

Check Sheet

Company Name:

D-GRAPHICS

Permit Number:

AC16-261912

PSD Number:

Permit Engineer:

(JSC/CCA)

Cross References:

-
-
-

JEPPERSON SMURFIT/
CONTAINER CORPORATION
OF AMERICA

GREEN CARD?

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT or LAER Determination
- Unsigned Permit
- Correspondence with:
 - EPA
 - Park Services
 - Other

- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)
- Waiver of Department Action
- Other

Final Determination:

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

In the folder labeled as follows there are documents, listed below, which were not reproduced in this electronic file. That folder can be found in one of the file drawers labeled Supplementary Documents Drawer. Folders in that drawer are arranged alphabetically, then by permit number.

Folder Name: D-Graphics (JSC/CCA)

Permit(s) Numbered:

AC	16	-	261912
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Period during
which document
was received:

Detailed Description

Period during which document was received:		Detailed Description
APPLICATION 5 DEC 1994	1.	24"×36" BLUEPRINT: ENCLOSURE EXHAUST SCHEMATIC (DRAWING NUMBER: SCHM00009)
	2.	24"×36" BLUEPRINT: ENCLOSURE EXHAUST SCHEMATIC (DRAWING NUMBER: SCHM00010)
	3.	24"×36" BLUEPRINT: PRELIMINARY ENCLOSURE LAYOUT (DRAWING NUMBER: LYOT00013)
8 MAY 1995	4.	22"×34" BLUEPRINT: PRELIMINARY PRESS #5 ROOFTOP DUCTWORK LAYOUT (DRAWING NUMBER: LYOT00019)

[AIAS#]-0310238-001-AC

REGULATORY & ENVIRONMENTAL SERVICES DEPARTMENT

Air Quality Division



December 5, 1995

Mr. Jefferson Braswell, Esquire
Assistant General Counsel
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**RE: Duval County - Air Pollution
Jefferson Smurfit Corporation, D-Graphics Division
Withdraw Request for Extension of Time to File a Petition for an Administrative Hearing
Amendment to Construction Permit, AC16-261912(A)**

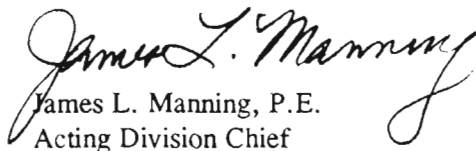
Dear Mr. Braswell:

The City of Jacksonville, Air Quality Division (AQD), has received a new construction permit amendment (AC16-261912[A-2]) issued by the Department of Environmental Protection, Division of Air Resources Management (DARM), on November 30, 1995 for the D-Graphics rotogravure printing operation located in Jacksonville. The new amendment was received at our office on December 4, 1995.

The purpose of this letter is to **withdraw our request for** an extension of 45 days in which to petition for an administrative hearing on the initial Amendment (AC16-261912[A]) issued by DARM on November 13, 1995. AQD is withdrawing the time extension request because the new permit amendment contains revised conditions acceptable to AQD, DARM and D-Graphics.

Should you have any questions or comments regarding this request, please contact Mr. Richard Robinson, P.E., at (904) 630-3484.

Very truly yours,


James L. Manning, P.E.
Acting Division Chief

JLM/RLR/sa

- c: ✓ Mr. Clair Fancy, P.E., DEP/DARM/Tallahassee
- Mr. Douglas Turner, D-Graphics Division
- Mr. Gregory Radlinski, Esquire, OGC/Jacksonville
- Files 1120-F & 1120-G
- AQD Permitting File

Equal Opportunity/Affirmative Action Employer



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

Area Code (904) 630-3484



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 30, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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



Dear Mr. Turner:

RE: Amendment to Construction Permit
AC 16-261912 (A-2), D-Graphics

The Department has reviewed the compliance testing requirements and methods for determining the VOC emissions from the facility during a calendar year. The air construction permit, previously amended on November 9, is amended as follows:

A. Emission Limits and Reporting Requirements

Specific Condition No. 10 is amended as follows;

FROM

10. After the TES is operational and in compliance, the permittee shall maintain a log book at the facility for recording the actual run hours of each press on a daily basis, from which the actual net "run time" (RT) in hours can be tabulated and verified. The permittee shall notify the Duval County's R&ESD office in writing once the facility achieves 85 tons of VOC emissions; and, the VOC emissions shall be assessed on a weekly basis, thereafter.

TO

10. After the TES is operational and in compliance, the permittee shall maintain a log book at the facility for recording the actual run hours of each press on a daily basis, from which the actual net "run time" (RT) in hours can be tabulated and verified. The permittee shall notify the Duval County's R&ESD office in writing once the facility achieves 85 tons of VOC emissions; and, the VOC emissions shall be assessed on a weekly basis, thereafter. The following formula shall be used to assess the maximum allowable VOC emissions from the facility during a

Mr. Douglas V. Turner
AC 16-261912 (A-2)
Amendment Request
November 30, 1995
Page 2 of 4

calendar year:

(#4 Run Time + #5 Run Time) 14.375 lbs/hr ≤ 95 Tons
2000 lbs/ton

Note: The total run time of both presses shall be limited to 13,217 hours per calendar year

Specific Condition No. 17 is amended as follows;

FROM

17. The initial and subsequent compliance tests shall be performed at maximum operating conditions for a single press (the No. 4 press and the No. 5 press operating independently of the other), for a total of two separate compliance tests. The initial compliance tests on the No. 4 press shall be conducted within 60 days after initial start-up of the press. A 95% total destruction of all VOC emissions delivered to the inlet of the catalytic oxidizing system shall be demonstrated by these compliance tests.

TO

17. The initial compliance tests shall be performed at maximum operating conditions for a single press (the No. 4 press and the No. 5 press operating independently of the other) and multiple press operations (the No. 4 press and the No. 5 press operating concurrently), for a total of three separate compliance tests. The initial compliance tests on the No. 4 press shall be conducted within 60 days after initial start-up of the press. A 95% total destruction of all VOC emissions delivered to the inlet of the catalytic oxidizing system shall be demonstrated by these compliance tests. After the initial compliance tests are completed, the sufficiency of the number and frequency of tests to demonstrate compliance with the VOC destruction efficiency requirements for this facility shall be determined by the Department. If the determination shows that changes to the permit conditions are necessary, these changes shall be incorporated into the facility operating permit.

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. The petition must contain

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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 applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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, Florida Statutes.

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;
- (g) A statement of the relief sought by petitioner, stating precisely the action the 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 amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/ application have the right to

Mr. Douglas V. Turner
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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 receipt of this amendment 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, F.A.C.

This letter amendment must be attached to Construction Permit No. AC 16-261912 (A) as No. AC-16-261912 (A-2), and shall become part of the permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

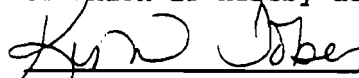
HLR/CSL

cc: J. Manning, R&ESD
C. Kirts, NED
J. Harper, EPA
J. Bunyak, NPS

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 11-30-95 to the listed persons.

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

11-30-95
Date



Department of Environmental Protection

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

December 4, 1995

Certified Mail—Return Receipt Requested

Mr. Douglas V. Turner
Plant Manager
Jefferson Smurfit Corporation
D-Graphics
3389 Powers Avenue
Jacksonville, Florida 32207

Dear Mr. Turner:

Enclosed is a copy of an administrative order concerning the request for approval to use the EPA's proposed Method 204 for verifying that the enclosure surrounding press number 4 and press number 5 (permit number AC 16-261912) conforms to the requirements for a permanent total enclosure.

If you have any questions about the above, please call Ramesh Menon at 904/488-6140, or write to me.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Harley".

Michael D. Harley, P.E., DEE
P.E. Administrator
Emissions Monitoring Section

Enclosure

cc: Pat Comer, FDEP
Chris Kirts, FDEP Northeast District
Jim Manning, Jacksonville RESD

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:)	Permit No.	AC 16-261912
)		
Jefferson Smurfit Corp.,)		
)	ASP No.	95-G-01
Petitioner.)		

ORDER ON REQUEST
FOR
ALTERNATE PROCEDURES AND REQUIREMENTS

Pursuant to Rule 62-297.620, Florida Administrative Code (F.A.C.), D-Graphics Division of Jefferson Smurfit Corporation petitioned for approval to use the EPA's proposed Method 204 (60 FR 39297) in lieu of Procedure T which is required by Rule 62-297.450, F.A.C., for verifying compliance with the permanent total enclosure criteria applicable to press number 4 and press number 5, permit number AC 16-261912, at Petitioner's facility in Duval County.

Having considered Petitioner's written request and all supporting documentation, the following Findings of Fact, Conclusions of Law, and Order are entered:

FINDINGS OF FACT

1. On November 20, 1995, Petitioner specifically requested approval to employ an alternate procedure for verifying that the enclosure surrounding press number 4 and press number 5 conforms to the requirements for a permanent total enclosure in lieu of Procedure T which is required by Rule 62-297.450, F.A.C. The proposed alternative would allow Petitioner to verify compliance with permanent total enclosure requirements by measuring pressure drop across the enclosure and conducting smoke tests using the EPA's proposed Method 204. [Exhibit 1]

2. As justification for the use of the EPA's proposed Method 204, Petitioner stated, "This facility currently is operating under construction permit #AC 16-261912 which, under specific condition #15, states, that the Total Enclosure System be verified pursuant to Rule 62-297.440(7)(f), F.A.C. In particular, this rule references Procedure T, adopted in March, 1990, which gives the procedures for verifying a Permanent Total Enclosure." [Exhibit 1]

3. Petitioner further stated, "This procedure presents a hardship with the Total Enclosure System that D-Graphics has designed. Our total enclosure uses a pressure monitor to maintain a constant negative pressure inside of the enclosure. This is

accomplished by continuously adjusting a variable position damper that regulates the amount of outside air entering the enclosure. If D-Graphics were to measure air flows into the enclosure, we would be unable to get a consistent and accurate measure since the rate of outside air into the enclosure is constantly changing. This, along with the fact that the area of the NDO's is zero, would make the accurate calculation of face velocity impossible." [Exhibit 1]

4. Section 8.5 of the the U. S. EPA's proposed Method 204 states, "Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.0075 mmHg (.004 in. H₂O) corresponds to a FV of 3,600 m/hr (200 fpm)." [Exhibit 2]

CONCLUSIONS OF LAW

1. The Department has jurisdiction to consider Petitioner's request pursuant to Section 403.061, Florida Statutes (F.S.), and Rule 62-297.620, F.A.C.

2. Pursuant to Rule 62-297.340(2), F.A.C., the Department may require Petitioner to conduct compliance tests that identify the nature and quantity of pollutant emission, if, after investigation, it is believed that any applicable emission standard or condition of a permit is being violated.

3. Petitioner has provided reasonable justification that the use of EPA Method 204 as proposed on page 39297 of the August 2, 1995 Federal Register will be adequate to verify compliance with the permanent total enclosure requirements of permit number AC 16-261912.

ORDER

Having considered Petitioner's written request and supporting documentation, it is hereby ordered that:

1. Petitioner's request to use EPA Method 204 as proposed on page 39297 of the August 2, 1995 Federal Register for verification of compliance with the permanent total enclosure requirements of permit number AC 16-261912 is granted;

2. The pressure drop sensor which controls the dampers shall be calibrated in accordance with the recommendations of the manufacturer with regard to frequency and methodology;

3. Petitioner shall install a device to continuously record the pressure drop across the enclosure during the EPA Method 204 testing;

4. The pressure drop shall be the average of the readings recorded during the test;

5. The Department retains the right to require Petitioner to

verify compliance with the permanent total enclosure criteria, pursuant to Rule 62-297.450, F.A.C., if after investigation, it is believed that these methods are necessary to accurately assess the compliance status of the affected source; and,

6. Pursuant to Rule 62-297.570(2), F.A.C., Petitioner shall submit the compliance test report to the Chief, Air Quality Division of the Duval County Regulatory and Environmental Services Department and to the District Director of the Department's Northeast District Office within 45 days of completion of the test.

PETITION FOR ADMINISTRATIVE REVIEW

1. A person whose substantial interests are affected by the Department's 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 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3200, within 21 days of receipt of this Order. The petitioner shall mail a copy of the petition to the applicant 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.

2. The petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, and the Department File Number;

(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 each petitioner, if any;

(e) A statement of facts which each petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes each petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by each petitioner, stating precisely the action each petitioner wants the Department to take with respect to the Department's action or proposed action.

3. 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 Order. Persons whose substantial interests will be affected by any decision of the Department with regard to the petition have the right to petition to become a party to the proceeding. The petition must conform with the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3200. 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.


4. This Order constitutes final agency action unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time, this Order will not be effective until further Order of the Department.

RIGHT TO APPEAL

Any party to this Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., 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, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3200; 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 the Notice of Agency Action is filed with the Clerk of the Department.

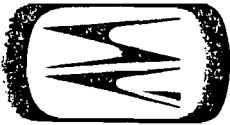
DONE AND ORDERED this 1 day of December, 1995 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



HOWARD L. RHODES
Director
Division of Air Resources Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

(904) 488-0114



**JEFFERSON SMURFIT CORPORATION
D-Graphics Division**

November 20, 1995

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

Mike Harley, P.E.
Division of Air Resources Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Building
Tallahassee, Florida 32399-2400

Certified Mail
Return Receipt
P163 780 056

RE: Request for an alternate testing procedure for verification
of a Permanent Total Enclosure.

Dear Mr. Harley:

The purpose of this letter is to officially request an alternate testing procedure for the verification of our Permanent Total Enclosure for Press #4 and Press #5 at our facility in Jacksonville, Florida.

This facility currently is operating under construction permit # AC 16-261912 which, under specific condition #13, states that the Total Enclosure System be verified pursuant to Rule 32-297.440(7)(f) F.A.C. In particular, this rule references Procedure T, adopted in March, 1990, which gives the procedures for verifying a Permanent Total Enclosure. The procedure for which D-Graphics is requesting an alternate procedure is 5.3 which in part reads as follows:

5.3 Measure the volumetric flow rate, corrected to standard conditions, of each gas stream exiting the enclosure through an exhaust duct or hood using EPA Method 2. Calculate FV using the following equation: $FV = (Q_o - Q_i)/A_n$.

This procedure presents a hardship with the Total Enclosure System that D-Graphics has designed. Our total enclosure uses a pressure monitor to maintain a constant negative pressure inside of the enclosure. This is accomplished by continuously adjusting a variable position damper that regulates the amount of outside air entering the enclosure. If D-Graphics were to measure air flows into the enclosure, we would be unable to get a consistent and accurate measure since the rate of outside air into the enclosure is constantly changing. This, along with the fact that the area of the NDO's is zero, would make the accurate calculation of the face velocity impossible.

D-Graphics proposes that an alternate procedure is used to replace procedure 5.3. In particular, we reference the recently

Exhibit 1

Mike Harley, P.E.

Page 2

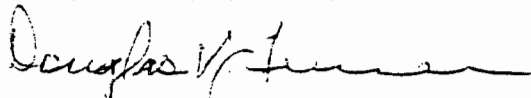
proposed rule Vol. 60 No. 148 Wednesday, August 2, 1995 p 39297 from 40 CFR Part 51. As part of this is Method 204 - Criteria for and Verification of a Permanent or Temporary Total Enclosure. Stated in Method 204 are the procedures for verification. Part 8.3 reads identical to part 5.3 of the Procedure T with the exception that method 204 also contains the following:

"Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.0075 mm Hg (0.004 in H₂O) corresponds to an FV of 3,600 m/hr (200 fpm)."

It is this alternative method which D-Graphics is requesting to use. Since the system uses a pressure control to maintain the negative pressure inside of the enclosure, it will be more accurate and less burdensome to observe the pressure differential using the pressure controller.

We appreciate your cooperation and effort in resolving this matter. If you need further information or have any questions regarding this matter, please feel free to contact me at 904/733-4020.

