

P 408 533 629

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. William G. Gunther	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	30c
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 10/16/85	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983

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.
2. Restricted Delivery.

3. Article Addressed to:
Mr. William G. Gunther
Guilford Gravure, Inc.
P. O. Box 448
Guilford, Connecticut 06437

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 408 533 629

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

5. Signature — Addressee
X

6. Signature — Agent
X *Rubens F. Weyne*

7. Date of Delivery
10-16-85

8. Addressee's Address (ONLY if requested and fee paid)
Guilford, CT

DOMESTIC RETURN RECEIPT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

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

October 16, 1985

Enclosed is Permit Number AC 10-105002 to Guilford Gravure which authorizes the construction of rotogravure packaging printing presses at Guilford Gravure's existing facility in Clay County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 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 this permit is filed with the clerk of the Department.

Sincerely,

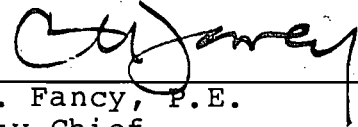
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Enclosure

cc: Johnny Cole
Robert Coleman

CERTIFICATION

This is to certify that the foregoing Notice of Permit and all copies requested were mailed before the close of business on 16 October, 1985.



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Patricia G. Adams October 16, 1985
Clerk Date

Technical Evaluation
and
Preliminary Determination

Guilford Gravure
Green Cove Springs
Clay County, Florida

Rotogravure Packaging Printing Presses

Permit No: AC 10-105002

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting Section

October 10, 1985

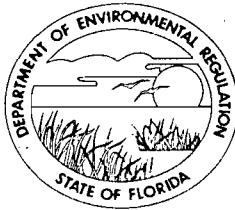
Final Determination
Rotogravure Packaging Printing Presses
AC 10-105002

Guilford Gravure's application for a permit to construct rotogravure packaging printing presses at their existing facility in Green Cove Springs, Clay County, Florida, has been reviewed by the Bureau of Air Quality Management. Public Notice of the department's Intent to Issue the permit was published in the Clay Today on September 3, 1985.

No comments were received on the Public Notice. The final action of the department will be to issue the permit as proposed in the preliminary determination.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Guilford Gravure
1272 Harbour Road
Green Cove Springs, Florida
32043

Permit Number: AC 10-105002
Expiration Date: April 15, 1986
County: Clay
Latitude/Longitude: 30° 00' 32"N/
81° 41' 42"W
Project: Rotogravure Label
Printing

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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 drawings, plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the construction of a rotogravure packaging printing facility consisting of a 2 color 14 inch press, a 7 color 36 inch press, a 2 color 16 inch press, and their associated propane fired dryers.

Construction shall be in accordance with the attached permit application unless otherwise stated in the general and specific conditions herein.

Attachments are as follows:

1. Guilford Gravure's letter dated December 8, 1984.
2. DER's letter dated December 28, 1984.
3. Applications to construct air pollution sources from Guilford Gravure dated May 25, 1985.
4. Robert Coleman's letter dated July 22, 1985.
5. DER's letter of completeness dated August 1, 1985.

PERMITTEE: Guilford Gravure

Permit Number: AC 10-105002
Expiration Date: April 15, 1986

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.

PERMITTEE: Guilford Gravure

Permit Number: AC 10-105002

Expiration Date: April 15, 1986

GENERAL CONDITIONS:

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:

- 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 non-compliance; 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.

PERMITTEE: Guilford Gravure

Permit Number: AC 10-105002
Expiration Date: April 15, 1986

GENERAL CONDITIONS:

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 non-compliance 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)
- () Compliance with New Source Performance Standards.

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.

PERMITTEE: Guilford Gravure

Permit Number: AC 10-105002
Expiration Date: April 15, 1986

GENERAL CONDITIONS:

- 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 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.

SPECIFIC CONDITIONS:

- 1. Continous operation of the facility will be permitted, provided emission limits are not exceeded.
- 2. VOC emissions shall not exceed the amounts indicated below:

Equipment	Emissions	
	lb/hr	TPY
Press 1 - 2 Color 14 inch	65	40
Press 2 - 7 Color 36 inch	152	66
Press 3 - 2 Color 16 inch	65	55
Total		161

PERMITTEE: Guilford Gravure

Permit Number: AC 10-105002
Expiration Date: April 15, 1986

SPECIFIC CONDITIONS:

3. Procedures to minimize VOC emissions shall include, but not limited to:
 - o maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.;
 - o 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;
 - o all fittings, valves, lines, etc., shall be properly maintained;
 - o all VOC spills shall be attended to immediately and the materials properly disposed of, recycled, etc.; and,
 - o maintain a monthly accounting of the VOC per type such that the beginning inventory and deliveries are accounted for.
4. There shall be no objectionable odor on off-plant property.
5. The permittee shall investigate and apply the use of low solvent technology for reducing VOC emissions as it becomes available.
6. The emissions from the dryers shall not exceed 1 TPY for any of the pollutants NO_x , PM or VOC.
7. 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.
8. Visible emissions shall not exceed 20% opacity, using EPA Method 9, Visual Determination of the Opacity for Emissions from Stationary Sources.
9. Compliance with the particulate emission standards will be determined using EPA Method 9.
10. Compliance tests shall be performed at 90-100% of the permitted equipment capacity.

PERMITTEE: Guilford Gravure

Permit Number: AC 10-105002

Expiration Date: April 15, 1986

SPECIFIC CONDITIONS:

11. A 15 day prior notification of the compliance testing date shall be given to DER's Northeast District office.

12. Compliance test results, in accordance with Rule 17-2.700, FAC, shall be submitted to DER's Northeast District office within 45 days of completion of tests.

13. Construction shall reasonably conform to the information submitted in this application.

14. The permittee will demonstrate compliance with the conditions of this construction permit and submit a complete application for an operating permit to the Department's Northeast District office 90 days prior to the expiration date of the construction permit.

15. Upon obtaining an operating permit the permittee will be required to submit annual reports, unless otherwise requested by DER, on the actual operation and emissions of the sources to the DER's Northeast District office.

16. Any change in the method of operation, equipment, or operating hours shall be submitted for approval to the Department's Northeast District office.

17. Any delay in the construction or completion of this project shall be reported to the DER's Northeast District office.

Issued this 14 day of 1985, 1985

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


VICTORIA J. TSCHINKEL, Secretary

___ pages attached.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

TO: Victoria J. Tschinkel
FROM: *George* Clair Fancy

DATE: October 11, 1985

SUBJ: Approval of Attached Air Construction Permit

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____	RECEIVED
To: _____	
To: _____	
FROM: _____	

LOCN: _____
DATE: 11 1985

Office of the Secretary

Attached for your approval and signature is one Air Construction Permit to Guilford Gravure to construct rotogravure packaging printing presses at the company's existing facility in Clay County, Florida.

Day 90, after which the permit would be issued by default, is December 5, 1985

The Bureau recommends your approval and signature.

