



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Building
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

June 6, 2006

Mr. Mark Neumann, C.F.E., ASA, Director
Personal Property Division
Department of Property Appraisal
111 NW 1st Street, Suite 710
Miami, Florida 33128-1984

Re: St Ives, Inc., Avanti

Dear Mr. Neumann:

I have reviewed the material attached to your letters of May 31, 2006, including the Air Construction Permits for St. Ives Avanti. The material provided is sufficient to demonstrate that the Catalytic Oxidizer is pollution control equipment that is "primarily for the purpose of pollution control" and is eligible for assessment as pollution control devices pursuant to §193.621, Florida Statutes.

If there are any questions on this determination, please contact me at (850) 245-8002.

Sincerely,

Hamilton S. Owen
Hamilton S. Owen, P.E.



Ad Vg1
DEPARTMENT OF
ENVIRONMENTAL PROTECTION

JUN 05 2006

SITING COORDINATION

Property Appraisal
Personal Property Division
111 NW 1st Street • Suite 710
Miami, Florida 33128-1984
T 305-375-4070 F 305-375-3024

miamidade.gov

May 31, 2006

Hamilton S. Oven, P.E.
Administrator, Siting
Coordination Section
Marjory Stoneman Douglas Building
3900 Commonwealth Blvd
Tallahassee, FL 32399-3000

Re: St. Ives Inc., Avanti

Dear Mr. Oven:

I am forwarding to you a copy of the information sent to us for a Catalytic Oxidizer to be considered for pollution classification.

Please review and advise us whether or not you believe this system is entitled to the pollution classification . Thank you for your time.

Sincerely,

A handwritten signature in black ink that reads "Mark Neumann".

Mark Neumann, CFE., ASA
Division Director

MN/mh

Delivering Excellence Every Day

MIAMI-DADE COUNTY, FLORIDA

MIAMI-DADE

ENVIRONMENTAL RESOURCES MANAGEMENT
AIR QUALITY MANAGEMENT DIVISION
33 S.W. 2nd AVENUE
SUITE 900
MIAMI, FLORIDA 33130-1540
TELEPHONE: (305) 372-6925
FAX: (305) 372-6954

August 18, 2004

CERTIFIED MAIL No: 7000 0600 0025 3505 0331
RETURNED RECEIPT REQUESTED

NOTICE OF PERMIT

In the Matter of an
Application for Permit by:

Ms. Jeanne M. Caruana
Executive VP, CFO
St. Ives Avanti
13449 NW 42 Avenue
Miami, FL 33054

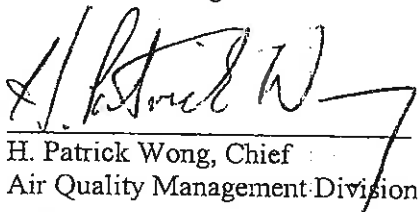
Permit No.: 0250479-003-AC
St. Ives Avanti
Effective Date: August 18, 2004
Expiration Date: August 17, 2005

Dear Ms. Caruana:

Enclosed is Air Construction Permit Number 0250479-003-AC for the St. Ives Avanti facility located at 13449 NW 42 Avenue, Miami, Miami-Dade County, issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Miami-Dade County, Florida.
Department of Environmental
Resources Management


H. Patrick Wong, Chief
Air Quality Management Division

CERTIFICATE OF SERVICE

The undersigned duly designated clerk hereby certifies that this NOTICE OF PERMIT (including the Construction Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 8/18/04 to the person(s) listed or as otherwise noted:

Jeanne Caruana*

Tom Tittle, Florida Department of Environmental Protection, Southeast District Office
James T. Show, P.E., Grove Scientific & Engineering Company, 6140 Edgewater Drive Suite F, Orlando,
FL 32810

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on
this date, pursuant to Section 120.52(7), Florida Statutes,
with the designated agency Clerk, receipt of which is
hereby acknowledged.

