FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Cox Target Media Inc.
1 Valpack Avenue North
St. Petersburg, FL 33726

Authorized Representative:
David Fox, Vice President of Manufacturing

Air Permit No. 1030240-015-AF
Permit Expires: 09/19/2018
Valpak Direct Marketing Systems, Inc.
Minor Air Federally Enforceable State Operation Permit (FESOP)
Lithographic Printing Facility

This is the final permit to renew Air Operation Permit No. 1030240-014-AF for lithographic printing facility at the Cox Target Media, Inc. Largo Facility (Standard Industrial Classification No. 2752). The facility is located in Pinellas County at 8605 Largo Lakes Drive in Largo, Florida. The UTM coordinates are Zone 17 327.06 km East, and 3084.77 km North.

This final permit 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

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

This air pollution permit is 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 this permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of when and how the petitioner received notice of the agency decision;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Kelley M. Boatwright 09/19/2013

Kelley M. Boatwright — Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

David Fox, Cox Target Media, Inc.
david_fox@coxtarget.com

Linette Diaz, Cox Target Media, Inc.
linette_diaz@valpak.com

Gary Robbins, Pinellas County Air Quality Division
grobbins@co.pinellas.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Rhonda Hughes 9/19/2013
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The lithographic printing operation at this facility consists of four (4) printing lines as described below.

Facility ID No. 1030240

EU ID Nos.	Emissions Unit Description
001	Heat-Set Lithographic Press Printing Line Nos.1, 2, and 3 with Common Incinerator
003	Cold-Set Press Lines
005	Heat-Set Lithographic Press Printing Line No. 4 with oxidizer

Project Description and Affected Emission Units

Press No. 3, regulated under Emission Unit 001, is not in operation and will not be used in the future. All of the Cold-Set Presses, regulated under Emission Unit No. 003, have been removed from the facility. Emission Unit No. 005, which covers Printing Line 4 and the associated catalytic oxidizer, has not operated for over a year and will not be used in the future. This renewal permit only covers Press Nos. 1 and 2 with dryers and the associated catalytic oxidizer. This project deletes EU Nos. 003 and 005 and modifies the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Two Heat-Set Lithographic Presses & Dryers with a Common Catalytic Oxidizer (incinerator)

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 (HAPs).
- 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 62-213, 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 (VOC) and Hazardous Air Pollutants (HAPs). The emission limitations, restriction on the type or amount of material combusted, stored or processed in this permit will ensure that the facility's VOC and HAPs emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1030240-014-AF.

ADMINISTRATIVE REQUIREMENTS

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

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

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 Pinellas County Air Quality Division (PCAQD). The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, Florida 33756
Telephone: 727-464-4422

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

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. FDEP DARM Guidance Memos:
- DARM-OGG-002 (Guidance on the Use of EPA Methods 18, 25, and 25A for Measuring Gas Stream Volatile Organic Compounds Concentration)
- DARM-OGG-04 (Guidance Regarding Compliance Testing and EPA Method 25)

f. O&M Plan (TEC Systems Quantum 4000 catalytic oxidizer)

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, 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 this permit 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.]

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 Pinellas County Air Quality Division no later than 60 days prior to the expiration date of this 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 No. A.17., if not previously submitted;

d. copies of the most recent month of records/logs specified in Specific Condition No(s). 15, 17, A.14., and A.16.; and

e. any proposed revisions to the most recently approved O & M Plan (Pinellas County).

[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.]

FACILITY-WIDE SPECIFIC CONDITIONS

PERFORMANCE RESTRICTIONS

9. Operating Hours Limitation - This facility is permitted for continuous operation (i.e. permitted for 8,760 hours per year).
[Rule 62-210.200 (Definition "Potential to Emit"), F.A.C.; Construction Permit No. 1030240-013-AC]

EMISSION STANDARDS

10. Hazardous Air Pollutant Emissions - Total HAP emissions from this facility shall not exceed 16.0 tons in any consecutive 12-month period.

