

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD  
JACKSONVILLE, FLORIDA 32207  
(904) 396-6959



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY  
ERNEST E. FREY  
DISTRICT MANAGER

NOTICE OF PERMIT

Mr. William G. Gunther  
Vice President  
Guilford Gravure  
Post Office Box 448  
Guilford, CT 06437

*file*

DER  
JUL 6 1987  
BAQM

Dear Mr. Gunther:

Clay County - AP  
Guilford Gravure  
Rotogravure Packaging Printing Plant

Enclosed is Permit Number A010-114659, dated January 29, 1986, revised April 21, 1986 and June 23, 1986, to operate the subject air pollution source, issued pursuant to Section 403.087, Florida Statutes (F.S.).

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, F.S., to petition for an administrative determination (hearing) on it. The petition for an administrative determination of Chapters 17-103 and 28-5.201, Florida Administrative Code (FAC), and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee 32301, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, F.S.. This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, FAC. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301; 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 the Final Order is filed with the Clerk of the Department.

William G. Gunther  
Guiford Gravure  
Permit No. A010-114659

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

for Frank Wathen Jr  
Ernest E. Frey  
District Manager

WGF  
EEF:jck

Copies furnished to:  
James R. Reid, P.E.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on ~~6/25/86~~ to the listed persons.

6/25/86  
VK

**FILING AND ACKNOWLEDGEMENT**

FILED, on this date, pursuant to S120.52 (9), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

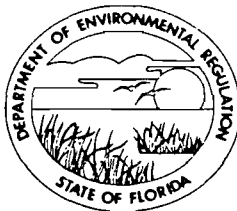
Virginia Kelley 6/25/86  
Clerk Date

6/25/86  
V.K.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD  
JACKSONVILLE, FLORIDA 32207  
(904) 396-6959



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY  
ERNEST E. FREY  
DISTRICT MANAGER

PERMITTEE:	I.D. Number:	31/10/0023/01
Guilford Gravure	Permit/Certification Number:	A010-114659
P. O. Box 448	Date of Issue:	1/29/86; Rev. 4/21/86; Rev. 6/23/86
Guilford, CT 06437	Expiration Date:	January 29, 1991
	County:	Clay
	Latitude/Longitude:	30°00'32"N; 81°41'42"W
	Project:	Rotogravure Packaging Printing Plant
	UTM:	E-(17)433.0; N-3319.8

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the operation of a rotogravure packaging printing plant consisting of a Tea Press, a Seven Color Press, and a Two Color Press. The Tea Press and Seven Color Press dryer heat input rate shall not exceed 3.2 MMBTU/hr. using propane gas. The Two Color Press dryer heat input rate shall not exceed 2.5 MMBTU/hr. using propane gas.

Located at 1272 Harbor Road, Green Cove Springs, Clay County, FL.

In accordance with:

application dated May 30, 1985;  
additional information to BAQM dated July 22, 1985;  
application dated January 10, 1986;  
request to revise dated March 28, 1986;  
Certificate of Completion of Construction dated May 27, 1986

PERMITTEE:  
Guilford Gravure

Permit No.: AO10-114659  
Date of Issue: 1/29/86; Rev. 4/21/86; Rev. 6/23/86  
Expiration Date: January 29, 1991

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
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. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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 at all times 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.
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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

PERMITTEE:  
Guilford Gravure

Permit No.: AO10-114659  
Date of Issue: 1/29/86; Rev. 4/21/86; Rev. 6/23/86  
Expiration Date: January 29, 1991

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

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

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
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.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
13. This permit also constitutes:
  - ( ) Determination of Best Available Control Technology (BACT)
  - ( ) Determination of Prevention of Significant Deterioration (PSD)
  - ( ) Certification of Compliance with State Water Quality Standards  
(Section 401, FL 92-500)
  - ( ) Compliance with New Source Performance Standards

PERMITTEE:  
Guilford Gravure

Permit No.: AO10-114659  
Date of Issue: 1/29/86; Rev. 4/21/86; Rev. 6/23/86  
Expiration Date: January 29, 1991

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.
- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the Department, the permittee shall, within a reasonable period of 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 submitted or corrected promptly.

PERMITTEE:  
Guilford Gravure

Permit No.: A010-114659  
Date of Issue: 1/29/86; Rev. 4/21/86; Rev. 6/23/86  
Expiration Date: January 29, 1991

SPECIFIC CONDITIONS:

1. Compliance shall be achieved by limiting the usage of each of the following materials to the maximum listed:

<u>Material</u>	<u>Maximum lbs/hr</u>	<u>Maximum Volatile Portion(%)</u>
Tea Press: <sup>1</sup>		
press ink	40	85
press solvent	40	100
7 Color Press: <sup>1</sup>		
press ink	80	85
press solvent	112	100
2 Color Press: <sup>1</sup>		
press ink	60	85
press solvent	40	100

<sup>1</sup>For each combination used of any press ink, press ink volatile portion, and press solvent, the resultant VOC emission rate shall not exceed the applicable VOC rate in Specific Condition No. 2.

2. The permitted maximum VOC emissions shall not exceed:

<u>Press</u>	<u>Rule</u>	<u>Lbs/hr</u>	<u>TPY</u>
Tea	17-2.620, FAC	65 <sup>1</sup>	40 <sup>2</sup>
7 Color	17-2.620, FAC	152 <sup>1</sup>	66 <sup>2</sup>
2 Color	17-2.620, FAC	80 <sup>3</sup>	60 <sup>3</sup>

<sup>1</sup>Basis: application and permit issued 10/14/85

<sup>2</sup>Basis: application and permit issued 10/14/85

<sup>3</sup>Basis: application dated May 27, 1986

3. The compliance (annual operation report [AOR]) report shall be due March 1 of each year for the previous calendar year starting March 1, 1986 and shall include:
- Manufacturer specifications data sheet(s) ASTM certified for each material listed in Specific Condition #1.
  - Plant log(s) showing the amount used of each material listed in Specific Condition #1.
  - The AOR form with all applicable data fields completed.

PERMITTEE:  
Guilford Gravure

Permit No.: A010-114659  
Date of Issue: 1/29/86; Rev. 4/21/86; Rev. 6/23/86  
Expiration Date: January 29, 1991

SPECIFIC CONDITIONS:

4. Procedures to minimize VOC emissions shall include, but not limited to:
  - ° Maintain tightly fitting covers, lids, etc. on all containers of VOC when they are not being handled, tapped, etc.;
  - ° Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc. of VOC so that it can be covered when not in use;
  - ° All fittings, valves, lines, etc. shall be properly maintained;
  - ° All VOC spills shall be attended to immediately and the materials properly disposed of, recycled, etc.; and,
  - ° Maintain a monthly accounting of the VOC per type such that the beginning inventory and deliveries are accounted for.
5. There shall be no objectionable odor on off-plant property.
6. The permittee shall investigate and apply the use of low solvent technology for reducing VOC emissions as it becomes available.
7. The permitted maximum emissions from the dryers shall not exceed:

<u>Pollutant</u>	<u>Rule</u>	<u>TPY<sup>1</sup></u>
PM	----	<1
NO <sub>x</sub>	----	<1
VOC	----	<1

<sup>1</sup>Basis: permit issued 10/14/85

8. Combustion product emissions shall be minimized by the use of, but not limited to: hoods, fans, filters and similar equipment to contain and/or vent emissions; maintaining proper burner adjustment to ensure optimum combustion; and periodic maintenance of dryer systems.
9. Visible emissions shall not exceed 20% opacity, using EPA Method 9, Visual Determination of the Opacity for Emissions from Stationary Sources.
10. Compliance with the particulate emission standards will be determined using EPA Method 9.



PERMITTEE:  
Guilford Gravure

Permit No.: A010-114659  
Date of Issue: 1/29/86; Rev. 4/21/86; Rev. 6/23/86  
Expiration Date: January 29, 1991

11. Compliance test shall be performed at 90-100% of the permitted equipment capacity.
12. Test the emission for the following pollutant at the interval indicated from the date of SEE BELOW, notify us 14 days prior to testing, and submit the test report documentation to this office within 45 days after completion of the testing:

<u>Pollutant</u>	<u>Interval</u>
VE	On request

Test and test reports shall comply with the requirements of Florida Administrative Code Rule 17-2.700(6) and (7), respectively.

13. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
14. Forms for renewal will be sent 5 months prior to January 29, 1991 and the completed forms with test results are due 90 days prior to January 29, 1991.

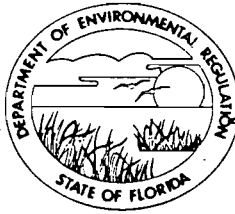
REVISED: April 21, 1986; June 23, 1986

Issued this 29 day of January, 1986

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

*for*   
Ernest E. Frey, District Manager

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION



NORTHEAST DISTRICT

3426 BILLS ROAD  
JACKSONVILLE, FLORIDA 32207  
(904) 396-6959

BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY  
ERNEST E. FREY  
DISTRICT MANAGER

April 21, 1986

Mr. William G. Gunther  
Vice President  
Guilford Gravure  
Post Office Box 448  
Guilford, CT 06437

*fell*

Dear Mr. Gunther:

Clay County - AP  
Guilford Gravure  
Tea Press  
7 Color Press

The Department has received and reviewed the March 28, 1986 request that Specific Condition No. 1 of permit No. A010-114659 be changed.

Specific Condition No. 1 is changed to read as follows:

Compliance shall be achieved by limiting the usage of each of the following materials to the maximums listed:

<u>Material</u>	<u>Maximum lbs/hr.</u>	<u>Maximum Volatile Portion(%)</u>
Tea Press: <sup>1</sup>		
press ink	40	85
press solvent	40	100
7 Color Press: <sup>1</sup>		
press ink	80	85
press solvent	112	100

<sup>1</sup>For each combination used of any press ink, press ink volatile portion, and press solvent, the resultant VOC emission rate shall not exceed the applicable VOC rate in Specific Condition No. 2.

Attachment to be incorporated:

Letter from Robert D. Coleman dated March 28, 1986

This letter and the attachment must be attached to permit No. A010-114659 and shall become a part of that permit.

Sincerely,

Ernest E. Frey  
District Manager

*EEF*  
EEF:jck

cc: Robert D. Coleman

Clay Co. - AD  
Quilford - AP

01-24-86

Called Bob Coleman that another \$100  
is not req'd.

The \$100 w/ the ACP for the existing  
presses will be the total fee since  
the OP will only be modified to add  
the new ones to the OP.

He is to call.

01-27 He called; we discussed above.  
Also, he will send request to ext CP  
to Tal for ext'n of about 3 mo. ~~2~~

04/03 Called Bob C. above CP expiring.  
He said he requested ext in Jan (to  
BA&M). ~~2~~

Clay Co. v AP  
Lufford

05-16-86

Bob Coleman called that will  
request emissions increase in  
ADP of from

1. 65 to 80 lbs/hr and
2. 55 to 60 TPY. *EC*

file



NORTHEAST DISTRICT  
**RECEIVED**  
MAY 28 1986  
**RECEIVED**  
DER-JACKSONVILLE

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
AIR POLLUTION SOURCES  
CERTIFICATE OF COMPLETION OF CONSTRUCTION\*

PERMIT NO. AC10-105002 DATE: 19 May 1986

Company Name: Guilford Gravure County: Clay

Source Identification(s): 31/10/0023/01

Actual costs of serving pollution control purpose: \$ N/A

Operating Rates: (See Attached Sheet) Design Capacity: \_\_\_\_\_

Expected Normal N/A During Compliance Test N/A

Date of Compliance Test: N/A (Attach detailed test report)

Test Results:	Pollutant	Actual Discharge	Allowed Discharge
	<u>N/A</u>	_____	_____
	_____	_____	_____
	_____	_____	_____

Date plant placed in operation: April 11, 1986

This is to certify that, with the exception of deviations noted\*\*, the construction of the project has been completed in accordance with the application to construct and Construction Permit No. AC10-105002 dated Oct. 14, 1985.

A. Applicant:  
William G. Gunther  
Name of Person Signing (Type) William G. Gunther U.P.  
Signature of Owner or Authorized Representative and Title

Date: May 22, 1986 Telephone: 203/453-4334

B. Professional Engineer:  
James R. Reid  
Name of Person Signing (Type) James R. Reid  
Signature of Professional Engineer  
(Independent)  
Company Name Florida Registration No. PE 0019174  
Date: 5-27-86

(Seal)

6746 Winterset Gardens Road, Winter Haven, Fl. 33880  
Mailing Address

(813) 324-0316  
Telephone Number

\*This form, satisfactorily completed, submitted in conjunction with an existing application to construct permit and payment of application processing fee will be accepted in lieu of an application to operate.


\*\*As built, if not built as indicated include process flow sketch, plot plan sketch, and updates of applicable pages of application form.

Clay Co. - AP  
Guilford  
2 color press

06-16-86

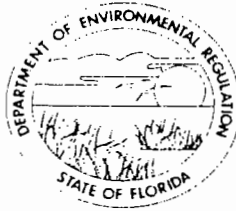
AOP review (cert. of compl. of const.)

			lb/hr	TPY
CP	VOC	emiss rates	65	55
AOP	"	"	80	60
increase	"	"	15	5
Table 500-2	sig rates	VOC	—	40

See 01-24-86 note that OP will be mod'd to add this new press; so no fee req'd. 

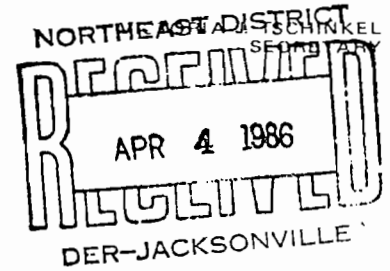
STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



March 27, 1986

BOB GRAHAM  
GOVERNOR



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William G. Gunther  
Vice President  
Guilford Gravure, Inc.  
Post Office Box 448  
Guilford, Connecticut 06437

DER

MAR 31 1986

BAQM

Dear Mr. Gunther:

Re: Extension of Permit No. AC 10-105002  
Rotogravure Printing Presses

The department has received and reviewed your letter dated February 13, 1986, requesting an extension of the expiration date of the above referenced permit.

The department is in agreement with your request and the following changes and additions should be incorporated in the permit.

Expiration Date Change:

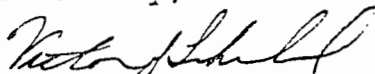
From: April 15, 1986  
To: August 15, 1986

Attachment to be Added:

Letter from Hale and Dorr to Department of Environmental Regulation dated February 13, 1986.

This letter must be attached to your construction permit and shall be made a part of the permit.

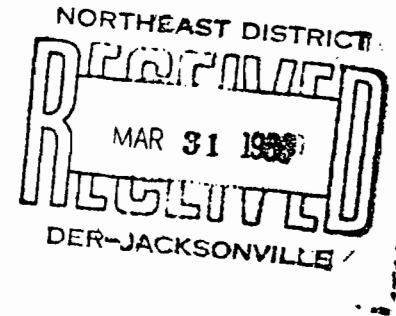
Sincerely,

  
Victoria J. Tschinkel  
Secretary

VJT/ks

cc: Paul Wallach  
Robert Coleman  
Johnny Cole

ROBERT D. COLEMAN  
806 N. Ivy Street  
Arlington, Virginia 22201  
(703) 243-7018



March 28, 1986

FEDERAL EXPRESS

Mr. Johnny Cole  
State of Florida  
Department of Environmental Regulation  
Northeast District  
3426 Bills Road  
Jacksonville, Florida 32207

Re: Guilford Gravure - Operating Permit # A010-114659

Dear Mr. Cole:

During our phone conversation of March 17, 1986 we discussed two important issues concerning the operating permit. These issues related to:

- the addition of Specific Condition #1 into the operating permit; and,
- the requirements of the annual operation report.

