

Check Sheet

Company Name: Ann Graphics, Inc.
 Permit Number: AC 06-233561
 PSD Number: _____
 Permit Engineer: _____

Application:

- Initial Application
 - Incompleteness Letters
 - Responses
 - Waiver of Department Action
 - Department Response
 - Other

Cross References:

- AC 06-170598
- AC 06-202012
- AC 06-231892

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT or LAER Determination
- Unsigned Permit
 - Correspondence with:
 - EPA
 - Park Services
 - Other
- Proof of Publication
 - Petitions - (Related to extensions, hearings, etc.)
 - Waiver of Department Action
 - Other

Final

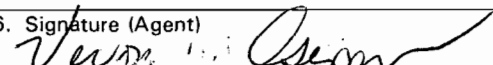
Determination:

- Final Determination
- Signed Permit
- BACT or LAER Determination
 - Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other


Is your RETURN ADDRESS completed on the reverse side?

SENDER: <ul style="list-style-type: none"> • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered. 		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Norm Nichol, Pres Sun Graphic, Inc 1820 NW 21st St Pompano Bch, FL 33060		4a. Article Number P 230 524 401	
5. Signature (Addressee)		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
6. Signature (Agent) 		7. Date of Delivery 9/1	
PS Form 3800, June 1991		8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

PS Form 3800, June 1991 U.S. GPO: 1992-323-402 DOMESTIC RETURN RECEIPT

P 230 524 401

 **Receipt for Certified Mail**
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to	Norm Nichol
Street and No.	Sun Graphic
P.O., State and ZIP Code	Pompano Bch, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	AC 06-23350 8-30-93

PS Form 3800, June 1991

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DER File No. AC 06-233501
Broward County

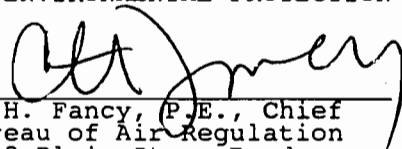
Mr. Norm Nichol, President
Sun Graphic, Inc.
1820 Northwest 21st Street
Pompano Beach, Florida 33060

Enclosed is Construction Permit Number AC 06-233501 for a modification to the air stripper tower system at your lithographic blanket manufacturing plant located at 1820 Northwest 21st Street, Pompano Beach, Broward County, Florida 33060. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

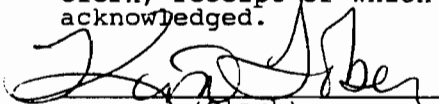

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 8-30-93 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.


(Clerk)

8-30-93
(Date)

Copies furnished to:
Isidore Goldman, SED
Gary Carlson, Broward Co.
Robert Baker, P.E.

Final Determination

Sun Graphic, Inc.
Pompano Beach, Florida
Broward County

Air Stripper Tower System
for Contaminated Groundwater and
Solvent Recovery System Waste Water

Permit No. AC06-233501

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

August 27, 1993

Final Determination

The Technical Evaluation and Preliminary Determination for a permit to construct (modify) an air stripper tower system at Sun Graphic, Inc.'s lithographic blanket manufacturing plant in Pompano Beach, Broward County, Florida, was distributed on July 28, 1993. The Notice of Intent to Issue was published in the Sun - Sentinel on August 10, 1993. Copies of the evaluation were available for public inspection at the Department offices in Tallahassee and West Palm Beach and the Broward County Environmental Quality Control Board office in Ft. Lauderdale.

The only comments submitted were from the applicant. They requested that the design capacity be included in the air stripper tower system description and that the limits on toluene concentration in the water and emissions be on a quarterly average basis. This will allow the applicant to adjust the operation of the air stripper tower system to meet the emission limits if higher than estimated toluene concentration are encountered in the ground water. Both of these changes are acceptable to the Department.

The final action of the Department will be to issue construction permit No. AC 06-233501 as proposed in the Technical Evaluation and Preliminary Determination except for the changes noted above.



Lawton Chiles
Governor

Florida Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE:
Sun Graphic, Inc.
1820 NW 21st Street
Pompano Beach, Florida 33060

Permit Number: AC 06-233501
Expiration Date: March 1, 1994
County: Broward
Latitude/Longitude: 26°15'26"N
80°08'49"W

Project: Air Stripper Tower
System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-210, 17-212, 17-272, 17-296, 17-297, and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction (modification) of a 99+% efficient contaminated water air stripper system consisting of a shallow well, collection tank, piping, tower feed pump, 28.3 ft. (min) high air stripper tower (1.5 ft. diameter packed column containing 22 ft. of packing), mist eliminator, air blower (1,060 actual cubic feet per minute (ACFM)), and a biocide feeder. The air stripper tower system is designed to process 50 gallons per minute (GPM) of wastewater containing 370,000 micrograms per liter (ug/l) of toluene but only authorized to treat 22 GPM of contaminated water (18 GPM groundwater and 4 GPM solvent recovery system wastewater). The air stripper system will be located at the permittee's existing lithographic blanket manufacturing plant in Pompano Beach, Broward County, Florida.

The UTM coordinates of this site are Zone 17, 585.2 km E and 2904.3 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received June 14, 1993.
2. Baker Enviro. Eng. Inc. letter dated August 16, 1993.

PERMITTEE:
Sun Graphic, Inc.

Permit Number: AC 06-233501
Expiration Date: March 1, 1994

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 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department 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 Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, 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 Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement 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 Department rules, unless specifically authorized by an order from the Department.

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 Department 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 Department rules.

PERMITTEE:
Sun Graphic, Inc.

Permit Number: AC 06-233501
Expiration Date: March 1, 1994

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, 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 Department 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 this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

PERMITTEE:
Sun Graphic, Inc.

Permit Number: AC 06-233501
Expiration Date: March 1, 1994

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

PERMITTEE:
Sun Graphic, Inc.

Permit Number: AC 06-233501
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

1. The contaminated water flow to the air stripper column shall not exceed 18 GPM of groundwater and 4 GPM of solvent recovery system (SRS) wastewater for a total flow of 22 GPM. The permittee shall check the flow rate to the column (stripper) at least once during each normal business day that the system is in operation.
2. Unless the emissions from the air stripper tower system are sent to the solvent recovery system (SRS), the concentration of toluene in the contaminated ground water shall not exceed 26,000 ug/l or 5.6 lbs/day, (3-month average). The concentration of toluene in the SRS wastewater shall not exceed 360,000 ug/l or 17.3 lbs/day. The influent and effluent from the air stripper shall be tested for benzene, toluene, ethyl benzene, and xylene (BTEX) compounds every month by Methods 5030/8020 or other methods with the approval of the Department.
3. Based on the procedures described in the Department's October 20, 1987, memorandum titled Final Air Stripper Review Procedure, or other methods with prior approval of the Department, the emissions from the air stripper system shall not exceed:

Pollutant	Maximum Emissions lbs/hr	TPY (Avg)
Toluene	0.96*	4.2
Benzene	0.010	0.042
Ethyl Benzene	0.010	0.042
Xylene	0.010	0.042

* 3 month average

4,324TPY

The Department may require analysis of the ground water for any suspected compound it has good reason to believe is being emitted in excess of the quantities listed in the application.

4. The air stripper system may operate continuously, 8760 hrs/yr.
5. The air stripper column system shall not discharge air pollutants in quantities that cause or contribute to objectionable odors.
6. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

PERMITTEE:
Sun Graphic, Inc.

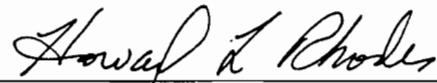
Permit Number: AC 06-233501
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

7. A request to modify the operation permit must be submitted to the Southeast District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for a modification, the applicant shall submit a written request for a modification, fee, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this 27 day
of August, 1993


STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Howard L. Rhodes, Director
Division of Air Resources
Management

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes
FROM: C. H. Fancy 
DATE: August 27, 1993
SUBJ: Approval of Construction Permit
Sun Graphic, Inc.

Attached for your approval and signature is a permit to construct (modify) an existing air stripper tower system at Sun Graphic's Pompano Beach plant. The air stripper system is used to remove solvents from contaminated groundwater and solvent recovery system waste water. The air stripper permit modification is needed because of higher toluene concentrations in the groundwater caused by a recent spill at the plant.

The only comments received were from the applicant who asked that the design capacity of the air stripper be included in the permit description and that the limits on the toluene concentration in the groundwater and toluene emissions be based on a quarterly average.

I recommend your approval and signature.

CHF/WH/bjb

Attachments



6821 S.W. Archer Road
Gainesville, FL 32608
TEL (904) 371-9451
FAX (904) 378-1500

RECEIVED

August 20, 1993
B-2253

AUG 30 1993

Division of Air
Resources Management

Mr. Willard Hanks
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Sun Graphic, Inc.
Permit # AC06-170598
Solvent Recovery System
Request for Lacolene Permit Change

Dear Willard:

I am writing in response to your August 10, 1993 fax in which you asked for Sun Graphic, Inc.'s (Sun) about changing the permit conditions to reflect a phased reduction of Lacolene usage through April of 1994. I have discussed the idea with Sun Graphic, Inc. (Sun) management and they feel it was a good suggestion but can not guarantee that the Lacolene usage will be 100 gallons per month by April of 1994.

Therefore, Sun would like to proceed with a permit change under the conditions outlined in my August 6th letter as follows:

- o Reduce the Toluene and adhesive allowable VOC emissions to equal the increase in estimated Lacolene emissions.
- o Increase the allowable Lacolene usage to a maximum of 300 gallons in one month and a maximum of 2400 gallons per 12-month rolling period.

This proposed permit modification does not increase the permitted VOC emissions and would be simple to monitor for compliance.

Furthermore, the proposed permit modification is not an increase in "actual emissions". There is not a sufficient track record to show the latest two years of VOC emissions per the FAC 17-2 definition of actual emissions.

It was my understanding from the start of the SRS permitting that changes in solvent usages would not be considered a major permit change as long as the VOC emissions were within the permitted level.

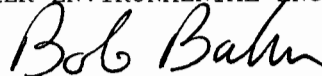
Letter to Mr. Willard Hanks
August 20, 1993
Page 2

Therefore, I request that the permit be modified per my letter of August 6, 1993.

Please let me know if you have any questions.

Sincerely,

BAKER ENVIRONMENTAL ENGINEERING, INC.



Robert A. Baker, P.E.

RAB:cnb

Enclosures

xc: Norm Nichol, Sun Graphic
David Beresford, Sun Graphic
Jim Crawford, Sun Graphic
Tom Tittle, FDEP



6821 S.W. Archer Road
Gainesville, FL 32608
TEL (904) 371-9451
FAX (904) 378-1500

August 16, 1993
B-2253

Mr. Willard Hanks
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED
AUG 18 1993
Division of Air
Resources Management

RE: Sun Graphic, Inc.
Permit # AC06-233501
Air Stripper

Dear Willard:

This letter is to confirm our telephone conversation on 8/10/93.

After reading the draft permit, I have the following comments:

- 1) That the design basis (50 GPM and 370,000 $\mu\text{g}/\text{l}$ of Toluene) should be mentioned in the description of the equipment.
- 2) That the permit conditions recognize that as the groundwater plume of Toluene is captured, some longer term averaging period is needed to deal with possible spikes in the Toluene concentrations. Typically, there is a 30 day delay from sampling to evaluation the laboratory results and another 30 day delay to see if the corrective actions were effective. Therefore, I requested at least a quarter (i.e. 90 days) averaging time period for all Toluene concentrations (groundwater and SRS related) and pounds per hour emission rates specified in the permit.