CF/pa

Attachment

Check Sheet

Company Name: GUILFORD GRAVURE

Permit Number: AC 10-106002

PSD Number: _____

Permit Engineer: _____

Application:

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

Cross References:

-
-
-

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

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

March 27, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

02
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:

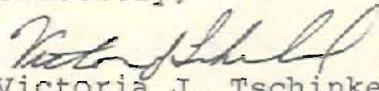
From: April 15, 1986
To: August 15, 1986

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

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

RECEIVED

For Routing To District Offices
And/Or To Other Than The Addressee

To: _____ Locn.: _____
To: _____ Locn.: **MAR 27 1986**
To: _____ Locn.: _____
From: _____ Date: _____

Reply Optional [] Reply Required [] Info. conty. []
Date Due: _____ Date Due: _____

TO: Victoria J. Tschinkel
FROM: Clair Fancy *CF*
DATE: March 27, 1986
SUBJ: Request to Extend Permit No. AC 10-105002
Guilford Gravure, Inc.

Attached for your signature is a letter extending the expiration date of Permit No. AC 10-105002 to Guilford Gravure, Inc. The Bureau of Air Quality Management recommends that the extension be approved.

CHF/pa

Attachment

P 408 533 187

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to	
Mr. William G. Gunther	
Street and No.	
P.O., State and ZIP Code	
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	
4/3/86	

PS Form 3800, Feb. 1982

DER
MAR 31 1986
BAQM

HALE AND DORR

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

COUNSELLORS AT LAW

1201 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20004

(202) 393-0800

CABLE HAFIS WSH
TELECOPIER (202) 393-4497

IN BOSTON
60 STATE STREET
BOSTON, MASSACHUSETTS 02109
(617) 742-9100

FEDERAL EXPRESS

February 13, 1986

Mr. William Thomas
State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
FEB 14 1986
BAQM

Re: Request for Extension
Construction Permit (#AC10-105002)

Dear Mr. Thomas:

On October 15, 1985, the Department of Environmental Regulation granted a construction permit (permit number AC10-105002) to Guilford Gravure of Green Cove Springs. This permit was to regularize the status of two existing presses and to allow the construction of a new press. The construction permit is scheduled to expire on April 15, 1985.

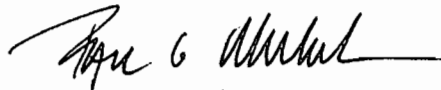
Guilford Gravure has applied to the Northeast District DER office for an operating permit for the two existing presses. However, the short duration of the current construction permit will not permit the completion of the construction of the new press, much less its installation and start-up prior to April 15, 1986.

The new press is under construction in Connecticut and should be ready to ship to Florida before May 15, 1986. Shipment, installation and startup will take several months. Therefore, based upon conversations with DER officials, on behalf of Guilford Gravure I am requesting an extension of our current construction permit -- solely as it applies to the new press -- from April 15, 1986 until August 15, 1986. It is my understanding that this extension will not affect the two existing presses at the plant or the processing of the operating permits for those two presses.

Mr. William Thomas
February 13, 1986
Page Two

If you have any questions or if you require any additional information please do not hesitate to call me. Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul G. Wallach".

Paul G. Wallach

PGW:bas
cc: Mr. William Gunther

DER

FEB 14 1986

BAQM

GUILFORD GRAVURE CORP.

1272 Harbor Road
P.O. Box 1125
Green Cove Springs, Florida 32043

DER

SEP 11 1985

~~BAQM~~

Phone (904) 264-6252

September 9, 1985

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

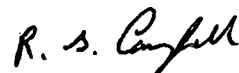
Attention: Mr. C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management

Reference: Your letter of August 15, 1985 to:
Mr. William G. Gunther
Vice President
Guilford Gravure, Inc.
Post Office Box 448
Guilford, CT 06437

Dear Mr. Fancy:

Pursuant to your request in the aforementioned letter to Mr. Gunther, I am forwarding proof of publication of the "Notice of Proposed Agency Action" pertaining to the issuing of a permit for Guilford Gravure in Green Cove Springs, Clay County, Florida.

Respectfully,



R. G. Campbell
Plant Manager

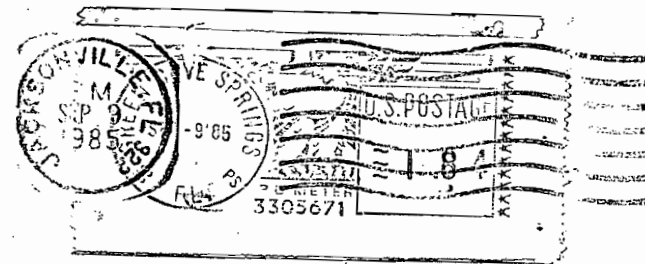
Enclosures

cc: Mr. R. Coleman
Mr. W. Gunther

RGC:tac

GUILFORD GRAVURE CORP.

1272 Harbor Road
P.O. Box 1125
Green Cove Springs, Florida 32043



Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241
ATTN: Mr. C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management



CLAY TODAY
Published Daily
(except Saturday and Sunday)
Orange Park
of Clay County, Florida

STATE OF FLORIDA } ss.
COUNTY OF CLAY

Before the undersigned authority personally appeared Tony Ferrera

who on oath says that he is Advertising Manager

of Clay Today, a daily newspaper published at Orange Park in Clay County, Florida;

that the attached copy of advertisement, being a Legal Notice

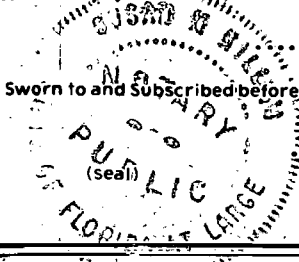
in the matter of State of Florida Dept. of Environmental
Regulation Notice of Proposed Agency Action
on Permit Application

in the Court,

was published in said newspaper in the issues of Tues., Sept. 3, 1985

Affiant further says that Clay Today is a newspaper published at Orange Park, in said Clay County, Florida, and that the said newspaper has heretofore been continuously published in said Clay County, Florida, each day, except Saturdays and Sundays, under the name of "Clay Today," and has been entered as second class mail matter at the post office in the Town of Orange Park, in said Clay County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this 3rd day of September, 1985 A.D.



Susan M. Kellam
Notary Public, Clay County Florida
NOTARY PUBLIC, STATE OF FLORIDA
My Commission Expires Mar. 22, 1988
My commission expires

COPY OF ADVERTISEMENT

State of Florida
Department of
Environmental
Regulation
Notice of Proposed
Agency Action
on Permit
Application

The Department of Environmental Regulation gives notice of its intent to issue a permit to Guilford Gravure to construct a rotogravure printing facility located at the applicant's existing facility in Green Cove Springs, Clay County, Florida. A determination of best available control technology (BACT) was not required. Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers; Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period constitutes a waiver of any right such person may have to request an administrative determination under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee

Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes. The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Dept. of Environmental Regulation, Northeast District, 3426 Bills Road, Jacksonville, Florida 32207.

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301
Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.
Legal No. 002968 published
Tues., Sept. 3, 1985 in
Clay County's daily Clay
Today newspaper.