I am most concerned about the impact on the plant of the two "maximums" imposed by Specific Condition #1. As I stressed during our conversation, this condition caught us entirely by surprise, as it was neither in the construction permit nor had it been previously discussed.

Specific Condition #1 has two sections. One section limits the amount of ink and solvent which can be used by each press in any one hour. The second section appears to limit the maximum volatile fraction of the ink to the figures we included in the construction permit application as the average levels of volatiles in our inks.



Guilford Gravure feels that the first requirement places an unnecessary restriction on Guilford's maximum production rate at each press since the total ink which can be used (even low or no solvent ink) is limited. Moreover, Specific Condition #2 (which limits hourly emissions) already limits the use of high solvent ink without placing limits on production. The addition of ink use limits in Specific Condition #1 thus seems unnecessary and unfairly restrictive.

The second portion of Specific Condition #1 which limits the maximum volatile fraction of the ink would, I believe, have unintended, unnecessary and extremely negative effects on the plants ability to operate. The listed maximum volatile fractions were taken from the construction permit application where they indicated the average level of volatile in our purchased inks and solvents. Some of the inks we currently use and may use in the future have volatile fractions higher than the average level, up to a level of 83%. In addition, as written, the meaning of "ink" is unclear. For example, a "press mix" which is the mix of ink and solvent actually used on the press can be considered an ink. That press mix can have a volatile fraction of at least 75 wt. percent.

It is also my belief that neither requirement of Specific Condition #1 provides any additional information to the state. Guilford has agreed to keep records (on a monthly basis) of all ink used (on an ink by ink basis) and all solvent used. In addition, it will provide data on the volatile fraction of each ink. Emissions from the plant are the volume of ink purchased times the volatile fraction of the ink plus the solvents purchased. Thus, Specific Condition #1 will not provide any additional information to the state.

Separately, based on our conversations, we are preparing an annual operation report using the "specific acid rain survey forms" mailed to us by Tallahassee. As requested, this "special annual operating report" will be completed by April 1 and sent to Tallahassee with a copy to your attention.

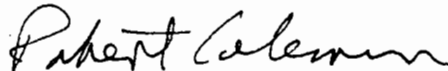
In conclusion, for all the reasons stated above, I would appreciate your immediate attention to our concerns over Specific Condition #1. With respect to the "maximum volatile portion", our concerns could be alleviated if you confirmed that the listed figures for the maximum volatile fraction refer to a maximum annual average. Alternatively, you could either delete Specific Condition #1 in its entirety on the ground that it does not provide any additional information or any additional control, or

Mr. Johnny Cole  
March 28, 1986  
Page 3

change the maximum volatile fraction to reflect what would be on occasion the highest actual maximum of the individual inks (i.e., 85%.

I hope that this letter adequately explains the concerns that I touched on in our initial conversation. Given their importance I would like to discuss these issues with you again after you have had an opportunity to review this letter, and will call you within the next few days. In the meantime, if I can provide any additional information, please do not hesitate to call me.

Sincerely,



Robert D. Coleman

RDC:bas

## PRELIMINARY STATEMENT

The following application seeks a construction permit to allow the addition of a new rotogravure packaging printing press at Guilford Gravure's plant in Green Cove Springs, Florida. The press to be added is a custom designed and manufactured two color press with a 19-1/8" web. The press has not been designed for add-on pollution control equipment nor does standard add-on pollution control exist for this press. The press is being manufactured by George Schmitt Inc., the parent company of Guilford Gravure, specifically for the requirements of the Florida market. The maximum annual ink use in the press will be less than 80,000 lbs per year and maximum VOC emissions will be less than 60 tons/year.

At the same site Guilford Gravure has two other small rotogravure presses. The plant will produce (with the new press in operation) over 6 billion labels a year for the tea and liquor industry. The plant will consume less than 220,000 lbs of ink and less than 220,000 lbs of solvents. Total maximum plant emissions after the addition of the new press will be about 170 tons/year if all presses are operating at maximum capacity.

**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 (MAX)	Relate to Flow Diagram
	Type	% Wt		
Ink	VOC	85	60	
Solvent	VOC	100	40	

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

1. Total Process Input Rate (lbs/hr): N/A

2. Product Weight (lbs/hr): \_\_\_\_\_

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

Name of Contaminant	Emission <sup>1</sup>		Allowed <sup>2</sup> Emission Rate per Rule 17-2	Allowable <sup>3</sup> Emission lbs/hr	Potential <sup>4</sup> Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
VOC	80	60	N/A	80	80	60	Fugitive

<sup>1</sup>See Section V, Item 2.

<sup>2</sup>Reference 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)

<sup>3</sup>Calculated from operating rate and applicable standard.

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

04-01-86

Clay Co. - AP  
Guilford

Tea press

7 color press


Review of 03-28-86  
letter about permit

1. SC # 1 max lbs/hr is from AOP  
~~max~~ volatile portion " " was  
not stated as max or avg


2. SC # 2 from CP

04-03-86

3. If 'press ink' is already diluted w/  
solvent (see March 28, 86 letter) and  
~~some~~ the volatile portion of some  
of the inks is greater ~~than~~ than  
that stated in the AOP, then the  
amt of solvent used must be reduced  
to keep the VOC emission rate less  
than the max rates in SC # 2.

4. Decided to revise SC # 1 to allow <sup>press</sup> inks  
w/ volatile portion max of 85%. Also  
add that ~~the~~ each combination <sup>used</sup> of  
ink, solvent & volatile portion of each shall  
not produce a VOC emission rate <sup>at</sup> exceed  
the VOC rates in SC # 2. 

04-10-86

write letter to change SC # 1. 

## DEPARTMENT OF ENVIRONMENTAL REGULATION

## NORTHEAST DISTRICT

3426 BILLS ROAD  
JACKSONVILLE, FLORIDA 32207  
(904) 396-6959



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

ERNEST E. FREY  
DISTRICT MANAGER

## NOTICE OF PERMIT

*file*

Mr. William G. Gunther  
Vice President  
Guilford Gravure  
Post Office Box 448  
Guilford, CT 06437

Dear Mr. Gunther:

Clay County - AP  
Guilford Gravure  
Rotogravure Packaging Printing Plant

Enclosed is Permit Number A010-114659 to operate a rotogravure packaging printing plant, issued pursuant to Section 403.087, Florida Statutes (F.S.).

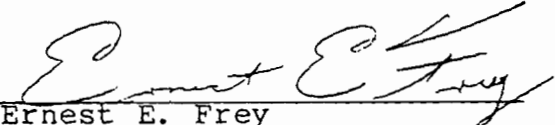
Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, F.S., to petition for an administrative determination (hearing) on it. The petition for an administrative determination of Chapters 17-103 and 28-5.201, Florida Administrative Code (FAC), and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee 32301, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, F.S.. This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, FAC. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301; 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 the Final Order is filed with the Clerk of the Department.

Guilford Gravure  
Permit No. AO10-114659

Executed on this 29 day of January 1986 in Jacksonville,  
Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Ernest E. Frey  
District Manager

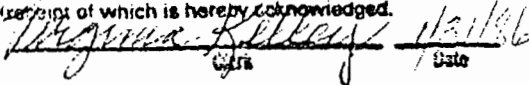
*DPW*  
*113*  
EEF:jck

Copies furnished to:  
Mr. James R. Reid, P.E.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies  
were mailed before the close of business on 1/29/86 to the  
listed persons.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to S120.52 (9), Florida  
Statutes, with the designated Department Clerk,  
receipt of which is hereby acknowledged.

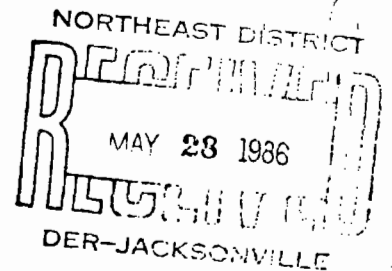
  
\_\_\_\_\_  
Date 1/29/86



# GUILFORD GRAVURE

251 BOSTON POST ROAD P.O. BOX 448 GUILFORD, CONNECTICUT 06437

(203) 453-4334 TELEX: 64-3111



May 23 1986

Mr. Johnny Cole  
State of Florida  
Department of Environmental Regulation  
Northeast District  
3426 Bills Road  
Jacksonville, Florida 32207

Re: Guilford Gravure Permit

Dear Mr. Cole:

It is my understanding that you have recently discussed with Bob Coleman the fact that as constructed, the new rotogravure packaging printing press in our plant in Green Cove Springs, Florida has a 19 inch web (as contrasted to the 16 inch web identified in the construction permit). Because the press has this slightly wider web width, it will have a slightly increased capacity.

