



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

December 27, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Turner:

Attached is one copy of the Department's Intent to Issue a construction permit for the construction/installation of the No. 4 press adjacent to the existing No. 5 press and to construct a total enclosure system (TES) around both presses. The No. 5 press will be operated until the TES is operational and in compliance, at which time both presses may be operated concurrently and the total annual allowable VOC emission limit will be reduced from 130.5 TPY to 95.0 TPY, a reduction of 35.5 TPY. The construction/installation will occur at the existing facility located in Duval County.

Please submit any comments that you wish to have considered concerning the Department's proposed action to me.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/BM/rbm

Attachments

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

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

In the Matter of an  
Application for Permit by:

Mr. Douglas V. Turner  
D-Graphics  
3389 Powers Avenue  
Jacksonville, Tampa, Florida 32231

---

DEP File No. AC 16-261912  
Duval County

INTENT TO ISSUE

The Department of Environmental Protection (Department) hereby gives notice of its intent to issue an air construction permit (copy attached). The Department is issuing this Intent to Issue for the reasons stated below.

The applicant, D-Graphics, requested an air construction permit on December 6, 1994, to construct/install the No. 4 press adjacent to the existing No. 5 press and construct one total enclosure system (TES) around both presses. The TES will be required to capture/transport 100% of the total volatile organic compound (VOC) emissions from within the enclosure to an existing catalytic oxidizer system. The catalytic oxidizer system will have a minimum destruction efficiency of 95%. Once the applicant has successfully demonstrated that the TES meets the requirements given in Procedure T for a Permanent Total Enclosure during any initial and subsequent control device efficiency tests, the TES will be operational and both presses may be operated concurrently at the facility. Until the TES is operational and in compliance, then only the No. 5 press will be allowed to operate and the total maximum allowable VOC emissions limit for the facility is 130.5 tons per year (TPY; AC16-259725). When the TES is operational and in compliance, the maximum total VOC emissions for the facility will be decreased from 130.5 TPY to 95.0 TPY (28.8 lbs/hr). The maximum facility's allowable VOC emissions limit of 95.0 TPY (28.8

lbs/hr) is for both presses operating concurrently. The maximum allowable VOC emissions limit for the No. 4 press and the No. 5 press, when only one of the presses is being operated at the facility, is 17.5 lbs/hr and 22.5 lbs/hr, respectively. The maximum allowable hours of operation will be increased from 6088 to 6600 hours per year. The facility's limit is for a calendar year (January 1 through December 31).

The Department has permitting jurisdiction under Chapter 403, Florida Statutes (F.S.), and Chapters 62-210 through 62-296 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that the issuance of an air construction permit is necessary for the construction/installation of the No. 4 press, which is a modification to the existing facility.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue a Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be the one with significant circulation in the area that may be affected by the permitting action. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the proposed permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

Any 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, F.S. 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 permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. 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, F.S..

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; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action 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 notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 publication of this notice in the Office in 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. 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.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

---

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

Copies furnished to:

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on \_\_\_\_\_.

FILING AND ACKNOWLEDGMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is  
hereby acknowledged.

---

Clerk

---

Date

State of Florida  
Department of Environmental Protection  
Notice of Intent to Issue

AC 16-261912

The Department of Environmental Protection (Department) hereby gives notice of its intent to issue an air construction permit to D-Graphics, 3389 Powers Avenue, Jacksonville, Duval County, Florida 32231, to construct/install the No. 4 press adjacent to the existing press No. 5 and construct one total enclosure system (TES) around both presses. The maximum allowable emissions of volatile organic compounds (VOC) emissions for the No. 5 press is 130.5 tons per year (TPY) until the TES is operational, at which time the maximum total allowable VOC emissions from the facility will be 95.0 TPY when the No. 4 press and the No. 5 press are operated concurrently. The facility's limit is for a calendar year (January 1 through December 31). Until the TES is operational and in compliance, the No. 5 press is subject to the requirements and conditions of the February 18, 1995 determination of Lowest Achievable Emission Rate (LAER; minimum capture/transport efficiency of 80% and minimum destruction efficiency of 95%). After the TES is operational and in compliance, then the minimum capture/transport efficiency shall be 100% and the minimum destruction efficiency will be 95% (Consent Order of November 14, 1994, and AC16-259725 signed December 5, 1994, and clerked on December 6, 1994).

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 (F.S). 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, within fourteen (14) days of publication of this notice. 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, F.S.