P 085 152 634

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1984-446-014

PS Form 3800, Feb. 1982

Sent to Mr. William G. Gunther	
Street and No.	
P.O., State and ZIP Code	
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 8/16/85	

PS Form 3811, July 1983

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
Guilford Gravure, Inc.
P. O. Box 448
Guilford, Conn. 06437

4. Type of Service: Article Number
 Registered Insured
 Certified COD P 085 152 634
 Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
X *W. G. Gunther*

6. Signature - Agent
X

7. Date of Delivery
AUG 19 1985

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

DOMESTIC RETURN RECEIPT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

August 15, 1985

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Gunther:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit to construct a Rotogravure press facility at your existing site in Green Cove Springs, Clay County, Florida.

Before final action can be taken on your draft permit, you are required by Florida Administrative Code Rule 17-103.150 to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Clay County no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice may be grounds for denial of the permit.

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

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

CHF/pa

Attachments

cc: Johnny Cole
Robert Coleman

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action
on Permit Application

The Department of Environmental Regulation gives notice of its intent to issue a permit to Guilford Gravure to construct a rotogravure printing facility located at the applicant's existing facility in Green Cove Springs, Clay County, Florida. A determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period constitutes a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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

Dept. of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

publication of the public notice (copy attached) required pursuant to Rule 17-103.150, Florida Administrative Code, whichever occurs first. The petition must comply with the requirements of Section 17-103.155 and Rule 28-5.201, Florida Administrative Code (copy attached) and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32301.

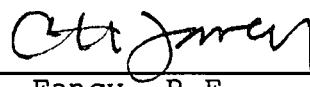
Petitions which are not filed in accordance with the above provisions are subject to dismissal by the Department. In the event a formal hearing is conducted pursuant to Section 120.57(1), all parties shall have an opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witnesses and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exceptions to any order or hearing officer's recommended order, and to be represented by counsel. If an informal hearing is requested, the agency, in accordance with its rules of procedure, will provide affected persons or parties or their counsel an opportunity, at a convenient time and place, to present to the agency or hearing officer, written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition, may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of

Administrative Hearings, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

Executed the 15 day of August, 1985, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

Johnny Cole
3426 Bills Road
Jacksonville, Florida 32207

Robert Coleman
806 N. Ivy S.
Arlington, Virginia 22201

CERTIFICATION

This is to certify that the foregoing Intent to Issue and all copies were mailed before the close of business on 10 Aug., 1985.



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby acknow-
ledged.

Patricia G. Adams August 16, 1985
Clerk Date

Technical Evaluation
and
Preliminary Determination

Guilford Gravure
Green Cove Springs
Clay County, Florida

Rotogravure Packaging Printing Presses

Permit No: AC 10-105002

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting Section

August 15, 1985

I. Application

A. Applicant

Guilford Gravure
1272 Harbour Road
Green Cove Springs, Florida 32043

B. Project and Location

The applicant proposes to expand their existing beverage label manufacturing operation. A new rotogravure press will be added to two existing ones. Total ink consumption for the facility will be about 110 tons per year (TPY). Solvent consumption will also amount to about 110 (TPY). Volatile organic compounds (VOCs) emissions will amount to about 165 TPY. Propane fired dryers will emit combustion products, where heat input rate will amount to a total of about 6 million Btu/hr.

The project will be located at the applicant's existing facility in Clay County. The UTM coordinates of this site are Zone 17, 3319.79 km N and 432.97 km E.

C. Sources Reviewed

The technical review will cover a 2 color 14 inch press, a 7 color 36 inch press, a proposed 2 color 16 inch press and their associated dryers. These three rotogravure presses will utilize inks and solvents which will be sources of fugitive VOC emissions. VOCs are precursors to ozone. This application was submitted on June 3, 1985, and deemed complete on July 29, 1985.

D. Facility Classification

The Standard Industrial Classification (SIC) Code, of this facility is Group No. 275 Commercial Printing, Industry No. 2754 Gravure Printing.

Guilford Gravure is a major emitting facility for VOCs, as the emissions exceed 100 TPY.

II. Process Description

A. Process

A continuous layer of substrate is printed upon by an etched coating roll. Recesses in the roll pick up and transfer ink onto the substrate. Solvents are added to the ink to maintain proper viscosity, and act as carriers for the solids in the inks, in the transfer process onto the substrate. The solvent is later evaporated in dryers leaving the ink solids behind on the labels. A sketch of the process is enclosed in attachment 3.

B. Operating Hours

The printing facility operates continuously i.e., for 8760 hrs/yr, but does have a lot of down time on equipment, which is required to make changes in product lines.

C. Background Information

The Guilford Gravure plant in Green Cove Springs is a small rotogravure printing plant serving the packaging needs of the beverage industry. The plant was constructed in 1979 and currently has two rotogravure presses. One press is a two color 14 inch press used mainly for producing tea labels and the other is a 36 inch seven color press used for a variety of labels including many for the liquor industry. The proposed rotogravure press will be a two color 16 inch press also to be used for manufacturing labels for the beverage industry.

Guilford Gravure is submitting these applications now because it was specifically exempted from permitting requirements by the Department in 1980. This 1980 exemption was based on the small size and location of the source.

During 1984 the plant produced in excess of 3.1 billion labels. As with plants in the rotogravure packaging industry the plant's operation is characterized by a large amount of down time (needed to change from one product line to another) and the use of a large number of different inks and solvents. To produce its product line the plant uses over 25 different inks, solvents, and varnishes.

III. Rule Applicability

The proposed project will emit the pollutants VOC, particulate matter (PM), nitrogen oxides (NO_x), carbon monoxide (CO), and sulfur dioxide (SO₂), and is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Chapters 17-2 and 17-4.

Guilford Gravure's facility is located in an area designated as attainment for all pollutants, Rule 17-2.420, FAC, in Clay County.

The printing facility is considered major since the VOC emissions exceed 100 TPY, as defined under Rule 17-2.100(98), FAC, but will not be subject to PSD review requirements because the emissions are below 250 TPY, Rule 17-2.500(2)(c), FAC.

The New Source Performance Standard (NSPS), 40 CFR 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, does not apply to this

facility since the labels manufactured are not pressure sensitive.

NSPS, 40 CFR 60 Subpart QQ- Standards of Performance for the Graphic Arts Industry : Publication Rotogravure Printing, does not apply since the facility does not print publications.

The General Particulate Emission Limiting Standards, Rule 17-2.610, FAC, and the General Pollutant Emission Limiting Standards under Rule 17-2.620, FAC, are applicable to this printing facility. These standards specify a visible emissions limit of 20% opacity; the use of emission control equipment, and measures, deemed necessary by the department; and prohibit the emission of objectionable odor.

IV. Source Impact Analysis

A. Emission Limitations

There is no add-on pollution control equipment available for the three rotogravure presses nor have they been designed for add-on equipment. The majority of emissions from the facility will result from the VOC's in the printing inks and solvents, as summarized below:

Press #	Material	% VOC	Utilization lb/hr	Emissions	
				lb/hr	TPY
1) 2 color 14 in.	ink solvent	62 100	40 40	65	40
2) 7 color 36 in.	ink solvent	60 100	80 112	152	66
3) 2 color 16 in.	ink solvent	62 100	40 40	65	55
Total:				282	161

Note: This table is based on continuous operating hours including line change downtime. Amounts of VOCs emitted are based on material inventory system, and with the assumption that 100% of the VOCs in those materials are emitted.

