



**Permittee:**

Trend Offset Printing Services, Inc.  
10301 Busch Drive  
Jacksonville, FL 32218

**Draft Permit No.:** 0310503-006-AC

**Facility ID No.:** 0310503

**SIC No.:** 27

**Project:** Lithographic Offset Printing Presses

This permit is for the construction of a new lithographic printing press (new Heidelberg M600) and the modification of two existing lithographic printing presses (existing Heidelberg M600 and existing Heidelberg Web 8 Systems). The facility is located at 10301 Busch Drive, Jacksonville, Duval County, FL 32218; UTM Coordinates: Zone 17, 438.9 km East and 3365.9 km North; Latitude: 30 25' 25" North and Longitude: 81 38' 10" West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (FS) and Florida Administrative Code (FAC) Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297. 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 Environmental & Compliance Department, Environmental Quality Division (Department) in accordance with the terms and conditions of this permit.

**Operation Permit Application Due Date:**

**Expiration Date:**

**Environmental & Compliance Department  
Environmental Quality Division**

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**Robert Steven Pace, P.E., Manager  
Air Quality Branch**

RSP/JW

## Section I. Facility Information

### Subsection A. Facility/Project Description

This project is for constructing a new Heidelberg M600 lithographic printing press and to modify two existing printing presses (existing Heidelberg M600 and existing Heidelberg Web 8 Systems) at the facility. The construction will include the installation of a Regenerative Thermal Oxidizer (RTO) [Tann Corporation, Model No. TR1394C or equivalent] to control volatile organic compound (VOC) emissions from the existing Heidelberg Web 8 System and new Heidelberg M600 system. The existing control device on the Heidelberg Web 8 model is a catalytic oxidizer. This catalytic oxidizer will be transferred to control emissions from the existing Heidelberg M600 system.

The facility is a synthetic Non-Title V source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year (TPY) and the potential emission of any single HAP is less than 10 TPY and the potential emission of total HAP(s) is less than 25 TPY pursuant to Rule 62-210, FAC, and JEPB Rule 2.301. Prevention of Significant Deterioration requirements do not apply since the modification is to a minor facility and the modification potential emissions of any one regulated pollutant is less than 250 tons per year thereby making the modification **minor** for PSD purposes.

### Subsection B. Summary of Emission Unit (EU) ID Nos. and Brief Descriptions

<u>EU No.</u>	<u>EU Description</u>	<u>Control Device</u>
001	Heidelberg Web Systems Lithographic Offset Heat-set Printing Press M600	Advanced Web Systems, Model AWS4S MCO Catalytic Oxidizer
003	Heidelberg Web Systems Lithographic Offset Non Heat-set Printing Press V30	None
005	New Heidelberg Web Systems Lithographic Offset Heat-set Printing Press M600 and existing Heat set lithographic printing press 1985, Heidelberg Web 8 System	RTO [Tann Corporation, Model No. TR1394C]

### Subsection C. Relevant Documents

Air Operation Permit, 0310503-005-AO  
Air construction permit application received July 30, 2007

## Section II. Facility Wide Conditions

### Subsection A. General Conditions

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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2. This permit is valid only for the specific process 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 Department.
3. As provided in subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. 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 Department rules, unless specifically authorized by an order from the Department.
6. 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 Department rules. This provision includes 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 Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, 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 Department rules.Reasonable time may depend on the nature of the concern being investigated.
8. 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 the Department 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 and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.
9. In 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 source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 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.

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10. The permittee agrees to comply with changes in Department 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 Department rules.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, FAC, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - ( ) Determination of Best Available Control Technology (BACT)
  - ( ) Determination of Prevention of Significant Deterioration (PSD)
  - ( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
  - ( ) Compliance with New Source Performance Standards
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - 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 recordings for continuous monitoring instrumentation) required by this 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 Department 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 date(s) analyses were performed;
    4. The person responsible for performing the analyses;
    5. The analytical techniques or methods used;
    6. The results of such analyses.
15. When requested by the Department, 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 that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.  
[Rule 62-4.160, FAC, and Rule 2.1301, Jacksonville Environmental Protection Board (JEPB)]

**Subsection B. Specific Conditions**

1. Permittee shall notify the Department fifteen (15) days prior to EU testing.  
[Rule 62-297.310(7)(a)(9), FAC, and Rule 2.1101, JEPB]
2. Copies of the test report(s) shall be filed with the Department within forty-five (45) days of completion of testing.  
[Rule 62-297.310(8)(b), FAC, and Rule 2.1101, JEPB]