Very truly yours,



Douglas V. Turner
Plant Manager

Enclosures

cc: Richard L. Robinson, P.E., R&ESD
Wayne E. Tutt, R&ESD
Wayne Gilsdorf, Jefferson Smurfit
Bob Dinehart, Jefferson Smurfit

**METHOD 204--CRITERIA FOR AND VERIFICATION OF A PERMANENT OR
TEMPORARY TOTAL ENCLOSURE**

1. SCOPE AND APPLICATION

This procedure is used to determine whether a permanent or temporary enclosure meets the criteria for a total enclosure. An existing building may be used as a temporary or permanent enclosure as long as it meets the appropriate criteria described in this method.

2. SUMMARY OF METHOD

An enclosure is evaluated against a set of criteria. If the criteria are met and if all the exhaust gases from the enclosure are ducted to a control device, then the volatile organic compounds (VOC) capture efficiency (CE) is assumed to be 100 percent, and CE need not be measured. However, if part of the exhaust gas stream is not ducted to a control device, CE must be determined.

3. DEFINITIONS

3.1 Natural Draft Opening (NDO). Any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.

3.2 Permanent Total Enclosure (PE). A permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge to a control device.

3.3 Temporary Total Enclosure (TTE). A temporarily installed enclosure that completely surrounds a source of

emissions such that all fugitive VOC emissions are captured and contained for discharge through ducts that allow for the accurate measurement of fugitive VOC emissions.

3.4 Building Enclosure (BE). An existing building that is used as a TTE.

4. SAFETY

An evaluation of the proposed building materials is recommended to minimize any potential hazards.

5.1 CRITERIA FOR TEMPORARY TOTAL ENCLOSURE

5.1 Any NDO shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.

5.2 Any exhaust point from the enclosure shall be at least four equivalent duct or hood diameters from each NDO.

5.3 The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

5.4 The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.

5.5 All access doors and windows whose areas are not included in Section 6.1.3 and are not included in the calculation in Section 6.1.4 shall be closed during routine operation of the process.

6 CRITERIA FOR A PERMANENT TOTAL ENCLOSURE

6.1 Same as Sections 6.1.1 and 6.1.3 through 6.1.5.

6.2 All VOC emissions must be captured and contained for discharge through a control device.

7. QUALITY CONTROL

7.1 The success of this method lies in designing the TTE to simulate the conditions that exist without the TTE (i.e., the effect of the TTE on the normal flow patterns around the affected facility or the amount of fugitive VOC emissions should be minimal). The TTE must enclose the application stations, coating reservoirs, and all areas from the application station to the oven. The oven does not have to be enclosed if it is under negative pressure. The NDO's of the temporary enclosure and a fugitive exhaust fan must be properly sized and placed.

7.2 Estimate the ventilation rate of the TTE that best simulates the conditions that exist without the TTE (i.e., the effect of the TTE on the normal flow patterns around the affected facility or the amount of fugitive VOC emissions should be minimal). Figure 204-1 may be used as an aid. Measure the concentration (C_G) and flow rate (Q_G) of the captured gas stream, specify a safe concentration (C_F) for the fugitive gas stream, estimate the CE, and then use the plot in Figure 204-1 to determine the volumetric flow rate of the fugitive gas stream (Q_F). A fugitive VOC emission exhaust fan that has a variable flow control is desirable.

7.3 Monitor the concentration of VOC into the capture device without the TTE. To minimize the effect of temporal variation on

the captured emissions, the baseline measurement should be made over as long a time period as practical. However, the process conditions must be the same for the measurement in Section 6.5 as they are for this baseline measurement. This may require short measuring times for this quality control check before and after the construction of the TTE.

7.4 After the TTE is constructed, monitor the VOC concentration inside the TTE. This concentration shall not continue to increase, and must not exceed the safe level according to Occupational Safety and Health Administration requirements for permissible exposure limits. An increase in VOC concentration indicates poor TTE design or poor capture efficiency.

7.5 Monitor the concentration of VOC into the capture device with the TTE. To limit the effect of the TTE on the process, the VOC concentration with and without the TTE must be within 10 percent. If the measurements do not agree, adjust the ventilation rate from the TTE until they agree within 10 percent.

8. PROCEDURE

8.1 Determine the equivalent diameters of the NDO's and determine the distances from each VOC emitting point to all NDO's. Determine the equivalent diameter of each exhaust duct or hood and its distance to all NDO's. Calculate the distances in terms of equivalent diameters. The number of equivalent diameters shall be at least four.

8.2 Measure the total area (A_T) of the enclosure and the

total area (A_N) of all NDO's in the enclosure. Calculate the NDO to enclosure area ratio (NEAR) as follows:

$$NEAR = \frac{A_N}{A_T} \quad \text{Eq. 204-1}$$

The NEAR must be ≤ 0.05 .

8.3 Measure the volumetric flow rate, corrected to standard conditions, of each gas stream exiting the enclosure through an exhaust duct or hood using EPA Method 2. In some cases (e.g., when the building is the enclosure), it may be necessary to measure the volumetric flow rate, corrected to standard conditions, of each gas stream entering the enclosure through a forced makeup air duct using Method 2. Calculate FV using the following equation:

$$FV = \frac{Q_o - Q_I}{A_N} \quad \text{Eq. 204-2}$$

where:

Q_o = the sum of the volumetric flow from all gas streams exiting the enclosure through an exhaust duct or hood.

Q_I = the sum of the volumetric flow from all gas streams into the enclosure through a forced makeup air duct; zero, if there is no forced makeup air into the enclosure.

A_N = total area of all NDO's in enclosure.

The FV shall be at least 3,600 m/hr (200 fpm).

Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.0075 mm Hg (0.004 in. H₂O)

corresponds to an FV of 3,600 m/hr (200 fpm).

8.4 Verify that the direction of air flow through all NDO's is inward. Streamers, smoke tubes, or tracer gases may be used. Strips of plastic wrapping film have also been found to be effective. Monitor the direction of air flow for at least 1 hour, with checks made no more than 10 minutes apart.

9. DIAGRAMS

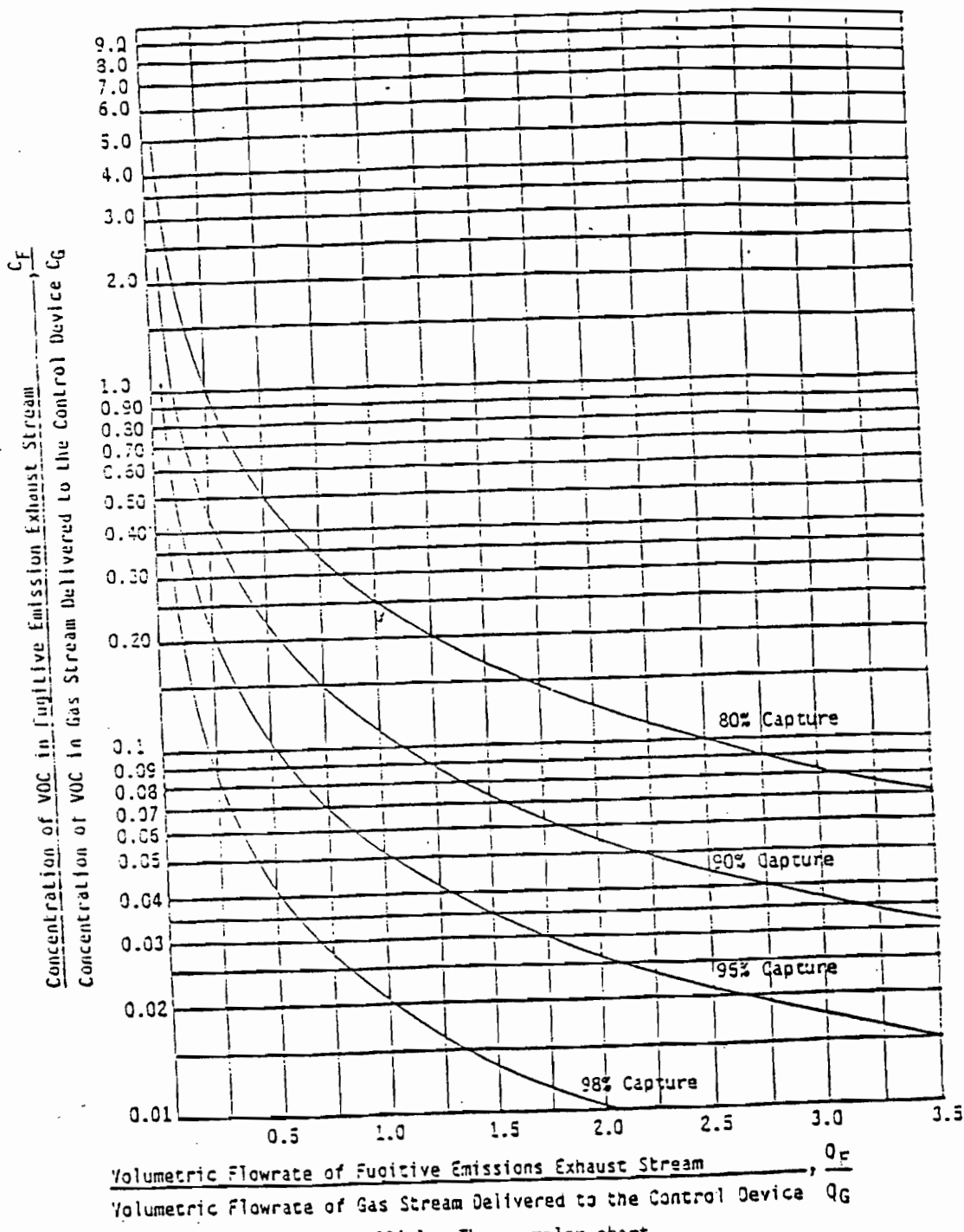


Figure 204-1. The crumpler chart.

Is your RETURN ADDRESS completed on the reverse side...

SEND:

- Complete item
- Complete item
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to:
 Douglas V. Turner, Plant Mgr
 R- Graphics Division
 3389 Powers Ave
 Jacksonville, FL 32231

5. Signature (Addressee)
Douglas V. Turner
 6. Signature (Agent)

- fee):
- Addressee's Address
 - Restricted Delivery
- Consult postmaster for fee.

4a. Article Number
 Z 127 632 585

- 4b. Service Type
- | | |
|---|---|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

7. Date of Delivery
 12/4/95

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Serv

Z 127 632 585



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to <i>Douglas Turner</i>	
Street and No. <i>R- Graphics</i>	
City, State and ZIP Code <i>Jax, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	11-30-95
Article-261912 (A-2)	

PS Form 3800, March 1993



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 30, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Turner:

RE: Amendment to Construction Permit
AC 16-261912 (A-2), D-Graphics

The Department has reviewed the compliance testing requirements and methods for determining the VOC emissions from the facility during a calendar year. The air construction permit, previously amended on November 9, is amended as follows:

A. Emission Limits and Reporting Requirements

Specific Condition No. 10 is amended as follows;

FROM

10. After the TES is operational and in compliance, the permittee shall maintain a log book at the facility for recording the actual run hours of each press on a daily basis, from which the actual net "run time" (RT) in hours can be tabulated and verified. The permittee shall notify the Duval County's R&ESD office in writing once the facility achieves 85 tons of VOC emissions; and, the VOC emissions shall be assessed on a weekly basis, thereafter.

TO

10. After the TES is operational and in compliance, the permittee shall maintain a log book at the facility for recording the actual run hours of each press on a daily basis, from which the actual net "run time" (RT) in hours can be tabulated and verified. The permittee shall notify the Duval County's R&ESD office in writing once the facility achieves 85 tons of VOC emissions; and, the VOC emissions shall be assessed on a weekly basis, thereafter. The following formula shall be used to assess the maximum allowable VOC emissions from the facility during a

Mr. Douglas V. Turner
AC 16-261912 (A-2)
Amendment Request
November 30, 1995
Page 2 of 4

calendar year:

$$\frac{(\#4 \text{ Run Time} + \#5 \text{ Run Time}) 14.375 \text{ lbs/hr} \leq 95 \text{ Tons}}{2000 \text{ lbs/ton}}$$

Note: The total run time of both presses shall be limited to 13,217 hours per calendar year

Specific Condition No. 17 is amended as follows;

FROM

17. The initial and subsequent compliance tests shall be performed at maximum operating conditions for a single press (the No. 4 press and the No. 5 press operating independently of the other), for a total of two separate compliance tests. The initial compliance tests on the No. 4 press shall be conducted within 60 days after initial start-up of the press. A 95% total destruction of all VOC emissions delivered to the inlet of the catalytic oxidizing system shall be demonstrated by these compliance tests.

TO

17. The initial compliance tests shall be performed at maximum operating conditions for a single press (the No. 4 press and the No. 5 press operating independently of the other) and multiple press operations (the No. 4 press and the No. 5 press operating concurrently), for a total of three separate compliance tests. The initial compliance tests on the No. 4 press shall be conducted within 60 days after initial start-up of the press. A 95% total destruction of all VOC emissions delivered to the inlet of the catalytic oxidizing system shall be demonstrated by these compliance tests. After the initial compliance tests are completed, the sufficiency of the number and frequency of tests to demonstrate compliance with the VOC destruction efficiency requirements for this facility shall be determined by the Department. If the determination shows that changes to the permit conditions are necessary, these changes shall be incorporated into the facility operating permit.

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. The petition must contain

Douglas V. Turner
AC 16-261912 (A-2)
Amendment Request
November 30, 1995
Page 3 of 4

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 applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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, Florida Statutes.

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;
- (g) A statement of the relief sought by petitioner, stating precisely the action the 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 amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/ application have the right to

Mr. Douglas V. Turner
AC 16-261912 (A-2)
Amendment Request
November 30, 1995
Page 4 of 4

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 receipt of this amendment 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, F.A.C.

This letter amendment must be attached to Construction Permit No. AC 16-261912 (A) as No. AC-16-261912 (A-2), and shall become part of the permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/CSL

cc: J. Manning, R&ESD
C. Kirts, NED
J. Harper, EPA
J. Bunyak, NPS

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 11-30-95 to the listed persons.

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

11-30-95
Date

Memorandum

Florida Department of
Environmental Protection

To: Howard L. Rhodes
From: Clair Fancy *CF*
Date: November 30, 1995
Subject: Approval of Construction Permit Amendment
AC 16-261912 (A-2)
D-Graphics Division

Attached for your approval and signature is an amendment to a construction permit prepared by the Bureau of Air Regulation for the Jefferson Smurfit Corporation, D-Graphics Division. The purpose of this amendment is to simplify the compliance testing requirements and add an equation to the permit for determining the total VOC emissions from the facility during a calendar year. This amendment supplements another which we recently issued to reduce the maximum allowable emissions from each press. Both the Duval County's R&ESD and D-Graphics concur with this amendment. This amendment is not controversial and will not cause an increase in annual allowable emission limits or result in any equipment change.

This amendment is recommended for your approval and signature.

CF/CSL

**REGULATORY & ENVIRONMENTAL
SERVICES DEPARTMENT**

Air Quality Division



November 22, 1995

RECEIVED
NOV 29 1995
BUREAU OF
AIR REGULATION

Mr. Jefferson Braswell, Esquire
Assistant General Counsel
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**RE: Duval County - Air Pollution
Jefferson Smurfit Corporation, D-Graphics Division
Request for Extension of Time to File a Petition for an Administrative Hearing
Amendment to Construction Permit, AC16-261912(A)**

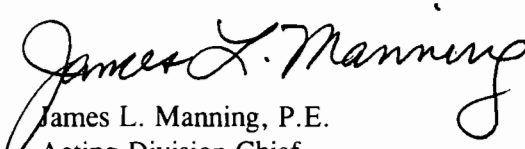
Dear Mr. Braswell:

The City of Jacksonville, Air Quality Division (AQD), has received the referenced amendment issued by the Department of Environmental Protection, Division of Air Resources Management (DARM), on November 13, 1995 for the D-Graphics rotogravure printing operation located in Jacksonville. The amendment was received at our office on November 16, 1995.