Chloe A. Saly 8/18/04
(Clerk) (Date)

Final Construction Permit Determination

I. Public Notice.

An "INTENT TO ISSUE AIR CONSTRUCTION PERMIT" to Ms. Jeanne Caruana, for the St. Ives Avanti facility located at 13449 NW 42 Avenue, Miami, Florida was clerked on July 26, 2004. The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was published in the Miami Daily Business Review on August 3, 2004. The Draft Air Construction Permit was available for public inspection at the DERM, Air Facilities Section in Miami. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was received on August 10, 2004.

II. Public Comment(s).

No comments were received during the 14-day (fourteen) public comment period.

III. Conclusion.

Since there were no comments received during the public comment period, no changes were made to the Draft Air Construction Permit and the DERM hereby issues the Air Construction Permit No.: 0250479-003-AC.

MIAMI-DADE COUNTY, FLORIDA

MIAMI-DADE



ENVIRONMENTAL RESOURCES MANAGEMENT
AIR QUALITY MANAGEMENT DIVISION
33 S.W. 2nd AVENUE
SUITE 900
MIAMI, FLORIDA 33130-1540
TELEPHONE: (305) 372-6925
FAX: (305) 372-6954

July 26, 2004

CERTIFIED MAIL: 7000 0520 0017 9400 1080
RETURN RECEIPT REQUESTED

In the Matter of an Application for Permit by:

ISSUED TO:

Ms. Jeanne M. Caruana
Executive VP, CFO
St. Ives Avanti
13449 NW 42 Avenue
Miami, FL 33054

Permit Number: 0250479-003-AC
Project: Air Construction Permit to modify conditions
in Construction Permit AC-13-215233 and to
add a RTO to the facility.

INTENT TO ISSUE

Dear Ms. Caruana:

The Miami-Dade County Department of Environmental Resources Management (DERM) gives notice of its intent to issue an **Air Construction Permit** for the proposed project as detailed in the application specified above, for the reasons stated below. A copy of the draft permit is attached.

The Florida Department of Environmental Protection (FDEP) has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the FDEP recognizes the DERM as the approved local air pollution control program of Miami-Dade County. Through a Specific Operating Agreement, the FDEP delegated to the DERM the authority to issue or deny permits for this type of air pollution source located in Miami-Dade County.

The applicant, Ms. Jeanne M. Caruana, Executive Vice President, CFO of St. Ives Avanti, applied on March 23, 2004 to DERM for a permit to replace two existing catalytic oxidizers with a single regenerative thermal oxidizer (RTO). This project is also to modify certain emissions limits established in Permit No. AC-13-215233. Based on the information provided in the application the potential emissions with the RTO operating at 99% efficiency are 34.64 TPY of Volatile Organic Compounds (VOCs) from the facility operating 8760 hours. The facility is located at 13449 NW 42 Avenue, Miami, Florida, 33054.

The DERM has permitting jurisdiction under **Section 403.087, Florida Statutes (F.S.)**, to issue or deny permits for air pollution sources. The project is not exempt from permitting procedures. The DERM has determined that an air pollution construction permit is required for the proposed work, and that the applicant's request for such a permit is acceptable.

The DERM intends to issue this permit based on Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297, and the belief reasonable assurances have been provided to indicate the proposed project will not adversely impact air quality, and that the specific conditions in the draft permit limit the potential emissions of air pollutants to the amounts described above.

7. A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the DERM to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the final action may be different from the position taken in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the DERM on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A person whose substantial interests are affected by the DERM's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the FDEP and the DERM a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:

1. The name, addresses, and telephone number of the person requesting mediation and that person's representative, if any;
2. A statement of the preliminary agency action;
3. A statement of the relief sought; and
4. Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

1. The names, addresses, and telephone numbers of any persons who may attend the mediation;
2. The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;
3. The agreed allocation of the costs and fees associated with the mediation;
4. The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;
5. The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;
6. The name of each party's representative who shall have authority to settle or recommend settlement; and
7. The signatures of all parties or their authorized representatives.

