



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

July 25, 1994

Mr. Douglas Turner  
Plant Manager  
D-Graphics  
3389 Powers Avenue  
Jacksonville, Florida 32207

RE: Request for Permit Amendment  
D-Graphics, Jacksonville, Florida

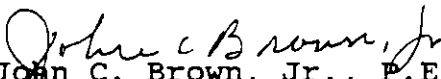
Dear Mr. Turner:

The Department has considered your request to move press number 4. Based on the fact that the press has not operated for four years the actual emissions are zero as defined at 17-212.200(2), F.A.C. Therefore, independent of the existing permit it will be necessary to submit an application sealed by a registered professional engineer and accompanied by a proper processing fee.

There is no rule which prohibits your disassembling the existing press. However, taking any action to "commence construction" as defined at Rule 17-212.200(19), F.A.C., is prohibited by Rule 17-210.300(1), F.A.C.

No action can be taken upon your request until an application with proper fees is received.

Sincerely,

  
John C. Brown, Jr., P.E.  
Administrator  
Air Permitting and Standards

JCB/bjb



D-GRAPHICS

A DIVISION OF JEFFERSON SMURFIT CORPORATION

Consumer Packaging Division

3389 POWERS AVENUE  
JACKSONVILLE, FL 32207  
TELEPHONE 904/733-4020

July 20, 1994

Mr. John Brown, P.E.  
P.E. Administrator  
Permitting and Standards Section  
Division of Air Resources and Management  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED

JUL 21 1994

Bureau of  
Air Regulation

RE: Request for Permit Amendment  
D-Graphics, Jacksonville, Florida

Dear Mr. Brown:

Thank you for including time in your busy schedule to consider the requests and concerns of D-Graphics in recent weeks. We feel discussions of this type will serve to expedite the process of resolving our air permit situation. Our goal in this effort is to fully comply with FDEP's and EPA's permit regulations while maintaining our business competitiveness, which we believe are compatible interests.

D-Graphics's most immediate need within this complex process is to receive permission to move and reactivate Press #4 to its new location next to Press #5 described in the enclosed drawing (Attachment A). This need became critical over the past year as we experienced a substantial increase in business. We currently have customer demands that exceed the normal capacity of Press #5 and anticipate this growth to continue. If our customer demands are not met, D-Graphics may lose business, and could jeopardize our position in the market.

A special request for the capital expenditure to address this need was presented to corporate headquarters and approval was granted almost immediately. This substantial increase in business was not anticipated when establishing the original timetable for resolving the air permit issues. We expected to have time to first obtain approval for alternate testing procedures, then proceed to obtain revised construction permits and operating permits. The decision by D-Graphics to relocate and reactivate Press #4 now was based on this substantial increase in the demand for our specialized labels, and any delay in implementing this move could have serious negative business impacts on our facility.

Considering our mutual desire to resolve the permitting issue and D-Graphics's need to quickly make Press #4 operable, we propose the following steps to meet these goals. This proposal recognizes that D-Graphics's presses are a "major" source subject to federally enforceable emission limits. This move will physically require reassembly of Press #4 in the new location; construction of a concrete foundation for Press #4; reattachment of the exhaust ductwork; and reinstallation of support functions such as electricity and controls.

For permission to accomplish the move, we propose an administrative amendment to General Condition #2 of permit #AC16-093347 (permit) to allow Press #4 to be relocated parallel and adjacent to, and in the same building as, Press #5, which is 74 feet from its current location. Allowable emissions would not increase at the location. This change will not be a major modification as defined in Rule 17-212.200(46), F.A.C., because there will not be an increase in actual emissions as a result of moving Press #4. This is supported by three reasons.

1. Press #4 will be more efficient after reactivation, which will consist of routine repair, maintenance, and component part replacement.
2. The catalytic incinerator used for controlling VOC emissions from the presses was recently upgraded and improved, and is capable of controlling emissions from both presses.
3. Because Press #4 has not operated for over four years due to poor market conditions, FDEP and the City of Jacksonville have not required annual emission testing; therefore, no test data for the last five years is available. Rule 17-212.200(2)(b), F.A.C., allows FDEP to presume that actual emissions equal allowable emissions in the absence of test data, if the source is subject to federally enforceable emission limits. If actual emissions are presumed to equal allowable emissions prior to the revision, then actual emissions will not have increased due to the revision as long as they do not exceed allowable emissions after the revision.

