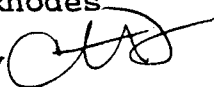


Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes
FROM: Clair Fancy 
DATE: December 5, 1994
SUBJECT: Approval of Construction Permit
AC 16-259725
D-Graphics

Attached for your approval and signature is a construction permit, No. AC 16-259725, for a modification to allow an increase in VOC emissions of 39.9 TPY. The proposed permit was prepared by the Bureau of Air Regulation. The facility is a source of VOC emissions and does rotogravure type printing. The existing facility is located in Jacksonville, Duval County, Florida.

I recommend your approval and signature.

HLR/BM/rbm

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DEP File No. AC 16-259725
Duval County

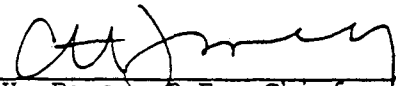
D-Graphics, Inc.
3389 Powers Avenue
Jacksonville, Florida 32231

Enclosed is Construction Permit Number AC 16-259725 for the modification of the existing facility to allow the permittee an increase in VOC emissions of 39.9 TPY. The facility is located at 3389 Powers Avenue, Jacksonville, Duval County, Florida 32231. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this Order (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 32399-2400; 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 Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

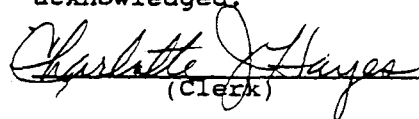

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 12/16/94 to the listed persons.

Clerk Stamp

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


(Clerk)

12/15/94
(Date)

Copies furnished to:

S. Pace, DCR&ESD
C. Kirts, NED
J. Harper, EPA
J. Bunyak, NPS
J. Manning, P.E.
J. Braswell, Esq., DED
T. Cole, Esq., OHF&C

Final Determination

D-Graphics
Duval County, Florida

Department Construction Permit No.:
AC 16-259725

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

December 5, 1994

Final Determination

D-Graphics

AC 16-259725

The construction permit application package and supplementary material were reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Florida Times Union on November 16, 1994. The Technical Evaluation and Preliminary Determination was distributed on November 15, 1994, and available for public inspection at the Department's Northeast District office, the Department's Bureau of Air Regulation office, and the Duval County's Resources and Environmental Services Division office.

During the public notice period, a meeting was held on November 22, 1994, to discuss comments from the applicant's representatives regarding the Department's Intent to Issue package, which includes the proposed construction permit. The comments and the Department's response (R) will follow. Any change made will be in bold type:

Construction Permit: Specific Conditions

#8. There was a question regarding the need to send EPA a notification of any compliance test; and, requested a change from EPA Method 25 to 25A.

R: The Department does not see the need to notify EPA regarding any compliance test; and, agrees to change the test method citing. Therefore, the following will be changed:

FROM: The Department, R&ESD of Duval County, and EPA shall be notified, in writing, at least 15 days in advance of any EPA Method 25 compliance test.

TO: The Department and R&ESD of Duval County shall be notified, in writing, at least 15 days in advance of any EPA Method 25A compliance test.

#9. A request was made to change the VOC emissions accounting time-frame from the "24-hour basis" to "daily basis (6:00 a.m. to 6:00 a.m.)".

R: The request is acceptable and the following will be changed:

FROM: The use of all coatings and solvents shall be recorded daily. Accounting of VOC emissions (42.9 lbs/hr or less) shall be verifiable on a 24-hour basis and shall be reported on a monthly basis in a quarterly report. This shall be done by documenting, through measurements and records, that the VOCs

applied to the substrate do not exceed 178.6 lbs/hr and maintaining records to demonstrate that the VOC capture/transport and destruction system is maintained and operated properly. The report shall be provided to the Duval County's R&ESD. The quarterly reports shall be submitted by the 15th day after the end of the quarter (January-March, April-June, July-September, and October-December).

TO: The use of all coatings and solvents shall be recorded daily. Accounting of VOC emissions (42.9 lbs/hr or less) shall be verifiable on a daily basis (6:00 a.m. to 6:00 a.m.) and shall be reported on a monthly basis in a quarterly report. This shall be done by documenting, through measurements and records, that the VOCs applied to the substrate do not exceed 178.6 lbs/hr and maintaining records to demonstrate that the VOC capture/transport and destruction system is maintained and operated properly. The report shall be provided to the Duval County's R&ESD. The quarterly reports shall be submitted by the 15th day after the end of the quarter (January-March, April-June, July-September, and October-December).

11. The request was to include the citing of the rule for the definition of modification from Chapter 62-213, F.A.C.

R: The request is acceptable and the following will be changed:

FROM: The permittee shall, concurrent with any future modification (physical change in operation or method of operation at the facility that results in any increase in emissions of any air pollutant) or for any increase in printing capability, configure the existing Press No. 5 and any other presses being installed to ensure 100% capture (i.e., Permanent Total Enclosure that meets the requirements of Procedure T as defined in Rule 62-297.440(7)(f), F.A.C.) of all VOC emissions. No operation of the modified system shall be allowed in the new configuration without total enclosure as described above.

