PRINTING OPERATIONS

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐
RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 0330281 **DATE:** 1/31/08 **ARRIVE:** 2:10 PM **DEPART:** 2:25 PM

FACILITY NAME: PENSACOLA NEWS JOURNAL

FACILITY LOCATION: 101 EAST ROMANA STREET
PENSACOLA 32502-5652

OWNER/AUTHORIZED REPRESENTATIVE: Patrick T. Daugherty **PHONE:** (435)435-8506

CONTACT NAME: Jack Moorehouse **PHONE:** (850)435-8626

ENTITLEMENT PERIOD: 6/28/2007 (effective date) / 6/28/2012 (end date)

PART I: INSPECTION COMPLIANCE STATUS (check ☑ only one box)

☐ IN COMPLIANCE ☒ MINOR Non-COMPLIANCE ☐ SIGNIFICANT Non-COMPLIANCE

PART II: ELIGIBILITY REQUIREMENTS – Rule 62-210.300, F.A.C.
(check ☑ appropriate box(es))

CATEGORICAL & CONDITIONAL EXEMPTION CRITERIA – Rule 62-210.300 (3) (a) 37., F.A.C.

1. Is the facility subject to any unit-specific applicable requirement?;---------- ☐Yes ☒ No ☐ N/A
2. Does the facility use less than 667 gallons of materials containing any hazardous air pollutants (HAPS) In any consecutive twelve (12) months?;---------- ☒Yes ☐ No

and,

3. Does the facility operate:
   (I) …only **heatset offset lithographic printing** lines and use less than 20,000 pounds combined, of ink, cleaning solvent & fountain solution additives in any consecutive twelve (12) months?;----- ☐Yes ☐ No ☒ N/A
   (II) …only **non-heatset offset lithographic printing** lines and use less than 2,850 gallons, combined, of cleaning solvent and fountain solution additives in any consecutive twelve (12) months?; ☒Yes ☐ No ☐ N/A
   (III) …only **digital printing** lines and use less than 2,425 gallons, combined, of solvent based inks, Clean-up solutions and other solvent-containing materials in any consecutive twelve (12) months?;---------- ☐Yes ☐ No ☒ N/A
   (IV) …only **screen** or **letterpress printing** lines and use less than 2,850 gallons combined of solvent based inks, clean-up solutions and other solvent-containing materials in any consecutive twelve (12) months?;---------- ☐Yes ☐ No ☒ N/A
   (V) …only **water-based or ultraviolet-cured-material flexographic** or **rotogravure printing** lines and use less than 80,000 pounds, combined, of water-based inks, coatings, and adhesives in any consecutive twelve (12) months?; or---------- ☐Yes ☐ No ☒ N/A
   (VI) …only **solvent-based material flexographic** or **rotogravure printing** lines and use less than 20,000 pounds, combined, of inks, dilution solvents, coatings, cleaning solutions, and adhesives in any consecutive twelve (12) months?---------- ☐Yes ☐ No ☒ N/A

PART II: ELIGIBILITY REQUIREMENTS – Rule 62-210.300, F.A.C. *(continued)*
(check ☑ appropriate box(es))

GENERIC EMISSIONS UNIT EXEMPTION CRITERIA – Rule 62-210.300 (3) (b)1., F.A.C.

1. Is the facility subject to any unit-specific applicable requirement?;---------- ☐Yes ☒ No ☐ N/A
2. Does this facility emit or have the potential to emit:
   (i) 500 pounds per year or more of lead and lead compounds expressed as lead?;---------- ☐Yes ☒ No ☐ N/A
   (ii) 1000 pounds per year or more of any hazardous air pollutant?;---------- ☐Yes ☒ No ☐ N/A
   (iii) 2,500 pounds per year or more of total hazardous air pollutants?; **or**---------- ☐Yes ☒ No ☐ N/A
   (iv) 5.0 tons per year or more of any other regulated pollutasnt?---------- ☒Yes ☐ No ☐ N/A

GENERIC FACILITY EXEMPTION CRITERIA – Rule 62-210.300 (3) (b)2., F.A.C.