We believe that under Rule 17-2.100(53)(C), F.A.C., D-Graphics can begin to disassemble and undertake preparatory activities related to the relocation, even before the permit is amended.

In order to demonstrate compliance after Press #4 is moved and reactivated, D-Graphics proposes to conduct compliance tests on Presses #4 and #5 using currently accepted test procedures within 60 days of startup of Press #4.

The cost to complete this project is estimated at \$1,032,000 (Attachment B). This amount is approximately thirty-three percent of the cost of a new press (Attachment C); therefore, the reactivation of Press #4 will not cause the press to become subject to New Source Performance Standards, as either a modification or reconstruction.

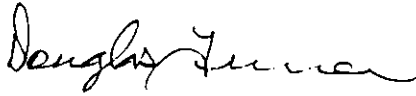
Simultaneous with this request, D-Graphics will pursue approval of appropriate testing procedures, and a new construction permit that incorporates both presses into one permit and more accurately defines the current operating conditions of the facility. The application for the new construction permit will be submitted to your office within 15 days of approval by FDEP of acceptable test procedures.

In summary, we are pursuing this proposal because we need to expeditiously upgrade and reactivate Press #4 in order to meet our customer's requirements. At the same time we completely support and share FDEP's desire to resolve D-Graphics's outstanding permit issue. We feel this proposal can reasonably satisfy both these goals within the regulations.

Thank you again for your attention and consideration in this matter. In an effort to make our project and policies as clear as possible for you and others involved in this issue, we cordially invite you meet with us at our facility in

Jacksonville at your convenience. I will contact you within the next few days to set a time and date for a meeting, and to answer any questions you may have.

Sincerely,

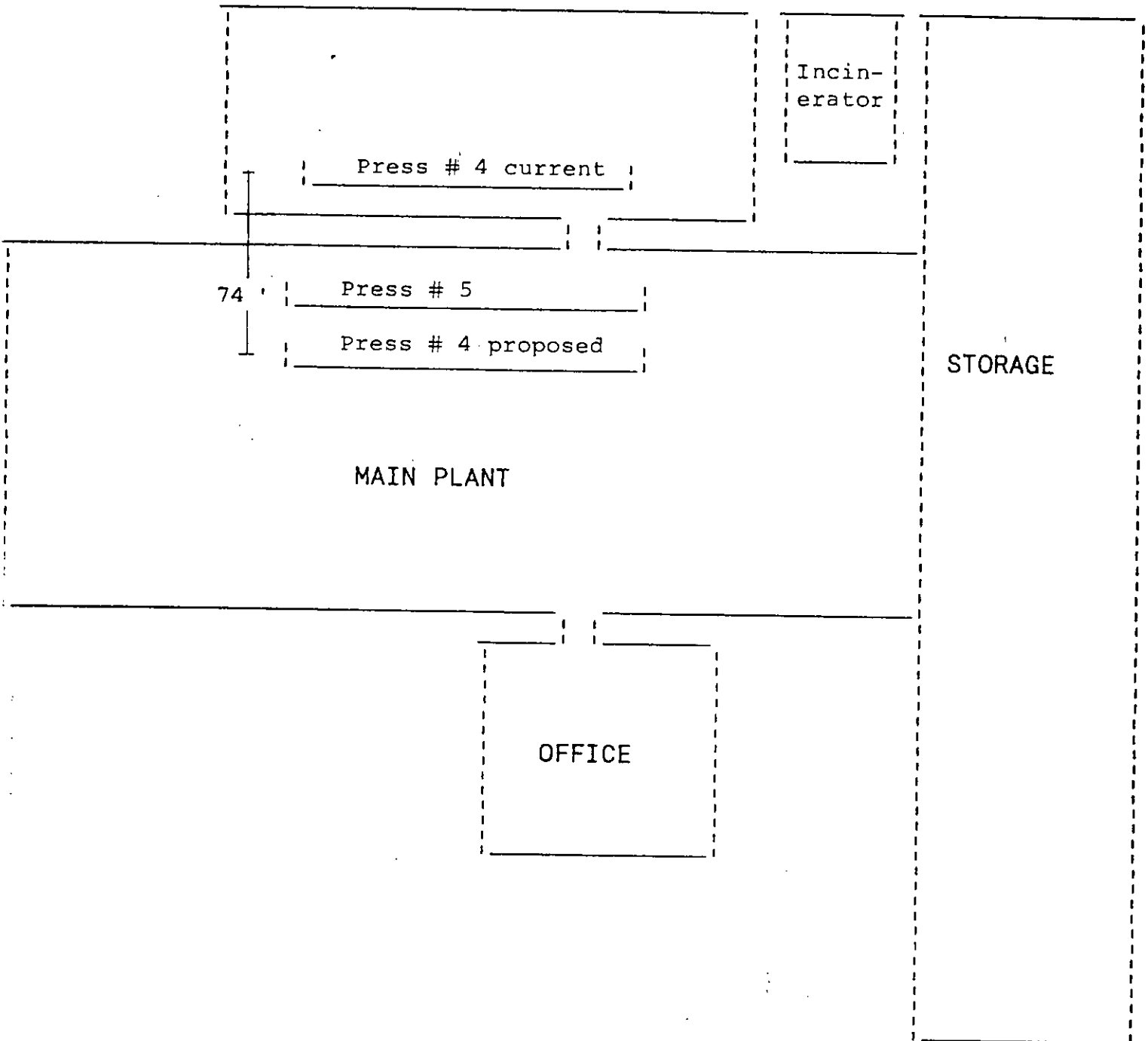
A handwritten signature in cursive script that reads "Douglas Turner".

