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Wetlands Management	Scott Emery, Ph.D.

Mr. John Tevlin, Jr.
Vice President
Newspaper Printing Company
5210 S. Lois Ave.
Tampa, FL 33611

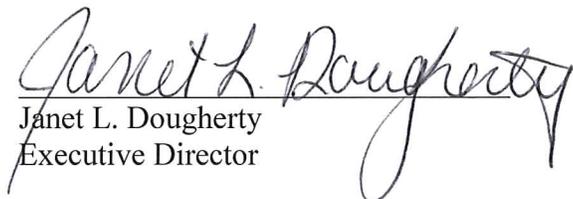
RE: 0570437-019-AC
Minor Air Construction Permit
New Regenerative Thermal Oxidizer (RTO)

Dear Mr. Tevlin, Jr.:

On July 1, 2015, you submitted an application for an air construction permit to construct a new Regenerative Thermal Oxidizer (RTO) at your off-set lithographic printing facility. This facility is located in Hillsborough County at 5210 S. Lois Ave., Tampa, Florida 33611.

After review of the application, the following documents have been prepared: the Technical Evaluation and Preliminary Determination; the Draft Permit; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit. The Public Notice of Intent to Issue Air Permit is the actual notice that you must publish in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact Diana M. Lee, P.E. at 813-627-2600 x1276, or by e-mail at lee@epchc.org.

Sincerely,


Janet L. Dougherty
Executive Director

Enclosures

JLD/LAW/law

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION
FOR

Newspaper Printing Company

Hillsborough County

Construction Permit

Application Number

0570437-019-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

July 31, 2015

I. Project Description

A. Applicant:

Mr. John Tevlin, Jr.
Vice President
Newspaper Printing Company
5210 S. Lois Ave.
Tampa, FL 33611

B. Engineer:

James Show, P.E.
P.E. No.: 34361
Grove Scientific and Engineering Company
6140 Edgewater Dr., Suite F
Orlando, FL 32810

C. Project and Location:

This permit authorizes the construction of a new 9,000 cfm Adwest Technologies, Inc., Serial No. 2715, 2.6 MMBtu/hr natural gas fired Regenerative Thermal Oxidizer (RTO) to control emissions from Press Lines B – E.

The project has been assigned NEDS Source Classification Code Nos. 3-90-006-89 (Industrial Processes, In-process Fuel Use, Natural Gas) and 4-05-004-01 (Petroleum and Solvent Evaporation, Printing/Publishing, Lithographic, Ink Usage). The Standard Industrial Code for the project is No. 27 for Miscellaneous Publishing. The project is located at 5210 South Lois Avenue, Tampa, FL 33611. UTM Coordinates of the location are 17- 350.50E and 3085.50N.

D. Process and Controls:

This permit authorizes the construction of a new Regenerative Thermal Oxidizer (RTO) to control emissions from Press Lines B, C, D, and E, at an off-set lithographic printing facility. The presses, which are described in the table below, each have one natural gas fired drying oven.

This Adwest Technologies, Inc., Serial No. 2715, 2.6 MMBtu/hr natural gas fired RTO will replace the two existing catalytic oxidizers. Due to space limitations at the facility, the catalytic oxidizers will be removed and the RTO will be constructed in the area where the oxidizers are currently located. During the construction of the new RTO, the presses may operate without the control device operating for a maximum of 60 days. The facility estimated emissions from this mode of operation based on actual production during September and October 2014. Based on the information provided, the uncontrolled VOC emissions were estimated to be 7.8 tons while operating in this mode.

The facility-wide VOC emissions are limited to 49.6 tons/year. The potential VOC emissions are based on an assumed material retention rate, depending on the type of material used, and a 90% destruction efficiency for the RTO and include emissions from the combustion of natural gas in the RTO and the press dryers. The potential emissions also include emissions due to the combustion of the ink solvents in the RTO. As provided by the applicant, the ink solvent has been equated to an equivalent amount of No. 2 fuel oil (gallons/year), which is assumed to be combusted in the RTO. The emissions from the ink solvents combustion are calculated using emission factors from AP 42 Ch. 1-3 – Fuel Oil Consumption. During the construction period, the worst case facility-wide uncontrolled potential emissions were calculated to be 42.4 tons in a two month period.

