Check Sheet

Company Name: D-GRAPHICS
Permit Number: AC16-259725
PSD Number:
Permit Engineer:

Cross References:
- ☐
- ☐
- ☐

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

Revision #5

12-5-94
@ 3:40 p.m.
I gave Mr. Bob Williams 2 copies of this document.
R Bunn

Final Determination

D-Graphics
Duval County, Florida

Department Construction Permit No.
AC 16-259725

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

December 5, 1994

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 Corp.
3389 Powers Avenue
Jacksonville, Florida 32231

4a. Article Number
Z 751 860 007

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

7. Date of Delivery
12-19-94

5. Signature (Addressee)
Dorothea Dowell

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

6. Signature (Agent)

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

Thank you for using Return Receipt Service.

Z 751 860 007

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

UNITED STATES POSTAL SERVICE

Sent to: Mr. Douglas V. Turner	
Street and No.: 3389 Powers Avenue	
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: 12/06/94 AC 16-259725	

PS Form **3800**, March 1993

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DEP File No. AC 16-259725
Duval County

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

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

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 12/6/94 to the listed persons.

Clerk Stamp

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

Charlotte J. Hayes (Clerk) 12/5/94 (Date)

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

Final Determination

D-Graphics
Duval County, Florida

Department Construction Permit No.
AC 16-259725

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

December 5, 1994

Final Determination

D-Graphics

AC 16-259725

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

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

Construction Permit: **Specific Conditions**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attachments to be incorporated: AC 16-259725

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

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

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

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

Permit Number: AC 16-259725
Expiration Date: May 15, 1995
County: Duval
Latitude/Longitude: 30°15'55"N 81°37'18"W
Project: Rotogravure Printing Press No. 5 Modification

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

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

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

Attachments are listed below:

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

GENERAL CONDITIONS:

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

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or

GENERAL CONDITIONS:

auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

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

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

c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

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

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

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source

GENERAL CONDITIONS:

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

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

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Compliance with New Source Performance Standards (NSPS)
(X) Determination of Lowest Achievable Emission Rate (LAER)

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application

GENERAL CONDITIONS:

for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. This permit supersedes construction permit No. AC 16-089528.

2. The hours of operation for Press No. 5 shall not exceed 6088 hours per calendar year (January 1 through December 31) of run time.

3. The maximum allowable volatile organic compounds (VOC) applied to the substrate shall not exceed 178.6 pounds per hour and the maximum allowable VOC emissions shall not exceed 130.5 tons per calendar year.

4. The source is subject to the emission standards established through a LAER determination signed February 18, 1985, which requires 80% overall capture and transport efficiency of the VOC delivered to the substrate and 95% total destruction of all VOC delivered to the inlet of the catalytic incinerator. The total allowable VOC emissions for the Press No. 5 shall not exceed 130.5 tons per calendar year.

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:
D-Graphics

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

SPECIFIC CONDITIONS:

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

Issued this 5 day
of December, 1994

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Howard L. Rhodes

Howard L. Rhodes, Director
Division of Air Resources
Management

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes

FROM: Clair Fancy

DATE: December 5, 1994

SUBJECT: Approval of Construction Permit
AC 16-259725
D-Graphics

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

I recommend your approval and signature.

HLR/BM/rbm

cc: S. Pace, DCR + ESD
C. Kirts, NED
G. Harper, EPA
G. Burnyat, NPS
G. Braswell, DEP
B. Mitchell

RECEIVED
DEC 1 1994
Bureau of
Air Regulation

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

November 16, 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 22 day of November A.D. 1994

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

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

DA 444

Robin Rady

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

AC 16-259725

The Department of Environmental Protection (De partment) hereby gives notice of its intent to issu an air construction permit to D-Graphics, 3389 Pow ers Avenue, Jacksonville, Duval County, Florid 32231, for a modification to increase the allowabl emissions of volatile organic compounds (VOCs) fo Press #5. The modification request was for an in crease of 39.9 tons/year (TPY) of VOCs, which wi result in an annual allowable emission limit of 130. TPY of VOCs for Press #5. The limit is for a caler dar year (January 1 through December 31). Pres #5 is subject to the requirements and conditions o a determination of Lowest Achievable Emissio Rate, which was issued at an earlier permitting action.

A person whose substantial interests are affecte by the Department's proposed permitting decisio may petition for an administrative proceedin (hearing) in accordance with Section 120.57, Florid Statutes (F.S.) The petition must contain the infor mation set forth below and must be filed (received in the office of General Counsel of the Departmer at 2600 Blair Stone Road, Tallahassee, Florid 32399-2400, within fourteen (14) days of publicatio of this notice. Petitioner shall mail a copy of the pe tition to the applicant at the address indicate above at the time of filing. Failure to file a petitio within this time period shall constitute a waiver o any right such person may have to request an ad ministrative determination (hearing) under Sectio 120.57 F.S.

The Petition shall contain the following information:
(a) The name, address, and telephone number o each petitioner, the applicant's name and addres the Department Permit File Number and the cou ty in which the project is proposed;
(b) A statement of how and when each petitioner re ceived notice of the Department's action or pro posed action;
(c) A statement of how each petitioner's substantia interests are affected by the Department's action o proposed action;
(d) A statement of the material facts disputed b Petitioner, if any;
(e) A statement of facts which petitioner contend warrant reversal or modification of the Depar ment's action or proposed action;
(f) A statement of which rules or statutes petitione contends require reversal or modification of the De partment's action or proposed action; and,
(g) A statement of the relief sought by petitioner stating precisely the action petitioner wants the De partment to take with respect to the Department action or proposed action.

If a petition is filed, the administrative hearing pro cess is designed to formulate agency action. Ac cordingly, the Department's final action may be di ferent from the position taken by it in this Notice Persons whose substantial interests will be affecte by any decision of the Department with regard t the application have the right to petition to becom a party to the proceeding. The petition must con form to the requirements specified above and b filed (received) within 14 days of publication of thi notice in the Office of General Counsel at the abov address of the Department. Failure to petition with in the allowed time frame constitutes a waiver o any right such person has to request a hearing un der Section 120.57, F.S., and to participate as a pa ty to this proceeding. Any subsequent interventio will only be at the approval of the presiding office upon motion filed pursuant to Rule 28.5.207, Florid Administrative Code.

The application is available for public inspectio during business hours, 8:00 a.m. to 5:00 p.m., Mon day 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 Depar ment's Tallahassee address. All comments receive within 14 days of the publication of this notice will be considered in the Department's final determination.

LAW OFFICES

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R. L. CALEEN, JR.
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HAROLD QUACKENBUSH
G. DOUG DUTTON
ENVIRONMENTAL CONSULTANTS
(NOT MEMBERS OF THE FLORIDA BAR)

MEMORANDUM

BY FEDERAL EXPRESS

To: Steve Pace
Chris Kirts

From: TC Terry Cole

Re: D-Graphics - DEP's Intent to Issue Construction Permit

Date: November 15, 1994

Attached is a copy of the Department of Environmental Protection's Intent to Issue a construction permit. The public notice is appearing in the Times-Union on November 16, 1994. We had a faxed copy of this hand delivered to you on November 15 to ensure a copy was available at the opening of the office on November 16, 1994.

Attachment

c: Jeff Braswell
Bruce Mitchell

Cole\D-Graphics\Pace11.15/kmp

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
3389 Powers Avenue
Jacksonville, FL 32231

4a. Article Number
P 872 562 684

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

7. Date of Delivery

5. Signature (Addressee)

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

6. Signature (Agent)
Joyce Kitchens

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

Thank you for using Return Receipt Service.

P 872 562 684

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

UNITED STATES POSTAL SERVICE

Sent to: Mr. Douglas V. Turner	
Street and No.: 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: 11-15-94 Permit: AC16-259725	

PS Form 3800, JUNE 1991

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 15, 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 an increase in the allowable emissions of volatile organic compounds for Press #5. The modification will occur at the existing facility located in Duval County.

