Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION – AIR QUALITY
One North University Drive, Suite 203, Plantation, Florida 33324
954-519-1260 • FAX 954-519-1495

NOTICE OF FINAL AIR PERMIT

Sent by Certified Mail – Return Receipt Requested

Mr. Domenic Pizzanelli, V.P. Engineering & Facility Management
Earth Thebault
249 Pomeroy Road
Parsippany, NJ 07054

Air Permit No. 0112363-010-AC
Media Printing Corporation
Lithographic Printing Facility

Dear Mr. Pizzanelli:

Enclosed is the final air construction permit, which authorizes installation of two heatset web lithographic printing presses, two dryers and two inline regenerative thermal oxidizers. In addition, this permit authorizes the removal of emissions unit #1, which consists of a Baker Perkins Model G25 printing press, one dryer and one afterburner. The proposed work will be conducted at the Media Printing Corporation, which is located in Broward County at 4300 Powerline Road, Pompano Beach, Florida. This final permit is issued pursuant to Chapter 403, Florida Statutes.

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 Pollution Prevention, Remediation and Air Quality Division (PPRAQ), One North University Drive, Suite: 203, Plantation, Florida 33324 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 PPRAQ.

Executed in Plantation, Florida.

Daniela Banu

Daniela Banu, Air Quality Administrator
Pollution Prevention, Remediation and Air Quality Division

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Air Permit package (including the Final Permit) was sent by electronic mail or regular mail with received receipt requested before the close of business on 8/17/10 to the persons listed below.

Xue Feng, Ph.D, Compliance Management International, Inc., (xfeng@complianceplace.com)

Lennon Anderson, P.E., SFDEP, Air Section, (Lennon.anderson@dep.state.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) 8/17/10 (Date)

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POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION – AIR QUALITY
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PERMITTEE:
Mr. Domenic Pizzanelli
V.P. of Engineering & Facility Management
Earth Thebault
249 Pomeroy Road
Parsippany, NJ 07054

AIRS ID NO: 0112363
Permit Number: 0112363-010-AC
Issue Date: August 17, 2010
Expiration Date: April 15, 2011

Project: Construction permit to install two heatset web lithographic printing presses with integrated dryer regenerative thermal oxidizer and to remove emissions unit #1, which consists of a Baker Perkins Model G25 printing press, one dryer and one afterburner. This permit consolidates all emission units into one single permit.

Lat/Long: 26°16'57"N/ 80°09'06"W

UTM: Zone 17; 583.86 Km. E; 2907.08Km. N

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) Florida Administrative Code (F.A.C.) Rules 62-4 and 62-204 through 62-297 (permitting requirements) and Broward County Code, Chapter 27 (emission limitations) and in conformance with all existing regulations of the Florida Department of Environmental Protection (DEP). The above named Permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Pollution Prevention, Remediation and Air Quality Division (PPRAQ) and made a part hereof and specifically described as follows:

Construct: An air pollution source consisting of a commercial printing facility with a sheetfed and heat set web offset lithographic printing process, which includes the printing presses, dryers, and two regenerative thermal oxidizers and one catalytic oxidizer. The facility emits hazardous air pollutants (HAP) and volatile organic compounds (VOC). The HAPs emitted from this facility are from blanket wash and fountain solution. There is also a waste paper extraction system (paper shredder), which is an unregulated emission point.

EU#2: Hantscho Mark - Beiren Printing Press with Web Tech 80 Hot Air Offset Dryer with natural gas consumption of 3.68 mmBTU/hr and a Tech HXC 6000 catalytic oxidizer to control VOC destruction. The setpoint temperature for the catalytic oxidizer inlet will be maintained at or greater than 700 ^{0}F.

EU#3: Harris M110 Printing Press with Web Tech 80 Hot Air Offset Dryer natural gas consumption of 3.31 mmBTU/hr. The catalytic oxidizer that controls air emissions of EU#2 will also control air emissions at EU#3.

EU#4: Heidelberg 102 Speed Master sheetfed non-heatset lithographic printing press. There is no pollution control device associated with this press.

