PCC Print Shop, Inc.
PCC Print Shop
Facility ID No.: 0330271
Escambia County

Air Operation Permit
Permit No.: 0330271-006-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W Government Street, Suite 308
Pensacola FL 32502-5740
Telephone: 850.595.8300
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[Electronic file name: 0330271-006-AO.doc]

Air Operation Permit
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VOC Testing Letter Dated April 17, 1990

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Northwest District
160 W Government St., Suite 308
Pensacola, Florida 32502-5740

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Permittee:
PCC Print Shop Inc

Permit No.: 0330271-006-AO
Facility ID No.: 0330271
SIC No.: 2731
Project: Air Operation Permit

This renewal permit is for the operation of the PCC Print Shop located at 118 Saint John Street, Pensacola, Escambia County; UTM Coordinates: Zone 16, 477.77 km East and 3371.02 km North; Latitude: 30° 28' 22" North and Longitude: 87° 14' 02" West.

STATEMENT OF BASIS: This 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 and 62-210. 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 permitting authority, in accordance with the terms and conditions of this permit.

Effective Date: January 3, 2013
Renewal Application Due Date: November 4, 2017
Expiration Date: January 3, 2018

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
/Armando Sarasua signed for/

Rick Bradburn
Air Program Administrator

RB/rp/c

Section I. Facility Information

This is a renewal of air operation permit 0330271-005-AO, issued January 28, 2008.

Subsection A. Facility Description

This facility consists of two Offset Printing Web Presses, three Offset Printing Sheet Presses, Roller Cleaning activities for sheet-fed printing and web printing presses, and Book Binding activities.

Offset Printing Web Press No. 1 (EU 001) is a FIMAG (nebilo) Model Chroma 45 with a Thermo Electron Thermofoil drying system (OF-4762, Model 2004). Volatile Organic Compounds (VOC) emissions from this press are controlled by a Thermo Electron Model 2000 Thermocat Catalytic system with a 90% VOC destruction efficiency of the VOC captured.

Offset Printing Web Press No. 2 (EU 002) is a Heidelberg Model Sunday 2000 with a Contiweb Ecotherm 121-1020 dryer/afterburner. The dryer/afterburner has a 95% VOC destruction efficiency of the VOC captured.

The inks utilized by the two offset printing web presses contain VOC, but do not contain Hazardous Air Pollutants (HAP), verified by a Web Prestige Inks, LTD letter dated February 14, 2000.

The facility also operates three Offset Printing Sheet-Fed Presses, Roller Cleaning activities, and Book Binding (EU 003). Offset Printing Sheet-Fed Press #1 is a Heidelburg two-color press, Offset Printing Sheet-Fed Press #2 is a Heidelberg five-color press, and Offset printing Sheet-Fed Press #3 is an eight-color press. Inks, cleaners and glues, having VOC and HAP, are used to print materials, clean presses and bind books, with fugitive emissions released uncontrolled into the building and to the atmosphere. VOC emissions from three Offset Printing Sheet Fed Presses, Roller Cleaning for sheet fed printing, and Book Binding operations for web printing (EU 003) are estimated at 50 ton/year. Individual HAP emitted are less than 1,000 lb/yr and total HAP emitted are less than 2,500 lb/yr, making HAP emissions exempt from permitting by Rule 62-210.300(3)(b)1, F.A.C.

The facility maintains monthly usage records of products having VOC and HAP and rolling 12-month totals for usage and emissions. Ink (based on an average VOC content of 43%) is limited by Permittee to 30 lb/hr for Offset Printing Web Press No. 1 (EU 001) and 50 lb/hr for Offset Printing Web Press No. 2 (EU 002).

Although this facility is located on the Pensacola Christian College campus, it is operating as an independent company and is no longer part of the Pensacola Christian College Title V permit.