(*Permitting Notes: Compliance with the facility-wide HAP limitation of Specific Condition No. 10. above shall be determined from calculation of HAPs based Specific Condition No. A.14. and the Footnotes.*

Compliance with Specific Condition 11.b. will demonstrate compliance with the individual facility HAP emission limitation.)

[Rule 62-210.200 (Definition "Potential to Emit"), F.A.C.; Construction Permit No. 1030240-013-AC]

11. Combined Facility Hazardous Air Pollutant and Volatile Organic Compound Emission Limitations - HAP and VOC emissions from this facility and the Cox Target Media, Inc./Valpak Direct Marketing Inc. Saint Petersburg facility (*Facility ID 1030509*) shall not exceed the following:

a. 95.0 tons of VOC in any consecutive 12-month period;

b. 8.0 tons of any individual HAP in any consecutive 12-month period; and

c. 23.0 tons of total HAPs in any consecutive 12-month period.

(Permitting Note: Cox Target Media, Inc. has a Valpak Direct Marketing Systems, Inc. printing facility located at 1 Valpak Avenue North, Saint Petersburg, Pinellas County which is currently permitted by 1030509-014-AF. The two Valpak facilities (Facility ID Nos. 1030240 and 1030509) are addressed under separate permits with common emission limitations for individual HAPs, total HAPs, and VOC to maintain total emissions from both facilities below Title V permitting thresholds.)

[Rule 62-210.200 (Definition "Potential to Emit"), F.A.C.; Construction Permit No. 1030240-013-AC]

12. General Standards - Objectionable Odor - No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rules 62-210.200 (Definition "Objectionable Odor") and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178; Construction Permit No. 1030240-013-AC]

13. 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, organic solvents (OS) or VOCs without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Florida Department of Environmental Protection (the Department) or the Pinellas County Department of Environmental Management (PCDEM). 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 OS/VOC-containing fluids into closed containers during lengthy periods of time when a press is not operating.

b. All OS/VOCs from washings (e.g. equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.

c. Tightly cover or close all OS/VOC containers when they are not in use.

d. Prevent excessive air turbulence across exposed OS/VOCs.

e. Immediately confine and clean up OS/VOC 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 No. 1030240-013-AC]

RECORDKEEPING AND REPORTING REQUIREMENTS

14. Tons/Year Limitations - Compliance with "tons/year" emission limitations in this permit shall be based on any consecutive 12-month period total, or a Department approved optional recordkeeping scheme (e.g., 13 - "4-week" periods per year).
[Rule 62-4.070(3), F.A.C., Construction Permit No. 1030240-013-AC]

15. Hazardous Air Pollutant/Volatile Organic Compound Records - Supporting documentation ("As Supplied", "As Applied" sheets, Material Safety Data Sheets (MSDS), EPA data sheets, purchase orders, etc.) shall be kept for each ink and HAP-/organic solvent (OS)-/VOC-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; and

b. Provide the basis for any electronic recordkeeping used for reporting emissions limitations or utilization rates required in Specific Conditions of this permit.

[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90; Construction Permit No. 1030240-013-AC]

16. Non-Volatile Organic Compound Material Substitution - The substitution of a non-VOC containing material* for an existing production material containing VOC 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*).

(**Permitting Note*: *A "non-VOC" material is defined as a material which indicates no VOC content per an EPA Method 24 or 24A test.*)

[Rule 62-4.070(3); Pinellas County Code, Section 58-90; Construction Permit No. 1030240-013-AC]

17. Combined Facility Emission Records - In order to document compliance with the requirements of Specific Condition No. 11, combined facility emission records shall be maintained (for Facility ID Nos. 1030240 and 1030509). These records shall be updated at least monthly and shall be completed by the end of the following month. The records shall include the following:

a. The facility name, facility ID No. (e.g. 1030240 or 1030509);

b. The month and year;

c. A monthly total for each individual HAP, total HAP, and VOC emissions for each facility separately;

d. A monthly total of each individual HAP, total HAP, and VOC emissions for this facility and the Cox Target Media Inc. Saint Petersburg facility (Facility ID 1030509) combined;

e. The cumulative total emissions of each individual HAP, total HAP, and VOC emissions for the most recent consecutive 12-month period for each facility separately; and

f. The cumulative total emissions of each individual HAP, total HAP, and VOC emissions for the most recent consecutive 12-month period for this facility and the Cox Target Media Inc. Saint Petersburg facility (Facility ID 1030509) combined.

