



file

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 11, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Hollis H. Elder
Vice President & General Manager
Jefferson Smurfit Corporation
Post Office Box 150
Jacksonville, Florida 32201

Dear Mr. Elder:

Re: Burning of Fire Damaged Wastepaper in No. 10 Coal/Bark Boiler Permit No. AC16-234532

The Department received Jefferson Smurfit's July 6 letter requesting approval to burn approximately 200 tons of damaged wastepaper in the No. 10 coal/bark boiler. The permit is amended as follows:

Between July 11 and July 20, 1995 the permittee is hereby permitted to burn the 200 tons (dry basis) of waste paper consisting of pre-consumer clippings from box plants and textile wastepaper which was damaged in an on-site spontaneous combustion fire. The wastepaper shall be mixed with bark not exceeding 10 percent (by weight) of wastepaper in the mixture. The wastepaper shall be burned in the No. 10 coal/bark boiler permitted under state construction permit number AC16-234532.

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 applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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.

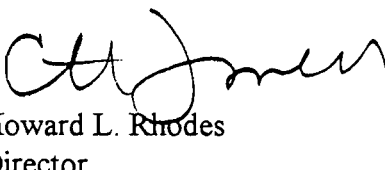
The Petition shall contain the following information:

- (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 the 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 amendment. Persons whose substantial interests will be affected by any 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 receipt of this amendment 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.

This letter amendment must be attached to the construction permit, No. AC 16-234532, and shall become part of the permit.

Sincerely,


for Howard L. Rhodes
Director
Division of Air Resources
Management

Mr. Hollis H. Elder
July 10, 1995
Page 3 of 3

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 7-11-95 to the listed persons.

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.

Kay J. Ober 7-11-95
Clerk Date

Copies furnished to:

J. Cole, ~~SWD~~ NED

R. Roberson, RESD

G. Tomm, JSC

Karras Parvey, SSC, via FAX, 7/10/95 (Kaw)

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:
*Hollis Elder, VP + GM
 Jefferson Smurfit Corp
 P.O. Box 150
 Jacksonville, FL
 32201*

4a. Article Number
2 392 979 052

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

7. Date of Delivery
7-17-95

5. Signature (Addressee)

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

6. Signature (Agent)
[Signature]

PS Form 3811, December 1991 *U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

2 392 979 052



Receipt for Certified Mail

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

PS Form 3800, March 1993

| | | |
|---|----------------------------|--|
| Sent to | <i>Hollis Elder</i> | |
| Street and No. | <i>Jefferson Smurfit</i> | |
| No., State and ZIP Code | <i>Jacksonville FL</i> | |
| 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 | <i>AC16-234532/7-11-95</i> | |

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes
FROM: Clair Fancy *ISIGNED*
DATE: July 11, 1995
SUBJECT: Approval to burn fire damaged wastepaper in No. 10 coal/bark boiler Permit No. AC16-234532 Jefferson Smurfit Corporation

Attached for your approval and signature is a letter modifying the above referenced construction permit.

Wastepaper bales stored on-site spontaneously combusted setting them on fire. They recovered approximately 200 tons (dry basis) which was damaged. Jefferson Smurfit requested to burn the waste mixed in with bark not exceeding 10 percent (by weight) of wastepaper in the mixture.

The Bureau recommends approval of this amendment.

CF/kw

Attachment



JEFFERSON SMURFIT CORPORATION

al

Containerboard Mill Division

1915 WIGMORE STREET
P.O. BOX 150
JACKSONVILLE, FL 32201
TELEPHONE: 904/353-3611

July 10, 1995

FAX - 904 922-6979

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

**SUBJECT: Burning of Fire Damaged Wastepaper in
No. 10 Coal/Bark Boiler
Permit Number AC 16-234532
Jefferson Smurfit Corporation
Jacksonville Mill**

Dear Mr. Fancy:

Based on our telephone conversation this morning, I am faxing you the request faxed to the Jacksonville RESD to burn the fire damaged wastepaper in our No. 10 Coal/Bark Boiler.

If you have any questions or need additional information, you could reach me at (904) 798-5708 or by fax at (904) 798-5700.

Thanking you.

Very truly yours,

K. Parvez

Kairas Parvez
Environmental Engineer

Gene Form
Will send check #2505
within two weeks.
per K. Parvez.
via telephone.
KFD

| | | | | | |
|-------------------------------|--------------|---------|-------------------|------------|---|
| Post-it [®] Fax Note | 7671 | Date | 7/10/95 | # of pages | 2 |
| To | CLAIR FANCY | From | KAIRAS PARVEZ | | |
| Co./Dept. | FDEP | Co. | JEFFERSON SMURFIT | | |
| Phone # | 904 488-1344 | Phone # | 904 798-5708 | | |
| Fax # | 904 922-6979 | Fax # | 904 798-5700 | | |





Best Available Copy

JEFFERSON SMURFIT CORPORATION

Containerboard Mill Division

1918 WIGMORE STREET

P.O. BOX 150

JACKSONVILLE, FL 32201

TELEPHONE: 904/363-3611

July 6, 1995

FAX - 904 630-3638

Mr. Jerry Woosley
Pollution Control Engineer
Air Quality Division
Regulatory and Environmental Services Department
421 West Church Street, Suite 412
Jacksonville, Florida 32202-4111

**SUBJECT: Burning of Fire Damaged Wastepaper in
No. 10 Coal/Bark Boiler
Permit Number AC 16-234532
Jefferson Smurfit Corporation
Jacksonville Mill**

Dear Mr. Woosley:

Early this morning at approximately 1:30 am waste paper bales stored on-site spontaneously combusted setting them on fire. The mill with the help of the fire department salvaged most of the wastepaper damaging approximately 200 tons (dry basis). The damaged wastepaper bales comprise of pre-consumer clippings from box plants and textile wastepaper (i.e cleaner than old corrugated containers (OCC)).

The mill will attempt to use the damaged wastepaper by processing on-site as routinely done. If in the event this wastepaper processed does not meet quality, the mill desires that the damaged wastepaper be disposed of properly. Therefore, the mill requests the Department permit the burning of 200 tons of this wastepaper in the No. 10 Coal/Bark boiler by mixing with bark, not exceeding 10 percent (by weight) of wastepaper in the mixture. The Jacksonville Mill believes that disposal in this manner will cause no additional air pollution.

Your consideration in this matter would be greatly appreciated.

Thanking you.

Very truly yours,

Hollis H. Elder
Vice President & General Manager

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes
FROM: Clair Fancy *I signed*
DATE: July 11, 1995
SUBJECT: Approval to burn fire damaged wastepaper in No. 10 coal/bark boiler Permit No. **AC16-234532** Jefferson Smurfit Corporation

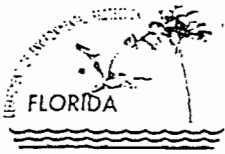
Attached for your approval and signature is a letter modifying the above referenced construction permit.

Wastepaper bales stored on-site spontaneously combusted setting them on fire. They recovered approximately 200 tons (dry basis) which was damaged. Jefferson Smurfit requested to burn the waste mixed in with bark not exceeding 10 percent (by weight) of wastepaper in the mixture.

The Bureau recommends approval of this amendment.

CF/kw

Attachment



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: Kairas Parvez fax 904 798 5700

DATE: 10 July 1995 PHONE: 904 798 5708 ph

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 4

FROM: Clair Fancy / Kanani K. Winans
DIVISION OF AIR RESOURCES MANAGEMENT

COMMENTS: The hardcopy will follow via
mail tomorrow

PHONE: 904 488 1344

FAX NUMBER: 904/922-6979

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

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

MESSAGE CONFIRMATION

JUL-10-'95 MON 17:25

TERM ID:

P-9999

TEL NO:

| NO. | DATE | ST. TIME | TOTAL TIME | ID | DEPT CODE | OK | NG |
|-----|-------|----------|------------|--------------|-----------|----|----|
| 460 | 07-10 | 17:22 | 00:02:37 | 904+798+5700 | | 04 | 00 |



JEFFERSON SMURFIT CORPORATION

Containerboard Mill Division
RECEIVED
915 WIGMORE STREET
P.O. BOX 450
JACKSONVILLE, FL 32201
TELEPHONE: 904/353-3611
JUL 31 1995

July 26, 1995

Bureau of
Air Regulation

CERTIFIED RETURN RECEIPT REQUESTED

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

**SUBJECT: Burning of Fire Damaged Wastepaper in
No. 10 Coal/Bark Boiler
Permit Number AC 16-234532
Jefferson Smurfit Corporation
Jacksonville Mill**

Dear Mr. Fancy:

Enclosed is a check (No. 1135760) in the amount of \$250 for the fee to modify the No.10 Coal/Bark Boiler Construction Permit to burn the fire damaged wastepaper.

Thank you for your cooperation.

Very truly yours,

Kairas Parvez
Environmental Engineer

Enclosure

kp/modfee10.doc

CR# Z 434 657 728



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

June 22, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Hollis H. Elder
Vice President & General Manager
Jefferson Smurfit Corporation
Post Office Box 150
Jacksonville, Florida 32201

Dear Mr. Elder:

RE: Amendment to Construction Permit AC 16-234532(A), No. 10 Coal/Bark Boiler

The Department has reviewed your June 14, 1995 request to amend the compliance stack testing requirements of the subject permit. The Department's determination on this amendment request is as follows:

A. Compliance Stack Testing

Specific Condition No. 11 is amended as follows:

From:

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 SO₂. Reports of these tests shall be provided to the RESD and the Department within 45 days after testing.

To:

11. Within 30 days after issuance of this permit and again within 90 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 SO₂. Reports of these tests shall be provided to the RESD and the Department within 45 days after testing.

B. Attachments to be Incorporated:

- JSC letter dated June 12, 1995

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 applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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 the 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 amendment. Persons whose substantial interests will be affected by any 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 receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition

Hollis H. Elder
Jefferson Smurfit
June 22, 1995
Page 3 of 3

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 64-234532(A), and shall become part of the permit.

Sincerely,



for Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/AAL/kw

Attachment

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 6-22-95 to the listed persons.

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.

Karin Jober 6-22-95
Clerk Date

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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Hollis A. Elder, VP
 Jefferson Smurfit Corp
 P O Box 150
 Jacksonville, FL 32201

4a. Article Number
 2392 979 005

4b. Service Type

Registered Insured

Certified COD

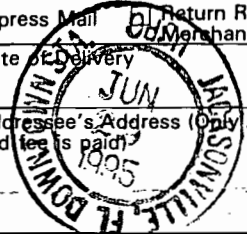
Express Mail Return Receipt for Merchandise

7. Date of Delivery
 JUN 20 1995

5. Signature (Addressee)
 [Signature]

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

6. Signature (Agent)
 [Signature]



PS Form 3811, December 1991 *U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

2 392 979 005



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

PS Form 3800, March 1993

| | |
|---|--------------------------|
| Sent to | Hollis Elder |
| Street and No. | Jefferson Smurfit Corp |
| P. O. State and ZIP Code | Box 150, FL |
| 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 | AC 16-2345 32(A) 6-22-95 |

Memorandum

Florida Department of
Environmental Protection

TO: Howard L. Rhodes
FROM: Clair Fancy
DATE: June 20, 1995
SUBJECT: Amendment of Permit No. **AC16-234532**
Jefferson Smurfit Corporation

I signed

Attached for your approval and signature is a letter modifying the above referenced construction permit.

As the attachment to the amendment details there were specific problems in executing the second stack test as required by specific condition 11 of the original permit. Jefferson Smurfit requested that we allow 90 days after the SNCR became operational to conduct the second stack test to determine compliance.

The Bureau recommends approval of this amendment.

CF/kw

Attachment



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

June 19, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Hollis H. Elder
Vice President & General Manager
Jefferson Smurfit Corporation
Post Office Box 150
Jacksonville, Florida 32201

Dear Mr. Elder:

Re: Extension of Permit No. AC16-234532

The Department received Jefferson Smurfit's May 30 letter requesting an extension of the expiration date of the above permit. The expiration date is changed as shown below:

From: July 1, 1995

To: **January 15, 1996**

This letter must be attached to your construction permit No. AC 16- 234532, and shall become a part of the permit.

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 applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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.

Hollis H. Elder
June 19, 1995
Page Two

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 the 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 amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment 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 receipt of this amendment 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.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/AL/w

cc: J. Cole, SWD
R. Roberson, RESD
J. Harper, EPA
J. Bunyak, NPS
B. Collom, GAPC
G. Tonn, JSC

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:
 Hollis H. Elder, VP
 Jefferson Smurfit Corp.
 P.O. Box 150
 Jacksonville, FL 32201

4a. Article Number
 Z 392 979 045

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

7. Date of Delivery
 6-22-95

5. Signature (Addressee)

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

6. Signature (Agent)
 Vince W... [Signature]

PS Form 3811, December 1991 U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

Z 392 979 045




Receipt for Certified Mail

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

PS Form 3800, March 1993

| | |
|---|-------------------|
| Sent to | Hollis Elder |
| Street and No. | Jefferson Smurfit |
| P.O., State and ZIP Code | JAK FL 32201 |
| 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 | 6-19-95 |
| | AC16-234532 |

TO: Howard L. Rhodes

FROM: Clair Fancy 

DATE: June 19, 1995

SUBJECT: Amendment of Permit No. **AC16-234532**
Jefferson Smurfit Corporation

Attached for your approval and signature is a letter extending the expiration date of the above referenced construction permit.

The construction permit was valid through July 1, 1995 and was extended through January 15, 1996, 60 days after the due date for their Title V application submittal. This extension will ensure that Jefferson Smurfit has a valid permit while the Department conducts its completeness review of Jefferson's Title V permit application.

The Bureau recommends approval of this amendment.

CF/kw

Attachment



JEFFERSON SMURFIT CORPORATION

June 12, 1995

CERTIFIED - RETURN RECEIPT REQUESTED

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

**SUBJECT: AIR PERMIT MODIFICATION
AIR CONSTRUCTION PERMIT AC16-234532
NO. 10 COAL/BARK BOILER
JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL**

Dear Mr. Fancy:

The purpose of this letter is to request a modification to Specific Condition 11 of the subject permit.

Specific Condition 11 of the subject permit requires that, "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".

The subject permit was issued on May 19, 1994. A compliance stack test was conducted on June 10, 1994, within the 30 days of permit issuance. The SNCR was declared operational on May 19, 1995. The second compliance stack test according to Specific Condition 11 is required no later than June 19, 1995.

On May 1, 1995 the No. 10 Coal/Bark Boiler was shut down for a facility-wide periodic scheduled maintenance shutdown. The boiler was returned to service on May 10, 1995. On May 11, 1995 an electrical transformer serving one of two modes of the boiler's induced draft (ID) fan suffered a failure which reduced the operating capacity of the boiler to about 70 per cent of the maximum permitted BTU input. The failed electrical transformer was removed, repaired and has now been physically positioned for a return to service. On June 20, 1995 the No. 10 Coal/Bark Boiler is scheduled to be shut down in order to connect the repaired transformer to the electrical system of the induced draft (ID) fan and to commission the electrical control system for that mode of the ID fan which has been inoperable since May 11, 1995. Operation of the No. Coal/Bark Boiler will be resumed upon completion of the installation of the transformer and the commissioning of the ID fan electrical control system, which is expected to be no later than June 21, 1995.

Containerboard Mill Division

1915 WIGMORE STREET
P.O. BOX 150
JACKSONVILLE, FL 32201
TELEPHONE: 904/353-3611

RECEIVED

JUN 14 1995

**Bureau of
Air Regulation**



Mr. C. H. Fancy, P.E.
June 12, 1995
Page 2

Specific Condition 15 of the subject permit requires that the compliance stack test required by Specific Condition 11 be conducted at 90-100 percent of the maximum operating rate allowed by the permit.

During the time of the transformer outage, the boiler has operated at about 70 per cent of the maximum operating rate allowed by the permit and operation of the SNCR has not been required to comply with the allowable NOx emission standard.

Because of the inability to conduct a compliance test according to the provisions of Specific Conditions 11 and 15, Jefferson Smurfit Corporation is requesting an extension of 60 days from June 19, 1995, to August 18, 1995 to return the No. 10 Coal/Bark Boiler to operation at permitted capacity, to complete "fine tuning" of the SNCR, and to conduct the required compliance stack test.

Enclosed is a check in the amount of \$50 for the required fee for this modification to the subject permit.

We trust that the Department will favorably consider this request for modification of the subject permit.

Should there be any question about this request, please call Gene Tonn at 904/798-5662.

Very truly yours,



Hollis H. Elder
Vice President & General Manager

CR# Z 434 656 212



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED

4APT-AEB

JUN 07 1994

JUN 10 1994

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

Bureau of
Air Regulation

SUBJ: Jefferson Smurfit Corporation

Dear Mr. Fancy:

This is to acknowledge receipt of your final determination and permit for the modifications at the above referenced facility by letter dated May 24, 1994. The modification involves increasing the permitted heat input to an existing coal/wood-fired boiler, adding selective non-catalytic reduction (SNCR) to limit NO_x emissions, and the addition of emissions limits to the permit such that the modification will not be "major". We have reviewed this package and have no adverse comments.

Thank you for the opportunity to review and comment on the package and for addressing earlier concerns related to potential Prevention of Significant Deterioration (PSD) applicability. If you have any questions on these comments, please contact Mr. Gregg Worley of my staff at (404) 347-5014.

Sincerely yours,

Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: C. Fogar
C. Holladay
G. Cole, NE Dist.
R. Robinson, ESD
G. Bunnard, NPS



JEFFERSON SMURFIT CORPORATION

3755
2222

0103151

Containerboard Mill Division

1915 WIGMORE STREET
P.O. BOX 150
JACKSONVILLE, FL 32201
TELEPHONE: 904/353-3611

May 30, 1995

CERTIFIED - RETURN RECEIPT REQUESTED

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

SUBJECT: AIR PERMIT MODIFICATION 234532
AIR CONSTRUCTION PERMIT AC16-33885
JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL

Dear Mr. Fancy:

The purpose of this letter is to request an extension of the permit expiration date of the subject permit from July 1, 1995 to February 1, 1996. This request is being made in order to extend the permit beyond the Department's Title V Operating Permit Application date and the Application Completion Declaration Date.

