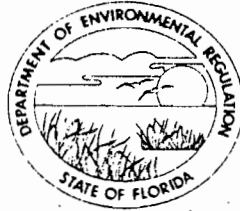


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

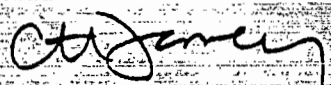
Mr. Robert J. Stearley
Vice President, Consumer Packaging Division
Jefferson Smurfit Corporation
Post Office Box 2710-F
Jacksonville, Florida 32231-0002

November 1, 1985

Enclosed is Permit Number AC 16-105518 to Austill Packaging, Jefferson Smurfit Corporation which authorizes the construction of a catalytic incinerator with associated capture and transport systems for packaging rotogravure press No. 2 at the company's existing facility in Jacksonville, Duval 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: Lloyd Stebbins, P.E.
Johnny Cole
Jerry Woosley
Bill Voshell

CERTIFICATION

This is to certify that the foregoing Notice of Permit and all copies requested were mailed before the close of business on November 4, 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
Clerk

Nov. 4, 1985
Date

Final Determination

Austill Packaging
Jefferson Smurfit Corporation
Duval County
Jacksonville, Florida

Catalytic Incinerator with Associated Capture and Transport
Systems for Packaging Rotogravure Press 2

Permit Number:
AC 16-105518

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

October 24, 1985

Final Determination

Austill Packaging's application for a permit to construct a catalytic incinerator with associated capture and transport systems for packaging rotogravure press number 2 at their plant in Jacksonville, Duval 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 Florida Times Union on September 16, 1985.

Copies of the preliminary determination have been available for public inspection at the Northeast District office in Jacksonville, the Duval County Bio-Environmental Services Division (BESD) office in Jacksonville, and the Bureau of Air Quality Management offices in Tallahassee.

Comments on the proposed construction permit were received from J. E. Woosley of BESD. The comments have been reviewed and the following action shall be taken:

1. Mr. Woosley requests that Specific Condition 8 be expanded to require that the test report be submitted to the appropriate agencies within 45 days of the test date. In order to clarify the intent of Specific Condition 8, the condition will be changed to reflect the requirements of the Consent Final Judgement dated February 28, 1985.
2. Mr. Woosley requests that the emission summary in the preliminary determination be expanded in order to avoid confusion. The following will be inserted in Section III of the preliminary determination:

Emission

Average Actual Uncontrolled
156.3 lbs/hr and 186.7 T/yr

Potential Uncontrolled
540 lbs/hr and 1775.25 T/yr

Maximum Allowable
129.6 lbs/hr and 426.06 T/yr

This addition to the preliminary determination will not require any changes to the permit specific conditions.

The final action of the department will be to issue the permit to construct with the changes discussed above.



DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division
Air and Water Pollution Control

September 25, 1985

Mr. Bill Thomas, P.E.
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blairstone Road
Tallahassee, FL 32301

Re: Austill Packaging Press No. 2

Dear Mr. Thomas:

Bio-Environmental Services Division (BESD) offers the following comments concerning the proposed permit for the captioned source:

DER
SEP 30 1985
BAQM

- (1) Specific Condition No. 8 should be changed to read: Final compliance testing shall be performed on or before December 31, 1985. Copies of the test report shall be submitted to the DER NE District Office, BESD, and EPA, Region IV, within 45 days of the test date.
- (2) Technical Evaluation and Preliminary Determination III
Summary of Emissions and Air Quality Analysis
Average potential emissions without controls are given as 156.3 lbs/hr and 186.7 T/yr.

To avoid confusion it is suggested the following language be inserted:

| | |
|------------------------------|--|
| <u>Emissions</u> | |
| Average Actual Uncontrolled | |
| 156.3 lbs/hr and 186.7 T/yr | |
| | |
| Potential Uncontrolled | |
| 540 lbs/hr and 1775.25 T/yr | |
| | |
| Maximum Allowable | |
| 129.6 lbs/hr and 426.06 T/yr | |

Your consideration of the above is appreciated. If BESD may be of further assistance, please advise.

