

Printing Operations – General Permits

FACILITY: GSP Marketing Technologies, Inc.		Per_ID: 1671	DISTRICT: Southwest
ADDRESS: 5400 140th Avenue North Clearwater, FL			CONTACT: Phone No: 727-532-0647
ARMS No.: 1030463 001	PERMIT NO: 1030463-007-AG	EXPIRATION DATE: 11/8/14	
EMISSION UNIT DESCRIPTION: Screen Printing Operation Consisting of 10 Units (4 AWT, 1 Lawson, 1 Glider, 2 General, and 2 Cylinder Presses and printers); 4 dryers (1 American Fenwal, 1 Cincinnati Super Jet II, 1 American Veco Jet); 10 Ultra Violet Reactors			
INSPECTION DATE: January 19, 2010	ARMS INSPECTION TYPE: <input checked="" type="checkbox"/> INS2 or INS_____	COMPLIANCE STATUS: <input checked="" type="checkbox"/> IN <input type="checkbox"/> MNC <input type="checkbox"/> SNC	
Type of Inspection: <input checked="" type="checkbox"/> Initial <input type="checkbox"/> Re-inspection <input type="checkbox"/> Complaint <input type="checkbox"/> Drive-by <input type="checkbox"/> Quarterly			
A. General Review:			
1.	Permit File Review	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
2.	Introduction and Entry	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Comments: Mr. Gallo was not available. Mr. Bob Foster answered my questions, provided the VOC logs and gave me the tour of the facility.		
3.	Is the Authorized Representative still: <u>John Gallo</u> ?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Comments: NA		
4.	Is the facility contact still: John Gallo?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Comments: Mr. Bob Foster served as the alternate facility contact during this visit.		
I N C	M N C	S N C	B. Specific Conditions
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>A facility comprising one (1) or more printing operations shall be eligible to use this air general permit provided it meets the general eligibility criteria of paragraph 62-210.310(2)(a), F.A.C., and the following specific criteria.</p> <p style="margin-left: 40px;">a. The facility shall use no other air general permit.</p> <p style="margin-left: 40px;">b. The facility shall not be subject to any unit-specific applicable requirement.</p> <p>[62-210.310(4)(f)1]</p> <p>Comments: Mr. Foster stated that GSP does not have another air permit.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>A facility using this air general permit shall comply with the following specific conditions, provided, however, that the facility shall comply with the limitations of either sub-subparagraphs 62-210.310(4)(f)2.a or b., F.A.C. The facility may change method of compliance between sub-subparagraphs 62-210.310(4)(f)2.a. and b., F.A.C., provided the owner or operator maintains records to demonstrate compliance with the appropriate requirement at the time of change and thereafter.</p> <p style="margin-left: 40px;">a. The facility shall not emit eighty (80) tons or more of volatile organic compounds, eight (8) tons or more of any individual hazardous air pollutant, or twenty (20) tons or more of any combination of hazardous air pollutants in any consecutive twelve (12) months. The facility shall not rely upon add-on controls to meet these limitations. The owner or operator shall keep records of material usage and calculate, using a mass balance approach, for each calendar month and each consecutive twelve (12) months, the emissions of volatile organic compounds, individual hazardous air pollutants and total combined hazardous air pollutants. The owner or operator shall retain these records, available for Department inspection, for a period of at least five (5) years; or</p> <p style="margin-left: 40px;">b. The facility shall use less than 1,333 gallons of materials containing any hazardous air pollutants and not exceed the following material usage limitations in any consecutive twelve (12) months. The owner or operator shall keep records of material usage for each calendar month and each consecutive twelve (12) months to demonstrate compliance with such limitations. The owner or operator shall retain these records, available for Department inspection, for a period of at least five (5) years. Specifically, the facility shall:</p> <p style="margin-left: 80px;">(I) Operate only heatset offset lithographic printing lines and use less than 100,000 pounds of ink, cleaning solvent and fountain solution additives combined;</p>

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I N	M N C	S N C	
			<p style="text-align: center;">B. Specific Conditions</p> <p>(II) Operate only non-heatset offset lithographic printing lines and use less than 14,250 gallons of cleaning solvent and fountain solution additives combined;</p> <p>(III) Operate only digital printing lines and use less than 12,100 gallons of solvent based inks, clean-up solutions and other solvent-containing materials combined;</p> <p>(IV) Operate only screen or letterpress printing lines and use less than 14,250 gallons of solvent based inks, clean-up solutions and other solvent-containing materials combined;</p> <p>(V) Operate only water-based or ultraviolet-cured- material flexographic or rotogravure printing lines and use less than 400,000 pounds of water-based inks, coatings and adhesives, combined;</p> <p>(VI) Operate only solvent-based material flexographic or rotogravure printing lines and use less than 100,000 pounds of inks, dilution solvents, coatings, cleaning solutions and adhesives, combined; or</p> <p>(VII) Operate any combination of heatset lithographic, non-heatset lithographic, digital, screen or letterpress, rotogravure or flexographic printing lines and use no more than the most stringent of the material usage limitations contained in sub-sub-paragraphs 62-210.310(4)(f)2.b.(I) through (VI), F.A.C., for the type of printing lines at the facility. For purposes of determining which limit is the most stringent, the pounds of materials used for heatset offset lithographic lines and flexographic lines shall be converted to the equivalent gallons by dividing by 8.5 pounds per gallon and shall be compared with the limits for non-heatset offset lithographic, digital, screen and letterpress lines, as applicable, for the type of printing lines at the facility. The most stringent limit shall apply to the total of all solvent-containing material used. [62-210.310(4)(f)2.]</p> <p><i>Comments: Inspection note: When using mass balance, emission factors may not be used. All VOC and HAP emissions are assumed as emitted.</i></p> <p><i>The records were available back to October 2009, when the facility applied for the GP permit. I examined the electronic records (on their PC) and verified (by following the calculations from one page to another) that the VOCs and HAPS were reported as 100 % as emissions based on material usage and % VOCs/HAPS in each. The end of the month of December was high with a 12 (really 3mos) month running cumulative total of 0.958 tons VOCS and a 12 mos. rolling total cumulative of 0.046 tons HAPS emitted.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The facility shall comply with the objectionable odor prohibition of subsection 62-296.320(2), F.A.C. [62-210.310(4)(f)2.c.]</p> <p><i>Comments: There were no objectionable odors inside or outside of the plant.</i></p>

