



Environmental Protection and Growth Management Department
ENVIRONMENTAL ENGINEERING AND PERMITTING DIVISION
1 North University Drive, Mailbox 201, Plantation, Florida 33324
954-519-1483 • FAX 954-519-1495

PERMITTEE

Wilco Press, LC
3333 S.W. 15th Street
Deerfield Beach, Florida 33442

Air Permit No. 0112369-009-AF
Air Operation Permit
Broward County, Florida

Authorized Representative:
Mr. Daniel Morlini, Production Manager

PROJECT

This final air operation permit authorizes Wilco Press, LC to operate a publishing printing press facility that consists of general and miscellaneous publishing and printing products, including general advertisements, mail-outs, flyers, brochures, pamphlets, etc. This project renews operation permit 0112369-008-AF, with no changes identified or requested. The Standard Industrial Classification No. is 2741 and the North American Standard Classification System No. is 511199. The facility is located in Broward County at 3333 S.W. 15th Street, Deerfield Beach, Florida. The geographic coordinates are Latitude: 26° 17' 46" North and Longitude: 80° 09' 07" West. This final permit is organized into five sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Facility Wide Conditions); Section 4 (Emissions Unit Specific Conditions); and Section 5 (Appendices). The acronyms and abbreviations are defined in Appendix A of Section 5 of this permit.

Permitting Authority: Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Environmental Engineering and Permitting Division (EPPD). EPPD's physical address is: 1 North University Drive, Mailbox 201, Plantation, Florida 33324. EPPD's telephone number is 954-519-1483.

Petitions. A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of the Broward County Attorney at 115 S. Andrews Avenue, Room 423, Fort Lauderdale, Florida 33301-1872 (Telephone: 954-357-7600, Fax: 954-357-7641). Petitions by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the EPPD's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number

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of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed act; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Office of the Broward County Attorney at 115 S. Andrews Avenue, Room: 423, Fort Lauderdale, Florida 33301-1872 (Telephone: 954/357-7600, Fax: 954/357-7641, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate EEPD.

0112369-009-AF Effective Date: December 6, 2017

Renewal Application Due Date: October 5, 2017

Expiration Date: December 5, 2022

Executed in Plantation, Florida

Robert C. Wong
Environmental Program Supervisor
ENVIRONMENTAL ENGINEERING AND PERMITTING
DIVISION

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CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Ms. Diane Pupa, Permitting Program Administrator, Florida Department of Environmental Protection /Southeast District, diane.pupa@dep.state.fl.us
Mr. Daniel Morlini, Wilen Press, LC, dmorlini@wilengroup.com
Mr. Peter Bryk, Wilen Press, LC, pbryk@wilengroup.com

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

Date

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

Wilco Press is a publishing printing press facility that consists of general and miscellaneous publishing and printing products, including general advertisements, mail-outs, flyers, brochures, pamphlets, etc. There is One (1) Harris Model No. M1000 Eight Unit Double Web Press with drying oven; One (1) Baker Perkins G-14 Six Unit Single Heat Set-Web Press with drying oven; and One (1) Harris Press Model No. M110 with TEC drying oven. The ovens are natural gas fueled.

The facility opted for federally enforceable emission limitations of volatile organic compounds (VOC) and hazardous air pollutants (HAPs), to keep the facility below major source status. The construction permit 0112369-005-AC, issued December 12, 2006 limits VOC and total HAPs to 61 and 5 tons, in any consecutive twelve-month period, respectively. Compliance with these limitations is accomplished through recordkeeping and reporting requirements that will provide reasonable assurance that the operation remains a minor source of air pollution.

The figure below shows a simplified flow chart of the operation.



Wilco Press Flowchart

The facility consists of the following emissions unit (EU).

EU ID	Description of Emissions Unit
003	A publishing/printing press facility consisting of: One (1) Harris Model No. M1000 Eight Unit Double Web Press with drying oven; One (1) Baker Perkins G-14 Six Unit Single Heat Set-Web Press with drying oven; and One (1) Harris Press Model No. M110 with TEC drying oven. The ovens are natural gas fueled.

APPLICABLE REGULATIONS

The applicable regulations are summarized in the table, on the next page:

SECTION 1. GENERAL INFORMATION

Primary Applicable Regulations	
Summary of Federal Regulations	Emission Unit
N/A	
Summary of State of Florida Statutes and Regulations	Emission Unit
Chapter 403, Florida Statutes 62-4 F.A.C. - Permits 62-210 F.A.C. - Stationary Sources 62-296.320(2), F.A.C. - Objectionable Odor* 62-296.320(1) (a), F.A.C. - VOC or Organic Solvent Emissions 62-296.320(4) (b), F.A.C. - General Visible Emissions Standards 62-296.320(1) (a) F.A.C. - VOC or Organic Solvent Emissions62-296.320(4) (c), F.A.C. - Unconfined Emissions of Particulate Matter	FACILITY WIDE
63-4.070(3), F.A. C – Reasonable Assurance	003
Summary of Broward County Regulations	Emission Unit
Chapter 27 Air Pollution Control, Article IV, Sec. 27-175(b) & (d). These regulations refer to: Concealment of emissions (b)* & Maintenance (d)*	FACILITY WIDE

