GTECH Corporation
Lakeland Facility

Facility ID No. 1050422
Polk County

Title V Air Operation Permit Renewal

Permit No. 1050422-003-AV
(Renewal of Title V Air Operation Permit No. 1050422-002-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Air and Solid Waste Permitting, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 470-5700
Fax: (813) 470-5996

Compliance Authority:

State of Florida
Department of Environmental Protection
Compliance Assurance Program, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 470-5700
Fax: (813) 470-5995

Title V Air Operation Permit Renewal

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DRAFT/PROPOSED PERMIT

PERMITTEE:
GTECH Corporation
4100 Frontage Road
Lakeland, Florida 33815

Permit No. 1050422-003-AV
Lakeland Facility
Facility ID No. 1050422
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Lakeland Facility is located in Polk County at 4100 Frontage Road, Lakeland, Florida. UTM Coordinates are: Zone 17, 398.86 East and 3102.20 North. Latitude is: 28° 02'32" North; and, Longitude is: 82° 01'36" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: Date, 200x
Renewal Application Due Date: Exp. Date -225, 20xx
Expiration Date: Eff. Date + 5 years, 20xx

(Draft/Proposed)

_____

Kelley M. Boatwright
Permitting & Waste Cleanup Program Administrator
Southwest District

KMB/nek/admin

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This facility consists of an instant lottery ticket production facility. The facility designs, prints, manufactures, warehouses, and distributes instant lottery tickets to a worldwide customer base.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Printing Operations
002	Emergency 800 KW Diesel-Fired Engine/Generator

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received August 27, 2014, this facility is not a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
Federal Regulations	
40 CFR 60, Subpart A, NSPS General Provisions	002
40 CFR 60, Subpart IIII, NSPS Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	002
State Regulations	
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	All

SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices - The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. **Not federally Enforceable -** Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means 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. Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions - The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The permittee shall comply with the following:

a. all equipment, pipes, hoses, lids, fittings, etc., shall be operated and maintained in such a manner as to minimize leaks, fugitive emissions, and spills of paints, inks, and solvent materials; and

b. all solvent from solvent washings that contain VOCs and/or OSs shall be directed into containers that prevent evaporation into the atmosphere.

[Rule 62-296.320(1), F.A.C.; Construction Permit 1050422-001-AC]

FW4. General Visible Emissions - No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter - No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. proper maintenance and operation of existing press perforation system, waste paper bailing and collection system;

b. proper maintenance of paved parking areas and access roads around facility;

c. adherence to posted facility speed limits; and

d. proper routine maintenance and operation of waste collection receptacles, roll-offs and related equipment at the facility.

[Rule 62-296.320(4)(c), F.A.C.; proposed by applicant in Title V air operation permit renewal application received August 27, 2014]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

FW7. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: https://cdx.epa.gov. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: http://www.epa.gov/osweroe1/content/rmp/index.htm. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

***IMPORTANT NOTES TO PERMITTEE*:**

Permit Renewal - see Appendix TV, Condition No. TV18.
(Note - Renewal application is due 225 days prior to expiration date of this permit.)

Subsection A. Emissions Unit No. 001 – Printing Operations

The specific conditions in this section apply to the following emissions unit (EUs):

EU ID No.	Brief Description
001	Printing Operations - In the printing process, plates are produced and installed on up to 22 BHS-IN-LINE, TYPE AF/UF 820-22 INTRO flexographic printing units (presses) that transfer inks and coatings to paperboard substrates. Two (2) inkjet printing units (presses) are also used to transfer inks and coatings to the instant lottery tickets. The inks and coatings applied to the tickets are then dried and/or cured. It is during these (drying/curing) processes that airborne volatile organic compound (VOC) and/or hazardous air pollutant (HAP) emissions are generated. All of the printing units are equipped with dryers that receive outside air from a single supply plenum and exhaust all air to the atmosphere via a single exhaust plenum. Each individual printing unit is equipped with a variable speed dryer which may be equipped with hot air impinged and/or infrared dryers. The dryers are only fired with natural gas at a maximum total combined heat input rate of 18.0 MMBtu/hr.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation - This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 1050422-001-AC]

A.2. Printing Units (Presses) Limitations - This emissions unit shall have no more than twenty-two (22) BHS-IN-LINE, TYPE AF/UF 820-22 INTRO flexographic printing units (presses) and two (2) inkjet printing units (presses).
[Rules 62-4.160(2) and 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 1050422-001-AC]

A.3. Fuel Usage Limitations - The dryers for each printing unit (press) shall be fired with only natural gas at a maximum total combined heat input rate of 153.087 million cubic feet per any consecutive 12-month period, which is based on 18,000,000 Btu/hr. x 1 $ft.^3$/1030 Btu x 8,760 hrs./yr. = 153.087 million cubic feet/yr.
[Rules 62-4.160(2) and 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 1050422-001-AC]

Emission Limitations and Standards

A.4. VOC and Total HAP Emission Limitations - Emissions shall not exceed the following:

a. 213.0 tons of VOC per any consecutive 12-month period; and

b. 9.0 tons of total HAPs per any consecutive 12-month period.

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 1050422-001-AC]

Recordkeeping and Reporting Requirements

A.5. Reporting Requirements - See Appendix RR, Facility-Wide Reporting Requirements, for reporting requirements.
[Rule 62-4.070(3), F.A.C.]

