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PERMITTEE

IGT Global Solutions Corporation
4100 Frontage Road South, Suite 400
Lakeland, FL 33815

Authorized Representative:
Jean Turgeon, Vice President -
IGT Instant Ticket Operations

Air Permit No. 0571251-007-AO
Effective Date: June 27, 2018
Renewal Application Due Date: April 14, 2023
Expiration Date: June 13, 2023

IGT Global Solutions Corporation
Hillsborough County, Florida

PROJECT

This is the final air operation permit, which authorizes the operation of IGT Global Solutions Corporation, a wide-web, flexographic and lithographic printing facility (Standard Industrial Classification No. 2752 for Commercial Printing).

The facility is located in Hillsborough County at 2401 Police Center Drive, Suite 110, Plant City, 33566. The UTM coordinates are Zone 17, 390.90 km East, and 3096.45 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 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 Protection Commission of Hillsborough County. The Permitting Authority's physical/mailing address is: 3629 Queen Palm Dr., Tampa, Florida 33619. The Permitting Authority's telephone number is 813-627-2600.

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 Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt

of this notice. Petitions filed 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 Department'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 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 action; (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 Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602, and by filing a copy of the notice of

appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY

Janet L. Dougherty

Janet L. Dougherty
Executive Director

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.

Jean Turgeon, GTECH Printing – jean.turgeon@igt.com
Eric Oudman, IGT Global Solutions Corporation – eric.oudman@igt.com

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.

Sahand Nasseri 6/27/18
Clerk Date

FACILITY DESCRIPTION

This air operation (AO) permit authorizes the IGT Plant City facility's operation of a wide-web, flexographic and lithographic printing processes on a continuous web substrate. The facility operates one printing line consisting of 13-flexographic printing press units, 8-lithographic printing press units, and 2-inkjet printing units. All twenty-three (23) press units operate in series. The flexographic printing inks are cured by two natural gas-fired drying ovens which operate between 200 and 250 °F. Drying oven No. 1 has a Maxon, 456M burner, with a heat input rating of 4.9 MMBtu/hr. Drying oven No. 2 has a Maxon, 425 burner, with a heat input rating of 2.2 MMBtu/hr. The dryers are vented to the outside of the building and have no air pollution control devices installed. The lithographic printing inks and the inkjet printing inks are cured by ultraviolet light and infrared heat lamps, respectively. The printing line is capable of handling webs up to 20 inches wide at speeds up to 580 feet per minute. The finished product is trimmed, cut, and folded for packaging.

The facility also operates a scrap collection system, which vents indoors. Waste paper from the trim machine and the paper shredding machine is ducted to a cyclone. The larger particulate matter (PM) drops into a baler that is located inside the building. Any remaining PM from the cyclone exhausts inside the building. The scrap collection system vents indoors and is exempt from permitting. In addition, the two drying ovens, which burn natural gas, are exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C.

The IGT Plant City facility is a synthetic minor source of VOC and HAP emissions. The facility is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the facility is a potential source of VOC and PM emissions, and odor. In addition, the wide-web printing press is subject to 40 CFR 63 Subpart KK. However, because the facility is an area source of HAP, the facility is subject only to the recordkeeping and reporting requirements of 40 CFR 63.829 and 63.830.

The facility consists of the following sources within this emissions unit.

EU No.	Emission Unit Description
001	One Printing Line

APPLICABLE REGULATIONS

A summary of the applicable regulations is shown in the following table.

Regulation	EU No(s).
Federal Rule Citations	
40 CFR 63, Subpart A, NESHAP General Provisions	001
40 CFR 63, Subpart KK	001
State Rule Citations	
Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards	001

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(PSD), F.A.C.

FW1. Permitting Authority: The permitting authority for this project is the Environmental Protection Commission of Hillsborough County. The mailing address is 3629 Queen Palm Dr., Tampa, Florida 33619. All documents related to applications for permits to operate an emissions unit shall be submitted to the Environmental Protection Commission of Hillsborough County.

FW2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Environmental Protection Commission of Hillsborough County at: 3629 Queen Palm Dr., Tampa, Florida 33619.

FW3. 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); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).

FW4. 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.

FW5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the EPCHC may require the permittee to conform to new or additional conditions. The EPCHC shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the EPCHC may grant additional time. [Rule 62-4.080, F.A.C.]

FW6. 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.]

FW7. In order to limit the potential to emit and establish the facility as a synthetic minor for VOC and Hazardous Air Pollutants (HAP), the following emission limitations shall apply facility-wide per any twelve consecutive month period: [Rules 62-296.320, 62-212.300, and 62-4.070(3), F.A.C., 40 CFR 63.820(a)(2), and Permit No. 0571251-001-AC]

A) The maximum VOC emissions from the entire facility shall not exceed 85.9 tons for any 12 consecutive month period.
B) The HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 5.3 tons in any 12 consecutive month period for any individual HAP, and less than 8.6 tons in any 12 consecutive month period for any combination of HAPs.

FW8. 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 Environmental Protection Commission of Hillsborough County. All synthetic non-Title V sources 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.}

FW9. 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.]

FW10. 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 of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. [Rule 62-296.320(4)(c), F.A.C.]

FW11. 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: [Rule 62-296.320(1), F.A.C. and Permit No. 0571427-001-AC]

A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
B) Immediately attend to all spills/waste as appropriate.

FW12. 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.]

FW13. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air 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.]

FW14. Renewal: Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit, provided that this facility is operated during any period of time within the five (5) year period authorized under this 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. [Rules 62-4.070(4), 62-4.080, and 62-210.300(1), F.A.C.]

