



# PRINTING OPERATIONS



## COMPLIANCE INSPECTION CHECKLIST

**INSPECTION TYPE:** ANNUAL (INS1, INS2)  COMPLAINT/DISCOVERY (CI)   
 RE-INSPECTION (FUI)  ARMS COMPLAINT NO:

**AIRS ID#:** 0330281 **DATE:** 2/8/08 **ARRIVE:** 1:45 PM **DEPART:** 2:40 PM  
**FACILITY NAME:** PENSACOLA NEWS JOURNAL  
**FACILITY LOCATION:** 101 EAST ROMANA STREET  
 PENSACOLA 32502-5652  
**OWNER/AUTHORIZED REPRESENTATIVE:** Patrick T. Daugherty **PHONE:** (850)435-8506  
**CONTACT NAME:** Patrick T. Daugherty **PHONE:** (850)435-8626  
**ENTITLEMENT PERIOD:** 6/28/2007 / 6/28/2012  
 (effective date) (end date)

**PART I: INSPECTION COMPLIANCE STATUS** (check  only one box)  
 IN COMPLIANCE  MINOR Non-COMPLIANCE  SIGNIFICANT Non-COMPLIANCE

**PART II: ELIGIBILITY REQUIREMENTS – Rule 62-210.300, F.A.C.**  
 (check  appropriate box(es))

**CATEGORICAL & CONDITIONAL EXEMPTION CRITERIA – Rule 62-210.300 (3) (a) 37., F.A.C.**

- Is the facility subject to any unit-specific applicable requirement?;-----  Yes  No  N/A
- Does the facility use less than 667 gallons of materials containing any hazardous air pollutants (HAPS) In any consecutive twelve (12) months?;-----  Yes  No

and,

- Does the facility operate:
  - ...only **heatset offset lithographic printing** lines and use less than 20,000 pounds combined, of ink, cleaning solvent & fountain solution additives in any consecutive twelve (12) months?;-----  Yes  No  N/A
  - ...only **non-heatset offset lithographic printing** lines and use less than 2,850 gallons, combined, of cleaning solvent and fountain solution additives in any consecutive twelve (12) months?;  Yes  No  N/A
  - ...only **digital printing** lines and use less than 2,425 gallons, combined, of solvent based inks, Clean-up solutions and other solvent-containing materials in any consecutive twelve (12) months?;-----  Yes  No  N/A
  - ...only **screen** or **letterpress printing** lines and use less than 2,850 gallons combined of solvent based inks, clean-up solutions and other solvent-containing materials in any consecutive twelve (12) months?;-----  Yes  No  N/A
  - ...only **water-based or ultraviolet-cured-material flexographic or rotogravure printing** lines and use less than 80,000 pounds, combined, of water-based inks, coatings, and adhesives in any consecutive twelve (12) months?; or-----  Yes  No  N/A
  - ...only **solvent-based material flexographic or rotogravure printing** lines and use less than 20,000 pounds, combined, of inks, dilution solvents, coatings, cleaning solutions, and adhesives in any consecutive twelve (12) months?-----  Yes  No  N/A

**PART II: ELIGIBILITY REQUIREMENTS – Rule 62-210.300, F.A.C. (continued)**  
 (check  appropriate box(es))

**GENERIC EMISSIONS UNIT EXEMPTION CRITERIA – Rule 62-210.300 (3) (b)1., F.A.C.**

- 1. Is the facility subject to any unit-specific applicable requirement?-----  Yes  No  N/A
- 2. Does this facility emit or have the potential to emit:
  - (i) 500 pounds per year or more of lead and lead compounds expressed as lead?-----  Yes  No  N/A
  - (ii) 1000 pounds per year or more of any hazardous air pollutant?-----  Yes  No  N/A
  - (iii) 2,500 pounds per year or more of total hazardous air pollutants?; or-----  Yes  No  N/A
  - (iv) 5.0 tons per year or more of any other regulated pollutant?-----  Yes  No  N/A

