

FILE



# Department of Environmental Protection

Jeb Bush  
Governor  
June 9, 2003

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

David B. Struhs  
Secretary

Mr. Ron Askin  
V.P. and General Manager  
Sun Graphic, Inc.  
1820 Northwest 21<sup>st</sup> Street  
Pompano Beach, FL 33069

Re: Final National Emission Standards for Hazardous Air Pollutants (NESHAP) -  
Printing, Coating, and Dyeing of Fabrics and Other Textiles

Dear Mr. Askin:

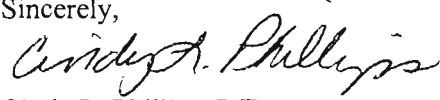
You indicated, in the 112(j) notification that you submitted last year, that your facility would be subject to the NESHAP (40 CFR 63 Subpart OOOO) for Printing, Coating, and Dyeing of Fabrics and Other Textiles. You may be interested in knowing that on May 29, 2003 the USEPA published the final NESHAP for Printing, Coating, and Dyeing of Fabrics and Other Textiles in the Federal Register.

If you are interested in reading the final standards, the NESHAP and a Fact Sheet explaining the standards may be accessed through the USEPA website at <http://www.epa.gov/ttn/atw/fabric/fabricpg.html> . If you do not have access to the Internet, and would like to receive a paper copy of the final standards in the mail, please contact Mr. Bobby Bull at (850) 921-9585 or [Robert.Bull@dep.state.fl.us](mailto:Robert.Bull@dep.state.fl.us) .

The NESHAP compliance date for a Subpart OOOO "existing" affected source is April 29, 2006. "Existing" affected sources include, but are not limited to, affected sources that commenced construction on or before July 11, 2002.

Now that 40 CFR 63 Subpart OOOO for Printing, Coating, and Dyeing of Fabrics and Other Textiles has been promulgated, and based upon your initial 112(j) notification, you will not be required to submit a 112(j) MACT permit application for this source.

If you have any questions concerning this information, please contact me at (850)921-9534 or [Cindy.Phillips@dep.state.fl.us](mailto:Cindy.Phillips@dep.state.fl.us) .

Sincerely,  
  
Cindy L. Phillips, P.E.  
Bureau of Air Regulation

c: Thomas S. Tomascik, PE, Rycoline/Sun Graphic, Inc.  
Daniela Banu, Broward Co. DPEP, Air Quality Division

"More Protection, Less Process"

Printed on recycled paper.



**SUN GRAPHIC INC.**  
PRINTING PRESS BLANKET MFG.

**RECEIVED**

MAY 06 2002

BUREAU OF AIR REGULATION



April 30, 2002

Ms. Cindy Phillips, P.E.  
FDEP Bureau of Air Regulation  
MS 5505  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Mr. Doug Neeley  
Air, Pesticides, and Toxics Management Division  
USEPA Region IV  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

Re: Sun Graphic, Inc.  
Title V Permit# 0112103-002-AV  
112(j) MACT "Hammer" Notification Information

Hello:

Per DPEP's letter of April 5, 2002, this serves as our official 112(j) notification. Our facility (SIC Code 3069) is classified as a major source of hazardous air pollutants. Per our own internal research and correspondence with Seree Jairam of Broward County DPEP and Cindy Phillips (Attachment A) prior to the 5 April issuance of the DPEP letter, we believe our operation is best described under Subpart OOOO - "Printing, Coating & Dyeing of Fabrics", for which a MACT standard has yet to be developed.

We understand that EPA will make the final determination of source category applicability and have provided the following supporting information as requested to aid in the determination.

- (1) The name, address (physical location), and brief description of the major source (facility):

Sun Graphic, Inc.  
1820 NW 21<sup>st</sup> Street  
Pompano Beach, FL 33069

A brief description of the facility, copied from our Title V permit, is provided as Attachment B. Please note that references to remedial processes (marked with a \* ) are no longer applicable. The remedial status of the facility was reclassified to "inactive" by Broward County DPEP on April 9, 2001, subsequent to the issuance of our Title V permit.

Other  
Rycoline Incorporated  
Companies



(2) An identification of the relevant industry type source category:

- Fabric Printing, Coating, and Dyeing

(3) A list of the emission units belonging to the relevant industry type source category:

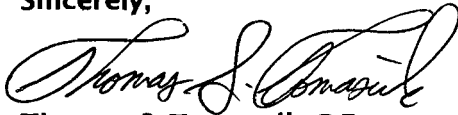
Emission Unit ID 017, as described in Attachment C, taken from our Title V permit belongs to the relevant source category.

(4) An identification of any affected sources for which a section 112(g) MACT determination has been made:

NONE - No new major sources were constructed or reconstructed.

If you have any questions or require additional information, please contact me directly at (954) 974-0217, Ext. 113.

Sincerely,



Thomas S. Tomascik, P.E.  
Corporate EHS Liaison  
Rycoline/Sun Graphic, Inc.



Ron Askin  
V.P. and General Manager  
Title V responsible Official  
Sun Graphic, Inc.

