

Printing Operations – General Permits

FACILITY: BIC Graphic USA Manufacturing Co., Inc. BIC Graphic USA (BIC 1; BIC 2; BIC 3)		Per_ID: 1072	DISTRICT: Southwest
ADDRESS: 14421 Myerlake Circle Clearwater, FL		CONTACT: Phone No: 727-560-4955	
ARMS No.: 1030494	PERMIT NO.: 1030494-004-AG	EXPIRATION DATE: 2/19/15	
EMISSION UNIT DESCRIPTION: Covers 3 buildings (BIC 1, BIC 2, & BIC 3). Manufacturing consists of injection molding, screen printing and screen cleaning			
INSPECTION DATE: 3 March 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 <i>Comments:</i>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2.	Introduction and Entry <i>Comments: Mr. Joe Dodge and his assistant Kim Chavarria answered my questions and provided the VOC Logs. Mr. Dodge escorted me during the tour of the manufacturing facilities in BIC 1, BIC 2, and BIC 3.</i>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3.	Is the Authorized Representative still: <u>Joe Dodge</u> ? <i>Comments:</i>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
4.	Is the facility contact still: Joe Dodge? <i>Comments:</i>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B. Specific Conditions			
<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><i>Comments: Mr. Dodge stated that this facility does not have any other air operating permits. There are no unit specific applicable requirements (rules) for the equipment at this facility.</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>

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IN	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-subparagraphs 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>Comments: <i>Inspection note: When using mass balance, emission factors may not be used. All VOC and HAP emissions are assumed as emitted.</i></p> <p><i>The records were available back to 2008 when the facility first became a General Permit Source. The facility opted to comply with “a.” above, keeping Mass Balance monthly records and 12 month consecutive running totals with the assumption that 100% of the VOCS were emitted and emitting less than 80 tons of VOCS in any 12 consecutive months, less than 8 tons of any individual HAP in 12 consecutive months and less than 20 tons of total HAPS in any 12 consecutive months. The highest 12 month rolling cumulative total VOCS emitted were recorded at the end of the month of July 2009 as 35.6 tons of VOCS. The highest 12 month rolling cumulative total HAPS emitted were recorded at the end of the month of July 2009 as 6.79 tons of HAPS. The single largest 12 month rolling cumulative total amount of an individual HAP was also recorded at the end of the month of July 2009 when 0.783 tons of Xylene were emitted.</i></p> <p><i>Note: on March 8th, 2010, I found a reference error in the spreadsheet for Xylene and called Mrs. Kim Chavarria to point it out, so she could make the necessary correction at BIC. I was easily able to fix the reference for the total 12 month running cumulative HAPS content on the electronic spreadsheet which I was provided. The reference correction did not impact the compliance status. The facility remained in-compliance. I performed a quality check of the rest of the spreadsheet and there appeared to be no more errors. However, I also asked Mrs. Chavarria to perform a quality scan on the rest of the spreadsheet. In looking at the numbers, it seems obvious that if there are any changes, they won’t have an impact on compliance with VOC the limitation. If any corrections need to be made later, I will make the changes. I have put a flag in my calendar to ask Mrs. Chavarria for a follow-up, in 2 weeks.</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>Comments: <i>There were no VOC odors inside or outside the production facilities at BIC 1, BIC 2 or BIC 3.</i></p>
IN	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</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>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: Mr. Dodge informed me that BIC Graphics has plans to exchange manufacturing equipment with its South Carolina Plant. The exchange would have BIC sending some of its equipment to South Carolina and South Carolina sending some of its equipment to Clearwater. At this moment, these are just plans, however. Mr. Dodge was interested in having to submit only one re-registration when the exchange was complete. <u>He added that in speaking to the GP section in Tallahassee, he was given “verbal assurances” that he could bring the equipment to Clearwater in phases, install it in phases over a 4- 5 month period and then submit only one re-registration.</u> I advised Mr. Dodge that BIC Graphics should get any such assurances in writing from the FDEP before installing any equipment without an intervening re-registration form.</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 construction permit. [62-210.310(2)(e), F.A.C.]</p> <p><i>Comments: Mr. Dodge informed me that BIC Graphics has plans to exchange manufacturing equipment with its South Carolina Plant. The exchange would have BIC sending some of its equipment to South Carolina and South Carolina sending some of its equipment to Clearwater. At this moment, these are just plans, however. Mr. Dodge was interested in having to submit only one re-registration when the exchange was complete. <u>He added that in speaking to the GP section in Tallahassee, he was given “verbal assurances” that he could bring the equipment to Clearwater in phases, install it in phases over a 4- 5 month period and then submit only one re-registration.</u> I advised Mr. Dodge that BIC Graphics should get any such assurances in writing from the FDEP before installing any equipment without an intervening re-registration form. There were no changes at the time of my inspection.</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: There were no cases of non-compliance per Mr. Dodge.</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. [62-210.310(3)(b), F.A.C.]</p> <p><i>Comments: There has not been any change in ownership of the facility, nor has it shut down.</i></p>

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C. Selected General Conditions and Procedures			
<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> <p>a. Impending expiration of the term for air general permit use;</p> <p>b. Change of ownership of all or part of the facility;</p> <p>c. Proposed new construction, modification, or other equipment change that requires registration pursuant to paragraph 62-210.310(2)(e), F.A.C.; and</p> <p>d. Any other change not considered an administrative correction under paragraph 62-210.310(2)(d), F.A.C. 62-210.310(2)(b)2.</p> <p><i>Comments: The permit doesn't expire until 2015. There is no change in ownership. However there is a pending "swap" of equipment with the BIC South Carolina Plant regarding which I advised Mr. Dodge. (see comments under equipment changes)</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. [General Conditions - 62-210.310(3)(a), F.A.C.]</p> <p><i>Comments: The permit expires on 2/19/15. A new notification form is required to be submitted no later than 1/20/15.</i></p>

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: NA

Closing Conference: *I informed Mr. Dodge that BIC was in compliance with applicable rules and permit conditions.* Yes No

Other Comments: NA

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

Signature(s)

Date: 8 March 2010

CONTACT LOG? _____, **ACCESS?** _____, **GPCI?** _____

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