**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**
SOUTHWEST DISTRICT OFFICE
13051 NORTH TELECOM PARKWAY
TEMPLE TERRACE, FLORIDA 33637-0926

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

CLIFFORD D. WILSON III
INTERIM SECRETARY

# FINAL PERMIT

**PERMITTEE**
Precision Litho Service, Inc.
4250 118th Avenue North
Clearwater, Florida 33762

Authorized Representative:
Terry Olsen, Vice President

Air Permit No. 1030500-004-AO
Permit Expires: 12/12/2019
Minor Air Operation Permit
Project: Air Operation Permit Renewal

This is the final permit to renew Air Operation Permit No. 1030500-003-AO for a lithographic printing facility engaged in commercial wholesale lithographic printing. Precision Litho Service, Inc., (Standard Industrial Classification No. 2752), is located in Pinellas County at 4250 118th Avenue North in Clearwater, Florida. The UTM coordinates are Zone 17, 333.50 km East, and 3084.88 km North.

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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this final permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline. 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority'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, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (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 agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority'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, F.A.C.

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

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 Hillsborough County, Florida

_____ _____

Kelley M. Boatwright Effective Date
Permitting & Waste Cleanup Program Administrator
Southwest District

## CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including 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.

Terry Olsen, Precision Litho Service, Inc. (terry@plsprint.com)

Sherrill Culliver, Pinellas County Air Quality Division (sculliver@co.pinellas.fl.us)

Clerk Stamp

**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

The facility operates two (2) web printing presses, three (3) sheet fed printing presses, and a heatset web printing press. A fourth sheet fed press is used for perforating paper, not printing.

The facility also operates other exempt air emission sources including plate making, pre-press, and bindery operations that support the printing operations; and emissions resulting from combustion of natural gas in the heat set press drying ovens and thermal oxidizer. Paper cutting from the web presses and other cutting and bindery operations are ducted to an internal dust collector which vents within the building (i.e. no external discharge).

The existing facility consists of the following emissions unit (EU).

| Facility ID No. 1030500 | |
|---|---|
| **EU ID No.** | **Emissions Unit Description** |
| 001 | Lithographic Printing Facility |

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

### Exempt Emission Sources/Activities

1. The following sources/activities are exempt pursuant to Rule 62-210.300(3)(b)1, F.A.C. (Generic Emissions Unit or Activity Exemption):
   - Plate Making Operations
   - Pre-press Operations
   - Bindery Operations
   - Paper Cutting Operations (internal vent dust collector)

2. Natural gas combustion associated with the heat set press drying ovens and thermal oxidizer is exempt pursuant to Rule 62-210.300(3)(a)33, F.A.C.

   *{Note: This includes the two natural gas fired 1.6 MMBtu/hour drying ovens associated with the facility's Heidelberg Harris M-110 heat set printing press and the 3.72 MMBtu/hour TEC System Diablo #1250S Thermal Oxidizer.}*

## 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)

## PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1030500-003-AO

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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

Florida Department of Environmental Protection
Southwest District Office
Air and Solid Waste Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air_Permitting@dep.state.fl.us

All documents related to applications for permits shall be submitted to the above email 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 (PCAQD). 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 33756
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.** Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to the Pinellas County Air Quality Division (Compliance Authority) no later than 60 days prior to the expiration date of this operation permit. To properly apply for an 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.;

c. copies of the most recent compliance test reports required by Specific Condition No. A.6., if not previously submitted;

d. copies of the most recent month of records/logs specified in Specific Condition No. A.12.; and

e. any proposed revisions to the most recently approved O & M Plan *(see Specific Condition No. A.14)*.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

