FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

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SECRETARY

FINAL PERMIT

PERMITTEE

Cox Target Media, Inc.
1 Valpak Avenue North
Saint Petersburg, FL 33716

Authorized Representative:
Mr. David Fox, Cox Target Media, Inc.

Air Permit No. 1030509-005-AC
Permit Expires: 01/15/2018
Cox Target Media Saint Petersburg Facility
Minor Air Construction Permit
Lithographic Printing Facility

This is the final air construction permit for a lithographic printing facility. The proposed work will be conducted at the Saint Petersburg facility (Standard Industrial Classification No. 7331). The facility is located in Pinellas County at 1 Valpak Avenue North in Saint Petersburg, Florida. The UTM coordinates are Zone 17, 336.6 km East, and 3082.3 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 Commonwealth Boulevard, 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Kelley M Boatwright

Kelley M. Boatwright
District Air Program Administrator
Southwest District

02/05/2014
Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, 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.

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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
(Clerk)

February 6, 2014
(Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility has a Signature Press Area that consists of two (2) GOSS Model Sunday 4000 Heatset Lithographic presses. Each press consists of eight (8) 78-inch wide printing units with a maximum speed of 2,500 feet per minute. Each press is equipped with a GOSS Ecocool/W Model 130-203R-NG dryer with a maximum heat input rate of 5.971 MMBtu/hour. Each press is equipped with an automated Baldwin Impact blanket wash system in which the cleaning agent is pre-impregnated into a cloth roll (volatile organic compound (VOC) content less than one percent (1 %)).

The two (2) presses are controlled by a common thermal oxidizer, a TANN Corporation, Model TR2592C Regenerative Thermal Oxidizer (referred to hereafter as the thermal oxidizer or RTO) fired with natural gas at a maximum heat input rate of 3.0 MMBtu/hour. The thermal oxidizer has a design operating temperature of 1,500 °F and a design VOC destruction efficiency of 99%.

This facility includes three (3) Caterpillar 3516 Generator Set stationary emergency diesel engines; each unit is rated at 2,250 ekW and 2,812 kVA. These engines are not subject to New Source Performance Standards (NSPS), Subpart IIII requirements.

The lithographic printing operation consists of the following emissions units (EUs).

Facility ID No. 1030509

EU ID No.	Emissions Unit Description
001	Four Heatset Presses with One Common Thermal Oxidizer
002	Three Stationary Emergency Diesel Engines

Project Description and Affected Emission Units

The facility was originally permitted for two large heatset presses and two small heatset presses all controlled by a common RTO under Air Construction Permit No. 1030509-001-AC. The two large presses were installed and are operating under Operation Permit No. 1030509-004-AO. The two small presses were not installed under the original AC permit. This construction permit is for the installation of two small heatset presses similar to those that were originally permitted in Construction Permit No. 1030509-001-AC.

Construction will take place in two phases. Phase One is the installation of the first small heatset lithographic press, a Harris Graphics Model 110 Heatset Lithographic press. Construction will begin upon issuance of the permit and is scheduled to be completed in one year. Phase Two is the installation of a second heatset lithographic press similar to the one installed in Phase One. Phase Two will begin after Phase One is completed and before the expiration of this permit.

An annual Visual Emissions test will no longer be required for the heatset presses (EU 001) because the RTO efficiency is continuously monitored for temperature and pressure.

The three existing emergency generators have a permitted fuel usage cap of 75,000 gallon/yr under Operation Permit No. 1030509-004-AO. This construction permit will remove this cap so the three generators can operate under the permitting exemption for Stationary Reciprocating Internal Combustion Engines in accordance with

Rule 62-210(3)(a)35., F.A.C. The fuel usage for the three emergency generators will be less than or equal to 64,000 gallons/yr. This project will modify the following emissions units (EUs).