I have attached my handwritten corrections to the draft permit that should satisfy these 2 points.

Please let me know if you have any questions.

Sincerely,

BAKER ENVIRONMENTAL ENGINEERING, INC.

Robert A. Baker, P.E.

RAB:cnb

Enclosures

xc: Norm Nichol, Sun Graphic
David Beresford, Sun Graphic
Jim Crawford, Sun Graphic



Florida Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE: Sun Graphic, Inc.
1820 NW 21st Street
Pompano Beach, Florida 33060

Permit Number: AC 06-233501
Expiration Date: March 1, 1994
County: Broward
Latitude/Longitude: 26°15'26"N
80°08'49"W

Project: Air Stripper Tower
System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-210, 17-212, 17-272, 17-296, 17-297, and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction (modification) of a 99+% efficient contaminated water (18 GPM groundwater and 4 GPM solvent recovery system wastewater) air stripper system consisting of a shallow well, collection tank, piping, tower feed pump (22 GPM total), 28.3 ft. (min) high air stripper tower (1.5 ft. diameter packed column containing 22 ft. of packing), mist eliminator, air blower (1,060 ACFM), and a biocide feeder. The air stripper system will be located at the permittee's existing lithographic blanket manufacturing plant in Pompano Beach, Broward County, Florida.

The UTM coordinates of this site are Zone 17, 585.2 km E and 2904.3 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

*The air stripper was designed for handling 50 GPM
of 370,000 ug/l wastewater (as Toluene)*

Attachments are listed below:

1. Application received June 14, 1993.

PERMITTEE:
Sun Graphic, Inc.

Permit Number: AC 06-233501
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

1. The contaminated water flow to the air stripper column shall not exceed 18 GPM of groundwater and 4 GPM of solvent recovery system (SRS) wastewater for a total flow of 22 GPM. The permittee shall check the flow rate to the column (stripper) at least once during each normal business day that the system is in operation.

2. The concentration of toluene in the contaminated ground water shall not exceed ~~370,000~~ ug/l. The concentration of toluene in the SRS wastewater shall not exceed ~~260,000~~ ug/l. The influent and effluent from the air stripper shall be tested for the BTEX compounds every month by Methods 5030/8020 or other methods with the approval of the Department.

3. Based on the procedures described in the Department's October 20, 1987, memorandum titled Final Air Stripper Review Procedure, or other methods with prior approval of the Department, the emissions from the air stripper system shall not exceed:

Pollutant	Maximum Emissions lbs/hr	TPY (Avg)
Toluene	0.96	4.2
Benzene	0.010	0.042
Ethyl Benzene	0.010	0.042
Xylene	0.010	0.042

The Department may require analysis of the ground water for any suspected compound it has good reason to believe is being emitted in excess of the quantities listed in the application.

4. The air stripper system may operate continuously, 8760 hrs/yr.

5. The air stripper column system shall not discharge air pollutants in quantities that cause or contribute to objectionable odors.

6. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).



SUN GRAPHIC INC.
PRINTING PRESS BLANKET MFG.

1820 Northwest 21st Street • Pompano Beach, Florida 33069
Phone (305) 974-0217 – 974-0218

RECEIVED

AUG 17 1993

Division of Air
Resources Management

08/12/93

**Mr. Willard Hanks
Florida Department of
Environmental Protection
Twin Towers Office Bldg.
2600 Blair Stone Road
Tallahassee, Florida 32399-2400**

Dear Willard,

**Attached is proof of publication of the "Notice of Intent
to Issue" for the air stripper modification at this
location.**

Sincerely,

James E. Crawford
**James E. Crawford
Engineering Manager.**

**cc. Norman J. Nichol, President & COO
Robert Baker**

*A. Hanks
B. Ziffler
J. Friedman, SE Dist.
D. Carlson, BCNRP*

SUN - SENTINEL
PUBLISHED DAILY
FORT LAUDERDALE, BROWARD COUNTY, FLORIDA
BOCA RATON, PALM BEACH COUNTY, FLORIDA
MIAMI, DADE COUNTY, FLORIDA

STATE OF FLORIDA
COUNTY OF BROWARD/PALM BEACH/DADE
BEFORE THE UNDERSIGNED AUTHORITY PERSONALLY APPEAR

..... *Sharon Dwyer* WHO ON OATH SAYS THAT
HE/SHE IS A DULY AUTHORIZED REPRESENTATIVE OF THE
CLASSIFIED DEPARTMENT OF THE SUN-SENTINEL, DAILY
NEWSPAPER PUBLISHED IN BROWARD/PALM BEACH/DADE COUN
FLORIDA THAT THE ATTACHED COPY OF ADVERTISEMENT, BE

NOTICE OF INTENT

IN THE MATTER OF

AIR POLLUTION

IN THE CIRCUIT COURT, WAS PUBLISHED IN SAID NEWSPAP
THE ISSUES OF

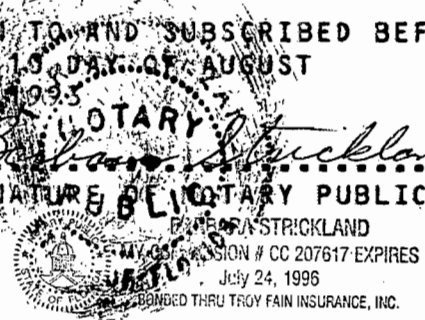
C , 08/10, 1 X

AFFIANT FURTHER SAYS THAT THE SAID SUN-SENTINEL IS
NEWSPAPER PUBLISHED IN SAID BROWARD/PALM BEACH/DADE
COUNTY, FLORIDA, AND THAT THE SAID NEWSPAPER HAS HE
BEEN CONTINUOUSLY PUBLISHED IN SAID BROWARD/PALM BE
COUNTY, FLORIDA, EACH DAY, AND HAS BEEN ENTERED AS
CLASS MATTER AT THE POST OFFICE IN FORT LAUDERDALE,
BROWARD COUNTY, FLORIDA, FOR A PERIOD OF ONE YEAR N
PRECEDING THE FIRST PUBLICATION OF THE ATTACHED COP
ADVERTISEMENT; AND AFFIANT FURTHER SAYS THAT HE/SHE
NEITHER PAID NOR PROMISED ANY PERSON, FIRM OR CORPO
ANY DISCOUNT, REBATE, COMMISSION OR REFUND FOR THE
OF SECURING THIS ADVERTISEMENT FOR PUBLICATION IN S
NEWSPAPER.

..... *Sharon Dwyer*
(SIGNATURE OF AFFIANT)

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 10 DAY OF AUGUST
A.D. 1993

..... *Patricia Strickland*
(SIGNATURE OF NOTARY PUBLIC)



.....
(NAME OF NOTARY TYPED, PRINTED OR STAMPED)

PERSONALLY KNOWN OR
PRODUCED IDENTIFICATION

State of Florida
Department of Environmental Protection
NOTICE OF INTENT TO ISSUE
The Department of Environmental Protection hereby gives notice of its intent to issue an air pollution construction permit (AC 06-233501) to Sun Graphic Inc., 1820 N.W. 21st St., Pompano Beach, Florida 33060. The permit authorizes the modification of an air stripper tower system that treats contaminated groundwater and solvent recovery system wastewater at their lithographic blanket manufacturing plant located at 1820 N.W. 21st St., Pompano Beach, Broward Co., Florida. The system will emit up to 0.96 lbs/hr and 4.2 TPY toluene along with smaller quantities of benzene, ethyl benzene, xylene, and other organic pollutants from the contaminated water. Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) determinations were not required. These emissions will not cause a violation of any ambient air quality standard. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.
A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.
The Petition shall contain the following information:
(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
(d) A statement of the material facts disputed by Petitioner, if any;
(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.
The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Department of Environmental Protection
Southeast District
1900 S. Congress Avenue, Suite A
West Palm Beach, Florida 33406
Broward County Environmental Quality Control Board
621 South Andrews Avenue
Fort Lauderdale, Florida 33310
Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.
August 10, 1993

I N T E R O F F I C E M E M O R A N D U M

Date: 14-Aug-1993 09:05am EST
From: Dea Wahlen TAL
WAHLEN_D
Dept: Office General Counsel
Tel No: (904)488-9730
SUNCOM: 278-9730

TO: Mary Williams WPB (WILLIAMS_M)
TO: Patty Adams TAL (ADAMS_P)
TO: Willard Hanks TAL (HANKS_W)

Subject: Sun Graphic, Inc.

On August 12, 1993, we received a request for extension of time from Robert A. Baker, the applicant, concerning the Notice of Permit Issuance for AC06-233501.



6821 S.W. Archer Road
Gainesville, FL 32608
TEL (904) 371-9451
FAX (904) 378-1500

August 6, 1993
B-2253

RECEIVED
AUG 08 1993
Division of Air
Resources Management

Mr. Willard Hanks
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Sun Graphic, Inc.
Permit No. AC-06-170598

Dear Willard:

I have discussed your suggestion of raising the required capture efficiency (from 90% to 91.5%) with my client. Rather than changing the capture efficiency, which in effect tightens the original design parameters for the equipment, a "pound-for-pound" reduction would be preferred.

Sun Graphic is not proposing an increase in volatile organic compound (VOC) emissions beyond the original approved totals. The usage amounts originally proposed for lactol, toluene, adhesive, etc. were estimated at the time the original application was submitted. With the data that has been gathered since that time Sun Graphic proposes to revise the amounts to better reflect current usages. As a result of changing from a solvent based adhesive and reducing the toluene emissions, Sun Graphic proposes the following revised limits that do not increase overall emissions, but do allow a higher usage of lactol.

	Existing TPY	Proposed TPY
1. Adhesive coating	2.70	0.40
2. Spreaders	55.07	53.82
3. Lactol	3.55	7.10
Subtotal	61.32	61.32
4. All other emissions	32.88	32.88
	-----	-----
	94.20	94.20

Letter to Mr. Willard Hanks
July 30, 1993
Page 2

It is requested that the permit be amended to reflect

1. A maximum of 300 gallons of Lactol per month
2. A maximum of 2400 gallons of Lactol per 12-months rolling period.

Please let me know if you have any comments or questions concerning this revised request.

Sincerely,

BAKER ENVIRONMENTAL ENGINEERING, INC.



Robert A. Baker, P.E.