Enclosed is a check in the amount of \$50 for the required fee for this modification to the subject permit.

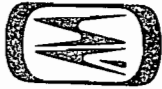
Should there be any question about this request, please call Gene Tonn at 904/798-5662.

Very truly yours,

Hollis H. Elder
Vice President & General Manager

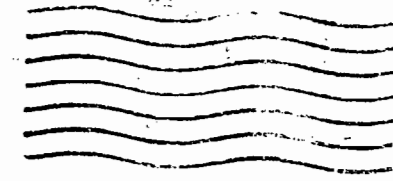
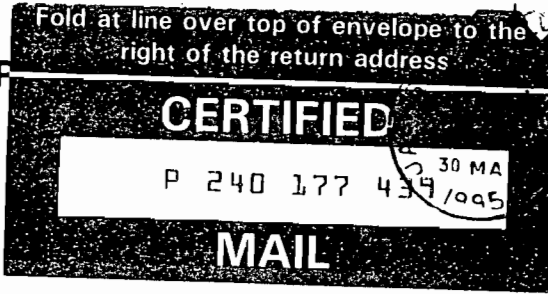
CR# P 240 177 439





JEFFERSON SMURFIT CORP

1915 WIGMORE STREET, P.O. BOX 150, JACKSONVILLE, FL 32201



RETURN RECEIPT REQUESTED

55048

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Division of Air Resources Management
Florida Dept. of Environmental Reg.
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
CERTIFIED MAIL - RETURN RECEIPT REQUESTED

P

32399-2400



JSC/CCA

JEFFERSON SMURFIT CORPORATION AND
CONTAINER CORPORATION OF AMERICA
401 Alton Street P.O. Box 276 Alton IL 62002-2276

No. 1135459 6103151

SCOTT CITY BANK & TRUST
A CORRESPONDENT OF BOATMEN'S BANK

DATE 05-30-95

PLANT NO.

13

The sum of 50 dols 00 cts

PAY TO THE ORDER OF FLORIDA DEPT OF ENVIRONMENTAL REGULATION
2600 BLAIR STONE ROAD
TALLAHASSEE, FL 32399

THIS CHECK NOT VALID UNLESS PRESENTED FOR PAYMENT WITHIN 180 DAYS FROM DATE OF ISSUE

*****\$50.00*****
AMOUNT

JEFFERSON SMURFIT CORPORATION

2ND SIGNATURE REQUIRED IF OVER \$5,000

2ND SIGNATURE

1ST SIGNATURE



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

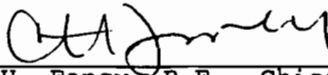
Mr. Hollis H. Elder
Vice President and General Manager
Jefferson-Smurfit Corporation
Post Office Box 150
Jacksonville, FL 32201

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

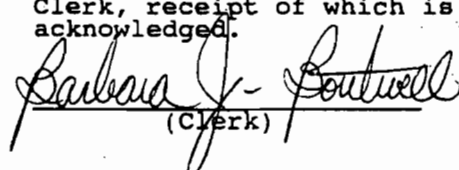

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 5/24/94 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.


(Clerk) 5/24/94
(Date)

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

s your RETURN ADDRESS completed on the reverse side?

| | | |
|--|--|---|
| <p>SENDER:</p> <ul style="list-style-type: none"> • 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 is delivered and the date delivered. | | <p>I also wish to receive the following services (for an extra fee):</p> <p>1. <input type="checkbox"/> Addressee's Address</p> <p>2. <input type="checkbox"/> Restricted Delivery</p> <p>Consult postmaster for fee.</p> |
| <p>3. Article Addressed to:</p> <p>Mr. Hollis H. Elder Vice President and General Manager Jefferson-Smurfit Corporation Post Office Box 150 Jacksonville, Florida 32201</p> | | <p>4a. Article Number</p> <p>P 872 562 724</p> |
| <p>5. Signature (Addressee)</p> | | <p>4b. Service Type</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured</p> <p><input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD</p> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> |
| <p>6. Signature (Agent)</p> <p><i>Hollis H. Elder</i></p> | | <p>7. Date of Delivery</p> <p>5/27/94</p> |
| <p>8. Addressee's Address (Only if requested and fee is paid)</p> | | |

RECEIVED

MAY 31 1994

Bureau of
Air Regulation

Thank you for using Return Receipt Service

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

P 872 562 724



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

| | | |
|---|--|---------------------------------|
| Sent to | | Mr. Hollis H. Elder |
| Street and No. | | Post Office Box 150 |
| P.O., State and ZIP Code | | Jacksonville, FL 32201 |
| 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: 5/24/94 AC 16-234532 |

PS Form 3800, JUNE 1991

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

May 20, 1994

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 SO₂ 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 SO₂ 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.



Florida Department of Environmental Protection

Lawton Chiles
Governor

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.
2. Incompleteness letter to JSC on August 11, 1993.
3. JSC response to incompleteness letter received on September 20, 1993.
4. 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.
9. Final Determination dated 3/30/94.

PERMITTEE:
Jefferson Smurfit Corp.

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.

PERMITTEE:
Jefferson Smurfit Corp.

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.

PERMITTEE:
Jefferson Smurfit Corp.

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.

PERMITTEE:
Jefferson Smurfit Corp.

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/PM₁₀ 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.

PERMITTEE:
Jefferson Smurfit Corp.

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

SPECIFIC CONDITIONS:

9. The owner and operator shall report monthly emissions of SO₂ 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 preceeding month of operation until the SNCR is operational. SO₂ 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 SO₂. 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> | <u>*Test Method</u> |
|-----------------------------------|-----------------|----------------------------|
| 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).

PERMITTEE:
Jefferson Smurfit Corp.

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 (RESO) 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 RESO and NE District Office [in accordance with 40 CFR 60.7(c)] for the following pollutants:

- (A) Nitrogen oxides
- (B) Sulfur dioxide

PERMITTEE:
Jefferson Smurfit Corp.

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

PERMITTEE:
Jefferson Smurfit Corp.

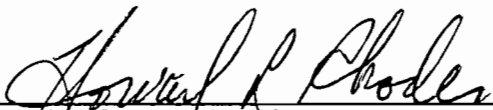
Permit Number: AC 16-234532
Expiration Date: July 1, 1995

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 19 day
of May, 1994

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Howard L. Rhodes
Director
Division of Air Resources
Management

Florida Department of
Environmental Protection

Memorandum

TO : Howard L. Rhodes
FROM : Clair H. Fancy *CHF*
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 SO₂ 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



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
J. Cole, NE Dist
D. Robinson, RESD
B. Jinn, ISC
J. Manning, P.E.
R. Callem, O&H
J. Harper, EPA

D. Worley, EPA
B. Colson, GA P C

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.

RECEIVED

MAR 14 1994

Bureau of
Air Regulation



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



421 West Church Street - Suite 412
Jacksonville, Florida 32202-4111


Area Code 904/630-3484

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. Robinson, 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: 2:40 PM

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

MESSAGE: ENCLOSED ARE AQD'S COMMENTS
ON THE JEFFERSON SNURFIT NO. 10 BOILER
PERMIT, AC 16-234532. 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 - MAIL ROOM
1994 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. Zogian
R. Robinson, Duval Co.
G. Cole, NE Dist
J. Harper, EPA

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 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
 thisQ3..... day of

March A.D. 19 94.
Vera Jamie Likens
 Notary Public,
 State of Florida at Large.

Vera Jamie Likens
 My Commission Expires
 VERA JAMIE LIKENS
 MY COMMISSION # CC 222556 EXPIRES
 June 1, 1996
 DA 444
 BONDED THRU TROY FAIR INSURANCE, INC.

John Leist

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 14-234532) 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 Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

February 18, 1994

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Elder:

Attached is a copy of the Technical Evaluation and Preliminary Determination and proposed permit modification of the air construction permit (AC 16-33885) for the No. 10 Power Boiler at the applicant's facility located at 1915 Wigmore Street, Jacksonville, Florida, in Duval County.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

Sincerely,

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

CHF/CSL

Attachments

cc: J. Cole, NED
R. Roberson, AQD RESD (Duval Co.)
G. Tonn, JSC
J. Manning, P.E.
R. Caleen, O&H
J. Harper, U.S. EPA
G. Worley, U.S. EPA
J. Bunyak, NPS
B. Collom, GAPC

Is your RETURN ADDRESS completed on the reverse side?

| | | | |
|---|--|---|--|
| SENDER: <ul style="list-style-type: none"> • 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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee. | |
| 3. Article Addressed to: Mr. Hollis H. Elder Vice President and General Manager Jefferson-Smurfit Corporation P. O. Box 150 Jacksonville, FL 32201 | | 4a. Article Number P 872 562 604 | |
| 5. Signature (Addressee) | | 4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise | |
| 6. Signature (Agent) <i>Vince White</i> | | 7. Date of Delivery <i>2-24-94</i> | |
| 8. Addressee's Address (Only if requested and fee is paid) | | 8. Addressee's Address (Only if requested and fee is paid) | |

Thank you for using Return Receipt Service.

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

P 872 562 604



Receipt for Certified Mail

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

PS Form 3800, JUNE 1991

| | |
|---|----|
| Sent to Mr. Hollis H. Elder, JSC | |
| Street and No. P. O. Box 150 | |
| P.O., State and ZIP Code Jacksonville, FL 32201 | |
| 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: 2-18-94 Permit: AC 16-234532 | |

State of Florida
Department of Environmental Protection

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

DEP File No. AC 16-234532
Duval County

Mr. Hollis H. Elder
Jefferson-Smurfit Corporation
Post Office Box 150
Jacksonville, Florida 32201

INTENT TO ISSUE

The Department of Environmental Protection gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Jefferson-Smurfit Corporation, on July 16, 1993, submitted to the Department of Environmental Protection an application to modify the air construction permit for the No. 10 power boiler by increasing the maximum heat input from 441 MMBtu per hour to 540 MMBtu per hour. This increase in heat input would be accomplished by firing bark with coal in the No. 10 boiler. The facility is located at 1915 Wigmore Street, Jacksonville, Florida in Duval County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-212 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, Florida Statutes and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue 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. 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 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.

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. 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 their 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, Florida Statutes.

The Petition shall contain the following information;

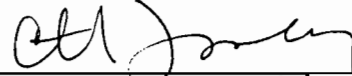
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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 intent. 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 receipt of this intent 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.

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, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 2/18/94 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 2/18/94
Clerk Date

Copies furnished to:

J. Cole, NED
R. Roberson, AQD RESD (Duval Co.)
G. Tonn, JSC
J. Manning, P.E.
R. Caleen, O&H
J. Harper, U.S. EPA
G. Worley, U.S. EPA
J. Bunyak, NPS
B. Collom, GAPC

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's 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 it's Jacksonville facility from 441 MMBtu per hour to 540 MMBtu per hour. This permit will not cause an exceedence 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.

Technical Evaluation
and
Preliminary Determination

Jefferson Smurfit Corporation
Duval County
Jacksonville, Florida

Construction Permit Modification
Permit Number: AC 16-234532

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

February 17, 1994

I. Application

A. Applicant

Jefferson-Smurfit Corporation
Post Office Box 150
Jacksonville, Florida 32201

B. Project/Location/Classification

The Department received an application on July 16, 1993, to modify an existing permit by increasing the maximum allowable heat input from 441 MMBtu/hour to 540 MMBtu/hour for the No. 10 boiler at the applicant's facility in Jacksonville, Duval County, Florida. The maximum heat input will be increased by firing additional bark with coal. The applicant's container board facility (SIC Code 2621) is located at 1915 Wigmore Street. UTM coordinates of the site are Zone 17, 439.500 km E and 3,359.100 km N.

II. Project Description

Jefferson-Smurfit Corporation has submitted an application to modify a federally enforceable permit condition in an existing permit for the No. 10 boiler at their Jacksonville facility by increasing the maximum heat input from 441 MMBtu/hour to 540 MMBtu/hour. The increase will be accomplished by firing additional bark in conjunction with coal. This modification would provide the facility with additional process steam for product manufacturing. Maximum fuel consumption and heat input for the boiler will be 30,600 lbs/hr. and 397 MMBtu/hr. for coal and 35,000 lbs/hr. and 143 MMBtu/hr. for bark. The facility will fire coal containing a maximum of 1.0% sulfur by weight. This modification will not require any physical changes to the operations but will include installing Selective Non-Catalytic Reduction (SNCR) equipment to reduce NO_x emissions.

III. Emissions

The source is comprised of a coal/bark fired boiler with a current heat input rate of 441 MMBtu/hour. The existing permit limits the emissions of the source as follows:

| | <u>lb/MMBtu</u> | <u>lb/hr</u> | <u>TPY</u> |
|-----------------|------------------------------|--------------|------------|
| PM | 0.10 | 44.1 | 152.0 |
| SO ₂ | | 289.5 | 1265.0 |
| NO _x | 0.70 | 308.7 | 1352.1 |
| VOC | | 61.0 | 144.0 |
| CO | | 65.0 | 170.0 |
| VE | 20% Opacity - Continuous | | |
| | 27% Opacity - 6 Minutes/Hour | | |

The applicant requested that the permit be revised to allow the maximum heat input to be increased to 540 MMBtu/hour by firing additional bark. At 540 MMBtu/hour heat input the maximum coal fuel consumption and heat input, from the coal fuel, to the boiler will be 30,600 lbs/hr and 397 MMBtu/hr. At 540 MMBtu/hour heat input the maximum bark fuel consumption and heat input, from bark fuel, to the boiler will be 35,000 lbs/hr and 143 MMBtu/hr.

The applicant requested the current allowable NO_x emission rate of 308.7 lb/hr and 1352.1 TPY at the new heat input of 540 MMBtu/hr. The applicant requested authorization to operate at the current allowable NO_x emissions rate for up to 18 months to provide time to design, procure and install controls to meet the applicant's proposed standard of .51 lb/MMBtu heat input. After review and coordination with the applicant, the need for a BACT determination was eliminated by limiting the annual NO_x emissions to 1200 TPY, which represents an annual NO_x emission increase less than the PSD significant emissions rate of 40 TPY.

IV. Rule Applicability

Based on the data from recent stack tests at the facility the increase in actual emissions (actual to allowable) for SO₂, PM/PM₁₀, VOC and CO emissions are less than the significant emission rates in Table 212.400-2 of Rule 17-212, F.A.C. Therefore the Prevention of Significant Deterioration Rule 17-212.400, F.A.C. and a Best Available Control Technology (BACT) determination pursuant to Rule 17-296.330, F.A.C., do not apply.

The proposed project is subject to preconstruction review in accordance with Chapter 403 of the Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-4, 17-210, 17-212, 17-292, 17-275, 17-296 and 17-297. The facility will be located in an area classified as attainment for all regulated pollutants (F.A.C. Rule 17-275.400) except ozone. The federal new source performance standards under 40 CFR 60 Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) applies to this source.

V. Technical Evaluation

The applicant has agreed to install Selective Non-Catalytic Reduction (SNCR) equipment to reduce NO_x emissions 12 months after the permit is issued. Once SNCR is operating actual NO_x emissions should be below the current permitted allowables.

The use of bark as fuel in the boiler will result in less coal being burned with lower emissions. It will also provide disposal of a potential solid waste.

VI. Air Quality Impact Analysis

From a technical review of the application, the Department has determined that the requested modification of the construction permit for this facility will not have a detrimental impact on ambient air quality.

VII. Summary and Conclusion

Based on information provided by Jefferson-Smurfit Corporation the Department has reasonable assurance that the proposed modification, 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 Chapter 17-212 of the Florida Administrative Code.

WESTON LEWIS
REGISTERED ENGINEER
STATE OF FLORIDA
NO. 4755
WHL



Florida Department of Environmental Protection

Lawton Chiles
Governor

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 : May 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:

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 the General and Specific Conditions.

Attachments are listed below:

1. Construction Permit Modification Application received on July 16, 1993.
2. Incompleteness letter to JSC on August 11, 1993.
3. JSC response to incompleteness letter received on September 20, 1993.
4. Letter Fancy to Harper November 29, 1993, requesting guidance on delaying BACT should application be subject to PSD review.

PERMITTEE:
Jefferson-Smurfit Corp.

Permit Number: AC 16-234532
Expiration Date: May 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.

PERMITTEE:
Jefferson-Smurfit Corp.

Permit Number: AC 16-234532
Expiration Date: May 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.

PERMITTEE:
Jefferson-Smurfit Corp.

Permit Number: AC 16-234532
Expiration Date: May 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.

PERMITTEE:
Jefferson-Smurfit Corp.

Permit Number: AC 16-234532
Expiration Date: May 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 the 1200 TPY.
2. SNCR controls shall be installed and operational at the facility no later than twelve months after the issuance date of this permit modification.
3. The NO_x emissions are limited to 1200 TPY in any consecutive twelve month period. 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 and operational but 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 950 TPY.
6. The allowable CO emissions are limited to 65.0 lb/hr and 170.0 TPY.
7. The allowable PM/PM₁₀ emissions are limited to 24.0 lb/hr, 105.0 TPY and 0.04 lb/MMBtu.
8. The allowable VOC emissions are limited to 38.0 lb/hr and 166.4 TPY.
9. The owner shall report emissions of NO_x as determined by Continuous Emission Monitor (CEM) and calculated by 40 CFR 60.44b(b) to the local program (RESO) and the NE district office by the 15th of each month for the preceding month of operation until the SNCR is operational.

PERMITTEE:
Jefferson-Smurfit Corp.

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

SPECIFIC CONDITIONS:

10. Only coal containing 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, respectfully, 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 SO₂. 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> | <u>*Test Method</u> |
|-----------------------------------|-----------------|----------------------------|
| 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).

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.

PERMITTEE:
Jefferson-Smurfit Corp.

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

SPECIFIC CONDITIONS:

16. Any revision(s) to a permit (and application) shall be submitted and approved prior to implementing the change.

17. Control equipment shall be provided with a method of access that is safe and readily accessible.

18. Stack sampling facilities shall be required and shall comply with the requirements of Rule 17-297.345, FAC.

19. 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.