TO: The permittee shall, concurrent with any future modification pursuant to Rule 62-212.200, F.A.C., Definitions - Modification (physical change in operation or method of operation at the facility that results in any increase in emissions of any air pollutant) or for any increase in printing capability, configure the existing Press No. 5 and any other presses being installed to ensure 100% capture (i.e., Permanent Total Enclosure that meets the requirements of Procedure T as defined in Rule 62-297.440(7)(f), F.A.C.) of all VOC emissions. No operation of the modified system shall be allowed in the new configuration without total enclosure as described above.

14. The request was to change the next required compliance test from "not later than December 31, 1994" to "not later than February 28, 1995" and to replace "beginning with the date of the initial (late 1994) compliance test." with "thereafter, while still in the current configuration."

R: The requests are acceptable and the following will be changed:

FROM: The permittee shall conduct a compliance stack test utilizing the capture method described in permit Specific Condition No. 5 and EPA Method 25A, as described in 40 CFR 60, Appendix A, not later than December 31, 1994, and no less frequently than every six months beginning with the date of the initial (late 1994) compliance test.

TO: The permittee shall conduct a compliance stack test utilizing the capture method described in permit Specific Condition No. 5 and EPA Method 25A, as described in 40 CFR 60, Appendix A, not later than February 28, 1995, and no less frequently than every six months thereafter, while still in the current configuration.

16. The request was to add and insert the words "setup and" between the words "for" and "operating the press." for clarification purposes.

R. The request is acceptable and the following will be changed:

FROM: Operation of Press No. 5, prior to total enclosure, shall occur only with the curtains down and closed, except for parting of the curtains to enter and exit the press area as needed for operating the press.

TO: Operation of Press No. 5, prior to total enclosure, shall occur only with the curtains down and closed, except for parting of the curtains to enter and exit the press area as needed for **setup and** operating the press.

Attachments to be incorporated: AC 16-259725

- o Technical Evaluation and Preliminary Determination dated November 15, 1994.
- o Proof of Publication of the Department's Intent to Issue in The Florida Times Union issue of November 16, 1994.
- o Final Determination dated December 5, 1994.

Based on the changes requested in the meeting and the concurrence of the changes by all participating parties (DARM, NED, and R&ESD), it is recommended that the construction permit, No. AC 16-259725, be issued as drafted, with the above changes and the referenced attachments incorporated.



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:
D-Graphics
3389 Powers Avenue
Jacksonville, Florida 32231

Permit Number: AC 16-259725
Expiration Date: May 15, 1995
County: Duval
Latitude/Longitude: 30°15'55"N
81°37'18"W

Project: Rotogravure Printing Press
No. 5 Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.); Chapters 62-210, 212, 272, 296 and 297, Florida Administrative Code (F.A.C.); and, Chapter 62-4, F.A.C. The above named permittee is hereby authorized to perform the work or operate the emission unit shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department of Environmental Protection (Department) and specifically described as follows:

This is for the modification of the existing facility to allow the permittee to operate the rotogravure printing press No. 5 an additional 1863 hours for a total of 6088 hours per calendar year. The maximum allowable volatile organic compound (VOC) emissions and volatile organic compounds applied to the substrate shall not exceed 130.5 (90.6 + 39.9) tons per calendar year and 178.6 pounds per hour, respectively. The overall capture efficiency, transport system efficiency and destruction efficiency of the emission control system was established in a LAER determination signed February 18, 1985, pursuant to Rule 62-212.500(4), F.A.C.

The emission unit shall be constructed/modified in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Modify an Air Pollution Source received on October 26, 1994.
2. Mr. Lloyd H. Stebbins's letter with Attachment received June 1, 1987.
3. Mr. Dale Twachtmann's letter dated June 8, 1987.
4. Mr. C. H. Fancy's letter dated November 7, 1994.
5. Mr. Douglas Turner's letter with enclosures received November 8, 1994.
6. Technical Evaluation and Preliminary Determination dated November 15, 1994.
7. Proof of Publication of the Department's Intent to Issue in The Florida Times Union issue of November 16, 1994.
8. Final Determination dated December 5, 1994.

PERMITTEE:
D-Graphics

Permit Number: AC 16-259725
Expiration Date: May 15, 1995

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither 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 is not 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall 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

PERMITTEE:
D-Graphics

Permit Number: AC 16-259725
Expiration Date: May 15, 1995

GENERAL CONDITIONS:

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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

a. Have access to and copy any records that must be kept under the conditions of the permit;

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,

c. Sample or monitor 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 provide the Department with the following information:

a. a description of and cause of non-compliance; and,

b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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 for 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 involving the permitted source

PERMITTEE:
D-Graphics

Permit Number: AC 16-259725
Expiration Date: May 15, 1995

GENERAL CONDITIONS:

arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, F.A.C., 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 or a copy thereof shall be kept at the work site of the permitted activity.

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 (NSPS)
- (X) Determination of Lowest Achievable Emission Rate (LAER)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application

PERMITTEE:
D-Graphics

Permit Number: AC 16-259725
Expiration Date: May 15, 1995

GENERAL CONDITIONS:

for this permit. These materials shall be retained 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 dates 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 corrected promptly.

