

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 14, 1993

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Carl W. Zielke
V.P. & Division Director
R. R. Donnelley & Sons Co.
3100 S. Ridgewood Ave.
South Daytona, Florida 32119-3548

Dear Mr. Zielke:

Re: Amendment to Construction Permit No. AC 64-188871

The Department has reviewed the comments made in Mr. Mark Horne's letter with enclosure received on January 11, 1993. Based on the comments, the following shall be changed and/or added:

A. AC 64-188871: SPECIFIC CONDITIONS

a. No. A.3.:

FROM: The initial and subsequent demonstration of the capture efficiency of each dryer enclosure shall be conducted using the U.S. EPA's VOC Capture Efficiency Test Procedure pursuant to F.A.C. Rule 17-297.450. The permittee shall notify the Department's Central District in writing of the protocol that will be used for the capture efficiency demonstration at least 60 days prior to compliance testing. However, the requirements of this condition are not applicable as long as high molecular weight alcohol substitutes are being used.

TO: The initial and subsequent demonstrations of the capture efficiency of each dryer enclosure shall be conducted using the U.S. EPA's VOC Capture Efficiency Test Procedure pursuant to F.A.C. Rule 17-297.450. The permittee shall notify the Department's Central District in writing of the protocol that will be used for the capture efficiency demonstration at least 60 days prior to compliance testing. However, the requirements of this condition are not applicable as long as low volatility alcohol substitutes are being used, such as ethylene glycol and ethylene glycol n-butyl ether (butyl cellosolve).

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b. No. A.7.:

FROM: The Permittee shall maintain a rolling 3-hour average combustion temperature of 1,350°F at the point of incineration in the afterburner whenever any or all of the press systems (SDM-001, SDM-002, and SDM-003) are in operation. For the purposes of this permit, an hour shall be each period of sixty consecutive minutes.

TO: The Permittee shall maintain a rolling 3-hour average combustion temperature of at least 1,350°F at the control point of the afterburner whenever any or all of the press systems (SDM-001, SDM-002, and SDM-003) are in operation. For the purposes of this permit, an hour shall be each period of sixty consecutive minutes.

c. No. A.8.:

FROM: The permittee shall install, calibrate, maintain, and operate a device that continuously measures and records the combustion temperature at the point of incineration in the afterburner.

TO: The permittee shall install, calibrate, maintain, and operate a device that continuously measures and records the combustion temperature at the control point of the afterburner.

c. No. A.10.:

FROM: Pursuant to F.A.C. Rule 17-210.700, the Permittee shall submit a full written quarterly report to the the Department's Central District when:

- o one or more press systems were operating and the rolling 3-hour average temperature was less than 1,350°F, the cause of the low temperature, and the corrective actions taken; and,
- o the KATEC thermal oxidizer's VOC input rate exceeded its maximum manufacturer's design capacity and the temperature exceeded 1500°F; and, the corrective actions taken.

TO: Pursuant to F.A.C. Rule 17-210.700, the Permittee shall submit a full written quarterly report to the the Department's Central District when:

- o one or more press systems were operating and the rolling 3-hour average temperature was less than 1,350°F, the cause of the low temperature, and the corrective actions taken; or,

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- o the KATEC thermal oxidizer's VOC input rate exceeded its maximum manufacturer's design capacity and the temperature exceeded 1500°F; and, the corrective actions taken.

B. Attachment to be Incorporated:

- o Mr. Mark Horne's letter with enclosure received January 11, 1993.

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. Petitions filed by the amendment 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 Amendment File Number(s) 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

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decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of 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.

This letter amendment must be attached to the construction permit, No. AC 64-188871, and shall become a part of the permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/RBM/rbm

Attachment

cc: C. Collins, CD
D. Beason, Esq., DER
M. Horne, RRD&SC

The Lakeside Press
R·R·DONNELLEY & SONS COMPANY

750 WARRENVILLE ROAD
LISLE, ILLINOIS 60532
708-963-9494

RECEIVED

JAN 11 1993

Division of Air
Resources Management

January 8, 1993



Mr. Clair H. Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Reference: Letter from Mr. Howard L. Rhodes to Mr. Carl W. Zielke,
dated December 24, 1992 - Amendment to Construction Permit
No. AC 64-188871

Dear Mr. Fancy:

As discussed with Mr. Bruce Mitchell of your office, we request that the permit conditions contained in the above referenced letter be amended as described below. Please note that deletions are depicted as strike-throughs, while additions are underlined and bolded. The purpose of these amendments is to reflect the current language of Specific Condition A.3 (as amended June 4, 1991), and to improve the clarity of Specific Conditions A.7, A.8, and A.10. The requested amendments are as follows:

A. AC 64-188871: SPECIFIC CONDITIONS

a. No. A.3.:

The initial and subsequent demonstrations of the capture efficiency of each dryer enclosure shall be conducted using the U.S. EPA's VOC Capture Efficiency Test Procedure pursuant to F.A.C. Rule 17-297.450. The permittee shall notify the Department's Central District in writing of the protocol that will be used for the capture efficiency demonstration at least 60 days prior to compliance testing. However, the requirements of this condition are not applicable as long as ~~high molecular weight~~ low volatility alcohol substitutes are being used, such as ethylene glycol and ethylene glycol n-butyl ether (butyl cellosolve).