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3. Testing of emissions shall be conducted with the EU operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then EU may be tested at less than capacity; in this case subsequent EU operation is limited to 110 percent of the test load until a new test is conducted. Once the EU is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.  
[Rule 62-297.310(2), FAC, and Rule 2.1101, JEPB]
4. Any revision(s) to a permit (and application) shall be submitted to and approved by the Department prior to implementing.  
[Rule 62-4.080(2), FAC, and Rule 2.1301, JEPB]
5. Control equipment shall be provided with a method of access that is safe and readily accessible.  
[Rule 62-297.310(6), FAC, and Rule 2.1101, JEPB]
6. Stack sampling facilities shall comply with the requirements of Rule 62-297.310(6), FAC, and Rule 2.1101, JEPB.
7. Unconfined particulate matter emissions from yard operations, open stock piling of materials and /or materials handling operations shall be controlled by using the following reasonable precautions.
  - Reduced speed for vehicular traffic.
  - Use of liquid resinous adhesives or other liquid dust suppressants or wetting agents.
  - Use of paving or other asphaltic materials.
  - Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or otherwise by wetting prior to sweeping.
  - Covering of trucks, trailers, front end loaders, and other vehicles or containers to prevent spillage of particulate matter during transport.
  - Use of mulch, hydro seeding, grassing, and/or other vegetative ground cover on barren areas to prevent or reduce particulate matter from being windblown.
  - Use of hoods, fans, filters, and similar equipment to contain, capture, and vent particulate matter.
  - Enclosures or covering of conveyor systems.[Rule 62-296.320(4)(c)2. & 3., FAC, and Rule 2.1001, JEPB]
8. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing sixty (60) days prior to the expiration of the construction permit. A new schedule and request for an extension of the construction permit must be submitted.  
[Rule 62-4.080(3), FAC, and Rule 2.1301, JEPB]
9. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit. The permittee shall submit the application fee, along with compliance records and test results, to the Department ninety (90) days prior to the expiration date of the construction permit, or within 90 days of completion of compliance testing, whichever occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate.  
[Rule 62-210.300(2), FAC, and Rule 2.301, JEPB]
10. The permittee shall submit all compliance related notifications and reports required of this permit to:

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Environmental & Compliance Department  
Environmental Quality Division  
117 West Duval Street, Suite 225  
Jacksonville, FL 32202  
Telephone: (904) 630-4900  
Fax: (904) 630-3638

11. Reporting and record-keeping shall commence within 90 days of each EU initial start-up or upon commencement of initial compliance testing, whichever occurs first.  
[Rule 62-4.070, FAC, and Rule 2.1301, JEPB]
12. Facility Hazardous Air Pollutant (HAP) Emissions shall be limited to less than 10 tons per year of any single HAP, and to less than 25 tons per year of any combination of HAPs. Facility emissions shall be limited to less than 100 tons per year of Volatile Organic Compound (VOC) Emissions.  
[Rule 62-210.200(254), FAC, and Rule 2.1301, JEPB, and Applicant's request]
13. Facility wide use of heatset inks shall be limited to 4000 pounds per day (lbs/day) determined on a calendar monthly basis. Facility wide use of heatset fountain solution, blanket wash, clean-up and wash-up solvent / thinner shall be limited to 400 lbs/day determined on a calendar monthly basis. Facility wide use of non-heatset inks shall be limited to 4000 lbs/day determined on a calendar monthly basis. Facility wide use of non-heatset fountain solution, blanket wash, clean-up and wash-up solvent / thinner shall be limited to 300 lbs/day determined on a calendar monthly basis.

### **Section III. Emission Units and Conditions**

#### **Emission Unit No. 001 – Heidelberg Web Systems Lithographic Offset Heat-set Printing Press M600**

**Emission Unit Description:** Paper roll stock is directed to the offset printing press as a continuous web. Upon completion of the application of the printing ink the web is directed through two dual deck drying ovens to cure the heat set inks. The web is dried by hot air generated in the dual deck drying ovens which are each fired by a natural gas burner.

**VOC Control Device:** Advanced Web Systems, Model AWS4S MCO catalytic oxidizer with an estimated maximum of 4000 standard cubic feet per minute flow rate. The catalytic oxidizer is equipped with one natural gas fired burner rated at a maximum of  $1.5 \times 10^6$  Btu/hr. Combustion temperatures range from 600 to 800 degrees Fahrenheit.