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; and,

(g) A statement of the relief sought by petitioner, stating precisely the action 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 Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 publication of this notice 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. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation  
Bureau of Air Regulation  
111 South Magnolia Park Courtyard  
Tallahassee, Florida 32301

Department of Environmental Regulation  
Northeast District  
7825 Baymeadows Way  
Jacksonville, Florida 32256-4300

Duval County Regulatory & Environmental  
Services Division  
421 West Church Street, Suite 412  
Jacksonville, Florida 32202-4111

Any person may send written comments on the proposed action to Mr. C. H. Fancy at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation  
and  
Preliminary Determination

D-Graphics  
Duval County  
Jacksonville, Florida

Presses No. 4 & No. 5  
Department Permit Number: AC 16-261912

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

December 27, 1994



I. Application

A. Applicant

D-Graphics  
3389 Powers Avenue  
Jacksonville, Florida 32231

B. Project/Location/Classification

The Department received a complete application on December 6, 1994, to obtain an air construction permit for new construction at the existing facility in Jacksonville, Duval County, Florida. The facility's SIC Code is 2754: Gravure Commercial Printing. UTM coordinates of the existing facility are Zone 17, 440.2 km East and 3348.2 km North.

II. Project Description

D-Graphics requested a construction permit to install the No. 4 press adjacent to the existing No. 5 press and to construct a total enclosure system (TES) around both presses. The TES will be required to capture 100% of the total volatile organic compound (VOC) emissions from within the enclosure and evacuate these emissions to a catalytic oxidizing system. The catalytic oxidizing system shall have a minimum destruction efficiency of 95%. Once the applicant has successfully demonstrated that the TES meets the requirements given in Procedure T for a Permanent Total Enclosure pursuant to Rule 62-297.450, Florida Administrative Code (F.A.C.), during the initial and subsequent control device efficiency tests, both presses may be operated concurrently. Until the TES is operational and in compliance, then only the No. 5 press will be allowed to operate. The No. 5 press is allowed to operate 6088 hours per year and the maximum allowable VOC emissions are 130.5 tons per year (TPY; see AC16-259725). Upon demonstration that the TES is operating in compliance, the maximum total allowable VOC emissions from the facility will be decreased from 130.5 TPY to 95.0 TPY. The maximum total allowable VOC emission limit of 95.0 TPY (28.8 lbs/hr) is for both presses operating concurrently. The total allowable VOC emissions limit from the No. 4 press and the No. 5 press, when only one of the presses is being operated at the facility, is 17.5 lbs/hr and 22.5 lbs/hr, respectively. Also, the maximum facility's hours of operation will be increased from 6088 to 6600 hours per year after the TES is operational. The minimum capture/transport and destruction efficiencies have been established by a Consent Order and a determination of Lowest Achievable Emission Rate (LAER), respectively.

### III. Emissions

The existing facility's maximum allowable VOC emissions are 130.5 TPY for the No. 5 press, which are based on a minimum capture/transport efficiency of 80% and minimum destruction efficiency of 95%. Once the TES is demonstrated to be operational, the facility's maximum allowable VOC emissions will be decreased by 35.5 TPY to 95.0 TPY (28.8 lbs/hr), which are based on a minimum capture/transport efficiency of 100% and a minimum destruction efficiency of 95%. The maximum allowable VOC emissions limit for the No. 4 press and the No. 5 press, when only one of the presses is operating at the facility, is 17.5 lbs/hr and 22.5 lbs/hr, respectively. The facility's limitation (TPY) is for a calendar year (January 1 through December 31).

### IV. Rule Applicability

The proposed project is subject to preconstruction review in accordance with Chapter 403, Florida Statutes, and Chapters 62-210 through 297 and 62-4, F.A.C. The proposed project will occur in an area classified as transitional nonattainment for ozone, unclassifiable for PM<sub>10</sub> (particulate matter with an aerodynamic diameter of 10 microns or less) and sulfur dioxide, and in the area of influence of the air quality maintenance area for PM.

The proposed construction/modification is subject to the emissions review requirements pursuant to Rule 62-212.300, F.A.C., Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements. The construction/modification at the facility is subject to the February 15, 1985 LAER determination requirements and conditions for the No. 5 press prior to construction of the TES. Subsequent to the TES being operational and in compliance, the facility's control strategy shall be in accordance with the Consent Order of November 14, 1994, and construction permit No. AC16-259725 (signed December 5, 1995, and clerked December 6, 1994), which require the TEC to have a minimum VOC emissions capture/transport system efficiency of 100% and a minimum VOC emissions destruction efficiency of 95%.

The VOC emissions collection/transport and destruction efficiencies shall be demonstrated in accordance with Rule 62-297.450, F.A.C., and shall be conducted twice every fiscal year (October 1 through September 30). Accounting of VOC emissions shall be verifiable on a 24-hour basis (6:00 a.m. to 6:00 a.m.) and shall be reported on a monthly basis in a quarterly report. The report shall be provided to the Duval County's Regulatory and Environmental Services Division. The quarterly reports shall be submitted by the 15th day of the following month after the end of the each quarter (January-March, April-June, July-September, and October-December).