RAB:lag

xc: Norm Nichol - Rycoline
David Beresford - Sun Graphic
Jim Crawford - Sun Graphic

Tom Tittle 8/10/93
Bill Peffer 8/10/93
Jeanne Elias 8/10/93
Willard Hanks 8/10/93

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
*Norm Nichol, Pres.
 Sun Graphic, Inc
 1820 NW 21st St.
 Pompano, Bch, FL
 33060*

4a. Article Number
P 230 524 376

4b. Service Type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

7. Date of Delivery
7/30

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

P 230 524 376



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, June 1991

Sent to <i>Norm Nichol</i>	
Street and No. <i>Sun Graphic</i>	
P.O. State and Zip Code <i>Pompano Bch, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>7-28-93</i>
<i>AC 06-233501</i>	

*OK
 GPL
 7/22
 OK 7-22*



Florida Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

July 23, 1993

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Norm Nichol, President
Sun Graphic, Inc.
1820 Northwest 21st Street
Pompano Beach, Florida 33060

Dear Mr. Nichol:

Attached are the Technical Evaluation and Preliminary Determination and proposed permit to construct (modify) an air stripper tower system for contaminated groundwater and solvent recovery system waste water at your existing lithographic blanket manufacturing plant in Pompano Beach, Broward County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/WH/plm

Attachments

c: Isidore Goldman, SE District
Gary Carlson, Broward Co.
Robert Baker, P.E.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of
Application for Permit by:

Sun Graphic, Inc.
1820 N.W. 21st Street
Pompano Beach, Florida 33060

DEP File No. AC 06-233501

INTENT TO ISSUE

The Department of Environmental Protection hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Sun Graphic, Inc., applied on June 21, 1993, to the Department of Environmental Protection for a permit to construct (modify) an air stripper tower system that treats contaminated groundwater and solvent recovery system waste water at the existing lithographic blanket manufacturing plant in Pompano Beach, Broward County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-210 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permits. 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. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

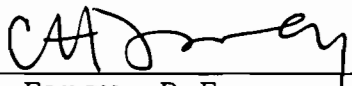
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this

proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 7-28-93 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



Clerk

7-28-93
Date

Copies furnished to:

Isidore Goldman, SE District
Gary Carlson, Broward Co.
Robert Baker, P.E.

State of Florida
Department of Environmental Protection
Notice of Intent to Issue

The Department of Environmental Protection hereby gives notice of its intent to issue an air pollution construction permit (AC 06-233501) to Sun Graphic Inc., 1820 N.W. 21st St., Pompano Beach, Florida 33060. The permit authorizes the modification of an air stripper tower system that treats contaminated groundwater and solvent recovery system wastewater at their lithographic blanket manufacturing plant located at 1820 N.W. 21st St., Pompano Beach, Broward Co., Florida. The system will emit up to 0.96 lbs/hr and 4.2 TPY toluene along with smaller quantities of benzene, ethyl benzene, xylene, and other organic pollutants from the contaminated water. Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) determinations were not required. These emissions will not cause a violation of any ambient air quality standard. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
Southeast District
1900 S. Congress Avenue, Suite A
West Palm Beach, Florida 33406

Broward County Environmental Quality
Control Board
621 South Andrews Avenue
Fort Lauderdale, Florida 33310

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Sun Graphic, Inc.
Pompano Beach, Florida
Broward County

Air Stripper Tower System
for Contaminated Groundwater and
Solvent Recovery System Waste Water

Permit No. AC 06-233501

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

July 23, 1993

I. General Information

A. Applicant

Sun Graphic, Inc.
1820 Northwest 21st Street
Pompano Beach, Florida 33060

B. Request

On August 3, 1990, Sun Graphic, Inc. submitted an application for permit to construct an air stripper tower system to treat contaminated ground water caused by leaking underground solvent (toluene) storage tanks at their existing lithographic blanket manufacturing plant (SIC 3069) located at 1820 Northwest 21st Street, Pompano Beach, Broward County, Florida. On June 21, 1993, they submitted another application for permit to construct (modify) this air stripper tower system. The modification was needed because of a new toluene spill at the plant that got into the groundwater. The Department is clarifying that this air stripper tower system also handles the waste water from the solvent recovery system (AC 06-170598). The UTM coordinates of this plant are Zone 17, 585.2 km E and 2904.3 km N. The application was considered complete on receipt.

C. Process

The air stripper will process approximately 11.6 million gallons of contaminated water containing 8,370 pounds of toluene, 84 pounds of benzene, 84 pounds of ethyl benzene, and 84 pounds of toluene. 18 GPM of contaminated ground water, which includes toluene from the recent spill and 4 GPM contaminated water from the solvent recovery system condenser, are pumped to a 28.3 foot high air stripper (packed column). Air is blown into the bottom of the column at a 1,060 ACFM rate. It flows up the column countercurrent to the contaminated water flow. The air and organic vapors pass through a mist eliminator at the top of the column to the atmosphere. An estimated 99+% of the organic solvents in the contaminated water evaporate into the air stream and are discharged to the ambient air. The treated water is discharged to the municipal sewer systems.

D. Emissions

Using the procedure outlined in the Department's October 20, 1987, memorandum, the applicant estimated the emissions and ambient air impact of the air stripper tower system. The emissions are shown in the following tables:

GROUNDWATER

<u>Pollutant</u>	<u>Max. Emissions</u> <u>lbs/hr</u>	<u>Average Emissions</u> <u>TPY</u>
Benzene	0.002	0.010
Ethyl Benzene	0.002	0.010
Toluene	0.234	1.027
Xylene	0.002	0.010

SOLVENT RECOVERY SYSTEM

<u>Pollutant</u>	<u>Max. Emissions</u> <u>lbs/hr</u>	<u>Average Emissions</u> <u>TPY</u>
Benzene	0.007	0.032
Ethyl Benzene	0.007	0.032
Toluene	0.721	3.158
Xylene	0.007	0.032

TOTAL AIR STRIPPER EMISSIONS

<u>Pollutant</u>	<u>Max. Emissions</u> <u>lbs/hr</u>	<u>Average Emissions</u> <u>TPY</u>
Benzene	0.01	0.042
Ethyl Benzene	0.01	0.042
Toluene	0.955	4.185
Xylene	0.01	0.042
Total BTEX*	0.985	4.311

*Benzene, toluene, ethyl benzene, and xylene.

This is a 0.98 TPY VOC increase above current permitted emissions.

The estimated impacts of these emissions do not exceed the Acceptable Ambient Concentrations.

II. Rule Applicability

The proposed project, modification of an air stripper tower system for contaminated groundwater and solvent recovery system waste water, is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapters 17-210, 17-212, 17-272, 17-296, and 17-297, Florida Administrative Code (F.A.C.).

The plant is in an area designated nonattainment for ozone (F.A.C. Rule 17-275.410) and attainment for the other criteria pollutants (F.A.C. Rule 17-275.400).

The facility is a minor source of volatile organic compounds (VOC). The proposed project is not subject to the preconstruction review requirements of F.A.C. Rule 17-212.500, New Source Review for Nonattainment Areas, because it will not result in a major emissions increase of VOC.

The project is subject to F.A.C. Rule 17-212.300 which pertains to sources not subject to prevention of significant deterioration or nonattainment review. There is no applicable reasonably available control technology standard for this operation. The source shall comply with F.A.C. Rule 17-296.320, General Pollutant Emission Limiting Standards. The allowable VOC emissions will be set at the rates estimated by the applicant. Higher emissions could subject the project to additional regulations.

III. Technical Evaluation

Based on the Department's October 20, 1987, memorandum on air stripper operations, air stripper towers typically remove 95-99% of the VOC from the contaminated water. From an analysis of the contaminated water and its volumetric flow through the tower, the BTEX emissions were estimated for the proposed source. The maximum concentration of these pollutants in the ambient air, knowing the emissions and stack parameters, can be estimated using EPA's Screening Model. These calculations were done for the proposed project and the results show the impact from this source will be well below the acceptable ambient air concentrations.

IV. Ambient Air Impact

Based on the modeled impact of the estimated emissions of the BTEX compounds from the proposed source, the operation of the air stripper tower system will not create a health hazard or cause/contribute to an ambient air quality violation.

V. Conclusion

Based on the information provided by Sun Graphic, Inc., the Department has reasonable assurance that the proposed construction/modification of air stripper tower system, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, or any other technical provision of Chapters 17-212 of the Florida Administrative Code.





Florida Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE:
Sun Graphic, Inc.
1820 NW 21st Street
Pompano Beach, Florida 33060

Permit Number: AC 06-233501
Expiration Date: March 1, 1994
County: Broward
Latitude/Longitude: 26°15'26"N
80°08'49"W

Project: Air Stripper Tower
System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-210, 17-212, 17-272, 17-296, 17-297, and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction (modification) of a 99+% efficient contaminated water (18 GPM groundwater and 4 GPM solvent recovery system wastewater) air stripper system consisting of a shallow well, collection tank, piping, tower feed pump (22 GPM total), 28.3 ft. (min) high air stripper tower (1.5 ft. diameter packed column containing 22 ft. of packing), mist eliminator, air blower (1,060 ACFM), and a biocide feeder. The air stripper system will be located at the permittee's existing lithographic blanket manufacturing plant in Pompano Beach, Broward County, Florida.

The UTM coordinates of this site are Zone 17, 585.2 km E and 2904.3 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received June 14, 1993.

PERMITTEE:
Sun Graphic, Inc.

Permit Number: AC 06-233501
Expiration Date: March 1, 1994

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 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department 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 Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, 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 Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement 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 Department rules, unless specifically authorized by an order from the Department.

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 Department 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 Department rules.

PERMITTEE:
Sun Graphic, Inc.

Permit Number: AC 06-233501
Expiration Date: March 1, 1994

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, 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 Department 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 this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

PERMITTEE:
Sun Graphic, Inc.

Permit Number: AC 06-233501
Expiration Date: March 1, 1994

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

PERMITTEE:
Sun Graphic, Inc.

Permit Number: AC 06-233501
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

1. The contaminated water flow to the air stripper column shall not exceed 18 GPM of groundwater and 4 GPM of solvent recovery system (SRS) wastewater for a total flow of 22 GPM. The permittee shall check the flow rate to the column (stripper) at least once during each normal business day that the system is in operation.

2. The concentration of toluene in the contaminated ground water shall not exceed 370,000 ug/l. The concentration of toluene in the SRS wastewater shall not exceed 260,000 ug/l. The influent and effluent from the air stripper shall be tested for the BTEX compounds every month by Methods 5030/8020 or other methods with the approval of the Department.

3. Based on the procedures described in the Department's October 20, 1987, memorandum titled Final Air Stripper Review Procedure, or other methods with prior approval of the Department, the emissions from the air stripper system shall not exceed:

Pollutant	Maximum Emissions	
	lbs/hr	TPY (Avg)
Toluene	0.96	4.2
Benzene	0.010	0.042
Ethyl Benzene	0.010	0.042
Xylene	0.010	0.042

The Department may require analysis of the ground water for any suspected compound it has good reason to believe is being emitted in excess of the quantities listed in the application.

4. The air stripper system may operate continuously, 8760 hrs/yr.

5. The air stripper column system shall not discharge air pollutants in quantities that cause or contribute to objectionable odors.

6. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

PERMITTEE:
Sun Graphic, Inc.

Permit Number: AC 06-233501
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

7. A request to modify the operation permit must be submitted to the Southeast District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for a modification, the applicant shall submit a written request for a modification, fee, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this _____ day
of _____, 1993

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Howard L. Rhodes, Director
Division of Air Resources
Management



6821 S.W. Archer Road
Gainesville, FL 32608
TEL (904) 371-9451
FAX (904) 378-1500

July 14, 1993
B-2253

RECEIVED
JUL 21 1993
Division of Air
Resources Management

Mr. Willard Hanks
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Sun Graphic, Inc. (SUN)
Permit No. AC-06-170598

Dear Willard:

This letter is submitted in response to your July 7th letter concerning the requested permit change as to Lactol usage.

Basically, SUN would like to simplify things by changing the specific permit condition #12 from:

<u>SOLVENTS</u>	<u>GALLONS/MONTH</u>	<u>GPY</u>
Toluene (including cleanup solvents)	17,917	215,000
Lactol	100	1,200

to:

<u>SOLVENTS</u>	<u>GALLONS/MONTH</u>	<u>GPY</u>
Toluene and Lactol (including cleanup solvents)	18,017	216,200

This approach will not increase permitted emission rates and will keep the total number of gallons of solvents the same.