The department feels that the following preventive, in-house maintenance procedures, should be followed to achieve a cleaner operation and to minimize fugitive VOC emissions:

- o maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.;

- o 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;
- o all fittings, valves, lines, etc., shall be properly maintained;
- o all VOC spills shall be attended to immediately and the materials properly disposed of, recycled, etc.; and,
- o maintain a monthly accounting of the VOC per type such that the beginning inventory and deliveries are accounted for.

Emissions from the existing 3.2 MMBtu/hr, and the proposed 2.5 MMBtu/hr propane fired dryers have been estimated using Table 1.5-1, Emission Factors for Liquefied Petroleum Gas (LPG) Combustion in AP-42. The factors for commercial burners, in lbs/1000 gal are: 0.44 (PM), 8.8 (NO_x), 0.47 (VOC), 1.8 (CO) and 0.09 (given as sulfur content, for SO₂). The primary pollutants emitted, considering the combined capacity of both dryers, will amount to about 0.8 lb/hr of NO_x, 0.1 lb/hr of PM and 0.02 lb/hr of VOC. On an annual basis these combustion product emissions will amount to less than 1 TPY for each of the three primary pollutants.

Precautions to minimize PM will be necessary including, but not limited to: the use of hoods, fans, filters, and similar equipment to contain and/or vent PM; maintaining proper burner adjustments to ensure optimum combustion; and periodic maintenance for the dryer systems.

B. Air Quality Analysis

The technical evaluation of this application determined that ambient air monitoring or modeling would not be required to provide reasonable assurance that Florida's air quality standards would not be violated.

V. Conclusion

Based on the information submitted by the applicant, the technical review concluded that the sources will be in compliance with the state air quality regulations provided the general and specific conditions of the construction permit are fulfilled.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Guilford Gravure
1272 Harbour Road
Green Cove Springs, Florida
32043

Permit Number: AC 10-105002
Expiration Date: April 15, 1986
County: Clay
Latitude/Longitude: 30° 00' 32"N/
81° 41' 42"W
Project: Rotogravure Label
Printing

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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 drawings, plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the construction of a rotogravure packaging printing facility consisting of a 2 color 14 inch press, a 7 color 36 inch press, a 2 color 16 inch press, and their associated propane fired dryers.

Construction shall be in accordance with the attached permit application unless otherwise stated in the general and specific conditions herein.

Attachments are as follows:

1. Guilford Gravure's letter dated December 8, 1984.
2. DER's letter dated December 28, 1984.
3. Applications to construct air pollution sources from Guilford Gravure dated May 25, 1985.
4. Robert Coleman's letter dated July 22, 1985.
5. DER's letter of completeness dated August 1, 1985.

PERMITTEE: Guilford Gravure

Permit Number: AC 10-105002
Expiration Date: April 15, 1986

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.

PERMITTEE: Guilford Gravure

Permit Number: AC 10-105002
Expiration Date: April 15, 1986

GENERAL CONDITIONS:

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:

- 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 non-compliance; 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.

PERMITTEE: Guilford Gravure

Permit Number: AC 10-105002
Expiration Date: April 15, 1986

GENERAL CONDITIONS:

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 non-compliance 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)
- () Compliance with New Source Performance Standards.

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.

PERMITTEE: Guilford Gravure

Permit Number: AC 10-105002
Expiration Date: April 15, 1986

GENERAL CONDITIONS:

- 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 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.

SPECIFIC CONDITIONS:

- 1. Continous operation of the facility will be permitted, provided emission limits are not exceeded.
- 2. VOC emissions shall not exceed the amounts indicated below:

Equipment	Emissions	
	lb/hr	TPY
Press 1 - 2 Color 14 inch	65	40
Press 2 - 7 Color 36 inch	152	66
Press 3 - 2 Color 16 inch	65	55
Total		161

PERMITTEE: Guilford Gravure

Permit Number: AC 10-105002
Expiration Date: April 15, 1986

SPECIFIC CONDITIONS:

3. Procedures to minimize VOC emissions shall include, but not limited to:

- o maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.;
- o 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;
- o all fittings, valves, lines, etc., shall be properly maintained;
- o all VOC spills shall be attended to immediately and the materials properly disposed of, recycled, etc.; and,
- o maintain a monthly accounting of the VOC per type such that the beginning inventory and deliveries are accounted for.

4. There shall be no objectionable odor on off-plant property.

5. The applicant shall investigate and apply the use of low solvent technology for reducing VOC emissions as it becomes available.

6. The emissions from the dryers shall not exceed 1 TPY for any of the pollutants NO_x, PM or VOC.

7. 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.

8. Visible emissions shall not exceed 20% opacity, using EPA Method 9, Visual Determination of the Opacity for Emissions from Stationary Sources.

9. Compliance with the particulate emission standards will be determined using EPA Method 9.

10. Compliance tests shall be performed at 90-100% of the permitted equipment capacity.

PERMITTEE: Guilford Gravure

Permit Number: AC 10-105002
Expiration Date: April 15, 1986

SPECIFIC CONDITIONS:

11. A 15 day prior notification of the compliance testing date shall be given to DER's Northeast District office.

12. Compliance test results, in accordance with Rule 17-2.700, FAC, shall be submitted to DER's Northeast District office within 45 days of completion of tests.

13. Construction shall reasonably conform to the information submitted in this application.

14. The applicant will demonstrate compliance with the conditions of this construction permit and submit a complete application for an operating permit to the Department's Northeast District office 90 days prior to the expiration date of the construction permit.

15. Upon obtaining an operating permit the applicant will be required to submit annual reports, unless otherwise requested by DER, on the actual operation and emissions of the sources to the DER's Northeast District office.

16. Any change in the method of operation, equipment, or operating hours shall be submitted for approval to the Department's Northeast District Office.

17. Any delay in the construction or completion of this project shall be reported to the DER's Northeast District office.

Issued this ___ day of _____, 1985

**STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION**

VICTORIA J. TSCHINKEL, Secretary

___ pages attached.

P 085 152 629

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse).

U.S.G.F.D. 1984-446-014

PS Form 3800, Feb. 1982

Sent to Mr. William Gunther	
Street and No.	
P.O., State and ZIP Code	
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 8/2/85	

PS Form 3811, July 1983

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.

1. Show to whom, date and address of delivery.

2. Restricted Delivery.

3. Article Addressed to:
Mr. William G. Gunther
Guilford Gravure, Inc.
Post Office Box 448
Guilford, Connecticut 06437

4. 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	Article Number P 085 152 629
--	-------------------------------------


Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
X

6. Signature - Agent
X *Goedie Vargha*

7. Date of Delivery

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



DOMESTIC RETURN RECEIPT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

August 1, 1985

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

Dear Mr. Gunther:

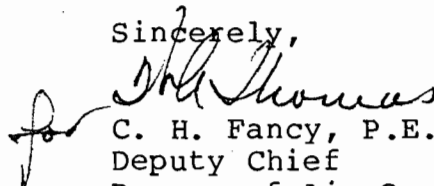
Re: Completeness Review, AC 10-105002

The department is in receipt of a letter from Robert Coleman dated July 22, 1985.

The information submitted on the sources being evaluated, completes your application for the above referenced permit.