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

Sincerely,

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

CHF/BM/rbm

Attachments

c: 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

In the Matter of
Application for Permit by:

D-Graphics
3389 Powers Avenue
Jacksonville, Tampa, Florida 32231

DEP File No. AC 16-259725

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 October 26, 1994, for an increase in the allowable emissions of volatile organic compounds (VOCs) for Press #5. The modification request was for an increase of 39.9 tons/year (TPY) of VOCs, which will result in an annual allowable emission limit of 130.5 TPY of VOCs for Press #5. The 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 federal enforceable reasons.

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/request 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 November 15, 1994.

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

Charlotte J. Hayes 11/15/94
Clerk Date

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

AC 16-259725

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, for a modification to increase the allowable emissions of volatile organic compounds (VOCs) for Press #5. The modification request was for an increase of 39.9 tons/year (TPY) of VOCs, which will result in an annual allowable emission limit of 130.5 TPY of VOCs for Press #5. The limit is for a calendar year (January 1 through December 31). Press #5 is subject to the requirements and conditions of a determination of Lowest Achievable Emission Rate, which was issued at an earlier permitting action.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:
(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
(d) A statement of the material facts disputed by Petitioner, if any;
(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

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

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

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

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

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

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

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

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

Technical Evaluation
and
Preliminary Determination

D-Graphics
Duval County
Jacksonville, Florida

Press #5 Modification
Department Permit Number: AC 16-259725

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

November 15, 1994

I. Application

A. Applicant

D-Graphics
3389 Powers Avenue
Jacksonville, Florida 32231

B. Project/Location/Classification

The Department received a complete application on October 26, 1994, for a permit to allow a 39.9 tons per year (TPY) increase in volatile organic compounds (VOCs) for Press #5 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 E and 3348.2 km N.

II. Project Description

D-Graphics has requested an increase in the allowable VOC emissions by 39.9 TPY for Press #5. The emissions of VOCs will be collected and transported to an incinerator. The minimum collection/transport and destruction efficiencies were established through a LAER (lowest achievable emissions rate) determination. D-Graphics intends to install sweeps at various locations in the process in order to immediately capture VOC emissions as they are emitted, thus decreasing fugitive VOC emissions. Also, D-Graphics intends to install a permanent enclosure around Press #5 after the engineering design has been completed and approved.

The LAER determination established a minimum capture and transport efficiency of 80% and a minimum destruction efficiency of 95%.

III. Emissions

The existing facility's allowable VOC emissions are: Press #4 @ 195.1 TPY and Press #5 @ 90.6 TPY. The increase of 39.9 TPY of VOC allowables for Press #5 will establish a new allowable emission limit of 130.5 TPY VOCs for Press #5. The limitation 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, Florida Administrative Code (F.A.C.). The proposed modification will occur in an area classified as transitional nonattainment for ozone, unclassifiable for PM_{10} and SO_2, and in the area of influence of the air quality maintenance area for particulate matter.

The proposed 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 modification is subject to the LAER determination requirements and conditions for Press #5. Because the facility was constructed at the time that the area was classified as a nonattainment area for ozone, the VOC emissions would be limited in accordance with the RACT (reasonable available control technology) if it was not limited by a LAER determination.

The VOC collection/transport and destruction efficiencies shall be demonstrated in accordance with Rule 62-297.450, F.A.C., and shall be conducted twice every fiscal year (October 1 through September 30). Accounting of VOC emissions shall be verifiable on a 24-hour basis 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 after the end of the quarter (January-March, April-June, July-September, and October-December).

V. AIR QUALITY IMPACT ANALYSIS

Based on the increase in the VOC emissions of 39.9 TPY, 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 modification to Press #5, 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 16-259725
Expiration Date: May 15, 1995
County: Duval
Latitude/Longitude: 30°15'55"N
81°37'18"W
Project: Rotogravure Printing Press No. 5 Modification

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

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

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

Attachments are listed below:

1. Application to Modify an Air Pollution Source received on October 26, 1994.
2. Mr. Lloyd H. Stebbins's letter with Attachment received June 1, 1987.
3. Mr. Dale Twachtmann's letter dated June 8, 1987.
4. Mr. C. H. Fancy's letter dated November 7, 1994.
5. Mr. Douglas Turner's letter with enclosures received November 8, 1994.

GENERAL CONDITIONS:

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

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or

GENERAL CONDITIONS:

auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

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

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

c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

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

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

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source

GENERAL CONDITIONS:

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

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

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Compliance with New Source Performance Standards (NSPS)
(X) Determination of Lowest Achievable Emission Rate (LAER)

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application

GENERAL CONDITIONS:

for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. This permit supersedes construction permit No. AC 16-089528.

2. The hours of operation for Press No. 5 shall not exceed 6088 hours per calendar year (January 1 through December 31) of run time.

3. The maximum allowable volatile organic compounds (VOC) applied to the substrate shall not exceed 178.6 pounds per hour and the maximum allowable VOC emissions shall not exceed 130.5 tons per calendar year.

4. The source is subject to the emission standards established through a LAER determination signed February 18, 1985, which requires 80% overall capture and transport efficiency of the VOC delivered to the substrate and 95% total destruction of all VOC delivered to the inlet of the catalytic incinerator. The total allowable VOC emissions for the Press No. 5 shall not exceed 130.5 tons per calendar year.

SPECIFIC CONDITIONS:

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

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

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

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

9. The use of all coatings and solvents shall be recorded daily. Accounting of VOC emissions (42.9 lbs/hr or less) shall be verifiable on a 24-hour basis and shall be reported on a monthly basis in a quarterly report. This shall be done by documenting, through measurements and records, that the VOCs applied to the substrate do not exceed 178.6 lbs/hr and maintaining records to demonstrate that the VOC capture/transport and destruction system is maintained and operated properly. The report shall be provided to the Duval County's R&ESD. The quarterly reports shall be submitted by the 15th day after the end of the quarter (January-March, April-June, July-September, and October-December).

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

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:
D-Graphics

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

SPECIFIC CONDITIONS:

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

Issued this _____ day
of _____, 1994

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

_____
Howard L. Rhodes, Director
Division of Air Resources
Management

D-GRAPHICS

DIVISION OF
JEFFERSON SMURFIT CORP.
3389 Powers Avenue
Jacksonville, Florida 32207
TELEFAX NUMBER: 904-733-4381
TELEPHONE NUMBER: 904 733 4020

FROM: Bob Williams

TO: Bruce Mitchell

23 PAGES ARE BEING TRANSMITTED EXCLUDING COVER SHEET

MESSAGE:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

OCT 06 1993

MEMORANDUM

SUBJECT: Draft Capture Efficiency Guidance Document

FROM: Candace B. Sorrell CBS
Chemicals and Petroleum Testing Section
Emission Measurement Branch, TSD (MD-19)

TO: See Addressees

Attached is a draft document entitled "Guidelines for Determining Capture Efficiency." The purpose of the document is to provide Environmental Protection Agency (EPA) Regional Offices, and State and local agencies with guidance regarding capture efficiency (CE). This guidance includes information on the permanent and temporary total enclosure protocols and alternative CE protocols. We would like to have your impression of the guidance document. Please review and give me any comments or suggestions by October 29, 1993.

Attachment

Addressees:
Volatile Organic Compounds Policy Work Group
Volatile Organic Compounds Compliance Work Group

1067

GUIDELINES FOR DETERMINING CAPTURE EFFICIENCY

REVISED DRAFT

EPA Contract No. 68-D2-0165
Work Assignment No. 13
MRI Project No. 3713

Prepared for:

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September 30, 1993

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1.0 INTRODUCTION

1.1 Purpose

The primary purpose of this document is to provide guidance to U. S. Environmental Protection Agency (EPA) Regional Offices regarding capture efficiency (CE) testing. The document may also prove useful to State and local agency personnel and owners and operators of stationary sources required to determine CE.