e. No. A.7.:

The Permittee shall maintain a rolling 3-hour average combustion temperature of at least 1,350°F at the control point of ~~incineration in~~ the afterburner whenever any or all of the press systems (SDM-001, SDM-002 and SDM-003) are in operation. For the purposes of this permit, an hour shall be each period of sixty consecutive minutes.

f. No. A.8.:

The permittee shall install, calibrate, maintain, and operate a device that continuously measures and records the combustion temperature at the control point of ~~incineration in~~ the afterburner.

h. No. A.10.:

Pursuant to F.A.C. Rule 17-210.700, the Permittee shall submit a full written quarterly report to the Department's Central District when:

- o one or more press systems were operating and the rolling 3-hour average temperature was less than 1,350°F, the cause of the low temperature, and the corrective actions taken; ~~and~~ or,
- o the KATEC thermal oxidizer's VOC input rate exceeded its maximum manufacturer's design capacity and the temperature exceeded 1500°F; and, the corrective actions taken.

If there are any questions, please call me at (708) 719-6755.

Sincerely,

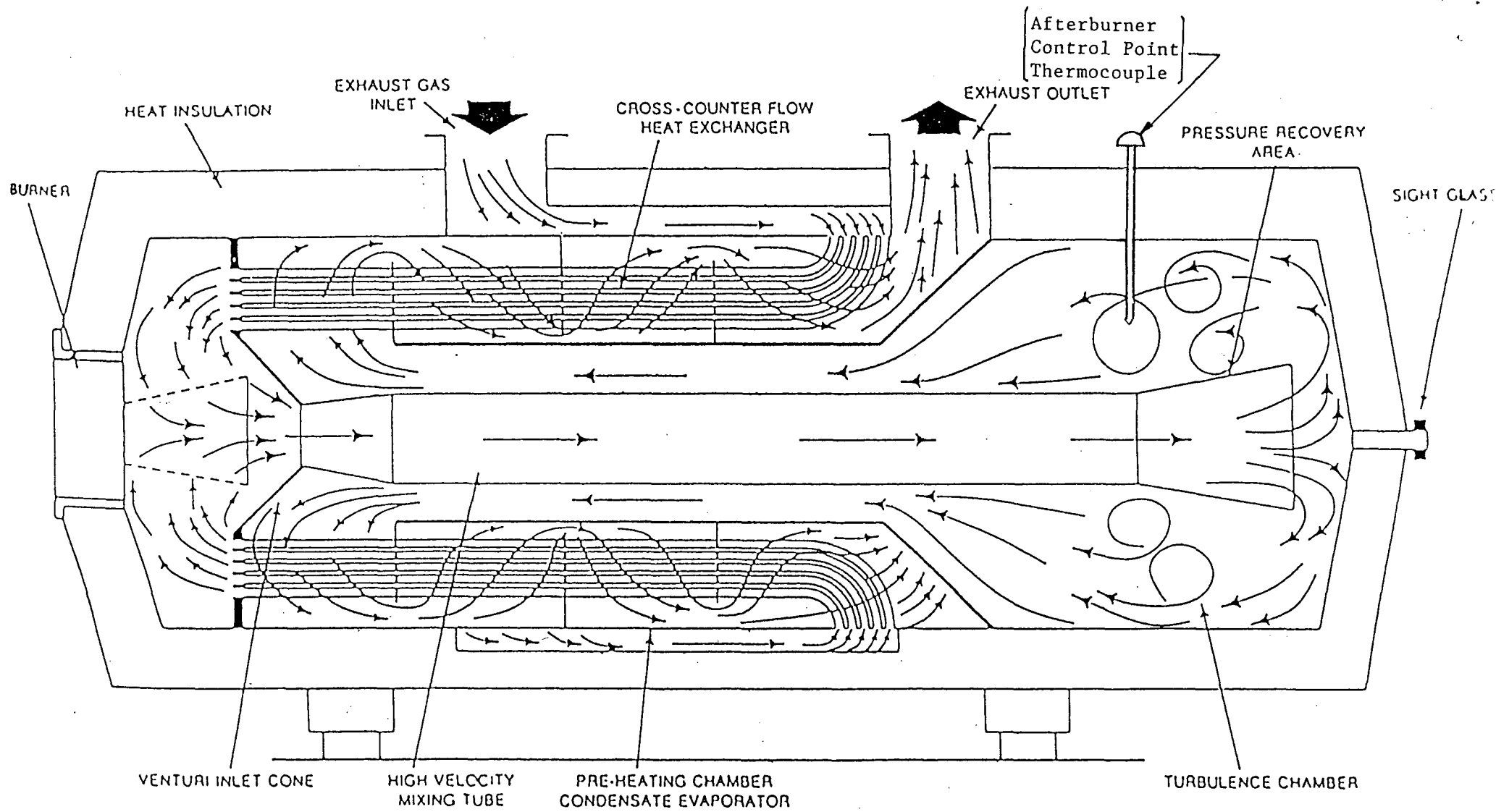
R.R. DONNELLEY & SONS COMPANY



Mark A. Horne
Environmental Engineer

MAH:mh
FDER5

cc: C. Collins, FDER
B. Mitchell, FDER
G. Bender
H. Britton
D. Hiler
C. Zielke



Recuperative-Type Thermal Afterburner