As Bob Coleman explained, it is for this reason that Guilford Gravure is requesting that its operating permit conditions reflect this additional capacity. In that regard I have enclosed a Certificate of Completion of Construction as well as the two pages of the permit application which have had to be changed to reflect the increased capacity (i.e., the preliminary statement and page 4).

Please do not hesitate to contact Bob Coleman or myself if you have any questions or need any additional information.

Sincerely,

GUILFORD GRAVURE

William G. Gunther  
Vice President

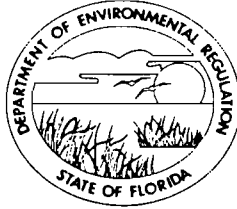
WGG:gv  
Enclosures



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD  
JACKSONVILLE, FLORIDA 32207  
(904) 396-6959



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY  
ERNEST E. FREY  
DISTRICT MANAGER

PERMITTEE:	I.D. Number:	31/10/0023/01
Guilford Gravure	Permit/Certification Number:	A010-114659
P.O. Box 448	Date of Issue:	January 29, 1986
Guilford, CT 06437	Expiration Date:	January 29, 1991
	County:	Clay
	Latitude/Longitude:	30°00'32"N; 81°41'42"W
	Project:	Rotogravure Packaging Printing Plant
	UTM:	E-(17)433.0; N-3319.8

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the operation of a rotogravure packaging printing plant consisting of a Tea press and a seven color press. The heat input rate to the dryer shall not exceed  $3.2 \times 10^6$  MMBTU/hr. using natural gas or propane.

Located at 1272 Harbor Road, Green Cove Springs, Clay County, FL.

In accordance with:

application dated May 30, 1985  
additional information to BAQM dated July 22, 1985  
application dated January 10, 1986.

PERMITTEE:  
Guilford Gravure

Permit No.: A010-114659  
Date of Issue: January 29, 1986  
Expiration Date: January 29, 1991

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
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. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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 at all times 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.
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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

PERMITTEE:  
Guilford Gravure

Permit No.: AO10-114659  
Date of Issue: January 29, 1986  
Expiration Date: January 29, 1991

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:
  - a. a description of and cause of noncompliance; and
  - b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
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.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
13. This permit also constitutes:
  - ( ) Determination of Best Available Control Technology (BACT)
  - ( ) Determination of Prevention of Significant Deterioration (PSD)
  - ( ) Certification of Compliance with State Water Quality Standards  
(Section 401, PL 92-500)
  - ( ) Compliance with New Source Performance Standards

PERMITTEE:  
Guilford Gravure

Permit No.: A010-114659  
Date of Issue: January 29, 1986  
Expiration Date: January 29, 1991

14. The permittee shall comply with the following monitoring and record keeping requirements:
- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.
  - b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
    - the person responsible for performing the analyses;
    - the analytical techniques or methods used; and
    - the results of such analyses.
15. When requested by the Department, the permittee shall, within a reasonable period of 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 submitted or corrected promptly.

PERMITTEE:  
Guilford Gravure

Permit No.: AO10-114659  
Date of Issue: January 29, 1986  
Expiration Date: January 29, 1991

SPECIFIC CONDITIONS:

1. Compliance shall be achieved by limiting the usage of each of the following materials to the maximums listed:

<u>Material</u>	<u>Maximum Lbs/Hr.</u>	<u>Maximum Volatile Portion</u>
Tea Press:		
ink	40	62
solvent	40	100
7 Color Press:		
ink	80	50
solvent	112	100

2. The permitted maximum VOC emissions shall not exceed:

<u>Press</u>	<u>Rule</u>	<u>Lbs/Hr</u>	<u>TPY</u>
Tea	17-2.620, FAC	65 <sup>1</sup>	40 <sup>2</sup>
7 Color	17-2.620, FAC	152 <sup>1</sup>	66 <sup>2</sup>

<sup>1</sup>Basis: application and permit issued 10/14/85

<sup>2</sup>Basis: application and permit issued 10/14/85.

3. The compliance (annual operation report-AOR) report shall be due March 1 of each year for the previous calendar year starting March 1, 1986 and shall include:
- Manufacturer specifications data sheet(s) ASTM certified for each material listed in Specific Condition #1.
  - Plant log(s) showing the amount used of each material listed in Specific Condition #1.
  - The AOR form with all applicable data fields completed.
4. Procedures to minimize VOC emissions shall include, but not limited to:
- ° Maintain tightly fitting covers, lids, etc. on all containers of VOC when they are not being handled, tapped, etc.;
  - ° Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc. of VOC so that it can be covered when not in use;
  - ° All fittings, valves, lines, etc. shall be properly maintained;

PERMITTEE:  
Guilford Gravure

Permit No.: AO10-114659  
Date of Issue: January 29, 1986  
Expiration Date: January 29, 1991

4.
  - ^ All VOC spills shall be attended to immediately and the materials properly disposed of, recycled, etc.; and,
  - ^ Maintain a monthly accounting of the VOC per type such that the beginning inventory and deliveries are accounted for.
5. There shall be no objectionable odor on off-plant property.
6. The permittee shall investigate and apply the use of low solvent technology for reducing VOC emissions as it becomes available.
7. The permitted maximum emissions from the existing dryer shall not exceed:

<u>Pollutant</u>	<u>Rule</u>	<u>TPY<sup>1</sup></u>
PM	---	<1
NO <sub>x</sub>	---	<1
VOC	---	<1

<sup>1</sup>Basis: permit issued 10/14/85

8. Combustion product emissions shall be minimized by the use of, but not limited to: hoods, fans, filters and similar equipment to contain and/or vent emissions; maintaining proper burner adjustment to ensure optimum combustion; and periodic maintenance of dryer systems.
9. Visible emissions shall not exceed 20% opacity, using EPA Method 9, Visual Determination of the Opacity for Emissions from Stationary Sources.
10. Compliance with the particulate emission standards will be determined using EPA Method 9.
11. Compliance tests shall be performed at 90-100% of the permitted equipment capacity.
12. Test the emission for the following pollutant at the interval indicated from the date of SEE BELOW, notify us 14 days prior to testing, and submit the test report documentation to this office within 45 days after completion of the testing:

<u>Pollutant</u>	<u>Interval</u>
VE	On request

Test and test reports shall comply with the requirements of Florida Administrative Code Rule 17-2.700(6) and (7), respectively.

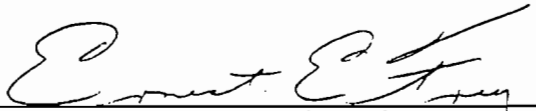
PERMITTEE:  
Guilford Gravure

Permit No.: A010-114659  
Date of Issue: January 29, 1986  
Expiration Date: January 29, 1991

13. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
14. Forms for renewal will be sent 5 months prior to January 29, 1991 and the completed forms with test results are due 90 days prior to January 29, 1991.