1. Is the facility subject to any unit-specific applicable requirement?;---------- ☐Yes ☒ No ☐ N/A
2. Does this facility emit or have the potential to emit:
   (i) 1000 pounds per year or more of lead and lead compounds expressed as lead?;---------- ☐Yes ☒ No ☐ N/A
   (ii) 1.0 ton per year or more of any hazardous air pollutant?;---------- ☐Yes ☒ No ☐ N/A
   (iii) 2.5 tons per year or more of total hazardous air pollutants?;---------- ☐Yes ☒ No ☐ N/A
   (iv) 25 tons per year or more of carbon monoxide, nitrogen oxides and sulfur dioxide?; **or**------ ☐Yes ☒ No ☐ N/A
   (v) 10 tons per year or more of any other regulated pollutant?---------- ☒Yes ☐ No ☐ N/A

PART III: AIR GENERAL PERMITS – Rule 62-210.310, F.A.C.

(check ☑ appropriate box(es))

GENERAL PROCEDURES – Determination of Eligibility – Rule 62-210.310(2)(a)1. and **2., F.A.C.**

1. Does this facility emit or have the potential to emit:
   a) ten (10) tons per year or more of any hazardous air pollutant?;---------- ☐Yes ☒ No ☐ N/A
   b) twenty-five (25) tons per year or more of any combination of hazardous air pollutants?; or- ☐Yes ☒ No ☐ N/A
   c) one hundred (100) tons per year or more of any other regulated air pollutant?---------- ☐Yes ☒ No ☐ N/A
2. Has this facility:
   a) been collocated with, or relocated to such a facility as described in question #1. a), b), or c) above?;---------- ☐Yes ☒ No ☐ N/A
   b) created such a facility in combination with any other collocated facilities, emission units, or pollutant-emitting activities, including any such facility, emission unit, or activity that is otherwise exempt from air permitting?---------- ☐Yes ☒ No ☐ N/A
3. Does this facility contain:
   a) any emission units or activities not covered by the applicable air general permit with the exception of units and activities that are exempt from permitting pursuant to subsection Rule 62-210.300(3), F.A.C., or Rule 62-4.040, F.A.C.?;---------- ☐Yes ☒ No ☐ N/A
   b) any emission units or activities authorized by another air general permit where such other air general permit and the air general permit of interest specifically allow the use of one another at the same facility?---------- ☐Yes ☒ No ☐ N/A

GENERAL PROCEDURES – Initial Registration/Re-registration – Rule 62-210.310(2)(b), F.A.C.

1. Has the owner or operator of this facility completed and submitted the proper registration form to the Department for the specific air general permit to be used?;---------- ☒Yes ☐ No ☐ N/A
2. Does this facility have a current valid air general permit (entitlement to operate)?;---------- ☒Yes ☐ No ☐ N/A
3. Has there been a change of ownership of all or part of the facility?;---------- ☐Yes ☒ No ☐ N/A
4. Have there been any new administrative, construction, modification, or equipment changes that require a re-registration?---------- ☐Yes ☒ No ☐ N/A

PART III: AIR GENERAL PERMITS – Rule 62-210.310, F.A.C. *(continued)*

(check ☑ appropriate box(es))

GENERAL CONDITIONS – Rule 62-210.310(3), F.A.C.

1. Does the air general permit registration form contain all current information regarding the facility?;---------- ☐Yes ☒ No ☐ N/A
2. Has the owner or operator allowed the circumvention of any air pollution control device, or allowed the emission of air pollutants without the proper operation of all applicable air pollution control devices?;---------- ☐Yes ☒ No ☐ N/A
3. Does the owner or operator:
   a) maintain the authorized facility in good condition?;---------- ☒Yes ☐ No ☐ N/A
   b) ensure that the facility maintains its eligibility to use the air general permit and complies with all

terms and conditions of the air general permit?;---------- ☐Yes ☒ No ☐ N/A

4. Has the owner or operator allowed you, as the duly authorized representative of the Department, access to the facility at reasonable times to inspect and test and to determine compliance with the air general permit and Department rules?---------- ☒Yes ☐ No ☐ N/A

PART IV: SPECIFIC CONTROL/OPERATING/RECORDKEEPING CRITERIA – Rule 62-210.310(4)(f), F.A.C.
(check ☑ appropriate box(es))

SPECIFIC CONDITIONAL EXEMPTION REQUIREMENTS FROM TITLE V AIR PERMITTING

1. Does the facility have any other air general permits?;---------- ☐Yes ☒ No ☐ N/A
2. Is this printing operation subject to any unit-specific applicable requirement?;---------- ☐Yes ☒ No ☐ N/A

[*Answer questions 3. a), b), & c), and 4. below if the facility uses the **mass balance approach** to calculate emissions. If the **materials usage limitation approach** is used, skip questions 3. and 4. below and proceed to question 5.*]

