



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

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Herschel T. Vinyard Jr.
Secretary

FINAL PERMITS

PERMITTEE

M.C. Graphics, Inc.
1527 102nd Avenue North
St. Petersburg, FL 33716

Authorized Representative:
Mr. Jeff Michael, VP of Manufacturing

Air Permit Nos. 1030218-015-AC
1030218-016-AO
Permits Expire: 06/15/2012 (AC)
06/15/2017 (AO)
Site Name: M.C. Graphics, Inc.
Minor Air Construction and Operation
Permits
Operation Permit Renewal and
Construction Permit Modification

These are the final air construction and operation permits, in one document. Construction Permit 1030218-015-AC removes the VOC loading rate limitations for Printing Line Nos. 2 and 3 (Emission Unit No. 002) and Printing Line No. 4 (Emission Unit No. 005). Operation Permit 1030218-016-AO is for the continued operation of a lithographic printing facility. The work is conducted at M. C. Graphics, Inc. (Standard Industrial Classification No. 2752). The facility is located in Pinellas County at 1527 102nd Avenue North in St. Petersburg, Florida. The UTM coordinates are Zone 17, 337.20 km East, and 3083.20 km North. As noted in the Final Determination provided with these final permits, no changes or only minor changes and clarifications were made to the draft permits.

This final document is organized by the following sections:

- Section 1. General Information
- Section 2. Administrative Requirements and Facility-wide Specific Conditions
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Because of the technical nature of the project, this document contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this document.

These air pollution permits are issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of these permits.

Upon issuance of these final permits, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This is a lithographic printing facility. Each printing press is equipped with a blanket wash and meter and roller cleaner system. The inks and cleanup solvents used in the operation of the printing presses contain volatile organic compounds (VOCs) and may contain hazardous air pollutants (HAPs). The existing facility consists of the following emissions units.

Facility ID No. 1030218	
ID No.	Emission Unit Description
002	Printing Line Nos. 2 and 3
003	Facility-wide VOC and HAP fugitive emissions
005	Printing Line No. 4

Project Description and Affected Emission Units

This project removes the VOC loading rate limitations for Printing Line Nos. 2, 3 and 4 and changes the requirements for the printing line's operation during testing from operating at 90-100% of the maximum VOC loading rate to operating at 90-100% of the maximum printing ink utilization rate. This project also renews Operation Permit 1030218-012-AF. This project will modify the following emissions units.

Facility ID No. 1030218	
ID No.	Emission Unit Description
002	Printing Line Nos. 2 and 3
005	Printing Line No. 4

NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

PERMIT HISTORY/AFFECTED PERMITS

These permits replace all previous construction permits and Operation Permit 1030218-012-AF.

**SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC
CONDITIONS (FINAL)**

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Air Quality Division. The mailing address and phone number of the Local Air Program is:

Pinellas Air Quality Division
300 South Garden Avenue
Clearwater, FL 33756
(727) 464-4422

3. Appendices - The following Appendices are attached as part of this document:

- a. Appendix A. Citation Formats and Glossary of Common Terms;
- b. Appendix B. General Conditions;
- c. Appendix C. Common Conditions; and
- d. Appendix D. Common Testing Requirements.
- e. Appendix E. Alternative Testing Procedure
- f. Appendix F. Operation & Maintenance Plan

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this document, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of these permits does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

[Rule 62-4.080, F.A.C.]

**SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC
CONDITIONS (FINAL)**

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/ modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.

[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.

[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to the Pinellas County Air Quality Division (Compliance Authority) no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:

- a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
- b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
- c. copies of the most recent compliance test reports required by Specific Condition Nos. B.13. and C.14., if not previously submitted;
- d. copies of the most recent two months of records/logs specified in Specific Condition No. A.6.; and
- e. any proposed revisions to the most recently approved O & M Plan by the Pinellas County Air Quality Division, if applicable.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. Common Conditions for EU Nos. 002, 003 and 005 – Printing Line Nos. 2, 3 and 4 and Fugitive VOC and HAP Emissions

This section addresses Specific Conditions that are common to Emission Unit Nos. 002, 003 and 005.

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 ("Potential to Emit"), F.A.C.]

