



United States Department of the Interior

FISH AND WILDLIFE SERVICE
1875 Century Boulevard
Atlanta, Georgia 30345

IN REPLY REFER TO:

March 17, 1994

RECEIVED

MAR 23 1994

Bureau of
Air Regulation

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

Dear Mr. Fancy:

We have reviewed the Technical Evaluation and Preliminary Determination and proposed permit modification for the No. 10 Power Boiler at Jefferson-Smurfit, Corporation's (JSC) facility in Jacksonville, Florida. The facility is located approximately 58 km southeast of Okefenokee Wilderness Area and 104 km south of Wolf Island Wilderness Area, which are Class I air quality areas administered by the Fish and Wildlife Service.

We understand that Permit Specific Condition No. 5 will be changed to: "The allowable SO₂ emissions for the facility are limited to . . . 891 TPY." We agree that, with this change, the proposed modification is no longer subject to PSD review. Because the proposed emission increases are now insignificant, the potential for impacts at the wilderness areas is low. We are pleased that JSC is installing Selective Non-Catalytic Reduction equipment in 12 months to further reduce NO_x emissions.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you have questions, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at 303/969-2071.

Sincerely yours,

Warren T. Olds, Jr.
Acting Regional Director

cc: C. Logan
A. Cole, NE Dist
R. Robinson, RESD
B. Jones, ISC
J. Manning, A.E.
R. Calver, O+H
G. Harper, EPA

H. Worley, EPA
B. Collins, GA PC

REGULATORY & ENVIRONMENTAL
SERVICES DEPARTMENT
Air Quality Division

March 7, 1994

Mr. Preston Lewis, P.E., Air Permitting Supervisor
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**RE: Jefferson Smurfit Corporation
Modification Permit AC16-234532
No. 10 Boiler**

Dear Mr. Lewis:

The City of Jacksonville, Air Quality Division (AQD) has reviewed the Technical Evaluation and Preliminary Determination, and the proposed modification permit for the Jefferson Smurfit Corp. (JSC) No. 10 Boiler, dated February 18, 1994. The following comments are submitted to the Department for consideration prior to taking final agency action:

1. The Department has determined that 40 CFR 60 Subpart Db is applicable to this source. This determination is referenced in Section IV. Rule Applicability of the Technical Evaluation and Preliminary Determination. This applicability of Subpart Db should be explicitly stated in the permit. The applicability of Subpart Db is referenced in the proposed permit only for reporting requirements of NO_x emissions as determined by a Continuous Emission Monitor (CEM). The proposed permit does not include other requirements in accordance with the provisions of Subpart Db. Requirements not referenced in the proposed permit are as follows:
 - a. 90% reduction of SO₂; 40 CFR 60.42b
 - b. Coal sampling procedures; 40 CFR 60.45b
 - c. Visible emissions limits; 40 CFR 60.43b
 - d. 30 day rolling averages for NO_x and SO₂ emissions
 - e. A specific reference to the use of CEMs for compliance
 - f. A specific reference to 40 CFR 60 Appendix F for CEM quality assurance

Specific Conditions 21, 22, and 24 have references to 40 CFR 60 Subpart D. If Subpart Db is applicable, then these specific conditions should be amended to reflect the applicable requirements.

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MAR 14 1994

Bureau of
Air Regulation



① Copy for Charles Hogan
② Give original to Patty
for other copying & file



Jefferson Smurfit Modification
Permit AC16-234532
No. 10 Boiler
Page 2

2. Regardless of which NSPS Subpart applies, the proposed permit should be amended to include a visible emissions limit.
3. If NSPS Subpart D is applicable, then the reference to 40 CFR 60.44b(b) in Specific Condition 9 should be changed to 40 CFR 60.44(b).
4. Specific Condition 25. contains two typographic errors.
 - a. Brown steel washer system should read brown stock washer system
 - b. 50.284(b)(1) should read 40 CFR 60.284(b)(1)
5. Specific Condition 29. addresses net contemporaneous emissions changes for NO_x, PM/PM₁₀, and VOC. The list does not include SO₂ emissions. Is the absence of SO₂ on this listing an inadvertent omission?
6. AQD recognizes that this modification does not exceed "significant emission rates" and prevention of significant deterioration (PSD) or best available control technology (BACT) are not triggered. However, the proposed permit does not mention or acknowledge the previous PSD or BACT determinations. AQD recommends that the proposed permit include references to the previous PSD (PSD-FL-270) and BACT determinations. If these determinations are no longer valid please explain.