20. This source may operate continuously, 8760 hours per year.

21. Continuous monitoring equipment shall be installed, maintained, calibrated, and operated in accordance with 40 CFR 60.13, 40 CFR 60.45, and 40 CFR 60, Appendix B for the following pollutants:

- (A) Sulfur dioxide
- (B) Nitrogen oxides
- (C) Oxygen

22. 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).

23. 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

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.

24. For the purpose of this permit, an excess emission is defined in accordance with 40 CFR 60.45(g).

25. Jefferson Smurfit Corporation shall combust off-gases from the brown steel 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 50.284(b)(1).

PERMITTEE:
Jefferson-Smurfit Corp.

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

SPECIFIC CONDITIONS:

26. Jefferson Smurfit Corporation shall not operate Power Boiler No. 10 without the particulate matter and sulfur dioxide pollution control device operating properly.

27. 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.

28. 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.

29. For inventory purposes the net contemporaneous emissions change (actual allowable) are increased as follows:

| | |
|---------------------|----------|
| NO _x | 36 TPY |
| PM/PM ₁₀ | 14.4 TPY |
| VOC | 37.4 TPY |

30. 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 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
of _____, 1994

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Howard L. Rhodes
Director
Division of Air Resources
Management



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

December 14, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Permit Application for Modification
AC 16-234532 (PSD-FL-207)
No. 10 Power Boiler

Dear Mr. Elder:

Your responses to our October 12, 1993 incompleteness letter were received on November 19, 1993. Our review of the responses determined that the information/request you provided as an alternative to the Best Available Control Technology (BACT) determination for NO_x raised issues requiring additional information. When this information is received we will continue processing the application.

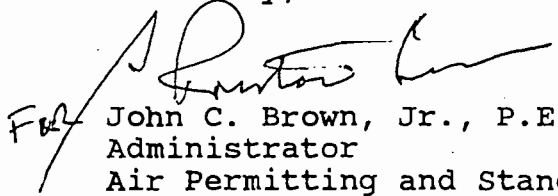
On November 29, 1993 U.S. EPA., Region IV (refer to attached letter) was asked to determine if a construction permit can be issued with a "temporary interim emission rate" which exceeds the significant emission rate for NO_x (40 TPY) without being subject to PSD/BACT determination for NO_x and modeling.

The application will be considered incomplete until EPA's determination is received or the request in your October 12, 1993 response letter is withdrawn.

Mr. Hollis H. Elder
Jefferson-Smurfit Corporation
AC 16-234532 (PSD-FL-207)
Permit Modification
December 14, 1993
Page 2 of 2

If you have any questions, please call Preston Lewis or Charles Logan at (904)488-1344, or write to me at the above address.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Air Permitting and Standards

JCB/CSL

cc: J. Cole, NE. Dist.
R. Roberson, DCRESO
G. Tonn, JSC
J. Manning, P.E.
J. Harper, U.S. EPA.
J. Bunyak, NPS
B. Collom, GAPC

Is your RETURN ADDRESS completed on the reverse side?

| | | | |
|---|--|---|--|
| SENDER: <ul style="list-style-type: none"> • 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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee. | |
| 3. Article Addressed to: Mr. Hollis H. Elder Vice President & General Mgr. Jefferson-Smurfit Corporation Post Office Box 150 Jacksonville, Florida 32201 | | 4a. Article Number P 872 562 509 | |
| 5. Signature (Addressee) | | 4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise | |
| 6. Signature (Agent) <i>Vince Adams</i> | | 7. Date of Delivery 12-20-93 | |
| | | 8. Addressee's Address (Only if requested and fee is paid) | |

Thank you for using Return Receipt Service.

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

P 872 562 509



Receipt for Certified Mail

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

PS Form 3800, JUNE 1991

| | |
|---|----|
| Sent to Mr. Hollis H. Elder | |
| Street and No. P. O. Box 150 | |
| P.O., State and ZIP Code Jacksonville, FL 32201 | |
| 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: 12/14/93 AC 16-234532 (PSD-FL-207) | |



Florida Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 29, 1993

Ms. Jewell Harper, Chief
Air Enforcement Branch
U.S. EPA., Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Ms. Harper:

This letter serves to follow up a telephone conversation with Mr. Scott Davis regarding a request by Jefferson Smurfit Corporation (JSC) to modify an air construction permit. The modification would increase the maximum heat input of the No. 10 boiler at their Jacksonville facility from 441 MMBtu/hr to 540 MMBtu/hr. In conjunction with this increase in heat input JSC has agreed to decrease their maximum allowable NO_x emissions rate from 308.7 lb/hr, which is their current allowable, to a new emission rate of 274.9 lb/hr, which is 39.9 tons per year above their current actual. JSC has requested that they be allowed to operate at a temporary interim NO_x emission rate which will not exceed their current allowable of 308.7 lb/hr while determining and implementing the appropriate NO_x controls (refer to attachment). JSC will decrease the NO_x emissions to the permit allowable of 274.9 lb/hr during the term of the permit which will not exceed 18 months. It should be noted that 308.7 lb/hr is 188.1 tons per year above the past actuals.

We have requested a determination from EPA as to whether or not we can issue a construction permit with a temporary interim emission rate, which is greater than the significant NO_x emission rate of 40 tons per year, without following the PSD permit process, including a BACT determination. We would appreciate a response as soon as possible and if you have any questions please call Charles Logan at (904)488-1344.

Sincerely,

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

Attachment
CHF/csl



JEFFERSON SMURFIT CORPORATION

November 11, 1993

Containerboard Mill Division

1915 WIGMORE STREET
P.O. BOX 150
JACKSONVILLE, FL 32201
TELEPHONE: 904/353-3611

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulations
Division of Air Resources Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-5400

RECEIVED

NOV 19 1993

Division of Air
Resources Management

SUBJECT: NO. 10 COAL/BARK BOILER
PERMIT NO. AO16-185036
JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL

Dear Mr. Fancy:

After carefully considering comments from your staff and other information available to us, we have reassessed our position on controlling NO_x emission from No. 10 Boiler. By this letter we are revising our application to modify the construction and operation permits for the subject boiler.

Since it has become clear that some reduction of NO_x emission is appropriate to complete this modification, we propose a new NO_x emission limit of 274.9 lb/hr and 1203.9 tons/year, which equates to a rate of 0.51 lb/MMBtu at 540 MMBtu/hr heat input. This is a reduction of 148.2 tons/year from the current allowable emissions, and an increase of less than 40 tons/year from current actual emissions as supported by the attached calculations. Since this would not be a significant net emissions increase as defined in FAC 17-212.400(2)(e)2., the modification would not be subject to PSD/BACT review for NO_x.

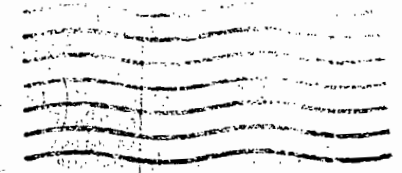
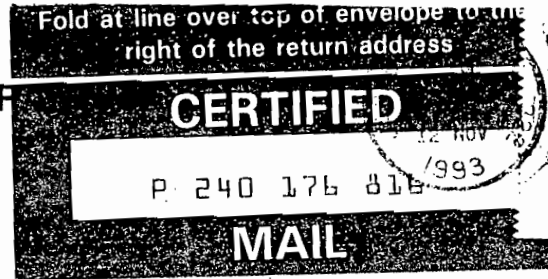
To meet this tighter NO_x emission limit, Jefferson Smurfit Corporation (JSC) may have to implement new NO_x control measures on the boiler, which at this time has not been determined. As you know, the selection and installation process for new control measures requires a thorough evaluation of the options available; the appropriation of the money for the project once an option is selected; and time for the engineering, installation if necessary, debugging, and testing. The entire process may take up to 18 months, depending on the technology selected.

As you recall, the main reason for this modification is one of economics critical to the



JEFFERSON SMURFIT CORPORATION

1915 WIGMORE STREET, P.O. BOX 150, JACKSONVILLE, FL 32201



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulations
Division of Air Resources Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-5400

33742-4512



No. 10 Coal/Bark Boiler
Permit No. AO16-185036
Jefferson Smurfit Corp.
PAGE 2

future operation of this mill. With this in mind, we urgently request that JSC be allowed to operate No. 10 Boiler at the requested higher heat input rate of 540 MMBtu/hr until an appropriate NO_x control measure is determined and implemented. During this interim period not to exceed 18 months from the date the permit is issued, we would agree to operate within the current allowable emission rate of 308.7 lb/hr and 0.7 lb/MMBtu, as set for the current maximum heat input rate.

In researching information relating to this project, we have found a lack of clear guidance on projecting NO_x emissions from combination coal/bark-fired boilers. Emission factors in AP-42 address the generation of NO_x for each fuel separately, but do not address the effects of mixing the fuels at varying ratio on the generation of NO_x.

In order to characterize the NO_x emissions from this specific boiler under the proposed operating conditions, we request that JSC be permitted to immediately begin operating the No. 10 Boiler at the requested higher heat input rate of 540 MMBtu/hr until the modified construction permit is issued. This interim time period will allow JSC to learn to operate the boiler under the new operating conditions and to conduct NO_x emission tests to clearly define the emission rates prior to beginning the evaluation of the various NO_x control systems. Because the increase in heat input will be from bark and because burning bark results in low NO_x emissions, we anticipate that NO_x emissions will not increase significantly, if at all, during this testing period.

We sincerely appreciate DEP's assistance throughout this process. We believe that this revision to our application will resolve all outstanding issues and that the permits can be processed without further delay.

Sincerely,



Hollis H. Elder
Vice President & General Manager

CR# P 240 176 816

td:\permits\#10revis.ltr

cc: C. Fogans
E. Halladay
P. Seamus
J. Cole, NE Dist
R. Robinson, Duval Co.
G. Harper, EPA
A. Bushnell, NPS

Jefferson-Smurfit Corporation

No. 10 Boiler

NOx Emission Calculations

Current Actual Emissions -

$$E = \frac{274.89 \text{ lb}}{\text{hr}} \times \frac{8,742 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2,000 \text{ lb}} = \frac{1,164 \text{ tons}}{\text{yr}}$$

Future Allowable Emissions -

$$E = \left[\frac{1,164 \text{ tons}}{\text{yr}} + \frac{39.9 \text{ tons}}{\text{yr}} \right] \times \frac{\text{yr}}{8,760 \text{ hr}} \times \frac{2,000 \text{ lb}}{\text{ton}} = \frac{274.9 \text{ lb}}{\text{hr}}$$

(or) 0.51 lb/MMBtu at the maximum heat input rate of 540 MMBtu/hr.



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

October 12, 1992 ^{TYPO}

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Permit Application for Modification
AC 16-234532 (PSD-FL-207)
No. 10 Power Boiler

Dear Mr. Elder:

Your responses to our August 13, 1993 incompleteness letter were received on September 20, 1993. Subsequent to our review of the responses it was determined that the information you provided for the Best Available Control Technology (BACT) for NO_x was incomplete. On October 8, 1993 we received additional information, which was requested during a telephone call, concerning the BACT for NO_x. The information is not adequate to complete the a BACT determination.

To continue our review of the subject application provide us with the following information:

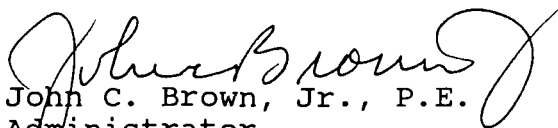
- 1) Additional detail in the cost analysis showing the specific costs used to derive the \$900 per ton of NO_x removed. The cost analysis should follow the general procedures specified in the EPA 45013-90-006, QAQPS Control Cost Manual.

Mr. Hollis H. Elder
Jefferson-Smurfit Corporation
AC 16-234532 (PSD-FL-207)
Permit Modification
October 12, 1993
Page 2 of 2

2) Provide information and data to support the 30 ppm of Ammonia emissions if SNCR were used while this source were being operated. This information should include NO_x removal efficiency associated with incremental increases of ammonia emissions from 5 ppm to 30 ppm (ie. 5-10 ppm, 10-20 ppm, and 20-30 ppm). Update the economics for each scenario (\$/ton of NO_x removed)

If you have any questions, please call Doug Outlaw or Charles Logan at (904) 488-1344, or write to me at the above address.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Air Permitting and Standards

CHF/CSL


cc: J. Cole, NE. Dist.
R. Roberson, DCRESO
G. Tonn, JSC
J. Manning, P.E.
J. Harper, U.S. EPA.
J. Bunyak, NPS
B. Collom, GAPC

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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee. | |
| 3. Article Addressed to: Mr. Hollis H. Elder Vice President and General Manager Jefferson-Smurfit Corporation Post Office Box 150 Jacksonville, Florida 32201 | | 4a. Article Number P 872 562 480 | |
| | | 4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise | |
| | | 7. Date of Delivery 10-12-93 | |
| 5. Signature (Addressee) <i>Hollis H. Elder</i> | | 8. Addressee's Address (Only if requested and fee is paid) | |
| 6. Signature (Agent) | | | |

Thank you for using Return Receipt Service.

P 872 562 480



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

| | |
|---|----|
| Sent to Mr. Hollis H. Elder | |
| Street and No. P. O. Box 150 | |
| P.O., State and ZIP Code Jacksonville, FL 32201 | |
| 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: 10/12/93
 AC 16-234532

PS Form 3800, JUNE 1991



United States Department of the Interior

NATIONAL PARK SERVICE
AIR QUALITY DIVISION
P.O. BOX 25287
DENVER, CO 80225

FACSIMILE

DATE: 10/6 TIME: _____

FAX PHONE NO. (303) 969-2822

NUMBER OF PAGES TO FOLLOW: 1

TO: Cleve Holladay
PHONE: (904) 488-1344

FROM: Ellen Porter
PHONE: (303) 969-2617

SUBJECT: JEFFERSON SMURFIT

REMARKS: _____

Note

October 6, 1993

To: Cleve Holladay


From: Ellen Porter

Subject: Jefferson-Smurfit, Corp.

We have reviewed the material forwarded to us regarding Jefferson-Smurfit, Corporation's (JSC) PSD permit application. We agree that the proposed controls represent BACT for SO₂ and NO_x. We agree that the VISCREEN analysis indicates that there would be low potential for plume impacts at Okefenokee and Wolf Island Wilderness Areas.

As I mentioned in our conversation of Oct. 4, JSC misuses the NPS/FWS significant impact levels in the AQRV analysis. These levels are not to be used to determine whether a cumulative AQRV analysis is to be done. These levels are only to be used to determine if the source would contribute significantly to an increment violation. It is the federal land manager's responsibility to decide the extent of an AQRV analysis. In this case, since the source refers to the Seminole Kraft, Corp. AQRV analysis (which was adequate), and no new information has been received regarding AQRVs in the areas since that analysis, we find JSC's analysis to be adequate.

Please forward your preliminary determination when it is available.



Ellen Porter



JEFFERSON SMURFIT CORPORATION

September 16, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

SUBJECT: NO. 10 COAL/BARK BOILER
PERMIT NO. AO16-185036
JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL

Dear Mr. Fancy:

This letter is to respond to your letter of August 13, 1993 requesting additional information to complete our application to modify the construction and operation permits for the subject boiler. The information is presented in the order it was requested.

We would like to stress that the proposed modification will involve no physical changes to the boiler or its control equipment. It is simply a paper change which will allow us to more economically generate power internally rather than purchasing it from an outside source. The boiler was designed to operate with the proposed mix of fuels and slightly higher steam production rate that this modification will accommodate. With that in mind, we offer the following response to your comments.

1. We selected the results of the February 27, 1991 test as our baseline for NO_x modeling because it is representative of normal operations and provides the most operational flexibility for the boiler. The difference between the 1991 test results and the 1992 test results is only four percent, which is well within normal operational variability and within the accuracy range of normal emissions testing.

As a practical matter, the difference in the ambient impact between the two emission rates is minor. Modeling the lower of the two rates will increase the maximum ambient concentration to 0.80 micrograms/cubic meter, up from the concentration of 0.61 at the higher emission rate, but still well below the significant impact level for Class II areas. For Class I areas, the incremental increase is even less significant.

Containerboard Mill Division

1915 WIGMORE STREET
P.O. BOX 150
JACKSONVILLE, FL 32201
TELEPHONE: 904/353-3611

RECEIVED

SEP 20 1993

Division of Air
Resources Management

No. 10 Coal/Bark Boiler
Jefferson Smurfit Corp.
Jacksonville Mill
PAGE 2

Another factor in the selection of the higher emission rate is the age of the boiler. It has been in operation for almost ten years, which is approximately one-third of its expected life. Due to normal depreciation, the NO_x emission tests results have shown an upward trend since 1987. This demonstrated need for operational flexibility, in conjunction with the negligible difference in the emission rates and the minor difference in the ambient impact, is adequate justification for selecting the 1991 emission test results as the baseline in our modeling.

2. Please see the enclosed "Review of Best Available Control Technology for Coal/Bark-fired Boilers."
3. Also enclosed, please find the "Air Quality Related Values Analysis and Visibility Screening Analysis" as requested.
4. EPA's comments regarding the BACT analysis have been addressed in Item 2 above. Also, the justification given in Item 1 regarding the choice of emission rates applies as well to the choice of years representing normal operation. More to the point, however, is the fact that years 1989, 1990, and 1991 were below normal. Equipment downtime was greater than normal due primarily to implementation of several significant mill modernization projects. As with any manufacturing process, the goal is 100% operation; however, any downtime for any reason except routine maintenance is considered not normal.

We trust this information adequately addresses your concerns, and we may proceed expeditiously to complete this project. If you need any further information, or if there is anything we can do to assist you in the process, please let me know.

