

Memorandum

Florida Department of Environmental Protection

TO: Clair Fancy

THRU: Al Linero *Al Linero* "15"

FROM: Syed Arif

DATE: November 5, 1997

SUBJECT: Jefferson Smurfit Corporation/ No. 10 Coal/Bark Boiler/ File No.
0310003-002-AC

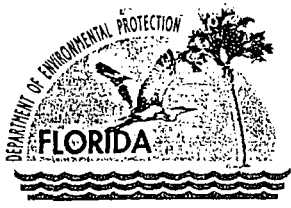
Attached is the public notice package ^{to} modify the construction permit for the subject facility. The change will allow them to increase the firing rate of bark by approximately 4 percent in terms of heat input. The facility is also permitted to burn coal. The total maximum combined heat input from coal and bark will stay unchanged.

This action is not expected to increase air emissions nor cause degradation of air quality. The air emission control systems include mechanical separators and a venturi scrubber for the control of particulate emissions, an absorption section using caustic soda for control of sulfur dioxide emissions, and a selective non-catalytic reduction system in the furnace combustion zone for the control of nitrogen oxides emissions.

Originally the applicant had requested authorization to burn woodwastes other than bark as well as sewage sludge. We informed them that we would have to perform a past actual to future potential emission calculation which would likely trigger PSD. They amended their request to just increasing the fraction of bark and backing off on coal. We have no reason to expect increased operation or emission increases from this scenario. They are already operating at a very high availability. Therefore we did not require the past actual to future potential calculation. We are on solid ground in making this determination without setting a precedent for cases where changes do in fact result in increased operations or emissions.

I recommend your approval and signature.

—



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 6, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Hollis H. Elder
Vice President & General Manager
Containerboard Mill Division
Jefferson Smurfit Corporation
P.O. Box 150
Jacksonville, Florida 32201

Re: DRAFT Permit Modification No. 0310003-002-AC
No. 10 Coal/Bark Boiler/ AC 16-234532


Dear Mr. Elder:

Enclosed is one copy of the Draft Air Construction Permit Modification for the Jefferson Smurfit Corporation located in Duval County. The Technical Evaluation and Preliminary Determination, the Department's Intent to Issue Air Construction Permit Modification and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION" must be published within 30 (thirty) days of receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (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 modification.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Mr. Syed Arif or Mr. Linero at 850/488-1344.

Sincerely,


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

CHF/sa/a

Enclosures

In the Matter of an
Application for Permit Modification by:

Jefferson Smurfit Corporation
1915 Wigmore Street
P.O. Box 150
Jacksonville, Florida 32201

DRAFT Permit Modification No. 0310003-002-AC
Permit No. AC16-234532
No. 10 Coal/Bark Boiler
Duval County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification (copy of DRAFT Permit modification attached) for the proposed project, as detailed in the application specified above, for the reasons stated below.

The applicant, Jefferson Smurfit Corporation, applied on April 15, 1997 to the Department for an air construction permit modification for its No. 10 Coal/Bark Boiler located in Jacksonville, Duval County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit modification is required to allow increasing the allowable firing rate of bark while maintaining the allowable overall heat input rate constant.

The Department intends to issue this air construction permit modification based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

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 "Public Notice of Intent to Issue AIR CONSTRUCTION PERMIT MODIFICATION". The notice shall be published one time only within 30 (thirty) days in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "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 one with significant circulation in the area that may be affected by the permit. 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, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-1344; Fax 850/922-6979) within 7 (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 modification pursuant to Rule 62-103.150 (6), F.A.C.

The Department will issue the FINAL Permit Modification, in accordance with the conditions of the enclosed DRAFT Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Modification issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION." Any written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Modification, the Department shall issue a Revised DRAFT Permit Modification and require, if applicable, another Public Notice.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. The procedures for petitioning for a hearing are set forth below. Mediation is not available for this action

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 850/488-9730, fax: 850/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

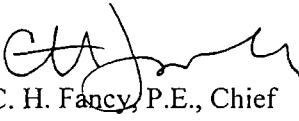
In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.