AQD appreciates the opportunity to review and comment on the Technical Evaluation and Preliminary Determination for the proposed modification permit. AQD would also appreciate the Department's comments or decisions regarding AQD's concerns expressed above prior to any final agency action. Please contact Mr. Ronald Roberson or me at (904) 630-3484 if there are any questions or additional information required.

Very truly yours,



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

RLR/nic

cc: Mr. Chris Kirts, DEP/NED
Mr. Wayne Tutt, AQD
AQD File 1750-C
AQD Permitting File

REGULATORY & ENVIRONMENTAL SERVICES DEPARTMENT

① Copy Logan and Lewis

FAX COVER SHEET

② Give to Patty for file and other distribution

AIR QUALITY DIVISION

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

DATE: 3/8/94 TIME: 2:10 PM.

TO: MR. PRESTON LEWIS, P.E. FAX #: 904-922-6979
DEP/DARM/BAR

MESSAGE: ENCLOSED ARE AQD'S COMMENTS
ON THE JEFFERSON SMURFIT NO. 10 BOILER
PERMIT, AC16-234532. PLEASE CALL TO DISCUSS.

FROM: RICHARD ROBINSON, P.E.

NUMBER OF PAGES FAXED (including cover): 3

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



JEFFERSON SMURFIT CORPORATION

March 3, 1994

Containerboard Mill Division

1915 WIGMORE STREET

P. O. BOX 150

JACKSONVILLE, FL 32201

TELEPHONE: 904/353-3611

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

RECEIVED

MAR 8 1994

Bureau of
Air Regulation

RECEIVED
MAIL ROOM
MAR - 7 PM 2:23

SUBJECT: PROPOSED AIR PERMIT MODIFICATION
AIR CONSTRUCTION PERMIT AC16-33885
JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL

Dear Mr. Fancy:

This is in response to your letter of February 18, 1994, concerning the Notice of Intent to Issue an air construction permit modification (AC16-33885) for the No. 10 Coal/Bark Boiler of this facility

In accordance with the instructions of the Intent to Issue, the "Notice of Intent to Issue Permit" has been published in the legal ad section of the Thursday, March 3, 1994 issue of the Florida Times-Union, Jacksonville, Florida.

Enclosed you will find the Proof of Publication of the legal notice which appeared in the Thursday, March 3, 1994 issue of the Florida Times-Union, Jacksonville, Florida.

Should there be any questions, please call Gene Tonn at (904) 353-3611.

Very truly yours,

Hollis H. Elder
Vice President & General Manager

CR# P 716 147 161

td:\permits\#10airmod.ltr

cc: C. Zogan
R. Robinson, Duval Co.
G. Cole, NE Dist
G. Harper, EPA

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT

The Department of Environmental Protection gives notice of its intent to issue an air construction permit (AC 16-234532) to Jefferson Smurfit Corporation, NO. 10 Coal/Bark Boiler at 1915 Wigmore Street, Jacksonville, Florida 32201. The permit will allow Jefferson Smurfit Corporation to increase the maximum heat input of the No. 10 boiler at its Jacksonville facility from 441 MMBtu per hour to 540 MMBtu per hour. This permit will not cause an exceedance of "significant emission rates" or ambient air quality standards. Therefore the prevention of significant deterioration (PSD) rule and best available control technology (BACT) do not apply to this permit. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 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, Florida Statutes.

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

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
Northeast District
7825 Baymeadows Way
Jacksonville, Florida 32256-3767.

Duval County Air Quality Division
421 West Church Street, Suite 412
Jacksonville, Florida 32202-4111

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

FLORIDA PUBLISHING COMPANY
Publisher
JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared _____

John Leist _____ who on oath says that he is

Classified Sale Representative _____ 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 Permit _____

in the _____ Court,

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

March 3, 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 preceding 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
this03..... day of

March A.D. 19 94.
Vera Janie Likens

Notary Public,
State of Florida at Large.
Vera Janie Likens
My Commission Expires _____

VERA JANIE LIKENS
MY COMMISSION # 00 220506 EXPIRES
June 1, 1996
DA 444
BONDED THRU TROY FAIR INSURANCE, INC.

John Leist