EU ID No.	Emissions Unit Description
001	Four Heatset Presses with One Common Thermal Oxidizer
002	Three Stationary Emergency Diesel Engines

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

Exempt Emission Sources/Activities

- The permitted fuel usage cap of 75,000 gallon/yr under Operation Permit No. 1030509-004-AO for Emission Unit No. 002, Stationary Emergency Diesel Engines (3), will be removed so the generators can operate under the permitting exemption for Stationary Reciprocating Internal Combustion Engines in accordance with Rule 62-210(3)(a)35., F.A.C. The fuel usage for the emergency generators will be less than or equal to 64,000 gallons per any consecutive 12-month period.

  Note: The emergency generators are not subject to NSPS Subpart IIII because of their age. They are subject to the emergency generators provisions of the NESHAP 40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines).

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 in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces the Construction Permit No. 1030509-003-AC.

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. 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 Division of Air Resource Management (DARM) Guidance Memo: DARM-OGG-02 Guidance on the Use of EPA Methods 18, 25 and 25A for measuring Gas Stream Volatile Organic Compounds Concentration

f. Appendix F. FDEP Division of Air Resource Management (DARM) Guidance Memo: DARM-OGG-04 Guidance Regarding Compliance Testing and EPA Method 25

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. Application for Non-Title V Air Operation Permit - This permit authorizes modification of the permitted emissions units and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for Non-Title V air 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. a copy of the initial compliance test reports required by Specific Condition Nos. A.16., if not previously submitted;

d. copies of the most recent month of records/logs specified in Specific Condition Nos. A.17.; and

e. any proposed revisions to the most recently approved O & M Plan.

The application shall be submitted to the Permitting Authority with a copy to Pinellas County Air Quality Division (Compliance Authority).

[Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

FACILITY-WIDE SPECIFIC CONDITIONS

PERFORMANCE RESTRICTIONS

9. Restricted Operation - 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. 1030509-003-AC]

EMISSIONS STANDARDS

10. Combined Facility Hazardous Air Pollutant and Volatile Organic Compound Emission Limitations - Total

HAP and VOC emissions from this facility and the Cox Target Media, Inc./Valpak Direct Marketing Inc. Largo facility (*Facility ID 1030240*) 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: This condition will expire when the Largo Facility, 1030240, closes and rescinds its air operation permit.)

[Rule 62-210.200 (Definition "Potential to Emit"), F.A.C.; Construction Permit No. 1030509-003-AC]

11. 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 62-296.401(1)(b), F.A.C.; Pinellas County Code, Section 58-178; Construction Permit No. 1030509-003-AC]

12. Organic Solvent Emissions or Volatile Organic Compound Emissions Limiting Standards - 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 Air Quality Division (PCAQD). 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 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 VOC containers when they are not in use;

d. Prevent excessive air turbulence across exposed VOCs; and

e. Immediately confine and clean up 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. 1030509-003-AC]

RECORDKEEPING REQUIREMENTS

13. Record Maintenance - 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.; Pinellas County Code, Section 58-90; Construction Permit No. 1030509-003-AC]

14. 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 PCAQD, upon request.
[Rule 62 4.070(3), F.A.C.; Pinellas County Code, Section 58-90; Construction Permit No. 1030509-003-AC]

A. EU No. 001 Heatset Presses with One Common Thermal Oxidizer

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

EU ID No.	Emissions Unit Description
001	Heatset Presses (4) with Common Oxidizer (1) – This emissions unit consists of four (4) printing lines, including two (2) small presses (in the Small Press Area) and two larger presses (in the Signature Press Area) as described below. The Signature Press Area at the facility consists of two (2) GOSS Model Sunday 4000 Heatset Lithographic presses. Each press consists of eight (8) 78-inch wide printing units with a maximum speed of 2,500 feet per minute. Each press is equipped with a GOSS Ecocool/W Model 130-203R-NG dryer with a maximum heat input rate of 5.971 MMBtu/hour. Each press is equipped with an automated Baldwin Impact blanket wash system in which the cleaning agent is pre-impregnated into a cloth roll (volatile organic compound (VOC) content less than one percent (1 %)). The Small Press Area consists of two (2) heatset lithographic presses which will be installed in two Phases. Phase One is the installation of a Harris Graphics Model 110 Heatset Lithographic press consisting of four (4) to six (6) 26.5-inch wide printing units with a maximum speed of 1,000 feet per minute. The press is equipped with a TEC Systems dryer with a maximum heat input rate of 2.63 MMBtu/hour. Phase One is scheduled to be completed one year after the issuance of the permit. Phase Two is the installation of a Harris Graphics Model 110 Heatset Lithographic press, or a similar heatset press. This phase will begin after the installation of the Phase One press, and is to be completed by the expiration date of this permit. The four (4) presses will be controlled by a common thermal oxidizer, a TANN Corporation, Model TR2592C Regenerative Thermal Oxidizer fired with natural gas at a maximum heat input rate of 3.0 MMBtu/hour. The thermal oxidizer has a design operating temperature of 1,500 °F and a design VOC destruction efficiency of 99%.

