STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF PERMIT

In the matter of an Application for Permit by:

DEP File No. AC 16-234532 Duval County

Mr. Hollis H. Elder Vice President and General Manager Jefferson-Smurfit Corporation Post Office Box 150 Jacksonville, FL 32201

Enclosed is Permit Number AC 16-234532 to increase maximum heat input to the No. 10 Boiler at your facility located at 1915 Wigmore Street, Jacksonville, Florida. 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 CE OF PERMIT and all copies were mailed before the close of business on 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.

DULLULUS

Copies furnished to:

J. Cole, NED R. Roberson, AQD RESD (Duval Co.)
G. Tonn, JSC

J. Manning, P.E., JMC
R. Caleen, O&H
J. Harper, U.S. EPA
G. Worley, U.S. EPA
J. Bunyak, NPS
B. Collom GAPC

B. Collom, GAPC

in 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 the return this card to you. Attach this form to the front of alemailpiece or on the back does not permit. Write "Return Receipt Requested" on the mailpiece below the ant. The Return Receipt will show to who the additivered additivered.	if space ticle number.		Receipt Service
ADDRESS completed on	3. Article Addressed to: Air Regulation Mr. Hollis H. Elder Vice President and General Manag Jefferson-Smurfit Corporation	P 8 e4tb. Ser □ Regis XX Certi □ Expr	icle Number 372 562 724 vice Type stered ☐ Insured	ou for using Return Re
your RETURN	5. Signature (Addressee) 6. Signature (Agent) PS Form 3811, December 1991 *U.S. GPO: 1992—32	and j	essee's Address (Only if requested . tee is paid)	Thank y

P 872 562 724



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

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Ī	P.O., State and ZIP Code Jacksonville, F	
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	Restricted Delivery Fee	
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S Form 3800, JUNE 1991	TOTAL Postage & Fees	\$
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S Fo	AC 16-234532	

Final Determination

Jefferson Smurfit Corporation Duval County Jacksonville, Florida

Construction Permit No. AC 16-234532

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

Final Determination

Jefferson Smurfit Corporation

AC 16-234532

The construction permit application package and supplementary material have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Florida Times-Union on March 3, 1994. The Technical Evaluation and Preliminary Determination (TE&PD) were distributed on February 18 and were made available for public inspection at the Department's Northeast District and Bureau of Air Regulation offices and the City of Jacksonville's Regulatory & Environmental Services Department (RESD).

Comments were received from the City of Jacksonville's Regulatory and Environmental Services Department and the National Park Service (NPS). The Department's responses (numbered to correspond to each comment) and the changes or new language are as follows:

RESD comments (Richard Robinson's letter dated March 7, 1994);

- 1. A Modification for New Source Performance Standards (NSPS) is defined in paragraph (a) of 40 CFR 60.14 which states that "Except as provided under paragraphs (e) and (f) of this section, any physical change or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification within the meaning of section 111 of the Act". Paragraph (e) of 40 CFR 60.14 states that "The following shall not, by themselves, be considered modifications under this part". The only applicable subparagraph of 40 CFR 60.14 (e) is (2) which states that "An increase in production rate of an existing facility, if that increase can be accomplished without a capital expenditure on that facility" is not considered a modification. Therefore, the Department has determined that the subject request is not a modification. The provisions of Subpart D are applicable to and addressed in this permit. All references to "Subpart Db" in the permit were incorrect and are changed to "Subpart D". The "40 CFR 60.44b(b)" in Specific Condition number 9 is deleted.
- 1a. Not applicable since Subpart Db does not apply.
- 1b. Not applicable since Subpart Db does not apply.
- 1c. Verbiage stating that "The facility shall not discharge into the atmosphere gases which exhibit greater than 20 percent opacity except for one six-minute period per hour of not more than 27 percent opacity" is added to Specific Condition number 7.

Jefferson Smurfit Corporation AC 16-234523 May 20, 1994 Page 2 of 2

- 1d. Specific Condition number 9 addresses the determination of NO_X and SO_2 in tons per month.
- 1e. This issue is adequately addressed in Specific Condition
 number 3.
- 1f. Verbiage referencing 40 CFR 60, Appendix F, is added to Specific Condition number 20.