*Attachments*

**Attachment A**  
**Broward County DPEP/FDEP Correspondence**

To: <tom.tomascik@rycoline.com>  
Subject: Fwd: RE: MACT- List SpreadsheetforPotentially Affected Facilities

Tom:

Attached, please find comments from DEP on the MACT for your facility.

Please update me on EPA 's determination.

- Seree Jairam  
Broward County  
954-519-1248

Received: from tlhexsprt2.floridadep.net  
([10.1.23.8])

by co.broward.fl.us; Mon, 15 Apr 2002 12:12:10 -0400

Received: through eSafe SMTP Relay 1018524489; Mon Apr 15 10:55:28 2002

Received: from TLHEXSMB1.floridadep.net ([172.20.30.41]) by tlhexsprt2.floridadep.net with Microsoft SMTPSVC(5.0.2195.2966);  
Mon, 15 Apr 2002 12:12:08 -0400

content-class: urn:content-classes:message

MIME-Version: 1.0

Content-Type: multipart/alternative;

boundary="\_\_\_ = NextPart\_001\_01C1E498.4A456245"

Subject: RE: Draft 112(j) Letter and Mailing List SpreadsheetforPotentially Affected Facilities

X-MimeOLE: Produced By Microsoft Exchange V6.0.5762.3

Date: Mon, 15 Apr 2002 12:12:07 -0400

Message-ID: <66FCD55977925F49A0B23547BBDCC6A1209D9F@TLHEXSMB1.floridadep.net>

X-MS-Has-Attach:

X-MS-TNEF-Correlator:

Thread-Topic: Draft 112(j) Letter and Mailing List SpreadsheetforPotentially Affected Facilities

Thread-Index: AcHgt3As3/F8Di0oRjeB90eFC9t15gD2tZVw

From: "Phillips, Cindy" <Cindy.Phillips@dep.state.fl.us>

To: "SEREE JAIRAM" <SJAIRAM@broward.org>

Return-Path: Cindy.Phillips@dep.state.fl.us

X-OriginalArrivalTime: 15 Apr 2002 16:12:08.0069 (UTC) FILETIME=[4A978350:01C1E498]

Seree, I thought Subpart JJJJ might be applicable because it lists linoleum. Since they are applying the rubber coating to canvas, Subpart OOOO is probably more applicable. Tom

Tomascik of Sun Graphic should talk to EPA directly for additional guidance because he knows their process and I don't.

The EPA contact for the Subpart OOOO, Fabric Printing, Coating & Dyeing, rule development is:

Vinson Helwig  
919-541-2317  
[helwig.vinson@epa.gov](mailto:helwig.vinson@epa.gov)

The EPA contact for the Subpart JJJJ, Paper and Other Web Coating, rule development is:

Paul Almodovar  
919-541-0283  
[almodovar.pau@epa.gov](mailto:almodovar.pau@epa.gov)

When we find facilities that are major sources of HAPs but they don't seem to fit in any source category, we are supposed to notify EPA. EPA will then make a decision as to how to regulate them (e.g., create a new source category).

-Cindy

-----Original Message-----

**From:** SEREE JAIRAM [mailto:SJAIRAM@broward.org]

**Sent:** Wednesday, April 10, 2002 1:45 PM

**To:** Phillips, Cindy

**Subject:** RE: Draft 112(j) Letter and Mailing List SpreadsheetforPotentially Affected Facilities

Cindy;

According to the facility engineer's comments (see attachment) - Subpart OOOO is more applicable.

Please comment.

- Seree Jairam  
Broward County  
954-519-1248

>>> "Phillips, Cindy" <Cindy.Phillips@dep.state.fl.us> 04/01/02 10:52AM >>>

Probably not, but I don't know enough about the facility to determine which category, if either, they would fall into. Do you?

-Cindy

-----Original Message-----

**From:** SEREE JAIRAM [mailto:SJAIRAM@broward.org]

**Sent:** Tuesday, March 26, 2002 11:46 AM

**To:** Phillips, Cindy

**Subject:** Re: Draft 112(j) Letter and Mailing List Spreadsheet for Potentially Affected Facilities

From: Seree Jairam  
Broward County  
954-519-1248

Cindy Phillips:

RE: MACT for the following

BROWARD JJJJ-PAPER & OTHER WEB (SURFACE COATING) 0112103 SUN GRAPHIC  
BROWARD OOOO-FABRIC PRINTING, COATING & DYEING 0112103 SUN GRAPHIC

Would this facility be subjected to 2 MACTS?

Thanks

- Seree

**Attachment B**  
**Title V Facility Description**

## **Section I. Facility Information.**

### **Subsection A. Facility Description.**

Sun Graphic, Inc. manufactures lithographic blankets. Raw rubber is ground and mixed with solvent (mostly toluene) in 5 mixing churns (4 existing and 1 proposed), and/or in 4 pony mixers to create coatings. These coatings are then applied to layers of cloth fabric using knife edges on machines referred to as spreaders. Sun Graphic owns and operates 5 spreaders. Since the process is of a large scale and the facility is permitted to use a maximum of 1,025.64 tons of solvent in coatings per year, considerable amount of solvent is recovered and reused by a Solvent Recovery System (SRS).