As provided in **section 120.573, F.S.**, the timely agreement of all parties to mediate will toll the time limitations imposed by **sections 120.569 and 120.57** for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the FDEP must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such a modified final decision of the FDEP have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the DERM shall notify all parties in writing that the administrative hearing processes under **sections 120.569 and 120.57** remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

In addition to the above, a person subject to regulation has a right to apply to the FDEP for a variance from or waiver of the requirements of particular rules, on certain conditions, under **section 120.542, F.S.** The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver of any state rule is made by filing a petition with the Office of General Counsel of the Department: 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

Pursuant to Section 403.815, F.S., DEP Rule 62-110.106(7) F.A.C., and Rule 62-210.350 F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the DERM Air Facilities Section at the address listed below. The applicant shall provide proof of publication to the DERM Air Facilities Section, in person at 33 SW 2nd Avenue, Suite 900, Miami, Florida 33130-1540, or by mail to the DERM Air Facilities Section, 33 SW 2nd Avenue, Suite 900, Miami, Florida 33130-1540, within seven days of publication. The DERM will accept as proof of publication only the original notarized affidavit provided to the applicant by the newspaper. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The complete project file, including the application, all supporting information, and draft permit (exclusive of confidential records under Section 403.111, F.S.) is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the DERM Air Facilities Section, 33 SW 2nd Avenue, Suite 900, Miami, Florida 33130-1540.

The DERM will accept written comments concerning the proposed permit issuance action for a period of 14-days from the date of publication of Public Notice of Intent to Issue Air Permit. Written comments should be provided to the DERM Air Facilities Section, 33 SW 2nd Avenue, Suite 900, Miami, Florida 33130-1540. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the DERM shall revise the proposed permit and require, if applicable, another public notice.

The DERM will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57, Florida Statutes (F.S.), or a party requests mediation as an alternative remedy under section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the DERM's proposed permitting decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) with the DERM Air Facilities Section at 33 SW 2nd Avenue, Suite 900, Miami, Florida 33130-1540. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any other person must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

1. The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
2. A statement of how and when each petitioner received notice of the DERM's action or proposed action;
3. A statement of how each petitioner's substantial interests are affected by the DERM's action or proposed action;
4. A statement of the material facts disputed by the petitioner, if any;
5. A statement of the facts that the petitioner contends warrant reversal or modification of the DERM's action or proposed action;
6. A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the DERM's action or proposed action; and

St. Ives Avanti.

Permit No.: 0250479-003-AC

1. The names, addresses, and telephone numbers of the petitioner;
2. The names, addresses, and telephone numbers of the attorney or qualified representative of the petitioner, if any;
3. Each rule or portion of a rule from which a variance or waiver is requested;
4. The citation to the statute underlying (implemented by) the rule identified in (c) above;
5. The type of action requested;
6. The specific facts that would justify a variance or waiver for the petitioner;
7. The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
8. A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The FDEP will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in **section 120.542(2), F.S.**, and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Miami-Dade County, Florida.

DEPARTMENT OF ENVIRONMENTAL
RESOURCES MANAGEMENT


H. Patrick Wong, Chief
Air Quality Management Division

7/26/04
Date

HPW/vg

Attachment

Copy: Tom Tittle, Florida Department Of Environmental Protection, Southeast District Office.
James T. Show, P.E., Grove Scientific & Engineering Company, 6140 Edgewater Drive Suite F, Orlando,
FL 32810

FILING AND ACKNOWLEDGMENT: FILED, on this date, pursuant to § 120.52(7), F.S., with the designated DERM Clerk, receipt of which is hereby acknowledged.


Clerk

7/26/04
Date

MIAMI-DADE COUNTY, FLORIDA

MIAMI-DADE

AIR EMISSIONS
RENEWAL APPLICATION

ENVIRONMENTAL RESOURCES MANAGEMENT
AIR QUALITY MANAGEMENT DIVISION
33 S.W. 2nd AVENUE
SUITE 900
MIAMI, FLORIDA 33130-1540
TELEPHONE: (305) 372-6925
FAX: (305) 372-6954

PERMITEE:

Ms Jeanne M Caruana
ST. IVES INC. AVANTI
13449 NW 42 AVENUE
MIAMI, FL 33054-

May 02, 2005

BUSINESS LOCATION

PERMIT NO.: AP-0065-2004
ST. IVES INC. AVANTI
13449 NW 42 AVE
MIAMI, FL 33054-
(305) 685-7381

CHANGE OF INFORMATION (ONLY IF DIFFERENT FROM ABOVE)

PERMITEE:

MAILING NAME:

MAILING ADD., UNIT/BAY, CITY, STATE, ZIP:

BUSINESS NAME:

BUSINESS ADD., UNIT/BAY, CITY, STATE, ZIP:

TELEPHONE:

To ensure that our records are correct, please review the information above and verify that it is accurate. Make all corrections in the CHANGE OF INFORMATION column.

