Permittee:
Trend Offset Printing Services, Inc.
10301 Busch Drive
Jacksonville, FL 32218

FINAL Permit No.: 0310503-010-AC
Facility ID No.: 0310503
SIC No(s).: 27
Project: Lithographic Offset Heatset Printing Press

This permit is for the construction of a Heidelberg M600 Lithographic Offset Heatset Printing Press. 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.

This permit is issued under the provisions of Chapter 403, Florida Statutes (FS) and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, Florida Administrative Code (FAC). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Regulatory Compliance Department, Environmental Quality Division (Permitting Authority) in accordance with the terms and conditions of this permit.

Operation Permit Application Due Date: **July 1, 2015**
Expiration Date: **September 30, 2015**

Regulatory Compliance Department
Environmental Quality Division

Robert Steven Pace, P.E., Manager
Air Quality Branch

RSP/HDS

Section I. Facility Information

Subsection A. Facility/Project Description

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.

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.

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 existing Goss International M600 and Heidelberg 8 Offset Heatset Printing Presses under 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 lithographic offset heatset printing presses.

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 TEC Systems 2 Zone 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 RTO.

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), FAC, and Rule 2.301, JEPB.

Prevention of Significant Deterioration (PSD) requirements do not apply since the potential emissions of any one regulated pollutant are less than 250 tons per year pursuant to Rule 62-210.200, FAC, and Rule 2.301, JEPB.

Subsection B. Summary of Emission Unit (EU) ID Nos. and Brief Descriptions

EU No.	EU Description	Control Device
005	Heidelberg Lithographic Offset Heatset Printing Press M600	Regenerative Thermal Oxidizer (RTO)

Subsection C. Relevant documents

Air Operation Permit No. 0310503-008-AO
Permit Amendment, Project 0310503-009-AO
Air Construction Permit Application received July 14, 2014

Section II. Facility Wide Conditions

Subsection A. General Conditions

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and are binding and enforceable pursuant to Section 403.141, FS. The permittee is placed on notice that the Permitting Authority will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Permitting Authority.

3. As provided in subsections 403.987(7), FS, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Permitting Authority rules, unless specifically authorized by an order from the Permitting Authority.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Permitting Authority rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Permitting Authority rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Permitting Authority personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

   a. Have access to and copy any records that must be kept under conditions of the permit;
   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Permitting Authority rules.

   Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Permitting Authority with the following information:

   a. A description of and cause of noncompliance; and
   b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Permitting Authority for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Permitting Authority may be used by the Permitting Authority as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Permitting Authority rules, except where such use is prescribed by Sections 403.111 and 403.73, FS. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Permitting Authority rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Permitting Authority rules.

11. This permit is transferable only upon Permitting Authority approval in accordance with Rule 62-4.120, FAC, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Permitting Authority.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

    ( ) Determination of Best Available Control Technology (BACT)
    ( ) Determination of Prevention of Significant Deterioration (PSD)
    ( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
    ( ) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

    a. Upon request, the permittee shall furnish all records and plans required under Permitting Authority rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Permitting Authority.
    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by this permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Permitting Authority rule.
    c. Records of monitoring information shall include:

       1. The date, exact place, and time of sampling or measurements;
       2. The person responsible for performing the sampling or measurements;
       3. The date(s) analyses were performed;
       4. The person responsible for performing the analyses;
       5. The analytical techniques or methods used;
       6. The results of such analyses.

15. When requested by the Permitting Authority, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Permitting Authority, such facts or information shall be corrected promptly.

Subsection B. Specific Conditions

1. Any revision(s) to a permit (and application) shall be submitted to and approved by the Permitting Authority prior to implementing.
   [Rule 62-4.080(2), FAC, and Rule 2.1401, JEPB]

2. The construction/modification shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Permitting Authority must be notified in writing sixty (60) days prior to the expiration of the construction permit. A new schedule and request for an extension of the construction permit must be submitted.
   [Rule 62-4.080(3), FAC, and Rule 2.1401, JEPB]

3. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an air operation permit. The permittee shall submit the completed application, application fee, along with compliance records and test results, to the Permitting Authority ninety (90) days prior to the expiration date of the construction permit but no later than 90 days after completion of construction, whichever occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate.
   [Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

4. Permittee shall notify the Permitting Authority fifteen (15) days prior to EU testing.
   [Rule 62-297.310(7)(a)9., FAC, and Rule 2.1201, JEPB]

5. Testing of emissions shall be conducted with the EU operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, the EU may be tested at less than capacity; in this case subsequent EU operation is limited to 110 percent of the test load until a new test is conducted. Once the EU is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.
   [Rule 62-297.310(2), FAC, and Rule 2.1201, JEPB]

6. Copies of the test report(s) shall be filed with the Permitting Authority within forty-five (45) days of completion of testing.
   [Rule 62-297.310(8)(b), FAC, and Rule 2.1201, JEPB]

7. Permittee shall submit an Annual Operation Report to the Permitting Authority for this (these) emission unit(s) on the form(s) supplied for each calendar year on or before April 1.
   [Rule 62-210.370(3), FAC, and Rule 2.301, JEPB]

8. Stack sampling facilities shall comply with the requirements of Rule 62-297.310(6), FAC, and Rule 2.1201, JEPB.

9. Control equipment shall be provided with a method of access that is safe and readily accessible.
   [Rule 62-297.310(6), FAC, and Rule 2.1201, JEPB]

10. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter emissions 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 include the following:

    a. Paving and maintenance of roads, parking areas and yards.
    b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
    c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
    d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
    e. Landscaping or planting of vegetation.
    f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
    g. Confining abrasive blasting where possible.
    h. Enclosure or covering of conveyor systems.