1.2 Background

In April 1990, EPA issued new guidance on CE testing.[1] This guidance replaced conventional liquid/gas mass balance determinations, which had often resulted in very poor precision and CE values well in excess of 100 percent, with new protocols involving permanent total enclosures (PTE's), temporary total enclosures (TTE's), and building enclosures (BE's). This guidance was later codified as part of the Chicago Federal implementation plan (FIP) and included in the document "Model Volatile Organic Compound Rules for Reasonably Available Control Technology."[2,3]

From the beginning, the new protocols were met with resistance from the regulated community, primarily on grounds of safety and expense. Over time, the safety issue has largely been dispelled as it has become clear that, with proper design and operation, PTE's and TTE's pose minimal risk. However, it has also become clear that in some cases, the new CE protocols are more costly than the procedures they replaced.

To address the cost issue, EPA embarked on a 12-month study of alternatives with potential for reducing CE testing costs. This document is a result of that study. In this document, EPA presents guidance on recommended procedures and on alternative procedures that may be allowed to reduce costs.

1.3 Document Organization

In Section 2.0, EPA's recommended protocols and test methods are summarized. Section 3.0 presents the criteria by which alternative procedures can be approved, as well as the reporting

requirements for using alternative procedures. Section 4.0 sets forth the guidelines for selecting and testing representative process lines at a facility, instead of testing every line. In Section 5.0, the guidelines for testing multiple lines in combination are presented. Finally, Section 6.0 presents an alternative procedure that can be used in place of periodic CE testing.

2.0 RECOMMENDED CAPTURE EFFICIENCY (CE) PROTOCOLS AND TEST METHODS

The CE determination protocols and test methods recommended by EPA are largely unchanged from those issued in the April 1990 guidance memo and codified in the Chicago FIP.[1,2] The EPA continues to recommend the use of a PTE, TTE, or BE for determining CE. When a TTE or BE is used, either a gas/gas protocol or a liquid/gas protocol may be selected. The EPA CE test methods for carrying out the recommended protocols will be published in the Federal Register and added to 40 CFR 60, Appendix A, as Method 30 through Method 30F. (Note that the location in the Code of Federal Regulations and the actual test method numbers are not final and may change.) Some minor changes have been made to the test methods, so the latest version of the methods should be consulted when planning CE testing.

Table 2-1 lists the protocols, their associated EPA recommended CE test methods, and the formulas for calculating CE. Table 2-2 lists the EPA recommended CE test methods with the full title of each.

TABLE 2-1.

Protocols	EPA recommended CE test methods[a]				CE formula
	Enclosure verification	Liquid input (L)	Captured emissions (G)	Fugitive emissions (F) or (F_a)	
PTE	M30	NA	NA	NA	Assume 100%
TTE — gas/gas	M30	NA	M30B or M30C	M30D	G/(G+F)
TTE -- liquid/gas	M30	M30A or M30F	NA	M30D	(L-F)/L
BE — gas/gas	M30	NA	M30B or M30C	M30E	G/(G+F_a)
BE -- liquid/gas	M30	M30A or M30F	NA	M30E	(L-F_a)/L

[a]M = EPA Method; NA = not applicable

TABLE 2-2.

Method 30	Criteria for and Verification of a Permanent or Temporary Total Enclosure
Method 30A	Volatile Organic Compounds Content in Liquid Input Stream
Method 30B	Volatile Organic Compounds Emissions in Captured Stream
Method 30C	Volatile Organic Compounds Emissions in Captured Stream (Dilution Technique)
Method 30D	Volatile Organic Compounds Emissions in Fugitive Stream from Temporary Total Enclosure
Method 30E	Volatile Organic Compounds Emissions in Fugitive Stream from Building Enclosure
Method 30F	Volatile Organic Compounds Content in Liquid Input Stream (Distillation Approach)

The PTE, TTE, and BE are discussed further in Sections 2.1 through 2.3, respectively.

2.1 Permanent Total Enclosure

Method 30 lists the PTE requirements and the procedures for verifying that an enclosure qualifies as a PTE. A PTE is an enclosure that completely surrounds a source of emissions such that all volatile organic compound (VOC) emissions are contained and directed to a control device. If a PTE meets the criteria listed below and all the exhaust gases from the enclosure are ducted to a control device, the CE may be assumed to be 100 percent and need not be measured. The PTE criteria are as follows:

1. Any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each VOC-emitting point. An "equivalent diameter" is the diameter of a circle that has the same area as the opening. The equation for an equivalent diameter (ED) is:

$$ED = [(4 \times \text{area})/\pi]^{0.5}$$

For a circular NDO, this equation simply reduces to the diameter of the opening.

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

3. The average face velocity (FV) of air through all NDO's shall be at least 200 ft/min. The direction of air through all NDO's shall be into the enclosure.

4. All access doors and windows whose areas are not included as NDO's and are not included in the calculation of FV shall be closed during routine operation of the process.[4]

If the PTE criteria are not met, the CE must be measured.

2.2 Temporary Total Enclosure

Method 30 lists the TTE requirements and the test procedures for verifying that an enclosure qualifies as a TTE. A TTE is an enclosure temporarily installed specifically for the CE test.[4] For an enclosure to qualify as a TTE, the criteria listed in

Section 2.1 for PTE's must be met. In addition, any exhaust point from the TTE shall be at least 4 equivalent duct or hood diameters from each NDO. These five criteria ensure that all VOC's are captured for measurement while minimizing disruption of the capture normally achieved by the existing capture device(s) in the absence of a TTE.[4]

Two protocols may be used to measure the CE, a gas/gas protocol or a liquid/gas protocol. The associated test methods and CE formula for each protocol are listed in Table 2-1.

2.3 Building Enclosure

Building enclosure protocols involve using the building that houses the process as the enclosure. First, one must verify that the BE meets the requirements for a TTE that are presented in Method 30. Then, using the procedures specified in Method 30E, one must identify all the emission points from the building enclosure (e.g., roof exhausts, windows, etc.) and determine which emission points must be tested. Test procedures are given for determining the flow rate and VOC concentration in the exhaust from each of the various emission test points.

As with a TTE, two BE protocols may be used to measure the CE, a gas/gas protocol or a liquid/gas protocol. The associated test methods and CE formula for each protocol are listed in Table 2-1.

3.0 REQUIREMENTS FOR ALTERNATIVE CE PROTOCOLS

The EPA recognizes that the recommended CE protocols may not be feasible at all sites. To provide flexibility, EPA has developed approval criteria which, when met, allow the use of alternative protocols and test methods. Alternative CE protocols and test methods must meet the data quality objective (DQO) and additional criteria presented below. The DQO and additional criteria are described in Sections 3.1 and 3.2, respectively. The reporting requirements necessary for using alternative CE protocols and test methods are discussed in Section 3.3.

3.1 Data Quality Objective

The purpose of the DQO is to allow sources to use alternative CE test procedures while ensuring reasonable precision. The DQO calculation is as follows:

$$a = \frac{t_{0.95}\, s}{\sqrt{n}}$$

$$DQO = \frac{a}{x_{avg}}\, 100$$

where n = number of test runs

s = standard deviation = $\left[\frac{\sum_{i=1}^{n} (x_i - x_{avg})^2}{n-1}\right]^{0.5}$

where x_i = the CE value calculated from the ith test run

$$x_{avg} = \frac{\sum_{i=1}^{n} x_i}{n}$$

$t_{0.95}$ = t-value at the 95 percent confidence limit (the t-value can be found in a statistical table correlating t_α to υ, where $\alpha = 0.025$ (one-tailed test) and $\upsilon = n-1$)

NOTE: The final document will include a table of t-values.

x_{avg} = average CE result, calculated as shown above in the definition of s

The DQO is achieved when the following condition is met:

DQO $\leq$ 5 percent.

This requirement provides for a 95 percent confidence interval of ±5 percent about the average CE value. (In other words, assuming that the test protocol is unbiased and that the CE is constant from run to run, the actual CE will be within ±5 percent of the

CE determined by the test 95 percent of the time.) In order to meet this objective, facilities may have to conduct more than three test runs. Examples of calculating the DQO, given a finite number of test runs, are shown below.

Facility A conducted a CE test using a traditional liquid/gas mass balance and submitted the following results:

Run	CE
1	96.1
2	105.1
3	101.2

therefore:

$n = 3$

$t_{0.95} = 4.30$

$x_{avg} = 100.8$

$s = 4.51$

$$a = \frac{(4.30)\ (4.51)}{\sqrt{3}} = 11.20$$

$$DQO = \frac{11.2}{100.8}\ 100 = 11.11$$

Since the facility did not meet the DQO objective, they ran three more test runs.

