



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

To: Howard Rhodes

From: Clair Fancy

Date: November 9, 1995

Subject: Approval of Construction Permit Amendment
AC 16-261912 (A)
D-Graphics Division

Attached for your approval and signature is an amendment to a construction permit prepared by the Bureau of Air Regulation for the Jefferson Smurfit Corporation, D-Graphics Division. The purpose of this amendment is to simplify the reporting requirements by eliminating multiple VOC substrate loading limits and lowering the individual hourly VOC substrate loading limits for the No. 4 and No. 5 rotogravure presses to a common value. This amendment will not cause an increase in annual allowable emission limits or result in any equipment change.

This amendment is recommended for your approval and signature.

CF/CSL



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November 9, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Douglas V. Turner
Plant Manager
D-Graphics Division
3389 Powers Avenue
Jacksonville, Florida 32231

Dear Mr. Turner:

RE: Amendment to Construction Permit
AC 16-261912 (A)
D-Graphics

The Department has reviewed your request to simplify the reporting requirements by eliminating multiple VOC substrate loading limits and lowering the individual hourly VOC substrate loading limits for each rotogravure press to a common value. The request would lower the allowable VOC substrate loading emission limit from 350 lbs/hr for the No. 4 press and 450 lbs/hr for the No. 5 press to 287.5 lbs/hr. for each press. The Department's determination on these amendment requests are as follows:

A. Emission Limits and Reporting Requirements

Specific Condition No. 10 is amended as follows:

FROM

10. After the TES is operational and in compliance, the permittee shall maintain a log book at the facility for each press for recording the date(s) and the actual starting and ending times (i.e., hour, minute, and a.m. or p.m.) of each press's printing job, from which the actual net "run time" (RT) in hours can be verified and tabulated; and, the following formula shall be used to assess the total actual VOC emissions from the facility:

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$$\frac{\#4 \text{ RT} \times 17.5 \text{ lbs/hr} + \#5 \text{ RT} \times 22.5 \text{ lbs/hr} + \#4 \ \& \ \#5 \text{ RT} \times 28.8 \text{ lbs/hr}}{2000} < 95.0 \text{ Tons}$$

Note: The notation "#4 & #5" is the concurrent operation of the two presses.

The permittee shall notify the Duval County's R&ESD office in writing once the facility achieves 85 tons of VOC emissions; and, the VOC emissions shall be assessed on a weekly basis, thereafter.

TO

10. After the TES is operational and in compliance, the permittee shall maintain a log book at the facility for recording the actual run hours of each press on a daily basis, from which the actual net "run time" (RT) in hours can be tabulated and verified. The permittee shall notify the Duval County's R&ESD office in writing once the facility achieves 85 tons of VOC emissions; and, the VOC emissions shall be assessed on a weekly basis, thereafter.

Specific Condition No. 11 is amended as follows:

FROM

11. When both presses are being operated concurrently, the maximum allowable VOC's being applied to the substrate shall not exceed 575 lbs/hr and the maximum allowable VOC emissions from the facility shall not exceed 28.8 lbs/hr and 95.0 TPY.

TO

11. The combined maximum allowable VOC substrate loading at the No. 4 and No. 5 presses shall not exceed 575 lbs/hr (287.5 lbs/hr/press) and the maximum allowable VOC emissions from the facility shall not exceed 28.8 lbs/hr and 95.0 TPY.

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Specific Condition No.12 is amended as follows;

FROM

12. If only the No. 4 press is being operated, the maximum allowable VOC's applied to the substrate shall not exceed 350 lbs/hr.

TO

12. The maximum allowable VOC substrate loading at the No. 4 press shall not exceed 287.5 lbs/hr.

Specific Condition No.13 is amended as follows;

FROM

13. If only the No. 5 press is being operated at the facility, the maximum allowable VOC applied to the substrate shall not exceed 450 lbs/hr.