EU#5: One Heidelberg M600 heatset web lithographic printing press, dryer, with two inline regenerative thermal oxidizers(RTO). The maximum rated gross heat input is 3.04 MMBTU/hr. One Harris M1000 Heatset web lithographic printing press, dryer, with inline RTO. The maximum rated gross heat input is 2.29 MMBTU/hr.

In accordance with: Application for permit to construct received December 1, 1997, additional information received on March 11, 1998 and August 3, 1998, Public Notice of Intent to Issue Permit issued on August 14, 1998 and published on August 22, 1998 in the Sun-Sentinel newspaper and application to obtain an operation permit received on September 28, 1999, renewal application received August 12, 2004 and additional information received March 2005, construction permit application to add emissions unit #4 received January 30, 2007, additional information received March 28, 2007, Public Notice of Intent to Issue Permit issued April 12, 2007 and published July 23, 2007 in the Sun-Sentinel newspaper, application to obtain operation permit received January 17, 2008 and application to obtain construction permit received July 28, 2009 and additional information received September 10, 2009, application for permit to construct received April 19, 2010, additional information received June 1,2010, Notice of Intent to Issue Permit issued July 6, 2010, and published in the Sun-Sentinel newspaper (none are attached).

Location: 4300 Powerline Road, Pompano Beach, Broward County, Florida.

To serve: Commercial Printing, lithographic Facility (SIC #: 2752)

Subject to: General Conditions 1-16, Facility-Wide Conditions 17 - 22 and Specific Conditions 23-35.

General Conditions

1. Terms of Permit. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The Permittee is placed on notice that the PPRAQ will review this permit periodically and may initiate enforcement action for any violation of these conditions.
[Rules 62-4.160 (1), F.A.C.]

2. Permit Validity. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the PPRAQ.
[Rules 62-4.160 (2), F.A.C.]

3. Disclaimer. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, or any violations of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other permit that may be required for other aspects of the total project which are not addressed in this permit.
[Rules 62-4.160 (3), F.A.C.]

4. Disclaimer. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interest have been obtained form the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
[Rules 62-4.160 (4), F.A.C.]

5. Liability. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and DEP rule, unless specifically authorized by an order from the PPRAQ.
[Rules 62-4.160 (5), F.A.C.]

6. Operation and Maintenance. The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by county and state rules. This provision included the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and PPRAQ and DEP rules.
[Rules 62-4.160 (6), F.A.C.]

7. Onsite Inspection Activities. The Permittee, by accepting this permit, specifically agrees to allow authorized PPRAQ personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times (depending on the nature of the concern being investigated), access to the premises where the permitted activity is located or conducted to:

   (a) Have access to and copy any records that must be kept under conditions of the permit;
   (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
   (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or PPRAQ and DEP rules.

   [Rules 62-4.160 (7), F.A.C.]

8. Notice of Noncompliance. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide PPRAQ with the following information:
   (a) A description of and cause of noncompliance; and
   (b) 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 educe, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any enforcement action by PPRAQ for penalties or for revocation of this permit.

   [Rules 62-4.160 (8), F.A.C.]

9. Reporting Noncompliance. The Permittee shall report any periods of noncompliance to the PPRAQ immediately by phone at 954-519-1499 or by Email at EPDHOTLINE@broward.org. This also applies when the period of noncompliance is first determined after normal business hours or on weekends and holidays.
   [Rules 62-4.130 and 62-4.070(3), F.A.C.]

10. Evidence Materials. By accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted facility or activity, that are submitted to the PPRAQ may be used by the PPRAQ as evidence in any enforcement proceeding arising under the Florida Statues or F.A.C. rules, except where such use is prohibited by Section 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
    [Rules 62-4.160 (9), F.A.C.]

11. Rule Changes. The Permittee agrees to comply with changes in Florida DEP and Florida Statutes after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or DEP rules.
    [Rules 62-4.160 (10), F.A.C.]

12. Permit Transfer. This permit is transferable only upon PPRAQ approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The Permittee shall be liable for any non-compliance of the permitted activity until the transfer approved by the PPRAQ.
    [Rules 62-4.160 (11), F.A.C.]