References to 40 CFR 60, Subpart D, in Specific Condition numbers 21, 22 and 24 were correct.

- 2. This comment concerning visible emissions is addressed in response 1c.
- 3. The reference to 40 CFR 60.446(b) in Specific Condition number 9 was deleted.
- 4. The two typographical errors in Specific Condition number 24 have been corrected:
 - o Brown steel washer system reads "brown stock washer system".
 - o 50.284(b)(1) reads "40 CFR 60.284(b)(1)".
- 5. The contemporaneous emission increase for SO₂ is 39 TPY and will be added to Specific Condition number 28.
- 6. Previous PSD and BACT determinations do not exist for this facility.

NPS comments (Warren Old's letter received on March 17, 1994);

Ms. Ellen Porter, National Park Service, raised the question concerning the increase in SO_2 emissions being greater than 40 TPY. The limit in Specific Condition number 5 is incorrect and is changed from 950 TPY to 891 TPY.

No other comments were received.

Therefore, it is recommended that the construction permit, AC 16-234532, be issued as drafted, with the above referenced revisions incorporated.



Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell Secretary

PERMITTEE:

Jefferson Smurfit Corporation

Post Office Box 150

Jacksonville, Florida 32201

Permit No.: AC16-234532 Exp. Date: July 1, 1995

County : Duval

Lat./Long. : 30°22'00"N

81°37'30"W

Project : Increase Maximum

Heat Input to No.

10 Boiler

This permit modification is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-210 through 297 and 17-4. 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 and specifically described as follows:

The permit allows the applicant to increase the maximum heat input of the No. 10 coal/bark power boiler from 441 MMBtu/hour to 540 MMBtu/hour by firing additional bark. The facility may be operated at 8760 hours per year. The facility is located at 1915 Wigmore Street, Jacksonville, Duval County, Florida. UTM coordinates of the site are: Zone 17, 439.500 km E and 3,359.100 km N.

The source shall be modified and operated in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in this permit.

Attachments are listed below:

- 1. Construction Permit Modification Application received on July 16, 1993.
- Incompleteness letter to JSC on August 11, 1993.
- JSC response to incompleteness letter received on September 20, 1993.
- Letter from Fancy to Harper November 29, 1993, requesting guidance on delaying BACT should application be subject to PSD review.
- 5. Technical Evaluation and Preliminary Determination mailed 2/18/94.
- 6. Mr. Richard Robinson's (RESD) letter received 3/14/94.
- 7. Public Notice received on 3/8/94.
- 8. Mr. Warren Old's (NPS) letter received on 3/23/94.
- Final Determination dated 3/30/94.

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Permit Number: AC 16-234532 Expiration Date: July 1, 1995

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, Florida Statutes. 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), Florida Statutes, 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 acknowledgment 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 Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- 6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

Permit Number: AC 16-234532 Expiration Date: July 1, 1995

GENERAL CONDITIONS:

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 arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. 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 Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

Permit Number: AC 16-234532 Expiration Date: July 1, 1995

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, 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
 - (x) Compliance with New Source Performance Standards (NSPS)
- 14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

Permit Number: AC 16-234532 Expiration Date: July 1, 1995

GENERAL CONDITIONS:

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. The allowable NO_X emissions at this facility will be 0.70 lbs/MMBtu, 378 lbs/hr and 1200 TPY until Selective Non Catalytic Reduction (SNCR) controls are operational or for a period not to exceed twelve months after the issuance date of this permit, whichever comes first. After 1000 tons of NO_X have been emitted at the facility, the applicant shall calculate the NO_X emissions at least weekly, to ensure that the facility does not exceed 1200 TPY. The tons per year are determined by the procedures in Specific Condition 9.
- 2. SNCR controls shall be installed and operational at the facility no later than twelve months after the issuance date of this permit.
- 3. The NO_X emissions are limited to 1200 TPY in any consecutive twelve month period. The tons per year are determined by the procedures of Specific Condition 9. Each day of operation, in a twelve consecutive month period, in excess of this 1200 tons limitation will constitute a separate violation.
- 4. After SNCR controls are installed, operational and not less than one year after the issuance date of this permit, the facility will be limited to allowable NO_X emissions of 273.0 lbs/hr, 0.50 lbs/MMBtu and 1200 TPY.
- 5. The allowable SO₂ emissions for the facility are limited to 0.40 lb/MMBtu, 217.0 lb/hr and 891 TPY. The tons per year are determined by the procedures in Specific Condition 9.
- 6. The allowable CO emissions are limited to 65.0 lb/hr and 170.0 TPY.
- 7. The allowable PM/PM $_{10}$ emissions are limited to 0.04 lb/MMBtu, 24.0 lb/hr and 105.0 TPY. The facility shall not discharge into the atmosphere gases which exhibit greater than 20 percent opacity except for one six-minute period per hour of not more than 27 percent opacity.
- 8. The allowable VOC emissions are limited to 38.0 lb/hr and 166.4 TPY.

Permit Number: AC 16-234532 Expiration Date: July 1, 1995

SPECIFIC CONDITIONS:

- 9. The owner and operator shall report monthly emissions of SO_2 and NO_X in tons per month. The reports shall be submitted to the RESD and the Northeast District office by the 15th of each month for the preceding month of operation until the SNCR is operational. SO_2 and NO_X emissions in tons per month, for compliance with the tons per year requirements, shall be determined using CEMS, Method 19 and the actual operating hours. Emissions for periods of CEMS outages in excess of 2% of the operating hours in the month shall be determined by using the highest 24 hour (00:00AM-11:59PM) emissions rate for the period reported.
- 10. Only coal containing less than or equal to 1.0% sulfur by weight and bark shall be fired during normal operating conditions as a combined fuel in this boiler. The maximum heat input from the firing of coal and bark shall not exceed 397.0 MMBtu/hour and 143.0 MMBtu/hour, respectively, for a total maximum heat input from the combined fuel of 540.0 MMBtu/hour. No. 6 fuel oil may be fired during start-up, shut-down and malfunctions. Maximum coal fuel input shall be 30,600 lb/hr. Maximum bark fuel input shall be 35,000 lb/hr.
- 11. Within 30 days after issuance of this permit and again within 30 days after the SNCR becomes operational the applicant shall conduct stack tests, utilizing the methods prescribed in specific condition 12 to determine compliance with the emissions limiting standards for NO_X , PM, VE, and SO_2 . Reports of these tests shall be provided to the RESD and the Department within 45 days after testing.
- 12. The following pollutant(s) shall be tested at intervals indicated.

<u>Pollutant</u>	<u>Interval</u>	*Test Method
Particulate Matter(PM)	12 Months	EPA Reference Method(RM) 5
Visible Emissions(VE)	12 Months	EPA RM 9
Sulfur Dioxide(SO ₂)	12 Months	EPA RM 6
Nitrogen Oxides (NO_X)	12 Months	EPA RM 7/7A
Volatile Organic		•
Compounds (VOC)	60 Months	EPA RM25/25A
Carbon Monoxide(CO)	Upon Request	EPA RM 3

*As described in 40 CFR 60, Appendix A (July 1, 1988)

13. Permittee shall notify the NE District Office and the Local Program at least fifteen (15) days prior to source testing in accordance with Rule 17-297.340(1)(i), Florida Administrative Code (FAC).

Permit Number: AC 16-234532 Expiration Date: July 1, 1995

SPECIFIC CONDITIONS:

- 14. Copies of the test report(s) shall be submitted to the NE District Office and the Local Program (RESD) within forty-five (45) days of completion of testing in accordance with Rule 17-297.570(2), FAC.
- 15. Testing of emissions shall be conducted with the source 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 sources may be tested at less than capacity; in this case subsequent source operation is limited to 110 percent of the test load until a new test is conducted. Once the 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. Control equipment shall be provided with a method of access that is safe and readily accessible.
- 17. Stack sampling facilities shall be required and shall comply with the requirements of Rule 17-297.345, FAC.
- 18. Permittee shall submit an annual operation report to the NE District Office for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-210.900(4), FAC.
- 19. This source may operate continuously, 8760 hours per year.
- 20. Continuous monitoring equipment shall be installed, maintained, calibrated, and operated in accordance with 40 CFR 60.13, 40 CFR 60.45, 40 CFR 60, Appendix B and 40 CFR 60, Appendix F for the following pollutants:
 - (A) Sulfur dioxide
 - (B) Nitrogen oxides
 - (C) Oxygen
- 21. Performance evaluation, calibration checks, and reports shall be performed and submitted in accordance with requirements set forth and/or referenced in 40 CFR 60.45(c), (e), and (f).
- 22. Excess emission reports shall be submitted quarterly (January-March, April-June, July-September, October-December) on or before the 30th days following each quarter to the RESD and NE District Office [in accordance with 40 CFR 60.7(c)] for the following pollutants:
 - (A) Nitrogen oxides
 - (B) Sulfur dioxide

Permit Number: AC 16-234532 Expiration Date: July 1, 1995

SPECIFIC CONDITIONS:

Jefferson Smurfit Corporation shall maintain records of all measurements required by 40 CFR 60.7(d). These records shall be maintained, in a form suitable for inspection for a minimum period of two (2) years.

- 23. For the purpose of this permit, an excess emission is defined in accordance with 40 CFR 60.45(g).
- 24. Jefferson Smurfit Corporation shall combust off-gases from the brown stock washer system (APIS No. 31-16-0003-09) and black liquor oxidation system (APIS No. 31-16-0003-08) in accordance with 40 CFR 60.283(a)(1)(iii). Jefferson Smurfit Corporation shall install, calibrate, and maintain a continuous combustion temperature monitoring device in accordance with 60.284(b)(1).
- 25. Jefferson Smurfit Corporation shall not operate Power Boiler No. 10 without the pollution control devices operating properly.
- 26. Jefferson Smurfit Corporation shall maintain [in accordance with 40 CFR 60.7(b)] records of the duration and occurrence of startups, shutdowns, and malfunctions of Power Boiler No. 10 and associated air pollution control equipment, and any period during which a continuous monitoring system or monitoring device is inoperative. These records shall be provided to the Department's NE District Office and RESD upon request.
- 27. The minimum Venturi pressure drop shall be limited to 10.5 inches of water and the minimum Venturi water flow rate shall be limited to 400 gallons per minute of water. The Venturi pressure drop and flow rate of water shall be continuously recorded on strip charts and these records shall be maintained on file for a minimum of two (2) years.
- 28. For inventory purposes the net contemporaneous emissions change (actual allowable) are increased as follows:

NO_X	36.0	TPY
PM/PM ₁₀	14.4	TPY
VOC	37.4	TPY
SO ₂	39.0	TPY

29. An application for an operation permit must be submitted to the Northeast District office and the AQD-RESD at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the

Permit Number: AC 16-234532 Expiration Date: July 1, 1995

SPECIFIC CONDITIONS:

appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this ______

_ day , 1994

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Howard L. Rhodes

Director

Division of Air Resources

Management

Florida Department of Environmental Protection

TO : Howard L. Rhodes

FROM : Clair H. Fancy (TX)

DATE : May 20, 1994

SUBJECT: Approval of Construction Permit No. AC 16-234532

Jefferson Smurfit Corporation

Attached for your approval and signature is a construction permit prepared by the Bureau of Air Regulation for the above referenced company to increase the maximum heat input to their No. 10 boiler. The facility is located in Jacksonville, Duval County, Florida. This permit will not cause an exceedance of ambient air quality standards. The annual emissions will increase less than the significant emissions rates that would require best available control technology (BACT) determination under the prevention of significant deterioration (PSD) rules. To minimize the annual SO_2 emissions the applicant will burn coal with a sulfur content of less than or equal to 1.0% by weight and will burn bark. The permit requires the applicant to install Selective Non-catalytic Reduction (SNCR) equipment within the first year after the issuance of this permit. This will, when installed, reduce annual NO_X emissions.

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

I recommend your approval and signature.

CHF/CSL

Attachments