

Printing Operations – General Permits

FACILITY: InterCo Print LLC Clearwater, FL Printing Plant		Per_ID: 1180	DISTRICT: Southwest
ADDRESS: 14549 62nd Street. North Clearwater, FL		CONTACT: Phone No: 727-638-0906	
ARMS No.: 1030441 001	PERMIT NO.: 1030441-012-AG	EXPIRATION DATE: 4/7/12 <i>Re-registration due on or before : 3/8/12</i>	
EMISSION UNIT DESCRIPTION: Three Cold-set, lithographic printing Lines: Press Line 1: 44-color Goss Community, Non-heatset Web Offset Unit, Press Line 2: A 20-Color DGM Non-heatset Web Offset Printing press; Press Line 3: A 4-color, UV DGM Non-heatset Web Printing Press			
INSPECTION DATE: January 28, 2010	ARMS INSPECTION TYPE: <input checked="" type="checkbox"/> INS2 or INS_____	COMPLIANCE STATUS: <input checked="" type="checkbox"/> IN <input type="checkbox"/> MNC <input type="checkbox"/> SNC	
Type of Inspection: <input checked="" type="checkbox"/> Initial <input type="checkbox"/> Re-inspection <input type="checkbox"/> Complaint <input type="checkbox"/> Drive-by <input type="checkbox"/> Quarterly			
A. General Review:			
1.	Permit File Review	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2.	Introduction and Entry	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<i>Comments: Mr. Kent answered my questions, provided the VOC Logs and gave me a tour of the production facility.</i>			
3.	Is the Authorized Representative still: <u>Bill Shoup</u> ?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<i>Comments:</i>			
4.	Is the facility contact still: Michael A. Kent?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<i>Comments:</i>			
I N C	M N C	S N C	B. Specific Conditions
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A facility comprising one (1) or more printing operations shall be eligible to use this air general permit provided it meets the general eligibility criteria of paragraph 62-210.310(2)(a), F.A.C., and the following specific criteria. a. The facility shall use no other air general permit. b. The facility shall not be subject to any unit-specific applicable requirement. [62-210.310(4)(f)1] <i>Comments: The facility has no other permit and it is not subject to any unit-specific applicable requirement.</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A facility using this air general permit shall comply with the following specific conditions, provided, however, that the facility shall comply with the limitations of either sub-subparagraphs 62-210.310(4)(f)2.a or b., F.A.C. The facility may change method of compliance between sub-subparagraphs 62-210.310(4)(f)2.a. and b., F.A.C., provided the owner or operator maintains records to demonstrate compliance with the appropriate requirement at the time of change and thereafter. a. The facility shall not emit eighty (80) tons or more of volatile organic compounds, eight (8) tons or more of any individual hazardous air pollutant, or twenty (20) tons or more of any combination of hazardous air pollutants in any consecutive twelve (12) months. The facility shall not rely upon add-on controls to meet these limitations. The owner or operator shall keep records of material usage and calculate, using a mass balance approach, for each calendar month and each consecutive twelve (12) months, the emissions of volatile organic compounds, individual hazardous air pollutants and total combined hazardous air pollutants. The owner or operator shall retain these records, available for Department inspection, for a period of at least five (5) years; or b. The facility shall use less than 1,333 gallons of materials containing any hazardous air pollutants and not exceed the following material usage limitations in any consecutive twelve (12) months. The owner or operator shall keep records of material usage for each calendar month and each consecutive twelve (12) months to demonstrate compliance with such limitations. The owner or operator shall retain these records, available for Department inspection, for a period of at least five (5) years. Specifically, the facility shall: (I) Operate only heatset offset lithographic printing lines and use less than 100,000 pounds of ink, cleaning solvent and fountain solution additives combined; (II) Operate only non-heatset offset lithographic printing lines and use less than 14,250 gallons of cleaning solvent and fountain solution additives combined;

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I N	M N C	S N C	B. Specific Conditions
			<p>(III) Operate only digital printing lines and use less than 12,100 gallons of solvent based inks, clean-up solutions and other solvent-containing materials combined;</p> <p>(IV) Operate only screen or letterpress printing lines and use less than 14,250 gallons of solvent based inks, clean-up solutions and other solvent-containing materials combined;</p> <p>(V) Operate only water-based or ultraviolet-cured- material flexographic or rotogravure printing lines and use less than 400,000 pounds of water-based inks, coatings and adhesives, combined;</p> <p>(VI) Operate only solvent-based material flexographic or rotogravure printing lines and use less than 100,000 pounds of inks, dilution solvents, coatings, cleaning solutions and adhesives, combined; or</p> <p>(VII) Operate any combination of heatset lithographic, non-heatset lithographic, digital, screen or letterpress, rotogravure or flexographic printing lines and use no more than the most stringent of the material usage limitations contained in sub-sub-paragraphs 62-210.310(4)(f)2.b.(I) through (VI), F.A.C., for the type of printing lines at the facility. For purposes of determining which limit is the most stringent, the pounds of materials used for heatset offset lithographic lines and flexographic lines shall be converted to the equivalent gallons by dividing by 8.5 pounds per gallon and shall be compared with the limits for non-heatset offset lithographic, digital, screen and letterpress lines, as applicable, for the type of printing lines at the facility. The most stringent limit shall apply to the total of all solvent-containing material used. [62-210.310(4)(f)2.]</p> <p><i>Comments: Inspection note: When using mass balance, emission factors may not be used. All VOC and HAP emissions are assumed as emitted. The facility decided to show compliance with record-keeping of the VOC emissions. Its spreadsheet calculates the emissions assuming 100 % emission of the VOCs and HAPS in the inks.</i></p> <p><i>The 12 month running cumulative total VOC emissions were at their highest at the end of the month of July 2008 to June 2009 with 9.56 tons of VOCS emitted. The 12 month running cumulative total HAPS emissions were at their highest at the end of the month of July 2009 to June 2009, also, with 0.39 tons of HAPS emitted.</i></p> <p><i>The records were available back to 2007.</i></p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The facility shall comply with the objectionable odor prohibition of subsection 62-296.320(2), F.A.C. [62-210.310(4)(f)2.c.]</p> <p><i>Comments: There were no objectionable odors inside or outside the building.</i></p>
I N	M N C	S N C	C. Selected General Conditions and Procedures
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Administrative Corrections. Within thirty (30) days of any minor changes requiring corrections to information contained in the registration form, the owner or operator shall notify the Department in writing. Such changes shall include:</p> <p>1. Any change in the name, address, or phone number of the facility or authorized representative not associated with a change in ownership or with a physical relocation of the facility or any emissions units or operations comprising the facility; or [62-210.310(2)(d), F.A.C.]</p> <p><i>Comments: I read the permit condition above to Mr. Kent and we discussed it briefly. Mr. Kent stated that he understood the requirement.</i></p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Equipment Changes. The owner or operator shall maintain records of all equipment changes. In the case of installation of new process or air pollution control equipment, alteration of existing process or control equipment without replacement, or replacement of existing process or control equipment with equipment substantially different in terms of capacity, method of operation, material processed, or intended use than that noted on the most recent registration form, the owner or operator shall submit a new and complete air general permit registration form for the facility with the appropriate fee pursuant to Rule 62-4.050, F.A.C. to the Department, provided, however, that any change that would constitute a new major stationary source, major modification, or modification that would be a major modification but for the provisions of paragraph 62-212.400(2)(a), F.A.C., shall require authorization by air</p>