The purpose of this letter is to request an extension of 45 days in which to petition for an administrative hearing in accordance with Section 120.57, Florida Statutes. AQD is requesting the extension in order to complete discussions with DARM and D-Graphics on proposed changes to the referenced amendment.

Should you have any questions or comments regarding this request, please contact Mr. Richard Robinson, P.E., at (904) 630-3484.

Very truly yours,


James L. Manning, P.E.
Acting Division Chief

JLM/RLR/sa

c: Mr. Clair Fancy, P.E., DEP/DARM/Tallahassee
Mr. Douglas Turner, D-Graphics Division
Mr. Gregory Radlinski, Esquire, OGC/Jacksonville

Equal Opportunity/Affirmative Action Employer



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

Area Code (904) 630-3484

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Douglas V. Turner
 D-Graphics Division
 3389 Powers Ave
 Jacksonville, FL 32231
 [Signature]

4a. Article Number
 Z 127 632 567

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
 11/20/95

5. Signature (Addressee)


6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

Z 127 632 567

Receipt for Certified Mail
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)


 UNITED STATES POSTAL SERVICE

Sent to
 Douglas Turner
 Street and No.
 D-Graphics
 P.O., State and ZIP Code
 Jacksonville, FL

Postage	
Certified Fee	\$
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	11-13-95

AC 16-261912(A)

PS Form 3800, March 1993



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 9, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Turner:

RE: Amendment to Construction Permit
AC 16-261912 (A)
D-Graphics

The Department has reviewed your request to simplify the reporting requirements by eliminating multiple VOC substrate loading limits and lowering the individual hourly VOC substrate loading limits for each rotogravure press to a common value. The request would lower the allowable VOC substrate loading emission limit from 350 lbs/hr for the No. 4 press and 450 lbs/hr for the No. 5 press to 287.5 lbs/hr. for each press. The Department's determination on these amendment requests are as follows:

A. Emission Limits and Reporting Requirements

Specific Condition No. 10 is amended as follows;

FROM

10. After the TES is operational and in compliance, the permittee shall maintain a log book at the facility for each press for recording the date(s) and the actual starting and ending times (i.e., hour, minute, and a.m. or p.m.) of each press's printing job, from which the actual net "run time" (RT) in hours can be verified and tabulated; and, the following formula shall be used to assess the total actual VOC emissions from the facility:

Mr. Douglas V. Turner
AC 16-261912 (A)
Amendment Request
November 9, 1995
Page 2 of 6

$$\frac{\#4 \text{ RT} \times 17.5 \text{ lbs/hr} + \#5 \text{ RT} \times 22.5 \text{ lbs/hr} + \#4 \ \& \ \#5 \text{ RT} \times 28.8 \text{ lbs/hr}}{2000} < 95.0 \text{ Tons}$$

Note: The notation "#4 & #5" is the concurrent operation of the two presses.

The permittee shall notify the Duval County's R&ESD office in writing once the facility achieves 85 tons of VOC emissions; and, the VOC emissions shall be assessed on a weekly basis, thereafter.

TO

10. After the TES is operational and in compliance, the permittee shall maintain a log book at the facility for recording the actual run hours of each press on a daily basis, from which the actual net "run time" (RT) in hours can be tabulated and verified. The permittee shall notify the Duval County's R&ESD office in writing once the facility achieves 85 tons of VOC emissions; and, the VOC emissions shall be assessed on a weekly basis, thereafter.

Specific Condition No. 11 is amended as follows;

FROM

11. When both presses are being operated concurrently, the maximum allowable VOC's 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.

TO

11. The combined maximum allowable VOC substrate loading at the No. 4 and No. 5 presses shall not exceed 575 lbs/hr (287.5 lbs/hr/press) and the maximum allowable VOC emissions from the facility shall not exceed 28.8 lbs/hr and 95.0 TPY.

Mr. Douglas V. Turner
AC 16-261912 (A)
Amendment Request
November 9, 1995
Page 3 of 6

Specific Condition No.12 is amended as follows;

FROM

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

TO

12. The maximum allowable VOC substrate loading at the No. 4 press shall not exceed 287.5 lbs/hr.

Specific Condition No.13 is amended as follows;

FROM

13. 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.

TO

13. The maximum allowable VOC substrate loading at the No. 5 press shall not exceed 287.5 lbs/hr.

Specific Condition No. 17 is amended as follows;

FROM

17. The initial and subsequent compliance tests shall be performed at maximum operating conditions for a single press (the No. 4 press and the No. 5 press operating independently of the other) and multiple press operations (the No. 4 press and the No. 5 press operating concurrently), for a total of three separate compliance tests. The initial compliance tests on the No. 4 press shall be

Mr. Douglas V. Turner
AC 16-261912 (A)
Amendment Request
November 9, 1995
Page 4 of 6

conducted within 60 days after initial start-up of the press. A 95% total destruction of all VOC emissions delivered to the inlet of the catalytic oxidizing system shall be demonstrated by these compliance tests.

TO

17. The initial and subsequent compliance tests shall be performed at maximum operating conditions for a single press (the No. 4 press and the No. 5 press operating independently of the other), for a total of two separate compliance tests. The initial compliance tests on the No. 4 press shall be conducted within 60 days after initial start-up of the press. A 95% total destruction of all VOC emissions delivered to the inlet of the catalytic oxidizing system shall be demonstrated by these compliance tests.

B. Attachments to be Incorporated;

- D-Graphics Division letter dated October 3, 1995

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. 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 applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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, Florida Statutes.

Mr. Douglas V. Turner
AC 16-261912 (A)
Amendment Request
November 9, 1995
Page 5 of 6

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;
- (g) A statement of the relief sought by petitioner, stating precisely the action the 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 amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/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 receipt of this amendment 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.

Mr. Douglas V. Turner
AC 16-261912 (A)
Amendment Request
November 9, 1995
Page 6 of 6

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.

This letter amendment must be attached to Construction Permit No. AC 16-261912 as No. AC-16-261912 (A), and shall become part of the permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/CSL

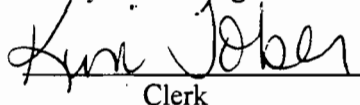
Attachment

cc: J. Manning, R&ESD
C. Kirts, NED
J. Harper, EPA
J. Bunyak, NPS

CERTIFICATE OF SERVICE

The undersigned duly designated duputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 11-13-95 to the listed persons.

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

 11-13-95
Clerk Date

ATTACHMENT



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

To: Howard Rhodes

From: Clair Fancy

A handwritten signature in black ink, appearing to be "CF", written over the name "Clair Fancy".

Date: November 9, 1995

Subject: Approval of Construction Permit Amendment
AC 16-261912 (A)
D-Graphics Division

Attached for your approval and signature is an amendment to a construction permit prepared by the Bureau of Air Regulation for the Jefferson Smurfit Corporation, D-Graphics Division. The purpose of this amendment is to simplify the reporting requirements by eliminating multiple VOC substrate loading limits and lowering the individual hourly VOC substrate loading limits for the No. 4 and No. 5 retrograture presses to a common value. This amendment will not cause an increase in annual allowable emission limits or result in any equipment change.

This amendment is recommended for your approval and signature.

CF/CSL

RECEIVED

JEFFERSON SMURFIT CORPORATION
D-GRAPHICS DIVISION

OCT 9 1995

Bureau of
~~Air Regulation~~3389 POWERS AVENUE
JACKSONVILLE, FL 32207
TELEPHONE: 904/733-4020
FAX: 904/733-4381

October 3, 1995

C. H. Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Building
Tallahassee, Florida 32399-2400

RE: Request to amend the construction permit # AC 16-261912 to lower the individual presses V.O.C. lbs/hour application rates.

Dear Mr. Fancy:

The purpose of this letter is to request an amendment to D-Graphics construction permit # AC 16-261912 to lower the restriction on the individual V.O.C. lbs/hr application rate on Press #4 from 350 lbs/hr to 287.5 lbs/hr (specific condition #12) and on Press #5 from 450 lbs/hr to 287.5 lbs/hr (specific condition #13). We request this amendment in order to balance the individual press loading requirements with the combined presses loading requirement of 575 lbs/hr. Our purpose in this is to make our reporting requirements less burdensome on our daily operations.

With this amendment to the construction permit there will be no increase in the hourly or yearly emissions from either press or the facility, but instead a reduction in the individual hourly rates. In addition, this amendment will not require any change of equipment, nor expenditures of any money.

By balancing the individual loading requirements of each press with the 575 lbs/hr that both presses combined are limited to, we hope to make the reporting requirements less complex. In particular, we request a change in the requirements that the daily hours of operation (specific condition # 10) and the daily V.O.C. application rates (specific condition # 18) be recorded separately when each press is running individually versus when they run concurrently. It would be less burdensome on D-Graphic's operations if each press is just tracked individually for daily hours of operations and V.O.C. application rates. In addition, by changing the maximum operating condition of each press individually to be equivalent to each press operating concurrently, we request that you eliminate the need to test each press individually as well as concurrently (specific condition #17).

As the current permit reads, D-Graphics would find it infeasible and extremely burdensome to record these measures in different categories depending on the operational status of each press. We



C. H. Fancy, P.E.

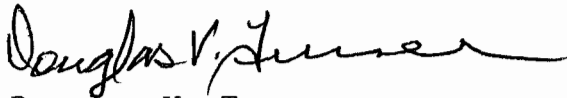
Page 2

believe that this amendment would potentially update specific conditions 10, 12, 13, 17, and 18.

We are close to having the Total Enclosure functional. Within 4 weeks we hope to start the debugging of all systems. It is our goal to perform a compliance test prior to December 1.

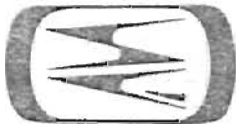
If there are any questions or issues that need to be clarified, please feel free to contact me at any time. I appreciate your effort and look forward to working with the department regarding these issues.

Very truly yours,



Douglas V. Turner
Plant Manager

cc: Mike Harley, P.E., DEP
Richard L. Robinson, P.E., R&ESD
Wayne E. Tutt, R&ESD
Wayne Gilsdorf, Jefferson Smurfit
Bob Dinehart, Jefferson Smurfit



JEFFERSON SMURFIT CORPORATION
D-GRAPHICS DIVISION

~~John Brody~~
Patty - To appropriate file

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

RECEIVED

MAY 8 1995

May 4, 1995

Bureau of
Air Regulation

Wayne Tutt
Department of Regulatory & Environmental Services
Air Quality Division
421 West Church Street, Suite 412
Jacksonville, Florida 32202-4111

RE: Construction of Press Relocation and Enclosure

Dear Mr. Tutt:

This letter is to notify you of some of our upcoming plans to begin the relocation process and construction of Press #4 which includes the Total Enclosure.

This work includes the upgrading of the collection system and replacing most of the roof top duct work for Press #5 which is necessary in order for us insure a proper Total Enclosure System. We expect this work to start around May 22th.

Enclosed you will find a draft schematic for the new duct work arrangement. If you have any questions or comments please contact me at 733-4020.

Sincerely,

Douglas Turner
Plant Manager
D-Graphics

cc: Mr. Clair Fancy, P.E., FDEP
Mr. Chris Kirts, P.E., FDEP
Mr. Terry Cole, Attorney at Law
Mr. James L. Manning, P.E.
Mr. Wayne Gilsdorf, Dinagraphics General Manager
Mr. Robert Dinehart, Consumer Packaging Division Engineer





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

February 7, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Douglas V. Turner
Plant Manager
D-Graphics Division
Jefferson Smurfit Corporation (U.S.)
3389 Powers Avenue
Jacksonville, Florida 32207

RE: Amendment to Construction Permit
AC 16-261912(A)
D-Graphics Division

Dear Mr. Turner:

The Department received a verbal request from Mr. Bob Williams on February 7, 1995, to amend the above referenced construction permit due to a proposed rule change that will reflect a new Title V operation permit application due date. If approved, the proposed change in Rule 62-213.420, Florida Administrative Code (F.A.C.), will result in a later due date for submitting the Title V Source operation permit application and the request is acceptable. Therefore, the subject permit is amended as follows:

A. Specific Condition No. 27

From

27. If the facility is a Title V Source and pursuant to Chapter 62-213, F.A.C., an application for a Title V Source operation permit shall be submitted to the Duval County's R&ESD office no later than April 2, 1995.

TO

27. If the facility is a Title V Source pursuant to Chapter 62-213, F.A.C., an application for a Title V Source operation permit shall be submitted to the Duval County's R&ESD office **on a schedule consistent with Rule 62-213.420, F.A.C.**

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

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Mr. Douglas V. Turner
AC 16-261912(A)
Amendment Request
February 7, 1995
Page 2 of 3

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 applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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 the 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 amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be

Mr. Douglas V. Turner
AC 16-261912(A)
Amendment Request
February 7, 1995
Page 3 of 3

filed (received) within 14 days of receipt of this amendment 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, F.A.C.

This letter amendment must be attached to the construction permit, No. AC 16-261912 (A) and shall become part of the permit. ^{spell} _{cut}

Sincerely,

Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/CSL

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on _____ to the listed persons.

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

Date

Florida Department of
Environmental Protection

Memorandum

TO : Howard Rhodes
FROM : Clair Fancy
DATE : February 7, 1995
SUBJECT: Approval of Construction Permit Amendment
AC 16-261912 (A)
D-Graphics Division

Attached for your approval and signature is an amendment to the Jefferson Smurfit Corporation (U.S.) D-Graphics Division's construction permit, which was prepared by the Bureau of Air Regulation. The permit is being amended as a result of a proposed change in Rule 62-213.420, F.A.C., which, if approved, will result in a later due date for submitting the Title V Source operation permit application. This amendment will not cause an increase in annual allowable emission limits or result in any equipment change.

This amendment is recommended for your approval and signature.

CF/CSL

Attachment



JEFFERSON SMURFIT CORPORATION
D-GRAPHICS DIVISION

ad
Bruce
Charles (?)
Files

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

January 30, 1995

RECEIVED

JAN 31 1995

Bureau of
Air Regulation

Mr. Clair Fancy, P.E.
Chief, Bureau of Air Regulation
Division of Air Resources Management
Department of Environmental Protection
111 South Magnolia Park Courtyard
Tallahassee, Florida 32301

RE: Jefferson Smurfit Corporation (U.S.)
Corporate Reorganization

Dear Mr. Fancy,

This will confirm our previous communication with Mr. Logan regarding our name change to:

Jefferson Smurfit Corporation (U.S.)
D-Graphics Division

On December 31, 1994 Jefferson Smurfit Corporation (U.S.) was merged into its wholly owned subsidiary Container Corporation of America, which in turn changed its name to Jefferson Smurfit Corporation (U.S.). Hence, the current name of the surviving corporation is Jefferson Smurfit Corporation (U.S.). The company will continue to do business under the names Container Corporation of America and Jefferson Smurfit Corporation.

If you need any more information or require any further submissions concerning this matter, please contact me at (904) 733-4020.

Sincerely,

Douglas Turner
Plant Manager

cc: Mr. Wayne Tutt, AQD
Mr. Chris Kirts, P.E., DEP/NED

Is your RETURN ADDRESS completed on the reverse side?

AC 16-261912, -257725 - to which file does it belong

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address

2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to: Mr. Douglas V. Turner Plant Manager D-Graphics Division Jefferson Smurfit Corp. (U.S.) 3389 Powers Avenue Jacksonville, FL 32207	4a. Article Number Z 392 940 714
	4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
	7. Date of Delivery
5. Signature (Addressee) <i>D. Saurill</i>	8. Addressee's Address (Only if requested and fee is paid)
6. Signature (Agent)	

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 DOMESTIC RETURN RECEIPT

Z 392 940 714

Receipt for Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)



Sent to	Mr. Douglas V. Turner
Street and No.	3389 Powers Avenue
P.O., State and ZIP Code	Jacksonville, FL 32207
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$

Postmark or Date

Mailed: 2/9/95
AC 16-261912(A)

PS Form 3800, March 1993



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

February 7, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Douglas V. Turner
Plant Manager
D-Graphics Division
Jefferson Smurfit Corporation (U.S.)
3389 Powers Avenue
Jacksonville, Florida 32207

RE: Amendment to Construction Permit
AC 16-261912(A)
D-Graphics Division

Dear Mr. Turner:

The Department received a verbal request from Mr. Bob Williams on February 7, 1995, to amend the above referenced construction permit due to a proposed rule change that will reflect a new Title V operation permit application due date. If approved, the proposed change in Rule 62-213.420, Florida Administrative Code (F.A.C.), will result in a later due date for submitting the Title V Source operation permit application and the request is acceptable. Therefore, the subject permit is amended as follows:

A. Specific Condition No. 27

From

27. If the facility is a Title V Source and pursuant to Chapter 62-213, F.A.C., an application for a Title V Source operation permit shall be submitted to the Duval County's R&ESD office no later than April 2, 1995.