13. Work Site Copy. This permit or a copy thereof shall be kept at the work site of the permitted activity.
    [Rules 62-4.160 (12), F.A.C.]

14. Miscellaneous Compliance Requirements. The Permittee shall comply with the following:

    (a) Upon request, the Permittee shall furnish all records and plans required under DEP rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the PPRAQ.

    (b) The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recording for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by PPRAQ rule.

    (c) Records of monitoring information shall include:

1. The date, exact place, and time of sampling or measurements;
2. The person responsible for performing the sampling or measurements;
3. The dates analyses were performed.
4. The person responsible for performing the analyses;
5. The analytical techniques or methods used;
6. The results of such analyses.

[Rules 62-4.160 (14), F.A.C.]

15. Information Submittal. When requested by the PPRAQ, the Permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the PPRAQ, such facts or information shall be corrected promptly.
[Rules 62-4.160 (15), F.A.C.]

16. Rules Adoption. Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, as amended, are adopted by Broward County Code, Sec. 27-173.
[Broward County Code, Sec. 27-173]

Facility-wide Conditions

17. Objectionable Odor. No person shall 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.]

18. General Visible Emissions Standard. Unless otherwise specified by permit or rule, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than 20 percent opacity.
[Rule 62-296.320(4) (b), F.A.C., and *DEP Guidance, March 2000, DARM-PER 33]*

19. Volatile Organic Compounds Emissions or Organic Solvent Emissions. No person shall store, pump, handle, process, load, unload or use in any process or installation volatile organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the PPRAQ.
[Broward County Code, Sec. 27-175(f)]

20. Concealment. No person shall build, erect, install, or use any article, machine, equipment or other contrivance, the use of which will conceal any emission which would otherwise constitute a violation of any provisions of Broward County Code.
[Broward County Code, Sec. 27-175(b)]

21. Circumvention. No person shall circumvent any air pollution device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Broward County Code, Sec. 27-175(c)]

22. Maintenance. No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Code.
[Broward County Code, Sec. 27-175(d)]

Specific Conditions

Emission Limiting Standards

23. The permittee shall comply with the following VOC and HAP emissions limitations and product usage rate limitations to attain synthetic minor status under the Title V Air Operating Permits Program:

    a) Total facility-wide emissions of VOC shall not exceed 95.0 tons in any consecutive 12 month period.
    b) Total facility-wide emissions of any individual HAP shall not exceed 9.5 tons per any consecutive 12 month period.
    c) Total facility-wide emissions of total HAP shall not exceed 23.75 tons in any consecutive 12 month period.
    d) Total ink usage shall not exceed 1,055,200 pounds in presses at EU# #2, #3 and #4 combined; and 693,466 pounds in presses at EU#5, in any consecutive 12 month period.
    e) Total blanket wash usage shall not exceed 9,200 gallons in presses at EU #2, #3 and #4 combined; and 5,466 gallons in presses at EU#5, in any consecutive 12 month period.
    f) Total fountain solution usage shall not exceed 10,000 gallons, in presses at EU #2, #3 and #4 combined; and 5,666 gallons in presses at EU#5, in any consecutive 12 month period.

    [Rule 62-4.070(3), F.A.C., construction application received December 1, 1997, and renewal application received August 12, 2004, permit modification dated August 18, 2005, construction applications dated January 30, 2007 and July 28, 2009, respectively, construction application received April 19, 2010]

24. The permittee shall allow no visible emissions (5 percent opacity) from the catalytic oxidizers associated with EU #2, EU#3 and EU#5 except that visible emissions not exceeding 20 percent opacity are allowed for up to three minutes in any one hour period.
    [Rule 62-296.401(1) (a), F.A.C.]