EMISSIONS STANDARDS

A.1. Hazardous Air Pollutant (HAP) and Volatile Organic Compound (VOC) Emission Limitations - The HAP and VOC emissions shall not exceed the following:

a. 49.9 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: The VOC limit above includes the stack and fugitive emissions from the printing inks, fountain solution, wash solutions, natural gas combustion and miscellaneous VOC-containing materials.

[Rule 62-210.200 (Definition "Potential to Emit"), F.A.C.]

A.2. Thermal Oxidizer Destruction Efficiency - The VOC destruction efficiency of the thermal oxidizer shall not be below 98% removal.

[Rules 62-210.650, 62-212.300, and 62-296.320(1)(a), F.A.C.; Construction Permit 1030509-003-AC]

A.3. Circumvention of Control Equipment - The permittee shall not circumvent any air pollution control device or allow the emissions of air pollutants without the applicable air pollution control device (thermal oxidizer) operating properly and in accordance with the applicable Operation and Maintenance (O&M) Plan. No press shall operate unless the thermal oxidizer is in service and operating at a combustion zone temperature of 1,500.0 °F or greater, as measured by a five-minute average. (*See Specific Condition No. A.12. for oxidizer temperature monitoring requirements.*)
[Rules 62-4.070(3) and 62-210.650, F.A.C.; Construction Permit No. 1030509-003-AC]

A.4. Exhaust Airflow - Whenever practical, the exhaust airflow through all the dryers shall be maintained during periods when wash solution (blanket wash and roller wash) is being utilized.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030509-003-AC]

A.5. 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 two-year period and made available to PCAQD, or the Department, upon request.
[Rules 62-4.070(3) and 62-210.700, F.A.C.; Construction Permit No. 1030509-003-AC]

A.6. Thermal Oxidizer Visible Emissions Limitation - VE from the thermal oxidizer exhaust stack shall not exceed 20% opacity.
[Rules 62-296.320(4)(b)1. and 4., F.A.C.; Construction Permit No. 1030509-003-AC]

COMPLIANCE TESTING REQUIREMENTS

A.7. Thermal Oxidizer Destruction Efficiency Initial Compliance Tests - The permittee shall test the thermal oxidizer stack inlet and outlet to demonstrate initial compliance with the required VOC destruction efficiency *(See Specific Condition No. A.2.)*. The initial tests shall be conducted within 60 to 180 days of commencing operation of the Phase 1 heatset lithographic press. A second test shall be conducted within 60 to 180 days of commencing operation of the Phase 2 heatset lithographic press.
[Rules 62-4.070(3) and 62-297.310(7)(a)1., F.A.C.]