**GENERIC FACILITY EXEMPTION CRITERIA – Rule 62-210.300 (3) (b)2., F.A.C.**

- 1. Is the facility subject to any unit-specific applicable requirement?-----  Yes  No  N/A
- 2. Does this facility emit or have the potential to emit:
  - (i) 1000 pounds per year or more of lead and lead compounds expressed as lead?-----  Yes  No  N/A
  - (ii) 1.0 ton per year or more of any hazardous air pollutant?-----  Yes  No  N/A
  - (iii) 2.5 tons per year or more of total hazardous air pollutants?-----  Yes  No  N/A
  - (iv) 25 tons per year or more of carbon monoxide, nitrogen oxides and sulfur dioxide?; or-----  Yes  No  N/A
  - (v) 10 tons per year or more of any other regulated pollutant?-----  Yes  No  N/A

**PART III: AIR GENERAL PERMITS – Rule 62-210.310, F.A.C.**

(check  appropriate box(es))

**GENERAL PROCEDURES – Determination of Eligibility – Rule 62-210.310(2)(a)1. and 2., F.A.C.**

- 1. Does this facility emit or have the potential to emit:
  - a) ten (10) tons per year or more of any hazardous air pollutant?-----  Yes  No  N/A
  - b) twenty-five (25) tons per year or more of any combination of hazardous air pollutants?; or-----  Yes  No  N/A
  - c) one hundred (100) tons per year or more of any other regulated air pollutant?-----  Yes  No  N/A
- 2. Has this facility:
  - a) been collocated with, or relocated to such a facility as described in question #1. a), b), or c) above?;-----  Yes  No  N/A
  - b) created such a facility in combination with any other collocated facilities, emission units, or pollutant-emitting activities, including any such facility, emission unit, or activity that is otherwise exempt from air permitting?-----  Yes  No  N/A
- 3. Does this facility contain:
  - a) any emission units or activities not covered by the applicable air general permit with the exception of units and activities that are exempt from permitting pursuant to subsection Rule 62-210.300(3), F.A.C., or Rule 62-4.040, F.A.C.?;-----  Yes  No  N/A
  - b) any emission units or activities authorized by another air general permit where such other air general permit and the air general permit of interest specifically allow the use of one another at the same facility?-----  Yes  No  N/A

**GENERAL PROCEDURES – Initial Registration/Re-registration – Rule 62-210.310(2)(b), F.A.C.**

- 1. Has the owner or operator of this facility completed and submitted the proper registration form to the Department for the specific air general permit to be used?;-----  Yes  No  N/A
- 2. Does this facility have a current valid air general permit (entitlement to operate)?;-----  Yes  No  N/A
- 3. Has there been a change of ownership of all or part of the facility?;-----  Yes  No  N/A
- 4. Have there been any new administrative, construction, modification, or equipment changes that require a re-registration?-----  Yes  No  N/A

**PART III: AIR GENERAL PERMITS – Rule 62-210.310, F.A.C. (continued)**

(check  appropriate box(es))

**GENERAL CONDITIONS – Rule 62-210.310(3), F.A.C.**

- 1. Does the air general permit registration form contain all current information regarding the facility?;-----  Yes  No  N/A
- 2. Has the owner or operator allowed the circumvention of any air pollution control device, or allowed the emission of air pollutants without the proper operation of all applicable air pollution control devices?;-----  Yes  No  N/A
- 3. Does the owner or operator:
  - a) maintain the authorized facility in good condition?;-----  Yes  No  N/A
  - b) ensure that the facility maintains its eligibility to use the air general permit and complies with all

- terms and conditions of the air general permit?;-----  Yes  No  N/A
4. Has the owner or operator allowed you, as the duly authorized representative of the Department, access to the facility at reasonable times to inspect and test and to determine compliance with the air general permit and Department rules?-----  Yes  No  N/A

**PART IV: SPECIFIC CONTROL/OPERATING/RECORDKEEPING CRITERIA – Rule 62-210.310(4)(f), F.A.C.**

(check  appropriate box(es))

**SPECIFIC CONDITIONAL EXEMPTION REQUIREMENTS FROM TITLE V AIR PERMITTING**

1. Does the facility have any other air general permits?;-----  Yes  No  N/A
2. Is this printing operation subject to any unit-specific applicable requirement?;-----  Yes  No  N/A

*Answer questions 3. a), b), & c), and 4. below if the facility uses the **mass balance approach** to calculate emissions. If the **materials usage limitation approach** is used, skip questions 3. and 4. below and proceed to question 5.*