Sincerely,



Hollis H. Elder
Vice President & General Manager

CR# P 240 176 808

td:\permits\rai#10mo.ltr

cc: C. Logan
C. Halladay
Q. Cole, NE Dist.
R. Robinson, DCA&D
G. Harper, EPA
G. Bumsak, NPS

REVIEW OF BEST AVAILABLE CONTROL TECHNOLOGY FOR COAL/BARK-FIRED BOILERS

PROJECT

Jefferson Smurfit Corporation (JSC) is proposing to modify the construction permit for its No. 10 Coal/Bark-fired boiler by increasing the allowable heat input rate from 441 MMBtu/hr to 540 MMBtu/hr. The change is being requested to accommodate the burning of more bark, which has a lower heating value than coal, while maintaining the same steam production rate. No physical modification to the boiler or ancillary equipment will occur. This modification triggers NSR for sulfur dioxide and oxides of nitrogen, thus, a BACT review is required for those pollutants.

SULFUR DIOXIDE

The current SO₂ controls on the boiler are low sulfur coal (<1%) and a caustic wet scrubber. The SO₂ laden gases are subjected to a caustic (NaOH) scrubbing solution in both the venturi scrubber and in the SO₂ absorber/demister tower downstream of the boiler.

The current SO₂ limit is 0.66 lb/MMBtu, which was the BACT determination when the original permit was issued. The vendor's efficiency guarantee for the scrubber system was 90% removal when burning 3.5% sulfur coal, which equated to an emission limit of 0.59 lb/MMBtu. This removal efficiency may not be attainable with the use of low sulfur coal, since the efficiency of an absorber system is directly dependent of the inlet pollutant concentration, and the existing system was designed for an inlet concentration at least 3.5 times greater than occurs currently. Also, with the increased use of bark as a fuel, the inlet SO₂ concentration will be even lower.

No other control technologies were considered in this review because the installation of any other control system would require:

- ◆ the physical removal of the existing system because there is no available space to accommodate a new system;
- ◆ the engineering, construction and installation of the new system; and
- ◆ extended downtime of the facility's power generation system while the two previous items are being completed.

Any of these three events for the purpose of a twenty to thirty percent reduction in SO₂ emissions would be economically unjustified; the three together, overwhelmingly so.

Review of Best Available Control Technology
For Coal/Bark-fired Boilers
Jefferson Smurfit Corp.
Jacksonville Mill
PAGE 2

JSC concludes that an SO₂ emission limit of 217 lb/hr (0.40 lb/MMBtu) is BACT for this boiler because:

- ◆ it represents a reduction from maximum potential emissions of 70.6% under worst case conditions (100% coal) and 60% reduction under expected normal operating conditions (47% coal, 53% bark, by weight) even while burning low sulfur coal;
- ◆ it is a 39% reduction from the current allowable rate, which was previously determined to be BACT, a 32% reduction from the minimum emission rate of 0.59 lb/MMBtu guaranteed by the vendor, and a 67% reduction from NSPS; and,
- ◆ it will not result in any significant ambient impacts in any Class I or II areas.

OXIDES OF NITROGEN

The current controls for NO_x are boiler design and good operation. This boiler was designed for, and the original BACT was set at, the NSPS emission limit of 0.7 lb NO_x/MMBtu.

A review of EPA's RACT/BACT/LAER Information Systems bulletin board revealed only two similar sources, i.e., combination coal and woodwaste/bark-fired boilers, subject to BACT application in the last five years: Union Camp (UC) pulp and paper mill in Eastover, SC; and Multitrade Limited Partnership (MLP) in Virginia. MLP selected SNCR-urea injection to control NO_x emissions to an allowable rate of 0.13 lb/MMBtu at an efficiency of 50%. The cost effectiveness of this system is reported to be \$4,380 per ton of NO_x removed.

BACT for the UC boiler was determined to be 0.50 lb/MMBtu based on boiler design and good operation.

Information on the application of other options for similar boilers was not available in the RACT/BACT/LAER Information System.

JSC proposes to retain its previous allowable emission rate of 308.7 lb/hr. At the new operating rate of 540 MMBtu/hr, this equates to a concentration of 0.57 lb/MMBtu, a 19% reduction below the previous limit and NSPS. Also:

Review of Best Available Control Technology
For Coal/Bark-fired Boilers
Jefferson Smurfit Corp.
Jacksonville Mill
PAGE 3

- ◆ considering the age of the boiler (10 years), 0.57 lb/MMBtu is reasonably equivalent to BACT set for the UC boiler, which is approximately 3 years old;
- ◆ the addition of add-on control equipment is not economically justified based on the MLP experience;
- ◆ the addition of add-on control equipment also is not feasible because there is no space available to accommodate a new system; and,
- ◆ there are no significant ambient impacts to any Class I or II areas at this emission rate.

AIR QUALITY RELATED VALUES ANALYSIS
and
VISUAL EFFECTS SCREENING ANALYSIS
for
JEFFERSON-SMURFIT CORPORATION
NO.10 COMBINATION BOILER

Prepared for:

Jefferson-Smurfit Corporation
1915 Wigmore Street
Jacksonville, Florida 32201

Prepared by:

James L. Manning, P.E.
5077 Toproyal Lane
Jacksonville, Florida 32211

August 1993

Introduction

Jefferson-Smurfit Corporation (JSC) is proposing to modify the construction permit for its No. 10 coal/bark-fired boiler to increase the heat input rate from 441 MMBtu/hr to 540 MMBtu/hr. The modification is subject to the PSD new source review rules for the pollutants sulfur dioxide and nitrogen oxides. As a result, the Florida DEP has requested an air quality related values analysis of the impacts of these emissions on the Okeefenokee and Wolf Island National Wilderness Areas. The analysis addresses the potential impacts on vegetation, soils, wildlife and the aquatic environment in those areas due to the proposed modification and other sources.

Air Quality Related Values

The Okeefenokee National Wilderness Area (NWA) is located approximately 58 kilometers (km) northwest of JSC, and Wolf Island NWA is located approximately 104 km north of JSC. Both areas have characteristics that are unique to the NWA, and that are typical of the surrounding area. The state of the wildlife, soils, vegetation and water resources is dependent to some extent on the quality of the air environment. The important aquatic, vegetation and wildlife characteristics which make these two areas deserving of special consideration are presented in Table 1. These characteristics, the air quality related values (AQRV), include all threatened and endangered plant and animal species, all other terrestrial vegetation, and some terrestrial wildlife that are indigenous to the areas. Threatened and endangered species associated with terrestrial habitats of the Okeefenokee and Wolf Island NWA are presented in Table 2.

Impact Analysis

The proposed modification to JSC's construction permit will result in significant net emissions increases for sulfur dioxide (SO₂) and nitrogen oxides (NO_x) under the PSD new source review rules. These emissions were modeled for impacts to the two NWAs of concern and were determined to be below the significant impact thresholds as set by the National Park Service (NPS) for Class I areas under their jurisdiction. This demonstrates that the increase in emissions from this modification will have a negligible effect on the AQRVs in the Okeefenokee and Wolf Island NWAs.

TABLE 1
Air Quality Related Values

| Location | Characteristic |
|------------------------|--|
| <u>Okeefenokee NWA</u> | <p>Aquatic: Blackwater rivers, ponds, sloughs.</p> <p>Vegetation: Cypress wetlands, wet flatwoods, bay-shrub bogs, basin marshes, mixed hardwood swamp, old-growth cypress swamp, epiphytic plants including bromeliads and orchids, lichens, and threatened and endangered species.</p> <p>Wildlife: Birds, mammals, reptiles, and amphibians; and threatened and endangered species.</p> |
| <u>Wolf Island NWA</u> | <p>Aquatic: Tidal creeks.</p> <p>Vegetation: Salt marshes, small marsh hammocks, and uplands.</p> <p>Wildlife: Birds, mammals, reptiles, and amphibians; and threatened and endangered species.</p> |

TABLE 2
Threatened and Endangered Wildlife Species
in the Okefenokee and Wolf Island NWAs

| Species | Designated Status | |
|-------------------------|--------------------|--------------------|
| | State ^a | USFWS ^b |
| Florida Black Bear | S4 | C2 |
| Arctic Peregrine Falcon | S1 | - |
| Bachman's Warbler | E | E |
| Bald Eagle | E | E |
| Piping Plover | S1/S2 | T |
| Red-cockaded Woodpecker | E | E |
| Wood Stork | S2 | E |
| American Alligator | - | T(S/A) |
| Atlantic Loggerhead | - | T |
| Eastern Indigo Snake | S3 | T |

^a State (Georgia) Status:

- E = endangered.
- S1 = regionally endangered.
- S2 = regionally threatened.
- S3 = regionally of concern.
- S4 = regionally apparently secure.

^b U.S. Fish and Wildlife Service Status:

- C2 = candidate for listing with some evidence of vulnerability, but for which not enough data exists to support listing.
- E = endangered.
- T = threatened.
- T(S/A) = threatened due to similarity of appearance.

Sources: U.S. Fish and Wildlife Service
Georgia Freshwater Wetlands and Heritage Inventory Program

In recent months, two other AQRV analyses were performed for these same two Class I areas, one for Seminole Kraft Corporation's (SKC) new package boilers and one for the Cedar Bay cogeneration plant (CBCP). The thorough evaluation performed for the SKC project concluded that "...large margins of safety exist for all matrices examined with respect to the effects of SO₂...on the wilderness areas" from all sources in Duval County. Considering that JSC is proposing an SO₂ emission limit that is 25% below the emission rate used in the SKC modeling, and considering that the actual emission rate will be well below the allowable rate, it is safe to conclude that the AQRVs will not be negatively impacted by JSC's proposed modification.

As with SO₂, the modeled impacts of the NOx emissions indicates that the JSC modification also will not have a significant effect on the AQRVs. This agrees with the conclusion reached in the CBCP analysis of their impacts. Again, considering that the modeling predicts impacts at maximum allowable emissions under worst-case meteorological conditions, and that JSC's actual emissions will be below the allowable, it is safe to conclude that the AQRVs will not be negatively impacted by the modification.

Visual Effects Screening Analysis

As requested by DEP, an analysis was performed on the possible effects the modification may have on the visibility conditions in the Okeefenokee and Wolf Island NWAs. Using EPA's VISCREEN model, a Level 1 screening analysis was done for the pollutants particulate matter and NOx. The results presented in Figures 1, 2 and 3 indicate that the Level 1 screening criteria will not be exceeded for either pollutant. The model was run for the Okeefenokee NWA using background visual range values of both 25 and 40 km (Figures 1 and 2) because of the proximity of the regional boundary to the boundary of the NWA. The conclusion is that the modification will cause negligible visibility impairment inside or outside the Class I areas.

FIGURE 1

Visual Effects Screening Analysis
 Source: Jefferson-Smurfit Corporation
 Class I Area: Okefenokee NWA

*** Level-1 Screening ***
 Input Emissions for

| | | |
|--------------|--------|--------|
| Particulates | 24.30 | LB /HR |
| NOx (as NO2) | 308.70 | LB /HR |
| Primary NO2 | .00 | LB /HR |
| Soot | .00 | LB /HR |
| Primary SO4 | .00 | LB /HR |

**** Default Particle Characteristics Assumed

Transport Scenario Specifications:

| | |
|-------------------------------|---------------|
| Background Ozone: | .04 ppm |
| Background Visual Range: | 25.00 km |
| Source-Observer Distance: | 58.00 km |
| Min. Source-Class I Distance: | 58.00 km |
| Max. Source-Class I Distance: | 106.00 km |
| Plume-Source-Observer Angle: | 11.25 degrees |
| Stability: | 6 |
| Wind Speed: | 1.00 m/s |

R E S U L T S

Asterisks (*) indicate plume impacts that exceed screening criteria

Maximum Visual Impacts INSIDE Class I Area
 Screening Criteria ARE NOT Exceeded

| Backgrnd | Theta | Azi | Distance | Alpha | Delta E | | Contrast | |
|----------|-------|-----|----------|-------|---------|-------|----------|-------|
| | | | | | Crit | Plume | Crit | Plume |
| SKY | 10. | 84. | 58.0 | 84. | 2.00 | .603 | .05 | -.002 |
| SKY | 140. | 84. | 58.0 | 84. | 2.00 | .188 | .05 | -.004 |
| TERRAIN | 10. | 84. | 58.0 | 84. | 2.00 | .050 | .05 | .001 |
| TERRAIN | 140. | 84. | 58.0 | 84. | 2.00 | .014 | .05 | .001 |

Maximum Visual Impacts OUTSIDE Class I Area
 Screening Criteria ARE NOT Exceeded

| Backgrnd | Theta | Azi | Distance | Alpha | Delta E | | Contrast | |
|----------|-------|-----|----------|-------|---------|-------|----------|-------|
| | | | | | Crit | Plume | Crit | Plume |
| SKY | 10. | 70. | 55.1 | 99. | 2.00 | .633 | .05 | -.002 |
| SKY | 140. | 70. | 55.1 | 99. | 2.00 | .197 | .05 | -.004 |
| TERRAIN | 10. | 55. | 51.9 | 114. | 2.00 | .068 | .05 | .001 |
| TERRAIN | 140. | 55. | 51.9 | 114. | 2.00 | .019 | .05 | .001 |

FIGURE 2

Visual Effects Screening Analysis
 Source: Jefferson-Smurfit Corporation
 Class I Area: Okeefenokee NWA

*** Level-1 Screening ***
 Input Emissions for

| | | |
|--------------|--------|--------|
| Particulates | 24.30 | LB /HR |
| NOx (as NO2) | 308.70 | LB /HR |
| Primary NO2 | .00 | LB /HR |
| Soot | .00 | LB /HR |
| Primary SO4 | .00 | LB /HR |

**** Default Particle Characteristics Assumed

Transport Scenario Specifications:

| | |
|-------------------------------|---------------|
| Background Ozone: | .04 ppm |
| Background Visual Range: | 40.00 km |
| Source-Observer Distance: | 58.00 km |
| Min. Source-Class I Distance: | 58.00 km |
| Max. Source-Class I Distance: | 106.00 km |
| Plume-Source-Observer Angle: | 11.25 degrees |
| Stability: | 6 |
| Wind Speed: | 1.00 m/s |

R E S U L T S

Asterisks (*) indicate plume impacts that exceed screening criteria

Maximum Visual Impacts INSIDE Class I Area
 Screening Criteria ARE NOT Exceeded

| Backgrnd | Theta | Azi | Distance | Alpha | Delta E | | Contrast | |
|----------|-------|-----|----------|-------|---------|-------|----------|-------|
| | | | | | Crit | Plume | Crit | Plume |
| SKY | 10. | 84. | 58.0 | 84. | 2.00 | 1.402 | .05 | -.003 |
| SKY | 140. | 84. | 58.0 | 84. | 2.00 | .501 | .05 | -.008 |
| TERRAIN | 10. | 84. | 58.0 | 84. | 2.00 | .211 | .05 | .003 |
| TERRAIN | 140. | 84. | 58.0 | 84. | 2.00 | .072 | .05 | .002 |

Maximum Visual Impacts OUTSIDE Class I Area
 Screening Criteria ARE NOT Exceeded

| Backgrnd | Theta | Azi | Distance | Alpha | Delta E | | Contrast | |
|----------|-------|-----|----------|-------|---------|-------|----------|-------|
| | | | | | Crit | Plume | Crit | Plume |
| SKY | 10. | 60. | 53.0 | 109. | 2.00 | 1.503 | .05 | -.003 |
| SKY | 140. | 60. | 53.0 | 109. | 2.00 | .535 | .05 | -.009 |
| TERRAIN | 10. | 50. | 50.7 | 119. | 2.00 | .285 | .05 | .004 |
| TERRAIN | 140. | 50. | 50.7 | 119. | 2.00 | .098 | .05 | .003 |

FIGURE 3

Visual Effects Screening Analysis
 Source: Jefferson-Smurfit Corporation
 Class I Area: Wolf Island NWA

*** Level-1 Screening ***

Input Emissions for

| | | |
|--------------|--------|--------|
| Particulates | 24.30 | LB /HR |
| NOx (as NO2) | 308.70 | LB /HR |
| Primary NO2 | .00 | LB /HR |
| Soot | .00 | LB /HR |
| Primary SO4 | .00 | LB /HR |

**** Default Particle Characteristics Assumed

Transport Scenario Specifications:

| | |
|-------------------------------|---------------|
| Background Ozone: | .04 ppm |
| Background Visual Range: | 40.00 km |
| Source-Observer Distance: | 104.00 km |
| Min. Source-Class I Distance: | 104.00 km |
| Max. Source-Class I Distance: | 109.00 km |
| Plume-Source-Observer Angle: | 11.25 degrees |
| Stability: | 6 |
| Wind Speed: | 1.00 m/s |

R E S U L T S

Asterisks (*) indicate plume impacts that exceed screening criteria

Maximum Visual Impacts INSIDE Class I Area
 Screening Criteria ARE NOT Exceeded

| Backgrnd | Theta | Azi | Distance | Alpha | Delta E | | Contrast | |
|----------|-------|-----|----------|-------|---------|-------|----------|-------|
| | | | | | Crit | Plume | Crit | Plume |
| SKY | 10. | 84. | 104.0 | 84. | 2.00 | .200 | .05 | -.001 |
| SKY | 140. | 84. | 104.0 | 84. | 2.00 | .067 | .05 | -.002 |
| TERRAIN | 10. | 84. | 104.0 | 84. | 2.00 | .018 | .05 | .000 |
| TERRAIN | 140. | 84. | 104.0 | 84. | 2.00 | .005 | .05 | .000 |

Maximum Visual Impacts OUTSIDE Class I Area
 Screening Criteria ARE NOT Exceeded

| Backgrnd | Theta | Azi | Distance | Alpha | Delta E | | Contrast | |
|----------|-------|-----|----------|-------|---------|-------|----------|-------|
| | | | | | Crit | Plume | Crit | Plume |
| SKY | 10. | 70. | 98.9 | 99. | 2.00 | .209 | .05 | -.001 |
| SKY | 140. | 70. | 98.9 | 99. | 2.00 | .070 | .05 | -.002 |
| TERRAIN | 10. | 55. | 93.1 | 114. | 2.00 | .023 | .05 | .000 |
| TERRAIN | 140. | 55. | 93.1 | 114. | 2.00 | .007 | .05 | .000 |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

AUG 19 1993

RECEIVED

AUG 27 1993

Division of Air
Resources Management

4APT-AEB

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

RE: Jefferson Smurfit Corporation (PSD-FL-207)

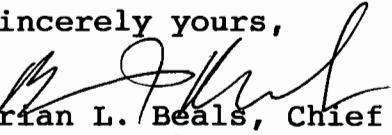
Dear Mr. Fancy:

As requested in your letter dated July 19, 1993, we have reviewed the Prevention of Significant Deterioration (PSD) permit application for a proposed modification to the above referenced source for completeness. The applicant proposes to increase the heat input to an existing coal/wood-fired boiler. As discussed between Mr. Charles Logan of your staff and Mr. Gregg Worley of my staff on August 13, 1993, we have the following comments.