TO

13. The maximum allowable VOC substrate loading at the No. 5 press shall not exceed 287.5 lbs/hr.

Specific Condition No. 17 is amended as follows;

FROM

17. The initial and subsequent compliance tests shall be performed at maximum operating conditions for a single press (the No. 4 press and the No. 5 press operating independently of the other) and multiple press operations (the No. 4 press and the No. 5 press operating concurrently), for a total of three separate compliance tests. The initial compliance tests on the No. 4 press shall be

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conducted within 60 days after initial start-up of the press. A 95% total destruction of all VOC emissions delivered to the inlet of the catalytic oxidizing system shall be demonstrated by these compliance tests.

TO

17. The initial and subsequent compliance tests shall be performed at maximum operating conditions for a single press (the No. 4 press and the No. 5 press operating independently of the other), for a total of two separate compliance tests. The initial compliance tests on the No. 4 press shall be conducted within 60 days after initial start-up of the press. A 95% total destruction of all VOC emissions delivered to the inlet of the catalytic oxidizing system shall be demonstrated by these compliance tests.

B. Attachments to be Incorporated;

- D-Graphics Division letter dated October 3, 1995

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

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The Petition shall contain the following information:

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

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

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

This letter amendment must be attached to Construction Permit No. AC 16-261912 as No. AC-16-261912 (A), and shall become part of the permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/CSL

Attachment

cc: J. Manning, R&ESD
C. Kirts, NED
J. Harper, EPA
J. Bunyak, NPS

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 11-13-95 to the listed persons.

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

Kuni Jober 11-13-95
Clerk Date

ATTACHMENT

JEFFERSON SMURFIT CORPORATION
D-GRAPHICS DIVISION

OCT 9 1995

Bureau of
Air Regulation

October 3, 1995

3389 POWERS AVENUE
JACKSONVILLE, FL 32207
TELEPHONE: 904/733-4020
FAX: 904/733-4381

C. H. Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Building
Tallahassee, Florida 32399-2400

RE: Request to amend the construction permit # AC 16-261912 to lower the individual presses V.O.C. lbs/hour application rates.

Dear Mr. Fancy:

The purpose of this letter is to request an amendment to D-Graphics construction permit # AC 16-261912 to lower the restriction on the individual V.O.C. lbs/hr application rate on Press #4 from 350 lbs/hr to 287.5 lbs/hr (specific condition #12) and on Press #5 from 450 lbs/hr to 287.5 lbs/hr (specific condition #13). We request this amendment in order to balance the individual press loading requirements with the combined presses loading requirement of 575 lbs/hr. Our purpose in this is to make our reporting requirements less burdensome on our daily operations.

With this amendment to the construction permit there will be no increase in the hourly or yearly emissions from either press or the facility, but instead a reduction in the individual hourly rates. In addition, this amendment will not require any change of equipment, nor expenditures of any money.

By balancing the individual loading requirements of each press with the 575 lbs/hr that both presses combined are limited to, we hope to make the reporting requirements less complex. In particular, we request a change in the requirements that the daily hours of operation (specific condition = 10) and the daily V.O.C. application rates (specific condition = 18) be recorded separately when each press is running individually versus when they run concurrently. It would be less burdensome on D-Graphic's operations if each press is just tracked individually for daily hours of operations and V.O.C. application rates. In addition, by changing the maximum operating condition of each press individually to be equivalent to each press operating concurrently, we request that you eliminate the need to test each press individually as well as concurrently (specific condition #17).

As the current permit reads, D-Graphics would find it infeasible and extremely burdensome to record these measures in different categories depending on the operational status of each press. We

C. H. Fancy, P.E.


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believe that this amendment would potentially update specific conditions 10, 12, 13, 17, and 18.

We are close to having the Total Enclosure functional. Within 4 weeks we hope to start the debugging of all systems. It is our goal to perform a compliance test prior to December 1.

If there are any questions or issues that need to be clarified, please feel free to contact me at any time. I appreciate your effort and look forward to working with the department regarding these issues.

Very truly yours,



Douglas V. Turner
Plant Manager

cc: Mike Harley, P.E., DEP
Richard L. Robinson, P.E., R&ESD
Wayne E. Tutt, R&ESD
Wayne Gilsdorf, Jefferson Smurfit
Bob Dinehart, Jefferson Smurfit