Run	CE
4	93.2
5	96.2
6	87.6

The DQO calculations for Runs 1-6 are as follows:

$n = 6$

$t_{0.95} = 2.57$

$x_{avg} = 96.6$

$s = 6.11$

$$a = \frac{(2.57)\ (6.11)}{\sqrt{6}} = 6.41$$

$$DQO = \frac{6.41}{96.6}\ 100 = 6.64$$

The facility still did not meet the DQO objective. They ran three more test runs with the following results:

Run	CE
7	92.9
8	98.3
9	91.0

The DQO calculations for Runs 1-9 are as follows:

$n = 9$

$t_{0.95} = 2.31$

$x_{avg} = 95.7$

$s = 5.33$

$$a = \frac{(2.31)\ (5.33)}{\sqrt{9}} = 4.10$$

$$DQO = \frac{4.10}{95.7}\ 100 = 4.28$$

Based on the DQO results, the average CE result from the nine test runs, using the alternative method, can be used to determine compliance.

3.2 Additional Criteria

The Office of Air Quality Planning and Standards (OAQPS) has developed an additional set of criteria that must be met for alternative CE protocols and test methods to be approved. The following criteria apply:

1. A minimum of three valid test runs are required. A valid test run must last for at least 1 hour.

2. All the test runs must be separate and independent. For example, liquid VOC input and output must be determined independently for each run. The final liquid VOC sample from one run cannot be the initial sample for another run. In addition, liquid input for an entire day cannot be apportioned among test runs based on production.

3. Composite liquid samples will not be permitted to obtain an "average composition" for a test run. For example, separate initial and final coating samples must be taken and analyzed for

each run; initial and final samples cannot be combined prior to analysis to derive an "average composition" for the test run.

4. All test runs that are conducted must be included in the CE determination.

5. The average CE for the test program can not be greater than 105 percent.

6. Alternative test methods for measuring VOC concentration must include a three-point calibration of the gas analysis instrument in the expected concentration range.

7. If a temporary enclosure is to be used to measure fugitives, the enclosure must meet EPA's TTE criteria (i.e., Method 30).

8. If a BE is to be used to measure fugitives, EPA's TTE criteria (Method 30) and BE procedures (Method 30E) must be used.

9. If a facility elects to use measurement procedures different from the EPA recommended CE test methods (Methods 30 through 30F), the alternative procedures must be approved by the appropriate authority. The requirements are presented below. Additional guidance on approval of alternative methods can be found in a guideline document entitled "Handling Requests for Minor/Major Modifications/Alternative Testing and Monitoring Methods or Procedures Approvals and Disapprovals," which is included in an appendix to this document.

a. If a facility uses an EPA reference method, such as Method 24 or 25, in accordance with the current guidance, the individual methods can be approved by State or local agencies. Note that the test protocol still must meet the DQO and other acceptability criteria for the CE test to be acceptable.

b. If a facility wishes to make minor changes to an EPA reference method, the alternative method's acceptability can be determined by State or Regional authority, depending on the delegation status.

c. If a facility wishes to make major changes to an EPA reference method, the alternative method must be approved by the EPA Administrator.

3.3 Reporting Requirements for Alternative CE Protocols

A copy of all alternative test methods, including any major or minor changes to EPA reference methods, validation data when applicable, QA/QC information, and calibration procedures (this information should be submitted in advance so that approval can be obtained prior to testing).

If a facility chooses to use alternative CE protocols and test methods, the following information should be submitted with each test report to the appropriate regulatory agency:

1. A table with information on each liquid sample, including the sample identification, where and when the sample was taken, and the VOC content of the sample;

2. The coating usage for each test run (for protocols in which the liquid VOC input is to be determined);

3. The quantity of captured VOC measured;

4. The CE calculations and results;

5. The DQO calculations and results; and

6. The QA/QC results, including information on calibrations (e.g., how often the instruments were calibrated, the calibration results, and information on calibration gases, if applicable).

4.0 DETERMINING CE BASED ON TESTING REPRESENTATIVE LINES

Determining the CE by testing representative process lines instead of all the process lines at a facility can be approved by EPA if certain conditions are met. The guidelines for measuring the CE using representative line sampling are as follows:

1. The CE may be measured using representative line sampling only if one uses EPA's recommended CE protocols and test methods.

2. At least 50 percent of the lines in a facility should be randomly selected for CE testing.

3. Blind random selection should be used to select the lines to be tested. This blind selection of lines to be tested should be performed by the regulatory agency.

4. After the lines are selected, the facility owner/operator may perform only normal and routine maintenance on

the selected lines. No special modifications or overhauls should be permitted to enhance CE performance above normal operating conditions. Certification that the facility did not perform any nonroutine maintenance on the lines selected for testing must be submitted with the test report.

5. The number of lines not in compliance with the applicable emission limit for the facility is determined by multiplying the total number of lines in the facility by the fraction of the representative lines tested that were not in compliance.

6. If the owner/operator of a facility using the representative line testing approach believes the results are not indicative of the full facility, then the owner/operator may elect to test additional randomly selected lines in the facility. The results of these additional tests are combined with the results from the first group of representative lines to determine the new fraction of non-complying lines. This new fraction is used as specified in guideline No. 5, above, to determine the number of lines in the entire facility that are out of compliance.[3]

5.0 DETERMINING CE BASED ON COMBINED TESTING OF MULTIPLE LINES

Under some circumstances, multiple lines may be tested in combination. For example, a TTE could be constructed around several lines for a combined CE test. The guidelines are as follows:

1. The multiple lines must share a common control device.

2. Multiple line testing may be performed using recommended EPA protocols and test methods or alternative CE protocols and test methods, provided the alternative meets the requirements of Section 3.0.

3. The lines that are tested in combination are considered to be in compliance only if the CE determined for the combination of lines meets the most stringent CE required for any individual line.

EPA review question: Will all the lines that share a common control device have to be tested together? Could lines be tested in subsets? For example, could a facility choose to test lines subject to RACT together and test lines subject to an NSPS separately when <u>all</u> share a common control device? Testing lines in subsets could cause problems when the applicable emission standards are in terms of overall efficiency and the testing provisions require that CE and destruction efficiency be tested simultaneously.

6.0 ALTERNATIVE COMPLIANCE TECHNIQUE

After an initial CE determination, a source may use the alternative compliance technique described below in lieu of subsequent multiple-run CE determinations. The alternative compliance technique consists of two elements: (1) continuous monitoring of the VOC concentration in the duct leading to the control device and (2) a 3-hour liquid/gas material balance each month (i.e., measurement of the liquid VOC input to the process and the gaseous VOC ducted to the control device). The monitoring and material balances provide an ongoing indication of how the capture system is performing.

Although a single month's material balance is not sufficient to determine compliance or noncompliance, a series of monthly material balances can be treated as the multiple test runs of a CE determination, provided that the test procedures and results meet the requirements for an alternative test protocol that are presented in Sections 3.1 and 3.2. For this purpose, the number of months over which to determine compliance should be determined based on the requirements to which the source is subject. For example, if the source is required to demonstrate compliance annually, the 12 monthly material balances for the year could be averaged to determine the CE for the year, provided that the alternative CE protocol requirements were met. Note that the source runs the risk of conducting the continuous monitoring and

monthly material balances only to fail to achieve the DQO (see Section 3.1) and be required to conduct a CE test.

Specific guidelines for the alternative compliance technique are presented below:

1. The continuous emission monitoring system (CEMS) shall monitor total hydrocarbons as a surrogate for VOC. The CEMS shall conform to section XX.3086, "Performance Specifications for Continuous Emissions Monitoring of Total Hydrocarbons," presented in Reference 3.

2. The facility shall implement CEMS quality control procedures that meet the requirements of section XX.3087, "Quality Control Procedures for Continuous Emission Monitoring Systems," presented in Reference 3.