## A. EU No. 001 – Lithographic Printing Facility

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

| EU ID No. | Emissions Unit Description |
|---|---|
| 001 | Lithographic Printing Facility - including printing, drying, a thermal oxidizer, cutting, binding, & cleaning.<br><br>The printing operations consist of two (2) Didde MVP UV web printing presses, two (2) Komori sheet fed printing presses, one (1) Heidelberg sheet fed printing press, and a Heidelberg Harris M-110 heat set printing press. (An existing Miehle sheet fed press is not used for printing.) The two Didde web presses utilize low (<0.1%) VOC inks. The maximum web width of these presses is 17.5 inches. The presses typically operate at an average web speed of 600 feet per minute and are rated at a maximum of 800 feet per minute.<br><br>The Heidelberg Harris M-110 heat set printing press is equipped with two drying ovens and a thermal oxidizer. Each of the two drying ovens (used for drying the ink) is equipped with a natural gas fired burner with a nominal heat input rating of 1.6 MMBtu/hour. The TEC Systems Diablo #1250S thermal oxidizer has an operating temperature of approximately 650°F and is used only for the control of visible emissions and odor. This unit is natural gas fired with a heat input rating of 3.72 MMBtu/hour. The maximum web width of this press is 17.75 inches. This press typically operates at an average web speed of 750 feet per minute and is rated at a maximum of 1000 feet per minute.<br><br>*{Permitting Note: Use of a thermal oxidizer to control VOC and HAP emissions from the heat set printing press is not required by this permit. The calculation of VOC and HAP emissions from this facility will not take into account any emissions reductions achieved by the use of the thermal oxidizer on the heat set press. The thermal oxidizer is used to control visible emissions and odor.}* |

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

### EMISSIONS STANDARDS

**A.2.** VOC and HAP Emissions Limits -The following emission limits on volatile organic compounds (VOC) and Hazardous Air pollutants (HAPs), as defined in Rule 62-210.200, F.A.C., shall apply:

| Pollutant | Emission Limits (tons/any consecutive 12 month period) |
|---|---|
| Total Volatile Organic Compounds (VOC) | 38.0 |
| Total Hazardous Air Pollutants (HAP) | 8.0 |

[Rule 62-210.200(PTE), F.A.C. and Construction Permit 1030500-001-AC]

**A.3.** Visible Emissions (VE) from Heat Set Press Thermal Oxidizer - No visible emissions (5% opacity) are allowed from the heat set press thermal oxidizer except that visible emissions not exceeding 20% opacity are allowed for up to three minutes in any one-hour period.
[Construction Permit 1030500-001-AC]

**A.4.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited - No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2), and 62-296.401(1)(b), F.A.C. & Pinellas County Code, Section 58-178]

**A.5.** 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 organic solvents (OS) without applying known and existing vapor-emission control devices or systems deemed necessary and ordered by the Department.

a. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials.
b. All VOC/OS from washings (equipment clean up) shall be directed into containers that prevent evaporation into the atmosphere.
c. Tightly cover or close all VOC/OS containers when they are not in use.
d. Prevent excessive air turbulence across exposed VOC/OS.
e. Immediately confine and clean up VOC/OS spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit 1030500-001-AC]

## COMPLIANCE TESTING REQUIREMENTS

**A.6.** VE Compliance Tests - In order to demonstrate compliance with Specific Condition No. A.3., the heat set press thermal oxidizer exhaust stack shall be tested for visible emissions (VE) between 150 and 90 days prior to the expiration date of the operation permit.
[Rule 62-297.310(7)(a)1 & 3, F.A.C.]

**A.7.** Special Compliance Tests - When the Department or PCAQD, 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 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 which 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 and/or the PCAQD.
[Rule 62-297.310(7)(b), F.A.C.]

**A.8.** Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

**A.9.** Compliance Test Method - Required compliance tests shall be performed in accordance with the following reference method.

| Method | Description of Method and Comments |
|---|---|
| 9 | Visual Determination of the Opacity of Emissions from Stationary Sources<br>- *Shall be a minimum of 60 minutes in duration* |

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.
[Rule 62-204.800, F.A.C.; Appendix A of 40 CFR 60]

## NOTIFICATION REQUIREMENTS

**A.10.** Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(*Permitting Note - The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

## RECORDKEEPING AND REPORTING REQUIREMENTS

**A.11.** Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. In addition to, the report shall provide the following information from the test period:

a. Thermal oxidizer temperature as required in Specific Condition No. A.13.
b. Utilization rates and VOC content of the inks and solvents used during the tests, in gallons per hour.
c. The calculated VOC loading rate to the thermal oxidizer, in pounds per hour.