If you have any questions, please call Pradeep Raval 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/PR/s

cc: Johnny Cole
Robert Coleman

ROBERT D COLEMAN
806 N.Ivy S.
Arlington Va 22201
(703) 243-7018

DER
JUL 29 1985
BAQM

July 22, 1985

Pardip Ravel
Engineer
State of Florida
Department of Environmental Regulation
Twin Tower Office Bldg.
2600 Blairstone Rd.
Tallahassee Florida 32301

Dear Pardip,

I enjoyed talking with you on the phone on Friday. This letter will confirm our conversation and answer your questions concerning Guilford Gravure's applications for air pollution permits at its Clay County rotogravure printing operation.

First, the existing presses have one propane fired dryer which can be used by either press. The dryer burner has a capacity of 3.2 X 10⁶ BTU/hr but, like the press itself, has a very low annual use factor. We expect that the new press will have a similar burner with a capacity of 2.5 X 10⁶ BTU/hr. Using AP-42 emission factors the existing burner has a maximum hourly emission rate of: 0.4 lbs/hr of NO_x; 0.06 lbs/hr of particulates and 0.01 lbs/hr of VOC. Using the same factors the new burner will have maximum hourly emission rate of: 0.31 lbs/hr NO_x; 0.05 lbs/hr of particulates and 0.0078 lbs/hr of VOC. On an annual basis these emissions are obviously very small and in fact both burners together emit less than one ton per year of any pollutant.

Second, the substrates currently used by the plant are paper and a light cardboard. The plant does not use any vinyl, pressure sensitive or foil substrates at this time. While we understand that plants which use these substrates may be subject to other regulations when these substrates are used in products other than packaging labels, we have taken the position that as long as our presses are used to produce package labels, there are no NSPS regulations which affect us.

Finally, we determine our solvent and ink usage on a monthly basis using a physical inventory. By knowing how much solvent and ink we use it is simple to determine our emissions.

I hope this provides you with the information you need and if I can provide any additional information, do not hesitate to contact me.

Sincerely,



Robert D Coleman

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION
INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

NORTHEAST DISTRICT, JACKSONVILLE

TO: Bill Thomas
FROM: JB John Brown
DATE: June 7, 1985
SUBJECT: Clay County - AP
 Guilford Gravure

DER
JUN 10 1985
BAQM

The enclosed permit applications (3 presses) are forwarded per your instructions on 6/6/85.

Note that checks in the amount of \$700 were deposited.

JB:vk

Reg
Reg
mit. mit

Guilford Lavure - AP

06-06-85

Checking the POP & ACP for proper
inclusion ~~results~~ revealed that the
VOC rates are

POP	40
	<u>66</u>
	106 TPY

ACP 6.5 TPY

Since over 100 TPY VOC emitted
I called B. Thomas about processing.
He is to call. *[Signature]*

6-6-85

Bob Coleman, consultant to Guilford,
(703) 243-7018 called. Requested
that request more info before 6/15 (he
will be on vac for a month). I said
will ASAP. *[Signature]*

6-6-85

B. Thomas called; he said send to
CAPS for processing. *[Signature]*

DER

JUN 10 1985

BAQM

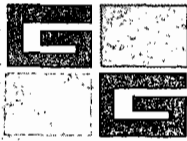
Gay Co. - AP
Lindford

05-07-85

Bob Coleman called; we discussed
the AOP & ACP he is preparing.

2 existing presses ~~in~~ ⁱⁿ one AOP
per \$200 max 80 TPY

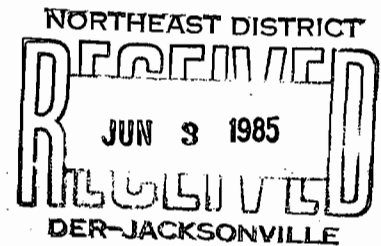
✓ 1 new press ACP ~ 40 TPY
②



GUILFORD GRAVURE

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

(203) 453-4334 TELEEX: 64-8413111



May 25, 1985

Mr. John Brown, P.E.
Supervisor Air Section
State of Florida
Department of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, FL 32207

Re: Guilford Gravure, Inc.

Dear Mr. Brown:

I have enclosed two completed permit applications for Guilford Gravure's plant in Clay County. One application is an operating permit application for our two existing presses. Based upon our discussion it is my understanding that you requested this application solely for the purpose of providing the state with information on the emissions from our plant, and we agreed to file the application for that purpose.

The second permit application is a construction permit for a new press that, as we also discussed, we intend to use at our facility. As described in the application this press is a very small emission source and will not have any adverse impact on air quality.

Further, as you also requested for informational purposes, we will supply you with quarterly estimates of emissions for each press beginning with the July 1, 1985 quarter. Data provided will include: total solvent used; amount of each ink used, the VOC content of each ink and the emissions associated with each ink. Usage will be based on the inventory method, i.e. usage is determined from the inventory at the beginning of the quarter minus the quarter ending inventory plus purchases. We feel that this will provide you with an accurate reporting of VOC emissions from our presses.

GUILFORD GRAVURE

Mr. John Brown ,P.E.
May 25, 1985
Page 2

Obviously, Guilford Gravure seeks to cooperate fully with the State and I trust that these applications provide you with all of the information you requested. Should you have any questions, please do not hesitate to call me.

Sincerely,

GUILFORD GRAVURE, INC.



William G. Gunther
Vice President

WGG:gv
Encls.

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

REMITTANCE ADVICE					

51-10
111
11464

(Microfilm barcode)

PAY _____ DOLLARS

TO THE ORDER OF	DATE	GROSS	DISC.	CODE NUMBER	CHECK NO.	CHECK AMOUNT
Dept of Environmental Regulation	5/28/85	500 00		40	11464	500 00

UNION TRUST COMPANY
NEW HAVEN, CONNECTICUT

(Handwritten signature)

VICE PRESIDENT

||| _____

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Nº 91855

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Midland Marine Corp Date June 4, 1985

Address P.O. Box 812 Bradford Conn 06405 Dollars \$ 500.00

Applicant Name & Address Telephone Service, P.O. Box 448 New Canaan Conn

Source of Revenue Midland Marine 2 Calc Press

Revenue Code 001031 CO # 11464 Application Number AC 10-105002

By Wanda Boag

GUILFORD GRAVURE CORP.

