BROWARD COUNTY
FLORIDA
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 PERMIT

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

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

Dear Mr. Pizzanelli:

Enclosed is operation permit number 0112363-011-AF to operate an air pollution source issued pursuant to Section 403.087 of the Florida Statutes, Broward County's Specific Operating Agreement with the Florida Department of Environmental Protection, and Broward County Code Chapter 27 Article IV which adopts Florida Administrative Code (FAC) 62-4, 62-296 and 62-297.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 62-103 and 28-5.201, FAC, and must be filed (received) in the in the Office of the Broward County Attorney at 115 South Andrews Avenue, Suite 423, Fort Lauderdale, Florida 33301-1872 within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes and Chapter 27. This permit is final and effective on the date filed with the Clerk of the PPRAQD unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, FAC. Upon timely filing of a petition or a request for an extension of time, this permit will not be effective until further Order of the PPRAQD. When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, in the Office of the Broward County Attorney at 115 South Andrews Avenue, Suite 423, Fort Lauderdale, Florida 33301-1872 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 of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

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

Daniela Banu

Daniela Banu, Air Quality Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this written Notice of Final Permit(including the Final Permit and the Final Determination) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) or certified mail with receipt requested before the close of business on June 20, 2011 to the persons listed below.

Lennon Anderson, P.E., SFDEP, Air Section, Lennon.Anderson@dep.state.fl.us

Donald McCulla, Compliance Management International, dmcculla@complianceplace.com

Domenic Pizzanelli, Earth Thebault, via certified mail

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) 6/20/2011 (Date)

BROWARD COUNTY
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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 AIR POLLUTION PERMIT

ISSUED TO:

PERMITTEE:
Media Printing Corporation
Authorized Representative:
Mr. Domenic Pizzanelli, V. P. of Engineering & Facility Management
Earth Thebault
249 Pomeroy Road
Parsippany, NJ 07054

AIRS ID NO: 0112363
Permit Number: 0112363-011-AF
Issue Date: June 20, 2011
Expiration Date: March 30, 2016

Facility Name: Media Printing Corporation located at 4300 Powerline Road, Pompano Beach, Broward County, Florida.

Project Description: Federally Enforceable State Operation Permit (FESOP) issued to revise the usage rate limitations of inks, blanket wash and fountain solution and keeping the synthetic minor status. This permit also supersedes previous permits. SIC Code: 2752.

Lat/Long: 26°516'57" N / 80°09'06" **UTM:** Zone 17; 583.86 Km. E; 2907.08 Km. N

Statement of Basis: This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) Florida Administrative Code (F.A.C.) Rules 62-4 and 62-210 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 (FDEP). 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 Broward County Pollution Prevention, Remediation and Air Quality Division (PPRAQD) and made a part hereof.

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, federally enforceable state operation permit application received March 24, 2011, Notice of Intent to Issue Permit issued May 3, 2011, published in the Sun-Sentinel newspaper June 3, 2011; and Proof of Publication received June 9, 2011 (none are attached).

This permit is organized by the following sections.
1. Facility Description
2. General Conditions
3. Facility-wide Conditions
4. Emissions Unit Specific Conditions

Executed in Broward County, Florida

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

1. FACILITY DESCRIPTION

Media Printing Corporation is a lithographic printing facility in which the printing and nonprinting areas are essentially in the same plane on the surface of a thin metal called the lithographic plate. In the offset lithographic printing the ink is transferred from the lithographic plate to a rubber-covered (blanket) cylinder and then to the substrate. Transfer of the ink from the lithographic plate to the blanket cylinder, rather than directly to the substrate, is the offset characteristic of the lithographic printing. They print catalogs, magazines, business newsletters, etc. Currently, there are three heatset web offset lithographic printing presses; two are equipped with a dryer and a catalytic oxidizer to control air emissions; and one with a dryer and an afterburner. There is a non-heatset sheetfed lithographic printing press which does not have a pollution control device. The present operation permit contains VOC and HAP emission limitations below the major source (TitleV) thresholds along with recordkeeping and reporting requirements, which keeps the operation as a synthetic minor source. These emission limitations are federally enforceable. The three heatset web offset printing presses are also subject to F.A.C. 62-296.401(1) - 5% opacity emission limitations and an annual visible emissions test. In addition, there is usage rate limitations for the inks, fountain solution and blanket wash. There is also a non-heat set lithographic printing press.

The facility consists of the following emissions units:

E.U. ID No.	Brief Description
002	Hantscho Mark - Beiren Printing Press with Web Tech 80 Hot Air Offset Dryer maximum gross heat input rating of 3.68 mmBTU/hr and a Tech HXC 6000 catalytic oxidizer to control VOC emissions. The setpoint temperature for the catalytic oxidizer inlet will be maintained at or greater than 700 ^{0}F.
003	Harris M110 Printing Press with Web Tech 80 Hot Air Offset Dryer with maximum gross heat input rating of 3.31 mmBTU/hr. The catalytic oxidizer that controls air emissions of EU#2 will also control air emissions at EU#3.
004	Heidelberg 102 Speed Master sheetfed non-heatset lithographic printing press. There is no pollution control device associated with this press.
005	One Heidelberg M600 heatset web lithographic printing press, dryer, with one inline regenerative thermal oxidizers (RTO). The maximum rated gross heat input is 3.04 MMBTU/hr.