A. Flexographic and Lithographic Printing Operation

This section of the permit addresses the following emissions unit.

EU No.	Description
001	One Printing Line

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: In order to ensure compliance with Facility-wide Condition No. FW7, the following restrictions and limitations shall apply. [Rule 62-4.070(3), F.A.C. and Permit No. 0571251-001-AC]

A) Maximum material usages in any 12 consecutive month period:

Group Name	Annual Limit
Fountain Solutions	1,266 gallons/yr
Base Coats	27,931 gallons/yr
Ink Jet Inks	22,931 gallons/yr
UV Litho (Offset) Inks	5,452 gallons/yr
UV Flexo Inks	15,149 gallons/yr
Flexo Scratch-Off Inks	11,024 gallons/yr
Pre-Press Chemicals	408 gallons/yr
Water-based Overprint Inks	19,722 gallons/yr
Solvent-based Diluents	6,399 gallons/yr

B) Maximum VOC concentrations of any product used in each group category:

Group Name	Max. VOC Concentration
Fountain Solutions	1.77 lb/gallon
Base Coats	0.37 lb/gallon
Ink Jet Inks	0.48 lb/gallon
UV Litho (Offset) Inks	0.14 lb/gallon
UV Flexo Inks	0.00 lb/gallon
Flexo Scratch-Off Inks	4.96 lb/gallon
Pre-Press Chemicals	7.90 lb/gallon
Water-based Overprint Inks	2.16 lb/gallon
Solvent-based Diluents	7.27 lb/gallon

C) The hours of operation of the facility are not limited.

A.2. All volatile organic compound emissions from solvent washings shall be considered in the material usage limitations of Specific Condition No. A.1.A), unless the solvent is directed into containers that prevent evaporation into the atmosphere. [Rule 62-4.070(3), F.A.C., and Permit Nos. 0571251-001-AC]

EMISSIONS STANDARD

A.3. Visible emissions from the facility, including the exhaust from the dryers, shall not be equal to or greater than 20% opacity. [Rule 62-296.320(4)(b)1., F.A.C.]

COMPLIANCE METHOD

A.4. Compliance with the VOC and HAP emission limitations of Facility-wide Condition No. FW 7 shall be determined using a monthly recordkeeping system and EPA Method 24 or 24A contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The Environmental Protection Commission of Hillsborough County may accept a certification by the ink manufacturer of the composition of the ink if it is supported by actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document Number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings." The records shall include MSD sheets for each ink and solvent used and the VOC content "as supplied" for each ink and solvent used. Records of the ink composition shall be kept on site for each material and made available upon request to the Environmental Protection Commission of Hillsborough County. [Rule 62-4.070(3), F.A.C.]

NESHAP REQUIREMENTS

A.5. The permittee chooses to commit to and meet the emission limits specified in 40 CFR 63.820(a)(2) (Facility-wide Condition No. FW 7.B)) and is considered an area source of HAP. Therefore, the facility is subject only to the provisions specified in Specific Condition No. A.8 and Specific Condition No. A.10. [40 CFR 63.820(a)(3)]

A.6. Each facility for which the owner or operator commits to the limits specified in the Facility-wide Condition No. FW 7.B above to become an area source, but subsequently exceeds either of the thresholds specified in this condition for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63, Subpart KK, and would no longer be eligible to use the provisions of paragraph 40 CFR 63.820(a)(2), even if in subsequent 12-month periods the facility uses less HAP than the thresholds in 40 CFR 63.820(a)(2). [40 CFR 63.820(a)(5) and Rule 62-4.070(3), F.A.C.]

A.7. If the permittee chooses to no longer be subject to the limits specified in Facility-wide Condition No. FW 7.B above, the permittee shall notify the Environmental Protection Commission of Hillsborough County of such change. If, by no longer being subject to the limits specified in 40 CFR 63.820(a)(2), the facility at which the affected source is located becomes a major source, the permittee must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) until the source is in compliance with all relevant requirements for new affected sources. [40 CFR 63.820(a)(6) and Rule 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

A.8. Compliance with Specific Condition Nos. A.1 and A.4 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, the Florida Department of Environmental Protection 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) and 62-4.160(14)(b), F.A.C., and 40 CFR 63.829(d)]

A) Month, Year
B) The monthly amount, in gallons, and the material group name, as specified in Specific Condition No. A.1.A), for each material used
C) The specific gravity or density of each VOC containing material
D) The VOC concentration, in lb/gal, for each material used
E) The HAP concentration, in lb/gal or percentage by weight, for each individual HAP for each material used
F) The monthly amount of VOC emissions (in pounds), the monthly amount of each individual HAP emissions (in pounds), and the monthly total combined HAP emissions (in pounds) emitted for each material used
G) A rolling total of material usage and emissions, as specified above in B) and F) above, for the most recent twelve months, calculated monthly
H) Records as required by Specific Condition No. A.4

A.9. In all calculations, the highest material VOC concentration and individual HAP concentration in the corresponding material group, specified in Specific Condition No. A.1.B), shall be used in determining VOC and HAP emissions. [Rule 62-4.070(3), F.A.C. and Permit No. 0571251-001-AC]

A.10. If the permittee makes any modifications which subsequently increase the emissions of hazardous air pollutants (or the potential to emit hazardous air pollutants) such that the source is a major source that is subject to an emission standard or other requirement, the permittee shall be subject to the notification requirements of 40 CFR 63.9. [40 CFR 63.9(b), 63.820(3) and 63.820(a)(3)]