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

REMITTANCE ADVICE					

51-10
111

11465

Handwritten: 200 00 200

PAY

DOLLARS

TO THE ORDER OF	DATE	GROSS		DISC.	CODE NUMBER	CHECK NO.	CHECK AMOUNT
<i>Dept of Environmental Regulation</i>	<i>5/28/85</i>	<i>200</i>	<i>00</i>		<i>40</i>	<i>11465</i>	<i>200 00</i>

UNION TRUST COMPANY
NEW HAVEN, CONNECTICUT

Maurice Axel
VICE PRESIDENT



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Nº 91854

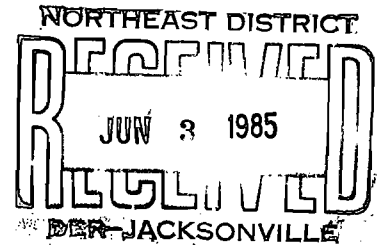
RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Hollyford Mfg. Corp Date June 17, 1985
Address 750 E. Main St P.O. Box 812 Raymond Dollars \$ 200.00
Applicant Name & Address William J. Conn 06405
William J. Conn P.O. Box 448 Hollyford Ct 06437
Source of Revenue Hollyford Mfg. Corp - Jec. Press
Revenue Code 00172 Ch.# 11465 Application Number AD 10-105000

1 sig OK Mrs Borges

By Vera Beel

GUILFORD GRAVURE



APPLICATION TO OPERATE
ROTOGRAVURE PACKAGING
PRINTING PRESSES

Prepared For:

State of Florida
Department of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida

Prepared By:

Guilford Gravure
1272 Harbor Road
Green Cove Springs, Florida 32043

GUILFORD GRAVURE

PRELIMINARY STATEMENT

This package is an application for an operating permit for two rotogravure packaging printing presses at Guilford Gravure's plant in Green Cove Springs, Florida. These operating permit applications are submitted in response to a request from Mr. John Brown, Supervisor Air Section, Northeast District of the State of Florida Department of Environmental Regulation.

Guilford Gravure is submitting these applications even though it was specifically exempted from permitting requirements by the Department in 1980. This 1980 exemption was based on the small size and location of the source. It is Guilford Gravure's understanding that the information requested in the operating permit application is for the purpose of providing the Department with information on the emissions from minor sources in its area of responsibility and it is not the intention of the Department to require additional control since the plant is, as was described in 1980, a small VOC source located in an ozone attainment area. The company does, however, recognize that the information submitted in this application concerning hours of operation and emission rates represents the maximum conditions under which the plant may operate and that any change in these conditions would require approval from the State of Florida.

BACKGROUND

The Guilford Gravure plant in Green Cove Springs is a small rotogravure printing plant serving the packaging needs of the beverage industry. The plant was constructed in 1979 and currently has two rotogravure presses. One press is a two color 14 inch press used mainly for producing tea labels and the other is a 36 inch seven color press used for a variety of labels including many for the liquor industry.

During 1984 the plant produced in excess of 3.1 billion labels. As with plants in the rotogravure packaging industry the plant's operation is characterized by a large amount of downtime (needed to change from one product line to another) and the use of a large number of different inks and solvents. To produce its product line the plant uses over 25 different inks, solvents, and varnishes.

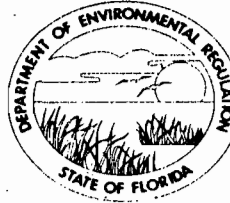
GUILFORD GRAVURE

The gravure inks which are used are a mixture of ink pigments and resins, metallic powders, and VOC solvents. Additional VOC solvents are used to maintain the viscosity needed for printing. At maximum production rates the plant in its current configuration expects to use about 153,000 lbs of inks a year and a like amount of solvents. Maximum emissions from the plant in its current configuration are less than 110 tons per year.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207



NORTHEAST DISTRICT
RECEIVED
JUN 3 1985
RECEIVED
DER-JACKSONVILLE

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

G. DOUG DUTTON
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Rotogravure Packaging Printing [] New¹ [X] Existing¹

APPLICATION TYPE: [] Construction [] Operation [] 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) Tea Press + 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 Gunther, Vice President

APPLICANT ADDRESS: P.O. Box 448, Guilford, CT 06437

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 OPERATING PERMIT 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, Vice President
Name and Title (Please Type)

Date: 5/28/85 Telephone No. (203)453-4334

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

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

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

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

Signed James R. Reid
James R. Reid

Name (Please Type)
(Independent)

Company Name (Please Type)
6746 Winterset Gardens Rd, Winter Haven, Fla. 33880

Mailing Address (Please Type)

Florida Registration No. P.E.0019174 Date: 5/30/85 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 N/A

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.

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		
Tea Press Ink	VOC	62	40	Point #2
Tea Press Solvent	VOC	100	40	Point #2
7 Color Press Ink	VOC	60	80	Point #2
7 Color Press Solvent	VOC	100	112	Point #2

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 ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
VOC-Tea Press	65	40	N/A	65	65	40	Fugitive
VOC 7 Color	152	66	N/A	152	152	66	Fugitive

¹See Section V, Item 2.

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

³Calculated from operating rate and applicable standard.

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

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.

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) ³	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) _____

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: N/A
 Density: N/A lbs/gal Typical Percent Nitrogen: _____
 Heat Capacity: _____ BTU/lb _____ BTU/gal
 Other Fuel Contaminants (which may cause air pollution): None

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

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.

* As applicable, information and diagrams requested by these Supplemental Requirements are attached.

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

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

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

*Explain method of determining

BASIS OF EMISSIONS ESTIMATES

All emission estimates are based on the assumption that all VOC in the ink and solvent will be emitted to the atmosphere. Solvents are assumed to be 100% VOC. VOC contained in the ink is based on data from our ink suppliers. For the two color press the average VOC content of all ink purchased in 1984 was 62%. For our seven color press the average VOC content of all inks used was 50%.

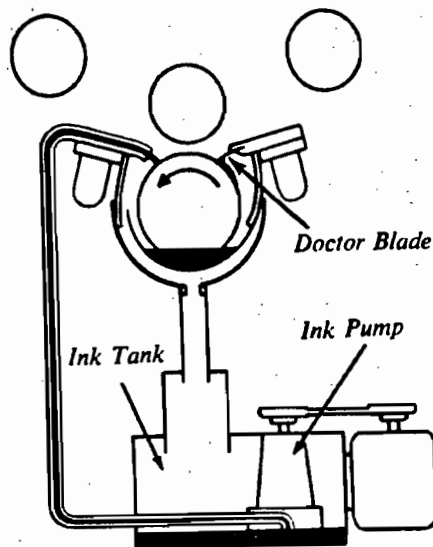
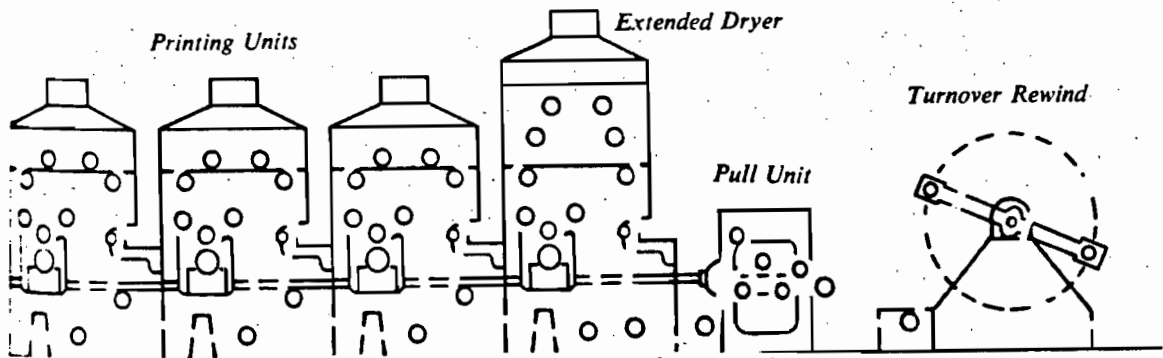
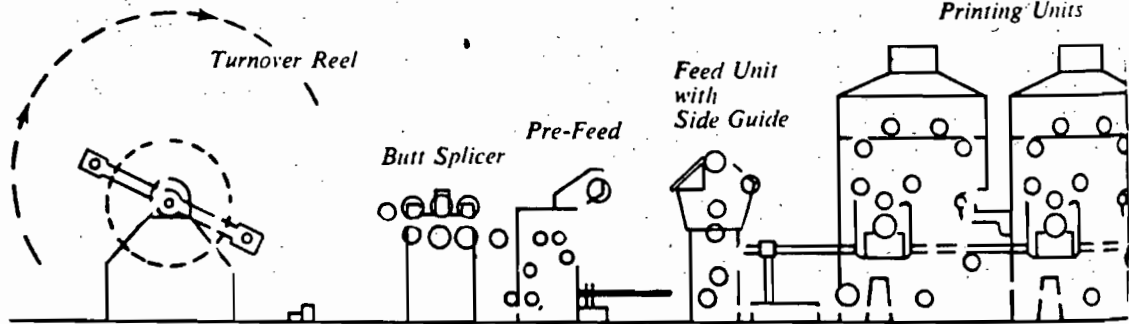
Solvent usage for both presses may be as high as one pound of solvent per pound of ink. Total ink usage on a peak hourly basis is much higher than the average hour because of the very high downtime associated with our operation. Maximum hourly ink usage is based on maximum ink usage which can possibly be fed into the machine assuming complete coverage of the substrate. This emission rate which is shown in Section II Item C of the application is reached very infrequently. The annual emissions shown in the same section reflect the much lower average hourly emission rates. Annual emissions are based on our best estimate of usage at realistic maximum operation rates.