#### V. Air Quality Impact Analysis

Based on the VOC emissions reduction of 35.5 TPY, after the TES is in compliance and operational, the Department has reasonable assurance that the proposed project, as described in the report and subject to the conditions of approval proposed herein, will not cause or contribute to a violation of any AAQS or PSD increment.

#### VI. Conclusion

Based on the information provided by D-Graphics, the Department has "reasonable assurance" that the proposed construction/modification at the facility, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapters 62-210 through 297 and 62-4 of the Florida Administrative Code.

#### V. Air Quality Impact Analysis

Based on the VOC emissions reduction of 35.5 TPY, after the TES is in compliance and operational, the Department has reasonable assurance that the proposed project, as described in the report and subject to the conditions of approval proposed herein, will not cause or contribute to a violation of any AAQS or PSD increment.

#### VI. Conclusion

Based on the information provided by D-Graphics, the Department has "reasonable assurance" that the proposed construction/modification at the facility, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapters 62-210 through 297 and 62-4 of the Florida Administrative Code.



# 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 16-261912**  
**Expiration Date: January 1, 1997**  
**County: Duval**  
**Latitude/Longitude: 30°15'55"N**  
**81°37'18"W**

**Project: Rotogravure Printing**  
**Presses No. 4 & No. 5**  
**Construction/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 construction/installation of the No. 4 press adjacent to the existing No. 5 press and construct a total enclosure system (TES) around both presses. The TES will be required to capture/transport 100% of the total volatile organic compounds (VOC) emissions from within the enclosure to a catalytic oxidizing system. The catalytic oxidizing system will be required to have a minimum destruction efficiency of 95%. Once the permittee has successfully demonstrated that the TES meets the requirements given in Procedure T for a Permanent Total Enclosure pursuant to Rule 62-297.450, F.A.C., during the initial and subsequent control device efficiency tests, the TES will be considered operational and both presses may be operated concurrently. Until the TES is operational and in compliance, then only the No. 5 press will be allowed to operate. The No. 5 press is permitted for 6088 hours of operation and the maximum allowable VOC emissions are 130.5 tons per year (TPY), which reflects a maximum of 178.6 pounds per hour (lbs/hr) of VOC applied to the substrate. When the TES is operational and in compliance, the maximum total allowable VOC emissions from the facility will be 95.0 TPY, which reflects a maximum total VOC substrate loading of 575.0 lbs/hr while the No. 4 and No. 5 presses are operated concurrently. After the TES is operational and in compliance, the facility's allowable hours of operation will be increased from 6088 to 6600 hours per year. For the control system associated with the No. 5 press, the minimum VOC emissions capture/transport efficiency is 80% and the minimum VOC emissions destruction efficiency is 95%, which was established in a LAER determination signed February 18, 1985. After the TES is operational and in compliance, the minimum

**PERMITTEE:**  
**D-Graphics**

**Permit Number: AC 16-261912**  
**Expiration Date: January 1, 1997**

VOC emissions capture/transport efficiency will be 100% and the minimum VOC emissions destruction efficiency will be 95%, which is based on the Consent Order (Case No. 94-3395) signed November 14, 1994, and construction permit No. AC16-259725 signed December 5, 1994, and clerked December 6, 1994.

The emission units/sources 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. Consent Order (Case No. 94-3395) dated November 14, 1994.
2. Final Determination dated December 5, 1994.
3. Construction Permit No. AC16-259725 signed December 5, 1994, and clerked on December 6, 1994.
4. Application to Construct/Modify an Air Pollution Source received on December 6, 1994.
5. Mr. Douglas Turner's letter dated December 8, 1994.
6. Technical Evaluation and Preliminary Determination dated December 27, 1994.

**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

PERMITTEE:  
D-Graphics

Permit Number: AC 16-261912  
Expiration Date: January 1, 1997

**GENERAL CONDITIONS:**

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 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.

PERMITTEE:  
D-Graphics

Permit Number: AC 16-261912  
Expiration Date: January 1, 1997

**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 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 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



PERMITTEE:  
D-Graphics

Permit Number: AC 16-261912  
Expiration Date: January 1, 1997

**GENERAL CONDITIONS:**

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 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 16-259725.

Prior to a total enclosure system (TES) being operational and in compliance:

2. The TES will be considered operational when the applicant has constructed/installed the No. 4 press adjacent to the No. 5 press, has constructed a total enclosure system around both presses, and has successfully demonstrated that the TES meets the requirements given in Procedure T for a Permanent Total Enclosure pursuant to Rule 62-297.450, F.A.C., during any initial and subsequent control device efficiency tests.