#### **Essential Potential to Emit (PTE) Parameters**

1. The maximum process rate to the printing process shall be 640 pounds per hour (lbs/hr) of ink, 10 gallons (68 lbs of VOC) per hour of blanket wash, and 10 gallons (17.5 lbs of VOC) per hour of fountain solution.  
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]
2. This EU shall be allowed to operate continuously; i.e.: 8760 hours per year.  
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]
3. The estimated maximum heat input to the dryer burners is  $6.004 \times 10^6$  Btu/hr firing natural gas.  
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

#### **Emission Limitations and Standards**

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4. The project shall be subject to, General Pollutant Emission Limiting Standards, Volatile organic compounds emissions or organic solvents emissions.  
[Rule 62-296.320(1), FAC, and Rule 2.1001, JEPB]
5. VOC emissions shall be limited to 25 tons per year (TPY).  
[Rule 62-210.200, FAC, and Rule 2.301, JEPB, and applicant's request]
6. The minimum VOC destruction efficiency of the catalytic oxidizer shall be 95% and the minimum VOC capture efficiency shall be 100%. The minimum temperature at the outlet of the catalytic oxidizer shall be maintained at 600 degrees Fahrenheit. This temperature shall be maintained during all periods of operation of the press. The minimum temperature change across the catalytic oxidizer (outlet minus inlet) shall be maintained within 10% of the average temperature change recorded during the initial performance test.  
[Rule 62-4.070, FAC, and Rule 2.1301, JEPB]
7. Visible emissions (VE) shall be limited to less than 20% opacity.  
[Rule 62-296.320(4)(b), FAC, and Rule 2.1001, JEPB]

**Test Methods and Procedures**

8. Testing for demonstration of compliance shall be performed in accordance with EPA Reference Method 9 (as described in 40 CFR 60, Appendix A), for the visual determination of opacity.  
[Rule 62-297, FAC, and Rule 2.1101, JEPB]
9. VE testing shall be conducted for a minimum period of 1 hour and shall be conducted concurrently with the VOC test.  
[Rule 62-297, FAC, and Rule 2.1101, JEPB]
10. Destruction efficiency testing for demonstration of compliance shall be performed in accordance with EPA RM 25A (as described in 40 CFR 60, Appendix A) for VOC.  
[Rule 62-296.320(1)(a), FAC, and Rule 2.1001, JEPB]
11. VOC mass flow rate and VOC concentrations at the inlet and outlet of the catalytic oxidizer shall be measured simultaneously to determine the percent reduction of VOC across the catalytic oxidizer.  
[Rule 62-296.320(1)(a), FAC, and Rule 2.1001, JEPB]
12. Demonstration of compliance for capture efficiency shall be performed in accordance with Rule 62-297.450, FAC, and Rule 2.1101, JEPB.
13. VOC capture efficiency, destruction efficiency and VE testing shall be conducted within 180 days of completion of construction of the new M600 press but not later than 90 days after completion of installation of the catalytic oxidizer on this (existing Heidelberg M600 Press) EU, whichever occurs first.  
[Rule 62-4.070, FAC, and Rule 2.1301, JEPB]

**Record-keeping and Reporting**

14. The owner or operator shall install, calibrate, maintain, and operate a continuous temperature measurement and recording device for measuring and recording the temperature at the outlet of the catalytic oxidizer.  
[Rule 62-4.070, FAC, and Rule 2.1301, JEPB]
15. Records shall be maintained monthly for the following:
  - a. Quantity and type of inks applied
  - b. VOC and HAP content (% by weight) of inks applied

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- c. Quantity of fountain solution, blanket wash, clean-up and wash-up solvent / thinner usage
- d. VOC and HAP content (% by weight) of fountain solution, blanket wash, clean-up and wash-up solvent / thinner
- e. VOC and HAP emission calculations for the calendar month using data collected and testing results

[Rule 62-4.070 and 62-4.160, FAC, and Rule 2.1301, JEPB]

16. Twelve month rolling total VOC and HAP (s) emission calculations shall be performed monthly. Data shall be maintained for a minimum period of five (5) years.

[Rule 62-4.070 and 62-4.160, FAC, and Rule 2.1301, JEPB]

17. Quarterly reports shall be submitted to the Department of the monthly records required by specific condition no. 15, and of the temperature recordings and calculations required by specific condition no. 14. The quarterly reports shall be submitted by the 30th day of the following month after the end of each quarter (January - March, April - June, July - September, and October - December). The 12 month rolling total VOC and HAP emission calculation required by specific condition no. 16 shall also be submitted with the quarterly report.