Douglas Turner  
Plant Manager

Enclosures

cc: Mr. R. Steven Pace, P.E., RESD  
Mr. James L. Manning, P.E.

D-Graphics Facility Layout





D-GRAPHICS

ATTACHMENT B

A DIVISION OF JEFFERSON SMURFIT CORPORATION

Consumer Packaging Division

3389 POWERS AVENUE  
JACKSONVILLE, FL 32207  
TELEPHONE 904/733-4020

JACKSONVILLE PRESS #4 PROJECT COST ESTIMATES  
(IN THOUSANDS)

	MATERIAL	LABOR	TOTAL
ELECTRICAL		125	125
FOUNDATION - CONCRETE WORK	12		12
HEATER CONTROLS & BURNERS	121		121
RELOCATION OF ROOF FANS		19	19
DUCT WORK BELOW ROOF	59	6	65
FLAME SUPERVISORS	32		32
REGISTER CONTROL	149	30	179
SCANNER-VIDEO SYSTEM	65	4	69
UPGRADE REWIND	15		15
NEW CHILL ROLLS & DRIVE	27	5	32
DOCTOR BLADE OSCI. CONTROLS	4		4
LEL MONITOR	5	2	7
INK FOUNTAIN & PUMPS	21		21
IMPRESSION ROLLERS	10		10
AIR COMPRESSORS	25	5	30
IDLER ROLLERS	9		9
REFURBISH DOCTOR BLADE ASSM	15		15
DRIVE GEARS FOR CYLINDERS	4		4
PLUMBING FOR CHILL UNIT	4	1	5
LIGHTS, HEATERS, AND FANS	8	2	10
MISC. BEARINGS	15		15
DRUM PUMP SYSTEMS	4		4
CRANE RENTAL	5		5
CLEANING & PAINTING	19		19
BALANCE FANS	10		10
TRAVEL FOR INSTALLERS	74		74
TAX - 6.5%	72		72
CONTINGENCY- 5 %	49		49
	-----	-----	-----
	833	199	1032

