

SERVICES DEPARTMENT

FAX COVER SHEET

AIR QUALITY DIVISION

421 West Church Street, Suite 412  
Jacksonville, Florida 32202  
(904)630-3484 (OFFICE)  
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DATE: 1/9/95 TIME: 1:17P

TO: Bruce Mitchell FAX #: 904-722-6927  
DEP

MESSAGE: \_\_\_\_\_  
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FROM: Robert P. [unclear]

NUMBER OF PAGES FAXED (including cover): \_\_\_\_\_

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REGULATORY & ENVIRONMENTAL  
SERVICES DEPARTMENT  
Air Quality Division

January 5, 1995

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JAN 11 1995



Bureau of  
Air Regulation

Mr. Clair H. Fancy, P.E.  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

Re: Duval County - Air Pollution  
D-Graphics, Construction  
Permit Application AC16-261912

Dear Mr. Fancy:

The Regulatory and Environmental Services Department, Air Quality Division (AQD) provides the following comments on the draft permit as referenced above:

A. **Specific Condition No. 7.** This condition requires compliance testing every six months for the facility in it's present configuration, prior to a Total Enclosure System (TES) being operational and in compliance. The capture efficiency test procedures referenced in Specific Condition 15 of this permit are applicable to a TES. The current plant configuration is not a TES and therefore these procedures are not applicable. Other testing methods for capture efficiency listed in Section 62-297.440 and 62-297.450 F.A.C. require the use of an enclosure of some type (i.e.: permanent, temporary, or the building). None of these options appear to be feasible especially in light of the soon to be installed TES which is the prime focus of this construction permit.

AQD recommends use of the current test procedures for capture efficiency which were part of the original Consent Final Judgement with Austill Packaging in 1985. If necessary this test procedure can be approved through Rule 62-297.620, F.A.C. (Alternate Sampling Procedure). It is expected that this test procedure would only be used for a maximum of three testing periods (i.e.: February 1995, August 1995, and February 1996). In fact the ASP could be for a limited time (i.e.: Expires July 1, 1996 ) unless extended by the DEP.



421 West Church Street - Suite 412  
Jacksonville, Florida 32202-4111

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Mr. Clair H. Fancy, P.E., Chief  
January 5, 1995  
Page 2

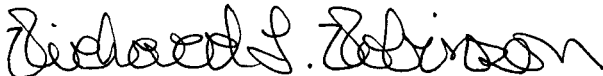
**B. Specific Condition No. 21.** AQD recommends that the test frequency for the future operating permit or Title V permit not be specified in the construction permit. Other than the original compliance test requirement the testing frequency is usually established by the permitting authority writing the operating permit.

AQD believes the five year interval for testing of a synthetic minor facility with the new operating configuration of the TES and a catalytic incinerator would not provide reasonable assurance of continuous compliance.

If an interval is absolutely necessary in the construction permit, AQD recommends that annual testing be required. Once a satisfactory level of continuous compliance is established, the applicant can request that the testing frequency be adjusted.

If you have any questions concerning the capture efficiency testing proposal please contact Mr. Wayne Tutt. Other questions may be directed to Mr. Jerry Woosley or me. Our Suncom number is 986-3484 or (904) 630-3484.

Very truly yours,



Richard L. Robinson, P.E.  
Pollution Control Engineer

RLR/JEW/ecr

Enc.

c: Mr. Douglas Turner, D-Graphics  
Mr. James Manning, P. E.  
Mr. Chris Kirts, P.E., DEP/NED  
Mr. Wayne Tutt, AQD  
Mr. Jerry Woosley, AQD  
Air Permitting File  
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