A review of our files shows that there have been no odor complaints about the facility in the last ten years. In order to provide reasonable assurance that the construction project will not result in objectionable odors, a Gaussian Plume Model was used to estimate the maximum downwind concentration at the nearest residence from Newspaper Printing. The nearest residence is approximately 100 meters due East of the facility. It was assumed that approximately 25% of the ink is Petroleum Distillate (Naphtha), which has an odor threshold of approximately 1 ppm. Using information submitted with the 2013 stack test report and the ink usage rates, the downwind concentration of naphtha was calculated to be well below the 1 ppm odor threshold. There are no ambient air quality standards for petroleum distillates, just the VOC emission limits in the permits.

However, as a precaution, this permit includes a requirement to walk around the perimeter of the facility once per day and curtail operations as necessary if odors are noted. In addition, this permit requires the facility to remove the rain caps from the press exhaust vents located on the roof prior to starting operation without the control device operating in order to ensure better dispersion of the emissions from the presses.

Also, in order to provide operational flexibility, this permit does not include a limit on the material usages. Each type of material used at the facility has a different VOC content. The facility may be able to use a larger amount of one material and still maintain compliance with the VOC Potential to Emit (PTE). Therefore, in order to provide the facility maximum flexibility, this permit includes a limit on the overall facility VOC PTE, but does not include a limit on the material usage.

In addition to the presses listed below, the facility operates a Heidelberg, Model No. SX74-5+L, sheetfed offset printing press with an integrated coater for applying aqueous coatings. This press vents indoors uncontrolled. The facility's operations also include a plate manufacturing operation and a scrap collection system. The scrap collection system, which is exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C., includes two (2) baler systems and sixteen (16) filter bags that vent inside the building.

Press Lines

Press ID	Type	Drying Oven	Air Flow Rate (scf)
B	4 Unit Heidelberg (heatset)	ContiWeb Ecoweb 7.0-1020	1,100
C	4 Unit Goss (heatset)	ContiWeb Ecoweb 7.0-1020	1,187
D	4 Unit Heidelberg (heatset)	ContiWeb Ecoweb 7.0-1020	1,950
E	16 Unit Heidelberg (heatset or coldset)	TEC, C-135	1,950

The facility is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C.

E. Application Information:

Received on: July 1, 2015
Information Requested: NA
Application Complete: July 1, 2015

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is subject to the requirements of Rule 62-212.300, General Preconstruction Review Requirements, F.A.C., since the project is not exempt from the permit requirements in Rule 62-210.300, F.A.C.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C. since the facility is a Synthetic Non-TV facility by state definition.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the project is a source of volatile organic compounds (VOC) emissions and a potential source of odor.

This project is not subject to the requirements of Rule 62-296.340, through 62-296.470, Specific Emission Limiting and Performance Standards, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.500, Volatile Organic Compounds and Nitrogen Oxides Reasonably Available Control Technology, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology - Lead, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology – Particulate Matter, F.A.C. since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since there is no applicable source specific category in this rule.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

III. Summary of Emissions

Emission Unit (EU) No. 002 - Heatset Presses with Oxidizers

Pollutant	Potential Emissions (tons/yr)	Actual Emissions (tons/yr)	Increase in Emissions (tons/yr)	Allowable
VOC	33.2	8.4	24.8	NA
PM	0.5	0.02	0.5	NA
NO _x	5.9	0.6	5.3	NA
SO ₂	0.03	0.004	0.03	NA
CO	4.6	0.5	4.1	NA

- Actual Emissions are based on the average of 2012 and 2013 AOR data.
- The potential VOC emissions are based on an assumed material retention rate, depending on the type of material used, and a 90% destruction efficiency for the RTO. Potential emissions also include combustion of natural gas in the RTO and dryers and emission factors from AP 42 5th Edition, Ch. 1.4 – Natural Gas Combustion, Tables 1.4-1 and 1.4-2.
- The PM, NO_x, SO₂, and CO emissions are calculated based on the following:
 - Combustion of natural gas in the RTO and dryers and emission factors from AP 42 5th Edition, Ch. 1.4 – Natural Gas Combustion, Tables 1.4-1 and 1.4-2.
 - Combustion of the ink solvents in the RTO. As provided by the applicant, the ink solvent has been equated to an equivalent amount of No. 2 fuel oil (gallons/year), which is assumed to be combusted in the RTO. The emissions from the ink solvents combustion are based on emission factors from AP 42 Ch. 1-3 – Fuel Oil Consumption.

IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the

Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit for the construction of the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

COMMISSION
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Victor D. Crist
Ken Hagan
Al Higginbotham
Lesley "Les" Miller, Jr.
Sandra L. Murman
Stacy White



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Waste Management Hooshang Boostani, P.E.
Water Management Sam Elrabi, P.E.
Wetlands Management Scott Emery, Ph.D.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an

Application for Air Permit by:

Newspaper Printing Company
5210 S. Lois Ave.
Tampa, FL 33611

Project No. 0570437-019-AC
Minor Air Construction Permit
Hillsborough County, Florida

Authorized Representative:

John Tevlin, Jr.

*New Regenerative Thermal Oxidizer
(RTO)*

Facility Location: Newspaper Printing Company operates the existing Tampa Facility, which is located in Hillsborough County at 5210 S. Lois Ave., Tampa, FL, 33611.

Project: This permit authorizes the construction of a new 9,000 cfm Adwest Technologies, Inc., Regenerative Thermal Oxidizer (RTO) to control emissions from the four Press Lines at the off-set lithographic printing facility.

Permitting Authority: Applications for air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Environmental Protection Commission of Hillsborough County. The Permitting Authority's physical address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's mailing address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's telephone number is 813/627-2600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E. for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided

An agency with values of environmental stewardship, fairness, and cooperation

Roger P. Stewart Center

3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - www.epchc.org

An Affirmative Action / Equal Opportunity Employer

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this written notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this written notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602, before the deadline. 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 (in a proceeding initiated by another party) 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 Permitting Authority's action is based must

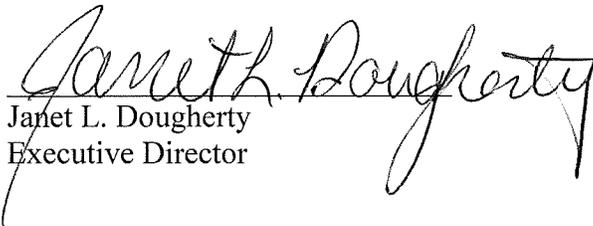
WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile number 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 when and how each petitioner received notice of the agency action or proposed decision; (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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority's final action may be different from the position taken by it in this written notice of Intent to Issue Air Permit. 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.

Executed in Hillsborough County, Florida.


Janet L. Dougherty
Executive Director

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested or by certified mail before the close of business on the date indicated below to the persons listed below.

John Tevlin, Jr. – Newspaper Printing Company
Florida Department of Environmental Protection, Southwest District (posting online)
James Show, P.E. – Grove Scientific and Engineering Co. (via e-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)



(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT
ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
Draft Minor Air Construction Permit
Project No. 0570437-019-AC
Newspaper Printing Company
Hillsborough County, Florida

Applicant: The applicant for this project is Newspaper Printing Company. The applicant's authorized representative and mailing address is: John Tevlin, Jr., 5210 S. Lois Ave., Tampa, FL 33611.

Facility Location: Newspaper Printing Company operates the existing Tampa Facility, which is located in Hillsborough County at 5210 S. Lois Ave., Tampa, FL 33611.

Project: This permit authorizes the construction of a new 9,000 cfm Adwest Technologies, Inc. Regenerative Thermal Oxidizer (RTO) to control emissions from the four Press Lines at the off-set lithographic printing facility.