[Rule 62-4.070, FAC, and Rule 2.1301, JEPB]

**Emission Unit No. 003 – Heidelberg Web Systems Lithographic Offset Non Heat-set Printing Press V-30**

Emissions Unit Description: Paper roll stock is directed to the offset printing press as a continuous web. Upon completion of the application of the printing ink the web is air-dried.

**Essential Potential to Emit (PTE) Parameters**

1. The maximum process rate to the printing process shall be 610 lbs/hr of ink, one (1) gallon (6.8 lbs of VOC) per hour of blanket wash, and one (1) gallon (1.75 lbs of VOC) per hour of fountain solution.

[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

2. This EU shall be allowed to operate continuously; i.e.: 8760 hours per year.

[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

**Emission Limitations and Standards**

3. The project shall be subject to, General Pollutant Emission Limiting Standards, Volatile organic compounds emissions or organic solvents emissions.

[Rule 62-296.320(1), FAC, and Rule 2.1001, JEPB]

4. VOC emissions shall be limited to 49 TPY.

[Rule 62-210.200, FAC, and Rule 2.301, JEPB, and applicant’s request]

5. Visible emissions (VE) shall be limited to less than 20% opacity.

[Rule 62-296.320(4)(b), FAC, and Rule 2.1001, JEPB]

**Test Methods and Procedures**

6. Testing for demonstration of compliance shall be performed, upon request, in accordance with EPA Reference Method 9 (as described in 40 CFR 60, Appendix A), for the visual determination of opacity.

[Rule 62-297.310(7)(a)4., FAC, and Rule 2.1101, JEPB]

**Record-keeping and Reporting**

7. Records shall be maintained monthly for the following:

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- a. Quantity and type of inks applied
- b. VOC and HAP content (% by weight) of inks applied
- c. Quantity of fountain solution, blanket wash, clean-up and wash-up solvent / thinner usage
- d. VOC and HAP content (% by weight) of fountain solution, blanket wash, clean-up and wash-up solvent / thinner
- e. VOC and HAP emissions calculations for the calendar month using data collected

[Rule 62-4.070 and 62-4.160, FAC, and Rule 2.1301, JEPB]

8. Twelve month rolling total VOC and HAP (s) emission calculation shall be performed monthly on EU No. 003. Data shall be maintained for a minimum period of five (5) years.

[Rule 62-4.070, FAC, and Rule 2.1301, JEPB]

9. Quarterly reports shall be submitted to the Department of the monthly records required by specific condition no. 7. The quarterly reports shall be submitted by the 30th day of the following month after the end of each quarter (January - March, April - June, July - September, and October - December). The 12 month rolling total VOC and HAP emission calculation required by specific condition no. 8 shall also be submitted with the quarterly report.

[Rule 62-4.070, FAC, and Rule 2.1301, JEPB]

**Emission Unit No. 005 – No. 2 Heidelberg Web Systems Lithographic Offset Heat-set Printing Press M600 and existing Heidelberg Web Systems Lithographic Offset Heat-set Printing Press 8**

Emission Unit Description: No. 2 Heidelberg M600 Press - Paper roll stock is directed to the offset printing press as a continuous web. Upon completion of the application of the printing ink the web is directed through two dual deck drying ovens [Model No. ECC 093-1020], to cure the heat set inks. The web is dried by hot air generated in the dual deck drying ovens which are each fired by a natural gas burner. Existing Heidelberg Press 8 - Paper roll stock is directed to the offset printing press as a continuous web. Upon completion of the application of the printing ink the web is directed through a single dryer oven to cure the heat set inks. The web is dried by hot air generated in the dryer which is fired by two natural gas fired burners.

VOC Control Device: Regenerative Thermal Oxidizer (RTO) [Tann Corporation, Model No. TR1934C or equivalent]

**Essential Potential to Emit (PTE) Parameters**

1. No. 2 Heidelberg M600 Press - The maximum process rate to the printing process shall be 640 pounds per hour (lbs/hr) of ink, 10 gallons (68 lbs of VOC) per hour of blanket wash, and 10 gallons (17.5 lbs of VOC) per hour of fountain solution. Existing Heidelberg Press 8 - The maximum process rate to the printing process shall be 600 pounds per hour (lbs/hr) of ink, 11 gallons (74.8 lbs of VOC) per hour of blanket wash, and 11 gallons (19.25 lbs of VOC) per hour of fountain solution.