A.2. Reasonable Assurance - In order to provide reasonable assurance that the original assumptions about the air management inside this facility do not change, all fans, blowers, dust collection equipment, air conditioning, the catalytic oxidizer and the thermal oxidizer in the facility shall be operating under normal operating conditions. Changes to the air management systems of this facility (including air conditioning and other air handling equipment) may render the VOC capture efficiencies ineffective. Notification shall be sent to the Pinellas County Air Quality Division under the following circumstances:

- a. The permittee shall submit notification when a change is contemplated. No changes shall be made without the approval of the Pinellas County Air Quality Division.
- b. The permittee shall submit notification when any portion of an existing air management system is damaged or becomes ineffective in any manner. This notification shall include any potential impact on VOC emissions. If the problem means the facility may not meet the capture efficiency assumptions, the notice shall be sent within 7 days.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030218-013-AC]

A.3. Process Changes - The permittee shall report any proposed process changes, including, but not limited to, (a) any proposed significant change of VOC/OS species, or (b) any proposed increase in the production rate, to the Pinellas County Air Quality Division and the Air Permitting section of the Southwest District of the Department for proper processing. Any physical change in, change in the method of operation of, or addition to a stationary source or facility, which increases the actual emissions of any air pollutant is considered a "Modification".

[Rule 62-210.300, F.A.C.; Construction Permit 1030218-013-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. Common Conditions for EU Nos. 002, 003 and 005 – Printing Line Nos. 2, 3 and 4 and Fugitive VOC and HAP Emissions

EMISSIONS STANDARDS

A.4. Volatile Organic Compound (VOC) Emissions and Hazardous Air Pollutant (HAP) Emission Limitations - VOC and HAP emissions which include the thermal oxidizer and catalytic oxidizer stacks and fugitive emissions from the printing inks, fountain solutions, wash solutions, natural gas combustion, and miscellaneous VOC containing materials from this facility’s regulated emission units shall not exceed the following levels.

Pollutant	Facility-wide Emission Limits (tons/consecutive 12 month period)
Total Volatile Organic Compounds (VOCs)	64.48
Total Hazardous Air Pollutants (HAPs)	5.76

[Rule 62-210.200 (“Potential to Emit”), F.A.C.; Construction Permit 1030218-013-AC]

A.5. General Pollutant Emission Limiting Standards – Volatile Organic Compounds Emissions or Organic Solvent Emissions - The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. Work practices to minimize emissions shall include the following:

- a. Equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such manner as to minimize leaks, fugitive emissions and spills of solvent materials. This includes draining all VOC containing fluids into closed containers during lengthy periods of time when a press is not operating;
- b. All VOC/OS from washings (equipment clean-up) shall be placed into containers that prevent evaporation into the atmosphere;
- c. Cover or close all VOC containers when they are not in use;
- d. Prevent excessive air turbulence across exposed VOC/OS; and
- e. Immediately confine and clean up VOC/OS spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.; Construction Permit 1030218-013-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. Common Conditions for EU Nos. 002, 003 and 005 – Printing Line Nos. 2, 3 and 4 and Fugitive VOC and HAP Emissions

RECORDS AND REPORTS

A.6. Material Usage and VOC and HAP Emission Records - In order to document compliance with the VOC and HAP limitations of Specific Condition No. A.4., monthly VOC and HAP material usage and emission records shall be kept for this facility. The logs shall include the following at a minimum:

- a. Facility Name, Facility ID No. (1030218), and Emission Unit ID No. (e.g., EU 002 - Printing Line Nos. 2 and 3);
- b. Day, Month and Year;
- c. Quantity of "As Applied" ink (by name or identification number) used, indicating the amount of each used (gallons or pounds);
- d. VOC and HAP content (as applied) for each type of ink utilized (If gallons are recorded for usage, content shall be recorded as lbs/gallon. If pounds are recorded for usage, content shall be recorded as percent by weight.);
- e. A calculation of VOC and HAP emissions (pounds per month) from each ink based on the information in c. and d. above;
- f. Quantity of other VOC/HAP containing materials (identify material with description) utilized (gallons and /or pounds per month), less disposal and/or reuse;
- g. VOC and HAP content (as applied) for each of the above materials utilized (If gallons are recorded for usage, content shall be recorded as lbs/gallon. If pounds are recorded for usage, content shall be recorded as percent by weight.);
- h. A calculation of VOC and HAP emissions (pounds per month) from the above materials based upon the information in f. and g. above;
- i. Monthly total of facility VOC and HAP emissions; and
- j. A calculation of the total facility VOC and HAP emissions for the most recent 12 consecutive month period.