This application is for a DERM AP permit for the period July 01, 2005 thru June 30, 2006 as required by County Ordinance #24-18. This application must be completed and mailed to this Department by June 15, 2005. Please note that a penalty may be assessed for applications received after the expiration date. Please attach a check to this application in the amount of \$700.00 made payable to "MIAMI DADE COUNTY," and include your operating permit number on it. This fee amount is based on the fee schedule approved by the Board of County Commissioners.

The undersigned owner or authorized representative* of ST. IVES INC. AVANTI is fully aware that the statements made in this application for an operating permit are true, correct, and complete to the best of the applicant's knowledge and belief. Further, the undersigned agrees to maintain and operate the pollution source and pollution control facilities in such a manner as to comply with the provisions of Chapter 24, Miami-Dade County Code, and all the rules and regulations of this Department.

Jeanne M Caruana
Signature, Owner or Authorized Representative

JEANNE M. CARUANA, CFO 5-6-05
Print Name and Title

Sworn and subscribed before me this 6 day of May 2005.

Isabel C. Hernandez
Notary Public (Notarization is mandatory)

*Attach letter of authorization.



Isabel C. Hernandez
Commission # DD270191
Expires: Nov. 25, 2007
Aaron Notary
1-800-350-5161

THIS CHECK IS VOID WITHOUT A COLORED BACKGROUND AND AN ARTIFICIAL WATERMARK ON THE BACK - HOLD AT ANGLE TO VIEW

St Ives Inc
Avanti

13449 NW 42nd Avenue
Miami, Florida 33054

SUNTRUST
64-79/611

3012774

05/12/05
DATE

\$700.00
AMOUNT

Seven Hundred and 00/100 Dollars

PAY
TO THE
ORDER
OF

Miami Dade County
Air Quality Mgmt Division
Permit No: AP-0065-2004
Miami FL 33130-1540

VALID FOR 90 DAYS. VALID ONLY WITH TWO SIGNATURES.

AUTHORIZED SIGNATURES

⑈3012774⑈ ⑆061100790⑆ 6702702950168⑈

Payee	Amount	Net Amount	Date 05/12/05 Reference	Check 3012774 Discount
Miami Dade County				
oucher				
15,677	700.00	700.00	AP-0065-2004	0.00
tal	700.00	700.00		0.00

MIAMI-DADE COUNTY, FLORIDA

MIAMI-DADE



ENVIRONMENTAL RESOURCES MANAGEMENT
AIR QUALITY MANAGEMENT DIVISION
33 S.W. 2nd AVENUE
SUITE 900
MIAMI, FLORIDA 33130-1540
TELEPHONE: (305) 372-6925
FAX: (305) 372-6954

August 18, 2004

NOTICE OF AIR POLLUTION PERMIT

CERTIFIED MAIL: 7000 0600 0025 3505 0331
RETURN RECEIPT REQUESTED

ISSUED TO:

Ms. Jeanne M. Caruana
Executive VP, CFO
St. Ives Avanti
13449 NW 42 Avenue
Miami, FL 33054

Permit Number: 0250479-003-AC
Issue Date: August 18, 2004
Expiration Date: August 17, 2005

Project: Air Construction Permit to modify conditions in Construction Permit AC-13-215233 and replace existing catalytic oxidizers with a Regenerative Thermal Oxidizer (RTO).

Facility Description: Facility engages in Commercial Printing (SIC/NAICS # - 2759/323119).