Permitting Authority: Applications for air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Environmental Protection Commission of Hillsborough County. The Permitting Authority's physical address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's mailing address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's telephone number is 813/627-2600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact Diana M. Lee, P.E. for additional information at the address and phone number listed above.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the

14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602, before the deadline. 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 (in a proceeding initiated by another party) 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 Permitting Authority'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, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile number 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 when and how each petitioner received notice of the agency action or proposed decision; (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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority's final action may be different from the position taken by it in this written notice of Intent to Issue Air Permit. 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 for this proceeding.

COMMISSION
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Victor D. Crist Sandra L. Murman
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Wetlands Management Scott Emery, Ph.D.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Mr. John Tevlin, Jr.
Vice President
Newspaper Printing Company
5210 S. Lois Ave.
Tampa, FL 33611

RE: Hillsborough County Air Permitting

Dear Mr. Tevlin, Jr.:

Enclosed is Permit Number 0570437-019-AC for the construction of a new 9,000 cfm Adwest Technologies, Inc., Regenerative Thermal Oxidizer (RTO) to control emissions from Press Lines B – E, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit 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, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, Florida 33619; 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 this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

DRAFT

Janet L. Dougherty
Executive Director

JLD/LAW/law

cc: Florida Department of Environmental Protection, Southwest District (posting online)
James Show, P.E. – Grove Scientific and Engineering Co. (via e-mail)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the clerk, receipt of which is hereby acknowledged.

DRAFT

Clerk

Date

COMMISSION

Kevin Beckner	Lesley "Les" Miller, Jr.
Victor D. Crist	Sandra L. Murman
Ken Hagan	Stacy White
Al Higginbotham	



EXECUTIVE DIRECTOR
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Wetlands Management	Scott Emery, Ph.D.

DRAFT

PERMITTEE:

Newspaper Printing Company
5210 S. Lois Ave.
Tampa, FL 33611

PERMIT/CERTIFICATION

Permit No: 0570437-019-AC
County: Hillsborough
Expiration Date: September 30, 2016
Project: New Regenerative Thermal Oxidizer (RTO)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. 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 EPC and made a part of hereof and specifically described as follows:

This permit authorizes the construction of a new Regenerative Thermal Oxidizer (RTO) to control emissions from Press Lines B, C, D, and E, at an off-set lithographic printing facility. During construction of the new RTO, the presses, which are described in the table below, may operate without the control device operating. Each press has one natural gas fired drying oven.

This Adwest Technologies, Inc., Serial No. 2715, 2.6 MMBtu/hr natural gas fired RTO will replace the two existing catalytic oxidizers. Due to space limitations at the facility, the catalytic oxidizers will be removed and the RTO will be constructed in the area where the oxidizers are currently located. During the construction of the new RTO, the presses may operate without the control device operating for a maximum of 60 days.

In addition to the presses listed below, the facility operates a Heidelberg, Model No. SX74-5+L, sheetfed offset printing press with an integrated coater for applying aqueous coatings. This press vents indoors uncontrolled. The facility's operations also include a plate manufacturing operation and a scrap collection system. The scrap collection system, which is exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C., includes two (2) baler systems and sixteen (16) filter bags that vent inside the building.

An agency with values of environmental stewardship, fairness, and cooperation

Roger P. Stewart Center

3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - www.epchc.org

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Press Lines

Press ID	Type	Drying Oven	Air Flow Rate (scf)
B	4 Unit Heidelberg (heatset)	ContiWeb Ecoweb 7.0-1020	1,100
C	4 Unit Goss (heatset)	ContiWeb Ecoweb 7.0-1020	1,187
D	4 Unit Heidelberg (heatset)	ContiWeb Ecoweb 7.0-1020	1,950
E	16 Unit Heidelberg (heatset or coldset)	TEC, C-135	1,950

Location: 5210 S. Lois Avenue, Tampa, FL 33611

UTM: 17-350.5 E and 3085.5 N NEDS NO: 0437

EU ID: 002 - Heatset Presses with RTO

References Permit Nos.: 0570437-013-AC, 0570437-015-AC, and 0570437-017-AC

Replaces Permit No.: NA

PERMITTEE:
Newspaper Printing Company

PERMIT/CERTIFICATION NO.: 0570437-019-AC
PROJECT: New Regenerative Thermal Oxidizer (RTO)