DINAGRAPHS, INC.  
Cincinnati, OH

Proposal No. FP-1794  
SCHIAVI PRINTING EQUIPMENT

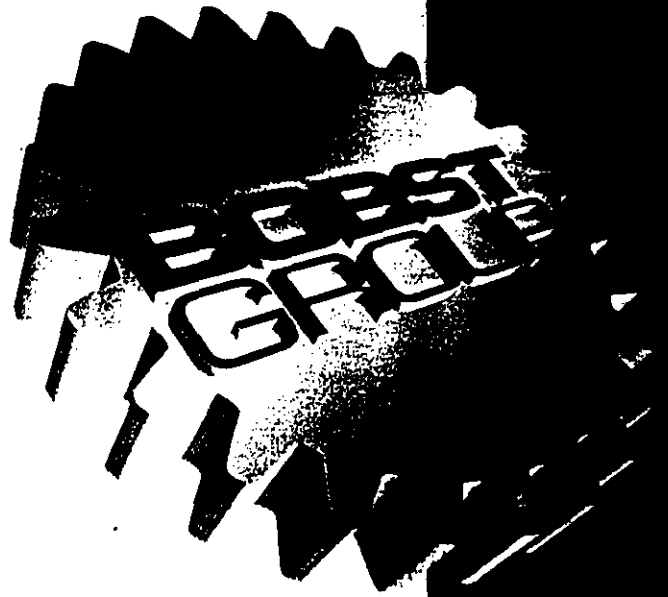
PATRIOT ROTOGRAVURE PRINTING PRESS

BOBST  
CHAMPLAIN

BOBST  
REGISTRON

SCHIAVI

SCHIAVI-PADANE



ACCORDING TO THE GENERAL TERMS AND CONDITIONS OF SALE ENCLOSED, PLEASE FIND BELOW OUR PROPOSAL FOR A TEN (10) COLOR, 36 INCH WIDE MODEL PATRIOT ROTOGRAVURE PRINTING PRESS PER DRAWING SR 50524:

1.0 GENERAL SPECIFICATION

- 1.1 Number of printing units .....8
- 1.2 Max. working width .....30 inch  
Max. web width .....32 inch
- 1.3 Printing cylinder repeat:
  - min..... 18 inch
  - max .....38 inch
- 1.4 Max. mechanical speed.....1200 F.P.M.
- 1.5 Web tension adjustment range ..... (8 - 80 lbs)
- 1.6 Web running direction: From right to left
- 1.7 Unwinder:
  - Max reel diameter ..... 40 inch
  - Inside core diameter ..... 3 inch
- 1.8 Rewinder:
  - max. reel diameter ..... 40 inch
  - inside core diameter ..... 6 inch
- 1.9 Materials to be processed:

The machine can handle, for instance, the following substrates provided they are of good quality:

Paper and films to be specified by Buyer.





3.13 All shipping costs to bring the machine to Dinagraphics loading dock, including duty.

4.0 GENERAL TECHNICAL INFORMATION

4.1 Auxiliary voltage: 110 V - 60 Hz.

4.2 Control-panels: Schiavi standard

4.3 Color: - RAL 7000 (dark gray): frame and castings  
- RAL 7038 (light gray): drying chambers, tunnel, control desk  
- RAL 1028 (orange): moving parts, unwinders and rewinders, trolleys, fairings, printing units.

4.4 The installation should be fed as follows:

- 440 V threephased 60 cycles
- 100 P.S.I. dry compressed air
- 10-12°C cooling water

Along with machine general layout will also be delivered all necessary specifications for pre-arrangement of all recommended connections for a good operation of the installation.

Upon Buyer's request and subject to extra cost, engineering and drawings for equipment not identified in the proposal could be supplied for alternate arrangements of the machine.

\* The manufacturer reserves the right to carry out at any time any modification whatsoever he deems necessary for the improvement of machine features, if mutually agreed upon by both parties.

BUDGET PRICE FOR THE ABOVE DESCRIBED MACHINE AND SERVICE ..... \$3,108,000.00

DEPARTMENT OF REGULATORY &  
ENVIRONMENTAL SERVICES  
Air Quality Division

June 21, 1994

Mr. Douglas Turner, Plant Manager  
D-Graphics  
3389 Powers Avenue  
Jacksonville, Florida 32207

RE: Duval County - Air Pollution  
D-Graphics  
No. 5 Press  
Annual Emissions Test

Dear Mr. Turner:

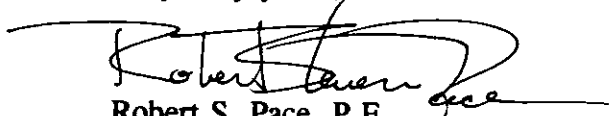
The City of Jacksonville, Air Quality Division (AQD), as a Florida Department of Environmental Protection (DEP) approved local air pollution control program, has reviewed your letter, dated June 16, 1994.

In accordance with Florida Administrative Code (FAC) Rule 17-297.340, Frequency of Compliance Tests, AQD approves your request for an extension of time until September 30, 1994 to conduct the annual emissions testing for Press No. 5.