Location: 13449 NW 42 Avenue, Miami, Miami-Dade, FL 33054

Lat./Long: 25° 53' 11" N / 80° 16' 05" W

This is Permit Number 0250479-003-AC to construct an air pollution source issued by the **Miami-Dade County, Department of Environmental Resources Management (DERM)** pursuant to **Chapter 24, Code of Miami-Dade County and Chapter 403.087, Florida Statutes (F.S.)**. This is a construction permit authorizing the construction of the emissions units described in the permit.

The Florida Department of Environmental Protection (FDEP) has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the FDEP recognizes the DERM as the approved local air pollution control program of Miami-Dade County. Through a Specific Operating Agreement, the FDEP delegated to the DERM the authority to issue or deny permits for this type of air pollution source located in Miami-Dade County.

STATEMENT OF BASIS:

This permit is issued under the provisions of **Chapter 24, Code of Miami-Dade County, Chapter 403, Florida Statutes (F.S.)**, and **Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297**, and in conformance with all existing regulations of the FDEP and the DERM rules. The above named owner or operator is hereby authorized to perform the work or construct the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the DERM and made a part hereof and specifically described in this permit.

PERMIT CONTENTS:

Part I -- Summary Information
Part II -- Facility-Wide Specific Conditions
Part III -- Emission Unit Specific Conditions
Appendix A -- General Conditions

PART I -- SUMMARY INFORMATION

This permit addresses the following air pollution emission unit(s):

Emissions Unit Number	Emissions Unit Description
008	Two Printing Presses with emissions controlled by an Advanced Energy Group (AEG) Regenerative Thermal Oxidizer

* Note: Printing Presses are existing

SIGNIFICANT DATES:

Application Received on March 23, 2004

REGULATORY CLASSIFICATION

This facility is classified as a non-Title V minor source of air pollution.

PERMIT HISTORY:

Permit 0250479-002-AO was issued on November 24, 2003; Expiration Date: November 23, 2008.
Permit 0250479-001-AO was issued on October 22, 1998; Expiration Date: October 21, 2003
Permit AO-13-220074 was issued on September 28, 1993; Expiration Date: September 30, 1998
Permit AC-13-215233 was issued on August 26, 1992; Expiration Date: December 15, 1992
Permit AC-13-201431 was issued on January 2, 1992; Expiration Date: December 15, 1992
Permit AO-13-111925 was issued on January 6, 1986; Expiration Date: December 30, 1990
Permit AC-13-098943 was issued on June 3, 1985; Expiration Date: November 30, 1985

PART II -- FACILITY-WIDE SPECIFIC CONDITIONS

1.0 Administrative Requirements

- 1.1 Regulating Agencies: All applications, tests, reports, notifications, or other submittals required by this permit shall be submitted to the Miami-Dade County Department of Environmental Resources Management, Air Facilities Section located at 33 SW 2nd Avenue, Suite 900, Miami, Florida 33130-1540.
- 1.2 Citation Format: In this permit, references to F.A.C. Rule 62-xxx refer to rules promulgated under Title 62 of the Florida Administrative Code; references (if any) to 40 CFR 60.xx (or 61.xx or 63.xx) refer to regulations codified under Part 60 (or 61 or 63) of Title 40 of the Code of Federal Regulations.