Very truly yours,

Jerry E. Woosley
Associate Engineer

cc: Mr. Ernest Frey, District Manger
BESD File 1120 D

JEW/bgm



Best Available Copy

The Florida Times-Union



Jacksonville Journal

FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared George A. Dan

who on oath says that he is Retail Advertising Manager of The Florida Times-Union, and

Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,

Florida; that the attached copy of advertisement, being a

Legal Notice

in the matter of Austill Packaging

in the Court,

was published in The Florida Times Union

in the issues of September 16

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval 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 said newspaper.

Sworn to and subscribed before me this 16th day of

September, A.D. 19 85

Oliver B. ... Notary Public, State of Florida at Large.

Handwritten signature of George A. Dan

My Commission Expires

NOTARY PUBLIC, STATE OF FLORIDA commission expires Feb. 19, 1989

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 Austill Packaging, Jefferson Smurfit Corporation to construct a catalytic incinerator with associated capture and transport systems for packaging rotogravure press 2 located at the applicant's existing facility in Jacksonville, Duval 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 17-10, 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 to 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 Duval County Dept. of Health, Welfare and Bio-Environmental Service 515 West 6th Street Jacksonville, Florida 32206 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.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSHINKEL
SECRETARY

PERMITTEE:

Austill Packaging
Jefferson Smurfit Corporation
3389 Powers Avenue
Jacksonville, Florida 32231

Permit Number: AC16-105518

Expiration Date: March 31, 1986

County: Duval

Latitude/Longitude: 30° 15' 55" N/
81° 37' 18" W

Project: Press #2 Catalytic Incinerator
with associated capture and
transport system

This permit is issued under the provisions of Chapter(s) 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 show on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the construction/installation of a catalytic incinerator with an associated capture and transport system to be retrofitted to the new rotogravure printing press designated Press #5. The overall capture and transport system efficiency and the destruction efficiency of the add-on control system was established in a LAER determination, pursuant to FAC Rule 17-2.510(4).

The construction/installation shall be in accordance with the permit application and plans, documents, amendments, and drawings, except as otherwise noted on pages 5 and 6 of the "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202 (1).
2. C.H. Fancy's letter dated June 25, 1985.
3. R.J. Stearley's letter dated July 16, 1985.

PERMITTEE:
Austill Packaging

Permit Number: AC16-105518
Expiration Date: March 31, 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:
Austill Packaging

Permit Number: AC16-105518
Expiration Date: March 31, 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:
Austill Packaging

Permit Number: AC16-105518
Expiration Date: March 31, 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.
- () Determination of Lowest Achievable Emission Rate (LAER)

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:
Austill Packaging

Permit Number: AC16-105518
Expiration Date: March 31, 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. The hours of operation for the press shall not exceed 6,575 hours per year run time.
2. The maximum volatile organic compounds applied to the substrate shall not exceed 540 pounds per hour.
3. The source is subject to the emission standards established through a determination of LAER by a Consent Judgement, which requires 80% overall capture and transport efficiency of the VOC delivered to the substrate and 95% total destruction of all VOC delivered to the inlet of the catalytic incinerator.

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PERMITTEE:
Austill Packaging

Permit Number: AC16-105518
Expiration Date: March 31, 1986

SPECIFIC CONDITIONS:

4. Capture efficiency shall be demonstrated using the procedures specified in the July 7, 1980 EPA memorandum entitled "Determination of Capture Efficiency", from James Berry to Doug Cook.
5. Destruction efficiency of the catalytic incinerator shall be demonstrated by determining the inlet and outlet VOC concentrations using EPA Method 25. Dividing the outlet concentration by the inlet concentration will provide the penetration. Destruction Efficiency = $1 - \text{Penetration}$.
6. Compliance test shall be performed at maximum operating conditions for single press and multiple press operations. 95% total destruction of all VOC delivered to the inlet of the catalytic incinerator shall be demonstrated by these compliance tests.
7. The Department, BES, and EPA shall be notified, in writing, 15 days in advance of the EPA Method 25 compliance test.
8. Test reports demonstrating compliance shall be submitted by December 31, 1985, as required by the Consent Final Judgement dated February 28, 1985.
9. The use of all coatings and solvents shall be recorded daily and shall be submitted quarterly to DER's Northeast District office and Jacksonville's BES office.
10. Prior to 90 days before the expiration of this permit, a complete application for an operating permit shall be submitted to DER's Northeast District office and Jacksonville's BES office. The permittee may continue to operate in compliance with all terms of this construction permit until its expiration date or the issuance of an operating permit.

Issued this 29 day of October,
1985.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.