This approval for an extension of time to conduct emissions testing does not relieve the referenced source facility from any other requirements of Chapter 403, Florida Statutes; DEP FAC Rules; Title X, Jacksonville Ordinance Code; or Jacksonville Environmental Protection Board Rules.

Should you have any questions concerning this matter, please contact Mr. Wayne Tutt at (904) 630-3484.

Very truly yours,

  
Robert S. Pace, P.E.  
Division Chief

RSP/RLR/sa

- c: Mr. Robert Leetch, P.E., DEP/NED
- ✓ Mr. Charles Logan, DEP/Tallahassee
- Mr. Wayne Tutt, AQD
- Mr. James Manning, P.E.
- AQD File 1120G
- AQD Air Permitting File

Copy for:  
Patty  
GPL  
~~Charles~~  
Return to Logan



RECEIVED

JUN 24 1994

Bureau of  
Air Regulation



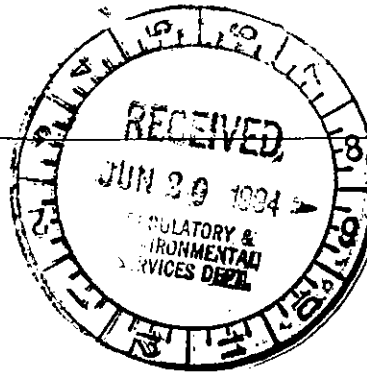
421 West Church Street - Suite 412  
Jacksonville, Florida 32202-4111

Area Code 904/630-3666



**D-GRAPHICS**

A DIVISION OF JEFFERSON SMURFIT CORPORATION



**Consumer Packaging Division**

389 POWERS AVENUE  
JACKSONVILLE, FL 32207  
TELEPHONE 904/733-4020

June 16, 1994

Mr. R. Steven Pace, P.E., Chief  
Air Quality Division  
Regulatory and Environmental Services Department  
421 West Church Street, Suite 412  
Jacksonville, Florida 32202

RE: Annual Emissions Test

Dear Mr. Pace:

In reference to our recent communications regarding D-Graphics' annual emissions testing obligations for Press No. 5, we respectfully request an extension on the due date until September 30, 1994. We understand this is within your authority and that the Air Quality Division (AQD) is willing to approve this request.

As you recall this request stems from the recent decision to move, refurbish, and restart Press No. 4, which will need to be tested simultaneously with Press No. 5 upon startup. As you suggested, we have contacted FDEP to resolve any permit amendments that may be required to move Press No. 4. An extension on the date for testing Press No. 5 will provide time for the AQD, the FDEP, and D-Graphics to determine the proper permit and testing procedures necessary in this situation. It may also prevent D-Graphics from having to conduct the expensive test on Press No. 5 twice within a short period of time.

Thank you in advance for your attention to this very important matter. If you have any questions or need further information, please call me at 733-4020.

Sincerely,

Douglas Turner  
Plant Manager

cc: Charles Logan, FDEP  
James L. Manning, P.E.



D-GRAPHICS

A DIVISION OF JEFFERSON SMURFIT CORPORATION

Consumer Packaging Division

3389 POWERS AVENUE  
JACKSONVILLE, FL 32207  
TELEPHONE 904/733-4020

August 4, 1993

RECEIVED

AUG 08 1993

John Brown  
Division of Air Resources Management  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Division of Air  
Resources Management

RE: Air Operating Permits AO16-118644,  
and AO16-118645

Dear Mr. Brown:

The purpose of this letter is to inform you that we have recently obtained a draft copy of the proposed operating permits for our facility and are in the process of reviewing them at this time.

As soon as we have completed our review we will be setting up a meeting with the City of Jacksonville to discuss the specific conditions in the operating permits.

It is our wish to resolve any outstanding issues with the operating permits and for this facility to be issued updated permits.

I look forward to working with Department and the City of Jacksonville in a cooperative manner to resolve these issues.

Sincerely,

D-Graphics

Doug Turner  
Plant Manager

Preston? Please  
assign someone to  
this - I'd like to  
brief you & the person  
selected. JTB

What is the assignment -  
1 hour or 100?  
What is the project?  
Can we talk - find?  
Preston 5/11