TO

27. If the facility is a Title V Source pursuant to Chapter 62-213, F.A.C., an application for a Title V Source operation permit shall be submitted to the Duval County's R&ESD office **on a schedule consistent with Rule 62-213.420, F.A.C.**

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

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Mr. Douglas V. Turner
AC 16-261912(A)
Amendment Request
February 7, 1995
Page 2 of 3

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 applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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 the petitioner wants the Department to take with respect to the Department's action or proposed action.

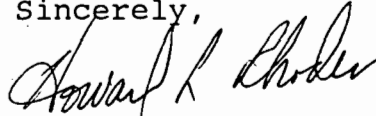
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be

Mr. Douglas V. Turner
AC 16-261912(A)
Amendment Request
February 7, 1995
Page 3 of 3

filed (received) within 14 days of receipt of this amendment 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, F.A.C.

This letter amendment must be attached to the construction permit, No. AC 16-261912(A), and shall become part of the permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/CSL

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 2/9/95 to the listed persons.

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

2/9/95
Date

Florida Department of
Environmental Protection

Memorandum

TO : Howard Rhodes
FROM : Clair Fancy *CF*
DATE : February 7, 1995
SUBJECT: Approval of Construction Permit Amendment
AC 16-261912(A)
D-Graphics Division

Attached for your approval and signature is an amendment to the Jefferson Smurfit Corporation (U.S.) D-Graphics Division's construction permit, which was prepared by the Bureau of Air Regulation. The permit is being amended as a result of a proposed change in Rule 62-213.420, F.A.C., which, if approved, will result in a later due date for submitting the Title V Source operation permit application. This amendment will not cause an increase in annual allowable emission limits or result in any equipment change.

This amendment is recommended for your approval and signature.

CF/CSL

Attachment

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Douglas V. Turner
 Plant Manager
 D-Graphics
 Division of Jefferson Smurfit
 3389 Powers Ave.
 Jacksonville, FL 32231

4a. Article Number
 P 872 563 672

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery

2/1/95

5. Signature (Addressee)
Charles Howell

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Thank you for using Return Receipt Service.

P 872 563 672



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to Mr. Douglas V. Turner	
Street and No. D-Graphics 3389 Powers Ave.	
P.O., State and ZIP Code Jacksonville, FL 32231	
Postage	\$
Certified Fee	
*Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 1-26-95 Permit: AC16-261912	

PS Form 3800, JUNE 1991

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DEP File No. AC 16-261912
Duval County

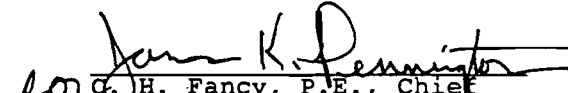
D-Graphics Division
3389 Powers Avenue
Jacksonville, Florida 32231

Enclosed is Construction Permit Number AC 16-261912 for new construction at the existing facility which will allow the permittee to increase production rates and decrease VOC emissions by 35.5 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

for 
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 1/26/95 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) 1/26/95
(Date)

Copies furnished to:
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

Final Determination

Jefferson Smurfit Corporation (U.S.): D-Graphics Division
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

January 25, 1995

Final Determination

D-Graphics

AC 16-261912

The construction permit application package and supplementary material have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Florida Times-Union on December 31, 1994. The Technical Evaluation and Preliminary Determination (TE&PD) were distributed on December 28th and were made available for public inspection at the Department's Northeast District and Bureau of Air Regulation offices and the Duval County's Regulatory & Environmental Services Department (R&ESD) office.

Comments were received from the Jefferson Smurfit Corporation (U.S.) D-Graphics Division (Mr. Doug Turner's letter received January 6, 1995, via the FAX) and the Duval County R&ESD's Air Quality Division (Mr. Richard L. Robinson's letter received January 9, 1995, via the FAX). In addition, the Duval County's R&ESD's Air Quality Division (Mr. Richard L. Robinson) submitted a response providing an additional Specific Condition regarding the substrate loading that was established with the facility and was received January 19, 1995, via the FAX. Finally, the Department's Bureau of Air Regulation requested and received the inlet and outlet temperatures of the catalyst bed and will establish them as a Specific Condition. The Department's responses (R; numbered to correspond to each comment as received) and any changes or new language are as follows and will be in bold print:

I. D-Graphics Division's Comments:

A. **Comment: General** - the request was to delete the word "minimum" from all references to the "capture/transport efficiency of 100%", which was contained in the Intent package.

R: The request is acknowledged, but there is no reissuance of the Intent package unless there is a need to renotice it.

B. **Comment: Specific Condition No. 17** - requested time for debugging Press #4 prior to conducting the initial compliance tests.

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

Specific Condition No. 17.:

FROM: The compliance tests shall be performed at maximum operating conditions for a single press (the No. 4 press and the No. 5 press operating independently of the other) and multiple press operations (the No. 4 press and the No. 5 press

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 oxidizing system shall be demonstrated by these compliance tests.

TO: The initial and subsequent compliance tests shall be performed at maximum operating conditions for a single press (the No. 4 press and the No. 5 press operating independently of the other) and multiple press operations (the No. 4 press and the No. 5 press operating concurrently), for a total of three separate compliance tests. The initial compliance tests on the No. 4 press shall be conducted within 60 days after initial start-up of the press. A 95% total destruction of all VOC emissions delivered to the inlet of the catalytic oxidizing system shall be demonstrated by these compliance tests.

C. Comment: Specific Condition No. 9 - the request was to insert "or is in the process of constructing/installing" after the words "has constructed/installed" and is in regards to the No. 4 press.

R: The request is not necessary because Specific Condition No. 5 addresses the issue and assumes that the No. 4 press is not installed and operational.

D. Comments: Specific Conditions Nos. 10, 11, 12 and 13 - the requests were to rewrite these conditions to allow for varied hours of operation depending on the desired mode of operation and the affected emission unit.

R: Based on discussions with the company and the Duval County's R&ESD, the following will be changed:

Specific Condition No. 10.:

FROM: 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.

TO: After the TES is operational and in compliance, the permittee shall maintain a log book at the facility for each press for recording the date(s) and the actual starting and ending times (i.e., hour, minute, and a.m. or p.m.) of each

Jefferson Smurfit Corporation (U.S.): D-Graphics Division
Final Determination: AC 16-261912
January 25, 1995
Page 3 of 6

press's printing job, from which the actual net "run time" (RT) in hours can be verified and tabulated; and, the following formula shall be used to assess the total actual VOC emissions from the facility:

$$\frac{\#4 \text{ RT} \times 17.5 \text{ lbs/hr} + \#5 \text{ RT} \times 22.5 \text{ lbs/hr} + \#4 \ \& \ \#5 \text{ RT} \times 28.8 \text{ lbs/hr}}{2000}$$

$$\leq 95.0 \text{ Tons}$$

Note: The notation "#4 & #5" is the concurrent operation of the two presses.

The permittee shall notify the Duval County's R&ESD office in writing once the facility achieves 85 tons of VOC emissions; and, the VOC emissions shall be assessed on a weekly basis, thereafter.

II. R&ESD's Comments:

A. **Comment A.:** Requests that the old EPA capture efficiency procedure referenced in the Consent Final Judgement, Appendix A (February 28, 1985), replace the Specific Condition No. 15 citing in Specific Condition No. 7.

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

Specific Condition No. 7.:

FROM: The permittee shall conduct a compliance stack test utilizing the procedures and methods described in Specific Condition No. 15 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.

TO: The permittee shall conduct a compliance stack test utilizing the capture efficiency procedure specified in the July 7, 1980 EPA memorandum entitled "Determination of Capture Efficiency", from James Berry to Doug Cook, and the inlet and outlet concentrations using 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.

B. Comment B.: Requests that annual compliance tests of the destruction efficiency be required after installation of the total enclosure capture system in Specific Condition No. 21.; and, provide the potential of allowing an amendment to the operation permit to permit a change in the testing frequency if continual compliance is demonstrated.

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

Specific Condition No. 21.:

FROM: After the TES is operational and in compliance, a compliance stack test is required once every five years for permit renewal pursuant to Rule 62-297.340(1)(c), F.A.C.; however, when the Department or Duval County's R&ESD office, after investigation, has good reason to believe that any applicable emission standard contained in Rules 62-210, 62-212, 62-213, 62-252, 62-272, 62-273, 62-275, 62-296, or 62-297, F.A.C, or in a permit issued pursuant to those rules is being violated, the owner or operator of the emissions unit(s)/source(s) may be required to conduct "Special Compliance Tests" pursuant to Rule 62-297.340(2), F.A.C., which identify the nature and quantity of pollutant emissions from the emissions unit(s)/source(s) and to provide a report on the results of said tests to the Duval County's R&ESD office.

TO: After the TES is operational and in compliance, compliance tests for the capture and destruction efficiencies are required once every five years for permit renewal pursuant to Rule 62-297.340(1)(c), F.A.C. In addition, annual compliance tests for the destruction efficiency shall be required; and, after two years of demonstrating continuous compliance, the permittee may apply to the Duval County's R&ESD office for a change in the testing frequency through an amendment to the operation permit. However, when the Department or Duval County's R&ESD office, after investigation, has good reason to believe that any applicable emission standard contained in Chapters 62-210, 62-212, 62-213, 62-252, 62-272, 62-273, 62-275, 62-296, or 62-297, F.A.C, or in a permit issued pursuant to those rules is being violated, the owner or operator of the emissions unit(s)/source(s) may be required to conduct "Special Compliance Tests" pursuant to Rule 62-297.340(2), F.A.C., which identify the nature and quantity of pollutant emissions from the emissions unit(s)/source(s) and to provide a report on the results of said tests to the Duval County's R&ESD office.

III. R&ESD's Additional Response:

A. At the request of the Department, the Duval County's R&ESD office met with the facility and established a Specific Condition to address the protocol to quantify the substrate loading of the presses.

R: The Specific Condition is acceptable and the following will be added:

Specific Condition No. 29.: (new)

The amount of the total VOCs applied to the substrate in a 24-hour period shall be determined on a weight basis using the following procedure. At the beginning of the 24-hour period, i.e., 6 a.m., or at the beginning of a new printing job, all of the ink reservoirs to be utilized on the press or presses to be operated shall be filled. All of the ink (coating plus solvent) added to the reservoirs during the 24-hour period, or job, shall be weighed and recorded. At the end of the 24-hour period, i.e., 6 a.m. of the next day, or at the end of a job, the ink reservoirs shall be filled and the weight of ink added shall be recorded. The total amount of ink used from the beginning of the 24-hour period or job to the end of the 24-hour period or job, whichever comes first, shall be the sum of the weight of all ink added to the reservoirs during the period. The weight of VOC contained in the ink shall be determined from the manufacturer's analysis of the coating plus the weight of any solvent added to the coating. The hourly rate of VOC applied to the substrate shall be determined by dividing the total weight of VOC contained in the ink used during the 24-hour period by the number of run hours during the same period. This procedure may be modified at the written request of the permittee with the written approval of Duval County's R&ESD.

IV. Department's Request for the Inlet and Outlet Temperatures of the Catalyst Bed:

A. The Department's Bureau of Air Regulation requested and received the inlet and outlet temperatures of the catalyst bed and will establish the following Specific Condition:

Jefferson Smurfit Corporation (U.S.): D-Graphics Division
Final Determination: AC 16-261912
January 25, 1995
Page 6 of 6

Specific Condition No. 30.: (new)

The inlet temperature of the catalyst bed shall be maintained at a minimum of 550°F. The outlet temperature of the catalyst bed shall be a minimum of 550°F and shall not exceed 850°F (at greater than 850°F, the high temperature controller will shut the catalytic oxidizer system down) during operation of the presses. The inlet and outlet temperatures shall be recorded at all times and the data shall be maintained at the facility for at least five years. All down time and maintenance of the catalytic oxidizer system shall be documented (i.e., date and times) and maintained at the facility.

Attachments to be Incorporated:

- o Mr. Doug Turner's letter received January 6, 1995, via the FAX.
- o Mr. Richard L. Robinson's letter received January 9, 1995, via the FAX.
- o Mr. Richard L. Robinson's response received January 19, 1995, via the FAX.
- o EPA Memorandum titled "Determination of Capture Efficiency" from James Berry to Doug Cook, dated July 7, 1980.

It is recommended that the construction permit, No. AC 16-261912, 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 16-261912
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 units 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 62-297.440, F.A.C., during the initial and subsequent control device efficiency tests, the TES will be considered operational and in compliance. Once the TES is operational and in compliance, the No. 4 and No. 5 may be operated concurrently. Until the TES is operational and in compliance, 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 VOCs 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. 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 VOC emissions capture/transport

PERMITTEE:
D-Graphics

Permit Number: AC 16-261912
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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.
7. Mr. Douglas Turner's letter received January 6, 1995, via the FAX.
8. Mr. Richard L. Robinson's letter received January 9, 1995, via the FAX.
9. Mr. Richard L. Robinson's response received January 19, 1995, via the FAX.
10. EPA Memorandum titled "Determination of Capture Efficiency" from James Berry to Doug Cook, dated July 7, 1980.

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

PERMITTEE:
D-Graphics

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GENERAL CONDITIONS:

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 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.

PERMITTEE:
D-Graphics

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GENERAL CONDITIONS:

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 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)

PERMITTEE:
D-Graphics

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GENERAL CONDITIONS:

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 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. Prior to the TES being operational and in compliance, only the No. 5 press will be allowed to operate. The hours of operation for only the No. 5 press shall not exceed 6088 hours per calendar year

PERMITTEE:
D-Graphics

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SPECIFIC CONDITIONS:

(January 1 through December 31) of run time prior to the TES being operational and in compliance.

3. The maximum allowable volatile organic compounds (VOC's) 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).

4. 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 oxidizing system.

5. In the event that no modification is made to the facility (i.e. the No. 4 press is not installed), then the permittee shall take action to effect Permanent Total Enclosure around the No. 5 press 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.

6. Any changes effected under Specific Condition 5, 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 VOC emissions destruction efficiency of 95%.

7. The permittee shall conduct a compliance stack test utilizing the capture efficiency procedure specified in the July 7, 1980 EPA memorandum entitled "Determination of Capture Efficiency", from James Berry to Doug Cook, and the inlet and outlet concentrations using 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.

8. Operation of the No. 5 press, prior to the TES installation, shall be allowed/occur only with the curtains down and closed so that the press operations are encapsulated, except for parting of the curtains to enter and exit the press area as needed for setup and operating the press.

After the TES is operational and in compliance:

9. The TES will be considered operational and in compliance 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

PERMITTEE:
D-Graphics

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SPECIFIC CONDITIONS:

the requirements given in Procedure T for a Permanent Total Enclosure pursuant to Rule 62-297.440(7)(f), F.A.C., during the initial and subsequent control device efficiency tests.

10. After the TES is operational and in compliance, the permittee shall maintain a log book at the facility for each press for recording the date(s) and the actual starting and ending times (i.e., hour, minute, and a.m. or p.m.) of each press's printing job, from which the actual net "run time" (RT) in hours can be verified and tabulated; and, the following formula shall be used to assess the total actual VOC emissions from the facility:

$$\frac{\#4 \text{ RT} \times 17.5 \text{ lbs/hr} + \#5 \text{ RT} \times 22.5 \text{ lbs/hr} + \#4 \ \& \ \#5 \text{ RT} \times 28.8 \text{ lbs/hr}}{2000}$$

$$\leq 95.0 \text{ Tons}$$

Note: The notation "#4 & #5" is the concurrent operation of the two presses.