1. The applicant used the operating hours for the years 1988 and 1992 for calculating existing actual emissions. PSD regulations require that the average emissions, in tons per year, of the two-year period preceding the proposed change be used to determine actual emissions. Where the reviewing authority makes a determination that the two-year period preceding the change is not representative of normal unit operation, another two-year period may be used. EPA's historical position has been that the alternate two-year period must occur within the contemporaneous time period and must be two consecutive years. An applicant is not allowed to simply pick any two years with the most hours of operation. Unless your agency makes a determination that the years 1991 and 1992 are not representative of normal unit operation, those years should be used to calculate actual emissions.
2. The BACT analysis presented by the applicant does not meet the regulatory requirements for a case-by-case control technology determination considering energy, economic and other environmental impacts. A cursory statement that BACT for the boiler should be the same as was determined in 1981 is not sufficient.

Thank you for the opportunity to review and comment on the completeness of this application. If you have any questions on these comments, please contact Mr. Gregg Worley of my staff at (404) 347-5014.

Sincerely yours,


Brian L. Beals, Chief
Source Evaluation Unit
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: C. Logan
C. Holladay
D. Cole, WE Dist
R. Robinson, DCA&D
J. Bunyal, NPS
B. Collom, GAPE
G. Sonn, JSE
G. Manning, PE



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

August 13, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Permit Application for Modification
AC 16-234532 (PSD-FL-207)
No. 10 Power Boiler

Dear Mr. Elder:

Your permit application to modify the No. 10 power boiler was received on July 16, 1993, and is deemed incomplete based on a technical review of the proposal. Therefore, submit the following information to the Department's Bureau of Air Regulation, including all assumptions, reference material and calculations, at which time the review of this proposal will resume:

1. Provide modeling results that use a baseline actual average NO_x emission rate of 264.25 lbs/hr (March 6, 1992 Test Results), or provide adequate justification for using 274.89 lbs/hr (February 27, 1991 Test Results) as the baseline in your modeling.
2. Pursuant to Rule 17-212.410, F.A.C., provide an updated BACT Determination which demonstrates that the existing "Method of Controls" are BACT for the pollutants subject to PSD New Source Review.
3. Provide an air quality-related values (AQRV) analysis for the Okefenokee and Wolf Island Class I areas for all pollutants predicted to be emitted in PSD significant amounts (SO₂ and NO_x for this application). The potential effects on visibility, vegetation, wildlife, soils and aquatic resources, should be evaluated. Since the modeled impacts for this project are below the National Park Service

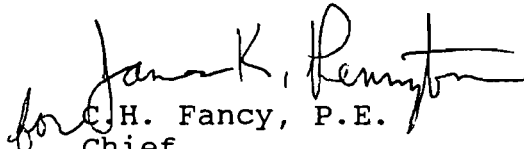
Mr. Hollis H. Elder
Jefferson-Smurfit Corporation
AC 16-234532 (PSD-FL-207)
Permit Modification
August 13, 1993
Page 2 of 2

significant impact levels, a literature review will be sufficient for determining potential effects on vegetation, wildlife, soils and aquatic resources. However, the visibility impact analysis requires the use of the VISCREEN model to predict the impacts due to the proposed emissions increase.

4) Two comments were received verbally from Mr. Gregg Worley with the U.S. EPA, Region IV. The first comment is that there needs to be justification for use of any other years beyond the last two years of operation for calculating actual pollutant emissions. Secondly, the BACT Determination for a previous construction permit does not meet PSD control technology analysis requirements for this proposal. If any previous response adequately addresses EPA's concerns, please reference the response and it will not be necessary to restate the response.

If you have any questions, please call Cleve Holladay or Charles Logan at (904) 488-1344, or write to me at the above address.

Sincerely,


C.H. Fancy, P.E.
Chief

Bureau of Air Regulation

CHF/CSL

cc: J. Cole, NE. Dist.
R. Roberson, DCRESO
G. Tonn, JSC
J. Manning, P.E.
J. Harper, U.S. EPA.
J. Bunyak, NPS
B. Collom, GAPC

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. Hollis H. Elder,
 Vice President and Gen. Mgr.
 Jefferson Smurfit Corp.
 P. O. Box 150
 Jacksonville, FL 32201

4a. Article Number
 P 230 524 397

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

7. Date of Delivery
 8-26-93

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

5. Signature (Addressee)
Vince Ward
 6. Signature (Agent)

Thank you for using Return Receipt Service.

DOMESTIC RETURN RECEIPT

P 230 524 397



Receipt for Certified Mail

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

| | |
|---|----|
| Sent to Mr. Hollis H. Elder, JSC | |
| Street and No. P. O. Box 150 | |
| P.O., State and ZIP Code Jacksonville, FL 32211 | |
| 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: 8-13-93 Permit: AC 16-234532 PSD-FL-207 | |

PS Form 3800, June 1991



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

August 13, 1993

Mr. R. H. Collom, Jr., Chief
Air Protection Branch
Environmental Protection Division
Georgia Department of Natural Resources
270 Washington Street, S.W.
Atlanta, GA 30334

Dear Mr. Collom:

RE: Jefferson Smurfit Corporation
No. 10 Power Boiler
Duval County, PSD-FL-207

Enclosed for your information is the above referenced PSD application package. We will send you a copy of the Bureau of Air Regulation's proposed final action on this project when it is available. If you have any questions or comments, please contact Charles Logan or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,

Patricia G. Adams

for C. H. Fancy, P.E.
Chief

Bureau of Air Regulation

CHF/pa

Enclosures

RECEIVED

AUG 19 1993



JEFFERSON SMURFIT CORPORATION

Division of Air Resources Management

August 12, 1993

Containerboard Mill Division

1915 WIGMORE STREET

P.O. BOX 150

JACKSONVILLE, FL 32201

TELEPHONE 904/353-3611

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RECEIVED

AUG 1 1993

Division of Air Resources Management

Mr. Cleve Holladay
Meteorologist
Permitting and Standards Section
Division of Air Resources Management
Department of Environmental Protection
2400 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJECT: NO.10 COAL/BARK BOILER
PERMIT NO. AO16-185036
JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL

Dear Mr. Holladay:

In response to your request, an Air Modeling Data Summary was prepared by our consultant, Jim Manning. A copy of this summary was sent to you by fax on August 11. Attached is a hard copy to be included with the package of modeling results submitted to the Department on July 14, 1993.

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 240 176 797

td:\permits\airmodel.ltr

cc: C. Fagan
C. Holladay
G. Cole, WE Dept
R. Robinson, DEAQD } 8-19-93
G. Harper, EPA
D. Buntz
R. Colborn, GA DNR

JEFFERSON-SMURFIT CORPORATION
NO. 10 COAL/BARK BOILER

AIR MODELING DATA SUMMARY

| Averaging period | Significant impact value | Highest Modeled Value | | | | |
|-------------------------------|-----------------------------|-----------------------|-------|-------|-------|-------|
| | | 1983 | 1984 | 1985 | 1986 | 1987 |
| <u>Sulfur Dioxide</u> | | | | | | |
| <u>Class II Areas</u> | | | | | | |
| Annual | 1.0 | 0.27 | 0.25 | 0.26 | 0.26 | 0.29 |
| 3-hour | 25.0 | 10.0 | 9.39 | 8.87 | 8.32 | 10.4 |
| 24-hour | 5.0 | 3.94 | 3.55 | 3.54 | 4.84 | 3.38 |
| <u>Class I Areas</u> | | | | | | |
| Annual | 0.025 | 0.002 | 0.003 | 0.003 | 0.003 | 0.003 |
| 3-hour | 0.48 | 0.27 | 0.31 | 0.36 | 0.21 | 0.30 |
| 24-hour | 0.069 | 0.068 | 0.050 | 0.063 | 0.063 | 0.053 |
| <u>Nitrogen Oxides</u> | | | | | | |
| <u>Class II Areas</u> | | | | | | |
| Annual | 1.0 | 0.55 | 0.51 | 0.53 | 0.55 | 0.61 |
| <u>Class I Areas</u> | | | | | | |
| Annual | 0.025 | 0.005 | 0.006 | 0.006 | 0.006 | 0.006 |

Note: All values are in units of micrograms/cubic meter.



Florida Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 19, 1993

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

Dear Ms. Harper:

RE: Jefferson Smurfit Corporation
No. 10 Coal/Bark Boiler
Duval County, PSD-FL-207

The Department has received the above referenced PSD application package. Please review this package and forward your comments to the Department's Bureau of Air Regulation by August 11, 1993. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact Charles Logan or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,

Patricia G. Adams

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

CHF/pa

Enclosures



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

July 19, 1993

Mr. John Bunyak, Chief
Policy, Planning and Permit Review Branch
National Park Service-Air Quality Division
P. O. Box 25287
Denver, CO 80225

Dear Mr. Bunyak:

RE: Jefferson Smurfit Corporation
No. 10 Coal/Bark Boiler
Duval County, PSD-FL-207

The Department has received the above referenced PSD application package. Please review this package and forward your comments to the Department's Bureau of Air Regulation by August 11, 1993. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact Charles Logan or Cleve Holladay at (904)488-1344 or write to me at the above address.

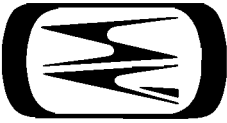
Sincerely,

Patricia G. Adams

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

CHF/pa

Enclosures



JEFFERSON SMURFIT CORPORATION

OVERNIGHT DELIVERY - AIRBORNE EXPRESS

July 14, 1993

Containerboard Mill Division

1915 WIGMORE STREET
P.O. BOX 150
JACKSONVILLE, FL 32201
TELEPHONE: 904/353-3611

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

SUBJECT: NO. 10 COAL/BARK BOILER
PERMIT NO. AO16-185036
JEFFERSON-SMURFIT CORPORATION
JACKSONVILLE MILL

RECEIVED

JUL 15 1993

Division of Air
Resources Management

1993 JUL 15 AM 10:47
RECEIVED
DEP - MAIL ROOM

Dear Mr. Fancy:

In response to your letter of January 22, 1993, please accept the enclosed package as an application to modify the construction and operation permits for the subject boiler. The package includes the cover letter explaining the modification and responding to the questions of your previous letter; a completed application form and supporting calculations; results of the modeling; and the application fee, Check No. 1131073 in the amount of \$7,500.00.

First, the responses to the questions in your previous letter:

- * There have been no physical modifications or reconstructions to the No. 10 Boiler since the original construction was completed.
- * The proposed modification will not affect the operation or emissions of any other source at this facility. The increase in the heat input rate will allow a greater use of bark, which is a more economical and an available fuel. Also, the increased heat input rate will allow a small increase in the steam production rate of the boiler which will result in an increase in electrical power generation which will reduce the need to purchase that power from outside the company.

As instructed by your office, this application package, including the modeling, has been prepared based on the premise of "past actuals vs. future allowables". For the hours of operation, the two years selected from the AORs submitted to DEP as representative from the last five are 1988 (8,488 hours) and 1992 (8,455 hours). The past actual emissions of each pollutant were then calculated using stack tests results accepted by DEP (copies included). Following is a pollutant-by-pollutant description of the permit modification application.

For **particulate matter** (PM-10), Jefferson-Smurfit Corporation (JSC) proposes to accept an emission limit of 24.3 lb/hr and 106.5 t/yr. Since this annual emission rate represents an increase of less than 15 t/yr above the past actual annual rate, further new source review requirements are not necessary. This new limit can be met under current operating conditions, as demonstrated by all previous stack tests; however, if necessary, the scrubber liquid to the venturi scrubber can be adjusted to insure continuous compliance.

For **sulfur dioxide** (SO₂), JSC proposes new emission limits of 217 lb/hr and 950.5 t/yr. This represents a reduction of almost 315 t/yr; however, it is still an increase of 97.5 t/yr above the past actual annual rate. Modeling of this emission rate does not result in a significant impact on ambient concentrations in Duval County, or in any Class I areas within 100 km. JSC requests that this rate be accepted as BACT because: the existing caustic scrubber represents state-of-the-art SO₂ control equipment; the scrubbing liquid rate to the caustic scrubber can be adjusted to insure continuous compliance; and, the new, lower emission rate results in an improvement in air quality when compared to existing allowable emissions.

For **nitrogen oxides** (NO_x), JSC proposes to retain the existing allowables of 308.7 lb/hr and 1352.1 t/yr. While this is an increase of 188.1 t/yr above the past actual emission rate, modeling indicates that it does not result in a significant impact on ambient concentrations in Duval County, or in any Class I area within 100 km. For this reason, and because this rate was determined to be BACT for this type and model boiler in the original determination, JSC requests that the existing allowables be accepted as BACT.

For **volatile organic compounds** (VOC), JSC proposes emission limits of 38.6 lb/hr and 168.9 t/yr. While this is an increase of 24.9 t/yr above the existing allowable rate, it is an increase of 39.9 t/yr above the existing actual annual emission rate. Since the increase does not exceed the significant emissions increase threshold, no further new source requirements are necessary.

For **carbon monoxide** (CO), JSC proposes emission limits of 65 lb/hr and 269.9 t/yr. The hourly emission limit remains unchanged from the past allowable rate. The annual emission rate increases by 99.9 t/yr, but this is below the 100 t/yr threshold, and, therefore, no further new source review requirements apply. No emission tests for CO have been required by DEP in the last five years; therefore, according to FAC 17-212.200(2)(b), past actuals are presumed to equal past allowables.

Attached for convenience is a tabulation of current actual and allowable emission rates. Also, as requested in your letter, we are providing the summary performance specification sheet of the boiler.

We believe this will provide the information you need to process the permit modification. If further data is required or if you have any questions, please let me know.

Very truly yours,



Hollis H. Elder
Vice President &
General Manager

Enclosure

cc: G. Cole, NE Dist
R. Robinson, Ournal Co.
G. Harper, EPA
G. Bunyat, NPS

CURRENT ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>#/hr</u> | <u>t/yr</u> | <u>Other</u> |
|------------------|-------------|-------------|--------------|
| Particulate | 44.1 | 152 | 0.1 #/MMBtu |
| SO ₂ | 289.5 | 1265 | |
| NOx | 308.7 | 1352.1 | 0.7 #/MMBtu |
| VOC | 61.0 | 144 | |
| CO | 65.0 | 170 | |

CURRENT ACTUAL EMISSIONS

| <u>Pollutant</u> | <u>#/hr</u> | <u>t/yr</u> | <u>Date determined</u> |
|------------------|-------------|-------------|------------------------|
| Particulate | 21.63 | 91.6 | 2/27/91 |
| SO ₂ | 201.11 | 852 | 3/16/92 |
| NOx | 274.89 | 1164 | 2/27/91 |
| VOC | 30.44 | 129 | 6/27/90 |

* Representative hours of operation are for 1988 and 1992.

* No test data for CO; therefore, according to FAC17-212.200(2)(b), presume actual = allowable.



JSC/CCA
 JEFFERSON SMURFIT CORPORATION AND
 CONTAINER CORPORATION OF AMERICA
 401 Alton Street, P.O. Box 276, Alton, IL 62002-2276

No.1131073

SCOTT CITY BANK & TRUST
 A CORRESPONDENT OF BOATMEN'S BANK

DATE 7-14-93

PLANT NO.
 13

The sum of 7500dol's00cts

PAY TO THE ORDER OF
 OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
 2600 BLAIR STONE ROAD
 TALLAHASSEE, FL 32399-2400

THIS CHECK NOT VALID UNLESS PRESENTED FOR
 PAYMENT WITHIN 180 DAYS FROM DATE OF ISSUE.

****7,500.00****
 AMOUNT

JEFFERSON SMURFIT CORPORATION

2ND SIGNATURE REQUIRED
 IF OVER \$5,000

[Handwritten Signature]

 2ND SIGNATURE

[Handwritten Signature]

 1ST SIGNATURE





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

AC16-23453 2
PSD-FL-207

#1500 pd
7-16-93
Receipt # 180870

| | |
|---------------------|-------|
| DER Form # | _____ |
| Form Title | _____ |
| Effective Date | _____ |
| DER Application No. | _____ |

Filed in DE#1

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Power Boiler-Combined Fuel [] New¹ [X] Existing¹
 APPLICATION TYPE: [] Construction [] Operation [X] Modification
 COMPANY NAME: Jefferson-Smurfit Corporation 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) #10 Coal/Bark Boiler
 SOURCE LOCATION: Street 1915 Wigmore Street City Jacksonville
 UTM: East 7439.500 North 3359.100
 Latitude 30° 22' 00"N Longitude 81° 37' 30"W
 APPLICANT NAME AND TITLE: Hollis H. Elder, Vice President and General Manager
 APPLICANT ADDRESS: Post Office Box 150, Jacksonville, Florida 32201

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Jefferson-Smurfit Corporation

I certify that the statements made in this application for a modification to 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: Hollis H. Elder
Hollis H. Elder, Vice President and General Manager
 Name and Title (Please Type)
 Date: 7/14/93 Telephone No. 904/353-3611

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, P.E.
Name (Please Type)

Jones, Edmunds & Associates, Inc.
Company Name (Please Type)

730 North Waldo Road, Gainesville, Florida 32601
Mailing Address (Please Type)

Florida Registration No. 36124 Date: 7/11/93 Telephone No. 904/377-5821

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 the existing Construction Permit to increase the maximum heat input to the boiler from 441 MMBtu to 540 MMBtu.