*Not federally enforceable

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility is a minor source of VOC and HAP in accordance with Chapter 62-213 (Title V), F.A.C. The VOC and HAP emissions are limited in order to avoid major source (Title V) applicable requirements and 40 CFR 63 , Subpart KK- National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Printing and Publishing Industry.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Environmental Engineering and Permitting Division (EEPD). The EEPD's physical and mailing address is 1 North University Drive, Mailbox 201, Plantation, Florida 33324 and the main telephone number is 954-519-1483. All documents related to applications for permits to operate an emissions unit shall be submitted to the EEPD.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the EEPD at: 1 North University Drive, Mailbox 201, Plantation, Florida 33324 and telephone number is 954-519-1483.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms), Appendix B (General Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1) (a), F.A.C.]
7. Renewal: Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. [Rule 62-4.090, F.A.C.]
8. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the EEPD. All synthetic non-Title V sources or all facilities with the potential to emit 10 tons/year or more of volatile organic compounds (VOC) or 25 tons/year or more of nitrogen oxides (NOx) and located in an ozone nonattainment area or ozone air quality maintenance area shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370(3), F.A.C.]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

SECTION 3. FACILITY WIDE CONDITIONS

1. **Not Federally Enforceable Objectionable Odor Prohibited.** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An “objectionable odor” means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.

[Rule 62-296.320(2) and 62-210.200 (Definitions), F.A.C.]

2. **VOC or Organic Solvents Emissions.** The owner or operator shall allow no person to 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 EEPD.

[Rule 62-296.320(1) (a), F.A.C.]

3. **General Visible Emissions.** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.

[Rule 62-296.320(4) (b), F.A.C.]

4. **General Prohibitions**

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.]

Concealment. Any stationary installation which will reasonably be expected to be a source of pollution shall obtain an appropriate and valid permit, unless exempted by rule. Furthermore, 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 applicable provisions. [Rule 62-4.030, F.A.C.] and [Broward County Code, Sec. 27-175(b) – Not Federally Enforceable]

Maintenance. No person shall operate any air pollution control equipment or systems without proper maintenance to assure compliance with applicable emission limits. [Rule 62-210.300 (2) (a) 2, F.A.C.] and [Broward County Code, Sec. 27-175(d) – Not Federally Enforceable]

5. **Unconfined Emissions of Particulate Matter**

1. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.

2. Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.

3. Reasonable precautions include the following:

- a. Paving and maintenance of roads, parking areas and yards.

- b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.

- c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.

- d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate

SECTION 3. FACILITY WIDE CONDITIONS

from becoming airborne.

- e. Landscaping or planting of vegetation.
- f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- g. Confining abrasive blasting where possible.
- h. Enclosure or covering of conveyor systems.
- i. Substitution of powdery materials with granular or palletized materials, where possible.

4. In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

[Rule 62-297.320(4) (c), F.A.C., renewal application received August 17, 2017.]

6. Special Compliance Tests. When EEPD, 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 Department 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, unless the Department obtains other information sufficient to demonstrate compliance. The owner or operator of the emissions unit shall provide a report on the results of said tests to the EEPD in accordance with the provisions of subsection 62-297.310(10), F.A.C.
[Rule 62-297.310(8) (c), F.A.C.]

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

EU 003

This section of the permit addresses the following emissions unit.

EU ID	Description of Emissions Unit
003	A publishing/printing press facility consisting of: One (1) Harris Model No. M1000 Eight Unit Double Web Press with drying oven; One (1) Baker Perkins G-14 Six Unit Single Heat Set-Web Press with drying oven; and One (1) Harris Press Model No. M110 with TEC drying oven. The ovens are natural gas fueled.

EMISSION LIMITING STANDARDS

1. Facility Wide VOC, Total HAP and Individual HAP Emissions. The facility's volatile organic compounds (VOC) emissions shall be less than 61 tons in any consecutive twelve -month period. The facility's total HAP emissions shall be less than 5 tons in any consecutive twelve-month period.
[Rule 62-4.070(3), F.A.C. and Construction Permit 0112369-005-AC]

RECORDKEEPING REQUIREMENTS

2. VOC Content: The owner or operator shall determine the VOC content of all inks, solvents, solvent-based materials, coatings, fountain solutions or any other product potentially containing volatile organic compounds, and shall monitor the usage of such materials at the referenced emission unit by recording and maintaining the following information:
 - a. The VOC content for each material containing or emitting VOC.
 - b. The material utilization rate on a monthly basis, for all materials containing or emitting VOC used at the referenced emission unit.
 - c. The total monthly VOC emission rates for each material, calculated from the monthly material utilization rates and individual product VOC content, calculated for the preceding month no later than 20 days after the end of that month.
 - d. A rolling consecutive 12-month total emission rate for VOC, calculated from the monthly totals for the previous twelve calendar months.
 - e. Maintain Material Safety Data Sheets (MSDS) for all VOC content materials utilized.
[Rule 62-4.070(3), F.A.C.]
3. Total and Individual HAP Content: The owner or operator shall determine the total and individual HAP contents of all inks, solvents, solvent-based materials, coatings, fountain solutions or any other product potentially containing hazardous air pollutants, and shall monitor the usage of such materials at the referenced emission unit by recording and maintaining the following information:
 - a. The individual and total HAP contents for each material containing or emitting HAP.
 - b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emission unit.
 - c. The individual and total monthly HAP emission rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.
 - d. A rolling consecutive 12-month total emission rate for individual and total HAP(s), calculated from the monthly totals for the previous twelve calendar months.
 - e. Maintain Material Safety Data Sheets (MSDS) for all materials utilized.

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

EU 003

[Rule 62-4.070(3), F.A.C.]

4. Recordkeeping. The Permittee shall maintain records of the total VOC and HAP(s) emissions, including all inks, solvents, solvent-based materials, coatings, fountain solutions or any other product used during operation on a twelve-month rolling basis for a period of five (5) years. All records shall be made available to EEPD staff upon request.

[Rule 62-4.070(3), F.A.C.]