GUILFORD GRAVURE

FLOW DIAGRAM

Attached is a flow diagram of a typical rotogravure printing press. The presses at our plant have 2 and 7 printing units but otherwise the flow of the paper and the application of the ink are identical to the press shown.

Emissions from the process are the result of VOC's contained in the ink and solvents added to the ink to maintain the proper viscosity. The solvents act as a carrier for the solid material in the ink and allow the ink to be transferred to the substrate. The solvent is evaporated in the dryers leaving the ink solids behind.



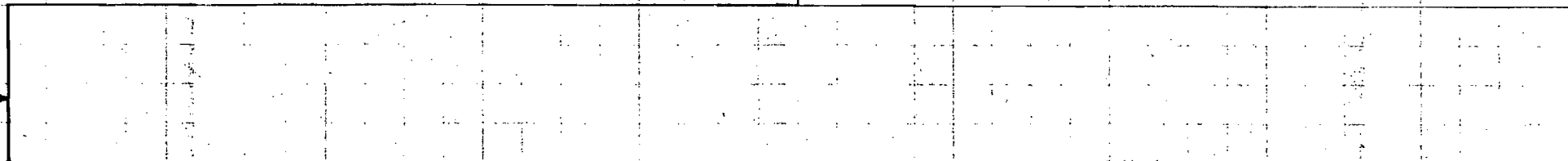
3 Ink pump, tank and ink applicator showing flow of ink to etched gravure cylinder. The web is printed where gravure cylinder and impression cylinder are closest.

Tec Press Flow Diagram

VOC's



Paper Board



Printed Material

Inks:

Tatley Blue (T-type)
Extender (T-type)

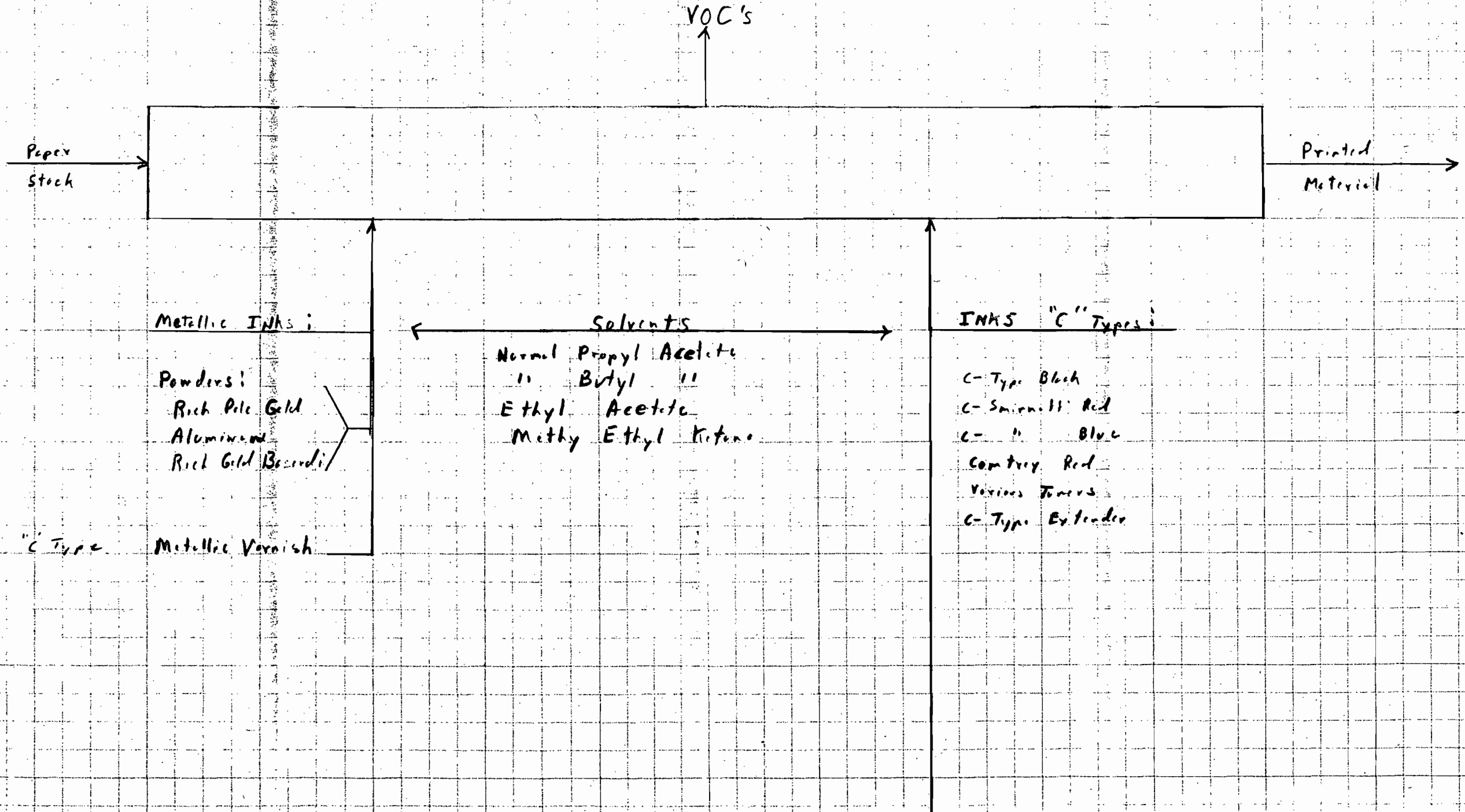
Solida Red (C-type)
Extender (C-type)