A.8. Thermal Oxidizer Destruction Efficiency Compliance Testing - The permittee shall test the thermal oxidizer stack inlet and outlet to determine VOC destruction efficiency within 105 to 360 days prior to the expiration date of the facility operation permit. (*See Specific Condition No. A.16. for test report requirements.*)
[Rule 62-297.310, F.A.C.; Construction Permit No. 1030509-003-AC]

A.9. Press Line Operation During Testing - Testing shall be accomplished while simultaneously operating all presses at 90 - 100% of the maximum "Printing Ink" utilization rate (defined as all operational heat-set presses operating under normal conditions printing products that could be expected to result in high VOC inlet loading to the thermal oxidizer). If fewer than four (4) presses are operating during the compliance test then operation is limited to this number of each type of press or less (i.e. if two of press ‘A’ and one of press ‘B’ are operating during testing, then the facility is limited to operating a maximum

of two of press 'A' and one of press 'B') until such time as successful testing with more presses in operation is conducted. Operation with more presses in service is allowed for no more than 15 consecutive days for the purposes of conducting this additional compliance testing. Failure to submit a statement of the status of the operation of the presses during the test period, or operating at conditions which do not reflect normal operating conditions, may invalidate the test.
[Rules 62-4.070(3), 62-297.310(2), and 62-297.310(8), F.A.C.; Construction Permit No. 1030509-003-AC]

A.10. 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.11. 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
9	Visual Determination of the Opacity of Emissions from Stationary Sources
25/25A (See Permitting Note below)	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 Pinellas County Air Quality Division.

(Permitting Note: Testing shall be conducted in accordance with the methods and procedures described in Appendix E. and Appendix F., FDEP DARM Guidance Memos OGC-2 and OGC-04. During the compliance test, the VOC content of the ink shall either be determined by using data from the most recent Material Safety Data Sheets (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 PCAQD.)

[Rule 62-204.800, F.A.C.; Appendix A of 40 CFR 60; Construction Permit No. 1030509-003-AC]

MONITORING REQUIREMENTS

A.12. Thermal Oxidizer Temperature Monitoring - In order to document ongoing compliance with Specific Condition No. A.3., the thermal oxidizer shall be equipped with devices to continuously measure and record the thermal oxidizer operating temperature during all periods of printing press operation. The thermocouple shall be calibrated at least annually and shall be accurate to within five degrees Fahrenheit (5 °F).
[Rules 62-4.070(3) and 62-297.310(4)(d) (reference Table 297.310-1), F.A.C.; Construction Permit No. 1030509-003-AC]

(Permitting Note: At the permittee's option, the thermocouple may be replaced in lieu of an annual calibration, provided that the replacement thermocouple has a valid certification of calibration from the manufacturer.)

A.13. Excess Emissions/Malfunction - A record shall be made of the minimum temperature of the thermal oxidizer for each 24-hr period (12 am – 12 am) and each period that the thermal oxidizer combustion zone temperature is below 1,500 °F. For purposes of determining compliance with the minimum temperature, five-minute averages of the two-second readings shall be used. Each hour of the day will consist of 12, five minute blocks. The five minute average blocks shall be based on traditional clock times (e.g. 12:05 to 12:10). For each period that the temperature is below 1,500 °F, for five minutes or longer, the record shall include:

a. the reason for the incident;

b. the actions taken to bring the oxidizer back into compliance with a temperature at or above 1,500°F;

c. the time the oxidizer was back in compliance with a temperature at or above 1,500°F;

d. the duration of the incident; and

e. the five-minute averages over the entire time period during which the temperature was below 1,500°F.

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).

[Rules 62-4.070(3) and 62-210.700, F.A.C.; Construction Permit No. 1030509-003-AC]

NOTIFICATION REQUIREMENTS

A.14. 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.]

A.15. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation Phase One Harris Press and Phase Two of the EU No. 001

after completing the modifications authorized by this permit, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070, and 62-210.200, F.A.C., (definition of Commence Operation)]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.16. Compliance Test Report - Test reports shall be submitted to the PCAQD within 45 days of testing. The report shall include the information required under Rule 62-297.310(8)(c), F.A.C. including the operating status of each of the presses, the thermal oxidizer combustion zone temperature (include copy of continuous recorder chart/data which includes the test period), the thermal oxidizer stack gas flow rate and velocity, and (for VOC destruction efficiency testing) the inlet and outlet VOC concentrations determined during the testing and used to calculate destruction efficiency. The data on the VOC content in each ink being used during the testing 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 estimating information and shall be submitted with the compliance test report.
[Rules 62-4.070(3) and 62-297.310(8)(c), F.A.C.; Construction Permit No. 1030509-003-AC]