- 1.3 Specific and General Conditions: The owner or operator shall be subject to the specific conditions of this permit and the owner or operator shall be aware of, and operate under, the attached General Conditions, attached as Appendix A of this permit. General Conditions are binding and enforceable pursuant to Chapter 403, F.S.
[Rule 62-4.160 F.A.C.]
- 1.4 Applicable Regulations: This facility is subject to regulation of Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any other applicable federal, state, or local permitting requirements or other regulations.
- 1.5 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid and hazardous wastes in accordance with all applicable Federal, State and Local regulations.
- 1.6 Other Permits: This air pollution permit does not preclude the owner or operator from obtaining any other types of required permits, licenses or certifications from the DERM or other departments or agencies.
- 1.7 Operation Permit Required: This permit authorizes construction and/or installation of the permitted emission unit(s) and initial operation to determine compliance with the FDEP and the DERM rules. **An operation permit is required for regular operation of the permitted emission units.** The owner or operator shall apply for and receive an operation permit prior to expiration of this permit. An application for an operation permit shall be submitted to the Miami-Dade County Department of Environmental Resources Management, Air Facilities Section. To apply for an operation permit, the applicant shall submit the appropriate application fee and, in triplicate, the appropriate application form, a certification that construction was completed with a notation of any deviations from the conditions on the construction permit, compliance test results, and such additional information as the DERM may by law require.
[Rule 62-4.030, 62-4.050, 62-4.220, and 62-210.300 F.A.C.]
- 1.8 Extension of This Permit: The expiration date of this construction permit may be extended upon request of the owner or operator and submission of the appropriate fee to the Miami-Dade County, Department of Environmental Resources Management, Air Facilities Section **at least 60 days prior** to the expiration date of this permit.
[Rule 62-4.030, 62-4.050, and 62-4.220 F.A.C.]
- 2.0 General Pollutant Emission Limiting Standards**
- 2.1 Objectionable Odor Prohibited: No person shall 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.]
- 2.2 General Visible Emissions Standard: Unless otherwise specified by permit or rule, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than 20 percent opacity at any time.
[Rule 62-296.320(4)(b) F.A.C.]
- 2.3 Volatile Organic Compounds/Organic Solvents Emissions:
No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the DERM.

Such controls include the following:

- Tightly cover or close all VOC containers when they are not in use.
 - Tightly cover all open tanks, which contain VOCs when they are not in use.
 - Maintain all pipes, valves, fittings, etc., which handle VOCs in good operating condition.
 - Confine rags used with VOCs to tightly closed, fireproof containers when not in use.
 - Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.
- [Rule 62-296.320(1) F.A.C.]

2.4 Unconfined Emissions of Particulate Matter:

No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.

Reasonable precautions include the following:

- Paving and maintenance of roads, parking areas and yards.
 - Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - Application of asphalt, water, chemicals, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities.
 - Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - Landscaping or planting of vegetation.
 - Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.
 - Confining abrasive blasting where possible.
 - Enclosure or covering of conveyor systems.
 - Substitution of powdery materials with granular or pelletized materials, where possible.
- [Rule 62-296.320(4)(c) F.A.C.]

3.0 **Operation Requirements**

3.1 Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650 F.A.C.]

3.2 Excess Emissions: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing the best operational practices to minimize emissions are adhered to, and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the DERM for longer duration.
Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700 F.A.C.]

4.0 **Compliance Testing Requirements**

4.1 Test Notification: Unless otherwise specified in this permit, the DERM Air Facilities Section shall be notified in writing of expected compliance test dates (when required) at least fifteen (15) days prior to compliance testing. The notification shall include the following information: the date, time, and location of each test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner.
[Rule 62-297.310(7)(a) 9 F.A.C.]

- 4.2 **Testing at Capacity:** Compliance testing (when required) shall be conducted with the emission units operating at the permitted capacity (90 to 100% of the maximum permitted operation rate of the emission units). If an emission unit is not tested at permitted capacity, the emission unit shall not be operated above 110% of the test load until a new test showing compliance is conducted. Operation of the emissions unit above 110% of the test load is allowed for no more than 15 days for the purpose of conducting additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2) F.A.C.]
- 4.3 **Special Compliance Tests:** When the DERM, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard in Rules 62-204 through 62-297 or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the DERM.
[Rule 62-297.310(7)(b) F.A.C.]
- 5.0 **Reporting and Record Keeping Requirements**
- 5.1 **Report Excess Emissions:** In case of excess emissions resulting from malfunctions, each owner or operator shall notify the DERM in accordance with Rule 62-4.130, F.A.C. (condition 5.2 below). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the DERM.
[Rule 62-210.700(6) F.A.C.]
- 5.2 **Report Plant Operation Problems:** If the owner or operator is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the owner or operator shall immediately notify the DERM. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the owner or operator from any liability for failure to comply with the FDEP and the DERM rules.
[Rule 62-4.130 F.A.C.]
- 5.3 **Retain Records:** All records required by this permit shall be kept by the owner or operator and made available for the DERM inspection for a minimum of three (3) years from the date of such records.
[Rule 62-4.160(14)(b) F.A.C.]
- 5.4 **Compliance Test Reports:** Compliance test reports (when required) shall be submitted to the DERM Air Facilities Section, as soon as practical, but no later than 45 days after the last sampling run of each test is completed.
[Rule 62-297.310(8)(a) &(b) F.A.C.]