Issued this 29 day of January, 1986

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
Ernest E. Frey, District Manager

Check Sheet

Company Name: Guilford GRAVURE  
Permit Number: AC 10-13549  
PSD Number: \_\_\_\_\_  
Permit Engineer: \_\_\_\_\_

**Application:**

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

**Cross References:**

- AO 10 - 114659
- AC 10-105002
- 

*withdrawn*

**Intent:**

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT 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 Determination
- Other

**Post Permit Correspondence:**

- Extensions/Amendments/Modifications
- Other



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

Date: 03-Jan-1994 10:19am ES  
From: Bruce Mitchell TAL  
MITCHELL\_B  
Dept: Air Resources Manageme  
Tel No: 904/488-1344  
SUNCOM:

TO: Rita Felton JAX

( FELTON\_RA1@JAX1 )

Subject: RE: guilford gravure

January 3, 1994

Rita'

Good morning and Happy New Year, belatedly. I reviewed the IM with Preston Lewis this morning and came to the following conclusions (responses will be as numbered in your IM):

- 1) #1 of the Im is correct. The facility must have federally enforceable conditions in the permit/permits and have the total VOCs at less than 100 TPY; and, HAPs at less than 10 TPY of any one individual HAP or 25 TPY in the aggregate.
- 2) Modified is the appropriate word, since the facility wants federally enforceable limitations in their permit/permits and the changes sought appear to be changes in the method of operation and permitted conditions (i.e., reduction in hours of operation and/or pollutant limitations, etc.).
- 3) Since the facility will become minor by definition after the permitting exercise is completed, then the District should issue/reissue the permit/permits through a public notice exercise.
- 4) Any change in potential emissions from less than zero up to 5 TPY potential emissions would be \$250.00.

I hope this direction will be useful. If there are any questions, please give me or Preston a call.

Sincerely,

Bruce Mitchell  
direct: 904-921-9506  
SC/278-1344

cc: Clair Fancy  
John Brown  
Preston Lewis

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

**Date:** 03-Jan-1994 09:48am EST  
**From:** Rita Felton JAX  
FELTON\_R@A1@JAX1  
**Dept:** Northeast District Office  
**Tel No:** 904/488-4310 Ext. 370  
**SUNCOM:**

**TO:** Bruce Mitchell    TAL

( MITCHELL\_B @ A1 @ DER )

**Subject:** guilford gravure

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

**Date:** 13-Dec-1993 11:25am EST  
**From:** Preston Lewis TAL  
LEWIS\_P  
**Dept:** Air Resources Management  
**Tel No:** 904/488-1344  
**SUNCOM:**

**TO:** Bruce Mitchell TAL

( MITCHELL\_B )

**Subject:** NED E-Mail

Bruce, this seems to be mostly concerning Title V.  
Can you handle?

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

**Date:** 13-Dec-1993 09:13am EST  
**From:** Rita Felton JAX  
FELTON\_R@A1@JAX1  
**Dept:** Northeast District Office  
**Tel No:** 904/488-4310 Ext. 370  
**SUNCOM:**

**TO:** Teresa Heron TAL  
**TO:** Preston Lewis TAL

( HERON\_T @ A1 @ DER )  
( LEWIS\_P @ A1 @ DER )

**CC:** Bob Leetch JAX

( LEETCH\_B@A1@JAX1 )

**Subject:** Guilford Gravure, Clay County

Teresa ----

Mr. Bob Coleman, the P.E. for Guilford Gravure, called me last week concerning the permitting of the color presses at this facility. If you remember, Tallahassee issued the original construction permit for three color presses at the facility. The district has issued an operation permit for these three presses which is to expire January 1996. The facility applied for a construction permit to install a fourth color press, which I issued August 18, 1993 to expire on March 31, 1994. The facility is now prepared to submit the completion of construction for the fourth color press and obtain an operation permit, but has made the following requests:

1. The facility wishes to only have one permit to include all of the presses (four in total).
2. The P.E. is considering reducing facility emissions to less than 100TPY to avoid Title V.
3. The facility wishes to shift the concept from individual press types ( i.e. #2 color press, Tea Press, #4 Color press, etc.) to generic press units. Apparently, the facility can interchange parts of the presses to create presses to handle additional colors (i.e. what once was a press that handled only two colors can be made into a four color press by adding parts from another press).

Basically, the P.E. wants to modify the existing operation permit to include the recently installed #4 Color press and the above.

Our concerns are the following:

1. Because the facility is a Title V Facility, due to the existing operation permit (Total VOC annual emissions are 166 TPY), the facility must show that it is now longer a Title V Facility. This should be done by submitting the total emissions for the facility

*12-15-93 @ 3:24  
John @ PL on this - to  
draft a response - then  
PL/SBS - then E-mail  
+ hand copy*

by individual VOCs. ( Currently the existing operation permit emissions a limited by simply VOCs. The construction permit for the #4 Color press limits the emissions by individual VOCs.) In addition, by having the facility submit the facility emissions by individual VOCs, it can be determined if there are any HAPs being used by the facility.)

OK

2. Because there is the possibility that the VOCs will be reduced to less than 100 TPY, the district believes that the construction permit should be modified/revised to reflect this reduction (i.e. to be federally enforceable).

yes

3. If there is a reduction of VOC emission ( less than 100TPY) and since Tallahassee issued the original construction permit, should Tallahassee issue the modification of the existion construction permit?

NO

4. Should there be a reduction in facility VOC emissions, what would be the appropriate processing fee? This is more than a minor modification. It appears that this will take some time to process.

\$ 250

Please provide an answer to the above and any suggestions on how to handle this situation. The district has not received the completion of construction nor a processing fee to date. Mr. Coleman does however needs to know how to submit the above requests in the best manner and the appropriate processing fee.

Please either E-mail me with your response or call me at SUNCOM 880-4310, extension 370 as soon as possible. With the holidays quickly approaching, the beginning of January would be appreciated.

Thank you for your time.

Rita ----

Send to	Mundy, S. Drew
Street & No.	Sturford Graven
P.O. State & Zip Code	Sturford, CT
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	7-3-91

AC 10-105002  
AO 10-114659

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

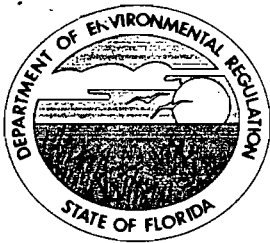
P 832 539 A02

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)  
2.  Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Mundy S. Drew, V.P. Sturford Graven, Inc 750 E. Main St. Sturford, CT 06405	4. Article Number P 832 539 802
5. Signature - Addressee X	Type of Service: <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 X Valerie Barlow	Always obtain signature of addressee or agent and <b>DATE DELIVERED.</b>
7. Date of Delivery 7/8/91	8. Addressee's Address (ONLY if requested and fee paid) Division of Air Resources Management

**RECEIVED**  
JUL 11 1991



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 3, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Mindy Gunther Drew  
Vice President  
Guilford Gravure, Inc.  
750 East Main Street  
Branford, CT 06405

Re: Guilford Gravure, Inc.  
Clay County, Florida  
AC 10-105002 & AO 10-114659

Dear Ms. Drew:

The Bureau has reviewed your letter dated February 11, 1991, requesting an exemption from the visible emissions testing requirements for the three dryers located at the above referenced facility. Based on the recommendation from our compliance staff (a copy of the memo is attached), your request for this exemption is being denied.

The frequency of visible emission testing should be that stated in Specific Condition No. 12 of operation permit No. AO 10-114659. Specific Condition No. 12 requires visible emission testing to be performed "on request." Therefore, the Department will continue to require visible emission testing prior to each renewal of the operation permit and whenever there is reason to believe the affected source may not be in compliance.

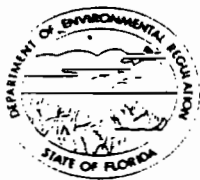
Sincerely,

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

CHF/MB/plm

Attachment

c: Johnny Cole, NED  
Jim Pennington, BAR



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: <u>Mirza B.</u>	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Barry Andrews  
Mirza Baig

THRU: Jim Pennington *JHP*

FROM: Mike Harley *MHarley*

DATE: June 4, 1991

SUBJ: Guilford Gravure--Three Packaging Rotogravure Presses  
Associated Dryers (AC 10-105002 & AO 10-114659)

On February 11, 1991, George Schmitt & Co. asked the Department to amend the above referenced permits by removing the visible emission limit of 20 percent opacity and eliminating the requirement for an EPA Method 9 emission test. Both the construction permit and the company's request have been reviewed.

It is recommended that the request be denied. The reasons for the denial are stated below.

