

BEST AVAILABLE COPY**JEFFERSON SMURFIT CORPORATION
D-Graphics Division**

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

January 6, 1995

Mr. Charles Logan
Bureau of Air Quality Management
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Proposed Permit #AC 16-261912
D-Graphics
Jacksonville, Florida

Dear Mr. Logan:

After careful review of the subject permit and accompanying documents, there are several points we wish to bring to your attention which we believe may be detrimental to D-Graphics. The attached comments address those areas and offer new language to remove any unclear or overly-restrictive wording, while maintaining the intent of the permit.

Please call me at 904/733-4020 or Jim Manning at 904/269-7012 to more thoroughly discuss the comments. Thank you for your extra effort in preparing the proposed construction permit and for working with D-Graphics on these issues.

Sincerely,

Doug Turner
Doug Turner (as)
Plant Manager

Enclosure

cc: Steve Pace, P. E., RESD
Chris Kirts, P. E., FDEP
Jim Manning, P. E.

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Comments on the Proposed Construction Permit
D-Graphics
January 6, 1994

General:

On page 1, paragraph 1, of the Notice of Intent to Issue; on page 3, Section III. Emissions and Section IV. Rule Applicability, of the Technical Evaluation and Preliminary Determination; and on page 1 of the permit, the phrase, "...the minimum capture/transport efficiency shall be 100%...", appears. The word "minimum" should be removed for clarity because the efficiency will be 100% by definition of Procedure T, and because the efficiency cannot exceed 100%.

Language needs to be added to the permit to allow time for 'debugging' and tuning Press No. 4 and the collection system after construction/installation is complete. We suggest adding a sentence to the end of Specific Condition 17 as follows:

17. "... The initial compliance test shall be conducted within 60 days of initial start-up of Press No. 4, but not later than 120 days after completion of construction/installation."

Specific Conditions:

We request the following Specific Conditions be rewritten as follows:

9. "...has constructed/installed or is in the process of constructing/installing the No. 4 Press..."

10. After the TMS is operational and in compliance, the maximum total allowable annual emissions of VOC from the facility shall be 95 tons. The maximum allowable hourly emissions from the facility when both presses are operating shall be 28.8

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lbs/hr. The maximum allowable hourly emissions when only Press No. 4 is operating shall be 17.5 lbs/hr. The maximum allowable hourly emissions when only Press No. 5 is operating shall be 22.5 lbs/hr.

11. Maximum hours of operation per year for Press No. 4 shall be 6,600 hours for any calendar year in which both presses operate. In the event that only Press No. 4 will operate in a calendar year, the maximum hours of operation for that year shall be 8,760 hours. Operation is defined as run time.
12. Maximum hours of operation per year for Press No. 5 shall be 6,600 hours for any calendar year in which both presses operate. In the event that only Press No. 5 will operate in a calendar year, the maximum hours of operation for that year shall be 8,444 hours. Operation is defined as run time.
13. Maximum VOC applied to the substrates of both presses combined when both presses are operating shall be 575 lbs/hr. Maximum VOC applied to the substrate of Press No. 4 when only Press No. 4 is operating shall be 350 lbs/hr. Maximum VOC applied to the substrate of Press No. 5 when only Press No. 5 is operating shall be 450 lbs/hr.

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Condition 11.

$$\begin{aligned} \text{Max. hr/yr} &= \text{hr}/350(0.05) \text{ lbs} \times 95 \text{ tons/yr} \times 2,000 \text{ lbs/ton} \\ &= 10,857 \text{ hr/yr} \quad (\text{Maximum} = 8,760) \end{aligned}$$

Condition 12.

$$\begin{aligned} \text{Max. hr/yr} &= \text{hr}/450(0.05) \text{ lbs} \times 95 \text{ tons/yr} \times 2,000 \text{ lbs/ton} \\ &= 8,444 \text{ hr/yr} \end{aligned}$$