3. Facilities with multiple process lines need not operate a CEMS dedicated to each line. Instead, a single CEMS can be used to monitor emissions from multiple lines on a time-sharing basis, provided that the requirements of Method 30B, section 4.2.7 are met. (Although this section refers to sampling during a test run, the requirements provide guidance for time sharing for continuous monitoring.)

4. Facilities with multiple process lines that are served by a common control device may monitor the common duct at the entrance to the control device. However, if the facility elects to monitor this single point, the monthly liquid/gas material balance will have to be carried out on all process lines simultaneously.

5. Facilities that use the alternative compliance technique must maintain records of the VOC concentration results and records of production for the affected lines. The records must be reduced so that production conditions can be correlated to VOC concentration records. In addition, records of monthly liquid/gas mass balances must be maintained.

6. Facilities that use the alternative compliance technique must provide advance notice to EPA and the State prior to conducting the monthly liquid/gas material balance testing.

7. Facilities that use the alternative compliance technique must submit reports detailing the VOC concentration monitoring results and monthly liquid/gas material balances. The frequency of reports should be determined based on State implementation plan reporting requirements, other existing reporting requirements for the facility, and any other relevant factors.

7.0 REFERENCES

1. Memorandum and attachments from Seitz, J.S., EPA/SSCD, to Regional Office air division directors. April 16, 1990. Guidelines for developing a State protocol for the measurement of capture efficiency.

2. Office of the Federal Register. Control strategy: Ozone control measures for Cook, DuPage, Kane, Lake, McHenry and Will Counties. 40 CFR 52.741. Washington, DC. U. S. Government Printing Office. 1992.

3. OAQPS. Model Volatile Organic Compound Rules for Reasonably Available Control Technology. U. S. Environmental Protection Agency. Research Triangle Park, NC. June 1992. pp. 340-349.

4. The Measurement Solution: Using a Temporary Total Enclosure for Capture Efficiency Testing. EPA-450/4-91-020. August 1991. Research Triangle Park, NC.

5. Facsimile received August 31, 1993 from Ms. Candace Sorrell, TSD/EMB, to Mr. Stephen Edgerton, MRI. Contains Mr. Robert Stallings, AQMD/OAQPS, recommendations for representative line sampling.

APPENDIX

EMISSION MEASUREMENT TECHNICAL INFORMATION CENTER
GUIDELINE DOCUMENT

Handling Requests for Minor/Major Modifications/Alternative Testing and Monitoring Methods or Procedures Approvals and Disapprovals

The purposes of this guideline are to discuss the Environmental Protection Agency (EPA) alternative testing and monitoring method approval/disapproval procedures and describe EPA procedures for responding to requests to conduct such evaluations. The procedures describe both external and internal procedures and responsibilities associated with EPA's technical assistance and review authority roles.

Background

Sections 111 and 112 of the Clean Air Act, as amended, specify that the Administrator of the EPA has the authority to establish and approve changes to testing and monitoring methods promulgated for determining or assessing compliance of stationary sources with Federally enforceable emission limitations or standards. Many of the Subparts reiterate this authority. The Assistant Administrator for the Office of Air and Radiation has traditionally exercised this authority and delegated some specific technical and implementation issues to the Regional Offices, as appropriate. A 1990 memorandum from the Assistant Administrator for the Office of Administration and Resources Management, approved by the EPA Administrator, clarified the formal delegation authority for NSPS, NESHAP, and Federally-enforceable regulations in State implementation plans (SIP's).

The 1990 memorandum and the delegation document 7-14 of the Delegations Manual (attached) formally clarified that approval of minor changes to testing and monitoring methods and procedures could and would be delegated to the Regional Administrators and the Assistant Administrator for Air and Radiation. Approval of equivalent methods, alternative methods, shorter sampling times and smaller volumes, and waiver of emissions and performance test requirements would be delegated only to the Assistant Administrator for Air and Radiation or a designee. A subsequent memorandum from the Assistant Administrator for Air and Radiation delegated this authority to the Director of the Office of Air Quality Planning and Standards (OAQPS).

There were limitations placed on the delegations:

- The Assistant Administrator for Air and Radiation or a designee must notify the affected Regional Administrators or designees when exercising the authority for approving major changes;

- The Regional Administrators or designees must notify the Assistant Administrator for Air and Radiation or designee when exercising the authority for approval of minor changes;

- The Regional Administrators or designees must request the Assistant Administrator for Air and Radiation or designee to exercise the authority to rule on multi-source cases or cases of national significance. To accomplish this, the Regional Administrators or designees must provide notice by letter to the Assistant Administrator for Air and Radiation or designee of requests for review and disposition of any modification or alternative that is not minor.

In most cases, the Regional Administrators have delegated the authority to approve minor test method changes to the State or local agencies responsible for implementing the NSPS, NESHAP, and federally enforceable SIP's. In October of 1990, John Seitz, Director of the Office of Air Quality Planning and Standards (OAQPS), further delegated responsibility for the authority specified in 7-14 for both minor and major changes to the Directors of the Stationary Source Compliance Division (SSCD) and the Technical Support Division (TSD). In addition, informal legal opinion provided by Regional Counsels and the Office of Enforcement (OE) indicates that disapprovals of "major" modifications to testing and monitoring methods and procedures, or testing waivers must follow the same delegated authority track as approvals.

As further clarification, our understanding is that this delegation should not be applied to programs operated under the Air Quality Management Division (AQMD) Director's discretion (i.e., those completely delegated to State or local agencies with little or no EPA oversight) nor to initial State implementation plan reviews for the permit program or the enhanced monitoring and compliance certification program. For these latter programs, the agency will provide specific guidance on what constitutes acceptable test methods through the regulation or associated guidance material (e.g., the Title IV background documentation and the Enhanced Monitoring Reference Document). Only after an approved program is in place and an alternative method or other method change is proposed should the delegation process be implemented.

Historically, requests for review of alternative testing and monitoring methods or major changes sent to SSCD and TSD and reviewed and either approved or disapproved by the SSCD or TSD Director have generally met the 7-14 criterion above; however, the practice of notifying the SSCD and TSD Directors about minor changes or even major alternative methods or test waiver disapprovals at the Regional, State, or local agency level is not well established or practiced.

Acceptance Criteria

A request for a major change in a testing and monitoring method or procedure and testing waivers will receive rigorous review. Basic principles of these reviews should be:

(a) The change in the testing or monitoring method or procedure will provide a determination of compliance status at the same or higher stringency as the method or procedure specified in the applicable regulation; or

(b) The compliance or conformance with an applicable emission limitation or standard has been sufficiently demonstrated by other means to justify the testing waiver.

In addition, the requester shall include the compelling reasons which prompted the request; that is, a request for any change should address significant deficiencies in applying the prescribed procedure or provide the meaningful improvements achieved over existing procedures or methods. Examples of supporting reasons are as follows:

(a) Overcoming significant interferences or biases (e.g., addition of an HCl-filled impinger to remove NH_3 from an SO_2 gas sample);

(b) Allowing for new technology for improved accuracy, lower cost procedures, or increased applicability (e.g., use of dynamic calibration gas cells for in situ cross-stack continuous emission monitoring systems in lieu of a relative accuracy audit);

(c) Allowing alternative measurement locations for hybrid processes subject to multiple regulations (e.g., alternative measurements and emission calculation procedures for combined cycle, gas turbine/fossil fuel-fired boiler units).

Most importantly, acceptance of an alternative method shall be based on substantive technical support information. While chemistry, engineering, and economic evaluations will be important to the TSD reviews, requests must also include support data of the type described in Method 301 of Appendix A, Title 40

Part 63. The promulgation of Method 301 included the requirement that any non-validated method proposed for demonstrating conformance with a federal emission limitation or standard be subject to the requirements in Method 301. Supporting information includes:

(a) direct comparisons with existing reference or compliance test methods;

(b) precision and bias determinations (e.g., duplicate test trains and multiple test runs under a range of test conditions); and

(c) detailed and documented test procedures (e.g., similar to published EPA reference methods).

Questions regarding these procedures should be directed to and reviewed with Peter Westlin (919/541-1058), Anthony Wayne (919/541-3576), or Robin Segall (919/541-0893).

