FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Better Business Forms, Inc. dba
The Clondalkin Group
10950 Belcher Road South
Largo, FL 33777

Air Permit No. 1030264-007-AC
Permit Expires: 08/31/2014
Largo Plant
Minor Air Construction Permit
Add Lithographic Offset Printing Press

Authorized Representative:
Mr. Mike Barrett, Vice President of Business Development

This is the final air construction permit to install an offset lithographic printing press and to remove four of the six currently permitted flexographic presses. The proposed work will be conducted at the Better Business Forms, Inc., Largo Plant (Standard Industrial Classification No. 2752). The facility is located in Pinellas County at 10950 Belcher Road South in Largo, Florida. The UTM coordinates are Zone 17, 328.08 km East, and 3084.02 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

_____ _____

Kelley M. Boatwright
District Air Program Administrator
Southwest District

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

Mr. Mike Barrett, Vice President of Business Development
Better Business Forms, Inc.
mbarrett@clondalkingroup.com

Mr. Christopher G. Stirrat, P.E.
Environmental Safety Consultants, Inc.
escinc@verizon.net

Mr. Gary Robbins, Environmental Program Coordinator
Pinellas County Air Quality Division
grobbins@pinellascounty.org

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

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This is a printing and publishing facility. The existing facility consists of the following emissions unit (EU).

Facility ID No. 1030264	
EU ID No.	**Emissions Unit Description**
001	Printing Facility (Lithographic and Flexographic)

Project Description and Affected Emission Unit

This project is to add a KBA Karat74 four-color offset lithographic printing press that uses soy-based, air cured inks and to remove four of the six flexographic presses that use water based inks. It also removes the lb/hour VOC emission limit and associated recordkeeping requirement. Actual volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions will be reduced by this project; however, the currently permitted emission limits will not change. This project will modify the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Printing Facility (Lithographic and Flexographic)

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The emission limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source. Exceeding the permitted limits for HAPs and/or VOCs (*see Specific Condition No. A.2.*) may subject the facility to the requirements of Title V permitting and 40 CFR 63, Subpart KK- National Emission Standard for Hazardous Air Pollutants for the Printing and Publishing Industry.

PERMIT HISTORY/AFFECTED PERMITS

This permit modifies and replaces Construction Permit No. 1030264-003-AC.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to Pinellas County Air Quality Division. The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, Florida 33760
Telephone: 727-464-4422

3. Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;

b. Appendix B. General Conditions;

c. Appendix C. Common Conditions; and

d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit - This permit authorizes construction and modification of the permitted emissions units and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

c. copies of the most recent month of records/logs specified in Specific Condition No. A.5.

The application shall be submitted to the Permitting Authority with a copy to the Pinellas County Air Quality Division (Compliance Authority).

[Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]

A. EU No. 001 Printing Facility (Lithographic and Flexographic)

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Printing Facility (Lithographic and Flexographic) - printing and publishing facility with the capability to print with flexographic inks, ultraviolet (UV) cured inks, graphic inks, and lithographic inks. The facility consists of 21 printing presses of the following types:

Printing Press Type	Ink Type	Number of Presses
Lithographic web press	UV-cured	9
Flexographic press	water-based	2
Flexographic press	UV-cured	4
Flexographic press w/ one UV station	water-based	2
Lithographic sheet fed press	UV-cured	1
[1] Lithographic sheet fed press	soy-based	1
Lithographic web press	soy-based	1
Silkscreen press	solvent or UV-cured	1

All emissions are fugitive and there are no stacks or vents on the presses. The UV Presses have a six color capability to print with either UV-cured inks or soy-based air-cured graphic inks. Volatile organic compound (VOC) and organic solvent (OS) emissions from all printing inks and clean-up operations are fugitive and uncontrolled (i.e., no control equipment). Ventilation hoods and associated exhaust stacks are used primarily to provide building ventilation and to remove the heat associated with the UV ink curing lamps.

[1] Printing press added by this construction permit.

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 ("Potential to Emit"), F.A.C.]

EMISSIONS STANDARDS

A.2. Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emission Limitations - the following emission limits apply to all VOC and HAP containing materials used at the facility:

Pollutant	Facility-wide Emission Limits (tons per any consecutive 12-month period)
Total Volatile Organic Compounds (VOC)	49.0
Any Individual Hazardous Air Pollutant (HAP)	9.0
Total Hazardous Air Pollutants (HAP)	18.0

[Rule 62-210.200 ("Potential to Emit"), F.A.C.]

NOTIFICATION REQUIREMENTS

A.3. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the new KBA Karat74 offset printing press after completing the modifications authorized by this permit, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose. [Rules 62-4.070, and 62-210.200, F.A.C., ("Commence Operation")]

A.4. Plant Malfunction - If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Pinellas County Air Quality Division. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. For purposes of notification to the Pinellas County Air Quality Division, "immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays. [Rules 62-4.070(3) and 62-4.130, F.A.C.]

RECORDKEEPING REQUIREMENTS

A.5. VOC and HAP Recordkeeping - The permittee shall keep monthly logs to document compliance with the VOC and HAP limitations of Specific Condition No. A.2. The permittee shall record and calculate, at a minimum, the following:

a. facility name, Facility ID No., Emission Unit ID No., source description, date (month, day, and year), and operator initials for each measurement;

b. name or identification number of each ink, coating, solvent, or other HAP/VOC containing material used during the month and the amount of each material used, in gallons;

c. HAP (individual and total) content and VOC content, in pounds per gallon for each material listed in A.5.b., above;

d. facility-wide HAP (individual and total) and VOC emissions for the most recent month, in tons per month; and

e. facility-wide HAP (individual and total) and VOC emissions for the most recent consecutive 12-month period, in tons per consecutive 12-month period.

Supporting documentation ("As Supplied" and "As Applied" sheets, Material Safety Data Sheets (MSDS), purchase orders, USEPA "VOC Data Sheets", etc.) shall be kept for each ink, coating, solvent and other material used in the printing operations which includes sufficient information to determine HAP and VOC emissions.

VOC content of materials may also be determined by using EPA Method 24 or 24A contained in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-297, F.A.C. New materials, or the same material supplied by a different manufacturer, shall be tested for VOC content using EPA Method 24, 24A, or the above-mentioned certification prior to use.

Should the permittee wish to claim credit for solvent disposed of as hazardous waste, the HAP and VOC content of the waste must also be determined. Documentation of solvents consumed, such as during

cleanup, may use a mass balance method to determine usage (amount used minus amount collected for disposal or recycle.

Monthly records shall be completed by the tenth day of the following month. All records shall be retained on file at the facility for at least three (3) years and shall be made available to the Department and the Pinellas County Air Quality Division upon request.

[Rules 62-4.160(14)(b) and 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90]