For the Largo facility, the consecutive 12-month VOC total shall include an assumed 1.0 tons for

miscellaneous heat-set fugitive emission and 0.22 tons for natural gas combustion[3] (or the calculated tons/year VOC emissions based on actual natural gas usage for that 12-month period).

[Rule 62-4.070(3), F.A.C.; Pinellas County Code Section 58-90; Construction Permit No. 1030240-013-AC]

18. 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 Florida Department of Environmental Protection (the Department) or the Air Quality Division of Pinellas County upon request.
[Rule 62-4.070(3), F.A.C.; Pinellas County Code Section 58-90; Construction Permit No. 1030240-013-AC]

19. Changes to Air Management System - Changes to the air management systems of this facility (including air conditioning and other air handling equipment) may render the assumed VOC capture efficiencies ineffective. The PCAQD shall be notified when a change is contemplated, or when any portion of an existing air management system is damaged in any manner. This notification shall include discussion of any potential impact on VOC emissions.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030240-013-AC]

A. EU No. 001 Two Heat-Set Lithographic Presses & Dryers with a Common Catalytic Oxidizer (incinerator)

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Two Heat-Set Lithographic Presses & Dryers with a Common Catalytic Oxidizer (incinerator) - Printing Line Nos. 1 and 2 utilize Harris Graphics Model M-110 lithographic heat-set printing presses. Printing Line No. 1 consists of six (6) printing units with a maximum speed of 1000 feet per minute. This line has a TEC Systems Model 1200 dryer fired with natural gas at a maximum heat input rate of 1.58 million Btu per hour. Printing Line No. 2 consists of four (4) printing units with a maximum speed of 1000 feet per minute. This line has a TEC Systems Model CP-215 dryer fired with natural gas at a maximum heat input rate of 2.63 million Btu per hour. The exhaust from the above dryers is connected to a common TEC Systems Quantum 4000 catalytic oxidizer with an integral heat exchanger, which is fired on natural gas at a maximum heat input rate of 1.73 million Btu per hour and is designed to have a VOC control efficiency of at least 90%.

EMISSIONS STANDARDS

(*Note: [#] indicates a footnote that appears at the end of this permit.*)

A.1. Volatile Organic Compound Emissions - The sum total VOC emissions from the Heat-Set Lithographic Press Operations Line Nos. 1 and 2 shall not exceed 80.17 tons in any consecutive 12-month period [(1)]. This value includes the stack and fugitive emissions from the printing inks, fountain solution, plant-wide wash solutions[(2)], natural gas combustion (0.22 TPY[(3)]), and miscellaneous heat-set fugitives (considered for the purposes of this permit to be a maximum of 1.0 TPY or less).
[Rule 62-296.320(1)(a), F.A.C.; Construction Permit No. 1030240-013-AC]

A.2. Material Usage - In order to insure compliance with the allowable annual emission rate in Specific Condition No. A.1., the following material usage limitations (totals for both heat-set press lines combined) shall apply for any consecutive 12-month period:

a. Heat-Set Printing Inks: 1,060,000 lbs;

b. Heat-Set Press Fountain Solution: 7,500 gallons - the permittee shall not use a VOC solution to dilute the "Fountain Solution".

c. Wash Solutions[(2)] (plant-wide): 17,500 gallons (less disposal and reuse).