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


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION (including the PUBLIC NOTICE, and DRAFT permit modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 11-7-97 to the person(s) listed:

Mr. Hollis H. Elder, Jefferson Smurfit Corporation*
Mr. Chris Kirts, NED
Mr. Richard Robinson, RESD
Mr. David Buff, Golder Associates

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Keri Jobe
(Clerk)

11-7-97
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT Permit Modification No. 0310003-002-AC

Jefferson Smurfit Corporation
Duval County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Jefferson Smurfit Corporation (JSC) to increase the firing rate of bark for the No. 10 Coal/Bark Boiler located at JSC's Kraft pulp and paper mill, 1915 Wigmore Street, Jacksonville, Duval County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD). The boiler supplies steam to the mill. The applicant's name and address are: Jefferson Smurfit Corporation, P.O. Box 150, Jacksonville, Florida 32201.

The modification will allow an increase in the firing rate of bark. The total maximum combined heat input to the No. 10 boiler from coal and bark will remain unchanged. Coal usage will be reduced accordingly. Emissions of sulfur dioxide are controlled by caustic soda absorption, while emissions of nitrogen oxides are controlled by selective non-catalytic reduction. Particulate matter is controlled by mechanical separators and a venturi scrubber.

Generally emissions from bark are less than from coal. The unit is already operating near its permitted production limits. The change will not increase usage of the units nor result in significant emissions increases.

The Department will issue the FINAL Permit Modification, in accordance with the conditions of the DRAFT Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Modification issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Any written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Modification, the Department shall issue a Revised DRAFT Permit Modification and require, if applicable, another Public Notice.

The Department will issue FINAL Permit Modification with the conditions of the DRAFT Permit Modification unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. The procedures for petitioning for a hearing are set forth below. Mediation is not available for this action.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 850/488-9370, fax: 850/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within

fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file 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 Telephone: 850/488-1344 Fax: 850/922-6979	Regulatory & Environmental Services Department 421 West Church Street Suite 422 Jacksonville, Florida 32202 Telephone: (904)630-3484 Fax: (904)630-3638	Department of Environmental Protection 7825 Baymeadows Way Suite 200B Jacksonville, Florida 32256 Telephone: (904) 448-4300 Fax: (904) 448-4363
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The complete project file includes the Draft Permit Modification, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-1344, for additional information.

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

JEFFERSON SMURFIT CORPORATION

No. 10 Coal/Bark - Fired Power Boiler
Jacksonville, Florida
Duval, County

Air Construction Permit No. 0310003-002-AC

[Modifies AC16-234532; No. 10 Power Boiler]

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

November 6, 1997

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. APPLICATION INFORMATION

1.1 Applicant Name and Address

Jefferson Smurfit Corporation

P.O. Box 150

Jacksonville, FL 32201

Authorized Representative: Mr. Hollis H. Elder, V.P. and General Manager

1.2 Reviewing and Process Schedule

Date of Receipt of Application:	April 18, 1997
Department's Preliminary Incompleteness Letter:	April 28, 1997
Jefferson Smurfit's Response to Department's letter of 04-28-1997:	September 9, 1997
Department's Second Incompleteness Letter:	October 6, 1997
Jefferson Smurfit's Response to Department's letter of 10-06-1997:	October 9, 1997
Jefferson Smurfit's amended request via facsimile:	November 4, 1997
Application Completeness Date:	November 4, 1997

2. FACILITY INFORMATION

2.1 Facility Location

The Jefferson Smurfit Corporation Kraft pulp and paper facility is located north of downtown Jacksonville, along the St. Johns River. The UTM coordinates of this facility are Zone 17; 439.5 km E; 3359.1 km N.

2.2 Standard Industrial Classification Code (SIC)

Major Group No.	26	Paper & Allied Products
Group No.	263	Paperboard Mills
Industry No.	2631	Paperboard Mills

2.3 Facility Category

This facility consists of a Kraft paper mill and includes the No. 10 Power Boiler which provides steam to the paper making process. The boiler burns coal and bark.

Jefferson Smurfit is classified as a major air pollutant emitting facility. Air pollutant emissions are over 100 TPY for particulate matter (PM/PM10), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC).