Failure to submit this data or the actual operating conditions may invalidate the test.

[Rules 62-4.070(3) and 62-297.310(8), F.A.C.]

**A.12.** VOC and HAP Records -The permittee shall maintain monthly records for the facility to document compliance with Specific Condition No. A.2. Records shall be completed by the 15th day of the next month. The records shall include, but are not limited to, the following:

a. Facility Name, Emission Unit ID No. (1030500; EU 001) and Description;
b. Month, Year of record;
c. List, by name or identification number, each ink, solvent, coating, thinner, or other VOC/HAP containing material used in association with the printing and manufacturing operations during the month and the usage (amount used minus amount collected for disposal or recycle) of each, in gallons.
d. List the VOC content and HAP content (lbs/gal) for each material listed in c.
e. Calculate the VOC and HAP emissions, using the following general equation:

| Emissions = Usage (gal) x VOC or HAP Content (lbs/gal) |
|---|

f. Calculate the VOC, and total HAP emissions for the most recent month.
g. Calculate the VOC, and total HAP emissions for the most recent consecutive 12-month period.

Records of all calculations and supporting documentation ("As Supplied", "As Applied" sheets, MSDS (or SDS) Sheets, EPA data sheets, purchase orders, etc.) shall be kept for each ink, solvent, coating, thinner, or other VOC/HAP containing material used in association with the printing and manufacturing operations that includes sufficient information to determine VOC and HAP emissions.

At the permittee's option, "purchases" may be used where "usage" is specified. If this option is utilized, no material may be used which is not purchased. The records shall be maintained at the facility for three (3) years and made available to the Department and the PCAQD upon request.

*(Permitting Note: The heat set press thermal oxidizer's destruction efficiency shall not be used in recordkeeping to reduce emissions from the heat set press to show compliance with the emission limits of this permit.)*

[Construction Permit 1030500-001-AC]

**A.13.** Thermal Oxidizer Operation Records - In order to document periods of use of the heat set press thermal oxidizer for information purposes, the permittee shall operate and maintain a device that displays the temperature of the heat set press thermal oxidizer. At least once per day of operation of the heat set web press, the permittee shall record these temperatures. The records shall include the date and time of the measurements and the person responsible for performing the measurements. The records shall also indicate any replacements/additions that occur.
[Rule 62-4.070(3), F.A.C.]

**A.14.** Operation and Maintenance (O & M) Plan for VE and Odor Control - For air pollution control devices and collection systems, the permittee shall maintain and implement an O & M Plan to include a schedule for the maintenance and inspection of each control device, collection systems, and auxiliary equipment. Records of inspections, maintenance, and performance data of control devices and auxiliary equipment shall be retained by the emissions unit for a minimum of two (2) years and shall be made available to the Compliance Authority upon request. The performance parameters shall include operating rates and efficiencies. Such parameters and records shall include, at a minimum, that shown below.

a. Performance Parameters:

i. The operating parameters of the pollution control device.

ii. Time table for the routine maintenance of the pollution control device as specified by the manufacturer.

iii. Time table of routine periodic observations of the pollution control device sufficient to ensure proper operation.

iv. A list of the type and quantity of the required spare parts for the pollution control device which are stored on the premises.

b. Operation and Maintenance Log: A record log which will indicate, at a minimum:

i. When maintenance and observations were performed;

ii. What maintenance and observations were performed;

iii. Who performed said maintenance and observations; and

iv. Acceptable parameter ranges for each operational check.

[Pinellas County Code, Section 58-128; Rule 62-210.650, F.A.C.; Construction Permit 1030500-001-AC]