The EPA Method 9 visible emission test is one of the simplest and least expensive emission tests. It provides a valuable tool for determining whether combustion sources are being properly operated and maintained. Even combustion sources that burn natural gas as a fuel can produce emissions in excess of 20% opacity if they are not properly maintained. As a minimum, it is recommended that the permittee be required to perform a visible emission compliance test annually and prior to each renewal of the operation permit.

The Department's Technical Evaluation and Preliminary Determination (August 15, 1985) gave the heat input capacity of the existing and proposed propane fired dryers as 3.2 MMBtu/hr. and 2.5 MMBtu/hr., respectively. The affected facility is subject to the General Visible Emissions Limiting Standard (20% opacity) in Rule 17-2.610(2). And, specific condition No. 7 of the construction permit requires the permittee to minimize the combustion product emissions through the use of measures including, but not limited to containing and/or venting emissions with hoods, fans, filters and similar equipment; ensuring optimum combustion by maintaining proper burner adjustment; and periodic maintenance of the dryer systems.



TO: Barry Andrews  
Mirza Baig  
DATE: June 4, 1991  
PAGE: Two

The most effective means of ensuring compliance with the visible emission limit and the maintenance requirement is through a periodic compliance test using EPA Method 9. The requirement for a visible emission test is supported by regulations which are part of the SIP. Rules 17-2.700(2)(a)1. and 3., F.A.C., specifically require the owner or operator of any source that is subject to an emission limiting standard to conduct an emission test prior to obtaining any operation permit. In addition Rule 17-2.700(2)(a)4., F.A.C., requires the owner of each source to conduct a formal compliance test for visible emissions during each federal fiscal year unless otherwise required by rule, order, or permit.

MDH/mdh

GEORGE SCHMITT & CO., INC.

Founded - 1874

February 11, 1991

RECEIVED

FEB 22 1991

DER-BAQM

Mr. Clare Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399

Dear Mr. Fancy:

Guilford Gravure (a subsidiary of George Schmitt & Co.) operates a small packaging rotogravure printing plant in Green Cove Springs, Florida. Guilford Gravure applied for and received permit #A010-114659 in 1986 to construct the facility. The operating permit is under review now.

The current permit requires a visual emission test at the facility. As we have discussed with Johnny Cole of the Jacksonville office, the only emission sources at the plant are the dryers on the three presses. These dryers are very small (<500,000 BTU each) combustion sources. Natural gas is the only fuel used at the plant. Given the nature of the process and the emissions from the plant there is no chance that the plant could even approach the allowed level of visible emissions (20%). As we explained to Mr. Cole we do not feel that the expense of a formal VE test is justified and request that it not be required as a condition of renewing the operating permit. As we told Mr. Cole, if there are any questions on this point, do not hesitate to call us.

I hope that this change can be easily made and if we can provide any additional information, please do not hesitate to contact us.

Sincerely,



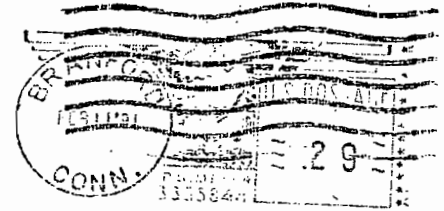
Mindy Gunther Drew  
Vice President  
Chief Financial Officer

MGD:sdo

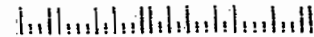
**GEORGE SCHMITT & CO., INC.**

750 East Main St., P.O. Box 812

Branford, CT 06405



Mr. Clare Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399



# george schmitt & co., inc.

750 east main st., p.o. box 812, branford, ct. 06405

203 481-2371

## RECEIVED

October 24, 1990

OCT 31 1990

Mr. Clare Fancy, P.E.  
Chief  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

DER-BAQM

Dear Mr. Fancy:

I have received your letter concerning construction permit No. AC 10-135549 concerning a potential modification to our plant in Green Cove Springs. Due to business considerations the project which required the construction permit has been cancelled. Therefore, we wish to withdraw our request for permit #AC 10-135549.

I would like to thank the Department for their patience in this matter.

Sincerely,



William G. Gunther  
President

WGG:sdo

cc: M. Harley  
A. Kutyna

P 256 395 195

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to	William J. Dunbar
Street and No.	George Schmitt & Co
P.O. State and ZIP Code	P.O. Box 812 Branford, CT
Postage	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	10-10-90 AC 10-135349

\* U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

- 1.  Show to whom delivered, date, and addressee's address. (Extra charge)
- 2.  Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. William J. Dunbar George Schmitt & Co., Inc. P.O. Box 812 Branford, CT 06405	4. Article Number P256 395 195
Type of Service: <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	
Always obtain signature of addressee or agent and DATE DELIVERED.	
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>Walt J. [unclear]</i>	
7. Date of Delivery <i>10-7-90</i>	

PS Form 3811, Apr. 1989

U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

October 17, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William G. Gunther  
President  
George Schmitt & Company, Inc.  
P. O. Box 812  
Branford, Connecticut 06405

RE: Construction Permit No. AC 10-135549 Guilford Gravure

Dear Mr. Gunther:

On June 11, 1987 the Department received the above referenced application for an air construction permit. A letter requesting the information that would be needed in order to proceed with our review of your proposed project was sent to you on July 9, 1987. We have not yet received a response to that letter. The Secretary recently implemented a policy that is intended to expedite the processing of active projects and remove obsolete projects from our files. This policy is intended to encourage permit applicants to respond to letters requesting additional information within about 90 days. Since your application has remained incomplete and inactive for the last 3 years, it will be necessary for you to either respond to the July 9, 1987 incompleteness letter or withdraw the application.

Please inform us in writing of your decision concerning the above referenced permit application within 30 days of receipt of this letter. In the absence of a response, it will be necessary for us to proceed with a denial of the application. If you have any questions please write to me at the address above or call Barry Andrews at (904) 488-1344.

Sincerely,

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

Attachment

cc: A. Kutyna, R. Coleman, J. Reid, P.E.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
2600 BLAIR STONE ROAD  
TWIN TOWERS OFFICE BUILDING  
TALLAHASSEE, FLORIDA 32301

*C. Fancay*

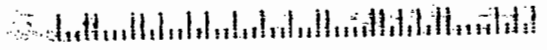
Mr. James R. Reid  
6746 Winterset Gardens Rd.  
Winter Haven, FL 33884



REID746 338844052 1990 10/25/90

REID  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD  
RETURN TO SENDER

Protecting Florida and Your Quality of Life



PM  
NO VA MSC  
8.10.87

fill copy

ROBERT D. COLEMAN  
806 N. Ivy St.  
Arlington Va. 22201

Mr. Mike Harley  
State of Florida  
Department of Environmental Regulation  
Twin Towers Office Bldg.  
2600 Blair Stone Rd.  
Tallahassee Florida 32399

August **DER** 1987

AUG 12 1987

**BAQM**

Dear Mr. Harley,

As you and I discussed on the 21th of July, Guilford Gravure is going to require some time to respond to your letter of July 9th. The time is required both to develop the information needed to respond to your questions and to the review the market conditions and our ability to compete for business in this new area.

I hope the delay causes you no inconvenience and we will respond as soon as possible.