All recordkeeping information shall be updated at least monthly, with each entry made no later than 15 days after the end of the month.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030218-013-AC; Pinellas County Code Section 58-90]

A.7. Controlled Emission/Calculations Requirement - The controlled emission recordkeeping and required calculations for Emission Unit 002 (Printing Line Nos. 2 and 3) and Emission Unit 005 (Printing Line 4) used to demonstrate compliance with the requirements of Specific Condition No. A.4., shall be based on the catalytic oxidizer or thermal oxidizer VOC destruction efficiencies from compliance testing, effective no later than January 1 of the year following the compliance test.

[Rules 62-4.070(3) and 62-209, F.A.C.; Construction Permit 1030218-013-AC; Pinellas County Code, Section 58-90]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. Common Conditions for EU Nos. 002, 003 and 005 – Printing Line Nos. 2, 3 and 4 and Fugitive VOC and HAP Emissions

A.8. VOC/HAP Emission Calculations - Unless modified by the Department or the Pinellas County Air Quality Division, the following assumptions are made for the purposes of VOC and HAP emission calculations for this facility:

- a. Printing Inks - VOC and HAP emissions from printing inks are based upon the assumption that 20% of the VOCs and HAPs from printing inks are retained on the printed product and are not released to the atmosphere. The remaining 80% of the VOC/HAP emissions from printing inks are captured (100% capture efficiency in the dryer due to the air flow and the composition of the inks) and sent to the catalytic oxidizer or thermal oxidizer, each having a 90% (minimum) destruction efficiency.
- b. Fountain Solutions - The controlled emissions for Emission Unit Nos. 002 and 005 are based upon the assumption that 70% of the Fountain Solutions are captured by the press dryers and oxidizers with a resulting VOC destruction determined by testing. The emissions for Emission Unit No. 003 are uncontrolled and represent the remaining 30% of Fountain Solution Emissions.
- c. Wash Solution (Blanket Wash and Meter and Roller Cleaner Solutions) - Blanket Wash and Meter and Roller Cleaner solutions have 100% VOC content. The controlled emissions for Emission Unit Nos. 002 and 005 are based upon the assumption that 80% of the combined Blanket Wash and Meter and Roller Cleaner Solutions are captured by the press dryers and oxidizers with a resulting VOC destruction determined by testing. The emissions for Emission Unit No. 003 are uncontrolled and represent the remaining 20% of Blanket Wash and Meter and Roller Cleaner Emissions.
- d. Combustion VOC Emissions - VOC emissions from natural gas combustion in the dryers, catalytic oxidizer and thermal oxidizer can be assumed to be equal to 0.42 tons/year (worst case PTE assuming operation of dryers, catalytic oxidizer and thermal oxidizer for 8,760 hours/year at maximum design heat input rate).

[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90]

A.9. Non-VOC Material Substitution - The substitution of a non-VOC/OS containing material for an existing production material containing VOC/OS shall not require recordkeeping, however, a log entry is required at the time of material substitution stating that a "non-VOC solution/solvent has been substituted for (*specify material*)".

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030218-013-AC; Pinellas County Code, Section 58-90]

A.10. VOC/HAP Records Documentation - Supporting documentation ("As Supplied", "As Applied" sheets, MSDS (Material Safety Data Sheet), EPA data sheets, purchase orders, etc.) shall be kept for each ink, VOC/OS and HAP containing material utilized at the facility, including "non-VOC" solutions in use. This documentation shall include sufficient information to:

- a. Provide reasonable assurance that any "non-VOC" solution/solvent in use at the facility indicates no VOC content based on an EPA Method 24 or 24A test;

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. Common Conditions for EU Nos. 002, 003 and 005 – Printing Line Nos. 2, 3 and 4 and Fugitive VOC and HAP Emissions

- b. Provide the basis for any electronic recordkeeping used for reporting emissions required in Specific Conditions of this permit.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030218-013-AC; Pinellas County Code, Section 58-90]

A.11. Record Retention - All recordkeeping information, supporting documentation, monitoring data, and all compliance test information required by this permit shall be retained at the facility for the most recent three (3) year period and shall be made available to the Department or the Pinellas County Air Quality Division upon request.