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SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. The permittee shall not 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.]
5. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.
6. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rules 62-296.320(1), F.A.C., and 62-4.070(3), F.A.C.]
 - A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
 - B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
 - C) Immediately attend to all spills/waste as appropriate.
7. During construction of the RTO, the following conditions shall apply: [Rule 62-4.070(3), F.A.C. and Permit Application Received July 1, 2015]
 - A) The operation of the presses venting uncontrolled during the construction period shall not exceed 60 days.
 - B) Any rain caps on the press exhaust vent(s) shall be removed prior to operating the presses uncontrolled.
 - C) Once per day, while the presses are operating, walk around the facility perimeter to check for any objectionable odors. If odors are noted, curtail operations as necessary.
 - D) The uncontrolled emissions generated from the presses during the construction period shall count towards the facility-wide emissions limitation specified in Specific Condition No. 8.A).

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- E) Records shall be maintained on the number of days the facility operated the presses uncontrolled.
8. As requested by the permittee, in order to remain a synthetic minor source of VOC and HAPs, the following restrictions and terms shall apply: [Rule 62-4.070(3), F.A.C. and Permit Application Received July 1, 2015]
- A) The maximum facility-wide VOC emissions shall not exceed 49.6 tons per any twelve consecutive month period.
 - B) The RTO shall maintain a minimum destruction efficiency of 90 percent by weight.
 - C) The RTO afterburner temperature shall be maintained at a minimum of 1,500 °F under normal operating conditions.
 - D) When Press line E is in the heatset operating mode, the damper on the dryer exhaust duct(s) shall be in the position that directs the dryer exhaust gas to the RTO.
 - E) The VOC capture efficiency of each drying oven (drying oven to RTO) shall be 100 percent by weight.
 - F) For emissions calculation purposes, the product VOC retention of heatset inks shall be 20 percent by weight.
 - G) For emissions calculation purposes, the blanket wash capture efficiency shall be 40 percent by weight.
9. In order to ensure compliance with Specific Condition No. 8, the permittee shall maintain a continuous temperature measuring device to monitor and record the temperature of the RTO. [Rule 62-4.070(3), F.A.C.]
10. Visible emissions from the facility, including the exhaust from the RTO controlling the heatset presses, shall not be equal to or greater than 20% opacity. [Rule 62-296.320(4)(b)1., F.A.C.]
11. Test the RTO for destruction efficiency (DE) and visible emissions (VE) within 60 days of startup of the RTO. Testing shall be performed utilizing the test methods listed in Specific Condition No. 13. Submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of testing. [Rules 62-297.310(7)(a)4. and 62-297.310(8)(b), F.A.C., and Ch. 1-3.52(6), Rules of the EPCHC]
12. Testing of emissions should be conducted with the source operating at capacity. Capacity is defined as all heatset presses operating under normal operating conditions. If it is impracticable to test at the testing capacity, an emissions unit may be tested at less than the testing capacity. If an emissions unit is tested at less than the testing capacity, another emissions test shall be conducted and completed no later than 60 days after the emissions unit operation exceeds 110% of the capacity at which its most recent emissions test was conducted. The facility shall be limited to operating only as many of the continuous feed, lithographic printing presses simultaneously as were in operation during the test. Failure to submit the input rates and actual operating conditions may invalidate the test. The test report shall also include the RTO temperature

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and the number of presses in operation during the test. Testing procedures shall be consistent with the requirements of Rule 62-297, F.A.C. [Rules 62-4.070(3) and 62-297.310(3), F.A.C.]

13. Compliance with Specific Condition Nos. 8 and 10 shall be determined using EPA Methods 1, 2, 4, 9, 24, 25, or 25A contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. EPA Methods 1, 2, and 4 in conjunction with EPA Method 25 or 25A shall be performed on the control device inlet and outlet. Ink manufacturers' "As Supplied" VOC data sheet or test information (based upon EPA Method 24) shall be used to determine the VOC content of heatset inks. Conduct a material balance of the raw materials to calculate the pounds of hydrocarbons available at the inlet of the RTO. The sampling time for each of the three EPA Method 25A runs shall be at least 60 minutes. An EPA VOC data sheet (properties of the coating "As Supplied" by the manufacturer) shall be submitted for each ink used. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. [Rule 62-4.070(3), F.A.C.]