Sincerely,

*Bob*

Robert D. Coleman

cc William Gunther, Guilford Gravure

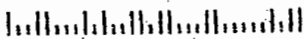
Copied: CHF/BT  
Mike Harley } 8/12/87 *mp*



R. Coleman  
806 N. Ivy St.  
Arlington Va. 22201

Mr. Mike Harley  
State of Florida  
Department of Environmental Reg.  
Twin Towers Office Bldg.  
2600 Blair Stone Rd.  
Tallahassee Florida 32399

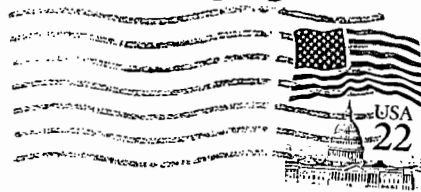
00111139



NOVA MSC 2201  
PM  
18 AUG  
1987

NOVA MSC 2201  
PM  
18 AUG  
1987

MORE



MORE

ALJINDFOR AS' 2201  
806 N. IVEY ST.  
ROBERT D. COLEMAN

P 408 531 203

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, Feb. 1982

Sent to	
Mr. William G. Gunther	
George Schmitt & Co.	
P.O. Box 812	
P.O., State and ZIP Code	
Branford, Connecticut	
Postage	\$06405
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
<b>TOTAL Postage and Fees</b>	\$
Postmark or Date	
Mailed: July 9, 1987	
AC 10-135549	

PS Form 3811, July 1983 447-845

**SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:  
Mr. William G. Gunther, Pres.  
George Schmitt & Co., Inc.  
Post Office Box 812  
Branford, Connecticut 06405

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured	P 408 531 203
<input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD	
<input type="checkbox"/> Express Mail	

Always obtain signature of addressee or agent and **DATE DELIVERED.**

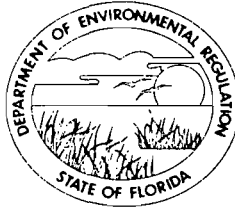
- Signature Addressee  
X *W G Gunther*
- Signature Agent  
X
- Date of Delivery  
7/10/87
- Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

Jii

STATE OF FLORIDA  
**DEPARTMENT OF ENVIRONMENTAL REGULATION**

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

July 9, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William G. Gunther  
President  
George Schmitt & Company, Inc.  
P.O. Box 812  
Branford, Connecticut 06405

Dear Mr. Gunther:

Re: Construction Permit No. AC 10-135549  
Guilford Gravure

Your application for a modification to Operation Permit Number A0 10-114659 proposes to increase the emissions allowed by a federally enforceable condition in a previously issued construction permit for your facility. Your application was received on June 10, 1987, and will be processed as a construction permit for a modification. We have reviewed the application package, which is referenced above, and find it to be incomplete. You will need to provide the following information in order for the Department to process the application:

1. Please provide a complete description of the new product that you propose to produce. All particulars are to be included. This information will be used to assess whether the proposed modification is subject to an applicable federal NSPS.
2. Identify and quantify (maximum pounds per hour and tons per year) each volatile organic compound (VOC) that is to be emitted as a result of the proposed project. Please provide all particulars.
3. Fully describe how VOC emissions are presently released to the ambient air from the facility. Identify and quantify the maximum concentrations (parts per million by volume) of each VOC that is to be emitted as a result of the proposed project. Also, identify the threshold limit values and the odor thresholds associated with each VOC.
4. Please discuss all retrofit technology that is available to control VOC emissions from the seven-color press and explain the advantages and disadvantages of each technology. Provide

Mr. William G. Gunther  
Page Two  
July 9, 1987

all particulars, including a comparison of the costs of each retrofit technology to that of a new seven-color press with emission controls and the emission reductions achievable with each technology.


5. Separately quantify in maximum pounds per hour the quantity of inks, adhesives, and solvents that are to be used for the proposed projects. Include the percentage of VOCs contained in each.
6. Describe how the proposed inks, adhesives, and solvents are to be stored. Please provide all particulars, including the capacity of any storage vessels.
7. Describe the work practices that will be used to minimize the emissions of VOCs from the storage, handling, and application of the inks, adhesives, and solvents that are to be used for the proposed project.
8. Identify and discuss the factors that limit the projected VOC emission increase resulting from the proposed project to 29 tons per year and the total VOC emissions from the proposed project to 500 pounds per hour and 95 tons per year.
9. Since the EPA does not recognize annual emission limitations as sufficiently enforceable for modifications, such as the one you propose--explain and quantify the federally enforceable restrictions that might be applied to limit the VOC emissions from the proposed project to 95 tons per year. How would compliance be demonstrated?
10. Identify and quantify any increased emissions of pollutants listed in Table 500-2 of Chapter 17-2, Florida Administrative Code, that are expected to result from the proposed project.
11. Please explain and justify why low solvent technology cannot be used for the new product line.

Please state and justify all assumptions; and, show all calculations.

Mr. William G. Gunther  
Page Three  
July 9, 1987

We will resume processing of the application package upon receipt of the requested information. If you have any questions or wish to meet with us, please call Mike Harley at (904)488-1344 or write to me at the above address.

Sincerely,



C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/plm

cc: W. P. Stewart  
B. Coleman  
J. R. Reid, P.E.

We will resume processing of the application upon receipt of the requested information. If you have any questions or wish to meet with us, please call Mike Harley at (904)488-1344 or write to me at the above address.

Keeping this for  
addresses on  
quilted journal  
AC 10-135549

Sincerely,

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/plm

cc: W. P. Stewart  
B. Coleman  
J. R. Reid

*Do Not Type*

*Address*

*Notes:*

*W.P. Stewart is DER NE District Office*

*Bob Coleman is 806 North ~~King~~<sup>Ivy</sup> Street, Arlington, Va 22201*

*James R. Reid is 6746 Winterset Gardens Road, Winter Haven,  
Fl. 33884*

# george schmitt & co., inc.

750 east main st., p.o. box 812, branford, ct. 06405

203 481-2371

May 28, 1987

DER

JUN 11 1987

BAQM

Mr. William Thomas  
State of Florida  
Department of Environmental Regulation  
2600 Blairstone Road  
Tallahassee, Florida 32301

Re: Request for Modification of Operating Permit A010-114659

Dear Mr. Thomas:

1864

It is my understanding that Mr. Johnny Cole of your Jacksonville office has recently discussed with Bob Coleman the company's need to modify the operating permit to allow for increased VOC emissions from one of the presses at Guilford Gravure's plant in Green Cove Springs, Florida. (Permit #A010-114659). That press is a seven color packaging rotogravure printing press.

As Bob discussed with Mr. Cole, the request for modification is based on the necessary expansion by Guilford Gravure into several related product lines. As these new lines will require an increased volume of ink over current products, we are requesting an increase in allowed VOC emissions to the level specified in the enclosed request for modification of the operating permit. Emissions from other presses and for other pollutants are not expected to change. Nor do we anticipate any physical modifications to the press.

If you have any questions concerning this application, please do not hesitate to contact either Bob Coleman (703/243-7018) or myself.

Sincerely,



William G. Gunther  
President

WGG:agh

Enclosure

copied

Johnny Cole 6-11-87 *WGG*

RECEIVED  
DER-MAIL ROOM  
1987 JUN 10 AM 10:41

GUILFORD GRAVURE REQUEST FOR MODIFICATION

PRELIMINARY STATEMENT

The following application seeks a modification of operating permit # A010-114659 to allow for increased VOC emissions from a seven color press at Guilford Gravure's plant in Green Cove Spring, Florida. This limited increase in emissions is required for Guilford Gravure to produce a line of new labels. As documented in materials previously filed in connection with the existing permit, the design of the seven color press will not accommodate add-on controls and standard emission controls do not exist for this press. Additionally, at the present time low solvent ink cannot be used on this press for the new product line.

After the modified permit is granted the maximum VOC emissions will be 95 tons/year. Total plant emissions after the modification will be less than 200 tons/year. Emissions of pollutants other than VOC are not changed by this request for permit modification. The attached application for permit modification addresses only the changes requested for the seven color press. No changes are requested in the permit for other presses.



GUILFORD GRAVURE REQUEST FOR MODIFICATION

PRELIMINARY STATEMENT

The following application seeks a modification of operating permit # A010-114659 to allow for increased VOC emissions from a seven color press at Guilford Gravure's plant in Green Cove Spring, Florida. This limited increase in emissions is required for Guilford Gravure to produce a line of new labels. As documented in materials previously filed in connection with the existing permit, the design of the seven color press will not accommodate add-on controls and standard emission controls do not exist for this press. Additionally, at the present time low solvent ink cannot be used on this press for the new product line.