B. Schedule of project covered in this application (Construction Permit Application Only)
Start of Construction N/A 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.

Construction Permit No.: AC16-33885; issued February 3, 1981; expired January 31, 1984
Operation Permit No.: A016-185036; issued October 24, 1990; expires September 30, 1995

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____

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? Yes
b. If yes, has "Lowest Achievable Emission Rate" been applied? Yes
c. If yes, list non-attainment pollutants. Ozone, particulate*

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

3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. Yes**

4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? Yes**

5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? No

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 justifi-
cation for any answer of "No" that might be considered questionable.

* Duval County was non-attainment for TSP when the original application was submitted.
At that time LAER was established and offsets were provided.

** All applicability determinations were made in the original Construction Permit.

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

A. Raw Materials and Chemicals Used in your Process, if applicable: N/A

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

B. Process Rate, if applicable: (See Section V, Item 1) N/A

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 | |
| PM-10 | 24.3 | 106.5 | 0.1 #/10 ⁶ Btu | 24.3 | 1536.8 | 6,731 | |
| SO ₂ | 217 | 950.5 | 289.5 #/hr | 217 | 548.3 | 2,401.5 | |
| NOx | 308.7 | 1352.1 | 0.70 #/10 ⁶ Btu | 308.7 | 308.7 | 1,352.1 | |
| VOC | 38.6 | 168.9 | No std. | 38.6 | 38.6 | 168.9 | |
| CO | 65 | 269.9 | No.std. | 65 | 65 | 269.9 | |

¹See Section V, Item 2.

²Reference 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)

³Calculated from operating rate and applicable standard.

⁴Emission, 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) |
|--|-------------|------------|---|--|
| (See original Construction Permit Application) | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

E. Fuels

| Type (Be Specific) | Consumption* | | Maximum Heat Input (MMBTU/hr) |
|--------------------|--------------|---------|----------------------------------|
| | avg/hr | max./hr | |
| Coal | 30,600 | 30,600 | 397.0 |
| Bark | 35,000 | 35,000 | 143.5 |
| | | | |
| | | | |

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

Fuel Analysis: Coal/Bark

Percent Sulfur: 0.913/0.05 Percent Ash: 8.2/1.5

Density: _____ lbs/gal Typical Percent Nitrogen: 1.5/0.3

Heat Capacity: 13,005/4,100 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 -0- 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: 200 ft. Stack Diameter: 10 ft.
 Gas Flow Rate: 204,000 ACFM 167,690 DSCFM Gas Exit Temperature: 140 °F.
 Water Vapor Content: 17.8 % Velocity: 43.3 FPS

SECTION IV: INCINERATOR INFORMATION N/A

| 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 Diameter: _____ 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 N/A

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:
- 7. Energy:
- 9. Emissions:

- 6. Operating Costs:
- 8. Maintenance Cost:

| 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:

¹Explain method of determining efficiency.

²Energy 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:

¹Explain method of determining efficiency.

²Energy 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:

¹Applicant 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 N/A

1. _____ no. sites _____ TSP _____ () SO₂* _____ 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. 5 Year(s) of data from 01 / 01 / 83 to 12 / 31 / 87
month day year month day year
2. Surface data obtained from (location) Jacksonville, Station No. 13889
3. Upper air (mixing height) data obtained from (location) Waycross, Station No. 13861
4. Stability wind rose (STAR) data obtained from (location) DEP

C. Computer Models Used

1. ISCST 2 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 | <u>3.06</u> | grams/sec |
| SO ₂ | <u>27.4</u> | 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.

Particulate (PM-10)

Past Actuals =

$$\frac{8472 \times 21.63}{2000} = 91.6 \text{ tons/yr}$$

$$\text{Future allowable} = (91.6 + 14.9) \times \frac{2000}{8760} = 24.3 \text{ lb/hr}$$

Potential emissions (AP-42) =

$$\left[\frac{17 \text{ lb}}{\text{ton}} \times \frac{17.5 \text{ tons}}{\text{hr}} \right] + \left[\frac{10 \times 8.1 \text{ lb}}{\text{ton}} \times \frac{15.3 \text{ tons}}{\text{hr}} \right] = \frac{1536.8 \text{ lb}}{\text{hr.}}$$

$$= \frac{6731 \text{ tons}}{\text{yr}}$$

SO₂

Future allowables determined by computer modelling.

Potential emissions =

$$\left[\frac{39 (0.913) \text{ lb}}{\text{ton}} \times \frac{15.3 \text{ tons}}{\text{hr}} \right] + \left[\frac{0.2 \text{ lb}}{\text{ton}} \times \frac{17.5 \text{ tons}}{\text{hr}} \right] = \frac{548.3 \text{ lb}}{\text{hr}}$$

$$= \frac{2,401.5 \text{ tons}}{\text{yr}}$$

NOx

Retain existing allowables

VOC

$$\text{Past Actuals} = \frac{8472}{2000} \times \frac{30.44 \text{ lb}}{\text{hr}} = \frac{129 \text{ tons}}{\text{yr}}$$

$$\text{Future Allowable} = \left[129 + \frac{39.9 \text{ tons}}{\text{yr}} \right] \times \frac{2000}{8760} = \frac{38.6 \text{ lb}}{\text{hr}}$$

Potential Emissions = Future allowables, based on stack test.

CO

No stack test has been required by DEP, ∴ past actuals equal past allowables, according to FAC 17-212.200(2)(b).

Future allowables =

$$\frac{170 \text{ t}}{\text{y}} + \frac{99.9 \text{ t}}{\text{y}} = 269.9 \frac{\text{t}}{\text{y}}$$

$$\left[\frac{15.3 \text{ t}}{\text{hr}} \times \frac{0.6 \text{ lb}}{\text{t}} \right] + \left[\frac{17.5 \text{ t}}{\text{hr}} \times \frac{3.19 \text{ lb}}{\text{t}} \right] = \frac{65 \text{ lb}}{\text{hr}}$$

**SOURCE TEST REPORT
for
PARTICULATE, OXIDES OF NITROGEN,
SULFUR DIOXIDE, AND VISIBLE EMISSIONS**

NUMBER 10 COMBINATION

**FDER PERMIT NUMBER AO16-185036
FDER I.D. NUMBER 31-16-0003-13**

MARCH 6, 1992

Prepared for:

**JEFFERSON-SMURFIT CORPORATION
1915 WIGMORE STREET
POST OFFICE BOX 150
JACKSONVILLE, FLORIDA 32201**

Prepared by:

**AIR CONSULTING AND ENGINEERING, INC.
2106 N.W. 67TH PLACE, SUITE 4
GAINESVILLE, FLORIDA 32606
(904) 335-1889**

199-92-01

RECEIVED

APR 16 1992

TECHNICAL DEPT.

2.0 SUMMARY AND DISCUSSION OF RESULTS

The Number 10 Combination Boiler was found to be operating within the emission compliance limits for particulate, NO_x , SO_2 , and visible emissions. Results are summarized in Table 1.

Particulate emissions averaged 10.09 pounds per hour (lbs/Hr) and 0.0214 pounds per million BTUs (lbs/MMBTU) of heat input to the boiler. This is well within the compliance limits of 44.0 lbs/Hr and 0.1 lbs/MMBTU.

Oxides of nitrogen emissions averaged 264.25 lbs/Hr and 0.5592 lbs/MMBTU, also well within the compliance limits of 308.7 lbs/Hr and 0.7 lbs/MMBTU.

Sulfur dioxide emissions averaged 201.11 lbs/Hr and 0.4256 lbs/MMBTU compared to compliance limits of 289.5 lbs/Hr and 1.2 lbs/MMBTU.

Visible emissions averaged 0.0 percent opacity for the highest six minute period of the test. Compliance is 20 percent opacity for the highest six minute period.

Computer printouts are presented in Appendix A. Field data sheets and strip charts are in Appendix B. Laboratory data are provided in Appendix C and visible emission data are located in Appendix F.

Table 1 Emission Summary
 Number 10 Combination Boiler
 Jefferson-Saurfit Corporation
 Jacksonville, Florida
 March 6, 1992

| Run Number | Time | Volumetric Flow SCFMD | O ₂ % | H ₂ O % | Stack Temperature °F | Emissions | | | | | | | |
|------------|-----------|--------------------------|---------------------|-----------------------|----------------------------|-------------|----------|-----------------|--------|-----------------|---------|--------|----------|
| | | | | | | Particulate | | NO _x | | SO ₂ | | | |
| | | | | | | lb/Hr | lb/MMBTU | ppm Dry | lb/Hr | lb/MMBTU | ppm Dry | lb/Hr | lb/MMBTU |
| 1 | 1132-1235 | 148115 | 7.6 | 21.2 | 143 | 10.48 | 0.0222 | 298.7 | 316.87 | 0.6706 | 164.5 | 242.79 | 0.5138 |
| 2 | 1323-1426 | 141174 | 7.9 | 21.6 | 144 | 10.04 | 0.0212 | 241.6 | 244.29 | 0.5170 | 136.3 | 191.68 | 0.4057 |
| 3 | 1456-1600 | 138539 | 8.1 | 21.2 | 143 | 9.76 | 0.0207 | 233.4 | 231.59 | 0.4901 | 122.3 | 168.87 | 0.3574 |
| Average | ----- | 142609 | 7.9 | 21.3 | 143 | 10.09 | 0.0214 | 257.9 | 264.25 | 0.5592 | 141.0 | 201.11 | 0.4256 |

Emission Calculations:

lb/MMBTU = lb/Hr ÷ 472.5 MMBTU/Hr

SO₂ - NO₂ lb/Hr = (2.595 × 10⁻⁹) (MW) (ppm) (SCFMD) (60)

MW (NO_x) = 46
 MW (SO₂) = 64

3.0 PROCESS DESCRIPTION AND OPERATION

The Number 10 Boiler at Jefferson-Smurfit produces steam for the paper making equipment. The average heat input to the boiler was provided by Mr. Tonn as follows:

Heat Input from Coal = 286.8 MMBTUH

Heat Input from Bark = 185.7 MMBTUH

Total heat input = 472.5 MMBTUH

This is within $\pm 10\%$ of the permitted maximum heat input of 441 MMBTUH.

Fuel rate calculations are provided in Appendix F.

HEAT INPUT CALCULATIONS FOR
NO. 10 COAL/BARK BOILER, AO16-185036
JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL

HEAT INPUT CALCULATIONS FOR COMPLIANCE TESTS ON 3-6-92

FUEL VALUE OF COAL

$$\frac{13005 \text{ BTU/\#COAL} \times 1-.0542 \frac{\text{\#moist.}}{\#} \times 2000 \text{ \#/TON}}{1,000,000 \text{ BTU/MMBTU}} = 24.6 \text{ MMBTU/TON}$$

$$\text{TOTAL CO}_2 = 142,609 \text{ SDCF/MIN.} \times 60 \text{ MIN/HR} \times .102 \text{ CO}_2 = 872767 \text{ ft}^3\text{CO}_2$$

$$\text{CO}_2 \text{ FROM COAL} = 11.66 \text{ TONS COAL/HR} \times 24.6 \text{ MMBTU/TON} \times 1800 \text{ ft}^3\text{CO}_2/\text{MMBTU} = 516305 \text{ ft}^3\text{CO}_2/\text{h}$$

$$\text{CO}_2 \text{ FROM BARK} = 356462 \text{ ft}^3\text{CO}_2$$

$$\text{MMBTU/HR FROM BARK} = \frac{356462 \text{ ft}^3\text{CO}_2/\text{hr}}{1920 \text{ ft}^3\text{CO}_2/\text{MMBTU BARK}} = 185.7 \text{ MMBTU/HR}$$

$$\text{MMBTU/HR FROM COAL} = 11.66 \text{ TON COAL/HR} \times 24.6 \text{ MMBTU/TON} = 286.8 \text{ MMBTU/HR}$$

$$\text{TOTAL MMBTUs/hr. INTO FURNACE} = 472.5 \text{ MMBTU/HR}$$

% OF PERMITTED HEAT INPUT:

$$\frac{472.5 \text{ MMBTU/hr} \times 100}{441 \text{ MMBTU/HR}} = 107.1\%$$

E.T. Tonn

E.T. TONN
 SENIOR ENVIRONMENTAL ENGINEER
 td:\envtests\heatinpt.env

SOURCE TEST REPORT
for
PARTICULATE. OXIDES OF NITROGEN.
SULFUR DIOXIDE AND VISIBLE EMISSIONS

JEFFERSON-SMURFIT CORPORATION
JACKSONVILLE. FLORIDA

NUMBER 10 COMBINATION BOILER

FDER PERMIT NUMBER A016-185036
FDER I.D. NUMBER 31-16-0003-13

FEBRUARY 27. 1991

Prepared for:

JEFFERSON-SMURFIT CORPORATION
1915 WIGMORE STREET
JACKSONVILLE. FLORIDA 32201

Prepared by:

AIR CONSULTING AND ENGINEERING. INC.
2106 N.W. 67th PLACE. SUITE 4
GAINESVILLE. FLORIDA 32606
(904) 335-1889

199-91-02

2.0 SUMMARY AND DISCUSSION OF RESULTS

The Number 10 Combination Boiler was found to be operating within the emission compliance limits for particulate, NO_x , SO_2 , and visible emissions. Results are summarized in Table 1.

Particulate emissions averaged 21.63 pounds per hour (lb/Hr) and 0.0504 pounds per million BTUs (lb/MMBTU) of heat input to the boiler. This is well within the compliance limits of 44.0 lb/Hr and 0.1 lb/MMBTU.

Oxides of nitrogen emissions averaged 274.89 lb/Hr and 0.6425 lb/MMBTU, also well within the compliance limits of 308.7 lb/Hr and 0.7 lb/MMBTU.

Sulfur dioxide emissions averaged 314.15 lb/Hr and 0.7319 lb/MMBTU compared to compliance limits of 289.5 lb/Hr and 1.2 lb/MMBTU.

The SO_2 results are not totally accurate because of matrix interferences. It was impossible to get a clear end point while titrating. Therefore, the SO_2 laboratory results are bias higher than the SO_2 results obtained with the continuous emission monitor.

Visible emissions averaged 3.75 percent opacity for the highest six minute period of the test. Compliance is 20 percent opacity for the highest six minute period.

Table 1 Emission Summary
 Number 10 Combination Boiler
 Jefferson-Smurfit Corporation
 Jacksonville, Florida
 February 27, 1991

| Run Number | Time | Volumetric Flow SCFMD | O ₂ % | H ₂ O % | Stack Temperature °F | Emissions | | | | | | | |
|------------|-----------|--------------------------|---------------------|-----------------------|----------------------------|-------------|----------|---------|-----------------|--------|-----------------|---------|--------|
| | | | | | | Particulate | | ppm Dry | NO _x | | SO ₂ | | |
| | | | | | | lb/Hr | lb/MMBTU | | | lb/Hr | lb/MMBTU | ppm Dry | lb/Hr |
| 1 | 0824-0935 | 166534 | 10.4 | 18.1 | 138 | 29.89 | 0.0696 | 232 | 276.72 | 0.6446 | 192.4 | 319.29 | 0.7438 |
| 2 | 1018-1120 | 166518 | 10.1 | 17.8 | 138 | 17.42 | 0.0406 | 232 | 276.69 | 0.6446 | 183.4 | 304.24 | 0.7088 |
| 3 | 1158-1300 | 170018 | 10.6 | 17.6 | 137 | 17.57 | 0.0409 | 225 | 273.98 | 0.6383 | 188.3 | 318.94 | 0.7430 |
| Average | ----- | 167690 | 10.4 | 17.8 | 138 | 21.63 | 0.0504 | 230 | 274.89 | 0.6425 | 188.0 | 314.15 | 0.7319 |

Emission Calculations:

lb/MMBTU = lb/Hr ÷ 429.26 MMBTU/Hr

SO₂ - NO₂ lb/Hr = (2.595 x 10⁻⁹) (MW) (ppm) (SCFMD) (60)

MW (NO_x) = 46

MW (SO₂) = 64

The average heat input to the boiler was provided by Mr. Tonn as follows:

Heat Input from Coal = 340.52 MMBTUH

Heat Input from Bark = 88.74 MMBTUH

Total heat input = 429.26 MMBTUH

This is within $\pm 10\%$ of the permitted maximum heat input of 441 MMBTUH.

Fuel rate calculations are provided in Appendix F. Particulate emission data, NO_x and SO_2 emission summary and strip chart copies, field data sheets, and laboratory data sheets are provided in Appendices A, B, C, and D, respectively. Visible emission data and observers' certification are presented in Appendix F.

HEAT INPUT CALCULATIONS FOR
NO. 10 COAL/BARK BOILER, AO16-86317
JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL
FEBRUARY 27, 1991

FUEL VALUE OF COAL

$$\frac{13,775 \text{ BTU/\#COAL} \times 1 - 0.0551 \frac{\text{H}_2\text{O}}{\text{COAL}} \times 2000 \text{ \#/TON}}{1,000,000 \text{ BTU/MMBTU}} = 27.55 \text{ MMBTU/TON}$$

HEAT INPUT FROM COAL

$$12.36 \text{ TONS COAL/HR} \times 27.55 \text{ MMBTU/TON} = 340.52 \text{ MMBTU/HR.}$$

HEAT INPUT FROM BARK:

$$314,992 \text{ \#STEAM/HR} \times 0.001102 \text{ MMBTU/\#STEAM} - 340.52 \frac{\text{MMBTU COAL}}{\text{HR}} \times 0.85 \text{ EFF.}$$

0.65 EFF. ON BARK

$$= 88.74 \text{ mmbTU/HR.}$$

TOTAL HEAT INPUT:

340.52 MMBTU/HR FROM COAL
88.74 MMBTU/HR FROM BARK
429.26 MMBTU/HR TOTAL

% OF PERMITTED LOAD:

$$\frac{429.26 \text{ MMBTU/HR} \times 100}{441 \text{ MMBTU/HR}} = 97.3\%$$

E. T. Tonn

E. T. TONN
SENIOR ENVIRONMENTAL ENGINEER

**SOURCE TEST REPORT
for
PARTICULATE, OXIDES OF NITROGEN,
SULFUR DIOXIDE, AND VISIBLE EMISSIONS**

NUMBER 10 COMBINATION

**FDER PERMIT NUMBER AO16-185036
FDER I.D. NUMBER 31-16-0003-13**

MARCH 6, 1992

Prepared for:

**JEFFERSON-SMURFIT CORPORATION
1915 WIGMORE STREET
POST OFFICE BOX 150
JACKSONVILLE, FLORIDA 32201**

Prepared by:

**AIR CONSULTING AND ENGINEERING, INC.
2106 N.W. 67TH PLACE, SUITE 4
GAINESVILLE, FLORIDA 32606
(904) 335-1889**

199-92-01

RECEIVED

MAR 16 1992

TECHNICAL DEPT.