Estimated facility-wide annual emissions (ton/year):

Emissions Unit	NO_X	SO_2	CO	PM	VOC	Total HAPS
Offset Press #1 (EU 001)	0.67	0.00	0.57	0.05	6.26[2]	N/A
Offset Press #2 (EU 002)	0.51	0.00	0.43	0.04	5.21[3]	N/A
EU 003	N/A	N/A	N/A	N/A	50.0[1]	Neg.
TOTAL	1.18	0.00	1.00	0.09	61.47	Neg.

1 - Not a specific emission limit of this permit; compliance verification through recordkeeping.
2 - 6.22 Ton/Year of VOC from ink usage and 0.04 Ton/Year from natural gas combustion (catalyst & paper dryer).
3 - 5.18 Ton/Year of VOC from ink usage and 0.03 Ton/Year from natural gas combustion (catalyst & paper dryer).
Neg. - Less than 1,000 lb/yr of any individual HAP or 2,500 lb/yr of combined HAPS.

Based on the permit application received November 28, 2012, this facility not a major source of HAP.

Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions

EU I.D.	Brief Description
001	Offset Printing Web Press No. 1
002	Offset Printing Web Press No. 2
003	Offset Printing Sheet-Fed Presses, Roller Cleaning, & Book Binding

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:
Permit Application (EPSAP No. 3385) received November 28, 2012

Section II. Facility-wide Conditions

The following conditions apply facility-wide:

1. All listed Appendices are part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standards contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests that identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rule 62-297.310(7)(b), F.A.C., and Permit 0330271-003-AC]

5. Prevention of Accidental Releases (Section 112(r) of CAA).

a. As required by rule, inspection, or change in process the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.

b. The owner or operator shall report to the Department of Community Affairs (DCA) within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the USEPA/Chemical Safety Hazard Investigation Board or the National Response Center under Section 112(r)(6).

c. The owner or operator shall submit the required annual registration fee to the DCA on or before June 21, 1999 and on April 1 annually thereafter, in accordance with Part IV, Chapter 252, F.S., and Rule 9G-21, F.A.C.

6. An Annual Operating Report for Air Pollutant Emitting Facility, DEP Form 62-210.900(5), shall be submitted for each year by April 1 of the following year. A copy of the form and instructions may be obtained from the Department's Northwest District office or electronically at http://www.dep.state.fl.us/air/rules/forms/aor.htm. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office. [Rule 62-210.370(3)(c), F.A.C.]

7. General Pollutant Emission Limiting Standards. 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, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. This includes but is not limited to covering all tanks, vats, containers, etc., that are used for temporary and permanent

storage of VOC/organic solvents when not in use to prevent vaporization of VOC. [Rule 62-296.320(1), F.A.C., and permit 0330271-003-AC]

8. 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) Paving and maintenance of roads, parking areas and yards.
b) Landscaping or planting of vegetation.

[Rule 62-296.320(4)(c), F.A.C., and permit 0330271-003-AC]

8. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit four permit renewal applications using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department. You can obtain a permit application form or apply for permit renewal electronically at the following web address: http://www.dep.state.fl.us/air/emission/permitting.htm. [Rule 62-4.090, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District Office:

Department of Environmental Protection
Northwest District Office
160 W Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850.595.8300; Fax: 850.595.8096

Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us.

10. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850.595.0578, day or night, and for emergencies involving a significant threat to human health or the environment is 800.320.0519. For routine business, telephone 850.595.8300 during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Units and Conditions

Subsection A. This section addresses the following emissions unit

EU I.D.	Brief Description
001	Offset Printing Web Press No. 1

Offset Printing Web Press No. 1 is a FIMAG (nebilo) Model Chroma 45 with a Thermo Electron Thermofoil drying system (OF-4762, Model 2004). Permittee has a self-imposed ink usage limit of 30 lb/hr (based on an average VOC content of 43%), rather than calculating monthly and rolling 12-month totals of VOC. This usage limit results in a maximum of 1.42 lb/hr or 6.2 tons/yr of VOC emissions (90% VOC destruction from the thermal catalytic controller of the captured VOC) for inks used, which do not contain HAP. VOC emissions from combustion of natural gas in the dryer/afterburner are estimated at 0.04 tpy. Compliance is demonstrated with annual VOC testing (using a Thermo Environmental VOC analyzer model 580B or equivalent) and monthly ink usage. Offset Printing Web Press No. 1 is regulated by Rules 62-210.300 and 62-296.320(1), F.A.C.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum allowable operating rate for Offset Printing Web Press No. 1 is 30 pounds of ink consumed per hour. [Permit 0330271-003-AC]
{Permitting Note: Compliance with this limit is based on monthly averages of ink used.}

