

Printing Operations – General Permits

FACILITY: AAA Printing, Inc. AAA Printing		Per_ID: 2284	DISTRICT: Southwest
ADDRESS: 6801 114th Avenue North Largo, FL		CONTACT: Phone No: 727-544-0767	
ARMS No.: 1030488	PERMIT NO.: 1030488-007-AG	EXPIRATION DATE: 11/25/12	
EMISSION UNIT DESCRIPTION: Lithographic Printing: Didde ML 8-color UV press; Harris M1000 heatset with TEC model 80 catalytic incinerator			
INSPECTION DATE: 2/13/08	ARMS INSPECTION TYPE: <input checked="" type="checkbox"/> INS2	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
3.	Is the Authorized Representative still: <u>Douglas Minkel</u> ?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
4.	Is the facility contact still: Douglas Minkel?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B. Specific Conditions			
I N C	M N C	S N C	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>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.</p> <p style="margin-left: 20px;">a. The facility shall use no other air general permit.</p> <p style="margin-left: 20px;">b. The facility shall not be subject to any unit-specific applicable requirement.</p> <p>[62-210.310(4)(f)1]</p> <p>Comments: <i>The facility meets the general eligibility criteria of 62-210.310(2)(a), F.A.C. and is eligible to use an air general permit.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>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.</p> <p style="margin-left: 20px;">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</p> <p style="margin-left: 20px;">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:</p> <p style="margin-left: 40px;">(I) Operate only heatset offset lithographic printing lines and use less than 100,000 pounds of ink, cleaning solvent and fountain solution additives combined;</p> <p style="margin-left: 40px;">(II) Operate only non-heatset offset lithographic printing lines and use less than 14,250 gallons of cleaning solvent and fountain solution additives combined;</p> <p style="margin-left: 40px;">(III) Operate only digital printing lines and use less than 12,100 gallons of solvent based inks, clean-up solutions</p>

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I N	M N C	S N C	B. Specific Conditions
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and other solvent-containing materials combined;

(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;

(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;

(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

(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.]

Comments: *Inspection note: When using mass balance, emission factors may not be used. All VOC and HAP emissions are assumed as emitted.*

AAA Printing uses sub-paragraph 62-210.310(4)(f)2.a.as their method of compliance

The records were available back to June 2007. The facility began operation in June 2007 and monthly records are kept up to date. The emissions after eight months of operations are as follows:

Pollutant	TPY(12 monthrolling average)	Limit(tons)(12 month rolling average)
VOC's	2.95	80
Total HAPs	0.07	20
Individual HAP(Diethylene Glycol Monobutyl Ether(112-34-5)	0.027	8

A copy of the records is attached to the inspection report.

<input checked="" 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>Comments: <i>: An odor survey was not conducted during the inspection but no objectionable odors were detected outside of the building prior to and after the inspection.</i></p>
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I N	M N C	S N C	C. Selected General Conditions and Procedures
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<input checked="" 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</p> <p>[62-210.310(2)(d), F.A.C.]</p> <p>Comments: <i>There are no administrative corrections.</i></p>
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I N	M N C	S N C	C. Selected General Conditions and Procedures
<input checked="" 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 construction permit. [62-210.310(2)(e), F.A.C.]</p> <p><i>Comments: There have not been any equipment changes to the facility. The equipment in the air general permit notification on file matches what is on-site.</i></p>
<input checked="" 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: There were no instances of previous non-compliance found during my inspection.</i></p>
<input checked="" 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. [62-210.310(3)(b), F.A.C.]</p>
<input checked="" 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>
<input checked="" 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. [General Conditions - 62-210.310(3)(a), F.A.C.]</p> <p><i>Comments: The permit expires on 11/25/12. A new notification form is required to be submitted no later than 10/25/12.</i></p>
			D. Other:

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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:

Closing Conference Yes No

Inspector(s): Adam Richardson, Pinellas County, Air Quality Division

Signature(s) _____ Date: 2/13/08

CONTACT LOG? _____, ACCESS? ___X___, ARMs? _X_____

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