2.0 SUMMARY AND DISCUSSION OF RESULTS

The Number 10 Combination Boiler was found to be operating within the emission compliance limits for particulate, NO_x, SO₂, and visible emissions. Results are summarized in Table 1.

Particulate emissions averaged 10.09 pounds per hour (lbs/Hr) and 0.0214 pounds per million BTUs (lbs/MMBTU) of heat input to the boiler. This is well within the compliance limits of 44.0 lbs/Hr and 0.1 lbs/MMBTU.

Oxides of nitrogen emissions averaged 264.25 lbs/Hr and 0.5592 lbs/MMBTU, also well within the compliance limits of 308.7 lbs/Hr and 0.7 lbs/MMBTU.

Sulfur dioxide emissions averaged 201.11 lbs/Hr and 0.4256 lbs/MMBTU compared to compliance limits of 289.5 lbs/Hr and 1.2 lbs/MMBTU.

Visible emissions averaged 0.0 percent opacity for the highest six minute period of the test. Compliance is 20 percent opacity for the highest six minute period.

Computer printouts are presented in Appendix A. Field data sheets and strip charts are in Appendix B. Laboratory data are provided in Appendix C and visible emission data are located in Appendix F.

Table 1 Emission Summary
 Number 10 Combination Boiler
 Jefferson-Saurfit Corporation
 Jacksonville, Florida
 March 6, 1992

| Run Number | Time | Volumetric Flow SCFMD | O ₂ % | H ₂ O % | Stack Temperature °F | Particulate | | Emissions | | | SO ₂ | | |
|------------|-----------|--------------------------|---------------------|-----------------------|----------------------------|-------------|---------------------|-----------|---------------------|---------------------|-----------------|--------|----------|
| | | | | | | lb/Hr | lb/MMBTU | ppm Dry | lb/Hr | lb/MMBTU | ppm Dry | lb/Hr | lb/MMBTU |
| 1 | 1132-1235 | 148115 | 7.6 | 21.2 | 143 | 10.48 | 0.0222 ✓ | 298.7 | 316.87 ✓ | 0.6706 ✓ | 164.5 | 242.79 | 0.5138 |
| 2 | 1323-1426 | 141174 | 7.9 | 21.6 | 144 | 10.04 | 0.0212 ³ | 241.6 | 244.29 ✓ | 0.5170 ✓ | 136.3 | 191.68 | 0.4057 |
| 3 | 1456-1600 | 138539 | 8.1 | 21.2 | 143 | 9.76 | 0.0207 ✓ | 233.4 | 231.59 ✓ | 0.4901 ✓ | 122.3 | 168.87 | 0.3574 |
| Average | ----- | 142609 | 7.9 | 21.3 | 143 | 10.09 | 0.0214 ✓ | 257.9 | 264.25 ✓ | 0.5592 ✓ | 141.0 | 201.11 | 0.4256 |

Emission Calculations:

lb/MMBTU = lb/Hr ÷ 472.5 MMBTU/Hr

SO₂ - NO₂ lb/Hr = (2.595 × 10⁻⁹) (MW) (ppm) (SCFMD) (60)

MW (NO_x) = 46
 MW (SO₂) = 64

$\frac{\#}{\text{hr}} = .00001 (\text{ppm}) (\text{SCFMD})$

a MMATOC / hr

3.0 PROCESS DESCRIPTION AND OPERATION

The Number 10 Boiler at Jefferson-Smurfit produces steam for the paper making equipment. The average heat input to the boiler was provided by Mr. Tonn as follows:

| | |
|-------------------------------------|----------|
| Heat Input from Coal = 286.8 MMBTUH | 61% COAL |
| Heat Input from Bark = 185.7 MMBTUH | 39% BARK |
| Total heat input = 472.5 MMBTUH | |

This is within $\pm 10\%$ of the permitted maximum heat input of 441 MMBTUH.

Fuel rate calculations are provided in Appendix F.

201.11 #
h.

Capacity Factor = $\frac{286.8 \text{ MMBTUH/h} \times 8472}{286.8 \times 2670}$

Handwritten calculation steps:

$$\begin{array}{r} \textcircled{.9} \\ 286.8 \text{ MMBTUH/h} \times 8472 \\ \hline 286.8 \quad | \quad 2670 \\ \textcircled{.6} \\ \hline 441 \\ \textcircled{.5} \\ \hline 540 \end{array}$$

HEAT INPUT CALCULATIONS FOR

NO. 10 COAL/BARK BOILER, AO16-185036

JEFFERSON SMURFIT CORPORATION

JACKSONVILLE MILL

HEAT INPUT CALCULATIONS FOR COMPLIANCE TESTS ON 3-6-92

FUEL VALUE OF COAL

$$\frac{13005 \text{ BTU/\#COAL} \times 1-.0542 \frac{\text{moist.}}{\#} \times 2000 \text{ \#/TON}}{1,000,000 \text{ BTU/MMBTU}} = 24.6 \text{ MMBTU/TON}$$

$$\text{TOTAL CO}_2 = 142,609 \text{ SDCF/MIN.} \times 60 \text{ MIN/HR} \times .102 \text{ CO}_2 = 872767 \text{ ft}^3\text{CO}_2$$

$$\text{CO}_2 \text{ FROM COAL} = 11.66 \text{ TONS COAL/HR} \times 24.6 \text{ MMBTU/TON} \times 1800 \text{ ft}^3\text{CO}_2/\text{MMBTU} = - 516305 \text{ ft}^3\text{CO}_2/\text{hr}$$

$$\text{CO}_2 \text{ FROM BARK} = 356462 \text{ ft}^3\text{CO}_2$$

$$\text{MMBTU/HR FROM BARK} = \frac{356462 \text{ ft}^3\text{CO}_2/\text{hr}}{1920 \text{ ft}^3\text{CO}_2/\text{MMBTU BARK}} = 185.7 \text{ MMBTU/hr}$$

$$\text{MMBTU/HR FROM COAL} = 11.66 \text{ TON COAL/HR} \times 24.6 \text{ MMBTU/TON} = 286.8 \text{ MMBTU/hr}$$

$$\text{TOTAL MMBTUs/hr. INTO FURNACE} = 472.5 \text{ MMBTU/hr}$$

% OF PERMITTED HEAT INPUT:

$$\frac{472.5 \text{ MMBTU/hr} \times 100}{441 \text{ MMBTU/HR}} = 107.1\%$$



E.T. TONN
SENIOR ENVIRONMENTAL ENGINEER
td:\envtests\heatinpt.scv

SOURCE TEST REPORT
for
VOLATILE ORGANIC COMPOUND EMISSIONS

NUMBER 10 COMBINATION BOILER

FDER PERMIT NUMBER
AO 16-86317

JUNE 27, 1990

Prepared for:

JEFFERSON-SMURFIT CORPORATION
1915 WIGMORE STREET
POST OFFICE BOX 150
JACKSONVILLE, FLORIDA 32201

Prepared by:

AIR CONSULTING AND ENGINEERING, INC.
2106 N.W. 67th PLACE, SUITE 4
GAINESVILLE, FLORIDA 32606
(904) 335-1889

199-90-05

2.0 SUMMARY AND DISCUSSION OF RESULTS

Results of the emission testing are summarized in Table 1. Complete emission data are provided in the appendices.

Total VOC emissions as carbon averaged 30.44 pounds per hour for the three run test period.

The boiler was fired on a combination of coal and bark at a rate of 432.1 million BTU per hour or 98% of permitted capacity. These calculations are presented in Appendix D.

Table 1 Volatile Organic Compound Emissions Summary
 Number 10 Combination Boiler
 Jefferson-Smurfit Corporation
 June 27, 1990

| Run Number | Time | C ₆ H ₆ ppm _{wet} | Stack Moisture % | C ₆ H ₆ ppm _{dry} * | Volumetric Flow (SCFMD) | VOC lb/Hr** as Carbon |
|------------|-----------|--|------------------|--|-------------------------|-----------------------|
| 1 | 0935-1035 | 34 | 20.5 | 43 | 126233 | 30.42 |
| 2 | 1057-1157 | 31 | 21.0 | 39 | 126784 | 27.72 |
| 3 | 1214-1314 | 36 | 21.6 | 46 | 128697 | 33.18 |
| Average | ----- | 34 | 21.0 | 43 | 127238 | 30.44 |

* $\text{ppm}_d = \text{ppm}_w / \text{FDA}$
 Where FDA = Fraction Dry Air

** $\text{ppm C}_6\text{H}_6\text{dry} \times \text{X} = \text{ppm C}$
 $\text{lb/Hr} = (\text{ppm C})(3.114 \times 10^{-6})(\text{SCFMD})(60)$

HEAT INPUT CALCULATIONS FOR
 #10 UTILITY BOILER, A016-86317
 FOR V.O.C.
 RUN ON JUNE 27, 1990
 JEFFERSON SMURFIT CORPORATION
 JACKSONVILLE, FLORIDA

Fuel value of coal on 6/27/90:

$$13259 \text{ BTU/\#coal} \times 1 - .0566 \frac{\text{\# moist.}}{\text{\#}} \times 2000 \text{ \#/ton} = 25.0 \text{ MMBtu/hr.}$$

$$1,000,000 \text{ BTU/MMBTU}$$

Heat input from coal:

$$12.16 \text{ tons coal/hr.} \times 25.0 \text{ MMBtu/ton coal} = 304.0 \text{ MMBtu/hr.}$$

Heat input from bark:

$$310,060 \text{ \#steam/hr.} \times .001102 \text{ Btu/\#stm.} - 304.0 \frac{\text{MMBTu Coal}}{\text{hr.}} \times .85 \text{ eff.on coal}$$

$$.65 \text{ eff. on bark}$$

$$= 128.1 \text{ MMBtu/hr.}$$

Total heat input: 432.1 MMBtu/hr.

% of Permitted load:

$$\frac{432.1 \text{ MMBtu/hr.}}{441 \text{ MMBtu/hr.}} \times 100 = 98.0\%$$

JND
 J. Norman Davis
 Environmental Engineer
 Quality Management Facilitator

**ALTON PACKAGING CORPORATION
JACKSONVILLE, FLORIDA
1 TYPE VU-40 BOILER
C-E CONTRACT 25781**

PREDICTED PERFORMANCE*

| Fuel | | NO. 6 OIL | PULV. COAL |
|------------------------------------|-------|-----------|------------|
| Evaporation | lb/hr | 350,000 | 350,000 |
| Feedwater Temperature | °F | 360 | 360 |
| Superheater Outlet Temperature | °F | 850 | 850 |
| Superheater Outlet Pressure | psig | 900 | 900 |
| Boiler Outlet Pressure | psig | 958 | 958 |
| Superheater Pressure Drop | psi | 58 | 58 |
| Economizer Pressure Drop | psi | 27 | 27 |
| Efficiency | % | 87.20 | 87.43 |
| Fuel Fired | lb/hr | 23,580 | 35,380 |
| Excess Air Leaving Boiler | % | 15 | 20 |
| Gas Leaving Boiler | lb/hr | 401,300 | 425,100 |
| Gas Temp. Leaving Boiler | °F | 870 | 900 |
| Gas Temp. Leaving Economizer | °F | 615 | 630 |
| Gas Temp. Leaving Air Heater | °F | 340 | 360 |
| Ambient Air Temperature | °F | 80 | 80 |
| Relative Humidity | % | 60 | 60 |
| Air to Air Heater | °F | 80 | 80 |
| Air Temperature Leaving Air Heater | °F | 410 | 450 |
| Air Leaving Air Heater | lb/hr | 377,800 | 394,700 |
| Pressure Drop** | | | |
| Windbox | "wg | 4.00 | 3.10 |
| Air Heater, Air Side | "wg | 2.57 | 2.25 |
| Air Ducts | "wg | 0.57 | 0.50 |
| Steam Air Heater | "wg | 0.63 | 0.63 |
| Total | "wg | 7.77 | 6.48 |
| Draft Loss** | | | |
| Furnace | "wg | 0.10 | 0.10 |
| Boiler & Superheater | "wg | 0.32 | 0.37 |
| Economizer | "wg | 1.02 | 1.17 |
| Air Heater, Gas Side | "wg | 1.95 | 2.19 |
| Gas Ducts | "wg | 0.57 | 0.50 |
| Dust Collector (Mech. & Scrubber) | "wg | 23.70 | 23.80 |
| Total | "wg | 27.66 | 28.13 |

*NOTES: * These performance figures are predicted only and are not to be construed as being guaranteed except where the points coincide with the guarantees.
 ** Pressure & Draft Losses are at 30 ft elev.
 The fuel specifications on which the performance is based are as follows.
 The source of analysis is derived from customer's dry analysis.

| No. 6 Oil - % by wgt. | |
|-----------------------|--------|
| C | 85.75 |
| H ₂ | 11.00 |
| O ₂ | 0.40 |
| N ₂ | 0.35 |
| S | 2.50 |
| | 100.00 |

HHV = 18,690 Btu/lb

| Coal - % By Weight | |
|--------------------|--------|
| Fixed Carbon | 67.80 |
| H ₂ | 4.80 |
| O ₂ | 7.50 |
| N ₂ | 1.60 |
| H ₂ O | 3.00 |
| ASH | 13.40 |
| S | 1.90 |
| | 100.00 |

HHV = 12,590 Btu/lb

BOILER VALVE & TRIM LIST
FOR

Date 9-12-81

ALTON PACKAGING CORPORATION

Ultimate User ALTON PACKAGING CORP. Consul. Engr. REYNOLDS, SMITH & HILLS

Plant Location JACKSONVILLE, FLORIDA Purchaser P.O. No. 13-J-9601

Plant Elevation 10'-6" C-E, Inc. Contract No. 25781

Installation OUTDOOR

Boiler Type VU-40

Units on Contract ONE Furn. Width 21'-11" Furn. Depth 23'-11"

Drum Centers 16'-0" Upper Drum Dia. 60" Blr. Tube Dia. 2"

Heating Surface - Ft²: Boiler 11,065 Water Wall 8,355 Economizer 6,970

Furnace Volume - Cu. Ft. 31,590

Pressure - psig: Design 1025 Operating 900 Future Operating -

Capacity - lb/hr.: 350,000 Peak 385,000 Future -

Air Temperature - °F: 80° T.S.T. 850° Future T.S.T. -

Feedwater Temperature - °F: _____ Economizer Inlet 360°

Fuel(s): Primary PULV. COAL H.V. 12,590 BTU/LB. Sec. N° 6 OIL H.V. 18,690 BTU/L
 Sec. WOODWASTE H.V. 4,220 BTU/LB.

*RAF/TB 9/17/81
N.A. 9/17/81*

~~Presrow - INFO~~
Return to files
Path? JRS
7-13-93

Jim,

In regards to the February 27, 1991 Source Test Report for Jefferson Smurfit showing a higher than permitted sulfur dioxide emissions level (314.15 lb/hr vs. permitted level of 289.5 lb/hr), Dana Brown has relayed to us the following:

The higher than allowed level was a result of a lab problem involving proper titration to get the reading. Their office was aware of this problem and allowed them to retest.

In addition to the above, Jefferson- Smurfit is presently putting together a new compliance plan and is developing a new monitoring system. Their office will continue to monitor the facility for compliance.

John Brown
F.Y.I.
Jim P.
7/13

File Copy



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 22, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Hollis H. Elder
General Manager
Jefferson Smurfit Corporation
Containerboard Mill Division
1915 Wigmore Street
Jacksonville, Florida 32201

Dear Mr. Elder:

Re: Request for Modification of a Specific Condition to the
Operation Permit No. AO 16-185036: No. 10 Coal/Bark Boiler

The Department has reviewed your letter received December 21, 1992, which requested an increase in the heat input from 441 MMBtu/hr to 540 MMBtu/hr. Based on a review of the files of the No. 10 Coal/Bark Boiler's construction permit, No. AC 16-33885, the following information is relevant to the proposal/request:

- o On February 3, 1991, construction permit No. AC 16-33885 was issued for the construction of the new No. 10 Coal/Bark Boiler; and,
- o Specific Condition No. 10 states that the maximum heat input to the boiler is limited to 441 x MMBtu/hr and was taken from the application package as a worst case firing scenario, which is 100% coal with no bark.

Due to the federally enforceable condition established in the construction permit for the maximum heat input of 441 MMBtu/hr, the condition cannot be changed through an operation permit amendment/modification in accordance with F.A.C. Rules 17-212.400(6)(b) and 17-212.500(8)(d)2., but will require a construction permit for a modification, which includes an evaluation of the pollutant emissions for reasonable assurance purposes and public notice of the Department's Intent. Therefore, in order to process your proposal, the following questions and information, including all assumptions, calculations and reference materials, is deemed necessary:

- o Please submit to the Department's Bureau of Air Regulation an application package for a modification along with the appropriate

Mr. Hollis H. Elder
Proposed Modification to AO 16-185036
January 22, 1993
Page 2

processing fee. The processing fee is to be based on the **net change** from the previous actual pollutant emissions to the proposed future allowables/potential pollutant emissions, in tons per year, and on the worst case pollutant. The previous actual emissions shall be as defined by F.A.C. Rule 17-296.200, which directs the calculation to be based on the average hours of the last two years of operation, but within the last five years if it can be shown that other years are more representative, times the actual pollutant emission rate (i.e., lbs/hr) and divided by the 2,000 lbs/ton. The future allowable/potential pollutant emissions shall be calculated by multiplying the proposed allowable pollutant emission rate (i.e., lbs/hr) times the desired annual hours of operation and divided by the 2,000 lbs/ton.