The permittee shall notify the Duval County's R&ESD office in writing once the facility achieves 85 tons of VOC emissions; and, the VOC emissions shall be assessed on a weekly basis, thereafter.

11. When both presses are being operated concurrently, the maximum allowable VOC's 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.

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

13. 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.

14. The capture/transport efficiency of the TES shall be 100%, which is established by the Consent Order (Case No.: 94-335) signed on November 14, 1994. The minimum destruction efficiency shall be 95%.

15. The capture/transport efficiency of TES shall be demonstrated by meeting the requirements and procedures specified in Procedure T for a Permanent Total Enclosure pursuant to Rule 62-297.440(7)(f), F.A.C. A pre-compliance test meeting shall be scheduled with the 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.

PERMITTEE:
D-Graphics

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SPECIFIC CONDITIONS:

16. The destruction efficiency of the catalytic oxidizing system 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 = $1 - \text{Penetration}$.

17. The initial and subsequent compliance tests shall be performed at maximum operating conditions for a single press (the No. 4 press and the No. 5 press operating independently of the other) and multiple press operations (the No. 4 press and the No. 5 press operating concurrently), for a total of three separate compliance tests. The initial compliance tests on the No. 4 press shall be conducted within 60 days after initial start-up of the press. A 95% total destruction of all VOC emissions delivered to the inlet of the catalytic oxidizing system shall be demonstrated by these compliance tests.

18. 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's 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. 11, 12 and 13, after the TES is operational and in compliance; 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 office. 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). The final report, which is due by the 15th of January for the quarter October-December, shall include a synopsis of the preceding year and serve as the Annual Operation Report pursuant to Rule 62-210.370(2), F.A.C.

19. 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 No. 5 press and any other presses being installed (the No. 4 press, etc.) 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 the TES operational and in compliance, as described above.

PERMITTEE:
D-Graphics

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SPECIFIC CONDITIONS:

20. Any changes effected under Specific Condition 19, 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 VOC emissions destruction efficiency of 95%.

21. After the TES is operational and in compliance, a compliance stack tests for the capture and destruction efficiencies are required once every five years for permit renewal pursuant to Rule 62-297.340(1)(c), F.A.C. In addition, annual compliance tests for the destruction efficiency shall be required; and, after two years of demonstrating continuous compliance, the permittee may apply to the Duval County's R&ESD office for a change in the testing frequency through an amendment to the operation permit. However, when the Department or Duval County's R&ESD office, after investigation, has good reason to believe that any applicable emission standard contained in Chapters 62-210, 62-212, 62-213, 62-252, 62-272, 62-273, 62-275, 62-296, or 62-297, F.A.C, or in a permit issued pursuant to those rules is being violated, the owner or operator of the emissions unit(s)/source(s) may be required to conduct "Special Compliance Tests" pursuant to Rule 62-297.340(2), F.A.C., which identify the nature and quantity of pollutant emissions from the emissions unit(s)/source(s) and to provide a report on the results of said tests to the Duval County's R&ESD office.

General:

22. The Duval County's R&ESD office shall be notified, in writing and at least 15 days in advance, of any EPA Method 25A compliance test pursuant to Rule 62-297.340(1), F.A.C.

23. Testing of emissions shall be conducted with the emission unit(s)/source(s) (the No. 4 press 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(s)/source(s) may be tested at less than 90 percent of the maximum operating rate allowed by the permit. In this case, subsequent emission unit(s)/source(s) operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit(s)/source(s) 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.

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

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SPECIFIC CONDITIONS:

25. 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 capture/transport efficiency from 80% to 100%; these offsets will be available only after the TES is operational and in compliance.

26. Pursuant to Rule 62-4.080, 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 date of the permit.

27. If the facility is a Title V Source and pursuant to Chapter 62-213, F.A.C., an application for a Title V Source operation permit shall be submitted to the Duval County's R&ESD office no later than April 2, 1995.

28. If the facility is a non-Title V Source and 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 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, fee, certification that construction was completed while noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit.

29. The amount of the total VOCs applied to the substrate in a 24-hour period shall be determined on a weight basis using the following procedure. At the beginning of the 24-hour period, i.e., 6 a.m., or at the beginning of a new printing job, all of the ink reservoirs to be utilized on the press or presses to be operated shall be filled. All of the ink (coating plus solvent) added to the reservoirs during the 24-hour period, or job, shall be weighed and recorded. At the end of the 24-hour period, i.e., 6 a.m. of the next day, or at the end of a job, the ink reservoirs shall be filled and the weight of ink added shall be recorded. The total amount of ink used from the beginning of the 24-hour period or job to the end of the 24-hour period or job, whichever comes first, shall be the sum of the weight of all ink added to the reservoirs during the period. The weight of VOC contained in the ink shall be determined from the manufacturer's analysis of the coating plus the weight of any solvent added to the coating. The hourly rate of VOC applied to the substrate shall be determined by dividing the total

PERMITTEE:
D-Graphics

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SPECIFIC CONDITIONS:

weight of VOC contained in the ink used during the 24-hour period by the number of run hours during the same period. This procedure may be modified at the written request of the permittee with the written approval of Duval County's R&ESD.

30. The inlet temperature of the catalyst bed shall be maintained at a minimum of 550°F. The outlet temperature of the catalyst bed shall be a minimum of 550°F and shall not exceed 850°F (at greater than 850°F, the high temperature controller will shut the catalytic oxidizer system down) during operation of the presses. The inlet and outlet temperatures shall be recorded at all times and the data shall be maintained at the facility for at least five years. All down time and maintenance of the catalytic oxidizer system shall be documented (i.e., date and times) and maintained at the facility.

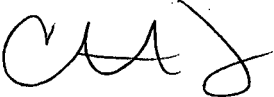
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Howard L. Rhodes, Director
Division of Air Resources
Management

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes
FROM: Clair Fancy 
DATE: January 25, 1995
SUBJECT: Approval of Construction Permit
AC 16-261912
D-Graphics Division

Attached for your approval and signature is a construction permit prepared by the Bureau of Air Regulation for the above referenced company. This permit will allow D-Graphics to operate the existing No. 5 press, construct/install a No. 4 press adjacent to the No. 5 press, and to construct a total enclosure system (TES) around both presses. The TES is required to capture/transport 100% of the volatile organic compound (VOC) emissions from within the enclosure to a catalytic oxidizing system, which will have a minimum destruction efficiency of 95%. The new capture/transport and existing destruction efficiencies were established by a Consent Order and a determination of Lowest Achievable Emission Rate (LAER), respectively. The No. 5 press may be operated until the TES is operational and in compliance, at which time both presses may be operated concurrently or independently. Once the TES is operational and in compliance, the maximum allowable VOC emission limit for the facility will be decreased from 130.5 to 95.0 tons per year (assuming that the No. 4 press is installed; and, will be even lower if the No. 4 press is not installed). This reduction will cause the facility to be a minor facility of VOC emissions. The existing facility is located in Jacksonville, Duval County, Florida. This permit will not cause an exceedance of ambient air quality standards.

Comments were received during the public notice period. The changes made had no significant effect on the Department's Intent to Issue.

I recommend your approval and signature.

CHF/CSL/rbm

Attachments

BEST AVAILABLE COPY

SERVICES DEPARTMENT

FAX COVER SHEET

AIR QUALITY DIVISION

421 West Church Street, Suite 412
Jacksonville, Florida 32202
(904)630-3484 (OFFICE)
(904)630-3638 (FAX)

DATE: 1/9/95 TIME: 1:17P

TO: Brown, M. D. Hill FAX #: 904-272-6977
DEP

MESSAGE: _____

FROM: Robert Robinson

NUMBER OF PAGES FAXED (including cover): _____

PLEASE CALL (904)630-3484 IF YOU DO NOT RECEIVE ALL THE PAGES OF THIS FAX OR IF TRANSMISSION IS UNCLEAR. OUR FAX NUMBER IS (904)630-3638.

REGULATORY & ENVIRONMENTAL
SERVICES DEPARTMENT
Air Quality Division



January 5, 1995

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

Area Code 904/630-3484

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

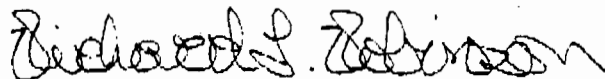
- B. **Specific Condition No. 21.** AQD recommends that the test frequency for the future operating permit or Title V permit not be specified in the construction permit. Other than the original compliance test requirement the testing frequency is usually established by the permitting authority writing 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
File 1120-A



**JEFFERSON SMURFIT CORPORATION
D-GRAPHICS DIVISION**

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

January 5, 1995

RECEIVED

JAN 06 1995

Bureau of
Air Regulation
Air Regulation

Mr. Clair Fancy, P.E.
Chief, Bureau of Air Regulations
Division of Air Resources Management
Department of Environmental Protection
111 South Magnolia Park Courtyard
Tallahassee, Florida 32301

RE: Notice of Intent to Issue -Construction Permit # AC 16-261912

Dear Mr. Fancy:

Attached is the original copy of the Legal Notice published in the Florida Times-Union on December 31, 1994 regarding our Notice of Intent to Issue for Construction Permit # AC 16-261912.

Thank you in for your attention to this issue. If you have any questions or need further information, please don't hesitate to contact me at 904-733-4020.

Sincerely,

Douglas Turner

Douglas Turner
Plant Manager

cc: C. Fagan
S. Hall, DCR/ESD
C. Kinta, NED
J. Harpley, EPA
J. Bunch, NPS
J. Braswell, OGC

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 volatile organic compound (VOC) emissions for the No. 5 press is 130.5 tons per year (TPY) until the TES is operational and in compliance, at which time the maximum total allowable VOC emissions from the facility will be 95.0 TPY. When the TES is operational and in compliance the No. 4 press and the No. 5 press may be 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 destruction efficiency of 95%. After the TES is operational and in compliance, 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.

FLORIDA PUBLISHING COMPANY
Publisher
JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared _____

Robin Rady who on oath says that he is

National Adv Rep of The Florida Times-Union,

a daily newspaper published at Jacksonville in Duval County, Florida; that the attached copy of advertisement, being a Legal Notice

in the matter of Notice of Intent to Issue

in the _____ Court,

was published in THE FLORIDA TIMES-UNION in the issues of _____
December 31, 1994

Affiant further says that the said The Florida Times-Union is a newspaper published at Jacksonville, in said Duval County, Florida, and that the said newspaper has heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceeding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me
this 03 day of
January A.D. 1995

Vera Janie Likens
Notary Public,
State of Florida at Large.

Robin Rady

My Commission Expires VERA JANIE LIKENS
MY COMMISSION # CC 222556 EXPIRES
June 1, 1996
DA 445 BONDED THRU TROY FAIR INSURANCE, INC.



JEFFERSON SMURFIT CORPORATION
D-GRAPHICS DIVISION

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

December 30, 1994

RECEIVED
JAN 03 1995

Bureau of
Air Regulation

Mr. Clair Fancy, P.E.
Chief, Bureau of Air Regulations
Division of Air Resources Management
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Notice of Consent Order

Dear Mr. Fancy:

Attached is the original copy of the Legal Notice published in the Florida Times-Union on December 10, 1994 regarding our Notice of Consent Order.

Thank you for your attention to this critical issue. If you have any questions or need further information, please don't hesitate to contact me at 904-733-4020.

Sincerely,

Douglas Turner
Plant Manager

cc: J. Brumwell



FLORIDA PUBLISHING COMPANY
Publisher
 JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
 COUNTY OF DUVAL }

Before the undersigned authority personally appeared _____

Coleman Kane

who on oath says that he is

Contract Adv Rep

of The Florida Times-Union,

a daily newspaper published at Jacksonville in Duval County, Florida; that the
 attached copy of advertisement, being a Legal Notice

in the matter of Notice of Consent Order

in the _____ Court,

was published in THE FLORIDA TIMES-UNION in the issues of _____

December 10, 1994

Affiant further says that the said The Florida Times-Union is a newspaper published at Jacksonville, in said Duval County, Florida, and that the said newspaper has heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceeding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me
 this 12 day of

December A.D. 1994.

Vera Janie Likens
 Notary Public,
 State of Florida at Large.

Coleman Kane

My Commission Expires **VERA JANIE LIKENS**
 MY COMMISSION # CC 222556 EXPIRES
 June 1, 1996
 DA 444 BONDED THRU TROY FAIN INSURANCE, INC.

State of Florida
 Department of Environmental Protection
 Notice of Consent Order

The Department of Environmental Protection gives notice of agency action of entering into a Consent Order with Jefferson Smurfit Corporation, (U.S.), d/b/a/ D-Graphics (Respondent) pursuant to Rule 62-103.110(3), Florida Administrative Code. The Consent Order addresses violations of the Department's rules, permit conditions and variance that are alleged to have occurred during Respondent's operation of its package rotogravure printing press. The Consent Order describes the new requirements that will be imposed upon Respondent to ensure that future violations of the Department's regulations do not occur. The Consent Order also describe the other actions the Department will take to address its concerns about the alleged violations. The Consent Order is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Protection, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399 and the Department's Northeast District Office, Suite 200 B, 7825 Baymeadows Way, Jacksonville, Florida 32256-7577.

Persons whose substantial interests are affected by this Consent Order have a right to petition for an administrative hearing on the Consent Order. The Petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 within 21 days of receipt of this notice. Failure to file a petition within 21 days constitutes a waiver of any right such person has to an administrative hearing pursuant to Section 120.57, F.S.

The petition shall contain the following information: (a) The name, address, and telephone number of each petitioner, the Department's identification number for the Consent Order and the county in which the subject matter or activity is located; (b) A statement of how and when each petitioner received notice of the Consent Order; (c) A statement of how each petitioner's substantial interests are affected by the Consent Order; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of the material facts disputed by petitioner, if any; (f) A statement of the material facts which petitioner contends warrant reversal or modification of the Consent Order; (g) A statement of which rules or statutes petitioner contends require reversal or modification of the Consent Order; (h) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Consent Order.

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 subject Consent Order have the right to petition to become a party to the proceedings. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of the 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 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 60Q-2.01 F.A.C. Appeals to JEPB Orders are governed by Section 360.406 Ord. Code and JEPB Rule 1.



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,

A handwritten signature in black ink, appearing to read "C. H. Fancy".

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

CHF/CSL/cl

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, 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 the initial and subsequent control device efficiency tests, the TES will be operational and in compliance. Until the TES is operational and in compliance, 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, both presses may be operated concurrently at the facility and 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 when the TES is operational and in compliance. 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;

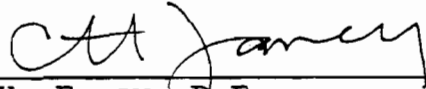
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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 12-28-94.

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

12-28-94
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 volatile organic compound (VOC) emissions for the No. 5 press is 130.5 tons per year (TPY) until the TES is operational and in compliance, at which time the maximum total allowable VOC emissions from the facility will be 95.0 TPY. When the TES is operational and in compliance the No. 4 press and the No. 5 press may be 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, 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 Protection
Bureau of Air Regulation
111 South Magnolia Park Courtyard
Tallahassee, Florida 32301

Department of Environmental Protection
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 62-297.440(7)(f), Florida Administrative Code (F.A.C.), during the initial and subsequent control device efficiency tests, the TES will be operational and in compliance. Until the TES is operational and in compliance, 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). Once the permittee has demonstrated that the TES is operating in compliance, both presses may be operated concurrently and 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 and in compliance. The minimum capture/transport and destruction efficiencies have been established by a Consent Order and a determination of Lowest Achievable Emission Rate (LAER).