This facility is on the list of the 28 Major Facility Categories, Table 62-212.400-1. This facility is also classified as a Title V facility.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

3. PROJECT DESCRIPTION

3.1 This permit addresses the following emissions units:

EMISSION UNIT NO.	SYSTEM	EMISSION UNIT DESCRIPTION
013	Steam	No. 10 Power Boiler

The most recent state construction permit (AC16-234532) was issued to Jefferson Smurfit on May 24, 1994. The permit was modified on this date to allow the increase in the maximum heat input by firing additional bark. The permit also required the installation of a selective non-catalytic reduction (SNCR) system for NO_x control.

Currently, the No. 10 Power Boiler is limited to a maximum heat input of 540 MMBtu/hr due to the combined firing of coal and bark. Coal firing itself is limited to 397 MMBtu/hr and 30,600 lb/hr, while bark firing is limited to 143 MMBtu/hr and 35,000 lb/hr. No. 6 fuel oil may be fired during periods of start up, shutdown and malfunctions.

Due to the purchase of off-site bark, the availability of bark for Jefferson Smurfit is expected to increase in the future. As a result, Jefferson Smurfit requests an increase in the maximum heat input due to bark firing from 143 MMBtu/hr to 162 MMBtu/hr, or an increase of 19 MMBtu/hr. The total maximum heat input to the boiler of 540 MMBtu/hr will not change. As a result, when burning the higher amount of bark (162 MMBtu/hr), the heat input due to coal will be limited to 378 MMBtu/hr.

It is not expected that actual air emissions to the atmosphere will increase from the No. 10 Power Boiler as a result of this change. Hourly emissions are not expected to change because bark is a cleaner fuel compared to coal with respect to sulfur, nitrogen and heavy metals. The operation of the SNCR system and flue gas desulfurization (FGD) system can be adjusted to maintain emission levels. Since bark is always fired in the boiler in combination with coal, the small increase in bark firing (less than 4% change) is not expected to change the overall combustion characteristics of the process. On an annual basis, no increase in emissions are expected due to the increased bark firing, since the availability of the boiler is already very high (approximately 98% in 1996), and any changes in steam demands will be due to market conditions and plant shutdown duration.

The No. 10 Power Boiler currently has hourly and annual emission limits for NO_x, SO₂, CO, PM/PM₁₀ and VOC. The requested changes in the bark heat input limit will not increase permitted hourly or annual emissions to the atmosphere of these pollutants or any PSD regulated pollutant. All hourly and annual emission limits will remain as currently specified in the permit.

4. PROCESS DESCRIPTION

The No. 10 Power Boiler is a combination coal/bark-fired boiler. The boiler provides process steam to the mill's paper making process. Jefferson Smurfit was issued a state construction permit (AC16-234532) on May 24, 1994 to allow the increase in the maximum heat input by

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

firing additional bark. The permit also required the installation of a selective non-catalytic reduction (SNCR) system for NO_x control. The SNCR has been installed and is operational. The boiler is also served by a wet caustic scrubbing FGD system, which controls SO₂ emissions.

The No. 10 Power Boiler is currently limited to a maximum heat input of 540 MMBtu/hr due to the combined firing of coal and bark. Coal firing is limited to 397 MMBtu/hr and 30,600 lb/hr, and a maximum sulfur content of 1.0%. Bark firing is limited to 143 MMBtu/hr and 35,000 lb/hr. No. 6 fuel oil may be fired during periods of start up, shutdown and malfunctions.

Emission limits imposed on the No. 10 Power Boiler consist of lb/MMBtu limits for NO_x, SO₂, and PM/PM₁₀. Hourly (lb/hr) and annual (TPY) emission limits exist for these pollutants as well as CO and VOC.

5. RULE APPLICABILITY

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.).

This facility is located in Duval County, an area designated as attainment for all criteria pollutants in accordance with Rule 62-204.360, F.A.C. The proposed project is not subject to review under Rule 62-212.400., F.A.C., Prevention of Significant Deterioration (PSD), because the potential emission increases for all PSD pollutants will not exceed the significance emission rates given in Chapter 62-212, Table 62-212.400-2, F.A.C.