A.2. Methods of Operation - (i.e., Fuels). The ThermoElectron Thermofoil drying system and Thermocat Catalytic pollution control device shall be fueled by natural gas or LP and shall be operated at all times during operation of Offset Printing Web Press No. 1. [Rules 62-4.160(2) and 62-213.440(1), F.A.C. & Permit 0330271-003-AC]

A.3. 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(PTE), F.A.C.]

Emission Limitations and Standards

A.4. Volatile Organic Compounds (VOC) emissions shall not exceed 1.42 pounds per hour (averaged over test duration) for Offset Printing Web Press No. 1. [Permit 0330271-003-AC]
{Permitting Note: Although visible emissions less than 20% opacity comply with the general pollutant emission limiting standard (facility-wide condition 3), visible emissions greater than 5% opacity may suggest the presence of unacceptable operational problems.}

Test Methods and Procedures

A.5. Emissions Tests: See Subsection D. Common Conditions, Test Methods and Procedures.

Recordkeeping and Reporting Requirements

A.6. Recordkeeping: See Subsection D. Common Conditions, Recordkeeping Requirements.

Subsection B. This section addresses the following emissions unit

EU I.D.	Brief Description
002	Offset Printing Web Press No. 2

Offset Printing Web Press No. 2 is a Heidelberg Model Sunday 2000 with a Contiweb Ecotherm 121-1020 dryer/afterburner. Permittee has a self-imposed ink usage limit of 50 lb/hr (based on an average VOC content of 43%), rather than calculating monthly and rolling 12-month totals of VOC. This usage limit results in a maximum of 1.21 lb/hr or 5.3 tons/yr of VOC emissions (95% VOC destruction from thermal catalytic controller of VOC captured) for inks used, which do not contain HAP. VOC emissions from combustion of natural gas in the dryer/afterburner are estimated at 0.03 tpy. Compliance is demonstrated by annual VOC emission testing (using a Thermo Environmental VOC analyzer model 580B or equivalent) and monthly ink usage. Offset Printing Web Press No. 2 is regulated by Rules 62-210.300 and 62-296.320(1), F.A.C.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Capacity. The maximum allowable operating rate for Offset Printing Web Press No. 2 is 50 pounds of ink consumed per hour. [Permit 0330271-003-AC]
{Permitting Note: Compliance with this limit is based on monthly averages of ink used.}

B.2. Methods of Operation - (i.e., Fuels). The Contiweb Ecotherm 121-1020 dryer and afterburner pollution control device shall be fueled by natural gas or LP and shall be operated at all times during operation of Offset Printing Web Press No. 2. [Rules 62-4.160(2) and 62-213.440(1), F.A.C. & Permit 0330271-003-AC]

B.3. 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(PTE), F.A.C.]

Emission Limitations and Standards

B.4. Volatile Organic Compounds (VOC) emissions shall not exceed 1.21 pounds per hour (averaged over test duration) for Offset Printing Web Press No. 2. [Permit 0330271-003-AC]
{Permitting Note: Although visible emissions less than 20% opacity comply with the general pollutant emission limiting standard (facility-wide condition 3), visible emissions greater than 5% opacity may suggest the presence of unacceptable operational problems.}

Test Methods and Procedures

B.5. Emissions Tests: See Subsection D. Common Conditions, Test Methods and Procedures.

Recordkeeping and Reporting Requirements

B.6. Recordkeeping: See Subsection D. Common Conditions, Recordkeeping Requirements.