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 and in compliance, 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 PM₁₀ (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, 1994, and clerked December 6, 1994), which require the TES 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 62-297.440, 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 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 operational and in compliance, 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 units 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 62-297.440, F.A.C., during the initial and subsequent control device efficiency tests, the TES will be considered operational and in compliance. Once the TES is operational and in compliance, the No. 4 and No. 5 may be operated concurrently. Until the TES is operational and in compliance, 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's 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
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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. Prior to the TES being operational and in compliance, only the No. 5 press will be allowed to operate. The hours of operation for only the No. 5 press shall not exceed 6088 hours per calendar year (January 1 through December 31) of run time prior to the TES being operational and in compliance.

3. The maximum allowable volatile organic compounds (VOC's) 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).

4. 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%

PERMITTEE:
D-Graphics

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

SPECIFIC CONDITIONS:

destruction of all VOC emissions delivered to the inlet of the catalytic oxidizing system.

5. In the event that no modification is made to the facility (i.e. the No. 4 press is not installed), then the permittee shall take action to effect Permanent Total Enclosure around the No. 5 press 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.

6. Any changes effected under Specific Condition 5, 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 VOC emissions destruction efficiency of 95%.

7. The permittee shall conduct a compliance stack test utilizing the procedures and methods described in Specific Condition No. 15 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.

8. Operation of the No. 5 press, prior to the TES installation, shall be allowed/occur only with the curtains down and closed so that the press operations are encapsulated, except for parting of the curtains to enter and exit the press area as needed for setup and operating the press.

After the TES is operational and in compliance:

9. The TES will be considered operational and in compliance 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 62-297.440(7)(f), F.A.C., during the initial and subsequent control device efficiency tests.

10. 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.

11. When both presses are being operated concurrently, the maximum allowable VOC's 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.

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

PERMITTEE:
D-Graphics

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Expiration Date: January 1, 1997

SPECIFIC CONDITIONS:

13. 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.

14. The capture/transport efficiency of the TES shall be 100%, which is established by the Consent Order (Case No.: 94-335) signed on November 14, 1994. The minimum destruction efficiency shall be 95%.

15. The capture/transport efficiency of TES shall be demonstrated by meeting the requirements and procedures specified in Procedure T for a Permanent Total Enclosure pursuant to Rule 62-297.440(7)(f), F.A.C. A pre-compliance test meeting shall be scheduled with the 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.

16. The destruction efficiency of the catalytic oxidizing system 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 = $1 - \text{Penetration}$.

17. The compliance tests shall be performed at maximum operating conditions for a single press (the No. 4 press and the No. 5 press operating independently of the other) and multiple press operations (the No. 4 press and the No. 5 press 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 oxidizing system shall be demonstrated by these compliance tests.

18. 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's 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. 11, 12 and 13, after the TES is operational and in compliance; 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 office. 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). The final report, which is due by the 15th of January for the quarter October-December, shall include a synopsis of the preceding year and serve as the Annual Operation Report pursuant to Rule 62-210.370(2), F.A.C.

PERMITTEE:
D-Graphics

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

SPECIFIC CONDITIONS:

19. 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 No. 5 press and any other presses being installed (the No. 4 press, etc.) 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 the TES operational and in compliance, as described above.

20. Any changes effected under Specific Condition 19, 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 VOC emissions destruction efficiency of 95%.

21. After the TES is operational and in compliance, a compliance stack test is required once every five years for permit renewal pursuant to Rule 62-297.340(1)(c), F.A.C.; however, when the Department or Duval County's R&ESD office, after investigation, has good reason to believe that any applicable emission standard contained in Rules 62-210, 62-212, 62-213, 62-252, 62-272, 62-273, 62-275, 62-296, or 62-297, F.A.C, or in a permit issued pursuant to those rules is being violated, the owner or operator of the emissions unit(s)/source(s) may be required to conduct "Special Compliance Tests" pursuant to Rule 62-297.340(2), F.A.C., which identify the nature and quantity of pollutant emissions from the emissions unit(s)/ source(s) and to provide a report on the results of said tests to the Duval County's R&ESD office.

General:

22. The Duval County's R&ESD office shall be notified, in writing and at least 15 days in advance, of any EPA Method 25A compliance test pursuant to Rule 62-297.340(1), F.A.C.

23. Testing of emissions shall be conducted with the emission unit(s)/source(s) (the No. 4 press 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(s)/source(s) may be tested at less than 90 percent of the maximum operating rate allowed by the permit. In this case, subsequent emission unit(s)/source(s) operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit(s)/source(s) is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the

PERMITTEE:
D-Graphics

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

SPECIFIC CONDITIONS:

purposes of additional compliance testing to regain the permitted capacity in the permit.

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

25. 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 capture/transport efficiency from 80% to 100%; these offsets will be available only after the TES is operational and in compliance.

26. Pursuant to Rule 62-4.080, 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 date of the permit.

27. If the facility is a Title V Source and pursuant to Chapter 62-213, F.A.C., an application for a Title V Source operation permit shall be submitted to the Duval County's R&ESD office no later than April 2, 1995.

28. If the facility is a non-Title V Source and 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 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, fee, certification that construction was completed while 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



JEFFERSON SMURFIT CORPORATION
D-GRAPHICS DIVISION

VIA FACSIMILE (1 page)

December 8, 1994

3388 POWERS AVENUE
JACKSONVILLE, FL 32207
TELEPHONE: 904/733-4020
FAX: 904/733-4381

RECEIVED

DEC 8 1994

Bureau of
Air Regulation

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

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 lbs. VOC's to temperature rise. There 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. Dinehart
Division Engineer
Consumer Packaging Division
Jefferson Smurfit Corporation



TELEFAX TRANSMITTAL LETTER

D-GRAPHICS

DIVISION OF
JEFFERSON SMURFIT CORP.

3389 Powers Avenue
Jacksonville, Florida 32207

TELEFAX NUMBER: 904-733-4381
TELEPHONE NUMBER: 904 733 4020

FROM: Doug Turner

TO: Charles Logan 904-922-6979

1 PAGES ARE BEING TRANSMITTED EXCLUDING COVER SHEET

MESSAGE:

PLEASE COPY BRUCE MITCHELL

THANKS

Multiple horizontal lines for additional message content, currently blank.



**JEFFERSON SMURFIT CORPORATION
D-GRAPHICS DIVISION**

December 8, 1994

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

Mr. Ernest Frey, Director
District Management
Northeast District
Department of Environmental Protection
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7577

Re: D-Graphics Press #2 & Press #4 Construction Permits

Dear Mr. Frey:

Pursuant to Specific Condition #10 in Permit Number AC-259725 issued to D-Graphics on December 5th, we surrender the construction permits for press #2 for 426.06 tons of VOC's annually and press #4 for 195.1 tons of VOC's annually. The permit numbers are AC 16-105518 and AC 16-093347 respectively. We reserve any offsets or creditable emission reductions available from these sources.

I have enclosed a copy of the press #4 permit; no original was found in our files. I have not been able to find a copy of the press #2 construction permit; although I do have the original of the press #2 operating permit. As you are aware, press #2 was actually remove from our facility in 1990.

If you have any questions please call me at 733-4020. Thank you for your attention in this matter.

Sincerely,

Douglas V. Turner
Plant Manager
D-Graphics

Enclosure

cc: Mr. Terry Cole, Attorney (w/o enclosure)



**JEFFERSON SMURFIT CORPORATION
D-GRAPHICS DIVISION**

December 8, 1994

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

Mr. Ernest Frey, Director
District Management
Northeast District
Department of Environmental Protection
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7577

Re: D-Graphics Press #2 & Press #4 Construction Permits

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I have enclosed a copy of the press #4 permit; no original was found in our files. I have not been able to find a copy of the press #2 construction permit; although I do have the original of the press #2 operating permit. As you are aware, press #2 was actually remove from our facility in 1990.

If you have any questions please call me at 733-4020. Thank you for your attention in this matter.

Sincerely,

Douglas V. Turner
Plant Manager
D-Graphics

Enclosure

cc: Mr. Terry Cole, Attorney (w/o enclosure)



JEFFERSON SMURFIT CORPORATION
D-Graphics Division

December 7, 1994

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

Mr. Charles Logan
Bureau of Air Management
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

DEC 8 1994

Bureau of
Air Regulation

Re: Press #4 Relocation Revised Application

Dear Charles:

Enclosed is one complete copy of our "Application To Operate/Construct Air Pollution Sources" for the D-Graphics Press #4 relocation project and three copies without the D size drawings. Please remove the D size drawings from the old applications I left with you on Monday, Dec. 5th and add them the these three applications. The order of the pages, attachments and drawings in the enclosed original can be duplicated for the other three. Note that there are two added pages 4 and 5 for this application. Please discard the copies of the application dated Dec. 2nd.

If you have any questions regarding the application, please call Doug Turner, the D-Graphics Plant Manager at (904) 733-4020 or Mr. Jim Manning, our Engineering Consultant at (904) 269-7012.

Sincerely,

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

Enclosures

cc: Jim Manning, P.E.





**JEFFERSON SMURFIT CORPORATION
D-Graphics Division**

December 6, 1994

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

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Management
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Press #4 Relocation Project With Total Enclosure

Dear Mr. Fancy:

Enclosed are four copies of our "Application To Operate/Construct Air Pollution Sources" for the D-Graphics Press #4 relocation project. This includes some changes and additions to the application as a result of a December 5th meeting with John Brown, Bruce Mitchell, and Charles Logan in your Tallahassee offices.

If you have any questions regarding this issue, please call me at 733-4020; Bob Dinehart, our Division Engineer at 708-260-3574; or Mr. Jim Manning, our Engineering Consultant at 269-7012.

Sincerely,

Douglas V. Turner
Plant Manager
D-Graphics

Enclosures

cc: Jim Manning, P.E.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form # _____
Form Title _____
Effective Date _____
DER Application No. _____ (Filed in by DER)

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Rotogravure Printing Press [] New [X] Existing

APPLICATION TYPE: [X] Construction [] Operation [X] Modification

COMPANY NAME: D-Graphics, Div of Jefferson Smurfit Corp. COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired)

SOURCE LOCATION: Street 3389 Powers Avenue City Jacksonville

UTM: East _____ North _____

Latitude 30 ° 15 ' 55 "N Longitude 81 ° 37 ' 18 "W

APPLICANT NAME AND TITLE: Douglas V. Turner, Plant Manager

APPLICANT ADDRESS: 3389 Powers Avenue, Jacksonville, Florida 32207

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of D-Graphics-Div of Jefferson Smurfit Corp.

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Douglas V. Turner
Douglas V. Turner, Plant Manager
Name and Title (Please Type)

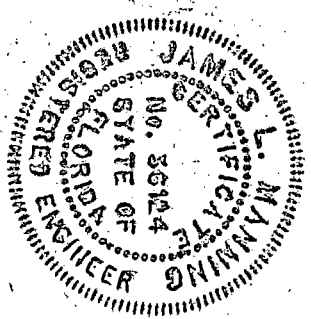
Date: 12/6/94 Telephone No. 904-733-4020

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

1 See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed James L. Manning
James L. Manning

Name (Please Type)

Company Name (Please Type)

5077 Toproyal Lane, Jacksonville, Fl. 32277

Mailing Address (Please Type)

Florida Registration No. 36124 Date: 12/6/94 Telephone No. 904-744-7005

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

To relocate Press #4 adjacent to Press #5 including foundation enhancement and operational controls. Construct a total enclosure that captures 100% of VOC emissions from the operation of Press #4 & #5 and evacuates to the existing catalytic oxidizer system.

The press and control system will comply with all applicable regulations. (See Attachment A-Drawing)

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction January 15, 1995 Completion of Construction December 31, 1995

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

The cost of reconfiguring the collection system duct work and construction of the total enclosure to include the supply air and control system is approximately \$500,000. Final cost will be determined after completion of detailed engineering. No changes to the existing oxidizer is required.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Press #4: AC16-093347 issued 2/12/85; expired 3/31/86

Press #5: AC16-259725 issued 12/5/94; expires 5/15/95

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52; if power plant, hrs/yr _____; if seasonal, describe: Normal operation of the equipment is 3 shifts, 5 to 7 days per week, 52 weeks per year, with projected 20% downtime for cylinder changes, re-webbing, maintenance, clean up, etc.

F. If this is a new source or major modification, answer the following questions. (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? Yes
 - a. If yes, has "offset" been applied? No
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? Yes
 - c. If yes, list non-attainment pollutants. OZONE
2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. _____
3. Does the State "Prevention of Significant Deterioration" (PSD) requirement apply to this source? If yes, see Sections VI and VII. _____
4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? _____
5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? _____

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? _____
- a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Paper	None			
Coatings	VOC	54 (Avg)	264.5	Presses 4 & 5
Solvents	VOC	100	310.5	Presses 4 & 5

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): _____
- Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
VOC	28.8	95			575	1900	Press4&5
(see Attachment B for calculations)							

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

100% capture and 95% destruction efficiency required by Consent Order dated November 14, 1994 (See Attachment C)

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Paper	None			
Coatings	VOC	54 (Avg)	161	Press 4
Solvents	VOC	100	189	Press 4
Total Press #4			350	
			(See Attachment B)	

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): _____
2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual I/yr			lbs/yr	I/yr	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Paper	None			
Coatings	VOC	54 (Avg)	207	Press 5
Solvents	VOC	100	243	Press #5
Total Press #5			450	
		(See Attachment B)		

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input.)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Dentrol Enclosures	VOC	100% Capture		Manufacturers Warranty
Dentrol Oxidizer	VOC	95% Destruction		Manufacturers Warranty
			(See Attachment D)	

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas			
Press #4 & #5 Combine)	0.0067	0.0092	11.2 (At start-up)
Control Device	0.0027	0.0045	6.0

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: .00017% Percent Ash: -0-

Density: .05 lb/cf ~~lbs/gal~~ Typical Percent Nitrogen: 0.6%

Heat Capacity: 1042 BTU/CF BTU/lb BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 39 ft. Stack Diameter: 4.17 ft.
 Gas Flow Rate: 30.868 ACFM 20,000 DSCFM Gas Exit Temperature: 358 °F.
 Water Vapor Content: Varies % Velocity: 37.73 FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____
 Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____
 Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____
 Manufacturer _____
 Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____
 Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas			
Press #4	0.0031	0.0042	5.15

*Units: Natural Gas--MMcf/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas			
Press #5	.0036	.0050	6.05

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:

2. Operating Principles:

3. Efficiency:*

4. Capital Costs:

*Explain method of determining

- 5. Useful Life:
- 7. Energy:
- 9. Emissions:

- 6. Operating Costs:
- 8. Maintenance Cost:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.
- b. Diameter: ft.
- c. Flow Rate: ACFM
- d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [] Yes [] No

b. Was instrumentation calibrated in accordance with Department procedures?
[] Yes [] No [] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

2. Surface data obtained from (location) _____

3. Upper air (mixing height) data obtained from (location) _____

4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ²	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