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I N C	M N C	S N C	
			<p style="text-align: center;">C. Selected General Conditions and Procedures</p> <p>construction permit. [62-210.310(2)(e), F.A.C.]</p> <p><i>Comments: There were no equipment changes per Mr. Kent and none that I could see. I reminded Mr. Kent that if there were to be any changes, Interco should first notify the FDEP and PCDEM immediately and before making the changes.</i></p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>If, for any reason, the owner or operator of any facility operating under an air general permit does not comply with or will be unable to comply with any condition or limitation of the air general permit, the owner or operator shall immediately provide the Department with the following information:</p> <ol style="list-style-type: none"> 1. A description of and cause of noncompliance; and 2. 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. <p>[62-210.310(3)(i), F.A.C.]</p> <p><i>Comments: I read the permit condition above to Mr. Kent and we discussed it briefly. Mr. Kent stated that he understood the requirement to report non-compliance periods, causes, corrections to the same and time line for corrections to take place.</i></p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Valid Permit</p> <p>Use of an air general permit is not transferable and does not follow a change in ownership of the facility. Prior to any sale, other change of ownership, or permanent shutdown of the facility, the owner or operator is encouraged to notify the Department of the pending action. The new owner or operator who intends to continue using the air general permit for the facility shall re-register with the Department pursuant to subparagraph 62-210.310(2)(b)2., F.A.C.</p> <p>[62-210.310(3)(b), F.A.C.]</p> <p><i>Comments: I read the permit condition above to Mr. Kent and we discussed it briefly. Mr. Kent stated that he understood the requirement that the general permit is not transferable and does not follow a change in ownership of the facility.</i></p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Re-registration. Registration of a facility which is currently authorized to operate under the terms and conditions of an air general permit is classified as a re-registration. An owner or operator shall re-register the facility in the following cases:</p> <ol style="list-style-type: none"> a. Impending expiration of the term for air general permit use; b. Change of ownership of all or part of the facility; c. Proposed new construction, modification, or other equipment change that requires registration pursuant to paragraph 62-210.310(2)(e), F.A.C.; and d. Any other change not considered an administrative correction under paragraph 62-210.310(2)(d), F.A.C. <p>62-210.310(2)(b)2.</p> <p><i>Comments: I read the permit condition above to Mr. Kent and we discussed it briefly. Mr. Kent stated that he understood the requirement to re-register at least 30 days before the permit expired, in case of a change in ownership, or process & equipment modifications or new construction.</i></p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The owner or operator's use of an air general permit is limited to five (5) years. Prior to the end of the five (5) year term, the owner or operator who intends to continue using the air general permit for the facility shall re-register with the Department pursuant to subparagraph 62-210.310(2)(b)2., F.A.C. To avoid lapse of authority to operate, the owner or operator must submit the proper registration form and processing fee at least thirty (30) days prior to expiration of the facility's existing air general permit. The air general permit re-registration form shall contain all current information regarding the facility.</p> <p>[General Conditions - 62-210.310(3)(a), F.A.C.]</p> <p><i>Comments: The permit expires on 4/7/12. A new notification form is required to be submitted no later than 3/8/12. I read the former to Mr. Kent to remind him of the re-registration submittal due no later than 3/8/12.</i></p>

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D. Other:

Pollution Prevention Activities

➤ P2 Handouts Provided: P2 Brochure; P2 Manual; P2 Checklist

➤ Have any emissions reductions occurred Yes / No _____

Chemical Substitution; Equipment Changes; Process Changes

Chemical/Material Reuse; On-site Recycling; Other: _____

Comments: *The emissions reduction has come about as the result of less business. Interco now has 38 employees (down from 500 about 4 years ago)*

Closing Conference: I informed Mr. Kent that Interco was in compliance with applicable rules and permit conditions.

Other Comments: NA

Inspector(s): Jose Rodriguez, Pinellas County, Air Quality Division

Signature(s)

Date: 2 February 2010

ACCESS? _____, ARMs? _____

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