    [Rule 62-296.320(4)(c)., FAC, and Rule 2.1101, JEPB]

11. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
    [Rule 62-296.320(2), FAC, and Rule 2.1101, JEPB]

12. The facility shall be subject to City of Jacksonville Ordinance Code, Title X, Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 376 [Odor Control], and JEPB Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice].

13. The facility shall be subject to JEPB Rule 2, Part Nos. I through VII, and Part Nos. IX through XIV.

14. The permittee shall submit all compliance related notifications and reports required of this permit to:

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

Section III. Emission Units and Conditions

Emission Unit 005 - Heidelberg Lithographic Offset Heatset Printing Press M600

Emission Unit Description:	Heidelberg Press M600 - Paper roll stock is directed through the printing press as a continuous web. Upon completion of the application of the printing ink, the web is directed through a TEC Systems 2 Zone dryer to cure the heatset inks. The web is dried by hot air generated in the drying oven which is fired by natural gas.
Control Device:	Regenerative Thermal Oxidizer (RTO) (Tann Corporation, Model No. TR1394C)

Essential Potential to Emit (PTE) Parameters

1. Each printing press is permitted to operate continuously; i.e.: 8760 hours per year.
   [Rule 62-210.200(225), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. Heidelberg Press M600 - This printing press's maximum process rate is limited to 2000 lbs/day of ink (37.19 lbs/day of VOC), 70 lbs/day (42.58 lbs/day of VOC) of blanket wash and 140 lbs/day (2.55 lbs/day of VOC) of fountain solution.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

3. Heidelberg Press M600 - This printing press's maximum heat input to two dryer burners is limited to 6.3 mmBtu/hr while firing natural gas.

   Tann RTO – The maximum heat input to the RTO is limited to 2.0 MMBtu/hr firing natural gas and/or evaporated VOCs.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

4. This EU's VE is limited to less than 20% opacity.
   [Rule 62-296.320(4)(b)1, FAC, and Rule 2.1101, JEPB]

5. This EU's maximum VOC emissions are limited to 25 TPY.
   [Applicant's request, Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

6. The minimum VOC destruction efficiency of the RTO shall be 95% and the minimum VOC capture efficiency shall be 100%. The minimum temperature at the outlet of the RTO shall be maintained at 1400 degrees Fahrenheit. This temperature shall be maintained during all periods of press operation including, but not limited to, blanket wash operations.
   [Applicant's request, Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

Test Methods and Procedures

7. Initial VE compliance testing for the new Heidelberg M600 press shall be conducted within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup in accordance with Environmental Protection Agency (EPA) Reference Method (RM) 9 (as described in 40 CFR 60, Appendix A) and annually thereafter.
   [Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB

8. VE testing for the new Heidelberg Press M600 shall be conducted for a minimum period of 30 minutes.
   [Rule 62-297.310(4)(a)2, FAC, and Rule 2.1201, JEPB]

9. VOC mass flow rate and VOC concentrations at the inlet and outlet of the RTO shall be measured simultaneously to determine the percent reduction of VOC across the RTO.
   [Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

10. Testing for demonstration of compliance for VOC destruction efficiency shall be conducted in accordance with EPA RM 25A (as described in 40 CFR 60, Appendix A).
    [Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

11. Initial testing for demonstration of compliance for VOC destruction efficiency shall be conducted while the new Heidelberg M600 printing press and the two existing presses under Emission Unit No. 005 are operating.
[Rule 62-407(3), FAC, and Rule 2.1401, JEPB]

12. Testing for demonstration of compliance for VOC capture efficiency shall be conducted in accordance with applicable EPA RM's (204A thru 204F as described in 40 CFR 51, Appendix M).
[Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

13. Initial testing for demonstration of compliance for VOC capture efficiency shall be conducted while the new Heidelberg Press M600 and the two existing presses under Emission Unit No. 005 are operating.
[Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

Recordkeeping and Reporting

14. The permittee shall install, calibrate, maintain, and operate a continuous temperature measurement and recording device for measuring and recording the temperature at the outlet of the RTO. These records shall be maintained for a period of five (5) years and made available to the Permitting Authority upon request.
[Rule 62-4.070, FAC, and Rule 2.1401, JEPB]

15. The permittee shall produce monthly records for the following:

    a. The quantity and type of inks applied (pounds per month)
    b. The VOC and HAP content of inks applied (% by weight)
    c. The quantity of fountain solution, blanket wash, clean-up and wash-up solvent/thinner usage (pounds per month)
    d. The VOC and HAP content of fountain solution, blanket wash, clean-up and wash-up solvent/thinner (% by weight)
    e. The VOC and HAP emission calculations for the calendar month using data collected and test results
    These records will be retained for a minimum period of five (5) years from the date created.

    [Rule 62-210.370(2)(h), FAC, and Rule 2.301, JEPB]

16. The twelve-month rolling total of VOC and HAP emissions shall be calculated monthly. These records will be retained for a minimum period of five (5) years from the date created.
[Rule 62-4.070, FAC, and Rule 2.1401, JEPB]

17. The permittee shall submit quarterly reports to the Permitting Authority of the monthly records produced for all periods the temperature falls below 1400 degrees Fahrenheit at the outlet of the RTO, material usage, emission calculations, and the twelve-month rolling total of VOC and HAP emissions. The quarterly reports shall be submitted by the 30th day of the month following the end of each quarter (January - March, April - June, July - September, and October - December).
[Rule 62-4.070, FAC, and Rule 2.1401, JEPB]