3. Prior to the TES being operational, only the No. 5 press will be allowed to operate. The hours of operation for only the press No. 5 shall not exceed 6088 hours per calendar year (January 1 through December 31) of run time prior to the TES being operational.

PERMITTEE:  
D-Graphics

Permit Number: AC 16-261912  
Expiration Date: January 1, 1997

**SPECIFIC CONDITIONS:**

4. The maximum allowable volatile organic compounds (VOC) applied to the substrate shall not exceed 178.6 pounds per hour (lbs/hr) and the maximum allowable VOC emissions for the No. 5 press shall not exceed 42.9 lbs/hr and 130.5 tons per calendar year (TPY).

5. The No. 5 press is subject to the emission standards established through a LAER determination signed February 18, 1985, which requires a minimum 80% capture/transport efficiency of the VOC emissions delivered to the substrate and a minimum 95% destruction of all VOC emissions delivered to the inlet of the catalytic incinerator.

After the TES is operational and in compliance:

6. After the TES is operational and in compliance, the No. 4 press and the No. 5 press may be operated concurrently and the maximum allowable hours of operation for the presses, while operating concurrently or independently, shall not exceed 6600 hours per calendar year.

7. When both presses are being operated concurrently at the facility, the maximum allowable VOC 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.

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

9. 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.

10. The minimum capture/transport efficiency of the TES shall be 100%, which was established by Consent Order (Case No.: 94-335) on November 14, 1994, and will supersede the less stringent capture/transport efficiency established by LAER on February 18, 1985. The minimum destruction efficiency shall be 95%.

11. The capture/transport 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's 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.

12. The destruction efficiency of the catalytic incinerator shall be demonstrated by determining the inlet and outlet VOC concentrations using EPA Method 25A. Dividing the outlet

PERMITTEE:  
D-Graphics

Permit Number: AC 16-261912  
Expiration Date: January 1, 1997

**SPECIFIC CONDITIONS:**

concentration by the inlet concentration will provide the penetration. Destruction Efficiency = 1 - Penetration.

13. The compliance tests shall be performed at maximum operating conditions for a single press (No. 4 and No. 5 operating independent of the other) and multiple press operations (No. 4 and No. 5 operating concurrently), for a total of three separate compliance tests. A 95% total destruction of all VOC emissions delivered to the inlet of the catalytic incinerator shall be demonstrated by these compliance tests.

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

15. The use of all coatings and solvents shall be recorded on a 24-hour basis (6:00 a.m. to 6:00 a.m.). Accounting of VOC emissions (42.9 lbs/hr or less prior to the TES being operational and 28.8 lbs/hr or less thereafter) 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 VOC applied to the substrate do not exceed 178.6 lbs/hr prior to the TES being operational; the substrate loading values specified in Specific Conditions Nos. 7, 8 and 9, after the TES is operational; and, maintaining records to demonstrate that the VOC capture/transport and destruction system is maintained and operated properly. The reports shall be provided to the Duval County's R&ESD. The quarterly reports shall be submitted by the 15th day of the following month after the end of each quarter (January-March, April-June, July-September, and October-December).

16. The permittee shall, concurrent with any future modifications pursuant to Rule 62-212.200, F.A.C., Definitions - Modifications (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 (No. 4) 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.

17. 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.

PERMITTEE:  
D-Graphics

Permit Number: AC 16-261912  
Expiration Date: January 1, 1997

**SPECIFIC CONDITIONS:**

18. Any changes effected under Specific Conditions 16 and 17, 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.

19. 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.

20. Testing of emissions shall be conducted with the emission units/sources (the No. 4 and/or the No. 5 press) 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/source may be tested at less than 90 percent of the maximum operating rate allowed by the permit. In this case, subsequent emission unit/source 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.

21. 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.

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

23. Offsets for VOC emissions are as follows:

a. AC16-093347: 2.7 TPY (from old No. 4 press); permit surrendered to the Department on December 8, 1994; and,

b. AC16-261912: 63.2 TPY (No. 5 press), due to the difference of the overall capture/transport and destruction efficiencies from 76% to 95%; these offsets will be available only after the TES is operational and in compliance.

24. Pursuant to Rule 62-210.370(2), an Annual Operation Report is due by March 1 of each year. The report shall be submitted to Duval County's R&ESD office.

**PERMITTEE:**  
**D-Graphics**

**Permit Number: AC 16-261912**  
**Expiration Date: January 1, 1997**

**SPECIFIC CONDITIONS:**

25. Pursuant to Rule 62-4.090, F.A.C., the permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit.

26. Pursuant to Rules 62-4.055 and 62-4.220, F.A.C., an application for an operation permit must be submitted to the Duval County's R&ESD office no later than October 1, 1996, which is at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit.

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**

---

Howard L. Rhodes, Director  
Division of Air Resources  
Management