14. At least 15 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the EPCHC, unless shorter notice is agreed to by the EPCHC. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the appropriate air compliance program a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the appropriate air compliance program by mutual agreement.. [Rule 62-297.310(9), F.A.C.]

15. Compliance with the emission limitation/restrictions of Specific Condition Nos. 7 and 8 shall be demonstrated through the use of a monthly recordkeeping system. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request and remain on file for at least three (3) years. The records shall include, but are not limited to, the following: [Rules 62-4.070(3), F.A.C. and 62-4.160(14)(b), F.A.C.]

- A) Month, Year
- B) The usage of each material
- C) The amount of VOC (in pounds) and the amount of any HAP (in pounds) emitted from the coldset operation, the heatset operation, the sheetfed operation, the plate manufacturing, and the clean-up operation. The capture and retention efficiencies listed in Specific Condition No. 7 and 8 shall be used when calculating emissions.
- D) A rolling total of material usage and emissions, as specified in B) and C) above, for the most recent twelve months, calculated monthly.
- E) VOC content "as supplied" for each ink used.
- F) VOC content of clean-up solvent used.
- G) The specific gravity or density of all VOC containing materials.

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- H) Operating log indicating the time periods (hours) that Press lines B, C, D and E are operated in the "heatset" mode.
- I) Daily temperature log for the RTO during heatset operations.
- J) Records as required in Specific Condition No. 7.E)
- K) Inspection and maintenance log for the RTO and associated ductwork, including the dryers, as specified in Specific Condition No. 17.

16. If materials are not speciated in the recordkeeping system, the highest material VOC concentration in the corresponding material group shall be used in determining individual and total VOC emissions. In all calculations, an average VOC content of a material shall not be used in place of the highest possible VOC content of that material. Individual and total HAP emissions shall be calculated in the same manner. [Rule 62-4.070(3), F.A.C.]

17. The pollution control equipment (RTO and associated ductwork) and the dryers shall be maintained in good repair to perform adequately the function for which they were intended, as required by the manufacturer. All presses shall maintain an interlock system with automated dampers to ensure that all emissions generated during the heatset operations are properly vented to the RTO. All inspections and any maintenance/repairs performed should be recorded. Records shall be maintained for the most recent 12 month period and made available for inspection upon request. [Rule 62-4.070(3), F.A.C.]

18. When the Environmental Protection Commission of Hillsborough County (EPC) 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 Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(8)(c), F.A.C.]

19. The permittee shall submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. [Rule 62-210.370(3), F.A.C.]

20. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

- A) Alteration or replacement of any equipment* or major component of such equipment.
- B) Installation or addition of any equipment* which is a source of air pollution.

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- C) The facility may reconfigure the existing printing press units so that no more than 29 heatset units are controlled the RTO. This does not authorize the replacement of the printing press units, but does authorize the reconfiguration of the existing units to allow more operational flexibility (i.e. more colors may be printed on a single web) while remaining in compliance with Specific Condition Nos.7 and 8.

*Not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit.

21. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation or materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. [Rule 62-296.320(4)(c)1., F.A.C.]

22. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

23. A minimum of two copies of an air operating permit application shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of the compliance test or at least 90 days prior to the expiration date of this permit, whichever occurs first. [Rules 62-4.050(2) and 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Janet L. Dougherty
Executive Director

ATTACHMENT - GENERAL CONDITIONS

(1) 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 Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

(2) 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 Department.

(3) As provided in subsections 403.987(6) and 403.722(5), F.S., 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 acknowledgment of title, and 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.

ATTACHMENT - GENERAL CONDITIONS

(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 for 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, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

(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. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

(11) This permit is transferable only upon Department approval in accordance with Rules 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 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)
- () 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

ATTACHMENT - GENERAL CONDITIONS

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 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 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.

(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 the 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.