



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

RICK SCOTT  
GOVERNOR

CARLOS LOPEZ-CANTERA  
LT. GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

## FINAL PERMIT

### PERMITTEE

Better Business Forms, Inc. dba  
The Clondalkin Group  
10950 Belcher Road South  
Largo, Florida 33777

Air Permit No. 1030264-009-AO  
Permit Expires: 02/06/2019  
Largo Plant  
Minor Air Operation Permit  
Operation Permit Revision

Authorized Representative:  
Mr. Mike Barrett, Vice President of  
Business Development

This is the final permit to revise Air Operation Permit No. 1030264-008-AO for printing and publishing facility at the Better Business Forms, Inc., Largo Plant (Standard Industrial Classification No. 2752). The facility is located in Pinellas County at 10950 Belcher Road South in Largo, Florida. The UTM coordinates are Zone 17, 328.08 km East, and 3084.02 km North.

This final permit is organized by the following sections:

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Due to 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.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

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 final permit. 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) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, [Agency.Clerk@dep.state.fl.us](mailto:Agency.Clerk@dep.state.fl.us), 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 final 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 is not available in this proceeding.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

  
Kelley M. Boatwright  
District Air Program Administrator  
Southwest District

03/20/2014  
Effective Date

### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) 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 persons listed below.

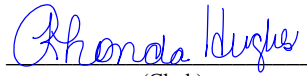
Mr. Mike Barrett, Better Business Forms, Inc. ([mbarrett@clondalkingroup.com](mailto:mbarrett@clondalkingroup.com))

Mr. Christopher G. Stirrat, P.E., Environmental Safety Consultants, Inc. ([escinc@verizon.net](mailto:escinc@verizon.net))

Mr. Sherrill Culliver, Pinellas County Air Quality Division ([sculliver@co.pinellas.fl.us](mailto:sculliver@co.pinellas.fl.us))

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)

3/20/2014  
(Date)

## SECTION 1. GENERAL INFORMATION (FINAL)

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### FACILITY AND PROJECT DESCRIPTION

#### Existing Facility

The Better Business Forms, Inc. Largo Plant is a printing and publishing facility. The existing facility consists of the following emissions unit (EU).

Facility ID No. 1030264	
EU ID No.	Emissions Unit Description
001	Printing Facility (Lithographic and Flexographic)

#### Project Description and Affected Emission Unit

The purpose of this project is to remove three existing presses: 2 lithographic web presses using UV-cured ink and one lithographic web press using soy-based ink from Emission Unit No. 001. This project will modify the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Printing Facility (Lithographic and Flexographic)

**NOTE:** Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

### FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no 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.
- This facility is a synthetic non-Title V source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The emission limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source. Exceeding the permitted limits for HAPs and/or VOCs (*see Specific Condition No. A.2.*) may subject the facility to the requirements of Title V permitting and 40 CFR 63, Subpart KK- National Emission Standard for Hazardous Air Pollutants for the Printing and Publishing Industry.

### PERMIT HISTORY/AFFECTED PERMITS

This permit revises and replaces Operation Permit No. 1030264-008-AO.

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## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection  
Southwest District Office  
Air Permitting Program  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to Pinellas County Air Quality Division. The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division  
509 East Avenue South, Suite 138  
Clearwater, Florida 33760  
Telephone: 727-464-4422

3. Appendices - The following Appendices are attached as part of this permit:

- a. Appendix A. Citation Formats and Glossary of Common Terms;
- b. Appendix B. General Conditions;
- c. Appendix C. Common Conditions; and
- d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

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

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.  
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.  
[Rule 62-210.370(3), F.A.C.]
8. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to the Pinellas County Air Quality Division (Compliance Authority) no later than 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the applicant shall submit the following:
- the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
  - the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and
  - copies of the most recent month of records/logs specified in Specific Condition No. A.4.
- [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

### SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

#### A. EU No. 001 Printing Facility (Lithographic and Flexographic)

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description																								
001	<p><u>Printing Facility (Lithographic and Flexographic)</u> – This emissions unit is a printing and publishing facility with the capability to print with flexographic inks, ultraviolet (UV) cured inks, graphic inks, and lithographic inks. The facility consists of 18 printing presses of the following types:</p> <table><tr><th>Printing Press Type</th><th>Ink Type</th><th>Number of Presses</th></tr><tr><td>Lithographic web press</td><td>UV-cured</td><td>7</td></tr><tr><td>Flexographic press</td><td>water-based</td><td>2</td></tr><tr><td>Flexographic press</td><td>UV-cured</td><td>4</td></tr><tr><td>Flexographic press w/ one UV station</td><td>water-based</td><td>2</td></tr><tr><td>Lithographic sheet fed press</td><td>UV-cured</td><td>1</td></tr><tr><td>Lithographic sheet fed press</td><td>soy-based</td><td>1</td></tr><tr><td>Silkscreen press</td><td>solvent or UV-cured</td><td>1</td></tr></table>	Printing Press Type	Ink Type	Number of Presses	Lithographic web press	UV-cured	7	Flexographic press	water-based	2	Flexographic press	UV-cured	4	Flexographic press w/ one UV station	water-based	2	Lithographic sheet fed press	UV-cured	1	Lithographic sheet fed press	soy-based	1	Silkscreen press	solvent or UV-cured	1
	Printing Press Type	Ink Type	Number of Presses																						
	Lithographic web press	UV-cured	7																						
	Flexographic press	water-based	2																						
	Flexographic press	UV-cured	4																						
	Flexographic press w/ one UV station	water-based	2																						
	Lithographic sheet fed press	UV-cured	1																						
	Lithographic sheet fed press	soy-based	1																						
	Silkscreen press	solvent or UV-cured	1																						
	<p>All emissions are fugitive and there are no stacks or vents on the presses. The UV Presses have a six color capability to print with either UV-cured inks or soy-based air-cured graphic inks. Volatile organic compound (VOC) and organic solvent (OS) emissions from all printing inks and clean-up operations are fugitive and uncontrolled (i.e., no control equipment). Ventilation hoods and associated exhaust stacks are used primarily to provide building ventilation and to remove the heat associated with the UV ink curing lamps.</p>																								

#### PERFORMANCE RESTRICTIONS

- A.1.** Restricted Operation - The hours of operation are not limited (8760 hours per year).  
[Rules 62-4.070(3) and 62-210.200 (“Potential to Emit”), F.A.C.]

#### EMISSIONS STANDARDS

- A.2.** Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emission Limitations - the following emission limits apply to all VOC and HAP containing materials used at the facility:

Pollutant	Facility-wide Emission Limits (tons per any consecutive 12-month period)
Total Volatile Organic Compounds (VOC)	49.0
Any Individual Hazardous Air Pollutant (HAP)	9.0
Total Hazardous Air Pollutants (HAP)	18.0

[Rule 62-210.200 (“Potential to Emit”), F.A.C.; Construction Permit No. 1030264-007-AC]

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## SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

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### A. EU No. 001 Printing Facility (Lithographic and Flexographic)

#### NOTIFICATION REQUIREMENTS

- A.3. Plant Malfunction** - If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Pinellas County Air Quality Division. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. For purposes of notification to the Pinellas County Air Quality Division, "immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays.  
[Rules 62-4.070(3) and 62-4.130, F.A.C.]

#### RECORDKEEPING REQUIREMENTS

- A.4. VOC and HAP Recordkeeping** - The permittee shall keep monthly logs to document compliance with the VOC and HAP limitations of Specific Condition No. A.2. The permittee shall record and calculate, at a minimum, the following:
- facility name, Facility ID No., Emission Unit ID No., source description, date (month, day, and year), and operator initials for each measurement;
  - name or identification number of each ink, coating, solvent, or other HAP/VOC containing material used during the month and the amount of each material used, in gallons;
  - HAP (individual and total) content and VOC content, in pounds per gallon for each material listed in A.4.b., above;
  - facility-wide HAP (individual and total) and VOC emissions for the most recent month, in tons per month; and
  - facility-wide HAP (individual and total) and VOC emissions for the most recent consecutive 12-month period, in tons per consecutive 12-month period.

Supporting documentation ("As Supplied" and "As Applied" sheets, Material Safety Data Sheets (MSDS), purchase orders, USEPA "VOC Data Sheets", etc.) shall be kept for each ink, coating, solvent and other material used in the printing operations which includes sufficient information to determine HAP and VOC emissions.

VOC content of materials may also be determined by using EPA Method 24 or 24A contained in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-297, F.A.C. New materials, or the same material supplied by a different manufacturer, shall be tested for VOC content using EPA Method 24, 24A, or the above-mentioned certification prior to use.

Should the permittee wish to claim credit for solvent disposed of as hazardous waste, the HAP and VOC content of the waste must also be determined. Documentation of solvents consumed, such as during cleanup, may use a mass balance method to determine usage (amount used minus amount collected for disposal or recycle).

Monthly records shall be completed by the tenth day of the following month. All records shall be retained on file at the facility for at least three (3) years and shall be made available to the Department and the Pinellas County Air Quality Division upon request.

[Rules 62-4.160(14)(b) and 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90; Construction Permit No. 1030264-007-AC]