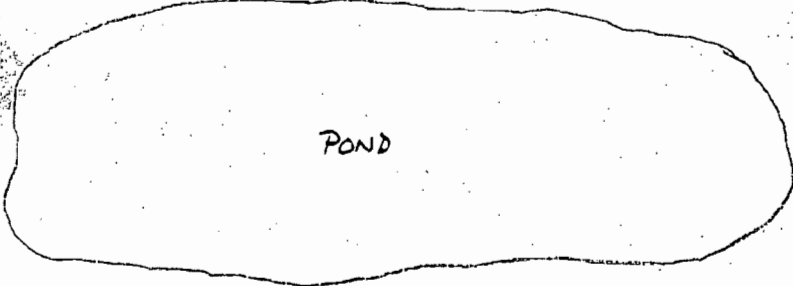
Solvents:

Toluene
Ethyl Acetate

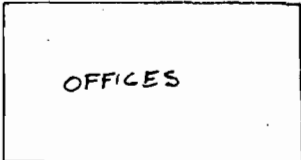


7-Color Press Flow Diagram





POND



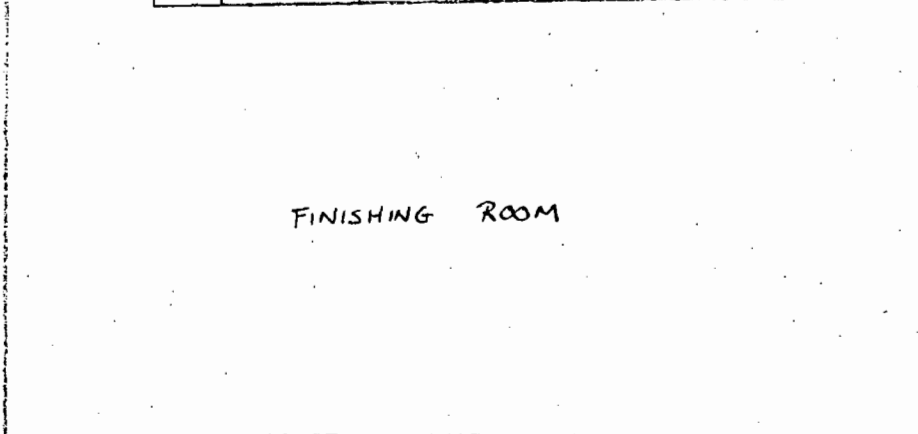
OFFICES



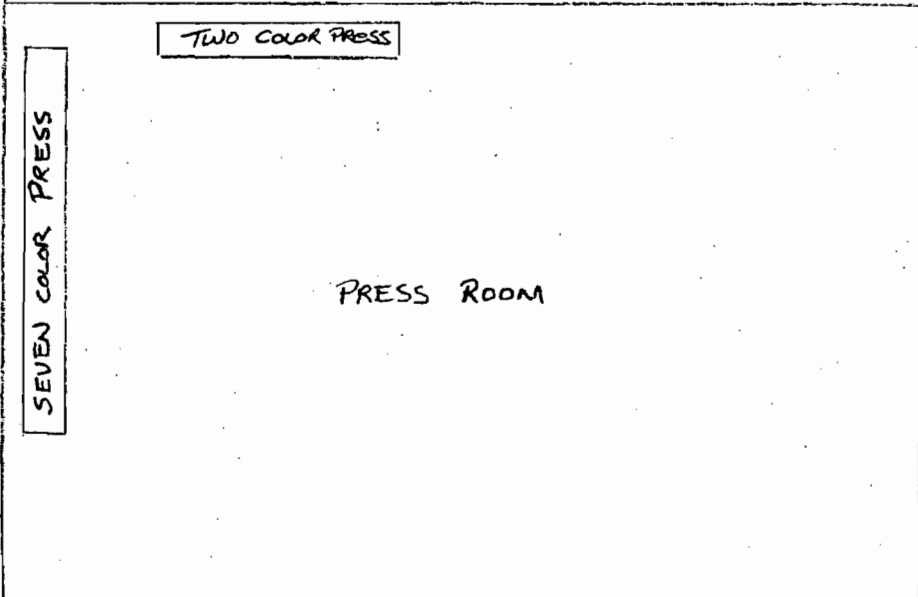
WASH ROOMS



CAFETERIA



FINISHING ROOM



PRESS ROOM

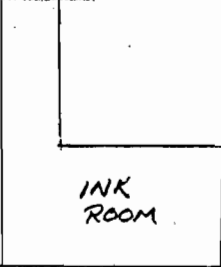
SEVEN COLOR PRESS

TWO COLOR PRESS

HARBOR ROAD

PARKING

TRUCK LOADING



INK ROOM

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

G. DOUG DUTTON
DISTRICT MANAGER

December 28, 1984

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

file

Dear Mr. Gunther:

Clay County - AP
Guilford Gravure, Inc.

This letter is in response to your letter of December 8, 1984. The following actions are required. Please refer to Florida Administrative Code Rules 17-2.210, 17-2.520 and 17-2.620, enclosed:

1. Submit an application for an air construction permit for the new press in sufficient time to facilitate issuance of the application prior to beginning construction. A minimum of 90 days lead time is recommended. A statement from the equipment (press) manufacturer regarding the availability of any standard add-on equipment for VOC emissions control is required with the permit application for the new press. If such standard equipment exists it shall be utilized.
2. Submit application(s) for operation permits for any existing VOC source(s) that will remain after June 1, 1985 or when the new press is installed, whichever comes earlier. These shall be submitted by March 1, 1985.
3. Submit with your permit application a method to accurately determine VOC emissions on a quarterly basis. Quarterly reports of such emissions will be required for all sources. (You may elect to do this as presented in 40 CFR, Subpart QQ; however, we shall consider other methods).

This procedure has been coordinated with the Bureau of Air Quality, DER, Tallahassee.

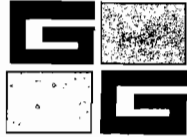
Thank you for your cooperation.

Sincerely,

John Brown Jr.
John Brown, P.E.
Supervisor Air Section

JB:vk

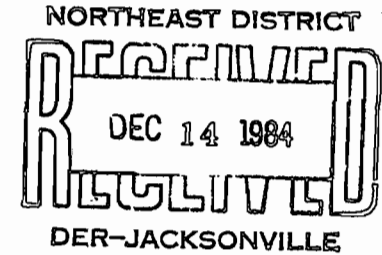
Enclosures: 17-2, 17-4, applications
cc: Bill Thomas, BAQM



GUILFORD GRAVURE, INC.

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(203) 453-4334 TELEX: 64-3111



December 8, 1984

Mr. John C. Brown, Jr.
State of Florida
Department of Environmental Regulation
3426 Bills Road
Jacksonville, Florida 32207

Dear Mr. Brown:

As we discussed in our last telephone conversation, we are awaiting feedback from you on the issue of permitting requirements for our replacement press in Green Cove Springs. I did want to reaffirm one thing that came up in our last discussion. This is that, as we outlined in our first meeting, the emission capacity of the replacement press is identical to that of the press currently in production.

I will look forward to hearing from you when your department has reached its conclusion.

Sincerely,

GUILFORD GRAVURE, INC.

William G. Gunther
Vice President

WGG:gv