[Rule 62-4.160(14)(b), F.A.C.; Construction Permit 1030218-013-AC; Pinellas County Code, Section 58-90]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

B. EU 002 – Printing Line Nos. 2 and 3

This section of the document addresses the following emissions unit.

ID No.	Emission Unit Description
002	Printing Line No. 2 consists of a Harris Model M-110 printing press with a capacity of 6 printing units designed to operate at 1,100 feet per minute. The dryer associated with this press is fired with natural gas at a maximum heat input rate of 1.57 MMBtu per hour and a design exhaust flow rate of 1,200 scfm. Printing Line No. 3 consists of a Heidelberg Harris Model M600 printing press with a capacity of 6 printing units designed to operate at 1,500 feet per minute. The dryer used with this press is fired with natural gas at a maximum heat input rate of 3.00 MMBtu per hour and a total design exhaust flow rate of 2,945 scfm. VOC/OS /HAP emissions from both printing lines are controlled by one common natural gas fired TEC Systems Quantum 4000 catalytic oxidizer.

PERFORMANCE RESTRICTIONS

B.1. Destruction Efficiency -The VOC destruction efficiency of the TEC Systems Quantum 4000 catalytic oxidizer shall not fall below 90% removal.

[Rules 62-210.650, 62-296.320(1)(a), and 62-212.300, F.A.C.; Construction Permit 1030218-013-AC]

B.2. Catalytic Oxidizer Operation - The catalytic oxidizer shall be operating during all periods when Fountain Solutions, Blanket Wash Solution and Meter and Roller Cleaners are being utilized.

[Rule 62-4.070(3), F.A.C.]

B.3. Catalytic Oxidizer Operating Temperatures - This emissions unit shall not operate unless the associated catalytic oxidizer is operational and the catalyst bed inlet temperature is greater than 550° F and the outlet temperature is less than 1,100° F. (*See Specific Condition No. B.10. for temperature monitoring requirements.*)

[Rules 62-4.070(3) and 62-210.650, F.A.C.; Construction Permit 1030218-013-AC]

TESTING REQUIREMENTS

B.4. Annual Compliance Tests - During each federal fiscal year (October 1st to September 30th), the stack outlet of the catalytic oxidizer shall be tested for stack gas flow rate, stack gas temperature, stack gas velocity and visible emissions. The testing required in the year prior to permit renewal shall be conducted simultaneously with one of the Method 25/25A runs required to determine destruction efficiency (*see Specific Condition No. B.5.*)

[Rules 62-4.070(3) and 62-297.310, F.A.C.; Construction Permit 1030218-013-AC]

B.5. Compliance Tests Prior to Permit Renewal - A compliance test shall be performed on the catalytic oxidizer inlet and outlet on this emissions unit to determine VOC destruction efficiency no later than 60 days and no earlier than 10 months prior to the permit renewal application due date to demonstrate compliance with Specific Condition No. B.1.

[Rule 62-297.310(7)(a), F.A.C.; Construction Permit 1030218-013-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

B. EU 002 – Printing Line Nos. 2 and 3

B.6. Test Requirements - Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this document.
[Rule 62-297.310, F.A.C.]

B.7. Test Methods - Required tests shall be performed in accordance with the following reference methods.

Methods	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
9	Visual Determination of the Opacity of Emissions from Stationary Sources
24A	Determination of Volatile Matter Content and Density of Publication Rotogravure Inks and Related Publication Rotogravure Coatings
25/25A	Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

B.8. Ink VOC Content Determination - During the compliance test, the VOC content of the ink shall either be determined by using data from the most recent MSDS or an EPA Method 24A test. Any alternative method for determining VOC content may only be used after written approval is obtained from the Department or the Pinellas County Air Quality Division.
[Rules 62-4.070 (3), 62-297.310 and 62-297.401, F.A.C.; Construction Permit 1030218-013-AC]

B.9. Press Line Operation During Testing - All testing of the catalytic oxidizer shall be accomplished while simultaneously operating Printing Line Nos. 2 and 3 at 90 - 100% of the maximum "Printing Ink" utilization rate which is defined as both printing lines in operation under normal conditions (no less than 4 printing units per printing line operating).
[Rules 62-4.070(3), 62-297.310 (2) and (8), F.A.C.]