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.; Construction Permit No. 1030240-013-AC]

A. EU No. 001 Two Heat-Set Lithographic Presses & Dryers with a Common Catalytic Oxidizer (incinerator)

A.3. Heat-Set Press Line Nos. 1 and 2 Catalytic Oxidizer Destruction Efficiency - The VOC destruction efficiency of the Heat-Set Lithographic Press Printing Line Nos. 1 and 2 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 No. 1030240-013-AC]

A.4. Heat-Set Press Line Nos. 1 and 2 Catalytic Oxidizer Exhaust Stack Flow Rate - The gas flow rate from the exhaust stack of the Heat-Set Lithographic Press Printing Line Nos. 1 and 2 Quantum 4000 catalytic oxidizer shall be at least 2,700 standard cubic feet per minute (scfm) when operating from both heat-set lithographic presses. There shall be no device on the exhaust stack which will interfere with the flow of the exhaust gases.
[Rules 62-4.070(3), 62-210.650, and 62-296.320(1)(a), F.A.C.; Construction Permit No. 1030240-013-AC]

A.5 Exhaust Flow - Whenever practical, the exhaust air flow through all the dryers shall be maintained during periods when Wash Solution[(2)] is being utilized.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030240-013-AC]

A.6. Bypass Stacks - The permittee shall not utilize a bypass stack which vents to the atmosphere at any time while ink is being applied. If ink is not being applied and best operational practices to minimize emissions are adhered to, then it is permitted to utilize a bypass stack only during periods of start up, shutdown, or malfunction. The permittee shall keep records of the date and time of commencement and completion of each time period that a bypass stack is utilized and ink is applied. The records shall include the reason for utilization of the bypass stack. They shall be maintained at the facility for a minimum of the most recent three-year period and made available to Air Quality Division of the Pinellas County upon request.
[Rules 62-4.070(3) and 62-210.700, F.A.C.; Construction Permit No. 1030240-013-AC]

COMPLIANCE TESTING REQUIREMENTS

A.7. Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.8. Compliance Test Methods - Required compliance 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
25/25A	Determination of Total Gaseous Nonmethane Organic Emissions as Carbon/Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer

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

A.9. Catalytic Oxidizer Destruction Efficiency Testing - Within the six (6) month period prior to the expiration date of this permit and prior to submittal of the operation permit renewal application *(see Specific Condition No. A.18.)*, the permittee shall test the catalytic oxidizer stack inlets and outlets to determine VOC destruction efficiency and document compliance with Specific Condition Nos. A.3. and A.4. A Method 9 VE test shall be performed simultaneously with one (1) of the three (3) Method 25/25A runs required in order to determine VOC destruction efficiency. A copy of the test data shall be submitted to the Air Quality Division of the Pinellas County within 45 days of testing.
[Rule 62-297.310, F.A.C.; Construction Permit No. 1030240-013-AC]

A.10. Additional Catalytic Oxidizer Testing Requirements - Compliance with the VOC destruction efficiency requirement and the controlled stack emission limitations shall be conducted using the methods and procedures as described in the attached FDEP DARM Guidance Memos (*see attached FDEP DARM Guidance Memos DARM-OGG-2 and DARM-OGG-04 (Attachment 1)*). 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. The data on the VOC concentration in each ink shall be submitted with the compliance test results. The amount of each ink used during the compliance test shall be determined using available meters or other information and shall be submitted with the compliance test report. Any alternative method for determining VOC content may only be used after written approval is obtained from the Department.
[Rules 62-4.070 (3) and 62-297.310, F.A.C.; Construction Permit No. 1030240-013-AC]

A.11. Press Line Nos. 1 and 2 Operation During Testing - All testing of the TEC Systems Quantum 4000 catalytic oxidizer in accordance Specific Condition No. A.9. shall be accomplished while simultaneously operating Heat-Set Lithographic Press Line Nos. 1 and 2 at 90 - 100% of the maximum "Printing Ink" utilization rate (defined as both heat-set press lines in operation under normal conditions). Failure to submit a statement of the status of the operation of the press lines during the test period or operating at conditions which do not reflect normal operating conditions, may invalidate the test. The test report shall also include the catalytic oxidizer exhaust gas temperature, the catalytic oxidizer stack gas flow rate and velocity, the change in temperature across the catalyst bed, and the inlet and outlet VOC concentrations from the catalytic oxidizer emission tests.
[Rules 62-4.070(3) and 62-297.310(2) and (8), F.A.C.; Construction Permit No. 1030240-013-AC]

NOTIFICATION REQUIREMENTS

A.12. Testing Notification - The permittee shall notify the Air Quality Division of the Pinellas County at least 15 days prior to the date on which each formal compliance test is scheduled, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating each 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.]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.13. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