Alternatively, following your suggestion, SUN would be willing to reduce the VOC emissions in other process areas to allow for the increase in Lactol emissions. I have attached my handwritten changes to the table from your technical determination. The estimated emission reductions come from the use of a low-solvent adhesive coating for the "sticky back" operation and the spreader operations.



QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

9854715835

31104

9854715835

RECIPIENT'S COPY

From (Your Name) Please Print EANNE DORSEY		Your Phone Number (Very Important) (904) 372-1500		To (Recipient's Name) Please Print Mr. Willard Hanks		Recipient's Phone Number (Very Important) (904) 488-1344			
Company ATER & AIR RESEARCH INC		Department/Floor No.		Company FDER- Twin Towers Office Building		Department/Floor No.			
Street Address 821 SW ARCHER RD				Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) 2600 Blair Stone Road					
City AINESVILLE		State FL		City Tallahassee		State FL			
ZIP Required 3 2 6 0 8		ZIP Required 3 2 3 9 9 - 2 4 0 0		IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address City State ZIP Required					
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on Invoice.) B-2253									
PAYMENT <input checked="" type="checkbox"/> Bill Sender <input type="checkbox"/> Bill Recipient's FedEx Acct. No. <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. <input type="checkbox"/> Bill Credit Card				City State ZIP Required					
<input type="checkbox"/> Cash/Check									
4 SERVICES (Check only one box)		5 DELIVERY AND SPECIAL HANDLING (Check services required)		6 PACKAGES		WEIGHT In Pounds Only			
Priority Overnight (Delivery by next business morning) 11 <input type="checkbox"/> OTHER PACKAGING 16 <input type="checkbox"/> FEDEX LETTER* 12 <input type="checkbox"/> FEDEX PAK* 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE Economy Two-Day (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY* *Economy Letter rate not available. Minimum charge: One pound economy rate.		Standard Overnight (Delivery by next business afternoon. No Saturday delivery) 51 <input type="checkbox"/> OTHER PACKAGING 56 <input type="checkbox"/> FEDEX LETTER* 52 <input type="checkbox"/> FEDEX PAK* 53 <input type="checkbox"/> FEDEX BOX 54 <input type="checkbox"/> FEDEX TUBE Government Overnight (Restricted for authorized users only) 46 <input type="checkbox"/> GOVT LETTER 41 <input type="checkbox"/> GOVT PACKAGE Freight Service (for packages over 150 lbs.) 70 <input type="checkbox"/> OVERNIGHT FREIGHT** (Confirmed reservation required) 80 <input type="checkbox"/> TWO-DAY FREIGHT** **Declared Value Limit \$500. Call for delivery schedule.		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box H) 2 <input type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE Dangerous Goods Shipper's Declaration not required Dry Ice: 9 UN 1845, _____ X _____ kg, 904 III 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)		DIM SHIPMENT (Chargeable Weight) _____ lbs. L x W x H _____ x _____ x _____ Received At 1 <input type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input type="checkbox"/> On-Call Stop 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station		Emp. No. _____ Date _____ Federal Express Use <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold Street Address _____ City _____ State _____ Zip _____ Received By: _____ X Date/Time Received _____ FedEx Employee Number _____ REVISION DATE 11/92 PART #137204 FXEM 3/93 FORMAT #155 <div style="border: 1px solid black; padding: 2px; display: inline-block;">155</div> © 1992-93 FEDEX PRINTED IN U.S.A.	

Mr. Willard Hanks
July 14, 1993
Page 2

The problems with the alternative approach are:

- 1) The table, as originally presented in the permit application, estimated the distribution of the emissions by process equipment. The actual distribution was meant to be somewhat flexible since they were estimates while keeping the "bottom line" of total emissions as a suggested permit limit for VOC emissions.
- 2) Knowing that the table contains estimates and are not exact distributions of VOC emissions, I believe it is inappropriate to make the attached changes as if they are exact emission data.

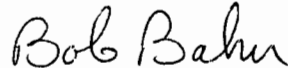
However, the first solution suggested is rather simple. Combining the Toluene and Lactol usages is only a minor permit change with no increase in total solvent usage and no increase in VOC emissions.

Therefore, I request that you consider this simple approach for SUN's permit modification.

Please let me know if you have any questions concerning this request.

Sincerely,

BAKER ENVIRONMENTAL ENGINEERING, INC.

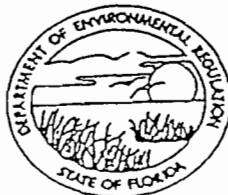


Robert A. Baker, P.E.

RAB:lag

xc: Norm Nichol - Rycoline
David Beresford - Sun Graphic
Jim Crawford - Sun Graphic

DEPARTMENT OF ENVIRONMENTAL REGULATION



APPLICATION TO ~~OPERATE~~/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: AIR STRIPPER [] New¹ [X] Existing¹

APPLICATION TYPE: [] Construction [] Operation [X] Modification

COMPANY NAME: SUN GRAPHIC, INC. COUNTY: BROWARD

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) AIR STRIPPER FOR CONTAMINATED GROUNDWATER

SOURCE LOCATION: Street 1820 N.W. 21ST STREET City POMPAÑO BEACH

UTM: East (17) 585.200 km North 2,904.300 km

Latitude 26 ° 15 ' 26 "N Longitude 80 ° 08 ' 49 "W

APPLICANT NAME AND TITLE: NORMAN NICHOL, PRESIDENT

APPLICANT ADDRESS: C/O RYCOLINE, INC.; 5540 NORTHWEST HIGHWAY; CHICAGO, ILLINOIS 60630

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of SUN GRAPHIC, INC.

I certify that the statements made in this application for a MODIFICATION permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: [Signature]

NORMAN NICHOL, PRESIDENT Name and Title (Please Type)

Date: 7/7/93 Telephone No. (312) 775-6755

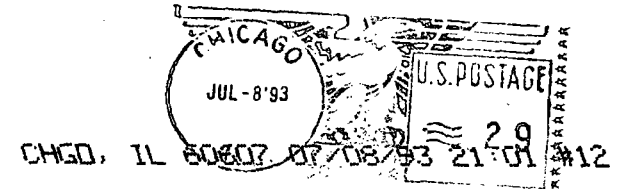
B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

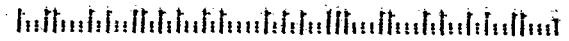


6821 S.W. Archer Road
Gainesville, FL 32608



MR. WILLARD HANKS
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FL 32399-2400

32399-2400 99



**BAKER
ENVIRONMENTAL ENGINEERING, INC.**

6821 S.W. Archer Road
GAINESVILLE, FLORIDA 32608

Phone: (904) 371-9451
Fax: (904) 371-3918

memo

LETTER

Date JUNE 29, 1993

Subject APPLICATION TO CONSTRUCT

To MR. WILLARD HANKS

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

AIR POLLUTION SOURCE - SUN GRAPHIC

PER OUR CONVERSATION OF JUNE 29, 1993 I AM SUBMITTING AN ADDITIONAL SIGNATURE SHEET FROM
MR. NORMAN NICHOL FOR THE ABOVE-REFERENCED APPLICATION.

IF YOU HAVE ANY FURTHER QUESTIONS OR COMMENTS, PLEASE FEEL FREE TO CONTACT ME.

SINCERELY,

ROBERT A. BAKER, P.E.

Please reply

No reply necessary

SIGNED



6821 S.W. Archer Road
Gainesville, FL 32608
TEL (904) 371-9451
FAX (904) 378-1500

June 17, 1993
B-2253

Mr. Isadore Goldman
Florida Department of
Environmental Regulation
1900 South Congress Avenue
Suite A
West Palm Beach, Florida 34952

RECEIVED
JUL 02 1993

Division of Air
Resources Management

PERMITTED
JUN 30 1993

Dept. of Environmental Reg.
West Palm Beach

RE: Sun Graphic, Inc.
Application to Construct Air Pollution Sources
Air Stripper

Dear Mr. Goldman:

Attached are two (2) copies of a revised application for the recently submitted permit modification. The revisions are basically clarifications as to the separate input streams to the air stripper, separate emission rates per stream, and air toxic review based on total emissions.

The revisions are as follows:

- (1) Page 4A, 4B, and 4C replaces Page 4.
- (2) Revised last page of Attachment 2 - Process Description.
- (3) Revised Table 2 of Attachment 3 - Air Toxic Modeling Results.

Please let me know if you have any questions or comments concerning these revisions.

Sincerely,

BAKER ENVIRONMENTAL ENGINEERING, INC.

Robert A. Baker, P.E.

RAB:led

Attachments

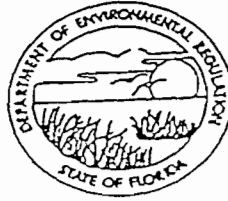
xc: Mr. David Beresford - Sun Graphic, Inc.
Mr. Jim Crawford - Sun Graphic, Inc.
Mr. Norman Nichol - Rycoline, Inc.
Mr. Willard Hanks - FDER, Tallahassee

6-21-93 AC 06-231892 (231892)
Patty,

The District (SFD) is understaffed.
We probably should process this
application here. Can you retrieve
it from the District?

Wad

DEPARTMENT OF ENVIRONMENTAL REGULATION



RECEIVED

JUN 30 1993

Dept. of Environmental Reg.
West Palm Beach

APPLICATION TO ~~OPERATE~~ CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: AIR STRIPPER [] New¹ [X] Existing¹

APPLICATION TYPE: [] Construction [] Operation [X] Modification

COMPANY NAME: SUN GRAPHIC, INC. COUNTY: BROWARD

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) AIR STRIPPER FOR CONTAMINATED GROUNDWATER

SOURCE LOCATION: Street 1820 N.W. 21ST STREET City POMPAÑO BEACH

UTM: East (17) 585.200 km North 2,904.300 km

Latitude 26 ° 15 ' 26 "N Longitude 80 ° 08 ' 49 "W

APPLICANT NAME AND TITLE: NORMAN NICHOL, PRESIDENT

APPLICANT ADDRESS: C/O RYCOLINE, INC.; 5540 NORTHWEST HIGHWAY; CHICAGO, ILLINOIS 60630

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of SUN GRAPHIC, INC.

I certify that the statements made in this application for a MODIFICATION permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: [Signature]

NORMAN NICHOL, PRESIDENT
Name and Title (Please Type)

Date: 6/23/93 Telephone No. (312) 775-6755

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed Robert A. Baker

ROBERT A. BAKER

Name (Please Type)

BAKER ENVIRONMENTAL ENGINEERING, INC.