**Mass Balance Approach**

3. Does the facility emit:
- a) ...eighty (80) tons or more of VOC's?;-----  Yes  No  N/A
- b) ...eight (8) tons or more of any individual HAP?;-----  Yes  No  N/A
- c) ...or twenty (20) tons or more of any combination of HAP's in any consecutive twelve (12) months?;-----  Yes  No  N/A
4. Does the facility rely upon add-on controls to meet any of the above limitations in a), b), or c)?;  Yes  No  N/A

**Materials Usage Limitation Approach**

5. In any consecutive twelve (12) months, does the facility use less than:
- a) ...thirteen hundred and thirty-three (1,333) gallons of materials containing hazardous air pollutants (HAP's)?;-----  Yes  No  N/A

**and** (choose only one category below, I thru VI, or VII).

- I. ...Operate only **heatset offset lithographic printing** lines and use less than 100,000 pounds of ink, cleaning solvent, and fountain solution additives combined?;-----  Yes  No  N/A
- II. ...Operate only **non-heatset offset lithographic printing** lines and use less than 14,250 gallons of cleaning solvent and fountain solution additives combined?;-----  Yes  No  N/A
- 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?;-----  Yes  No  N/A
- 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?;-----  Yes  No  N/A

**PART IV: SPECIFIC CONTROL/OPERATING/RECORDKEEPING CRITERIA – Rule 62-210.310(4)(f), F.A.C.**

(check  appropriate box(es))

**SPECIFIC CONDITIONAL EXEMPTION REQUIREMENTS FROM TITLE V AIR PERMITTING (continued)**

- 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?;  Yes  No  N/A
- 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?;-----  Yes  No  N/A
- 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-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?;-----  Yes  No  N/A

(Refer to the chart & information below to identify the Printing Process combination(s) and to determine the most stringent limit for the combination(s) chosen.)

<u>PRINTING PROCESS</u>		<u>INDIVIDUAL PROCESS LIMITS (IPL)</u>	<u>STRINGENT LIMITS FOR COMBINATIONS (SLC)</u> (SLC = IPL* ÷ 8.5 lbs/gal.**)
#1	Heatset Offset Lithographic	100,000 lbs.*	11,765 gals.**
#2	Non-heatset Offset Lithographic	14,250 gals.	14,250 gals
#3	Digital	12,100 gals.	12,100 gals.
#4	Screen or Letterpress	14,250 gals.	14,250 gals
#5	Water-based or UV cured Rotogravure or Flexographic	400,000 lbs.*	47,059 gals.**
#6	Solvent-based Rotogravure or Flexographic	100,000 lbs*	11,765 gals**

(*Example: If you were a printer and your combination printing processes included both **Printing Process** numbers **two (2)** and **five (5)**, then the most stringent limit shall apply to the total of all solvent-containing material used. In this example, the individual **Stringent Limit for Combinations (SLC)** for each process is **14,250 gals.** and **47,059 gals.**, respectively. Therefore, the most stringent limit for this combination would be **14, 250 gals.**)*

6. Does the facility 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.)-----  Yes  No  N/A

Carol Melton

2/11/08

\_\_\_\_\_  
Inspector's Name (Please Print)

\_\_\_\_\_  
Date of Inspection

/s/

\_\_\_\_\_  
Inspector's Signature

\_\_\_\_\_  
Approximate Date of Next Inspection

**COMMENTS:** Upon my arrival, Mr. Willie Tyson, Maintenance, was asked to take me to the press manager's office. However, the Press Manager, Dave Alcock could not be found. Per my request, Mr. Tyson directed me to the office of Patrick Daugherty, Print and Distribution Director. After several minutes, Mr. Daugherty and Martin Calhoun, Technology Director, arrived. They indicated that they did not know that a general permit had been registered for the facility. Mr. Daugherty indicated that they must have a copy but he did not know where it would be. I showed them a copy of the general permit. Together we discussed and reviewed the contents of the permit, the data given on the application form, and the record keeping requirements. I emphasized the material usage record keeping requirements on page 4 of the permit and asked if such records had been maintained. They indicated they did not know, and needed some time to determine if such records had been maintained. I explained that since the authorized representative noted in the application, Richard Ottensmeyer, no longer works for the company, they need to notify us of a new authorized representative. I explained that they appeared to be out of compliance with their permit, and they should take steps to get back into compliance. They made a copy of my field copy of the general permit. I told them that we would send them a letter noting our findings and that it might be a warning letter requesting a meeting to determine if violations had occurred. They indicated they understood and would contact their environmental person at headquarters to help determine how they can get into compliance.