M E M O R A N D U M

DATE: September 10, 2012

TO: Richard D. Garrity, Ph.D.

FROM: Lora Webb **THRU:** Diana M. Lee, P.E.
Sterlin Woodard, P.E.

SUBJECT: Operating Permit Renewal – Media General Operations, Inc., The Tampa Tribune Permit No. 0570289-013-AO

Attached is the Renewal Operating Permit No. 0570289-013-AO for the operation of a web offset lithographic printing operation at a newspaper printing facility, Media General Operations, Inc., The Tampa Tribune. The facility is located at 202 South Parker Street, Tampa, FL. The operation consists of four printing presses. All four presses were installed in approximately 1986 and are all TKS, Model No. M72, presses. Each press can print approximately 60,000 pages per hour and can print only one side of the paper at a time. The presses run on electricity provided by TECO.

The four presses are offset printing presses. Ink is applied to an engraved plate and the plate transfers the ink to a rubber roller called a blanket. The blanket then transfers the ink to the newspaper. After printing is completed, the blankets are manually cleaned with a blanket wash to ensure that all of the ink has been removed from the blanket. The ink is stored in eight storage silos and pumped to the presses as needed. Black ink is received at the facility by truck and pumped to the storage silo(s). The other colors are received in ink totes and pumped to the storage silo(s) as needed. The used blanket wash, used cleaning towels, and other miscellaneous used materials are stored in covered drums and shipped offsite for disposal.

The volatile organic compound (VOC) emissions generated from the printing operation are vented uncontrolled to the atmosphere through the building ventilation system. The VOC emissions are controlled by limiting the material usages and through the use of low vapor pressure cleaning solvents. The VOC PTE for the printing operation is 47.2 tons/year.

The facility also operates a 750 HP Caterpillar, Model No. 3412, diesel fuel fired emergency

generator manufactured in 2000. The engine is categorically exempt per Rule 62-210.300(3)(a)(35), F.A.C., however, it is subject to 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The unit is exempt from 40 CFR 60 Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines because the engine was manufactured prior to April 1, 2006.

In addition, the facility has a lint collection system for printing presses “B” and “C.” Particulate matter emissions from the folding, slitting, and cutting of the newspapers on these two presses are vented to two 5,200 ACFM Flex-Kleen Model 50-WRA-48-6S Dust Collectors designated as “B” and “C,” respectively. The lint collection system has been determined to be exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C.

No complaints or warning notices have been issued to the facility in the past five years.

Based on our review, we recommend issuance of the permit as drafted.

LAW: 0570289-013-AO

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

William R. Baker
Vice President, Operations
Media General Operations, Inc.
The Tampa Tribune
P.O. Box 191
Tampa, FL 33601-0191
_____/

File No.: 0570289-013-AO
County: Hillsborough

Enclosed is Permit No. 0570289-013-AO for the operation of a web offset lithographic printing operation, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of receipt of this permit. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication.

A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;
(b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
(c) A statement of how and when the petitioner received notice of the EPC action;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;
(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for

additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Drive, Tampa, Florida 33619 and 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____

Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

cc: Cory A. Houchin, P.E. - Environmental Sciences Group, Inc.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statues, with the clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

PERMITTEE:	PERMIT/CERTIFICATION
Media General Operations, Inc.	Permit No.: 0570289-013-AO
The Tampa Tribune	County: Hillsborough
P.O. Box 191	Expiration Date: September 10, 2017
Tampa, FL 33601-0191	Project: Web Offset Lithographic Printing Operation

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. 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 EPC and made a part hereof and specifically described as follows:

Media General Operations, Inc. operates a web offset lithographic printing facility, which includes four printing presses and associated cleanup. The four presses, designated as Presses “B”, “C”, “E” and “F”, are used to print newspapers. Each press is a TKS double width offset, Model No. M72, unit and can print only one side of the paper at a time.

The four presses are offset printing presses. Ink is applied to an engraved plate and the plate transfers the ink to a rubber roller called a blanket. The blanket then transfers the ink to the newspaper. After printing is completed, the blankets are manually cleaned with a blanket wash to ensure that all of the ink has been removed from the blanket. The ink is stored in eight storage silos and pumped to the presses as needed. Black ink is received at the facility by truck and pumped to the storage silo(s). The other colors are received in ink totes and pumped to the storage silo(s) as needed. The used blanket wash, used cleaning towels, and other miscellaneous used materials are stored in covered drums and are shipped offsite for disposal.