A.17. Material Usage and Hazardous Air Pollutant/Volatile Organic Compound Emission Records - In order to document compliance with the HAP and VOC limitations of Specific Condition Nos. 10 and A.1., monthly HAP /VOC material usage and emission records shall be prepared for this facility. The logs shall include the following at a minimum:

a. the facility name, facility ID No. (1030509), and emission unit number (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 (gallons or pounds);

d. each individual HAP and VOC 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 each individual HAP and VOC emissions (pounds per month) from each ink based on the information in C. and D. above;

f. the quantity of other HAP-/VOC-containing materials (identify material with description) utilized (gallons and /or pounds per month), less disposal and/or reuse;

(*Note: At the permittee's option the assumption may be made that material purchases equal material usage provided that no material is used which are not purchased.*)

g. each individual HAP and VOC 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 each individual HAP, total HAP, and VOC emissions (pounds per month) from the above materials based upon the information in f. and g. above;

i. a calculation of the VOC emissions from natural gas combustion;

j. a monthly total of facility individual HAP, total HAP, and VOC emissions;

k. a calculation of the total facility individual HAP, total HAP, and VOC emissions for the most recent consecutive 12-month period; and

l. a calculation 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. Largo facility (Facility ID 1030240) combined.

[Rule 62-4.070(3), F.A.C.; Pinellas County Code Section 58-90; Construction Permit No. 1030509-003-AC]

A.18. Hazardous Air Pollutant and Volatile Organic Compound Emission Calculations - Controlled emission calculations for printing inks and fountain solutions (*See Notes below*) shall be based on the most recent tested VOC destruction efficiency for the thermal oxidizer, unless otherwise notified in writing by the PCAQD or the Department.
[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90; Construction Permit No. 1030509-003-AC]

(*VOC/HAP Emission Calculation Notes - Unless modified by the Department or PCDEM, the following assumptions are made for the purposes of VOC/HAP emission calculations for this facility:*

Printing Inks - HAP/VOC emissions from printing inks are based upon the assumption that 20% of the HAPs/VOCs from printing inks are retained on the printed product. The remaining 80% of the HAP/VOC emissions from printing inks are captured (100% capture efficiency in the dryer due to the speed of the line and the composition of the inks) and sent to the thermal oxidizer which has a 98% (or greater) destruction efficiency.

Fountain Solutions - 50% of the fountain solution VOCs are assumed to be captured and sent to the thermal oxidizer which has a 98% (or greater) destruction efficiency. The other 50% of the fountain solution VOCs are fugitive emissions which exit the building through vents.

Wash Solutions - VOCs from wash solutions (roller/blanket wash) and Baldwin Cleaning Agent are assumed to be all fugitive emissions which exit the building through vents.

Combustion VOC Emissions - VOC emissions from natural gas combustion in the dryers (4) and thermal oxidizer can be assumed to be equal to 0.0433 tons/month and 0.52 tons/ year (worst case Potential to Emit assuming operation of dryers and oxidizer for 8,760 hours/year at maximum design heat input rate).)

A.19 Hazardous Air Pollutant and Volatile Organic Compound Records Documentation - 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;

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. 1030509-003-AC]

A.20. 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. 1030509-003-AC]

A.21. Thermal Oxidizer Operation and Maintenance Plan - In accordance with the requirements of Pinellas County Code, Section 58-128, an Operation and Maintenance (O&M) Plan shall be submitted for the thermal oxidizer. This O&M plan shall be submitted as part of the application for an operation permit (*in accordance with Specific Condition No. 8*). At a minimum the O&M Plan shall include:

a. the operating parameters for the thermal oxidizer;

b. the time table for routine thermal oxidizer maintenance as specified by the manufacturer;

c. the time table for routine weekly, bi-weekly, or monthly thermal oxidizer observations sufficient to ensure proper operation;

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

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.

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 PCAQD, or the Department, upon request.

[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Sec. 58-128; Construction Permit No. 1030509-003-AC]