Test reports shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the DERM to determine if the test was properly conducted and the test results properly computed. Test reports, other than for an EPA Method 9 test, shall include the following information and other information as necessary to make a complete report required pursuant to F.A.C. Rule 297.310(8)(c):

- The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 - All measured and calculated data required to be determined by each applicable test procedure for each run.
 - The detailed calculations for one run that relate the collected data to the calculated emission rate.
-

- The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.

5.5 Annual Operating Report Required: On or before March 1 of each calendar year, a completed DEP Form 62-210.900(5), Annual Operating Report (AOR) Form for Air Pollutant Emitting Facility, shall be submitted to the Miami-Dade County Department of Environmental Resources Management, Air Facilities Section. Included with this report shall be any additional reports, if any, required by this permit in Part III - Emission Unit Specific Conditions.
[Rule 62-210.370(3) F.A.C.]

PART III -- EMISSION UNIT SPECIFIC CONDITIONS

This part of this permit addresses the following emission units:

Emissions Unit Number	Emissions Unit Description
008	Two Printing Presses with emissions controlled by an Advanced Energy Group (AEG) Regenerative Thermal Oxidizer (RTO): • Printing Presses - Komori S-38, 38", 5 Unit Printing Press - Maximum press speed 1,600 fpm. 38-inch web, 5 printing units and a TEC drier. - Harris M-1000B, 8 Unit Double Web Press - Maximum press speed 2,000 fpm. 8-unit web press with TEC double drier. • Advanced Energy Group (AEG) Regenerative Thermal Oxidizer - Natural Gas Fired- 4.3 MMBtu/hr consumed during start up - Designed for 17,000 scfm - Destruction Efficiency 99% for VOC - Minimum Operating Temperature- 1450 F - Minimum Set Point Temperature: 1500 F - Typical Operating Temperature greater than 1500 F - Throughput Rate 416 lbs of solvent @ 18,500 Btu/Lb - Single Vertical Steel Stack – 36" I.D.

* Note: Printing Presses are existing

1.0 This permit supersedes previously issued Permit No. AC 13-215233.

2.0 Emissions Limiting Standards and Operation Restrictions

- 2.1 Visible Emissions: Visible emissions shall not equal or exceed 20% opacity at any time.
[Rule 62-296.320(4)(b) F.A.C.]
- 2.2 Facility Wide VOC Emissions: Facility-wide total emissions of volatile organic compounds (VOCs), including hazardous air pollutants (HAPs), shall not equal or exceed 100 tons in any consecutive 12-month period.
[Rule 62-4.070(3) F.A.C.]
- 2.3 Facility Wide HAP Emissions: Facility-wide total emissions of all hazardous air pollutants (HAPs) shall not equal or exceed 25 tons in any consecutive 12-month period.
[Rule 62-4.070(3) F.A.C.]
- 2.4 Individual HAP Emissions: Facility-wide total emissions of any individual hazardous air pollutant (HAP) shall not equal or exceed 10 tons in any consecutive 12-month period.
[Rule 62-4.070(3) F.A.C.]
- 2.5 Operating Temperature: Whenever any press is in operation the RTO shall be maintained to have a minimum operating temperature of 1450°F.
[Rule 62-4.070(3) F.A.C.]
- 2.6 Allowable Fuel: Fuel for the RTO shall be limited to natural gas.
[Rule 62-4.070(3) F.A.C.]

