

JEFFERSON SMURFIT CORPORATION D-GRAPHICS DIVISION

VIA FACSIMILE (1 page)

December RECEIVE DE

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Mr. Charles Logan
Bureau of Air Regulations
Division of Air Resources
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399

DEC 8 1994

Bureau of Regulation

Re: Temperature Rise Across D-Graphics Catalytic Oxidizer

Dear Charlie:

In our meeting on Monday, Dec. 6th; as a group, we discussed the possibility of determining lbs./hr. VOC's applied based on the resulting temperature rise across the oxidizer. Bruce Mitchell asked that we develop a curve predicting the relationship between lbs. VOC's applied and temperature rise.

As we discussed on the telephone yesterday, once we start up on 100% capture we can directly equate 1bs. VOC's to temperature rise. Their is also a second direct relationship; the average heat value of the material we are applying to the web. We run about 30 different of solvents and inks combinations that result in significant temperature changes. Other formulation changes are very minor. Additionally, changing ambient condition impact the amount of solvent used on the press. In our present pressroom, without air conditioning, formulation changes between afternoon and late night are typical.

Because of the variation we now experience, we cannot accurately predict temperature rise. I propose that you not address the temperature rise issue in the construction permit you are about to issue. We will continue to investigate the applicability of relating temperature rise to lbs. VOC's applied because we would like to generate an alternative to weighing all increments of material used on the press.

If you have any questions on this subject, please call me here at D-Graphics, (904) 733-4020.

Sincerely,

Robert A. Simbort

Robert A. Dinehart Division Engineer Consumer Packaging Division Jefferson Smurfit Corporation