MONITORING REQUIREMENTS

B.10. Temperature Monitoring - In order to document ongoing compliance with Specific Condition No. B.3., the catalytic oxidizer shall be equipped with devices to continuously measure and record the inlet and outlet temperatures during all periods of printing press operation. The thermocouple shall be calibrated at least annually and shall be accurate to within ± 5 °F.
[Rules 62-4.070(3), 62-297.310(4)(d) and (reference Table 297.310-1), F.A.C.; Construction Permit 1030218-013-AC]

B.11. Excess Emissions/Malfunction - A record shall be made of each period that the catalytic oxidizer inlet temperature falls below 550°F or the outlet temperature exceeds 1,100°F (this includes

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

B. EU 002 – Printing Line Nos. 2 and 3

periods of printing press operation when the catalytic oxidizer is not in service) and shall include the reason for the incident, the actions taken to bring the catalytic oxidizer back into service with the appropriate temperatures, the time the catalytic oxidizer was back in service with the appropriate temperatures, and the estimated duration of the incident. If required in accordance with Rule 62-210.700(1), F.A.C., an excess emissions malfunction report shall be submitted in accordance with Rule 62-210.700(6) and Appendix C, Item 5.

[Rules 62-4.070(3) and 62-210.700, F.A.C.; Construction Permit 1030218-013-AC]

NOTIFICATION REQUIREMENTS

B.12. Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(Permitting Note: The notification should also include the relevant emission unit ID No(s), test method(s) to be used, and pollutants to be tested.)

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

B.13. Test Reports - The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this document. The following data is required to be included in the test report submittal*:

- a. operational status of each of the presses;
- b. statement that at least 4 units per printing line were operating during the test (normal conditions);
- c. oxidizer exhaust gas temperature;
- d. change in temperature across the catalyst bed of the catalytic oxidizer (include a copy of continuous recorder chart/data which includes the test period);
- e. stack gas flow rate;
- f. stack gas velocity;
- g. inlet and outlet VOC concentrations determined during the testing and used to calculate destruction efficiency;
- h. data on the VOC content of each ink being used during the tests; and
- i. amount of ink used during the compliance test (determined using available meters or other estimating information).

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

B. EU 002 – Printing Line Nos. 2 and 3

**Failure to submit this information may invalidate the test. Items g., h. and i. are only required for the VOC destruction efficiency test conducted prior to permit renewal.*

[Rules 62-4.070(3) and 62-297.310(8), F.A.C.]

B.14. Temperature Monitoring Requirements - In order to document compliance with the temperature monitoring requirements of Specific Condition No. B.10., copies of the continuous recorder chart/data for the catalytic oxidizer and the calibration records for the thermocouple shall be retained at the facility for the most recent three year period and shall be made available to the Pinellas County Air Quality Division or the Department, upon request.

[Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.; Construction Permit 1030218-013; Pinellas County Code, Section 58-90]

B.15. Operation and Maintenance (O & M) Plan for VOC and HAP Control - For the TEC Systems Quantum 4000 catalytic oxidizer the permittee shall maintain and implement an O & M Plan (*see Appendix F.*) to include a schedule for the maintenance and inspection of each control device, collection systems, and auxiliary equipment. Records of inspections, maintenance, and performance data of control devices and auxiliary equipment shall be retained by the emissions unit for a minimum of three (3) years and shall be made available to the Compliance Authority upon request. The performance parameters shall include operating rates and efficiencies. Such parameters and records shall include, at a minimum, that shown below.

- a. The operating parameters for each oxidizer;
- b. The timetable for routine oxidizer maintenance as specified by the manufacturer;
- c. The timetable for routine weekly, bi-weekly, or monthly oxidizer observations sufficient to ensure proper operation;
- d. A list of the type and quantity of oxidizer spare parts which are stored on the premises;
- e. A record log which indicates, at a minimum:
 1. When oxidizer maintenance and observations were performed;
 2. What oxidizer maintenance and observations were performed;
 3. Who performed said maintenance and observations; and
 4. Acceptable parameter ranges for each operational check.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030218-013-AC; Pinellas County Code, Sec. 58-128]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

C. EU 005 – Printing Line No. 4

This section of the document addresses the following emissions unit.