25. The fuel used in the catalytic oxidizer and regenerative thermal oxidizers and dryers shall be limited to natural gas.
    [Rule 62-4.070(3), F.A.C. and construction application received December 1, 1997 and April 19, 2010]

Compliance and Testing Requirements

26. Visible Emissions Test Required. During each fiscal year (October 1- September 30) unless otherwise specified by rule, order, or permit, the owner or operator of each emission unit shall have a formal compliance test conducted to verify compliance with the applicable emission limiting standards.
    Compliance testing shall be conducted in accordance with the methods specified below:

Source/ Emission Point	Pollutant	Test Method	Frequency
Outlet on two regenerative thermal oxidizers and one catalytic oxidizer	VE	EPA Method 9	Every fiscal year

    [Rule 62-297.310(7) (a) 4.a, F.A.C.]

27. Opacity Observations. Opacity observations shall be made and recorded by a certified visible emissions observer and observations shall be taken at sequential fifteen second intervals during the required period of the observation.
    [Rule 62-297.401(9) (c) 1, F.A.C.]

28. Special Compliance Test. When the PPRAQ, after investigation, has good reason to believe (such as complaints, increased visible emissions or questionable maintenance of control equipment) that any applicable emission standard in F.A.C. Rules 62-204 through 62-297 or in a permit issued pursuant to those rules is being violated, it shall 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 PPRAQ.
[62-297.310(7) (b), F.A.C.]

29. Operating During Testing. Testing of emissions should be conducted using fuel and/or process input expected to result in the highest emissions and at 90-100% of the permitted capacity of the source. If the source is not tested at 90-100% of permit capacity, the source may not be operated above 110% of the load during testing until a new test showing compliance is conducted.
[Rule 62-297.310(2), F.A.C.]

Recordkeeping, monitoring and reporting requirements

30. In order to demonstrate compliance with Specific Condition #23, VOC and HAP emissions will be calculated on a consecutive twelve-month period, product usage rates will be totaled and summaries of emissions will be maintained at the facility along with supporting records within thirty (30) days of the end of each calendar month. All records demonstrating compliance with this permit shall be readily verifiable by inspectors. The records shall be kept for five years.
[Rule 62-4.070(3), F.A.C.]

31. Annual Operation Report (AOR). The AOR shall be submitted to the PPRAQ by April 1 of the following year. If the report is submitted to FDEP using FDEP's electronic annual operation report software (EAOR), there is no requirement to submit a copy to PPRAQ.
[Rule 62-210.370(3), F.A.C.]
{Permitting Note. Information on the EAOR submittal is available at
http://www.dep.state.fl.us/air/eproducts/eaor/default.htm}

32. Test Reports Submittal. Copies of all reports, tests, notifications or other submittals required by this permit shall be submitted to the PPRAQ, as soon as practical but no later than forty-five (45) days after the last test completed.
[Rule 62-297.310(8) (b), F.A.C.]

33. A monitor and a chart recorder shall monitor and record the temperature, respectively, at the RTO and catalytic oxidizer while the units are in operation. The temperature of RTO shall be at least 1,500 degrees Fahrenheit and 1,400 degrees Fahrenheit, and the setpoint temperature for the catalytic oxidizer inlet shall be equal or greater than to 700 degrees Fahrenheit, as recommended by the manufacturer.
[Rule 62-4.070(3), F.A.C., renewal application received August 12, 2004 and additional information received March 7, 2005]

Notification Requirements

34. The owner or operator shall notify PPRAQ at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
[Rule 62-297.310(7) (a) 9, F.A.C.]

Operating Permit Requirements

35. By this construction permit, the owner or operator is allowed to construct, operate, and conduct tests, if required, to determine compliance with the provisions of the permit, and to apply for and receive an operation permit prior to the permit's expiration date. To properly apply for an operation permit the applicant shall submit the appropriate fee and certification that construction was completed noting any deviations from the conditions in the construction permit and test results where appropriate.
[F.A.C. Rule 62-4.210(3) and 62-4.220]

{Permitting Note: The Permittee may also elect to submit the application electronically using the Electronic Permit Submittal and Processing system (EPSAP) via the http://www.dep.state.fl.us/air/software.htm website, along with the processing fee established in Rule 62-4.050(4), F.A.C. , [62-4.090(1) and 62-4.050(4), F.A.C.]

Executed in Broward County, Florida
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION

Daniela Banu

Daniela Banu, Air Quality Administrator