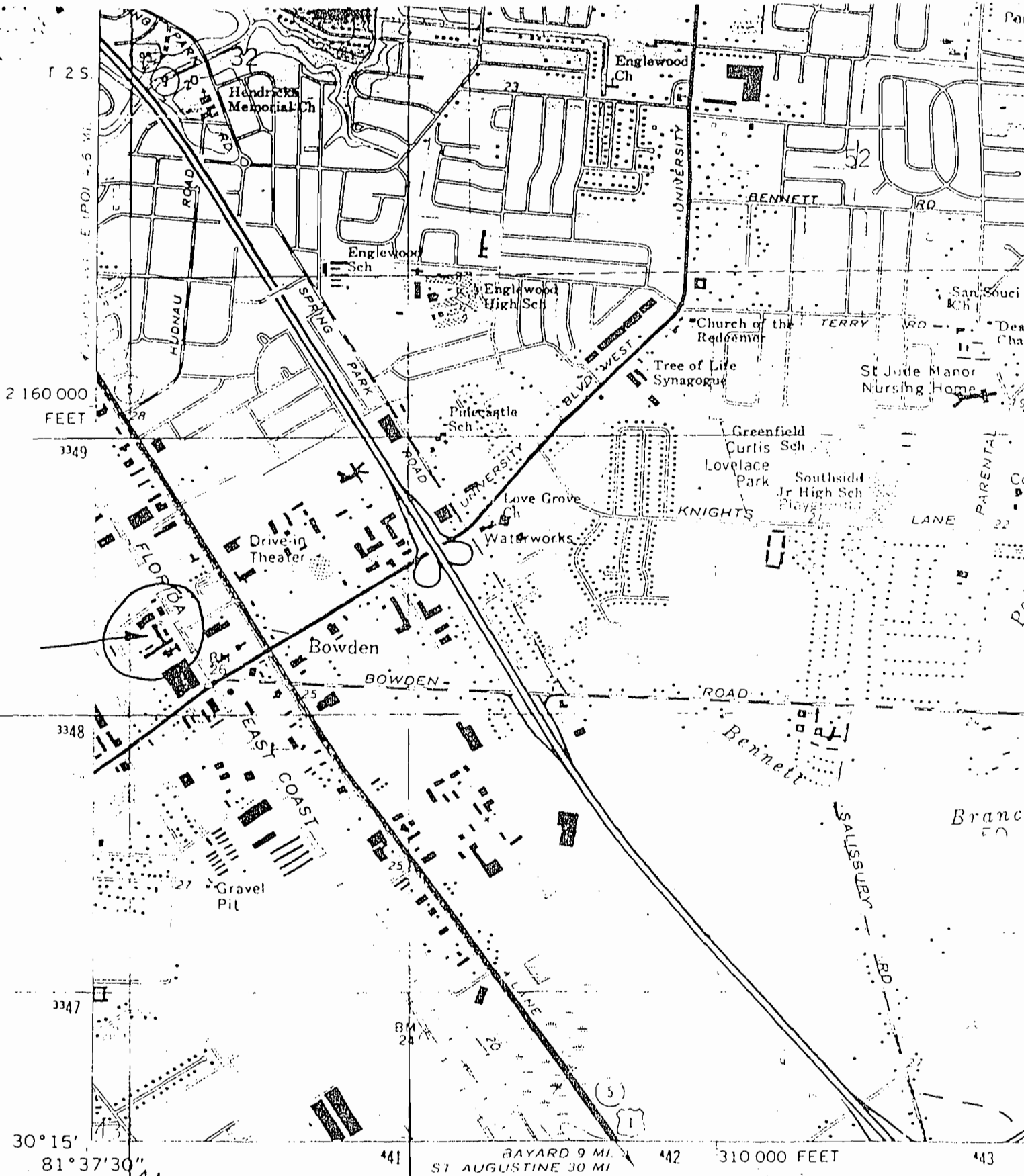
ATTACHMENT A
Drawings

#1. Plot Plan Showing Location Of Facility (8 1/2" X 11")

#2. 1st Enclosure Exhaust Schematic (36" X 24" blueprint)

#3 2nd Enclosure Exhaust Schematic (36" X 24" blueprint)

#4. Preliminary Enclosure Layout (36" X 24" blueprint)



Mapped, edited, and published by the Geological Survey
Control by USGS, NOS/NOAA, and Florida Geodetic Survey

Planimetry compiled from NOS charts 1933. Topography from
planetable surveys 1948. Revised by photogrammetric methods
from aerial photographs taken 1963. Field checked 1963

Selected hydrographic data compiled from NOS chart 577 (1963)
This information is not intended for navigational purposes

Polyconic projection. 10,000-foot grid ticks based on Florida
coordinate system, east zone. 1000-meter Universal Transverse

Attahnd A #1

ARLINGTON
QUADRANGLE

2 1/2" = 44 MILS

CO (GEORGE PARK) 14 11 NW

ATTACHMENT B
SECTION III C: Airborne Contaminants Emitted

Section III C: The value of **95 tons** of VOC's per year proposed as the maximum actual emissions is based on discussions at a meeting with the DEP and RESD on November 22, 1994; a second meeting between Howard Rhodes and Bruce Mitchell of DEP and Bob Williams, of JSC, representing D-Graphics, on December 1, 1994; and a third meeting between John Brown, Bruce Mitchell, and Charles Logan of DEP and Bob Dinehart and Bob Williams of JSC, representing D-Graphics, on December 5, 1994.

The VOC capture rate of 100% and the VOC destruction efficiency of 95% are required by the Consent Order, dated November 14, 1994, and is guaranteed by the designer and supplier of the enclosure and the catalytic oxidizer, Demtrol Systems Division of Hartland, WI.

Annual emission rate: **95 tons of VOC's per year**

Number of operating hours: **6600 hours per year for each press**

Maximum lbs./hr. emissions: $95 \text{ tons} \times 2000 \text{ lbs./ton} / 6600 \text{ hrs.} =$
28.8 lbs./hr.

Potential emission: $28.8 \text{ lbs./hr.} / 1/95\% \text{ destruction efficiency} =$
575 lbs./hr loading

Maximum emissions for each press is based on 40% additional capacity: $575 \text{ lbs./hr.} \times 1.40 = 800 \text{ lbs./hr.}$

One press may run at a higher capacity as long as the total lbs./hr. applied does not total more than 575 lbs./hr.

800 lbs./hr. is distributed:

350#/hr. on press #4

450#/hr. on press #5

31. The Respondent shall, within 10 days of issuance of Permit AC16-259725, surrender the Air Construction permit, AC16-105518 for Press No. 2. Respondent reserves any creditable emission reductions or offsets available from Press No. 2.

32. The Respondent shall, with any future modification as defined by F.A.C. Rule 62-212.200(46), configure the existing Press No. 5 and any other presses being installed in a total enclosure intended to achieve substantially 100% capture of all VOC emissions. No operation of the modified system shall be allowed in the new configuration without a design intended for substantially 100% capture as described above. Respondent reserves any creditable emission reductions or offsets available.


33. In the event that no further modifications are made to the Facility, the Respondent shall take action intended to achieve substantially 100% capture of all VOC emissions, not later than June 30, 1996. Respondent reserves any creditable emission reductions or offsets available.

34. Within 90 days of execution of this Consent Order, Respondent shall submit to RESD complete engineering drawings of the present capture, control (i.e., incinerator) airhandling and electrical systems.

35. Within 90 days of execution of this Consent Order, Respondent shall undertake a study of technology to reduce or eliminate VOC's

Attachment D
Section III D: Control Devices
Basis for Efficiency

651 North Avenue
Hartland, WI 53029
(414) 367-7548
FAX (414) 367-0831


Demtrol Systems Division
Diversified Emission Control

December 1, 1994

D-GRAPHICS
Division of Dinagraphics, Inc.
3389 Powers Avenue
Jacksonville, FL 32207
Attn: Mr. Doug Turner/Plant Manager

Dear Mr. Turner,

The purpose of this letter is identify our responsibility for the total enclosure project, which also is to encompass certain aspects on the relocation of press #4 along side of press #5.

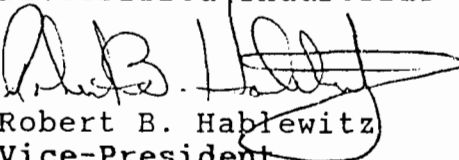
DEMTROL SYSTEMS DIVISION will guarantee that the total enclosure and capture system we design and install will meet the federal guidelines of "PROCEDURE T" and thus capture 100% of the VOC's from both gravure presses identified as #4 and #5. In addition to the above, all the captured VOC's from the enclosure will be destroyed by the existing catalytic oxidizer system by an amount at not less then 95% based on EPA Method 25A, on a methane free basis.

We are prepared to begin detailed engineering on this project as soon as you can receive air permit approval from both local and state agencies. If desired, once engineering is completed we would be willing to meet with, and discuss, or provide these drawings and additional information to the appropriate agency personnel.

Should you require any further information, please do not hesitate to call on us.

Thanking you in advance for your time and consideration.

Sincerely,
DEMTROL SYSTEMS DIVISION of
Diversified Industrial Products, Inc.


Robert B. Hablewitz
Vice-President
RBH/sj

D-GRAPHICS

Best Available Copy

DIVISION OF
JEFFERSON SMURFIT CORP.

3389 Powers Avenue
Jacksonville, Florida 32207


TELEFAX NUMBER: 904-733-4381

TELEPHONE NUMBER: 904 733 4020

FROM: Bob Dinchart, D-graphics

TO: Charles Logan FDEP - 904-922-6979

3 PAGES ARE BEING TRANSMITTED EXCLUDING COVER SHEET

MESSAGE: 

See attached per our
conversation yesterday

Multiple horizontal lines for additional message content.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form No.	_____
Form Title	_____
Effective Date	_____
DER Application No.	_____

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Rotogravure Printing Press New¹ Existing¹

APPLICATION TYPE: Construction Operation Modification

COMPANY NAME: D-Graphics, Div of Jefferson Smurfit Corp. COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired)

SOURCE LOCATION: Street 3389 Powers Avenue City Jacksonville

UTM: East _____ North _____

Latitude 30 ° 15 ' 55 "N Longitude 81 ° 37 ' 18 "W

APPLICANT NAME AND TITLE: Douglas V. Turner, Plant Manager

APPLICANT ADDRESS: 3389 Powers Avenue, Jacksonville, Florida 32207

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of D-Graphics-Div of Jefferson Smurfit Corp.

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Douglas V. Turner
Douglas V. Turner, Plant Manager
Name and title (Please type)

Date: 12/6/94 Telephone No. 904-733-4020

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed _____

James L. Manning

Name (Please Type)

Company Name (Please Type)

5077 Toproyal Lane, Jacksonville, Fl. 32277

Mailing Address (Please Type)

Florida Registration No. 36124

Date: _____

Telephone No. 904-744-7005

SECTION II: GENERAL PROJECT INFORMATION

Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

To relocate Press #4 adjacent to Press #5 including foundation enhancement and operational controls. Construct a total enclosure that captures 100% of VOC emissions from the operation of Press #4 & #5 and evacuates to the existing catalytic oxidizer system.

The press and control system will comply with all applicable regulations. (See Attachment A-Drawing)

Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction January 15, 1995 Completion of Construction December 31, 1995

Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

The cost of reconfiguring the collection system duct work and construction of the total enclosure to include the supply air and control system is approximately \$500,000. Final cost will be determined after completion of detailed engineering. No changes to the existing oxidizer is required.

Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Press #4: AC16-093347 issued 2/12/85; expired 3/31/86

Press #5: AC16-259725 issued 12/5/94; expires 5/15/95

Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
 if power plant, hrs/yr _____ ; if seasonal, describe: Normal operation of the equipment is
3 shifts, 5 to 7 days per week, 52 weeks per year, with projected 20% downtime for
cylinder changes, re-webbing, maintenance, clean up, etc.

If this is a new source or major modification, answer the following questions.
 (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? Yes
 - a. If yes, has "offset" been applied? No
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? Yes
 - c. If yes, list non-attainment pollutants. OZONE
 2. Does best available control technology (BACT) apply to this source?
 If yes, see Section VI. _____
 3. Does the State "Prevention of Significant Deterioration" (PSD)
 requirement apply to this source? If yes, see Sections VI and VII. _____
 4. Do "Standards of Performance for New Stationary Sources" (NSPS)
 apply to this source? _____
 5. Do "National Emission Standards for Hazardous Air Pollutants"
 (NESHAP) apply to this source? _____
- Do "Reasonably Available Control Technology" (RACT) requirements apply
 to this source? _____
- a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form,
 any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
 cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Paper	None			
Coatings	VOC	54 (Avg)	264.5	Presses 4 & 5
Solvents	VOC	100	310.5	Presses 4 & 5

Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2 ²	Allowable Emission lbs/hr ³	Potential Emission ⁴		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/xx hr.	T/yr	
VOC	28.8	95			575	1900	Press4&5
(see Attachment B for calculations)							

See Section V, Item 2.

Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, (1) - 0.1 pounds per million BTU heat input)

Calculated from operating rate and applicable standard.

Emission, if source operated without control (See Section V, Item 3).

100% capture and 95% destruction efficiency required by Consent Order dated November 14, 1994 (See Attachment C)

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Paper	None			
Coatings	VOC	54 (Avg)	161	Press 4
Solvents	VOC	100	189	Press 4
Total Press #4			350	
(See Attachment B)				

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): _____
2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

Best Available Copy

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Paper	None			
Coatings	VOC	54 (Avg)	207	Press 5
Solvents	VOC	100	243	Press 5
Total Press #5			450	
(See Attachment B)				

Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2 ²	Allowable Emission lbs/hr ³	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	

Section V, Item 2.

reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, 1) - 0.1 pounds per million BTU heat input)

calculated from operating rate and applicable standard.

emission, if source operated without control (See Section V, Item 3).

Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Demtrol Enclosures	VOC	100% Capture		Manufacturers Warranty
Demtrol Oxidizer	VOC	95% Destruction		Manufacturers Warranty
			(See Attachment D)	

Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas			
Press #4 & #5 Combine)	0.0067	0.0092	11.2 (At start-up)
Control Device	0.0027	0.0045	6.0

Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: .00017% Percent Ash: -0-
 Density: .05 lb/cf ~~lb/cu ft~~ Typical Percent Nitrogen: 0.6%
 Heat Capacity: 1042 BTU/CF BTU/lb _____ BTU/gal _____
 Other Fuel Contaminants (which may cause air pollution): _____

If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

Indicate liquid or solid wastes generated and method of disposal.

Best Available Copy

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas			
Press #4	0.0031	0.0042	5.15

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

7. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

8. Indicate liquids or solid wastes generated and method of disposal.

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas			
Press #5	.0036	.0050	6.05

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Best Available Copy

Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 39 ft. Stack Diameter: 4.17 ft.
 Gas Flow Rate: 30,868 ACFM 20,000 DSCFM Gas Exit Temperature: 358 °F.
 Sulfur Vapor Content: Varies % Velocity: 37.73 FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type 1 (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr incinerated							
Incon-trolled (lbs/hr)							

Description of Waste _____

Actual Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

For 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

ATTACHMENT B
SECTION III C: Airborne Contaminants Emitted

Section III C: The value of 95 tons of VOC's per year proposed as the maximum actual emissions is based on discussions at a meeting with the DEP and RESD on November 22, 1994; a second meeting between Howard Rhodes and Bruce Mitchell of DEP and Bob Williams, of JSC, representing D-Graphics, on December 1, 1994; and a third meeting between John Brown, Bruce Mitchell, and Charles Logan of DEP and Bob Dinehart and Bob Williams of JSC, representing D-Graphics, on December 5, 1994.

The VOC capture rate of 100% and the VOC destruction efficiency of 95% are required by the Consent Order, dated November 14, 1994, and is guaranteed by the designer and supplier of the enclosure and the catalytic oxidizer, Demtrol Systems Division of Hartland, WI.

Annual emission rate: 95 tons of VOC's per year

Number of operating hours: 6600 hours per year for each press

Maximum lbs./hr. emissions: $95 \text{ tons} \times 2000 \text{ lbs./ton} / 6600 \text{ hrs.} =$
28.8 lbs./hr.

Potential emission: $28.8 \text{ lbs./hr.} / 1/95\% \text{ destruction efficiency} =$
575 lbs./hr loading

Maximum emissions for each press is based on 40% additional capacity: $575 \text{ lbs./hr.} \times 1.40 = 800 \text{ lbs./hr.}$

One press may run at a higher capacity as long as the total lbs./hr. applied does not total more than 575 lbs./hr.

800 lbs./hr. is distributed:

350#/hr. on press #4

450#/hr. on press #5

Attachment C

Section III C: Allowed Emission Rate

Page 10 of Consent Order, dated November 14, 1994

31. The Respondent shall, within 10 days of issuance of Permit AC16-259725, surrender the Air Construction permit, AC16-105518 for Press No. 2. Respondent reserves any creditable emission reductions or offsets available from Press No. 2.

32. The Respondent shall, with any future modification as defined by F.A.C. Rule 62-212.200(46), configure the existing Press No. 5 and any other presses being installed in a total enclosure intended to achieve substantially 100% capture of all VOC emissions. No operation of the modified system shall be allowed in the new configuration without a design intended for substantially 100% capture as described above. Respondent reserves any creditable emission reductions or offsets available.