ID No.	Emission Unit Description
005	Printing Line No. 4 consists of a Heidelberg Harris Model M600 printing press with a capacity of 7 printing units designed to operate at 2,380 feet per minute. The natural gas fired dryer is a hot air web offset dryer that has an integrated afterburner (Ecotherm Model 121-1020) with a maximum heat input rate of 5.629 MMBtu per hour and a total design exhaust flow rate of 3,300 scfm. The afterburner (referred to hereafter as the thermal oxidizer) has a minimum design operating temperature of 1,400 °F and a minimum design VOC destruction efficiency of 90%. VOC/OS /HAP emissions are controlled by the thermal oxidizer.

PERFORMANCE RESTRICTIONS

C.1. Destruction Efficiency -The VOC destruction efficiency of the Ecotherm Model 121-1020 integrated afterburner shall not fall below 90% removal.
[Rules 62-210.650, 62-296.320(1)(a), and 62-212.300, F.A.C.; Construction Permit 1030218-013-AC]

C.2. Thermal Oxidizer Operation - The thermal oxidizer shall be operating during all periods when Fountain Solutions, Blanket Wash Solution and Meter and Roller Cleaners are being utilized.
[Rule 62-4.070(3), F.A.C.]

C.3. Thermal Oxidizer Operating Temperatures - This emissions unit shall not operate unless the associated thermal oxidizer is in service and operating at a combustion zone temperature of 1,400° F or greater. (See *Specific Condition No. C.11. for temperature monitoring requirements.*)
[Rules 62-4.070(3) and 62-210.650, F.A.C.; Construction Permit 1030218-013-AC]

TESTING REQUIREMENTS

C.4. Annual Compliance Tests - During each federal fiscal year (October 1st to September 30th), the thermal oxidizer stack shall be tested for stack gas flow rate, stack gas temperature, stack gas velocity and visible emissions. The testing required in the year prior to permit renewal shall be conducted simultaneously with one of the Method 25/25A runs required to determine destruction efficiency (see *Specific Condition No. C.5.*)
[Rules 62-4.070(3) and 62-297.310, F.A.C.; Construction Permit 1030218-013-AC]

C.5. Compliance Tests Prior to Permit Renewal - A compliance test shall be performed on the thermal oxidizer inlet and outlet on this emissions unit to determine VOC destruction efficiency no later than 60 days and no earlier than 10 months prior to the permit renewal application due date to demonstrate compliance with Specific Condition No. C.1.
[Rule 62-297.310(7)(a), F.A.C.; Construction Permit 1030218-013-AC]

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C.6. Test Requirements - Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this document.
[Rule 62-297.310, F.A.C.]

C.7. Test Methods - Required tests shall be performed in accordance with the following reference methods.

Methods	Description of Method and Comments
1,3,4	Traverse Points, Gas Analysis, and Moisture Content
9	Visual Determination of the Opacity of Emissions from Stationary Sources
24A	Determination of Volatile Matter Content and Density of Publication Rotogravure Inks and Related Publication Rotogravure Coatings
ASP	Alternative Performance Testing Procedure (see Appendix E.)

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.

[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

C.8. Thermal Oxidizer VOC Destruction Efficiency Test Methods and Procedures - Compliance with the VOC destruction efficiency requirement of Specific Condition No. C.1. shall be conducted by the methods and procedures described in Appendix E. - Alternative Performance Testing Procedure for Printing Line No. 4.

[Rules 62-4.070 (3), 62-297.310 and 62-297.401, F.A.C.; Construction Permit 1030218-013-AC]

C.9. Ink VOC Content Determination - During the compliance test, the VOC content of the ink shall either be determined by using data from the most recent MSDS or an EPA Method 24A test. Any alternative method for determining VOC content may only be used after written approval is obtained from the Department or the Pinellas County Air Quality Division.

[Rules 62-4.070(3), 62-297.310 and 62-297.401, F.A.C.]