DRAFT CAPTURE EFFICIENCY TEST METHODS

(as referenced in 12/29/92 Federal Register)

Department of
Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 8, 1994

Ms. Jewell A. Harper, Chief
Air Enforcement Branch
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Dear Ms. Harper:

As required by the FY 94 Section 105 PSD/NSR Workplan Item #13, please find enclosed a copy of the public notice and proposed permit for D-Graphics issued by the DEP Bureau of Air Regulation. This is for a synthetic minor source modification in Duval County. Please retain for your records because it has been indicated to us that the company will be submitting a major modification application as soon as this project is completed. If you have any questions or comments, please contact me at (904)488-1344.

Sincerely,

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

CHF/pa

Enclosures

cc: John Bunyak, NPS

BEST AVAILABLE COPY

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

FAX TRANSMITTAL SHEET

TO: Bob Williams

DATE: 11-8-94 PHONE: 904-733-4381

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 3

FROM: Brad Mitchell / John Brown

DIVISION OF AIR RESOURCES MANAGEMENT

COMMENTS: PN for the fryer. We are providing a copy of this notice with the understanding that, if we do not resolve the permitting and enforcement issues today, that you will call the newspaper and pull this notice.

MESSAGE CONFIRMATION NOV-08-'94 TUE 11:25

TERM ID: F-9999

TEL NO:

NO.	DATE	ST.TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
055	11-08	11:23	00°02'05	904 733 4381		03	00

PHONE: _____ FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.

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

AC 16-259725

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, for a modification to increase the allowable emissions of volatile organic compounds (VOCs) for Press #5. The modification request was for an increase of 39.9 tons/year (TPY) of VOCs, which will result in an annual allowable emission limit of 130.5 TPY of VOCs for Press #5. The limit is for a calendar year (January 1 through December 31). Press #5 is subject to the requirements and conditions of a determination of Lowest Achievable Emission Rate, which was issued at an earlier permitting action.

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. ~~Clair~~ 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.

11-8-94 C. H.
@ 11:35 closed over the phone
w Bob Williams RA

Fold at line over

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 Mgr.
D-Graphics
Division of Jefferson Smurfit Corp
3389 Powers Avenue
Jacksonville, Florida 32231

4a. Article Number
Z 751 859 999

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

7. Date of Delivery

5. Signature (Addressee)
Andrea Dowell

6. Signature (Agent)

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

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

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

Z 751 859 999

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 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: 11/8/94 Jefferson Smurfit Corp.	

PS Form **3800**, March 1993

BEST AVAILABLE COPY

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

FAX TRANSMITTAL SHEET

TO: Terry Cole

DATE: 11-7-94 PHONE: [redacted] 877-0981

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 2

FROM: Bruce Mitchell
DIVISION OF AIR RESOURCES MANAGEMENT

COMMENTS: D-Graphics - C.H. Fancy letter

MESSAGE CONFIRMATION NOV-07-'94 MON 17:52

TERM ID: P-9995

TEL NO:

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
051	11-07	17:50	00'01'17	904 877 0981		02	00

PHONE: [illegible] FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 7, 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:

The Department reviewed your application of October 26 for a construction permit to extend the annual hours of operation for Press #5. Please provide a response to the following questions.

1) Has the air handling system for Press #5 been properly balanced since Press #4 was disassembled?

2) There have been recent allegations that the source has been bypassing the incinerator. What action has been taken to correct this, if the allegations are in fact correct?

Upon receipt of the above information, the Department will proceed with review of your application.

Sincerely,

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

CHF/JB/pm

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

BEST AVAILABLE COPY

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

FAX TRANSMITTAL SHEET

TO: Steve Pace

DATE: 11/2/94 PHONE: _____

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 8

FROM: Charles Logan

DIVISION OF AIR RESOURCES MANAGEMENT

COMMENTS: Draft AC- Permit for D-Graphics

MESSAGE CONFIRMATION NOV-02-'94 WED 17:03

TERM ID: P-9999

TEL NO:

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	ON	NG
997	11-02	16:58	00'05'35	9046303638		08	00

PHONE: _____ FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

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

Permit Number: AC 16-259725
Expiration Date: May 15, 1995
County: Duval
Latitude/Longitude: 30°15'55"N
81°37'18"W
Project: Press No. 5 Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.); Chapters 62-210, 212, 272, 296 and 297, Florida Administrative Code (F.A.C.); and, Chapter 62-4, F.A.C. The above named permittee is hereby authorized to perform the work or operate the facility 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:

For the modification of the existing permit by allowing the applicant to operate the rotogravure printing press No. 5 an additional 1863 hours for a total of 6091 hours per calendar year. The maximum allowable volatile organic compound (VOC) emissions and volatile organic compounds applied to the substrate shall not exceed 130.5 (90.6 + 39.9) tons per calendar year and 178.55 pounds per hour, respectively. The overall capture efficiency, transport system efficiency and destruction efficiency of the emission control system was established in a LAER determination pursuant to Rule 62-212.500(4), F.A.C.

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

Attachments are listed below:

1. Application to modify the air construction permit received on October 26, 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 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

GENERAL CONDITIONS:

auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

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

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

c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

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

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

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source

GENERAL CONDITIONS:

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

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

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Compliance with New Source Performance Standards (NSPS)
(X) Determination of Lowest Achievable Emission Rate (LAER)

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application

GENERAL CONDITIONS:

for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. This permit supersedes construction permit No. AC 16-089528.

2. The hours of operation for Press No. 5 shall not exceed 6091 hours per calendar year (January 1 through December 31) of run time.

3. The maximum allowable volatile organic compounds (VOC) applied to the substrate shall not exceed 178.55 pounds per hour and the maximum allowable VOC emissions shall not exceed 130.5 tons per calendar year.

4. The source is subject to the emission standards established through a determination of LAER, which requires 80% overall capture and transport efficiency of the VOC delivered to the substrate and 95% total destruction of all VOC delivered to the inlet of the catalytic incinerator. The total allowable VOC emissions for the Press No. 5 shall not exceed 130.5 tons per calendar year.

5. Capture efficiency shall be demonstrated using the procedures specified in Rule 62-297.450, F.A.C. A pre-compliance test meeting shall be scheduled with Duval County Regulatory and Environmental

SPECIFIC CONDITIONS:

Services Department (R&ESD) at least 15 days prior to the compliance test to ensure that proper testing procedures will be followed.

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

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

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

9. The use of all coatings and solvents shall be recorded daily. Accounting of VOC emissions shall be verifiable on a 24-hour basis and shall be reported on a monthly basis in a quarterly report. The report shall be provided to the Duval County's R&ESD. The quarterly reports shall be submitted by the 15th day after the end of the quarter (January-March, April-June, July-September, and October-December).

10. The permittee shall, within 10 days of issuance of this permit, withdraw the permit application for modification of Presses No. 4 and No. 5, which was submitted on August 10, 1994.

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

12. The permittee shall, concurrent with any future modification (physical change in operation or method of operation at the facility that results in any increase in emissions of any air pollutant), configure the existing Press No. 5 and any other presses being installed to ensure 100% capture of all VOC emissions. No operation of the modified system shall be allowed in the new configuration without total enclosure as described above.

13. In the event that no further modifications are made to the facility, the permittee shall take action to effect total enclosure

SPECIFIC CONDITIONS:

(to ensure 100% capture of all VOC emissions) not later than June 30, 1996.

14. The permittee shall, independent of any future LAER or BACT determination(s), ensure that the destruction of VOC from the capture system shall meet the capture efficiency requirements of Specific Condition No. 4 (80% capture/transport and 95% destruction) or better.

