

# 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?

- This AGP is for a facility comprising one (1) or more printing operations.
- The facility must meet the general conditions for all air general permits and the specific conditions for Printing Operations in Rule 62-210.310 F.A.C.
- Eligible facilities must not operate any other emission units that would require an Air Operation (AO) permit.
- Eligible 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.

## How Do I Register or Re-register for a Printing Operations AGP?

- To register, you may use the Department’s online Air General Permit Electronic Registration Submittal system, <https://www.fldepportal.com/DepPortal/go/apply-operate-airfacility>, or complete a fillable registration worksheet and mail it to the Department at the address indicated in the worksheet instructions along with the \$100.00 processing fee payable to FDEP. The registration worksheet and additional information is available online, <https://floridadep.gov/air/permitting-compliance/content/printing-operations>.

- To avoid lapse of authority to operate, an owner or operator intending to use, or continue to use, an air general permit must submit the proper registration and processing fee at least thirty (30) days prior to expiration of the facility's existing air operation permit or air general permit.
- The owner or operator of an existing facility with an air general permit must re-register to use the air general permit in the following cases: impending expiration of the term for air general permit use; change of ownership of all or part of the facility; proposed new construction, modification, or other equipment change that requires registration and any other change not considered an administrative correction.
- 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 must re-register.
- Equipment changes. In the case of installation of new equipment, alteration of existing equipment without replacement, or replacement of existing equipment with equipment that is substantially different in terms of capacity, control efficiency, method of operation, material processed, or intended use than that noted on the most recent registration, the owner or operator must submit a new and complete air general permit registration with the appropriate fee to the Department at least thirty (30) days prior to the change.

## What is required by the Printing Operations AGP Rule?

### General Conditions

- The facility as a whole must not emit nor have the potential to emit ten (10) tons per year or more of any hazardous air pollutant, twenty-five (25) tons per year or more of any combination of hazardous air pollutants, or one hundred (100) tons per year or more of any other regulated air pollutant.
- The 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 shall re-register.
- The air general permit is valid only for the specific type of facility and associated emissions units and pollutant-emitting activities indicated.

- Use of the air general permit does not eliminate the necessity for the owner or operator to obtain any other federal, state or local permits that may be required, or relieve the owner or operator from the duty to comply with any federal, state or local requirements that may apply.

### Specific Conditions

- Facilities using this AGP shall use either the mass balance approach or the material usage approach method to demonstrate compliance.
  - **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,
  - **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:
    - 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;
    - 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;
    - 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;
    - 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;
    - 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;

- 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,
- 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.

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.

Number	PRINTING PROCESS	INDIVIDUAL PROCESS LIMITS	TRINGENT LIMITS FOR COMBINATIONS
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.**)

## Test Methods and Procedures

- Facilities in Broward, Duval County/City of Jacksonville, Hillsborough, Miami-Dade, Orange, Palm Beach, Pinellas, and Sarasota counties may have additional requirements and frequency of testing for performance tests. The owner or operator located in those counties is responsible for contacting the local program to comply with local requirements.

## Record-keeping

- The owner or operator 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 or operator 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

The owner or operator must maintain and operate the authorized facility consistent with manufacturer recommendations and good air pollution control practices necessary to achieve compliance. Throughout the term of air general permit use, the owner or operator must 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.

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](mailto:Small.Business@dep.state.fl.us).
- Facilities in **Broward, Duval County/City of Jacksonville, Hillsborough, Miami-Dade, Orange, Palm Beach, Pinellas, and Sarasota** counties may have additional requirements. Contact those

local programs directly for their specific rules, <https://floridadep.gov/air/air-director/content/local-program-air-contacts>.

*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), F.A.C., for complete and up-to-date rule language.*