Mass Balance Approach

3. Does the facility emit:
   a) …eighty (80) tons or more of VOC's?;---------- ☐Yes ☐ No ☐ N/A
   b) …eight (8) tons or more of any individual HAP?;---------- ☐Yes ☐ No ☐ N/A
   c) …or twenty (20) tons or more of any combination of HAP's in any consecutive twelve (12) months?;---------- ☐Yes ☐ No ☐ N/A
4. Does the facility rely upon add-on controls to meet any of the above limitations in a), b), or c)?; ☐Yes ☐ No ☐ N/A

Materials Usage Limitation Approach

5. In any consecutive twelve (12) months, does the facility use less than:
   a) …thirteen hundred and thirty-three (1,333) gallons of materials containing hazardous air pollutants (HAP's)?;---------- ☐Yes ☐ No ☐ N/A

and *(choose only one category below,* I *thru* VI, *or* VII*).*

I. …Operate only **heatset offset lithographic printing** lines and use less than 100,000 pounds of ink, cleaning solvent, and fountain solution additives combined?;---------- ☐Yes ☐ No ☐ N/A

II. …Operate only **non-heatset offset lithographic printing** lines and use less than 14,250 gallons of cleaning solvent and fountain solution additives combined?;---------- ☒Yes ☐ No ☐ N/A

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?;---------- ☐Yes ☐ No ☐ N/A

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?;---------- ☐Yes ☐ No ☐ N/A

PART IV: SPECIFIC CONTROL/OPERATING/RECORDKEEPING CRITERIA – Rule 62-210.310(4)(f), F.A.C.
(check ☑ appropriate box(es))

SPECIFIC CONDITIONAL EXEMPTION REQUIREMENTS FROM TITLE V AIR PERMITTING *(continued)*

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?; ☐Yes ☐ No ☒ N/A

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?;---------- ☐Yes ☐ No ☒ N/A

or;

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-subparagraphs 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?;---------- ☐Yes ☐ No ☐ N/A

(Refer to the chart & information below to identify the Printing Process combination(s) and to determine the most stringent limit for the combination(s) chosen.)

	PRINTING PROCESS	INDIVIDUAL PROCESS LIMITS (IPL)	STRINGENT LIMITS FOR COMBINATIONS (SLC) (SLC = IPL* ÷ 8.5 lbs/gal.**)
#1	Heatset Offset Lithographic	100,000 lbs.*	11,765 gals.**
#2	Non-heatset Offset Lithographic	14,250 gals.	14,250 gals
#3	Digital	12,100 gals.	12,100 gals.
#4	Screen or Letterpress	14,250 gals.	14,250 gals
#5	Water-based or UV cured Rotogravure or Flexographic	400,000 lbs.*	47,059 gals.**
#6	Solvent-based Rotogravure or Flexographic	100,000 lbs*	11,765 gals**

(Example: If you were a printer and your combination printing processes included both **Printing Process** *numbers* **two (2)** *and* **five (5)**, *then the most stringent limit shall apply to the total of all solvent-containing material used. In this example, the individual* **Stringent Limit for Combinations (SLC)** *for each process is* **14,250 gals.** *and* **47,059 gals.,** *respectively. Therefore, the most stringent limit for this combination would be* **14, 250 gals.***)*

6. Does the facility 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.)---------- ☐Yes ☒ No ☐ N/A

Carol Melton
Inspector's Name (Please Print)

1/31/08
Date of Inspection

/s/
Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: After I explained the requirement to conduct an annual air permit inspection of the press operations, Travis Motley, the Building Manager, introduced Jack Moorehouse, the Press Supervisor. Both indicated that they were not aware of an air general permit for the facility, and were not aware of records kept to track the amount of inks used. They indicated that the Press Manager Dave Alcock was on vacation and would be back on February 1, 2008. I asked if Richard Ottensmeyer was available and they indicated he no longer worked for Gannett. They explained that Patrick Daugherty was the new Director, and did not know if he was available. They suggested I wait until I hear from Mr. Alcock. I showed them a copy of the general permit and explained the requirement to track ink usage to determine the amount of volatile organic compounds emitted. Mr. Moorehouse indicated he understood and that he would inform Mr. Alcock of the permit and requirement to track ink usage. I gave them my business card with my contact information. Mr. Moorehouse indicated they would email or fax the ink usage information to me.