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

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

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

Issued this _____ day
of _____, 1994

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

_____
Virginia B. Wetherell, Secretary

AC16-259725

Florida Department of Environmental Regulation

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

RECEIVED
OCT 26 1994
Bureau of Air Regulation

DER Application No. ______ (Filled in by DER)

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Rotogravure Printing Press [ ] New[1] [X] Existing[1]

APPLICATION TYPE: [ ] 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: 10-25-94 Telephone No. 904-733-4020

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

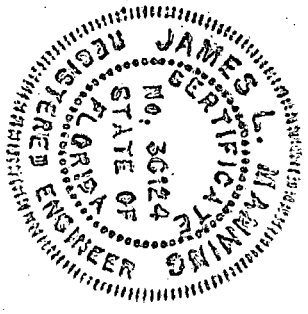
This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance,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

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

DER Form 17-1.202(1)
Effective October 31, 1982

Northwest District, 160 Governmental Center, Pensacola, Florida 32501-5794, 904-436-8300 | Northeast District, 3426 Bills Rd., Jacksonville, Florida 32207, 904-798-4200 | Central District, 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767, 407-894-7555 | Southwest District, 4520 Oak Fair Blvd., Tampa, Florida 33610-7347, 813-623-5561 | South District, 2269 Bay St., Fort Myers, Florida 33901-2896, 813-332-2667 | Southeast District, 1900 S. Congress Ave., Suite A, West Palm Beach, Florida 33406, 407-964-9668

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. 32211
Mailing Address (Please Type)

Florida Registration No. 36124 Date: 10-25-94 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.

Modify specific condition #1 of permit to construct #AC16-089528 to increase the run hours to 6765 hours/year

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

Start of Construction Upon Approval Completion of Construction

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.)

N/A

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

AC16-089528

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 three shifts, 5-7 days per week, 52 weeks per year, with appriximately 20% downtime for cylinder changes, re-webbing, 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. VOC

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. _____

3. Does the State "Prevention of Significant Deterioriation" (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? NO

   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.

See final determination in original construction application

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		

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	
VOC	See Attached Calculations						

[1]See Section V, Item 2.

[2]Reference 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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*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.

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

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

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ 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 Diamter: _____ 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

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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 _____( ) SO^{2}* _____ 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.

CALCULATIONS

D-Graphics
Press #5

Actual emissions:

1992 - (33.7 lb/hr) (4,228 hr/yr) (ton/2,000 lb) = 71.2 tons/yr

1993 - (29.2 lb/hr) (4,228 hr/yr) (ton/2,000 lb) = 61.7 tons/yr

Average = $\frac{(71.2 + 61.7)}{2}$ = **66.5** tons/yr

Proposed allowable emissions:

(66.5 + 39.9) tons/yr = **106.4** tons/yr

Proposed allowable hours of run time:

(106.4 / 66.5) (4,228 hr/yr) = **6,765 hours/year**

AES APPLIED ENVIRONMENTAL SERVICES

570 Northwest Hwy., Suite 9
Des Plaines, IL 60016

1-708-699-9750
1-708-699-8705 fax

REPORT ON
VOC CONTROL SYSTEM
CAPTURE AND DESTRUCTION EFFICIENCY

PREPARED FOR
D-GRAPHICS
JACKSONVILLE, FLORIDA

July 23, 1992

RESULTS

TABLE 1-SUMMARY OF RESULTS
CAPTURE AND DESTRUCTION EFFICIENCY TESTING
June 18, 1992

INCINERATOR INLET	Run 1	Run 2	Run 3	Average
Gas Flow Rate				
acfm	9444		9401	
scfm	8485		8391	8438
Total Hydrocarbons (ppmw Propane Basis)	1028	1063	1076	
Methane (ppm)	36.1*	36.3	35.8	
lb solvent/hr (measured)**	131.2	135.7	137.4	
lb solvent/hr (process)	165.3	166.5	166.7	
Capture Efficiency	79.4	81.5	82.4	81.1

INCINERATOR OUTLET	Run 1	Run 2	Run 3	Average
Gas Flow Rate				
acfm	13248		12842	
scfm	8558		8166	8362
Total Hydrocarbons (ppmw Propane Basis)	33.2	34.0	32.8	
Methane (ppm)	45.8	46.1	43.2	
lb solvent/hr (measured)**	2.28	2.36	2.34	
Destruction Efficiency	98.3	98.3	98.3	98.3
Overall System Efficiency	78.0	80.1	81.0	79.7

* - Sample bag leaked in transit, average of runs 2 and 3
** - Mass emission based on average of initial and final velocity traverses

AES

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REPORT ON
VOC CONTROL SYSTEM
CAPTURE AND DESTRUCTION EFFICIENCY

PREPARED FOR
D-GRAPHICS
JACKSONVILLE, FLORIDA

August 2, 1993

RESULTS

TABLE 1-SUMMARY OF RESULTS
CAPTURE AND DESTRUCTION EFFICIENCY TESTING
June 23, 1993

INCINERATOR INLET	Run 1	Run 2	Run 3	Average
Gas Flow Rate				
acfm	9382		9567	
scfm	8430		8598	8514
Total Hydrocarbons (ppmw Propane Basis)	2685	2719	2714	
Methane (ppm)	22	24	14	
lb solvent/hr (measured)*	140.6	142.3	142.2	
lb solvent/hr (process)	163.1	167.0	166.6	
Capture Efficiency	86.2	85.2	85.4	85.6

INCINERATOR OUTLET	Run 1	Run 2	Run 3	Average
Gas Flow Rate				
acfm	12845		12963	
scfm	8472		8533	8503
Total Hydrocarbons (ppmw Propane Basis)	58.8	61.7	59.8	
Methane (ppm)	31	23	26	
lb solvent/hr (measured)*	5.1	5.5	5.3	
Destruction Efficiency	96.4	96.1	96.3	96.3
Overall System Efficiency	83.1	81.9	82.2	82.4

* - Mass emission based on average of initial and final velocity traverses

AES

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G. DOUG DUTTON
ENVIRONMENTAL CONSULTANTS
(NOT MEMBERS OF THE FLORIDA BAR)

October 25, 1994

BY HAND DELIVERY

Ms. Patty Adams
Florida DEP - Air Office
111 South Magnolia
Tallahassee, Florida 32301

RE: D-Graphics - Permit Processing Fee

Dear Ms. Adams:

Attached is a check in the amount of $2,000 payable to the Florida Department of Environmental Protection in payment of D-Graphics permit processing fee. Please do not hesitate to contact me, should you have any questions.

Sincerely,

Terry Cole

Terry Cole

Attachment: $2,000.00 check

Cole\D-Graphics\Adams10.25/kmp

D-GRAPHICS
DIVISION OF
JEFFERSON SMURFIT CORP.
3389 Powers Avenue
Jacksonville, Florida 32207
TELEFAX NUMBER: 904-733-4381
TELEPHONE NUMBER: 904 733 4020

10-25-94
1:35 pm

FROM: Bob Williams - JSC

TO: Pat Adams, DEP (AIR)

6 PAGES ARE BEING TRANSMITTED EXCLUDING COVER SHEET

MESSAGE:

Confirming our telephone conversation today, I am transmitting our application for minor permit modification for procon #5, PC 16-089528.

Terry Cole's office will deliver a $2,000 check for the permit fee.

I will personally deliver the original copy to your office at 8 AM tomorrow.

Thank you.

Bob Williams

JEFFERSON SMURFIT CORPORATION
D-GRAPHICS DIVISION

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

October 25, 1994

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: Application for Minor Modification
Press #5, AC16-089528

Dear Mr. Fancy:

Please accept this letter as an official application for a minor modification to Permit to Construct #AC16-089528 (Permit) for Press #5 at our facility in Jacksonville, Florida.

Because Press #5 is the only operating press at the facility at this time, and because of anticipated steady growth in customer demands, it is critical that D-Graphics have an increase in the allowable hours of annual run time. Currently, Press #5 is limited to 4,228 hours of run time per year by Specific Condition 1. of the Permit. We request an increase to 6,765 hours per year.

As demonstrated by the attached calculations, an increase to this number of hours will result in an increase in actual, annual VOC emissions of 39.9 tons, which is below the Significant Emission Rate for VOC in Table 212.400-2, F.A.C.. These calculations are based on the results of annual compliance tests conducted in 1992 and 1993, and a copy of the summary pages of the reports are attached.