Company Name (Please Type)

6821 S.W. ARCHER ROAD, GAINESVILLE, FLORIDA 32608

Mailing Address (Please Type)

Florida Registration No. 21118 Date: 6/17/93 Telephone No. (904) 371-9451

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

(1) TO ADJUST EMISSION RATES TO REFLECT THE IMPACT OF THE MAY 1992 TOLUENE SPILL IN THE AREA OF GROUNDWATER RECOVERY, AND

(2) TO REFLECT THE USE OF THE AIR STRIPPER FOR SRS-RELATED WASTEWATER WITH RELATED EMISSIONS COVERED UNDER PERMIT NO. AC 06-170598 AS MODIFIED FEBRUARY 17, 1993.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction UPON ISSUANCE OF PERMIT Completion of Construction 30 DAYS AFTER PERMIT

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

\$20,000(+) FOR AIR STRIPPER

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

#AO 06-202012 - AIR STRIPPER

#AC 06-170598 - SOLVENT RECOVERY SYSTEM

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wka/yr 52 ;
if power plant, hrs/yr _____; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

- | | |
|---|--------------|
| 1. Is this source in a non-attainment area for a particular pollutant? | <u>YES</u> |
| a. If yes, has "offset" been applied? | <u>NO</u> |
| b. If yes, has "Lowest Achievable Emission Rate" been applied? | <u>NO</u> |
| c. If yes, list non-attainment pollutants. _____ | <u>OZONE</u> |
| 2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. | <u>NO</u> |
| 3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. | <u>NO</u> |
| 4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? | <u>NO</u> |
| 5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? | <u>NO</u> |
| H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? | <u>NO</u> |
| a. If yes, for what pollutants? _____ | |
| b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted. | |

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

- (1) BROWARD COUNTY IS A NON-ATTAINMENT AREA FOR OXIDANTS (OZONE). THE MODIFICATION WILL CONTRIBUTE LESS THAN 1 TON PER YEAR OF ADDITIONAL VOC'S AND THE FACILITY IS LESS THAN 100 TONS PER YEAR TOTAL VOC'S; THEREFORE, OFFSETS AND LAER ARE NOT APPLICABLE.
- (2) BACT IS NOT APPLICABLE TO THE SOURCE SINCE IT IS NOT A PSD SOURCE.

GROUNDWATER ONLY

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
GROUNDWATER	VOC	.0026	9,007 (18 GPM)	SEE FIGURE 1

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): NA
- Product Weight (lbs/hr): NA

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
TOLUENE	0.234	1.027	NA	NA	0.234	1.027	
BENZENE	<0.002	<0.010	NA	NA	<0.002	<0.010	
ETHYLBENZENE	<0.002	<0.010	NA	NA	<0.002	<0.010	
XYLENE	<0.002	<0.010	NA	NA	<0.002	<0.010	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

SRS RELATED ONLY

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
WASTEWATER	VOC	.036	2,002 (4 GPM)	SEE FIGURE 1

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): NA
- Product Weight (lbs/hr): NA

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
TOLUENE	0.721	3.158	NA	NA	0.721	3.158	
BENZENE	<0.007	<0.032	NA	NA	<0.007	<0.037	
ETHYLBENZENE	<0.007	<0.032	NA	NA	<0.007	<0.037	
XYLENE	<0.007	<0.037	NA	NA	<0.007	<0.037	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

TOTAL WASTESTREAM

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
WATER	VOC	.0087	11,009 (22 GPM)	SEE FIGURE 1

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): NA
- Product Weight (lbs/hr): NA

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
TOLUENE	0.955	4.185	NA	NA	0.955	4.185	
BENZENE	<0.01	<0.042	NA	NA	<0.01	<0.042	
ETHYLBENZENE	<0.01	<0.042	NA	NA	<0.01	<0.042	
XYLENE	<0.01	<0.042	NA	NA	<0.01	<0.042	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4) N/A

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels N/A

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating. N/A

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

THE RECOVERED AND DECONTAMINATED WATER WILL BE DISCHARGED TO THE SEWER.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 28.3 ft. Stack Diameter: 1.5 ft.
 Gas Flow Rate: 1,060 ACFM 1,028 DSCFM Gas Exit Temperature: 70 °F.
 Water Vapor Content: 3 % Velocity: 10 FPS

SECTION IV: INCINERATOR INFORMATION
 NOT APPLICABLE

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		06/17/93 Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

EFFLUENT DRAIN TO BROWARD COUNTY SEWER

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS SEE ATTACHMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

- 9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
- 10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY N/A

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

[] Yes [] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

[] Yes [] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- 1. Control Device/System:
- 2. Operating Principles:
- 3. Efficiency:*
- 4. Capital Costs:

*Explain method of determining

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
 - a. (1) Company:
 - (2) Mailing Address:
 - (3) City:
 - (4) State:

¹Explain method of determining efficiency.²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION N/A

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? Yes No
- b. Was instrumentation calibrated in accordance with Department procedures?
 Yes No Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
2. Surface data obtained from (location) _____
3. Upper air (mixing height) data obtained from (location) _____
4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.
2. _____ Modified? If yes, attach description.
3. _____ Modified? If yes, attach description.
4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ₂	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

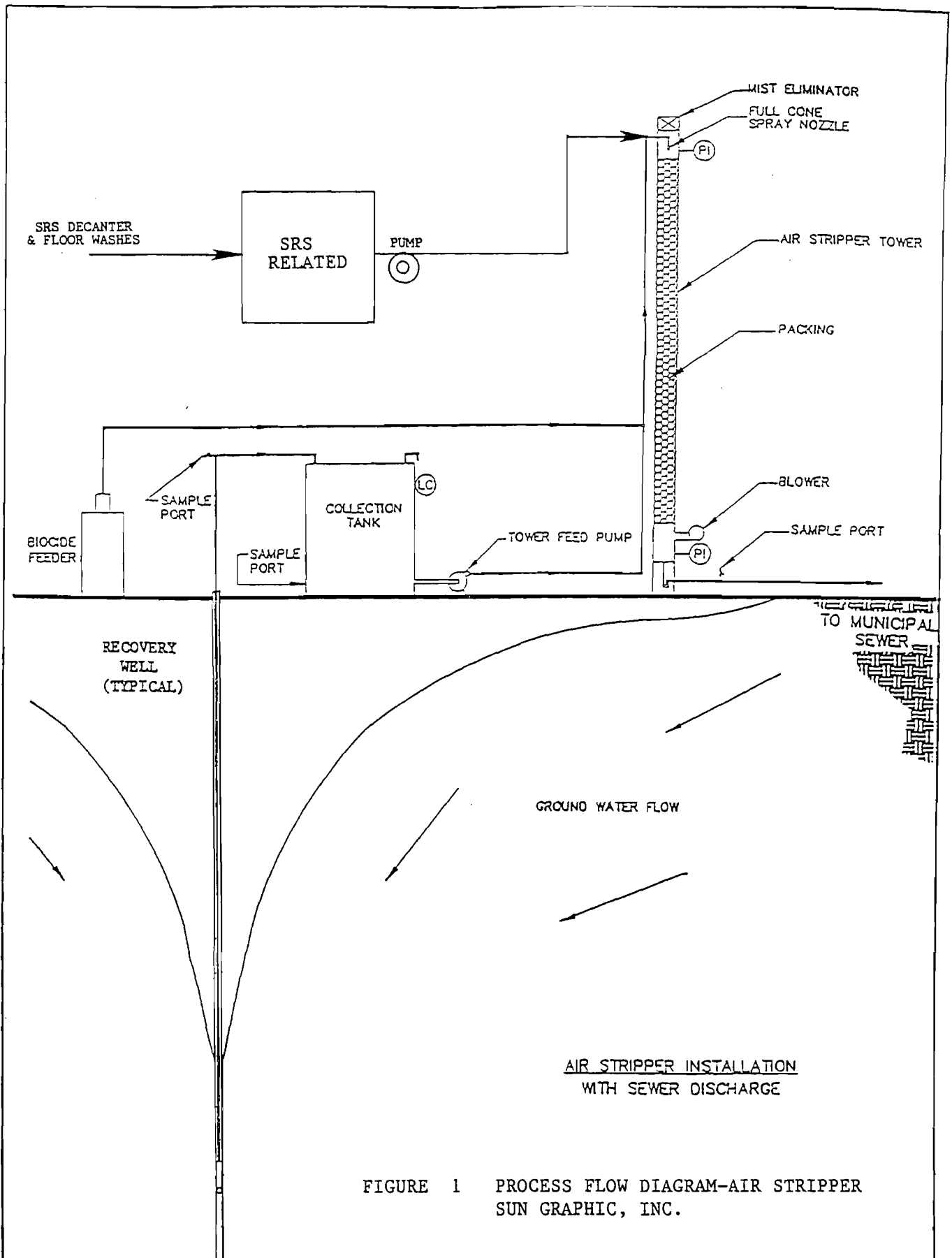


FIGURE 1 PROCESS FLOW DIAGRAM-AIR STRIPPER
SUN GRAPHIC, INC.

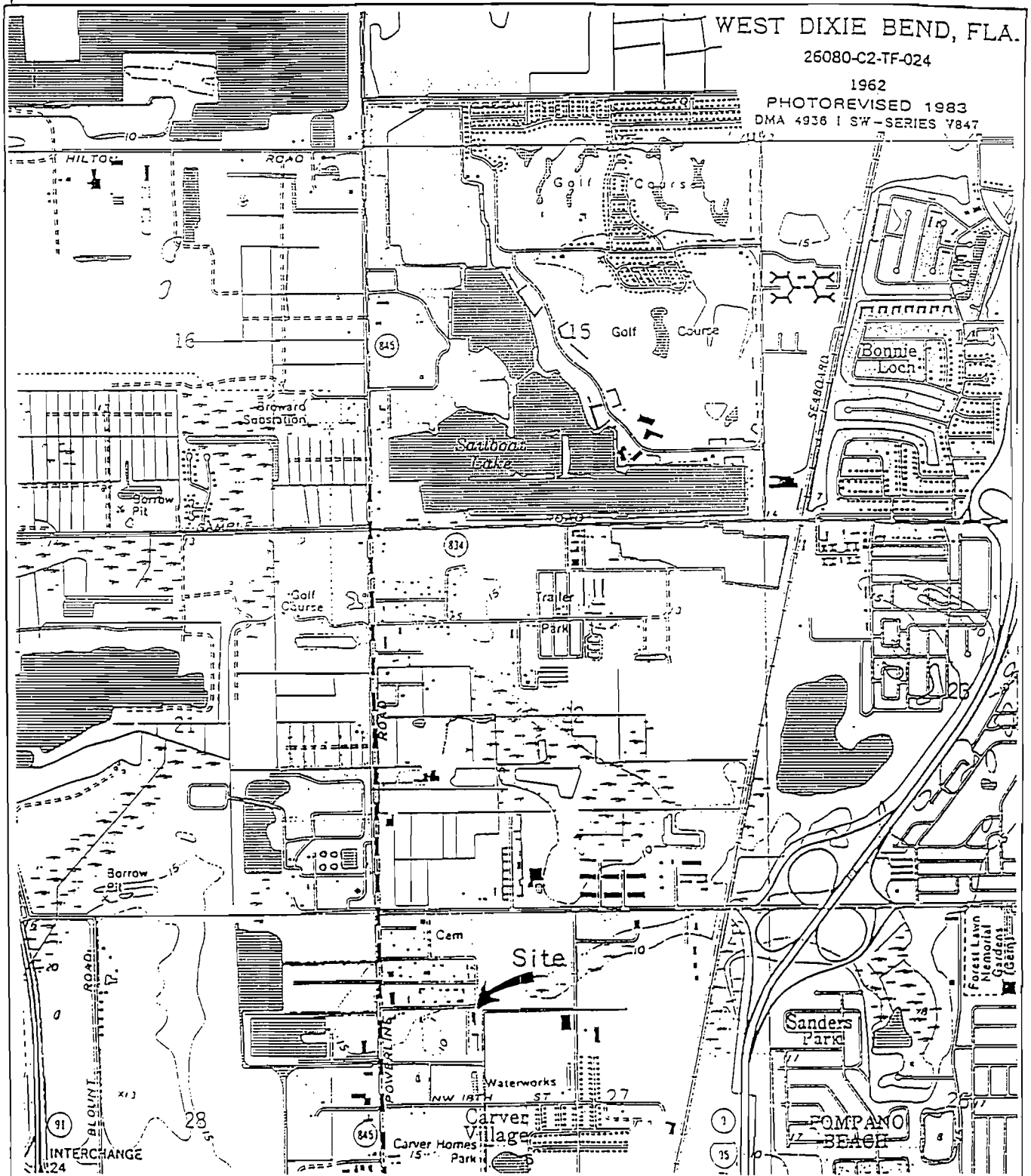
ATTACHMENT 1
SITE LOCATION
AND
PLOT PLAN

WEST DIXIE BEND, FLA.