SPECIFIC CONDITIONS:

1. This permit supersedes construction permit No. AC 16-089528.
2. The hours of operation for Press No. 5 shall not exceed 6088 hours per calendar year (January 1 through December 31) of run time.
3. The maximum allowable volatile organic compounds (VOC) applied to the substrate shall not exceed 178.6 pounds per hour and the maximum allowable VOC emissions shall not exceed 130.5 tons per calendar year.
4. The source is subject to the emission standards established through a LAER determination signed February 18, 1985, 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. The total allowable VOC emissions for the Press No. 5 shall not exceed 130.5 tons per calendar year.

PERMITTEE:
D-Graphics

Permit Number: AC 16-259725
Expiration Date: May 15, 1995

SPECIFIC CONDITIONS:

5. Capture efficiency shall be demonstrated using the procedures specified in Rule 62-297.450, F.A.C. A pre-compliance test meeting shall be scheduled with Duval County Regulatory and Environmental Services Department (R&ESD) at least 15 days prior to the compliance test to ensure that proper testing procedures will be followed.

6. Destruction efficiency of the catalytic incinerator shall be demonstrated by determining the inlet and outlet VOC concentrations using EPA Method 25A. Dividing the outlet concentration by the inlet concentration will provide the penetration. Destruction Efficiency = $1 - \text{Penetration}$.

7. Compliance tests shall be performed at maximum operating conditions for single press and multiple press operations. A 95% total destruction of all VOC delivered to the inlet of the catalytic incinerator shall be demonstrated by these compliance tests.

8. The Department and R&ESD of Duval County shall be notified, in writing, at least 15 days in advance of any EPA Method 25A compliance test.

9. The use of all coatings and solvents shall be recorded daily. Accounting of VOC emissions (42.9 lbs/hr or less) shall be verifiable on a daily basis (6:00 a.m. to 6:00 a.m.) and shall be reported on a monthly basis in a quarterly report. This shall be done by documenting, through measurements and records, that the VOCs applied to the substrate do not exceed 178.6 lbs/hr and maintaining records to demonstrate that the VOC capture/transport and destruction system is maintained and operated properly. The report shall be provided to the Duval County's R&ESD. The quarterly reports shall be submitted by the 15th day after the end of the quarter (January-March, April-June, July-September, and October-December).

10. The permittee shall, within 10 days of issuance of this permit, surrender the air construction permits, AC 16-105518 for Press No. 2 and AC 16-093347 for Press No. 4, to the Department's Northeast District office.

11. The permittee shall, concurrent with any future modification pursuant to Rule 62-212.200, F.A.C., Definitions - Modification (physical change in operation or method of operation at the facility that results in any increase in emissions of any air pollutant) or for any increase in printing capability, configure the existing Press No. 5 and any other presses being installed to ensure 100% capture (i.e., Permanent Total Enclosure that meets the

PERMITTEE:
D-Graphics

Permit Number: AC 16-259725
Expiration Date: May 15, 1995

SPECIFIC CONDITIONS:

requirements of Procedure T as defined in Rule 62-297.440(7)(f), F.A.C.) of all VOC emissions. No operation of the modified system shall be allowed in the new configuration without total enclosure as described above.

12. In the event that no further modifications are made to the facility, the permittee shall take action to effect Permanent Total Enclosure that meets the requirements of Procedure T as defined in Rule 62-297.440(7)(f), F.A.C., not later than June 30, 1996.

13. Any changes effected under Specific Conditions 11 and 12, above, shall be done through a timely application for an air construction permit modification. Action by the Department shall reflect appropriate changes in the hourly and annual VOC emission rates and shall incorporate a minimum of 95 percent VOC destruction capability.

14. The permittee shall conduct a compliance stack test utilizing the capture method described in permit Specific Condition No. 5 and EPA Method 25A, as described in 40 CFR 60, Appendix A, not later than February 28, 1995, and no less frequently than every six months thereafter, while still in the current configuration.

15. Testing of emissions shall be conducted with the emission unit (Press No. 5) operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than 90 percent of the maximum operating rate allowed by the permit. In this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.

16. Operation of Press No. 5, prior to total enclosure, shall occur only with the curtains down and closed, except for parting of the curtains to enter and exit the press area as needed for setup and operating the press.

17. The stack testing facilities shall be provided by the permittee pursuant to Rule 62-297.345, F.A.C.

PERMITTEE:
D-Graphics

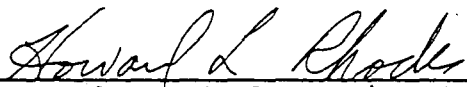
Permit Number: AC 16-259725
Expiration Date: May 15, 1995

SPECIFIC CONDITIONS:

18. This permit expires on May 15, 1995. The permittee shall submit a complete application for an operation permit to R&ESD of Duval County no later than February 15, 1995.

Issued this 5 day
of December, 1994

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Howard L. Rhodes, Director
Division of Air Resources
Management