The process starts with dry materials being blended in two mixers known as calendar rollers. Each of these mixers vents to its own baghouse which vents to the outside air. The dried material is blended with a solvent in the pony mixers and mixing churns. The 4 pony mixers are in an enclosed room with two general floor sweeps. Exhaust from this room is vented to the SRS. The mixing churns are each individually enclosed which exhaust to the SRS.

Straining of the rubber coatings takes place in a partially enclosed booth that is vented to the SRS. After straining, the blended coatings are moved to a spreader or to a cold storage room which is also vented to the SRS. The blended drums of coatings are covered when not in use, as well as drums of solvent which are also stored in the cold storage room.

The spreaders apply various layers and types of the coatings to the rolls of fabric. In each case the coated fabric is immediately dried in a steam heated portion of the spreader known as the drying oven. The spreaders have been tested and found to have better than 90% hood capture efficiency. Steam is provided to the spreader's drying ovens and to the SRS by a 15 MMBTU/hr boiler which is fueled by natural gas.

Subsequent to building various stages of rubber layers by the spreaders, the coated fabric is fed to a completely enclosed natural gas fired oven for curing. The evaporated solvent is vented to the ambient air. Three ovens currently exist (one of which is a double oven) and three additional curing ovens are planned.

After the rolls of blankets are cured, the top surface is ground for specific properties of thickness and surface conditions. Each roll is inspected visually for imperfections. This inspection process uses solvents and is vented to the ambient air. The blankets are then cut and glued (as needed) onto metal bars. Epoxy glues, lactol, alcohols, edge sealers, and inks are employed at this stage. As the organics released during the gluing operation are not compatible with toluene, these emissions are not recovered.



The #5 spreader also applies an adhesive backing to some of the rolls of lithographic blankets. The operation uses a very low solvent content adhesive and is vented directly to the ambient air, and the facility is well below the applicability threshold for NSPS, Subpart RR.

Scraps of uncured rubber coatings are steam-heated in a process churn to extract and recycle the toluene. This process churn is completely enclosed and is vented to the SRS.

Emptied coating drums are dried in a steam heated oven which is totally enclosed and vented to the SRS.

At least 90% of solvent-laden gases from the churns, process churn, pony mixers, spreaders, and drying ovens are captured and fed to the SRS. The SRS is a vapor phase carbon regenerative system and is designed to recover 98% of the VOCs in the captured inlet gases. Solvent vapors in the captured gases are adsorbed onto activated carbon which is periodically regenerated with low pressure steam. The condensed steam flows to a decanter where two (2) liquid layers form. The top layer is recovered solvent and flows to an underground storage tank. The lower layer is pumped from the decanter to a holding tank where it is aerated prior to final treatment in the air stripper. This holding tank is also vented to the SRS.

\* The facility operates a 99+ percent efficient contaminated groundwater air stripper system consisting of shallow wells, a collection tank, piping, a tower feed pump, a 28.3 ft. high air stripper tower (1.5 ft. diameter packed column containing 22 ft. of packing), a mist eliminator, an 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 volatile organic compounds but treats approximately 18 GPM contaminated groundwater and 4 GPM solvent recovery system wastewater.

A water drain system in the mixing area (by the mixing churns) will produce an average of 1,000 gallons per day of water with less than 10,000 micrograms per liter of toluene. The water will consist of storm water and floor washes that may come in contact with small pieces of rubber coatings which contain toluene and shall be pumped to the air stripper prior to discharge to the sewer.

\* Volatile Organic Compounds that are vacuum-extracted from contaminated soil and aerated from the SRS condensate tank and contaminated groundwater tank, are fed to the SRS.

This facility is separated into three emissions units for ease of reporting and compliance verification. These emissions units are identified in Subsection B.

Also included in this permit are the following insignificant emissions units and/or activities:

One talc machine and one lint/brushing machine each with baghouses discharging indoors.

Based on the initial Title V permit application received June 15, 1996, this facility is a major source of hazardous air pollutants (HAPs).

**Attachment C**  
**Title V Emission Unit Description**

**Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions.**

<u>E.U.</u> <u>I.D. No.</u>	<u>Description</u>
-017	Lithographic Blanket Production Facility (includes 4 pony mixers, 2 dry mixers each with a Torit VS-3000 dust collector; 5 mixing churns (4 existing and 1 proposed); straining operations; 5 spreaders with internal drying ovens; 4 existing and 3 planned curing ovens; cold room and vat storage; grinding operations with a Torit/Day #80 HTP8 Baghouse; inspection, cutting and gluing operations; one steam-heated drum oven; one process churn; adhesive backing application; a solvent recovery system; and three underground storage tanks.)
-018	15 MMBTU/hr Steam Boiler fired by Natural Gas
-019	Air Stripper and Vacuum Extraction Systems -

The facility also operates the following insignificant emission units:

One talc machine and one lint/brushing machine each with baghouses discharging indoors.

**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit, however, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History / ID Number Transfers

These documents are on file with permitting authority:

Initial Title V Permit Application received June 15, 1996.

Approval of Alternative Procedures dated August 21, 1998.