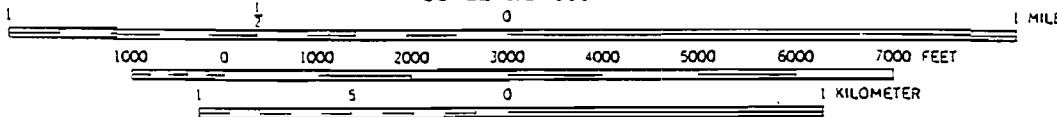
26080-C2-TF-024

1962

PHOTOREVISED 1983
DMA 4936 I SW-SERIES Y847



SCALE 1:24 000

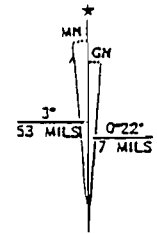


CONTOUR INTERVAL 5 FEET
NATIONAL GEODETTIC VERTICAL DATUM OF 1929



QUADRANGLE LOCATION

FIGURE 2 SITE LOCATION
SUN GRAPHIC, INC.



UTM GRID AND 1983 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

BAKER
ENVIRONMENTAL ENGINEERING, INC.

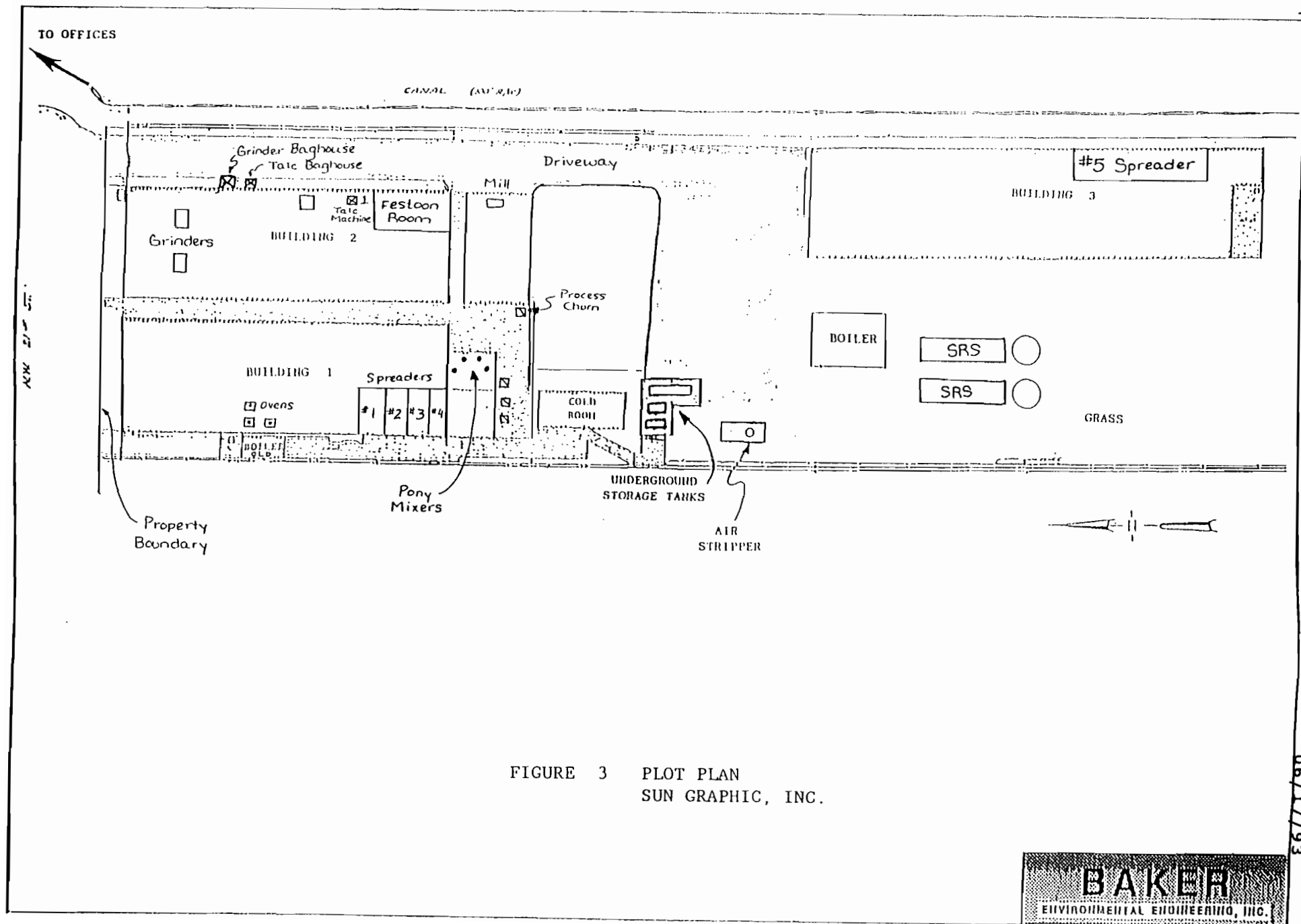


FIGURE 3 PLOT PLAN
SUN GRAPHIC, INC.

06/17/93

ATTACHMENT 2

PROCESS DESCRIPTION

PROCESS DESCRIPTIONOverview

Sun Graphic, Inc. (Sun) operates a groundwater remediation system (air stripper) to recover Toluene in the groundwater. A construction permit was issued on March 12, 1991, with the following emission limits:

<u>POLLUTANT</u>	<u>MAXIMUM (lb/hr)</u>	<u>AVERAGE (TPY)</u>
Toluene	9.26	0.04
Benzene	0.007	0.0004
Ethyl Benzene	0.0242	0.0008
Xylenes	0.0320	0.0004
MEK	0.0014	0.00004

These emission limits were based on groundwater analyses of Toluene as the released solvent and the other compounds (i.e., Benzene, Ethyl Benzene, and Xylenes) as coming from impurities in the Toluene or from small releases of other solvents used (i.e., MEK). The design concentrations of the system were as follows:

<u>PARAMETER</u>	<u>MAXIMUM CONCENTRATION (µg/l)</u>	<u>AVERAGE CONCENTRATION (µg/l)</u>
Toluene	170,000	<1,000
Benzene	138	<10
Ethyl Benzene	438	<20
Xylene	640	<10
MEK	28	<1

The air stripper equipment have the following characteristics:

Pumping Rate	18 GPM
Air Flow	1,060 ACFM
Air Stripper Height	28.3 feet
Packing Height	22 feet
Diameter	1.5 feet
Operating Hours	8,760 hrs/year
Removal Efficiency	>99 percent

The air stripper was anticipated to be in operation over the next five (5) years.

The air emissions, assuming 100% stripping, were calculated in 1991 as follows:

PARAMETER	MAXIMUM		AVERAGE	
	(LB/HR)	(TPY)	(LB/HR)	(TPY)
Toluene	1.532	6.710	0.009	0.0390
Benzene	0.0012	0.005	0.00009	0.00039
Ethyl Benzene	0.0044	0.019	0.00018	0.00079
Xylene	0.0058	0.025	0.00009	0.00039
MEK	0.0003	0.001	0.000009	0.000039

It was expected that after 3 to 6 months of operation, the "average" case would be occurring due to the fact that by this time, the initial slug of contaminants would have passed through the system.

The air stripper was installed in July 1991 and has been operating as designed.

In May 1992, Sun had a Toluene spill consisting of approximately 800 gallons (~2.9 tons) in the same general area as the existing contamination.

The average Toluene concentrations in the groundwater prior to the spill were approximately 1,000 $\mu\text{g/l}$ and approximately 13,000 $\mu\text{g/l}$ during the remainder of 1992 (i.e., after the spill). The highest reading during that year was 21,600 $\mu\text{g/l}$.

Using this highest concentration, plus a slight safety factor (i.e., 26,000 $\mu\text{g/l}$), the new hourly and annual Toluene concentrations are calculated as follows:

$$18 \text{ GPM} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{8.34 \text{ lb}}{\text{gal}} \times \frac{26,000}{10^9} = 0.234 \text{ lb/hr}$$

$$0.234 \text{ lb/hr} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{1 \text{ ton}}{2,000 \text{ lb}} = 1.026 \text{ TPY}$$

Therefore, the VOC emission rate has changed due to the spill as follows:

	TOLUENE		
	(LB/HR)		(TPY)
	MAX	AVG	
Existing Permit	9.26	0.009	0.04
Estimated w/ Spill	<u>0.24</u>	<u><0.24</u>	<u>1.03</u>
Increase	-9.02	<0.231	+0.99

It is expected that the higher VOC emission rate should last from 3 to 5 years.

Also, in early 1993, the Solvent Recovery System (SRS) was installed at Sun. The SRS' permit allowed for 0.75 lb/hr and 3.29 TPY of VOC's from an air stripper serving the SRS's wastewater streams (condensate and floor drains).

Instead of installing a separate air stripper, the existing air stripper was plumbed to take the additional 4-GPM wastewater stream. Overall, the current air stripper has the following estimated VOC emissions:

	<u>TOLUENE</u> ($\mu\text{g/l}$)	<u>FLOW</u> (GPM)	<u>EMISSIONS</u>	
			(LB/HR)	(TPY)
Air Stripper	26,000	18	0.23	1.03
<u>SRS</u>	<u>360,000</u>	<u>4</u>	<u>0.72</u>	<u>3.16</u>
Total:	86,727*	22	0.95	4.19

* weighted average

The VOC emissions from the SRS are allocated in the modified construction permit #AC 06-170598. Therefore, this permit modification is to:

1. Change the allowable groundwater remediation emissions of Toluene from 9.26 to 0.23 lb/hr and from 0.04 to 1.03 TPY.
2. Change the description of the air stripper to recognize the SRS wastewater and related emissions through the same point source.

ATTACHMENT 3

AIR TOXIC MODELING RESULTS

AIR TOXICS

In order to evaluate any toxic effect of a specific compound, a Screen Drift Model was executed using a 1-lb/hr emission rate and the air stripper's characteristics. The maximum 1-hour concentration calculated by the model was 107.8 $\mu\text{g}/\text{m}^3$. This result was then scaled for each contaminant and converted to an 8-hour, 24-hour, and annual concentration using the following EPA model conversion factor:

8-hour	=	0.7 x 1 hour
24-hour	=	0.4 x 1 hour
Annual	=	0.1 x 1 hour

Table 2 summarizes these results. All four (4) compounds were found to be within the calculated no threat levels.