C.10. Press Line Operation During Testing - All testing of the thermal oxidizer shall be accomplished while operating Printing Line No. 5 at 90 - 100% of the maximum "Printing Ink" utilization rate which is defined as operating under normal conditions (no less than 4 printing units operating).

[Rules 62-4.070(3), 62-297.310 (2) and (8), F.A.C.]

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MONITORING REQUIREMENTS

C.11. Temperature Monitoring - In order to document ongoing compliance with Specific Condition No. C.3. the thermal oxidizer shall be equipped with devices to continuously measure and record the operating temperature during all periods of printing press operation. The thermocouple shall be calibrated at least annually and shall be accurate to within ± 5 °F.

[Rules 62-4.070(3), 62-297.310(4)(d) and (*reference Table 297.310-1*), F.A.C.; Construction Permit 1030218-013-AC]

C.12. Excess Emissions/Malfunction - A record shall be made of each period that the thermal oxidizer combustion zone temperature is below 1,400°F (this includes periods of printing press operation when the thermal oxidizer is not in service) and shall include the reason for the incident, the actions taken to bring the thermal oxidizer back into service with the appropriate temperatures, the time the thermal oxidizer was back in service with the appropriate temperatures, and the estimated duration of the incident. If required in accordance with Rule 62-210.700(1), F.A.C., an excess emissions malfunction report shall be submitted in accordance with Rule 62-210.700(6) and Appendix C, Item 5.

[Rules 62-4.070(3) and 62-210.700, F.A.C.; Construction Permit 1030218-013-AC]

NOTIFICATION REQUIREMENTS

C.13. Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(Permitting Note: The notification should also include the relevant emission unit ID No(s), test method(s) to be used, and pollutants to be tested.)

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

C.14. Test Reports - The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this document. The following data is required to be included in the test report submittal*:

- a. operational status of each of the presses;
- b. statement that at least 4 units were operating during the test (normal conditions);
- c. thermal oxidizer exhaust gas temperature;
- d. thermal oxidizer combustion zone temperature (include copy of continuous recorder chart/data which includes the test period);

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- e. stack gas flow rate;
- f. stack gas velocity;
- g. inlet and outlet VOC concentrations determined during the testing and used to calculate destruction efficiency;
- h. data on the VOC content in each ink being used during the tests; and
- i. amount of ink used during the compliance test (determined using available meters or other estimating information).

**Failure to submit this information may invalidate the test. Items g., h. and i. are only required for the VOC destruction efficiency test conducted prior to permit renewal.*

[Rules 62-4.070(3) and 62-297.310(8), F.A.C.]

C.15. Temperature Monitoring Requirements - In order to document compliance with the temperature monitoring requirements of Specific Condition No. C.11., copies of the continuous recorder chart/ data for the thermal oxidizer and the calibration records for the thermocouple shall be retained at the facility for the most recent three year period and shall be made available to the Pinellas County Air Quality Division or the Department, upon request.

[Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.; Construction Permit 1030218-013-AC; Pinellas County Code, Section 58-90]

C.16. Operation and Maintenance (O & M) Plan for VOC and HAP Control - For the Ecotherm Model 121-1020 integrated afterburner (thermal oxidizer) the permittee shall maintain and implement an O & M Plan (*see Appendix F.*) to include a schedule for the maintenance and inspection of each control device, collection systems, and auxiliary equipment. Records of inspections, maintenance, and performance data of control devices and auxiliary equipment shall be retained by the emissions unit for a minimum of three (3) years and shall be made available to the Compliance Authority upon request. The performance parameters shall include operating rates and efficiencies. Such parameters and records shall include, at a minimum, that shown below.

- a. The operating parameters for the thermal oxidizer;
- b. The timetable for routine thermal oxidizer maintenance as specified by the manufacturer;
- c. The timetable for routine weekly, bi-weekly, or monthly thermal oxidizer observations sufficient to ensure proper operation;
- d. A list of the type and quantity of thermal oxidizer spare parts which are stored on the premises;
- e. A record log which indicates, at a minimum:
 - 1. When thermal oxidizer maintenance and observations were performed;
 - 2. What thermal oxidizer maintenance and observations were performed;
 - 3. Who performed said maintenance and observations; and
 - 4. Acceptable parameter ranges for each operational check.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030218-013-AC; Pinellas County Code, Sec. 58-128]