SWD INTERNAL PERMITTING MEMORANDUM
AND TECHNICAL EVALUATION

TO: Kelley M. Boatwright
District Air Program Administrator

THRU: Nancy Knight
Air Permitting Engineering Specialist III

FROM: Amanda Tucker
Air Permitting Environmental Specialist II

DATE: January 13, 2014

SUBJECT: Draft Air Construction Permit No: 1030509-005-AC
Saint Petersburg Facility

Application Receipt Date: November 22, 2013 *(Time In-House Day 90 is 02/20/2014)*

Document Date: November 22, 2013

This construction permit is to add two small Heatset Lithographic Presses with dryers to Emission Unit 001 and remove the fuel usage cap of three emergency generators (previously permitted EU 002) so that they can operate under the permitting exemption for Stationary Reciprocating Internal Combustion Engines. The annual Visual Emissions test requirement was removed because the thermal oxidizer's efficiency is already recorded by continuous monitoring of its temperature and pressure.

Pinellas County did not comment on the application.

This memo serves as the technical evaluation. The two heatset presses covered by this construction permit were previously permitted in Construction Permit No. 1030509-003-AC. Emission limits in this construction permit have not changed, and the permitted activities do not increase potential or actual emissions over and above what was already permitted.

I emailed Linette Diaz of Cox Target Media, Inc. on December 3, 2013 regarding actual fuel usage of the emergency generators, requested emissions limits for total and individual HAPs, and to schedule a facility inspection. She responded on December 4, 2013 with the fuel usage of the emergency generators from 2012 and 2013 showing they can be considered exempt, and she agreed to keep the combined facility limits the same as those in the existing Operation Permit No. 1030509-004-AO. Additionally we set up an inspection for December 17, 2013.

On December 18, 2013, Linette Diaz followed up with an email about our discussion at the inspection. Cox Target Media, Inc. requested to add a note to the combined facility Hazardous Air Pollutant and Volatile Organic Compounds Emission Limitations that states that this condition will expire when the Largo Facility rescinds its air permit. Accordingly, a HAP limit would be added to Emission Unit 001. They also requested to be able to install a similar heatset press in Phase Two rather than be limited to installing a One Harris Graphics Model 110 Heatset Lithographic press, to allow 90 to 180 days to perform VOC Destruction Efficiency Testing after the presses are in operation, to eliminate the Visual Emission Testing because other testing is already done to monitor the Thermal Oxidizer, and for the permit to expire in 4 years to allow ample time to install the second press. These comments have been incorporated in to the draft permit.

I recommend your approval of the attached draft permit for this project.