TABLE 2

AIR TOXIC EMISSIONS
SUN GRAPHIC, INC. - AIR STRIPPER

CAT	No Threat Levels ($\mu\text{g}/\text{m}^3$)			Worst Case Model Results ($\mu\text{g}/\text{m}^3$)*			
	8-hr	24-hr	Annual	8-hr	24-hr	Annual	
Toluene	B	7,500	1,786	2,000	72.1	41.2	10.30
Benzene	A	30	7.2	0.12	.7	0.4	0.1
Ethyl Benzene	A	4,350	1,036	--	.7	0.4	0.1
Xylene	A	4,350	1,036	300	.7	0.4	0.1

Notes:

	<u>Groundwater</u>	<u>SRS</u>	<u>Total</u>
*Based on:			
Toluene (lb/hr)	0.234	0.721	0.955
Benzene (lb/hr)	0.002	0.007	0.010
Ethyl Benzene (lb/hr)	0.002	0.007	0.010
Xylene (lb/hr)	0.002	0.007	0.010

Model conversion factors:

8-hour	=	0.7
24-hour	=	0.4
Annual	=	0.1

(Note: Model results were maximum of $107.8 \mu\text{g}/\text{m}^3$ for 1 lb/hr).

Example:

$$\text{Toluene annual level} = 107.8 \mu\text{g}/\text{m}^3 \times 0.955 \text{ lb/hr} \times 0.1 = 10.30 \mu\text{g}/\text{m}^3$$

ATTACHMENT 4
AIR STRIPPER DATA

PART 1 AIR STRIPPER

INPUTS:	SRS:	RAP:	FLOOR:	TOTAL:
HRS/DAY	24	24	1	
DAYS/WK	7	7	7	
HRS/YR	8760	8760	365	8760
GPM	4	18	0	22
GPY	2102285	9460282	0	11562566
UG/L TOL	360000	26000	10000	86727
P atm	1			
TEMP	70 oF			

ASSUME: BENZENE, ETHYLBENZENE AND XYLENES CONCENTRATIONS = 1% OF TOLUENE

OUTPUTS: TEMP 294.3 oK

AIR STRIPPER'S INLET					AIR STRIPPER	
	MW	LB/HR	TPY	PPMv	% REMOVED	(LB/HR)
BENZENE	867	84.16	0.0096	0.0418	100	0.0096
TOLUENE	86727	92.14	0.9554	4.1848	100	0.9554
ETHYLBEN.	867	116.25	0.0096	0.0418	100	0.0096
XYLENES	867	106.17	0.0096	0.0418	100	0.0096
MTBE	0	88.05	0.0000	0.0000	75	0.0000
NAPS	0	128.17	0.0000	0.0000	75	0.0000
PHENOLS	0	94.11	0.0000	0.0000	10	0.0000
BTEX	89329	0.9841	4.3104			0.9841
VOC	89329.09	0.9841	4.3104			0.9841

PART 2 MODELING INPUTS

	INPUT	X FACTOR	OUTPUT
EMISSION RATE	1 LB/HR	0.125997	0.125997 G/S
STACK HEIGHT	28.3 FT	0.3048	8.62584 M
STACK DIA	18 IN	0.0254	0.4572 M
STACK FLOW	1060.0 ACFM	0.000472	0.50032 CUBIC M/S
VELOCITY	***** 600 FPM	0.00508	3.047166 M/S
STACK TEMP	70 oF (5/9(oF-32))+273.15		294 oK
AMB TEMP	70 oF (5/9(oF-32))+273.15		294 oK
RECEPTOR HEIGHT	0 FT	0.3048	0 M
BLD. HT	10 FT	0.3048	3.048 M
BLD WIDTH	10 FT	0.3048	3.048 M
BLD DEPTH	10 FT	0.3048	3.048 M
CONC***	0.000015 LBS/CF	1.6E+10	251572.3 UG/M3

PART 3 MODELING RESULTS:

INPUT	1 LB/HR	
1 HR OUTPUT	107.8 UG/M3	
		1 HR x .7 = 8 HR
		1 HR x .4 = 24 HR
		1 HR x .1 = ANNUAL

	NO THREAT LEVELS (UG/M3)			CALCULATED CONCENTRATIONS		
	8 HR	24 HR	ANNUAL	8 HR	24 HR	ANNUAL
BENZENE	30	7.2	0.12	0.7	0.4	0.10
TOLUENE	3750	900	375	72.1	41.2	10.30
ETHYLBEN.	4350	1044	435	0.7	0.4	0.10
XYLENES	4350	1044	435	0.7	0.4	0.10

*** SCREEN-1.1 MODEL RUN ***
*** VERSION DATED 88300 ***

Sun Graphic Air Stripper

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = .1260
STACK HEIGHT (M) = 8.63
STK INSIDE DIAM (M) = .46
STK EXIT VELOCITY (M/S) = 3.05
STK GAS EXIT TEMP (K) = 294.00
AMBIENT AIR TEMP (K) = 294.00
RECEPTOR HEIGHT (M) = .00
IOPT (1=URB,2=RUR) = 2
BUILDING HEIGHT (M) = 3.05
MIN HORIZ BLDG DIM (M) = 3.05
MAX HORIZ BLDG DIM (M) = 3.05

BUOY. FLUX = .00 M**4/S**3; MOM. FLUX = .49 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
10.	.4890E-04	1	3.0	3.0	960.0	9.6	3.4	1.6	NO
100.	100.3	3	1.0	1.0	320.0	12.8	12.5	7.5	NO
200.	98.30	4	1.0	1.0	320.0	12.8	15.6	8.6	NO
300.	96.03	5	1.0	1.0	5000.0	12.6	16.9	8.8	NO
400.	87.73	6	1.0	1.0	5000.0	12.3	14.7	7.1	NO
500.	92.33	6	1.0	1.0	5000.0	12.3	18.0	8.5	NO
600.	87.74	6	1.0	1.0	5000.0	12.3	21.3	9.8	NO
700.	79.99	6	1.0	1.0	5000.0	12.3	24.5	11.0	NO
800.	71.69	6	1.0	1.0	5000.0	12.3	27.7	12.0	NO
900.	64.18	6	1.0	1.0	5000.0	12.3	30.8	13.0	NO
1000.	57.57	6	1.0	1.0	5000.0	12.3	33.9	14.0	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 10. M:

122.	107.8	3	1.0	1.0	320.0	12.8	15.1	9.1	NO
------	-------	---	-----	-----	-------	------	------	-----	----

DWASH= MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X(3)=LB

*** CAVITY CALCULATION - 1 ***	*** CAVITY CALCULATION - 2 ***
CONC (UG/M**3) = .0000	CONC (UG/M**3) = .0000
CRIT WS @10M (M/S) = 99.99	CRIT WS @10M (M/S) = 99.99
CRIT WS @ HS (M/S) = 99.99	CRIT WS @ HS (M/S) = 99.99
DILUTION WS (M/S) = 99.99	DILUTION WS (M/S) = 99.99
CAVITY HT (M) = 4.38	CAVITY HT (M) = 4.38
CAVITY LENGTH (M) = 4.49	CAVITY LENGTH (M) = 4.49
ALONGWIND DIM (M) = 3.05	ALONGWIND DIM (M) = 3.05

*** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	107.8	122.	0.

** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **

SUN GRAPHIC, INC.
GROUNDWATER HISTORICAL DATA

SUNGW.WK1
04/13/93

WELL #	DATE	BENZENE (ug/l)	TOLUENE (ug/l)	ETHYL BENZENE (ug/l)	TOTAL XYLENE (ug/l)	METHYLETHYL KETONE (MEK) (ug/l)	TOTAL PHENOL (ug/l)	MTBE (ug/l)
SI	06/18/91							
	0 HRS	0.24	<10	<0.07	0.08	NA		
	12 HRS	0.78	25.5	0.2	0.66	NA	10	
	06/19/91					NA		
	24 HRS	<0.3	<10	<0.07	0.67	NA	9	
	36 HRS	<0.3	<10	<0.07	0.28	NA	15	
	06/20/91					NA		
	48 HRS	0.95	1130	0.41	2.66	NA	52	
	60 HRS	<0.3	<10	<0.07	0.03	NA	51	
	06/21/91					NA		
	72 HRS	1.03	611	0.21	2.74	NA	85	
	07/26/91	BDL	BDL	BDL	BDL	NA	NA	
	08/09/91	BDL	4300	BDL	BDL	NA	NA	
	09/04/91	BDL	1460	BDL	13	NA	NA	
	10/03/91	BDL	BDL	BDL	BDL	NA	NA	
	11/21/91	BDL	BDL	BDL	BDL	NA	NA	
	12/18/91	BDL	710	BDL	BDL	NA	NA	
	01/02/92	BDL	1390	BDL	BDL	NA	NA	
	02/18/92	BDL	BDL	BDL	BDL	NA	NA	
	03/12/92	BDL	720	BDL	8	NA	NA	
	04/02/92	0.6	595	1.6	4.8	NA	5	
	05/05/92	BDL	0.8	BDL	BDL	NA		
	06/04/92	BDL	1200	BDL	BDL	NA		
	07/02/92	BDL	370	BDL	BDL	NA		
	08/04/92	BDL	BDL	BDL	0.8	NA	14	
	09/04/92	BDL	10100	BDL	BDL	NA	42	
	10/06/92	BDL	14200	BDL	BDL	NA	130	
	11/06/92	BDL	20000	BDL	BDL	NA	33	
	11/11/92	BDL	21600	BDL	BDL	NA		
	11/17/92	BDL	14000	BDL	BDL	NA		
	11/23/92	BDL	14700	BDL	BDL	NA	NA	
	12/03/92	BDL	16800	BDL	BDL	NA	144	BDL
	12/28/92	BDL	13900	BDL	BDL	NA	NA	BDL
	12/31/92	BDL	8950	BDL	BDL	NA	NA	BDL
	01/06/93	8.7	17000	2.9	14.4		98	1.1
	01/15/93	BDL	11400	BDL	BDL	NA	NA	BDL
	01/21/93	BDL	17700	BDL	1100	NA	NA	BDL
	01/27/93	BDL	13400	BDL	BDL	NA	NA	BDL
	02/11/93	BDL	8000	BDL	BDL	NA	39	BDL
	02/19/93	BDL	9600	BDL	BDL	NA	NA	BDL
	03/01/93	BDL	8300	BDL	BDL	NA	NA	BDL
	03/04/93	BDL	8300	BDL	BDL	NA	NA	BDL
	03/12/93	BDL	9200	BDL	BDL	NA	NA	BDL
	03/17/93	BDL	9100	BDL	BDL	NA	NA	BDL
	03/25/93	BDL	11000	BDL	BDL	NA	NA	BDL



6821 S.W. Archer Road
Gainesville, FL 32608
TEL (904) 371-9451
FAX (904) 378-1500

June 11, 1993
B-2253

RECEIVED
MAIL ROOM
1993 JUN 14 PM 12:05 PM 12:00

Mr. Clair Fancy
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Sun Graphic, Inc.
Permit No. AC06-170598

001031

Dear Clair:

Attached please find a check for \$250.00 for a minor modification to the above-referenced permit and a copy of Sun Graphic's (Sun) letter of June 4, 1993, to Mr. Eric Peterson of your West Palm Beach office.