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

Sincerely,

Douglas Turner
Plant Manager

Enclosures

cc: Mr. Chris Kirts, P.E., FDEP, Northeast District
Mr. Steve Pace, P.E., RESD
Mr. James L. Manning, P.E.
Mr. Terry L. Cole, Attorney at Law

CALCULATIONS

D-Graphics
Press #5

Actual emissions:

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Average = $\frac{(71.2 + 61.7)}{2}$ = 66.5 tons/yr

Proposed allowable emissions:

(66.5 + 39.9) tons/yr = 106.4 tons/yr

Proposed allowable hours of run time:

(106.4 / 66.5) (4,228 hr/yr) = 6,765 hours/year

AES APPLIED ENVIRONMENTAL SERVICES

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Des Plaines, IL 60016

1-708-699-9750
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REPORT ON
VOC CONTROL SYSTEM
CAPTURE AND DESTRUCTION EFFICIENCY

PREPARED FOR
D-GRAPHICS
JACKSONVILLE, FLORIDA

August 2, 1993

RESULTS

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* - Mass emission based on average of initial and final velocity traverses

AES

AES APPLIED ENVIRONMENTAL SERVICES

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REPORT ON
VOC CONTROL SYSTEM
CAPTURE AND DESTRUCTION EFFICIENCY

PREPARED FOR
D-GRAPHICS
JACKSONVILLE, FLORIDA

July 23, 1992

RESULTS

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* - Sample bag leaked in transit, average of runs 2 and 3
** - Mass emission based on average of initial and final velocity traverses

AES

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: Bruce Mitchell

17 PAGES ARE BEING TRANSMITTED EXCLUDING COVER SHEET

MESSAGE:

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.
(Page # of)

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Rotogravure Printing Press [ ] New[1] [X] Existing[1]

APPLICATION TYPE: [ ] 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: 10-25-94 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. 32211
Mailing Address (Please Type)

orida Registration No. 36124 Date: 10-25-94 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.

Modify specific condition #1 of permit to construct #AC16-089528

to increase the run hours to 6765 hours/year

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

Start of Construction Upon Approval Completion of Construction

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.)

N/A

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

AC16-089528

Best Available Copy

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 three shifts, 5-7 days per week, 52 weeks per year, with appriximately 20% downtime for cylinder changes, re-webbing, 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. VOC
2. Does best available control technology (BACT) apply to this source? If yes, see Section VI.
3. Does the State "Prevention of Significant Deterioriation" (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? NO

   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.

See final determination in original construction application

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

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

scription	Contaminants Type	Contaminants % Wt	Utilization Rate - lbs/hr	Relate to Flow Diagram

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)

ame of ntaminant	Emission[1] Maximum lbs/hr	Emission[1] Actual T/yr	Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission lbs/yr	Potential[4] Emission T/yr	Relate to Flow Diagram
	See Attached Calculations						

Section V, Item 2.

rence 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)

ulated from operating rate and applicable standard.

sion, 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)

Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

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

l Analysis:

cent Sulfur: _____ Percent Ash: _____

ality: _____ lbs/gal Typical Percent Nitrogen: _____

Capacity: _____ BTU/lb _____ BTU/gal

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

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

ual Average _____ Maximum _____

Indicate liquid or solid wastes generated and method of disposal.

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

ck Height: _____ ft. Stack Diameter: _____ ft.

Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

er Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

pe of aste	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.)
tual /hr iner- ted							
con- olled s/hr)							

ription of Waste _____

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

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

facturer _____

Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel Type	Fuel BTU/hr	Temperature (°F)
mary Chamber					
ondary Chamber					

k Height: _____ ft. Stack Diamter: _____ Stack Temp. _____

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

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

of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner

[ ] Other (specify) _____

f description of operating characteristics of control devices: _____

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

se provide the following supplements where required for this application.

Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

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.

Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

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.)

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).

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.

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).

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.

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

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

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

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

Contaminant	Rate or Concentration

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

1. Control Device/System:
2. Operating Principles:
3. Efficiency:*
4. Capital Costs:

ain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height: ft. b. Diameter: ft.

c. Flow Rate: ACFM d. Temperature: °F.

e. Velocity: FPS

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:

xplain method of determining efficiency.
nergy 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:

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:

plain method of determining efficiency.
ergy 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:

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

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

Company Monitored Data

1. _____ no. sites _____ TSP _____ ( ) SO^{2}* _____ 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.

pecify 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

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)_____

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.

Applicants Maximum Allowable Emission Data

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

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.

Attach all other information supportive to the PSD review.

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.

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.

CALCULATIONS

D-Graphics
Press #5

Actual emissions:

1992 - (33.7 lb/hr) (4,228 hr/yr) (ton/2,000 lb) = 71.2 tons/yr

1993 - (29.2 lb/hr) (4,228 hr/yr) (ton/2,000 lb) = 61.7 tons/yr

Average = $\frac{(71.2 + 61.7)}{2}$ = 66.5 tons/yr

Proposed allowable emissions:

(66.5 + 39.9) tons/yr = 106.4 tons/yr

Proposed allowable hours of run time:

(106.4 / 66.5) (4,228 hr/yr) = 6,765 hours/year

AES APPLIED ENVIRONMENTAL SERVICES

570 Northwest Hwy., Suite 9
Des Plaines, IL 60016

1-708-699-9750
1-708-699-8705 fax

REPORT ON
VOC CONTROL SYSTEM
CAPTURE AND DESTRUCTION EFFICIENCY

PREPARED FOR
D-GRAPHICS
JACKSONVILLE, FLORIDA

July 23, 1992

RESULTS

TABLE 1-SUMMARY OF RESULTS
CAPTURE AND DESTRUCTION EFFICIENCY TESTING
June 18, 1992

INCINERATOR INLET	Run 1	Run 2	Run 3	Average
Gas Flow Rate				
acfm	9444		9401	
scfm	8485		8391	8438
Total Hydrocarbons (ppmw Propane Basis)	1028	1063	1076	
Methane (ppm)	36.1*	36.3	35.8	
lb solvent/hr (measured)**	131.2	135.7	137.4	
lb solvent/hr (process)	165.3	166.5	166.7	
Capture Efficiency	79.4	81.5	82.4	81.1

INCINERATOR OUTLET	Run 1	Run 2	Run 3	Average
Gas Flow Rate				
acfm	13248		12842	
scfm	8558		8166	8362
Total Hydrocarbons (ppmw Propane Basis)	33.2	34.0	32.8	
Methane (ppm)	45.8	46.1	43.2	
lb solvent/hr (measured)**	2.28	2.36	2.34	
Destruction Efficiency	98.3	98.3	98.3	98.3
Overall System Efficiency	78.0	80.1	81.0	79.7

* - Sample bag leaked in transit, average of runs 2 and 3
** - Mass emission based on average of initial and final velocity traverses

AES

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REPORT ON
VOC CONTROL SYSTEM
CAPTURE AND DESTRUCTION EFFICIENCY

PREPARED FOR
D-GRAPHICS
JACKSONVILLE, FLORIDA

August 2, 1993

RESULTS

TABLE 1-SUMMARY OF RESULTS
CAPTURE AND DESTRUCTION EFFICIENCY TESTING
June 23, 1993

INCINERATOR INLET	Run 1	Run 2	Run 3	Average
Gas Flow Rate				
acfm	9382		9567	
scfm	8430		8598	8514
Total Hydrocarbons (ppmw Propane Basis)	2685	2719	2714	
Methane (ppm)	22	24	14	
lb solvent/hr (measured)*	140.6	142.3	142.2	
lb solvent/hr (process)	163.1	167.0	166.6	
Capture Efficiency	86.2	85.2	85.4	85.6

INCINERATOR OUTLET	Run 1	Run 2	Run 3	Average
Gas Flow Rate				
acfm	12845		12963	
scfm	8472		8533	8503
Total Hydrocarbons (ppmw Propane Basis)	58.8	61.7	59.6	
Methane (ppm)	31	23	26	
lb solvent/hr (measured)*	5.1	5.5	5.3	
Destruction Efficiency	96.4	96.1	96.3	96.3
Overall System Efficiency	83.1	81.9	82.2	82.4

* - Mass emission based on average of initial and final velocity traverses

AFS