After the modified permit is granted the maximum VOC emissions will be 95 tons/year. Total plant emissions after the modification will be less than 200 tons/year. Emissions of pollutants other than VOC are not changed by this request for permit modification. The attached application for permit modification addresses only the changes requested for the seven color press. No changes are requested in the permit for other presses.

major  
facility

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD  
JACKSONVILLE, FLORIDA 32207  
(904) 396-6959



DER

JUN 11 1987

BAQM

BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY  
ERNEST E. FREY  
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Rotogravure Packaging Printing [ ] New<sup>1</sup> [x] Existing<sup>1</sup>

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

COMPANY NAME: Guilford Gravure COUNTY: Clay

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) Seven Color Press

SOURCE LOCATION: Street 1272 Harbor Road City Green Cove Springs

UTM: East \_\_\_\_\_ North \_\_\_\_\_

Latitude 30 ° 00 ' 32 "N Longitude 81 ° 41 ' 42 "W

APPLICANT NAME AND TITLE: William G. Gunther, President and Chief Operating Officer

APPLICANT ADDRESS: 750 East Main Street, Branford, CT 06405

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Guilford Gravure

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: William G. Gunther

William G. Gunther, President  
Name and Title (Please Type)  
and Chief Operating Officer

Date: 5/29/87 Telephone No. (203)481-2371

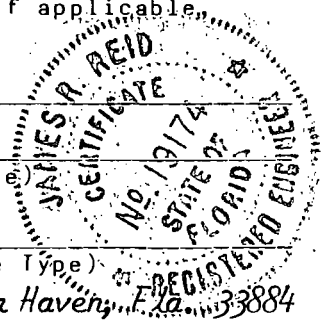
B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been ~~examined~~/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

<sup>1</sup> 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 James R. Reid  
James R. Reid  
 Name (Please Type)  
(Independent)  
 Company Name (Please Type)  
6746 Winterset Gardens Road, Winter Haven, Fla. 33884  
 Mailing Address (Please Type)



Florida Registration No. P.E. 0019174 Date: 6/5/87 Telephone No. (813) 324-0316

**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.

See Attached Preliminary Statement

B. Schedule of project covered in this application (Construction Permit Application Only)  
 Start of Construction N/A Completion of Construction \_\_\_\_\_

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.)  
N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.  
Operating Permit #A010-114659

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

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? no
    - a. If yes, has "offset" been applied? \_\_\_\_\_
    - b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_
    - c. If yes, list non-attainment pollutants. \_\_\_\_\_
  2. Does best available control technology (BACT) apply to this source?  
If yes, see Section VI. no
  3. Does the State "Prevention of Significant Deterioration" (PSD)  
requirement apply to this source? If yes, see Sections VI and VII. no
  4. Do "Standards of Performance for New Stationary Sources" (NSPS)  
apply to this source? no
  5. Do "National Emission Standards for Hazardous Air Pollutants"  
(NESHAP) apply to this source? no
- H. Do "Reasonably Available Control Technology" (RACT) requirements apply  
to this source? no
- 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 justifi-  
cation for any answer of "No" that might be considered questionable.

**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 (MAX)	* Relate to Flow Diagram
	Type	% Wt (MAX.)		
7 Color Press Ink	VOC	85	450	
7 Color Press Solvent	VOC	100	120	

\* See Previous Permit

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

- Total Process Input Rate (lbs/hr): N/A
- Product Weight (lbs/hr): \_\_\_\_\_

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

Name of Contaminant	Emission <sup>1</sup>		Allowed <sup>2</sup> Emission Rate per Rule 17-2	Allowable <sup>3</sup> Emission lbs/hr	Potential <sup>4</sup> Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
VOC -							
7 Color Press	500	95	N/A	500	500	95	Fugitive

<sup>1</sup>See Section V, Item 2.

<sup>2</sup>Reference 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)

<sup>3</sup>Calculated from operating rate and applicable standard.

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

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

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

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: N/A Percent Ash: \_\_\_\_\_

Density: N/A 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.

Annual Average N/A Maximum \_\_\_\_\_

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

Used solvents and ink solids. Removal by licensed transporter.

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

Stack Height: N/A (Emissions are fugitive) ft. Stack Diameter: \_\_\_\_\_ ft.  
 Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM Gas Exit Temperature: \_\_\_\_\_ °F.  
 Water Vapor Content: \_\_\_\_\_ % Velocity: \_\_\_\_\_ FPS

**SECTION IV: INCINERATOR INFORMATION**

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	N/A						
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) <sup>3</sup>	Heat Release (BTU/hr)	Fuel		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: N/A

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

N/A

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

**SECTION V: SUPPLEMENTAL REQUIREMENTS**

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**

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
N/A	

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

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

\*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height:

ft.

b. Diameter:

ft.

c. Flow Rate:

ACFM

d. Temperature:

°F.

e. Velocity:

FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

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:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

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:<sup>1</sup>

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

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:<sup>1</sup>

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

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:<sup>1</sup>

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:<sup>2</sup>

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.



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 <sup>2</sup>	_____ 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.

1864

51-10/111

15103

750 EAST MAIN ST.  
P.O. BOX 812  
BRANFORD, CONN. 06405

REMITTANCE ADVICE					

**THE SUM 500 DOLS 00 CTS**

PAY

DOLLARS

TO THE ORDER OF	DATE	GROSS	DISC.	CODE NUMBER	CHECK NO.	CHECK AMOUNT
FLA Dept of Environmental Regulation	5-29-87	500.00		11	15103	500.00

UNION TRUST COMPANY  
NEW HAVEN, CONNECTICUT

*Windy Gunther*

TREASURER

Re: Request for Modification of Operating Permit A010-114659

Dear Mr. Thomas:

1864

It is my understanding that Mr. Johnny Cole of your Jacksonville office has recently discussed with Bob Coleman the company's need to modify the operating permit to allow for increased VOC emissions from one of the presses at Guilford Gravure's plant in Green Cove Springs, Florida. (Permit #A010-114659). That press is a seven color packaging rotogravure printing press.

As Bob discussed with Mr. Cole, the request for modification is based on the necessary expansion by Guilford Gravure into several related product lines. As these new lines will require an increased volume of ink over current products, we are requesting an increase in allowed VOC emissions to the level specified in the enclosed request for modification of the operating permit. Emissions from other presses and for other pollutants are not expected to change. Nor do we anticipate any physical modifications to the press.

If you have any questions concerning this application, please do not hesitate to contact either Bob Coleman (703/243-7018) or myself.

Sincerely,

*William G. Gunther*

William G. Gunther  
President

WGG:agh

Enclosure

RECEIVED  
DER-MAIL ROOM  
1987 JUN 10 AM 10:41

Department of Environmental Regulation

Daily Cash Listing # 17

Date Received 06-10-87

Dep # 1864

Bureau of Accounting & Budgeting (Revenue Section)

Date Bureau of Air Quality Received 6-11-87

Lister's Signature Lil Sweeney

Signature of Receiver *R. L. ...*

REMITTED BY	CHECK NUMBER	AMOUNT	RECEIPT NUMBER	REVENUE CODE	FILE NUMBER
George Schmitt Co. Inc.	# 15103	\$ 500.00	76167	001031	AC 10-135549
		\$ 500.00			

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

Nº 76167

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from George Schmitt Co., Inc. Date June 11, 1967  
Address 750 East Main St., Branford, Conn. 06405 Dollars \$ 500.00  
Applicant Name & Address Guilford Granite, 1272 Harbor Rd., Green Cove Springs, FL  
Source of Revenue ✓ # 15103  
Revenue Code 001031 Application Number AC 10-135549  
By R. Bruce [Signature]



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee			
To: _____	Locn: _____		
To: _____	Locn: _____		
To: _____	Locn: _____		
From: _____	Date: _____		
Reply Optional	Reply Required		
Date Due: _____	Date Due: _____		

TO: Revenue Section  
Bureau of Accounting and Budgeting

FROM: Cost Center \_\_\_\_\_ Air Quality

SUBJECT: Cash Listing Number # 17 Dated 06-10-87

The cash listing received from your office has been checked and confirmed to be correct in all areas.

6/11/87  
Date

*R. Bruce Hatcher*  
Signature of verifying party

The cash listing received from your office has been checked and found to contain one or more discrepancies. A corrected cash listing is attached. Please adjust your records accordingly.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of verifying party

Number of remittances in this cash listing 1.