Subsection C. This section addresses the following emissions unit

EU I.D.	Brief Description
003	Offset Printing Sheet Fed Presses, Roller Cleaning & Book Binding

This emissions unit consists of a two-color Heidelberg Offset Printing Sheet-Fed Press (#1), a five-color Heidelberg Offset Printing Sheet-Fed Press (#2), an eight-color Heidelberg Offset Printing Sheet-Fed Press (#3), Roller Cleaning activities for sheet and web presses, and Book Binding activities. VOC and HAP emissions from these sources are released into the building and exhaust to the atmosphere uncontrolled. VOC emissions from these sources are estimated at 50 tons/year. Individual and Total HAP emissions are estimated less than 1,000 lb/yr and less than 2,500 lb/yr, respectively. Recordkeeping ensures VOC and HAP emissions are below Title V Source levels. Offset Printing Sheet Fed Presses, Roller Cleaning, & Book Binding are regulated by Rules 62-210.300 and 62-296.320(1), F.A.C.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

C.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(PTE), F.A.C.]

Recordkeeping and Reporting Requirements

C.2. The permittee shall maintain records sufficient to verify VOC and HAP emissions. This shall include, at a minimum: monthly records of VOC- and HAP-containing product usage (ink, cleaners, glues, etc.) and rolling 12-month totals of product usage and VOC/HAP emissions. These records shall be kept for a minimum of three years and be made available for inspection by the Department upon request. [Rule 62-4.160(14), F.A.C., and Permit 0330271-003-AC}

Subsection D. Common Conditions

EU I.D.	Brief Description
001	Offset Printing Web Press No. 1
002	Offset Printing Web Press No. 2

The following specific conditions apply to the emissions units listed above:

Test Methods and Procedures

D.1. VOC control device efficiency tests using a Thermo Environmental VOC analyzer model 580B or equivalent shall be conducted annually on Offset Printing Web Press No. 1 and Offset Printing Web Press No. 2 in accordance with a letter dated April 17, 1990 (attached). Records of the catalyst efficiency tests and catalyst change outs shall be maintained and be available for inspection by the Department. A 30-minute VOC test shall be conducted, for each Offset Printing Web Press, during each calendar year (January 1 - December 31), generally in six-month intervals. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing. [Pensacola Christian College Permit AC17-178415; Pensacola Christian College letter dated April 17, 1990; Pensacola Christian College Permit Amendment Letter date November 1, 1995; Pensacola P.O.C., Inc., letter dated February 22, 2000; letter dated January 13, 2010; and, Permit 0330271-003-AC]

D.2. Test reports shall comply with Rule 62-297.310(8), F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7)(b), F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

Conditions during the required tests shall be representative of routine printing operations. Maximum rates may not be achievable during testing since this would require both maximum ink usage rates and maximum content VOC inks. (These conditions are determined by the materials being published.) It is not intended that printing of special test (non-usable) materials be performed during the test in order to attain the maximum rates. However, the permittee shall make every reasonable effort to schedule the tests during the printing of materials that are representative of heavy ink usage rates. [Rule 62-297.310(7) and (8), F.A.C., and Permit 0330271-003-AC]

Record keeping Requirements

D.3. The permittee shall maintain records sufficient to verify compliance with the conditions of Subsections A and B of this permit. This shall include, at a minimum: monthly records of ink usage and operational hours for each Web Printing Press, and routine maintenance and repair of the pollution control devices (i.e., catalyst replacement). These records shall be kept for a minimum of three years and be made available for inspection by the Departmental upon request. [Rule 62-4.160(14), F.A.C. and Permit 0330271-003-AC]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department 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 Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, 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 the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does 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 Department rules, unless specifically authorized by an order from the Department.

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, are required by Department 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 Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department 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 for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this 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 Department 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 Department with the following information:

a. A description of and cause of noncompliance; and
b. The period of noncompliance, including exact 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 that may result and may be subject to enforcement action by the Department for penalties or for 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 Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department 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 Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.

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

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

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 the 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 Department rule.

c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- the results of such analyses.

14. When requested by the Department, 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 Department, such facts or information shall be corrected promptly.