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			<p style="text-align: center;">C. Selected General Conditions and Procedures</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Administrative Corrections. Within thirty (30) days of any minor changes requiring corrections to information contained in the registration form, the owner or operator shall notify the Department in writing. Such changes shall include:</p> <p>1. Any change in the name, address, or phone number of the facility or authorized representative not associated with a change in ownership or with a physical relocation of the facility or any emissions units or operations comprising the facility; or [62-210.310(2)(d), F.A.C.]</p> <p><i>Comments: There were no changes in name, address, or phone number of the facility or authorized representative, per Mr. Foster.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Equipment Changes. The owner or operator shall maintain records of all equipment changes. In the case of installation of new process or air pollution control equipment, alteration of existing process or control equipment without replacement, or replacement of existing process or control equipment with equipment substantially different in terms of capacity, method of operation, material processed, or intended use than that noted on the most recent registration form, the owner or operator shall submit a new and complete air general permit registration form for the facility with the appropriate fee pursuant to Rule 62-4.050, F.A.C. to the Department, provided, however, that any change that would constitute a new major stationary source, major modification, or modification that would be a major</p>

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			<p>modification but for the provisions of paragraph 62-212.400(2)(a), F.A.C., shall require authorization by air construction permit. [62-210.310(2)(e), F.A.C.]</p> <p><i>Comments: There were no equipment changes per Mr. Foster and none that I could see in my walk through the production area. This facility does not have pollution control device(s).</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>If, for any reason, the owner or operator of any facility operating under an air general permit does not comply with or will be unable to comply with any condition or limitation of the air general permit, the owner or operator shall immediately provide the Department with the following information:</p> <ol style="list-style-type: none"> 1. A description of and cause of noncompliance; and 2. The period of noncompliance, including 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. <p>[62-210.310(3)(i), F.A.C.]</p> <p><i>Comments: Mr. Foster stated that there were no instances of non-compliance.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Valid Permit</p> <p>Use of an air general permit is not transferable and does not follow a change in ownership of the facility. Prior to any sale, other change of ownership, or permanent shutdown of the facility, the owner or operator is encouraged to notify the Department of the pending action. The new owner or operator who intends to continue using the air general permit for the facility shall re-register with the Department pursuant to subparagraph 62-210.310(2)(b)2., F.A.C. [62-210.310(3)(b), F.A.C.]</p> <p><i>Comments: There were no changes of ownership.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Re-registration. Registration of a facility which is currently authorized to operate under the terms and conditions of an air general permit is classified as a re-registration. An owner or operator shall re-register the facility in the following cases:</p> <ol style="list-style-type: none"> a. Impending expiration of the term for air general permit use; b. Change of ownership of all or part of the facility; c. Proposed new construction, modification, or other equipment change that requires registration pursuant to paragraph 62-210.310(2)(e), F.A.C.; and d. Any other change not considered an administrative correction under paragraph 62-210.310(2)(d), F.A.C. <p>62-210.310(2)(b)2.</p> <p><i>Comments: I read and explained the permit condition to Mr. Foster. He stated that he understood what I had conveyed and he said he didn't have any questions.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The owner or operator's use of an air general permit is limited to five (5) years. Prior to the end of the five (5) year term, the owner or operator who intends to continue using the air general permit for the facility shall re-register with the Department pursuant to subparagraph 62-210.310(2)(b)2., F.A.C. To avoid lapse of authority to operate, the owner or operator must submit the proper registration form and processing fee at least thirty (30) days prior to expiration of the facility's existing air general permit. The air general permit re-registration form shall contain all current information regarding the facility. [General Conditions - 62-210.310(3)(a), F.A.C.]</p> <p><i>Comments: The permit expires on 11/8/14. I informed Mr. Foster that a new notification form is required to be submitted no later than 10/9/14.</i></p>
			D. Other:

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Pollution Prevention Activities

➤ P2 Handouts Provided: ☒ P2 Brochure; ☐ P2 Manual; ☐ P2 Checklist

➤ Have any emissions reductions occurred ☐ Yes / ☒ No _____

☐ Chemical Substitution; ☐ Equipment Changes; ☐ Process Changes

☐ Chemical/Material Reuse; ☐ On-site Recycling; ☐ Other: _____

Comments: *There were no changes from the last inspection in terms of VOCs, but Mr. Foster stated that business was starting to pick-up.*

Closing Conference: I informed Mr. Foster that GSP was in compliance with applicable rules and permit conditions ☒ Yes ☐ No

Other Comments: NA

Inspector(s): Jose Rodriguez, Pinellas County, Air Quality Division

Signature(s)

Date: January 19, 2010

CONTACT LOG? _____, **ACCESS?** _____, **GIPCI?** _____

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