33. In the event that no further modifications are made to the Facility, the Respondent shall take action intended to achieve substantially 100% capture of all VOC emissions, not later than June 30, 1996. Respondent reserves any creditable emission reductions or offsets available.

34. Within 90 days of execution of this Consent Order, Respondent shall submit to RESD complete engineering drawings of the present capture, control (i.e., incinerator) airhandling and electrical systems.

35. Within 90 days of execution of this Consent Order, Respondent shall undertake a study of technology to reduce or eliminate VOC's

Attachment D
Section III D: Control Devices
Basis for Efficiency

651 North Avenue
Jacksonville, FL 32200
(414) 367-7548
FAX: (414) 367-0831

Demtrol Systems Division
Diversified Emission Control

December 1, 1994

D-GRAPHICS
Division of Dinagraphics, Inc.
3389 Powers Avenue
Jacksonville, FL 32207
Attn: Mr. Doug Turner/Plant Manager

Dear Mr. Turner,

The purpose of this letter is identify our responsibility for the total enclosure project, which also is to encompass certain aspects on the relocation of press #4 along side of press #5.

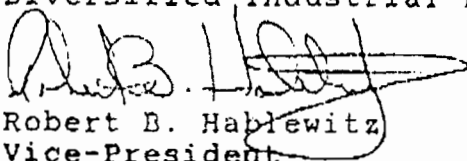
DEMTROL SYSTEMS DIVISION will guarantee that the total enclosure and capture system we design and install will meet the federal guidelines of "PROCEDURE T" and thus capture 100% of the VOC's from both gravure presses identified as #4 and #5. In addition to the above, all the captured VOC's from the enclosure will be destroyed by the existing catalytic oxidizer system by an amount at not less then 95% based on EPA Method 25A, on a methane free basis.

We are prepared to begin detailed engineering on this project as soon as you can receive air permit approval from both local and state agencies. If desired, once engineering is completed we would be willing to meet with, and discuss, or provide these drawings and additional information to the appropriate agency personnel.

Should you require any further information, please do not hesitate to call on us.

Thanking you in advance for your time and consideration.

Sincerely,
DEMTROL SYSTEMS DIVISION of
Diversified Industrial Products, Inc.


Robert B. Hablewitz
Vice-President
RBH/sj



JEFFERSON SMURFIT CORPORATION
D-Graphics Division

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

December 2, 1994

Mr. C. H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

DEC 5 1994

Bureau of
Air Regulation

Re: Press #4 Relocation Project With Total Enclosure

Dear Mr. Fancy:

Enclosed are three copies of an "Application To Operate/Construct Air Pollution Sources" for the D-Graphics press #4 relocation project that will include a total enclosure of both press #4 & #5. This project was presented at a November 22, 1994 meeting in your offices. We are confident the preliminary engineering concepts will hold true through detailed engineering, and the system as requested in this application will accomplish 100% capture and 95% destruction of VOC's from press #4 & #5.

If you have any questions regarding this application, please call me at 733-4020; Bob Dinehart, our Division Engineer, at 708-260-3574; or Jim Manning at 269-7012.

Sincerely,

Douglas V. Turner
Plant Manager
D-Graphics

Attachments

cc: Jim Manning, P.E.

C. Logan
R. Robinson
J. Cole



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form # _____
Form Title _____
Effective Date _____
DER Application No. _____ (Filed in by DER)

AC 16-261912

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Rotoqravure Printing Press [] New¹ [X] Existing¹

APPLICATION TYPE: [X] Construction [] Operation [X] Modification

COMPANY NAME: D-Graphics, Div of Jefferson Smurfit Corp. COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired)

SOURCE LOCATION: Street 3389 Powers Avenue City Jacksonville

UTM: East _____ North _____

Latitude 30 ° 15 ' 55 "N Longitude 81 ° 37 ' 18 "W

APPLICANT NAME AND TITLE: Douglas V. Turner, Plant Manager

APPLICANT ADDRESS: 3389 Powers Avenue, Jacksonville, Florida 32207

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of D-Graphics-Div of Jefferson Smurfit Corp.

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Douglas V. Turner

Douglas V. Turner, Plant Manager
Name and Title (Please Type)

Date: 12/2/94 Telephone No. 904-733-4020

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

1 See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed James L. Manning
James L. Manning
Name (Please Type)

Company Name (Please Type)
5077 Toproyal Lane, Jacksonville, Fl. 32277
Mailing Address (Please Type)

Florida Registration No. 36124 Date: 12/2/94 Telephone No. 904-744-7005

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

To relocate Press #4 adjacent to Press #5 including foundation enhancement and operational controls. Construct a total enclosure that captures 100% of VOC emissions from the operation of Press #4 & #5 and evacuates to the existing catalytic oxidizer system. The press and control system will comply with all applicable regulations. (See Attachment A)

B. Schedule of project covered in this application (Construction Permit Application Only)
Start of Construction January 15, 1995 Completion of Construction December 31, 1995

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

The cost of reconfiguring the collection system duct work and construction of the total enclosure to include the supply air and control system is approximately \$500,000. Final cost will be determined after completion of detailed engineering. No changes to the existing oxidizer is required.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Press #4: AC16-093347 issued 2/12/85; expired 3/31/86
Press #5: AC16-259725 issued 12/1/94; expires 5/15/95

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____; if seasonal, describe: Normal operation of the equipment is
3 shifts, 5 to 7 days per week, 52 weeks per year, with projected 20% downtime for
cylinder changes, re-webbing, maintenance, clean up, etc.

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? _____
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. _____
3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. _____
4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? _____
5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? _____

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? _____
- a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Paper	None			
Coatings	VOC	54 (Avg)	276	Presses 4 & 5
Solvents	VOC	100	324	Presses 4 & 5

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
VOC	30	99			600	1980	Press4&5
(See Attachment B for calculations)							

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

*100% capture and 95% destruction efficiency required by Consent Order dated November 14, 1994 (See Attachment C)

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Dentrol Enclosures	VOC	100% Capture		Manufacturers Warranty
Dentrol Oxidizer	VOC	95% Destruction		Manufacturers Warranty
			(See Attachment D)	

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas			
(Press #4 & #5 Combine)	0.0067	0.0092	11.2 (At start-up)
Control Device	0.0027	0.0045	6.0

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: -0- Percent Ash: -0-

Density: --- lbs/gal Typical Percent Nitrogen: ---

Heat Capacity: 1042 BTU/CF BTU/lb --- BTU/gal

Other Fuel Contaminants (which may cause air pollution): ---

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average --- Maximum ---

G. Indicate liquid or solid wastes generated and method of disposal.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 39 ft. Stack Diameter: 4.17 ft.
 Gas Flow Rate: 30,868 ACFM 20,000 DSCFM Gas Exit Temperature: 358 °F.
 Water Vapor Content: Varies % Velocity: 37.73 FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____
 Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____
 Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____
 Manufacturer _____
 Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____
 Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

- 9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
- 10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant

Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant

Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:

2. Operating Principles:

3. Efficiency:*

4. Capital Costs:

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.
- b. Diameter: ft.
- c. Flow Rate: ACFM
- d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

- 1.
 - a. Control Device:
 - b. Operating Principles:
 - c. Efficiency:¹
 - d. Capital Cost:
 - e. Useful Life:
 - f. Operating Cost:
 - g. Energy:²
 - h. Maintenance Cost:
 - i. Availability of construction materials and process chemicals:
 - j. Applicability to manufacturing processes:
 - k. Ability to construct with control device, install in available space, and operate within proposed levels:

- 2.
 - a. Control Device:
 - b. Operating Principles:
 - c. Efficiency:¹
 - d. Capital Cost:
 - e. Useful Life:
 - f. Operating Cost:
 - g. Energy:²
 - h. Maintenance Cost:
 - i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

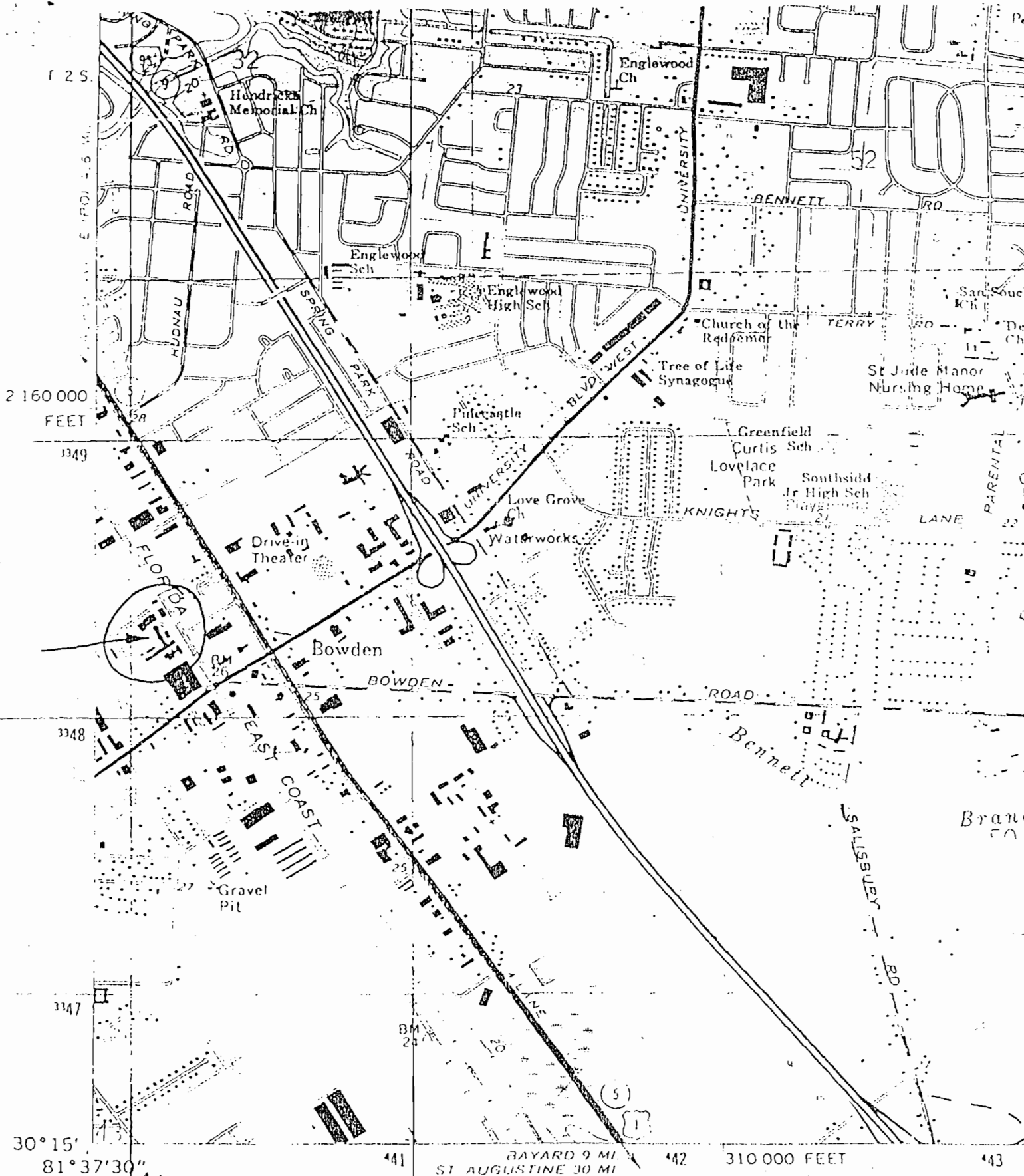
Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

ATTACHMENT A
Drawings

- #1. Plot Plan Showing Location Of Facility (8 1/2" X 11")
- #2. 1st Enclosure Exhaust Schematic (36" X 24" blueprint)
- #3 2nd Enclosure Exhaust Schematic (36" X 24" blueprint)
- #4. Preliminary Enclosure Layout (36" X 24" blueprint)



Mapped, edited, and published by the Geological Survey
 Control by USGS, NOS/NOAA, and Florida Geodetic Survey

Planimetry compiled from NOS charts 1933. Topography from
 planetable surveys 1948. Revised by photogrammetric methods
 from aerial photographs taken 1963. Field checked 1963

Selected hydrographic data compiled from NOS chart 577 (1963)
 This information is not intended for navigational purposes

Polyconic projection. 10,000-foot grid ticks based on Florida

Attachment A - #1

ARLINGTON
QUADRANGLE

2 1/2"
 44 MILES

ICE PARK I
 14 11 NW

ATTACHMENT B-
Airborne Contaminants Emitted

Section III C: The value of **99 tons** of VOC's per year proposed as the maximum actual emissions is based on discussions at a meeting with the DEP and RESD on November 22, 1994 and a subsequent meeting between Howard Rhodes and Bruce Mitchell of DEP and Bob Williams, of JSC representing D-Graphics, on December 1, 1994.

The VOC capture rate of 100% and the VOC destruction efficiency of 95% are required by the Consent Order, dated November 14, 1994, and is guaranteed by the designer and supplier of the enclosure and the catalytic oxidizer, Demtrol Systems Division of Hartland, WI.

Annual emission rate: **99 tons of VOC's per year**

Number of operating hours: **6600 hours per year**

Maximum lbs./hr. emissions: $99 \text{ tons} \times 2000 \text{ lbs./ton} / 6600 \text{ hrs.} =$
30 lbs./hr.

Attachment C
Section IIIC: Allowed Emission Rate
Page 10 of Consent Order, dated November 14, 1994

31. The Respondent shall, within 10 days of issuance of Permit AC16-259725, surrender the Air Construction permit, AC16-105518 for Press No. 2. Respondent reserves any creditable emission reductions or offsets available from Press No. 2.

32. The Respondent shall, with any future modification as defined by F.A.C. Rule 62-212.200(46), configure the existing Press No. 5 and any other presses being installed in a total enclosure intended to achieve substantially 100% capture of all VOC emissions. No operation of the modified system shall be allowed in the new configuration without a design intended for substantially 100% capture as described above. Respondent reserves any creditable emission reductions or offsets available.

33. In the event that no further modifications are made to the Facility, the Respondent shall take action intended to achieve substantially 100% capture of all VOC emissions, not later than June 30, 1996. Respondent reserves any creditable emission reductions or offsets available.

34. Within 90 days of execution of this Consent Order, Respondent shall submit to RESD complete engineering drawings of the present capture, control (i.e., incinerator) airhandling and electrical systems.

35. Within 90 days of execution of this Consent Order, Respondent shall undertake a study of technology to reduce or eliminate VOC's

Attachment D
Section III D: Control Devices
Basis for Efficiency



Demtrol Systems Division
Diversified Emission Control

651 North Avenue
Hartland, WI 53029
(414) 367-7548
FAX (414) 367-0831

December 1, 1994

D-GRAPHICS
Division of Dinagraphics, Inc.
3389 Powers Avenue
Jacksonville, FL 32207
Attn: Mr. Doug Turner/Plant Manager

Dear Mr. Turner,

The purpose of this letter is identify our responsibility for the total enclosure project, which also is to encompass certain aspects on the relocation of press #4 along side of press #5.

DEMTROL SYSTEMS DIVISION will guarantee that the total enclosure and capture system we design and install will meet the federal guidelines of "PROCEDURE T" and thus capture 100% of the VOC's from both gravure presses identified as #4 and #5. In addition to the above, all the captured VOC's from the enclosure will be destroyed by the existing catalytic oxidizer system by an amount at not less then 95% based on EPA Method 25A, on a methane free basis.

We are prepared to begin detailed engineering on this project as soon as you can receive air permit approval from both local and state agencies. If desired, once engineering is completed we would be willing to meet with, and discuss, or provide these drawings and additional information to the appropriate agency personnel.

Should you require any further information, please do not hesitate to call on us.

Thanking you in advance for your time and consideration.

Sincerely,
DEMTROL SYSTEMS DIVISION of
Diversified Industrial Products, Inc.

A handwritten signature in black ink, appearing to read 'Robert B. Hablewitz', is written over the typed name.

Robert B. Hablewitz
Vice-President
RBH/sj