TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Trend Offset Printing Services, Inc.
10301 Busch Drive
Jacksonville, Florida 32218
Facility ID No. 0310503

PROJECT

Application for Synthetic Minor Source Air Construction Permit
Project No. 0310503-010-AC

This permit is for the construction of a Heidelberg M600 Lithographic Offset Heatset Printing Press. The new Heidelberg M600 Lithographic Offset Heatset Printing Press will be grouped with the two existing lithographic presses, Goss International M600 Printing Press and the Heidelberg 8 Printing Press, under Emission Unit No. 005.

COUNTY

Duval, Florida

PERMITTING AUTHORITY

Regulatory Compliance Department
Environmental Quality Division
Ed Ball Building, 214 North Hogan Street, Suite 500
Jacksonville, Florida 32202
Telephone: (904) 255-7100
Fax: (904) 255-7130

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (FS). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (FAC), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, FAC.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, FAC.

In accordance with the terms of its Specific Operating Agreement the City of Jacksonville, Regulatory Compliance Department, Environmental Quality Division has been delegated the Permitting Authority to process this determination on behalf of the Department.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which will be defined in this permit.

Facility Description and Location

Trend Offset Printing Services, Inc. currently operates three heatset lithographic printing presses. Heidelberg M600 Offset Heatset Lithographic Printing Press is under emission Unit No. 001. Gross International M600 and Heidelberg 8 Offset Heatset Lithographic Printing Presses are grouped under Emission Unit No. 005. In addition, a Heidelberg V30 Offset Non-Heatset Lithographic Printing Press is under Emission Unit No. 003. Trend Offset Printing Services, Inc. is located at 10301 Busch Drive, Jacksonville, Duval County, FL 32218; UTM Coordinates: Zone 17, 438.90 km East and 3365.96 km North; Latitude: 30° 25' 25" North and Longitude: 81° 38' 10" West.

The facility is located in an area designated as; unclassifiable for the air pollutants particulate matter less than or equal to ten (10) micrometers (PM10), sulfur dioxide (SO2), and lead (Pb); an air quality maintenance area for ozone (O3); and in the area of influence of an air quality maintenance area for particulate matter (PM); pursuant to state and federal Ambient Air Quality Standards (AAQS), Chapter 62-204, Florida Administrative Code (FAC), and Rule 2.201, Jacksonville Environmental Protection Board (JEPB).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, FAC.
- The facility is not a major stationary source in accordance with Rule 62-212.400, FAC for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility is a synthetic non-Title V source of air pollution.

Project Description

This permit is for the construction of a new Heidelberg M600 Lithographic Offset Heatset Printing Press. The new Heidelberg M600 Lithographic Offset Heatset printing press will be grouped with the two existing lithographic presses, the Goss International M600 printing press and the Heidelberg 8 printing press, under Emission Unit No. 005.

During the operation of the proposed Heidelberg M600 Lithographic Offset Heatset Printing Press, roll stock will be directed through the printing press as a continuous web. The printed paper will then be directed through a dryer to cure the heatset inks. The proposed Heidelberg M600 Offset Heatset Lithographic Printing Press will be equipped with an automatic blanket wash system to clean the printing blankets. The automatic blanket wash system is an enclosed system that will vent to the existing RTO. As a result, VOC emissions resulting from the use in the blanket wash unit will be reduced based on the capture and destruction efficiency of the existing RTO.

Trend Offset Printing Services, Inc. has indicated that they intend to remain a synthetic minor source by maintaining facility-wide VOC emissions at less than 100 tons per year. The new Heidelberg M600 Lithographic Offset Heatset Printing Press will be grouped with the two existing printing presses under Emission Unit No. 005. The addition of the new Heidelberg M600 Lithographic Offset Heatset Printing Press would result in an increase in VOC emissions at Emission Unit 005. Trend Offset Printing Services, Inc. shall maintain the maximum VOC emission limitation of 25 tons per year at Emission Unit No. 005 in order to remain a synthetic minor source.

Processing Schedule

July 14, 2014 - Received the application for a synthetic minor source of air pollution construction permit.

2. PSD APPLICABILITY

PSD Applicability for Project

The facility is not a major stationary source of air pollution for PSD purposes because the potential emissions of PSD air pollutants are less than 250 tons per year pursuant to Rule 62-210.200(189), FAC and Rule 2.301, JEPB.

This project is not subject to PSD preconstruction review requirements since the proposed project itself has potential emissions of PSD air pollutants that are less than 250 tons per year pursuant to Rule 62-210.200(174), FAC and Rule 2.301, JEPB.

3. APPLICATION REVIEW

Discussion of Emissions

Two Heidelberg Contiweb Duel deck drying ovens control volatile organic compound (VOC) emissions from Emission Unit No. 001 and a Regenerative Thermal Oxidizer (RTO) controls VOC emissions from Emission Unit No. 005. The RTO under Emission Unit No. 005 will operate to control emissions from the proposed Heidelberg M600 printing press and the existing Gross International M600 and Heidelberg 8 Offset Heatset Lithographic Printing Presses.

The facility is a synthetic non-Title V source of air pollution because the operational limit assumed by the owner will ensure the potential emissions of regulated air pollutants are less than 100 tons per year and the potential emissions of Hazardous Air Pollutants (HAP's) are less than 10 tons per year for a single HAP and less than 25 tons per year for total HAP's pursuant to Rule 62-210.200(188), F.A.C., and Rule 2.301, JEPB.

Local Requirements

This facility is subject to Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 365 [Hazardous Regulated Substance Program], Chapter 376 [Odor Control] of the Ordinance Code of the City of Jacksonville, Title X; and Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice], and Rule 2, Part Numbers I through III and Part Numbers X through XIV [Air Pollution Control], JEPB.

State Requirements

This facility is subject to the applicable sections of Chapter 403, F.S. and Rules 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

4. PRELIMINARY DETERMINATION

The Permitting Authority makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Mr. Harry D. Smith is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting Mr. Smith at (904) 255-7196 or by e-mailing him at hsmith@coj.net.

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