2. 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 PPRAQD will review this permit periodically and may initiate enforcement action for any violation of these conditions.
[Rule 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 PPRAQD.
[Rule 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.
[Rule 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 from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
[Rule 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 FDEP rule, unless specifically authorized by an order from the PPRAQD.
[Rule 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 when required by PPRAQD and FDEP rules.
[Rule 62-4.160 (6), F.A.C.]

7. Onsite Inspection Activities. The Permittee, by accepting this permit, specifically agrees to allow authorized PPRAQD 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 PPRAQD and FDEP rules.
[Rule 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 PPRAQD 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 reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any enforcement action by PPRAQD for penalties or for revocation of this permit.
   [Rule 62-4.160 (8), F.A.C.]

9. Reporting Noncompliance. The Permittee shall report any periods of noncompliance to the PPRAQD immediately by phone at 954-519-1499 or by Email at EPDHOTLINE@broward.org. This also applies when the period of non-compliance 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 PPRAQD, may be used by the PPRAQD 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.
    [Rule 62-4.160 (9), F.A.C.]

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

12. Permit Transfer. This permit is transferable only upon PPRAQD 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 PPRAQD.
    [Rule 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.
    [Rule 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 FDEP rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the PPRAQD.
    (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 PPRAQD 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.

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

15. Information Submittal. When requested by the PPRAQD, 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 PPRAQD, such facts or information shall be corrected promptly.
[Rule 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]

3. 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. Volatile Organic Compound Emissions or Organic Solvent Emissions. No person shall store, pump, handle, process, load, unload or use in any process or installation volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the PPRAQD.
[Rule 62-296.320(1), F.A.C., Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(f)]

19. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere any air pollutants from sources, the opacity of which is equal to or greater than 20 percent. If the presence of uncombined water is the only reason for failure to meet visible emission standards given in this section, such failure shall not be a violation of this prohibition.
[Rule 62-296.320(4) (b), F.A.C. and Broward County Code, Section 27-175(i). DEP Guidance, March 2000, DARM-PER 33]

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 Codes.
[Rule 62-4.070(3), F.A.C. and 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.
[Rule 62-210.650 F.A.C and 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 Codes.

23. Special Compliance Tests. When PPRAQD, 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 PPRAQD rule 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 PPRAQD.
[Rule 62-297.310(7) (b), F.A.C.]

24. Annual Operation Report (AOR). The AOR shall be submitted to the PPRAQD by April 1 of the following year. If the permittee elects to use FDEP's electronic annual operation report software (EAOR), the report must be submitted directly to FDEP and there is no requirement to submit a copy to PPRAQD.
[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}

25. Operating Permit Renewal. Sixty days before the expiration date of this operation permit, the permittee shall apply for a renewal of permit using the forms incorporated by reference in the specific rule chapter for this type of permit.
[Rule 62-4.090 F.A.C.]
{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.

4. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Description of Emissions Unit
002	Hantscho Mark - Beiren Printing Press with Web Tech 80 Hot Air Offset Dryer maximum gross heat input rating of 3.68 mmBTU/hr and a Tech HXC 6000 catalytic oxidizer to control VOC emissions. The setpoint temperature for the catalytic oxidizer inlet will be maintained at or greater than 700 ^{0}F.
003	Harris M110 Printing Press with Web Tech 80 Hot Air Offset Dryer with maximum gross heat input rating of 3.31 mmBTU/hr. The catalytic oxidizer that controls air emissions of EU#2 will also control air emissions at EU#3.
004	Heidelberg 102 Speed Master sheetfed non-heatset lithographic printing press. There is no pollution control device associated with this press. A reinforced plastic molding fiberglass application and resin lay out operation with 80% closed molding and 20% open molding. There are four spray booths which exhaust to the atmosphere. There is one exhaust stack per spray booth. In addition, there are two grinding booths which do not exhaust to the atmosphere that are considered exempt emissions units.
005	One Heidelberg M600 heatset web lithographic printing press, dryer, with one inline regenerative thermal oxidizers (RTO). The maximum rated gross heat input is 3.04 MMBTU/hr.

Emission Limiting Standards

26. 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 1,316,000 pounds in presses at EU# #2, #3, #4 and #5 combined in any consecutive 12 month period.
e) Total blanket wash usage shall not exceed 11,250 gallons in presses at EU #2, #3, #4 and #5combined, in any consecutive 12 month period.
f) Total fountain solution usage shall not exceed 12,125 gallons, in presses at EU #2, #3, #4 and #5 combined 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, FESOP application received March 24, 2011]

27. The permittee shall allow no visible emissions (5 percent opacity) from the catalytic oxidizer associated with EU #2, EU#3; and the RTO associated with 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.]

28. 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 Testing Requirements

29. 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 regenerative thermal oxidizer and catalytic oxidizer	VE	EPA Method 9	Every fiscal year

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

30. 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.]

31. Operating During Testing. Testing of emissions shall 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.]

Notifications, Recordkeeping and Reporting Requirements

32. In order to demonstrate compliance with Specific Condition #26, 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.]

33. Test Reports Submittal. Copies of all reports, tests, notifications or other submittals required by this permit shall be submitted to the PPRAQD, 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.]

34. A monitor and a chart recorder shall monitor and record the temperature, respectively, at the regenerative thermal oxidizer (RTO) and catalytic oxidizer while the units are in operation. The operating temperature of RTO shall be at least 1,500 degrees Fahrenheit, and the set point 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]

35. The owner or operator shall notify PPRAQD 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.]