The modification is to amend Specific Condition #12 to allow for up to 300 gallons per month and 2,400 gallons per year of Lactol while maintaining emissions at the permitted levels (i.e., no increase in emissions). The problem has occurred that the Lactol usages per the permit (i.e., 100 gallons per month and 1,200 gallons per year) are inadequate to cover Sun's current usage rates. In the attached letter, Sun explains the problem to Mr. Peterson.

Sun is reducing and/or eliminating its Lactol usage by replacing the Lactol with a water-based product, where feasible. However, in order to provide some flexibility for operations within permit conditions, the amendment is needed at this time.

As we have discussed in recent meetings and letters about the permit conditions, it would be desirable to allow Sun to manage its use of organics by the monthly and annual emission limitations in the permit with no gallonage restrictions. Specific Condition #12 limits the usage of each organic compound and does not allow for an approach based on trading VOC compounds while not increasing the amount of VOC emissions (i.e., using more Lactol while off-setting with the use of less Toluene).

Several factors to keep in mind while reviewing this request are:

- Part of the Lactol usage is in a nearby area that is not adjacent to, nor contiguous to, the main plant. Emissions from this area should probably be considered as originating from a different facility, but Sun has included these emissions in its permit for the entire plant permit limit of 94.2 tons per year (TPY) of volatile organic carbons (VOCs).

Letter to Mr. Clair Fancy
June 11, 1993
Page 2

- Sun, by reducing or eliminating its usage of Lactol, may have to rely on other VOC compounds. The permit should reflect a usage of "equivalent" VOC compounds.
- Sun's records show that usages of the other VOC compounds in Specific Condition #12 are less than their allowable usage rates and that the plant is meeting its monthly VOC emission limits.

Please consider this request as urgent and let me know if you need any additional information or revised application forms.

Sincerely,

BAKER ENVIRONMENTAL ENGINEERING, INC.



Robert A. Baker, P.E.

RAB:led

Enclosures

xc: Mr. David Beresford - Sun Graphic, Inc.
Mr. Jim Crawford - Sun Graphic, Inc.
Mr. Norman Nichol - Rycoline, Inc.
Mr. Willard Hanks - FDER, Tallahassee
Mr. Eric Peterson - FDER, West Palm Beach

SUN GRAPHIC INC.

PRINTING PRESS BLANKET MFG.



1820 Northwest 21st Street • Pompano Beach, Florida 33069
Phone (305) 974-0217 - 974-0218

June 4, 1993

Eric Peterson
FDER, Southeast District
PO Box 15425
West Palm Beach, FL 33416

Dear Eric:

As you are aware, we use Lactol to inspect our printing blankets before they leave the production area and then again before they are shipped. We have been working very diligently to eliminate the use of Lactol by using water based surfactants but we have run into problems due to the inability to dry the surfactant. As discussed with you, I have purchased a web scrubber drying nozzle to try to dry the surfactants. I have been advised that the blowers for this unit were shipped from Cincinnati yesterday and the nozzles will be shipped today. A copy of the purchase order is attached for your information. I have also let a contract at a cost of \$2700 to add additional electric power in our converting area so that I can test infrared heaters to dry the surfactants from blankets in the converting area.

Per your request our Lactol usage has been as follows:

February	250 gallons
March	275 gallons
April	175 gallons
May	115 gallons

We averaged approximately 280 gallon/month in 1992 per records we have available.

As this decline in Lactol shows, we are making good progress in reducing our Lactol consumption, and by virtually eliminating its use in the near future (by the measures outlined above) still anticipate holding to the 1200 gallons permitted for the year. If our ability to meet this condition becomes unlikely we will advise you to review our options and possibly to amend our permit as allowed for in the latest draft. (Copy attached)

Sincerely,

James E. Crawford
Engineering Manager

SUN GRAPHIC INC.

PRINTING PRESS BLANKET MFG.



1820 Northwest 21st Street • Pompano Beach, Florida 33069
Phone (305) 974-0217 - 974-0218

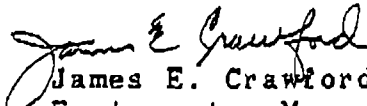
June 9, 1993

Mr. Eric Peterson
FDER Southeast District
1900 S. Congress Ave., Suite A
West Palm Beach, FL 33416

Dear Mr. Peterson:

In response to your letter of May 18, 1993 regarding the Sun Graphic first quarter 1993 VOC emissions report, the attached page provides the additional information you have requested. If you have any questions or require additional data, please advise.

Sincerely,


James E. Crawford
Engineering Manager

cc: Norman Nichol, President
David Beresford, Vice President

6-10

SPECIFIC CONDITION NO. 12

<u>SOLVENTS</u>	<u>PERMIT</u>		<u>ACTUAL GALLONS/MONTH</u>				<u>GPY</u>
	<u>GALLONS/MONTH</u>	<u>CPY</u>	<u>JAN.</u>	<u>FEB.</u>	<u>MARCH</u>		
TOLUENE	17917	215,000	X	10882.9	13639.8	NA	
LACOLENE	100	12000	X	250	275	NA	
STICKY BACK ADHESIVE	343	410	X	137.5	110.0	NA	
EPOXY GLUE	15.42	185	X	3.0	3.5	NA	

SPECIFIC CONDITION NO. 11 i

STICKY BACK ADHESIVE < .5% VOC

TOTAL USAGE FEB = 1125 LB X .005 = 5.625 LB OF VOC/MONTH

5.625 LB/MONTH ÷ 39 HOURS APPLICATION TIME = .144 LB/HOUR

TOTAL USAGE MARCH = 900 LB X .005 = 4.5 LB OF VOC/MONTH

4.5 LB/MONTH ÷ 54 HRS APPLICATION TIME = .083 LB/HOUR

SPECIFIC CONDITION NO. 14 E

	<u>JAN.</u>		<u>FEB.</u>		<u>MARCH</u>		<u>ANNUAL</u>
	<u>LBS</u>	<u>TONS</u>	<u>LBS</u>	<u>TONS</u>	<u>LBS</u>	<u>TONS</u>	
STORAGE TANKS	X	X	14.44	.007	18.34	.009	NA
AIR STRIPPER	X	X	413.79	.207	455.53	.228	NA
TOTALS				.214		.237	



6821 S.W. Archer Road
Gainesville, FL 32608
TEL (904) 371-9451
FAX (904) 378-1500

June 11, 1993
B-2253

RECEIVED
MAIL ROOM
1993 JUN 14 PM 12:05 PM 12:00

Mr. Clair Fancy
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Sun Graphic, Inc.
Permit No. AC06-170598

001031

Dear Clair:

Attached please find a check for \$250.00 for a minor modification to the above-referenced permit and a copy of Sun Graphic's (Sun) letter of June 4, 1993, to Mr. Eric Peterson of your West Palm Beach office.

The modification is to amend Specific Condition #12 to allow for up to 300 gallons per month and 2,400 gallons per year of Lactol while maintaining emissions at the permitted levels (i.e., no increase in emissions). The problem has occurred that the Lactol usages per the permit (i.e., 100 gallons per month and 1,200 gallons per year) are inadequate to cover Sun's current usage rates. In the attached letter, Sun explains the problem to Mr. Peterson.

Sun is reducing and/or eliminating its Lactol usage by replacing the Lactol with a water-based product, where feasible. However, in order to provide some flexibility for operations within permit conditions, the amendment is needed at this time.

As we have discussed in recent meetings and letters about the permit conditions, it would be desirable to allow Sun to manage its use of organics by the monthly and annual emission limitations in the permit with no gallonage restrictions. Specific Condition #12 limits the usage of each organic

BAKER ENVIRONMENTAL ENGINEERING, INC.		1992
PH. 904-371-9451 FAX 904-378-1500		
6821 S.W. ARCHER RD. GAINESVILLE, FL 32608		63-2/630 Branch 311
PAY TO THE ORDER OF	June 11 1993	\$ 250.00
Florida Department of Environmental Regulation		
Two hundred fifty and 00/100		DOLLARS
FIRST UNION First Union National Bank of Florida Gainesville, Florida 32605		
FOR	Mod. to #AC06-170598	



6821 S.W. Archer Road
Gainesville, FL 32608
TEL (904) 371-9451
FAX (904) 378-1500

May 25, 1993
B-2253

RECEIVED

MAY 27 1993

Division of Air
Resources Management

Mr. Isadore Goldman
Florida Department of
Environmental Regulation
Southeast District
1900 South Congress Avenue
Suite A
West Palm Beach, Florida 33406

RE: Sun Graphic, Inc.
Air Stripper
#AO 06-202012

Dear Mr. Goldman:

Attached please find a request to modify the existing construction permit to:

1. Account for an increase in groundwater Toluene concentrations due to the May 1992 spill.
2. Reference the Solvent Recovery System (SRS) Toluene emissions allowed in permit AC 06-170598 (as modified on February 17, 1993) in the air stripper permit (AO 06-202012).

Overall, I am requesting an increase of approximately one (1) ton per year to treat the groundwater, due directly to the May 1992 spill.

Per Mr. Willard Hanks' request, this application is being submitted to the FDER District office.

Also enclosed is a check for the amount of \$250.00 for filing fees for a minor modification with an increase in emissions.

Sincerely,

BAKER ENVIRONMENTAL ENGINEERING, INC.

Robert A. Baker, P.E.

RAB:led

Attachments

xc: Mr. Jim Crawford - Sun Graphic, Inc.
Mr. David Beresford - Sun Graphic, Inc.
Mr. Norman Nichol - Rycoline, Inc.
Mr. Willard Hanks - FDER, Tallahassee

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Robert A. Baker, P.E.
 Baker Environmental Engineering,
 6821 S.W. Archer Road
 Gainesville, FL 32608

4a. Article Number
 P 230 524 303

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
 5/24/93

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Jeanne Dorsey

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

P 230 524 303

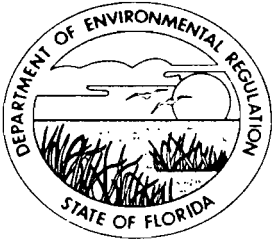


Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail
 (See Reverse)

Sent to Mr. Robert A. Baker, P.E.	
Street and No. 6821 SW Archer Rd.	
P.O., State and ZIP Code Gainesville, FL 32608	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 5-21-93	

PS Form 3800, June 1991



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

May 20, 1993

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Robert A. Baker, P.E.
Baker Environmental Engineering, Inc.
6821 S.W. Archer Road
Gainesville, Florida 32608

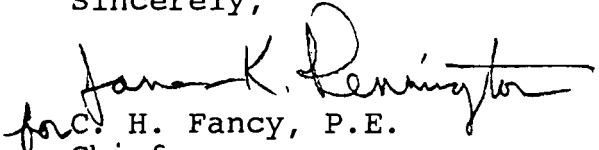
Dear Mr. Baker:

RE: Sun Graphic, Inc., Air Stripper
AC 06-170598 Modification Request

The Bureau of Air Regulation received the above referenced application on May 19, 1993 with no processing fee enclosed. Since the proposed project involves an emission increase of less than five tons per year, the fee for this request is \$250.

We are returning the application with this letter for you to submit, with the correct fee, to the DER Southeast District office in West Palm Beach for processing. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,


for C. H. Fancy, P.E.

Chief
Bureau of Air Regulation

CHF/pa

Enclosure

cc: Isidore Goldman, Southeast District