

PRINTING OPERATIONS INFORMATIONAL HANDOUT



❖ What is the Purpose of the Air General Permit Registration Program?

- The Department of Environmental Protection (DEP) has established an Air General Permit (AGP) under Rule 62-210.310(4)(f), Florida Administrative Code, (F.A.C.), for Printing Operations. By simply registering to “use” the AGP, the owner or operator of an eligible facility is allowed to construct and operate the facility under the terms and conditions of the AGP rule. There is no need for the owner or operator to incur the additional time and expense of applying for an individual air construction or air operation permit.

❖ Who is Eligible to use a Printing Operations AGP?

- The owner or operator of a proposed new or existing facility shall determine the facility’s eligibility to use the Air General Permit.
- To be eligible for the Printing Operations AG permit, facilities shall use either the mass balance approach, or the material usage approach method to demonstrate compliance with Rule 62-210.310(4)(f)2., F.A.C.
 - a) **Mass Balance Approach:** The facility shall not emit eighty (80) tons or more of volatile organic compounds (VOCs), eight (8) tons or more of any hazardous air pollutant (HAP), or twenty (20) tons or more of any combination of HAPs in any consecutive twelve (12) month period. **The facility shall not rely upon add-on controls to meet these limitations.** The owner/operator or authorized representative shall keep records of material usage and calculations of HAPs and VOCs using a mass balance approach, for each calendar month and each consecutive twelve (12) months, the emissions of VOCs, individual HAPs and total combined HAPs: *or,*

b) **Material Usage Approach**: The facility shall use less than one thousand three hundred thirty-three (1,333) gallons of materials containing any HAP and not exceed the following material usage limitations in any consecutive twelve (12) months. Specifically, the facility shall:

- (1) operate only **heatset offset lithographic printing** lines and use less than one hundred thousand (100,000) pounds combined, of inks, cleaning solvents, fountain solution concentrate, and fountain solution additives;
- (2) operate only **non-heatset offset lithographic printing** lines and use less than fourteen thousand, two hundred-fifty (14,250) gallons combined, of cleaning solvents, fountain solution concentrate, and fountain solution additives;
- (3) operate only **digital printing** lines and use less than twelve thousand, one hundred (12,100) gallons combined, of solvent based inks, clean-up solutions and other solvent containing materials;
- (4) operate only **screen** or **letterpress printing** lines and use less than fourteen thousand, two hundred-fifty (14,250) gallons combined, of solvent based inks, clean-up solutions and other solvent containing materials;
- (5) operate only **water-based** or **ultra-violet-cured-material flexographic** or **rotogravure printing** lines and use less than four hundred thousand (400,000) pounds combined, of water-based inks, coatings and adhesives;
- (6) operate only **solvent-based material flexographic** or **rotogravure printing** lines and use less than one hundred thousand (100,000) pounds combined, of inks, dilution solvents, coatings, cleaning solutions and adhesives; or,
- (7) 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 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 eight and one-half (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 material used.

- Eligible facilities must not operate any other emission units that would require an AO permit.
- Existing facilities with an AO permit may renew that permit or apply for the AG permit at least 30 days prior to the expiration date of the existing permit.

(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</u>	<u>STRINGENT LIMITS FOR COMBINATIONS</u>
#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.**)*

❖ **How Do I Register or Re-register for a Printing Operation AGP?**

- To register, the owner/operator of an existing or new printing operations facility may:
 - Use the Department’s online Air General Permit Electronic Registration System (AGPERS) found at <https://floridadep.gov/air/permitting-compliance/content/air-general-permits>; or
 - Download and complete the printing operation registration worksheet found at <https://floridadep.gov/air/permitting-compliance/content/printing-operations> and mail it to the Department at the address indicated in the worksheet instructions along with a \$100 registration processing fee.

- The registration and associated processing fee must be submitted to the Department at least thirty (30) days prior to the expiration date of an existing facility's authorization.
- For a new facility, the registration must be submitted at least thirty (30) days before intending to use the AGP rule authority.
- If certain changes occur at an existing printing operation facility, the owner/operator must re-register for use of the AGP. Re-registration of the AGP is required for the following changes:
 - Change of ownership
 - The new owner/operator must submit a registration along with a fee of \$100.00, at least thirty (30) days before intending to use the AGP rule authority.
 - The current owner operator is encouraged to notify the Department prior to the sale of the facility.
 - Physical change in location
 - Proposed new construction
 - Modifications to equipment (installation of new process or air pollution equipment; alteration of existing process or control equipment; 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 in the most recent registration form)

❖ **What is required by the Printing Operation AGP Rule?**

General Requirements

- This AG permit is valid only for the specific activity indicated. Any deviation from the specified activity and the conditions for undertaking that activity shall constitute a violation of the permit.
- The facility must not emit objectionable odors.
- Use of the AG does not eliminate the necessity for the owner/operator or authorized representative to obtain any other federal, state, or local permits that may be required, or relieve the owner/operator or authorized representative from the duty to comply with any federal, state, or local requirements that may apply.

☑ Record-keeping

- The owner/operator or authorized representative shall maintain records of materials used, and calculate actual HAP and VOC emissions (the emissions of VOCs, individual HAPs and total combined HAPs) for each calendar month and each consecutive twelve months using the **mass balance approach**; *or* by using the **material usage approach** for each calendar month and each consecutive twelve (12) months.
- The facility shall use less than one thousand, three hundred thirty-three (1,333) gallons of materials containing any HAP and not exceed the material usage limitations provided in Rule 62-210.310(4)(f)2.(b).(I) through (VII), F.A.C., in any consecutive twelve months.
- The owner/operator or authorized representative shall retain these records, available for Department inspection, for a period of at least five years. For assistance with the record-keeping and calculations requirements, a Printer's Compliance Calendar tool is available through the SBEAP office.

☑ Equipment Maintenance

- All Printing Operations units shall be maintained in proper working order in accordance with the manufacturer's specifications to ensure the integrity and efficiency of the equipment.
- If a printing operations unit contains a defect that affects the integrity or efficiency of the unit, the unit shall be taken out of service. The unit shall not be operated until it has been repaired or adjusted.
- A written plan containing operating procedures for startup, shutdown and malfunction shall be maintained and followed during those events.

❖ Who do I contact regarding questions about AGPs and/or registration procedures?

- Please contact the Department's Small Business Environmental Assistance Program by phone at 1-800-722-7457 or by email at Small.Business@dep.state.fl.us.

DISCLAIMER: This handout is for guidance purposes only. It is not official rule language and does not include a comprehensive listing of all environmental regulations that may be applicable

to Printing Operations. Please refer to Rule 62-210.310(4)(f) for complete and up-to-date rule language.