- 2.7 Hours of Operation: The referenced emission unit(s) may operate continuously, i.e. 8,760 hours per year.
[Rule 62-4.070(3) F.A.C]

3.0 Compliance Monitoring and Testing Requirements

- 3.1 Testing Requirements: To demonstrate compliance with the emission limiting standards of this permit, the permittee shall demonstrate the VOC/HAP destruction efficiency by using EPA Method 25 or 25A. A destruction efficiency test shall be performed within forty-five (45) days after the startup of the RTO.
[Rule 62-4.070(3) F.A.C]
- 3.2 Testing Frequency: The permittee shall perform a destruction efficiency test annually on the RTO. Within 45 days following test completion, results of the above tests shall be submitted along with a compliance test report to the Miami-Dade County, Department of Environmental Resources Management (DERM).
[Rule 62-4.070(3) F.A.C]
- 3.3 Monitoring Equipment: Monitoring equipment shall continuously monitor and record the RTO chamber temperatures. The permittee shall operate, maintain, and calibrate the monitoring equipment in accordance with the manufacturer's recommendations.
[Rule 62-4.070(3) F.A.C]

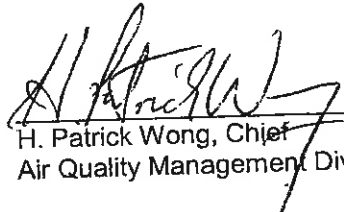
4.0 Reporting and Record Keeping Requirements

- 4.1 VOC Content and Emissions: The permittee shall determine the VOC content of all materials, including solvents, shall monitor the usage of such materials at the referenced emissions unit(s), and shall record and maintain the following information:
- The VOC content for each material containing or emitting VOCs.
 - The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emissions unit(s).
 - The total monthly VOC emissions rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month.
 - A rolling consecutive 12-month total emissions rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.
- [Rule 62-4.070(3) F.A.C]
- 4.2 HAP Content and Emissions: The permittee shall determine the total and individual HAP contents of all materials, including solvents, shall monitor the usage of such materials at the referenced emissions unit(s), and shall record and maintain the following information:
- The individual and total HAP contents for each material containing or emitting HAPs.
 - The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emissions unit(s).
 - The individual and total monthly HAP emissions rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.
 - A rolling consecutive 12-month total emissions rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months.
- [Rule 62-4.070(3) F.A.C]
- 4.3 RTO Temperatures: Records of the RTO chamber temperature from the monitoring equipment shall be maintained and made available for the inspectors.
[Rule 62-4.070(3) F.A.C]

- 4.4 Equipment Calibration: The date, the name of the technician, and procedures for performing the calibration on the continuous temperature monitoring system shall be documented. Such records shall be kept in a maintenance log and made available for the inspectors. Additionally, maintenance and repair activities on the RTO shall be documented and included in the maintenance log.
[Rule 62-4.070(3) F.A.C.]
- 4.5 Recycling Log: The owner or operator shall record and maintain the amount of chemicals manifested to recyclers, the manufacturer or the dump.
[Rule 62-4.070(3) F.A.C.]

Executed in Miami-Dade County, Florida.

DEPARTMENT OF ENVIRONMENTAL
RESOURCES MANAGEMENT

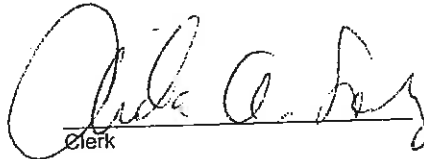

H. Patrick Wong, Chief
Air Quality Management Division

8/18/04
Date

HPW/mg

Copy: Tom Tittle, Florida Department of Environmental Protection, Southeast District Office
James T. Show, P.E., Grove Scientific & Engineering Company, 6140 Edgewater Drive Suite F, Orlando,
FL 32810

FILING AND ACKNOWLEDGMENT: FILED, on this date, pursuant to § 120.52(7), F.S., with the designated DERM Clerk, receipt of which is hereby acknowledged.


Clerk

8/18/04
Date

APPENDIX A
GENERAL CONDITIONS

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections **403.141, 403.727, or 403.859 through 403.861, Florida Statutes (F.S.)**. The permittee is placed on notice that the DERM will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the DERM.
3. As provided in **Subsections 403.087(6) and 403.722(5), F.S.**, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other DERM permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and DERM's rules, unless specifically authorized by an order from the DERM.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by DERM's rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by DERM's rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized DERM personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - (a) Have access to and copy any records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or DERM's rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in the permit, the permittee shall immediately notify and provide the DERM with the following information:
 - (a) A description of and cause of noncompliance; and