[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

2. This EU (each press) shall be allowed to operate continuously; i.e.: 8760 hours per year.

[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

3. No. 2 Heidelberg M600 Press - The estimated maximum heat input to the dryer burners is  $6.004 \times 10^6$  Btu/hr firing natural gas. Existing Heidelberg Press 8 - The estimated maximum heat input to two dryer burners are  $4.0 \times 10^6$  Btu/hr firing natural gas.

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[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

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**Emission Limitations and Standards**

4. The project shall be subject to, General Pollutant Emission Limiting Standards, Volatile organic compounds emissions or organic solvents emissions.  
[Rule 62-296.320(1), FAC, and Rule 2.1001, JEPB]
5. VOC emissions shall be limited to 25 tons per year (TPY).  
[Rule 62-210.200, FAC, and Rule 2.301, JEPB, and applicant's request]
6. The minimum VOC destruction efficiency of the regenerative thermal oxidizer (RTO) shall be 95% and the minimum VOC capture efficiency shall be 100%. The minimum temperature at the outlet of the RTO shall be maintained at 1400 degrees Fahrenheit. This temperature shall be maintained during all periods of operation of the press.  
[Rule 62-4.070, FAC, and Rule 2.1301, JEPB, and applicant's request]
7. Visible emissions (VE) shall be limited to less than 20% opacity.  
[Rule 62-296.320(4)(b), FAC, and Rule 2.1001, JEPB]

**Test Methods and Procedures**

8. Testing for demonstration of compliance shall be performed in accordance with EPA Reference Method 9 (as described in 40 CFR 60, Appendix A), for the visual determination of opacity.  
[Rule 62-297, FAC, and Rule 2.1101, JEPB]
9. VE testing shall be conducted for a minimum period of 1 hour and shall be conducted concurrently with the VOC test.  
[Rule 62-297, FAC, and Rule 2.1101, JEPB]
10. Destruction efficiency testing for demonstration of compliance shall be performed in accordance with EPA RM 25A (as described in 40 CFR 60, Appendix A) for VOC.  
[Rule 62-296.320(1)(a), FAC, and Rule 2.1001, JEPB]
11. VOC mass flow rate and VOC concentrations at the inlet and outlet of the RTO shall be measured simultaneously to determine the percent reduction of VOC across the RTO.  
[Rule 62-296.320(1)(a), FAC, and Rule 2.1001, JEPB]
12. Demonstration of compliance for capture efficiency shall be performed in accordance with Rule 62-297.450, FAC, and Rule 2.1101, JEPB.
13. VOC capture efficiency, destruction efficiency and VE testing shall be conducted within 180 days of completion of construction of the new M600 press.  
[Rule 62-4.070, FAC, and Rule 2.1301, JEPB]

**Record-keeping and Reporting**

14. The owner or operator shall install, calibrate, maintain, and operate a continuous temperature measurement and recording device for measuring and recording the temperature at the outlet of the RTO.

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- 15. Records shall be maintained monthly for the following:
  - a. Quantity and type of inks applied
  - b. VOC and HAP content (% by weight) of inks applied
  - c. Quantity of fountain solution, blanket wash, clean-up and wash-up solvent / thinner usage
  - d. VOC and HAP content (% by weight) of fountain solution, blanket wash, clean-up and wash-up solvent / thinner
  - e. VOC and HAP emission calculations for the calendar month using data collected and testing results
 [Rule 62-4.070 and 62-4.160, FAC, and Rule 2.1301, JEPB]
  
- 16. Twelve month rolling total VOC and HAP (s) emission calculations shall be performed monthly. Data shall be maintained for a minimum period of five (5) years.  
 [Rule 62-4.070 and 62-4.160, FAC, and Rule 2.1301, JEPB]
  
- 17. Quarterly reports shall be submitted to the Department of the monthly records required by specific condition no. 15, and of the temperature recordings and calculations required by specific condition no. 14. The quarterly reports shall be submitted by the 30th day of the following month after the end of each quarter (January - March, April - June, July - September, and October - December). The 12 month rolling total VOC and HAP emission calculation required by specific condition no. 16 shall also be submitted with the quarterly report.  
 [Rule 62-4.070, FAC, and Rule 2.1301, JEPB]

**FILING AND ACKNOWLEDGMENT**

**FILED**, on this date, pursuant to S.120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date