A.14. Hazardous Air Pollutant/Volatile Organic Compound Material Usage and Emission Records[(1)] - In order to document compliance with the requirements of Specific Condition Nos. A.1. (Heat-Set VOC limit), A.2. (material usage limits), and 10 (Facility-wide HAP limit), HAP-/VOC-containing material usage and emission records shall be maintained. These records shall be updated at least monthly and shall be completed by the end of the following month. The records shall include the following:

a. The facility name, facility ID No. (1030240), and EU name and EU number (e.g., Heat-set Press Lines, EU No. 001);

b. The month and year;

c. The quantity of "As Applied" ink (by name or identification number) used, indicating the amount of each used (e.g. pounds) and the Line it was used on (i.e., used on Heat-set Press Line Nos. 1 and 2 (EU No. 001);

d. HAP and VOC content (as applied, percent by weight) for each type of ink utilized,

e. A calculation of potential HAP and VOC emissions[(1)]; (pounds per month) from each ink based on the information in C. and D. above; and controlled HAP and VOC emissions based on the most recent tested applicable catalytic oxidizer control efficiency;

f. The quantity of Fountain Solution utilized (pounds per month);

g. The quantity of Fountain Solution disposed and/or reused (pounds per month);

h. The quantity of Fountain Solution utilized (pounds per month), less disposal and/or reuse;

i. A calculation of fugitive and controlled HAP and VOC emissions (pounds per month) from Fountain Solution[(1)] based on h. above, the HAP and VOC contents (percent by weight) for Fountain Solution, and any applicable oxidizer control efficiency, including control efficiency used;

j. The plant-wide usage (gallons and/or pounds per month) of Blanket Wash and Meter Roller Cleaner (MRC) (each reported separately);

k. The plant-wide disposal and/or reuse (gallons and/or pounds per month) of Blanket Wash and Meter Roller Cleaner (MRC) (each reported separately);

l. The plant-wide usage (gallons and/or pounds per month) of Blanket Wash and Meter Roller Cleaner (MRC), less disposal and/or reuse (each reported separately);

m. A calculation of HAP and VOC emissions (pounds/month) from Blanket Wash and MRC based on l. above, their respective HAP and VOC content (percent by weight) and any applicable oxidizer control efficiency, including control efficiency used;

n. A monthly total for all of the above Heat-Set HAP and VOC emissions; and a cumulative most recent consecutive 12-month running total of Heat-Set HAP and VOC emissions and material usages (i.e. for Heat-Set inks, for Heat-Set Fountain Solutions, and for plant-wide Wash

Solutions[(2)]). Each consecutive 12-month VOC total shall include an assumed 1.0 tons/year for miscellaneous heat-set fugitive emission and 0.22 tons/year for natural gas combustion[(3)] (or the calculated tons/year VOC emissions based on actual natural gas usage for that 12 month period).

Substitution of a "non-VOC" containing solution shall not require utilization records, however a log entry is still required stating that a "non-VOC solution is in use". A "non-VOC" solution is defined as a solution which indicates no VOC content per an EPA Method 24 test.

[Rule 62-4.070(3), F.A.C.; Pinellas County Code Section 58-90; Construction Permit No. 1030240-013-AC]

A.15. Emission Calculations - Controlled emission calculations shall be based on the most recent tested VOC destruction efficiency for the catalytic oxidizer. The controlled emission calculations shall be based on the revised VOC destruction efficiency effective on the date of testing, unless otherwise notified in writing by the Air Quality Division of the Pinellas County.
[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Sect. 58-90; Construction Permit No. 1030240-013-AC]

A.16. Catalytic Oxidizer Operation Requirement and Outage Reporting - No heat-set press line shall operate unless the associated catalytic oxidizer (Quantum 4000 catalytic oxidizer for Heat-set Press Line Nos. 1 and 2) is in operation and the catalyst bed gas inlet temperature is between 600° F and 1,100^{o} F, except as stipulated below. There shall be an automatic cutoff device which shall not allow any heat-set press to operate unless the applicable catalytic oxidizer is operating at a temperature above 600°F. However, in the event of a catalytic oxidizer outage/malfunction, the permittee shall be allowed to operate the press lines without the catalytic oxidizer in service for a period to time not to exceed 48 hours. There shall be a maximum of two (2) such 48-hour periods in any consecutive 12-month period.