A.6. VOC and Total HAP Emission Recordkeeping Requirements - In order to document compliance with Specific Condition Nos. A.2. and A.3., the permittee shall maintain monthly records for all VOC and/or HAP containing materials, which shall contain at a minimum the following:

a. facility ID No. (1050422);

b. date (Month/Year);

c. amount of cubic feet of natural gas used;

d. name/identification of each VOC and HAP containing material used;

e. VOC and/or HAP content in each material used;

f. amount of each material used for the month (Note: At the permittee's option the assumption may be made that material purchases equal material usage, provided no materials are used that are not purchased.);

g. calculate and record the VOC emissions from each material (based on amount of material used and VOC content) along with the total emissions, in tons, from all the materials;

h. calculate and record the total HAP emissions from each material (based on the total emissions of each individual HAP from the amount of materials used) along with the total emissions, in tons, from all the materials;

i. calculate and record the most recent consecutive 12-month period total of VOC emissions, in tons;

j. calculate and record the most recent consecutive 12-month period total HAP emissions, in tons; and

k. calculate and record the most recent consecutive 12-month period total amount of natural gas used, in cubic feet.

Supporting documentation (MSDS sheets, "As Supplied" sheets, purchase orders, purchase records, inventory records, production records, etc.), which includes sufficient information to determine emissions and natural gas usage shall also be kept. The monthly records shall be completed by the 15th day of the following month. These records along with the supporting documentation shall be recorded in a permanent form suitable for inspection by the Department upon request and maintained at the facility for the most recent five (5) year period.

[Rules 62-4.070(3), 62-213.440, and 62-4.160, F.A.C.; Construction Permit 1050422-001-AC]

Subsection B. Emissions Unit No. 002 – Emergency 800 KW Diesel-Fired Engine/Generator

The specific conditions in this section apply to the following emissions unit (EU):

EU ID No.	Brief Description
002	Emergency 800 KW Diesel-Fired Engine/Generator - This is a Milton CAT C27 Packaged Engine/Generator Assembly with twelve (12) cylinders. Each cylinder has a displacement of 2.25 liters. The engine is rated at 800 KW and 1,214 HP. The engine/generator was manufactured on April 9, 2008. It is EPA Tier 2 certified. This engine is operated no more than 15 minutes per week and provides emergency power only.

(Permitting Note: This is a "new" stationary emergency compression ignition reciprocating internal combustion engine (CI RICE) with a displacement of less than 10 liters per cylinder, located at an area source of HAP, that commenced construction on or after 6/12/2006, and that has a post-2007 model year.)

PERFORMANCE RESTRICTIONS

B.1. Federal Regulatory Requirements - This emissions unit is subject to 40 CFR 60, Subpart A - General Provisions, 40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 63, Subpart ZZZZ – Reciprocating Internal Combustion Engines, which are adopted by reference in Rule 62-204.800, F.A.C.

(*Permitting Note: In accordance with provisions of 40 CFR 63.6590(c)(1), meeting the requirements of 40 CFR 60, Subpart IIII, satisfies compliance with the requirements of 40 CFR 60, Subpart ZZZZ.)*

[Rule 62-204.800(8) and Rule 62.800(11), F.A.C.]

B.2. Hours of Operation - The permittee must operate this emissions unit according to the requirements in 40 CFR 63.6640(f)(1), (2) and (4). There is no time limit on the use of this emissions unit in emergency situations. This emissions unit may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph 40 CFR 60.6640(f)(2). If this emissions unit is not operated according to these requirements it will not be considered an emergency engine under 40 CFR 63, Subpart ZZZZ and must meet all requirements for non-emergency engines.
[40 CFR 63.6640(f)]

B.3. Operation and Maintenance - The permittee must operate and maintain the stationary CI internal combustion engine according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. In addition, the permittee may only change those settings that are permitted by the manufacturer.
[40 CFR 60.4206, 4211(a)(1), (2) and (3)]

B.4. Compliance Requirements Due to Loss of Certification - If this emissions unit is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the emission-related settings are changed in a way that is not permitted by the manufacturer, the permittee must follow the requirements in 40 CFR 60.4211(g)(3).
[40 CFR 60.4211(g)(3)]

RECORDKEEPING REQUIREMENTS

B.5. Hours of Operation Records - The permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time.
[40 CFR 60.4214(b)]

B.6. Maintenance Records - To demonstrate conformance with the manufacturer's written instructions for maintaining the certified engine, the permittee must keep the following records:

a. Engine manufacturer data indicating compliance with the standards.

b. A copy of the manufacturer's written instructions for operation and maintenance of the certified engine.

c. A written maintenance log detailing the date and type of maintenance performed on the engine, as well as any deviations from the manufacturer's written instructions.

[40 CFR 60.4211; Rule 62-213.440(1), F.A.C.]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary

Appendix I, List of Insignificant Emissions Units and/or Activities

Appendix NSPS 40 CFR 60, Subpart A – General Provisions

Appendix NSPS 40 CFR 60, Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

Appendix RR, Facility-wide Reporting Requirements

Appendix TV, Title V General Conditions

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Statement of Basis

Table H, Permit History