The volatile organic compound (VOC) emissions generated from the printing operation are vented uncontrolled to the atmosphere through the building ventilation system. The VOC emissions are controlled by limiting the material usages and through the use of low vapor pressure cleaning solvents.

The facility also operates a 750 HP Caterpillar, Model No. 3412, diesel fuel fired emergency generator manufactured in 2000. The engine is categorically exempt per Rule 62-210.300(3)(a)(35), F.A.C., however, it is subject to 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Location: 202 South Parker Street, Tampa UTM: 17-356.30 E 3091.70 N

NEDS No.: 0570289

Emission Unit No.: EU No. 004 – Four Printing Presses

References Permit No.: 0570289-009-AC

Replaces Permit No.: 0570289-011-AO

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions. [Rule 62-4.160, F.A.C.]

2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations. [Rule 62-4.070(7), F.A.C.]

3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

4. As requested by the permittee, in order to limit the potential to emit and establish the facility as a minor source for both criteria and Hazardous Air Pollutants (HAP), the following emission limitations shall apply: [Rules 62-4.070(3) and 62-210.200(247), F.A.C. and Permit No. 0570289-009-AC]

A) The maximum VOC emissions from the entire facility shall not exceed 47.2 tons for any 12 consecutive month period.
B) The HAP emissions, as defined in Rule 62-210.200, F.A.C., shall be less than 10 tons in any 12 consecutive month period for any individual HAP, and less than 25 tons in any 12 consecutive month period for any combination of HAPs.

5. 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), F.A.C.]

6. In order to demonstrate compliance with Specific Condition No. 4, the following restrictions and limitations shall apply per any twelve (12) consecutive month period: [Rule 62-4.070(3), F.A.C. and Permit No. 0570289-009-AC]

A)

Material	Maximum Usage
Printing Inks	2,500,000 pounds
Blanket Wash	3,000 gallons
Cleaning Solvent	11,000 gallons

B) Whenever practical, the permittee shall use low solvent soy based inks.
C) All VOC emissions shall be calculated using the actual material usage and the corresponding VOC content, except for the VOC emissions from ink, which shall utilize a 95% newsprint retention factor.

7. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rule 62-296.320(1), F.A.C.]

A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled,

tapped, etc.

B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
C) Immediately attend to all spills/waste as appropriate.

8. [Reserved]

9. Compliance with the limitations specified in Specific Condition Nos. 4 and 6 shall be demonstrated through the use of a monthly recordkeeping system. The records shall be maintained onsite for three years and shall be made available to any local, state, or federal air pollution agency upon request. The records shall include, but not limited to, the following: [Rules 62-4.070(3), F.A.C.]

A) Month, year
B) The amount and type of blanket wash and cleaning solvent used (in gallons)
C) The amount and type of inks used (in pounds)
D) The VOC content for each material used in B) and C)
E) A rolling twelve month total of the usages specified in B) and C) above
F) A rolling twelve month total of the facility wide VOC emissions
G) Amount of cleaning solvent disposed, as liquid, to the waste stream.
H) For each material used, maintain a copy of the manufacturer's data sheet(s) and make it available upon request.

10. Compliance with the emission limitations of Specific Condition No. 4 shall be determined using EPA Method 24 or Method 24A contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The Department may accept, instead of the coating analysis methods required under Rules 62-296.500(2)(b)2. and 3., F.A.C., a certification by the coating manufacturer of the composition of the coating if it is supported by actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings." [Rule 62-296.500(2)(b)4., F.A.C.]

11. No alterations shall be made to this facility which have the potential to increase or change the type of air pollutant emissions without prior written approval from the Environmental Protection Commission of Hillsborough County. This shall include a material substitution which results in the emissions of any of the hazardous air pollutants as defined in Rule 62-210.200, F.A.C. [Rule 62-4.070(3), F.A.C. and Permit No. 0570289-009-AC]

12. The permittee may request a modification to this permit by properly applying to the Environmental Protection Commission of Hillsborough County. [Rule 62-4.080(2), F.A.C. and Permit No. 0570289-009-AC]

13. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-

SPECIFIC CONDITIONS:

296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. For the purpose of confirming compliance with the emission limitations in this permit, the EPC may require the use of EPA Methods 18 and 24 or other approved methods, as deemed necessary. [Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C. and Permit No. 0570289-009-AC]

14. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

15. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3)(c)., F.A.C.]

16. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

17. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director