a. The following shall apply during these periods of catalytic oxidizer outage -

1. The permittee shall take reasonable steps to minimize VOC emissions, visible emissions (VE), and odors;
2. PCAQD shall be notified of the problems with the catalytic oxidizer immediately (not including weekends or legal holidays) of the occurrence;
3. PCAQD shall be informed of the steps taken to correct the problem and anticipated time frame to correct the problem; and
4. PCAQD shall be advised when the catalytic oxidizer was brought back on line.

b. Documentation of the catalytic oxidizer outage shall be kept as follows -

1. The identification of the catalytic oxidizer and the time of the start of the breakdown;
2. Reason for breakdown, and the steps taken to correct the problem;
3. The date and time PCDEM was notified and to whom reported;
4. Detailed information on the quantity of each ink and fountain solution used during the outage period, and
5. The time catalytic oxidizer was brought back on line.

The estimated amount of VOC emitted during the outage period shall be calculated and included in the

monthly VOC emission records and the oxidizer outage report. The PCAQD shall be provided with a detailed written report on the outage, including the information in B. above, within seven (7) working days (i.e. excluding week-ends and legal holidays).

[Rules 62-4.070(3), 62-4.130, 62-210.650, and 62-210.700(4), F.A.C.; Construction Permit No. 1030240-013-AC]

A.17. Catalytic Oxidizer Operation and Maintenance Plan - The catalytic oxidizers shall be operated and maintained in accordance with the applicable Operation and Maintenance (O&M) Plans *(see Attachment 2)* attached to this permit, or a later issue of the O&M plan approved by the Air Quality Division of the Pinellas County. The O&M plan shall meet the requirements of Pinellas County Code, Section 58-128, and shall include at a minimum:

a. The operating parameters for the catalytic oxidizer;

b. The timetable for routine catalytic oxidizer maintenance, as specified by the manufacturer;

c. The timetable for routine periodic observations (e.g. weekly, bi-weekly, monthly, etc.) of the pollution control device sufficient to insure proper operation;

d. A list of the type and quantity of the required catalytic oxidizer spare parts which are stored on the premises; and

e. A record log which indicates, at a minimum:

1. When catalytic oxidizer maintenance and observations were performed;
2. What catalytic oxidizer maintenance and observations were performed;
3. Who performed said maintenance and observations; and
4. Acceptable parameter ranges for each operational check.

The O&M plan documentation logs shall be maintained at the facility for a minimum of the most recent three-year period and shall be made available to Air Quality Division of the Pinellas County, or the Department, upon request.
[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Sec. 58-128; Construction Permit No. 1030240-013-AC]

FOOTNOTES

(1) Heat-Set Presses Source Assumptions:

a. HAP/VOC emissions from inks are based upon the assumption that there is a 100% capture efficiency in the drying ovens and that 20% of the VOCs are retained in the printed product and are not released to the atmosphere.
b. HAP/VOC emissions from Wash Solutions[(2)] are assumed 100% fugitive and for dispersion modeling purposes, exit the building through the catalytic oxidizer stack.
c. HAP/VOC emissions from "Fountain Solution" are assumed 50% fugitive and 50% controlled. For dispersion modeling purposes, the fugitive portion is assumed to exit the building through the catalytic oxidizer stack.
d. Hourly emission rates are based on monthly averages, except for compliance tests.
e. The capture efficiency of all fugitive emissions in the manufacturing area is assumed to be 100% and all fugitive emissions are assumed to be directed toward the catalytic oxidizer for destruction.

(2) Wash Solutions consist of Blanket Wash and Meter Roller Cleaner (MRC) from the entire facility (i.e. includes both Heat-Set and Cold-Set wash solutions).

(3) VOC emissions from natural gas combustion of 0.22 tons/year are based on an estimated maximum facility natural gas usage rate of 80 million cubic ft per year.