The emission units affected by this [permit/modification] shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein) and, specifically, the following Chapters and Rules:

Chapter 62-4	Permits.
Rule 62-204.220	Ambient Air Quality Protection
Rule 62-204.240	Ambient Air Quality Standards
Rule 62-204.260	Prevention of Significant Deterioration Increments
Rule 62-204.360	Designation of Prevention of Significant Deterioration Areas
Rule 62-204.800	Federal Regulations Adopted by Reference
Rule 62-210.300	Permits Required
Rule 62-210.350	Public Notice and Comments
Rule 62-210.370	Reports
Rule 62-210.550	Stack Height Policy
Rule 62-210.650	Circumvention
Rule 62-210.700	Excess Emissions
Rule 62-210.900	Forms and Instructions
Rule 62-212.300	General Preconstruction Review Requirements
Rule 62-212.400	Prevention of Significant Deterioration
Rule 62-213	Operation Permits for Major Sources of Air Pollution

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Rule 62-296.320	General Pollutant Emission Limiting Standards
Rule 62-297.310	General Test Requirements
Rule 62-297.401	Compliance Test Methods
Rule 62-297.520	EPA Continuous Monitor Performance Specifications

6. CONCLUSION

Based on the foregoing technical evaluation of the request and additional information submitted by Jefferson Smurfit, the Department has made a preliminary determination and has reasonable assurance that the proposed project will comply with all applicable state and federal air pollution regulations.

Permit Engineer: Syed Arif

Reviewed and Approved by A. A Linero, P.E.

DRAFT

December XX, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Hollis H. Elder
Vice President & General Manager
Containerboard Mill Division
Jefferson Smurfit Corporation
P.O. Box 150
Jacksonville, Florida 32201

Re: Permit Amendment No. 0310003-002-AC
No. 10 Coal/Bark Boiler/ AC 16-234532

Dear Mr. Elder:

The Department has reviewed your request of April 15, 1997, and subsequent letters dated September 8, 1997, October 9, 1997, and November 4, 1997. The request to amend Specific Condition 10 of the subject permit to increase the firing rate of bark is acceptable to the Department. Construction permit No. AC 16-234532 is hereby modified as follows:

SPECIFIC CONDITION NO. 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~~ 162.0 MMBtu/hour, respectively, ~~for a~~ [†]Total maximum heat input from the combined fuel ~~of~~ shall not exceed 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~~ 39,650 lb/hr.

A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit. Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Howard L. Rhodes, Director
Division of Air Resources
Management

DRAFT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT MODIFICATION (including the FINAL permit Modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on _____ to the person(s) listed:

Mr. Hollis Elder, JSC *
Mr. Gene Tonn, JSC
Mr. David Buff, Golder Associates
Mr. Richard Robinson, RESD
Mr. Chris Kirts, NED

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52(7), Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.

Clerk)

(Date)

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

RECEIVED

NOV 14 1997

**BUREAU OF
AIR REGULATION**

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, NSRS
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400



Is your RETURN ADDRESS completed on the reverse side

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

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

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Nellis H. Elder, VP & GM
Containerboard Mill Div
Jefferson Smurfit Corp
PO Box 150
Jacksonville, FL 32201

4a. Article Number

P265 659 483

4b. Service Type

- Registered
- Certified
- Express Mail
- Insured
- Return Receipt for Merchandise
- COD

7. Date of Delivery

11-11-97

5. Received By: (Print Name)

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

6. Signature: (Addressee or Agent)

X *Moses L. ...*

Thank you for using Return Receipt Service.

P 265 659 483

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to		Jollis Elder	
Street & Number		Johnson Street	
Post Office, State, & ZIP Code		Gainesville FL	
Postage		\$	
Certified Fee			
Special Delivery Fee			
Restricted Delivery Fee			
Return Receipt Showing to Whom & Date Delivered			
Return Receipt Showing to Whom, Date, & Addressee's Address			
TOTAL Postage & Fees		\$	
Postmark or Date	0310003-002-AC 11-7-97		

PS Form 3800, April 1995