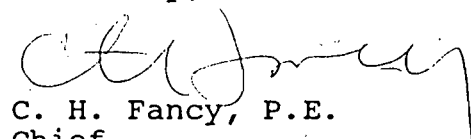
o Has the No. 10 Coal/Bark Boiler been physically modified or reconstructed since the original construction was completed and in accordance with the construction permit No. AC 16-33885? If so, please explain fully and provide details.

o Will the proposed modification (i.e., increase in Btu heat input to the No. 10 Coal/Bark Boiler) affect any source's operation or be associated with any source modification at the mill? If so, please explain fully and provide details. If there is any other modification occurring, then please submit the appropriate application package and processing fee.

o Please provide the summary performance specification sheet of the boiler as contracted with the manufacturer of the boiler.

Once the above information and responses have been received, the Department will resume processing the proposal. If there are any questions, please call Mr. Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,



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

CFH/BM/rbm

Attachment

cc: A. Kutyna, NED
J. Braswell, Esq., DER

R. Roberson, DCAQD
G. Tonn, JSC

Ready File

Clair Fancy
John Brown
Preston Lewis
Bum

1-22-93 RBM

Best Available Copy

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.
- "Return Receipt Requested" on the mailpiece below the article number. Receipt Fee will provide you the signature of the person delivered.

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

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

| | |
|---|--|
| er ger Jefferson Smurfit Corp. Containerboard Mill Division 1915 Wigmore Street Jacksonville, FL 32201 | 4a. Article Number P 062 922 024 |
| 5. Signature (Addressee) | 4b. Service Type <input checked="" type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise |
| 6. Signature (Agent) <i>Vince W...</i> | 7. Date of Delivery 1-26-93 |
| 8. Addressee's Address (Only if requested and fee is paid) | |

PS Form 3811, November 1990 ☆ U.S. GPO: 1991-287-066 **DOMESTIC RETURN RECEIPT**

P 062 922 024



Receipt for Certified Mail

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

| | |
|---|----|
| Sent to Mr. Hollis Elder, Jefferson | |
| Street and No. Smurfit Corp. 1915 Wigmore Street | |
| P.O., State and ZIP Code Jacksonville, FL 32201 | |
| 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: 1-22-92 Permit: A016-185236 | |

PS Form 3800, June 1991



JEFFERSON SMURFIT CORPORATION

December 18, 1992

Containerboard Mill Division

1915 WIGMORE STREET

PO BOX 150

JACKSONVILLE, FL 32201

TELEPHONE: 904/353-3611

RECEIVED

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

DEC 21 1992

Division of Air
Resources Management

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Division of Air Resources Management
2600 Blairstone Road
Tallahassee, Florida 32399-2400

SUBJECT: NO. 10 COAL/BARK BOILER
PERMIT NUMBER AO16-185036
JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL

Dear Mr. Fancy:

The purpose of this letter is to request a modification to the subject operation permit.

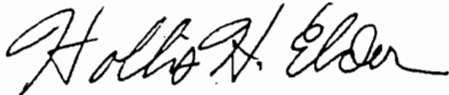
Specific Condition 12 of the operation permit provides that the maximum heat input shall be limited to 441×10^6 BTUs per hour of bark and coal. The heat input was a calculated number based on the combustion of 100% coal. In our operating experience, bark has become an important fuel, from an economical consideration as well as an environmentally sound use of a waste material. The combustion of bark is, however, less efficient than coal due to the moisture content and other factors and to yield sufficient BTUs to generate the required steam for the process, requires increased BTU input. In order to accommodate the increase in bark usage, we are requesting that Specific Condition 12 be modified to provide a maximum heat input of 540×10^6 BTU/hour.

Unfortunately, we believe we have exceeded the permitted fuel input rate, although we have demonstrated through the Continuous Emission Monitor System (CEMS) for SO_2 and NO_x that we comply with the emission limiting standards at a higher fuel input rate. We also have a stack test for particulate matter, SO_2 and NO_x which demonstrates we are well below the permitted emission limitation at a higher fuel input rate. We will coordinate with the Department in scheduling a stack test at the requested fuel input rate to demonstrate compliance with the current emission limitations. We are insuring that we do not currently exceed the specified firing rate until the permit is modified. This will not affect the rate of operation of the rest of the Mill since outside electric energy will be purchased for the difference until the permit is modified.

No. 10 Coal/Bark Boiler
Permit #AO16-185036
Jefferson Smurfit Corp.
PAGE 2

Accordingly, we would appreciate your expediting amending the permit to include the higher input rate and allow the facility to generate the energy that it requires by burning a higher proportion of bark. We are not asking for any change in the current emission limitations. If you have any questions regarding this, or need additional information, please let me know.

Very truly yours,



Hollis H. Elder
General Manager

CR# P 041 812 188

cc: Ernie Frey, P.E., DER
Andy Kutyna, P.E., DER
Ron Roberson, RESD

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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Nellis Elder, VP + GM
 Jefferson Smurfitt Corp
 PO Box 150
 Jacksonville, FL 32201

4a. Article Number
 Z 392 979 052

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

7. Date of Delivery
 7-17-95

5. Signature (Addressee)

6. Signature (Agent)
 [Signature]

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

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 ☆U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

Z 392 979 052



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

PS Form 3800, March 1993

| | |
|---|----------------------------|
| Sent to | Nellis Elder |
| Street and No. | Jefferson Smurfitt Corp |
| P.O., State and ZIP Code | PO Box 150 Jacksonville FL |
| 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 | AC 16-234532 / 7-11-95 |

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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Hollis H. Elder, VP
 Jefferson Smurfit Corp
 P O Box 150
 Jacksonville, FL 32201

4a. Article Number
 2392 979 005

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

7. Date of Delivery
 JUN 22 1995

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

5. Signature (Addressee)
 [Signature]

6. Signature (Agent)
 [Signature]

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 *U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

2 392 979 005



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

PS Form 3800, March 1993

| | |
|---|--------------------------|
| Sent to | Hollis Elder |
| Street and No. | Jefferson Smurfit Corp |
| P.O. Station and ZIP Code | Box 150 Jacksonville, FL |
| 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 | 6-22-95 |
| | AC 16-234532(A) |

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:
 Hollis H. Elder, VP
 Jefferson Smurfitt Corp.
 P.O. Box 150
 Jacksonville, FL
 32201

4a. Article Number
 Z 392 979 045

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

7. Date of Delivery
 6-22-95

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

5. Signature (Addressee)

6. Signature (Agent)

[Handwritten Signature]

PS Form 3811, December 1991

U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

Z 392 979 045



Receipt for Certified Mail

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

PS Form 3800, March 1993

| | |
|---|--------------------|
| Send to | Hollis Elder |
| Street and No. | Jefferson Smurfitt |
| P.O., State and ZIP Code | Jak, FL 32201 |
| 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 | 6-19-95 |
| AC16-234532 | |



JEFFERSON SMURFIT CORPORATION

3755
2222

0103151

May 30, 1995

CERTIFIED - RETURN RECEIPT REQUESTED

Containerboard Mill Division

1915 WIGMORE STREET
P.O. BOX 150
JACKSONVILLE, FL 32201
TELEPHONE: 904/353-3611

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

SUBJECT: AIR PERMIT MODIFICATION 234532
AIR CONSTRUCTION PERMIT AC16-33885
JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL

Dear Mr. Fancy:

The purpose of this letter is to request an extension of the permit expiration date of the subject permit from July 1, 1995 to February 1, 1996. This request is being made in order to extend the permit beyond the Department's Title V Operating Permit Application date and the Application Completion Declaration Date.

Enclosed is a check in the amount of \$50 for the required fee for this modification to the subject permit.

Should there be any question about this request, please call Gene Tonn at 904/798-5662.

Very truly yours,

Hollis H. Elder
Vice President & General Manager

RECEIVED
SERIAL MAIL ROOM
1995 JUN - 1 PM 1:46

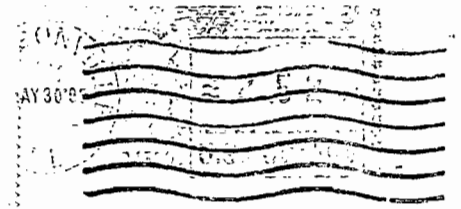
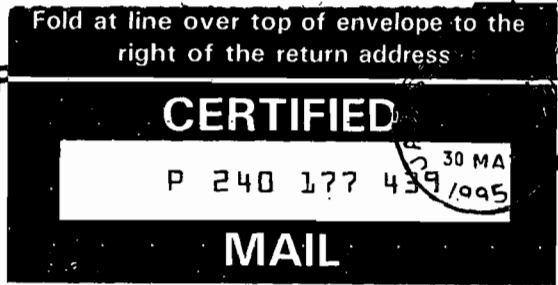
CR# P 240 177 439



JEFFERSON SMURFIT CORP

1915 WIGMORE STREET, P.O. BOX 150, JACKSONVILLE, FL 32201

Fold at line over top of envelope to the right of the return address



RETURN RECEIPT REQUESTED

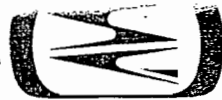
55048

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Division of Air Resources Management
Florida Dept. of Environmental Reg.
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
CERTIFIED MAIL - RETURN RECEIPT REQUESTED

32399-2400



Best Available Copy



JSC/CCA

JEFFERSON SMURFIT CORPORATION AND
CONTAINER CORPORATION OF AMERICA
401 Alton Street P.O. Box 276 Alton, IL 62002-2276

No. 1135459 0103151⁸¹

SCOTT CITY BANK & TRUST
A CORRESPONDENT OF BOATMEN'S BANK

DATE 05-30-95

PLANT NO.

13

The sum of 50 dollars and 00 cents

PAY TO THE ORDER OF
FLORIDA DEPT OF ENVIRONMENTAL REGULATION
2600 BLAIR STONE ROAD
TALLAHASSEE, FL 32399

THIS CHECK NOT VALID UNLESS PRESENTED FOR
PAYMENT WITHIN 180 DAYS FROM DATE OF ISSUE

*****\$50.00*****

AMOUNT

JEFFERSON SMURFIT CORPORATION

2ND SIGNATURE REQUIRED
IF OVER \$5,000

2ND SIGNATURE

2ND SIGNATURE



s your RETURN ADDRESS completed on the reverse side?

| | | | |
|--|--|--|--|
| <p>SENDER:</p> <ul style="list-style-type: none"> • 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 is delivered and the date delivered. | | <p>I also wish to receive the following services (for an extra fee):</p> <p>1. <input type="checkbox"/> Addressee's Address</p> <p>2. <input type="checkbox"/> Restricted Delivery</p> <p>Consult postmaster for fee.</p> | |
| <p>3. Article Addressed to:</p> <p>Mr. Hollis H. Elder Vice President and General Manager Jefferson-Smurfit Corporation Post Office Box 150 Jacksonville, Florida 32201</p> | | <p>4a. Article Number</p> <p>P 872 562 724</p> | |
| <p>5. Signature (Addressee)</p> | | <p>4b. Service Type</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured</p> <p><input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD</p> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> | |
| <p>6. Signature (Agent)</p> <p><i>Vince Wilson</i></p> | | <p>7. Date of Delivery</p> <p>5/27/94</p> | |
| <p>PS Form 3811, December 1991</p> | | <p>8. Addressee's Address (Only if requested and fee is paid)</p> | |

RECEIVED

MAY 31 1994

Bureau of
Air Regulation

Thank you for using Return Receipt Service

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

P 872 562 724



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

| | | |
|---|--|---------------------------------|
| Sent to | | Mr. Hollis H. Elder |
| Street and No. | | Post Office Box 150 |
| P.O., State and ZIP Code | | Jacksonville, FL 32201 |
| 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: 5/24/94 AC 16-234532 |

PS Form 3800, JUNE 1991

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 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 this03..... day of

March A.D. 19 94.

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

John Leist

VERA JANIE LIKENS
 MY COMMISSION # CC 222556 EXPIRES
 June 1, 1996
 BONDED THRU TROY FAIR INSURANCE, INC.

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 exceedence 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 proceedings. 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.

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. Hollis H. Elder
 Vice President and General Manager
 Jefferson-Smurfit Corporation
 P. O. Box 150
 Jacksonville, FL 32201

4a. Article Number
 P 872 562 604

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

7. Date of Delivery
 2-24-94

5. Signature (Addressee)

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

6. Signature (Agent)
Vince Ward

Thank you for using Return Receipt Service.

P 872 562 604



Receipt for Certified Mail

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

PS Form 3800, JUNE 1991

| | |
|---|----|
| Sent to Mr. Hollis H. Elder, JSC | |
| Street and No. P. O. Box 150 | |
| P.O., State and ZIP Code Jacksonville, FL 32201 | |
| 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: 2-18-94 Permit: AC 16-234532 | |

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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Hollis H. Elder
 Vice President & General Mgr.
 Jefferson-Smurfit Corporation
 Post Office Box 150
 Jacksonville, Florida 32201

4a. Article Number
 P 872 562 509

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

7. Date of Delivery
 12-20-93

5. Signature (Addressee)

6. Signature (Agent)
Vince Elder

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

Thank you for using Return Receipt Service.

P 872 562 509



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

PS Form 3800, JUNE 1991

| | |
|---|----|
| Sent to Mr. Hollis H. Elder | |
| Street and No. P. O. Box 150 | |
| P.O., State and ZIP Code Jacksonville, FL 32201 | |
| 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: 12/14/93 AC 16-234532 (PSD-FL-207) | |



JEFFERSON SMURFIT CORPORATION

November 11, 1993

Containerboard Mill Division

1915 WIGMORE STREET
P.O. BOX 150
JACKSONVILLE, FL 32201
TELEPHONE: 904/353-3611

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulations
Division of Air Resources Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-5400

RECEIVED

NOV 19 1993

Division of Air
Resources Management

SUBJECT: NO. 10 COAL/BARK BOILER
PERMIT NO. AO16-185036
JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL

Dear Mr. Fancy:

After carefully considering comments from your staff and other information available to us, we have reassessed our position on controlling NO_x emission from No. 10 Boiler. By this letter we are revising our application to modify the construction and operation permits for the subject boiler.

Since it has become clear that some reduction of NO_x emission is appropriate to complete this modification, we propose a new NO_x emission limit of 274.9 lb/hr and 1203.9 tons/year, which equates to a rate of 0.51 lb/MMBtu at 540 MMBtu/hr heat input. This is a reduction of 148.2 tons/year from the current allowable emissions, and an increase of less than 40 tons/year from current actual emissions as supported by the attached calculations. Since this would not be a significant net emissions increase as defined in FAC 17-212.400(2)(e)2., the modification would not be subject to PSD/BACT review for NO_x.

To meet this tighter NO_x emission limit, Jefferson Smurfit Corporation (JSC) may have to implement new NO_x control measures on the boiler, which at this time has not been determined. As you know, the selection and installation process for new control measures requires a thorough evaluation of the options available; the appropriation of the money for the project once an option is selected; and time for the engineering, installation if necessary, debugging, and testing. The entire process may take up to 18 months, depending on the technology selected.

As you recall, the main reason for this modification is one of economics critical to the



JEFFERSON SMURFIT CORP

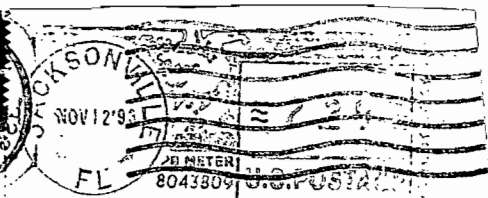
1915 WIGMORE STREET, P.O. BOX 150, JACKSONVILLE, FL 32201

Fold at line over top of envelope to the right of the return address

CERTIFIED

P 240 176 818

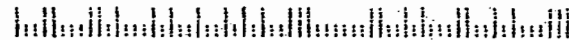
MAIL



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulations
Division of Air Resources Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-5400

33742-4512



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

4a. Article Number
 P 872 562 480

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

7. Date of Delivery
 10-12-93


5. Signature (Addressee)
Hollis H. Elder

6. Signature (Agent)

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

Thank you for using Return Receipt Service.

P 872 562 480



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

| | |
|---|----|
| Sent to Mr. Hollis H. Elder | |
| Street and No. P. O. Box 150 | |
| P.O., State and ZIP Code Jacksonville, FL 32201 | |
| 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: 10/12/93
 AC 16-234532

PS Form 3800, JUNE 1991

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. Hollis H. Elder,
Vice President and Gen. Mgr.
Jefferson Smurfit Corp.
P. O. Box 150
Jacksonville, FL 32201

4a. Article Number
P 230 524 397

4b. Service Type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

7. Date of Delivery
8-26-93

5. Signature (Addressee)
Vince Ward

6. Signature (Agent)

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

Thank you for using Return Receipt Service.

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

P 230 524 397

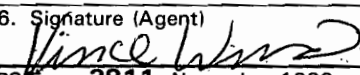


Receipt for Certified Mail

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

| | |
|---|----|
| Sent to Mr. Hollis H. Elder, JSC | |
| Street and No. P. O. Box 150 | |
| P.O., State and ZIP Code Jacksonville, FL 32211 | |
| 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: 8-13-93 Permit: AC 16-234532 PSD-FL-207 | |

PS Form 3800, June 1991

| | | | |
|---|--|---|--|
| 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. "Return Receipt Requested" on the mailpiece below the article number. Receipt Fee will provide you the signature of the person delivered. | | I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee. | |
| Mr. Hollis Elder Manager Jefferson Smurfit Corp. Containerboard Mill Division 1915 Wigmore Street Jacksonville, FL 32201 | | 4a. Article Number P 062 922 024 | |
| | | 4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise | |
| | | 7. Date of Delivery 1-26-93 | |
| 5. Signature (Addressee) | | 8. Addressee's Address (Only if requested and fee is paid) | |
| 6. Signature (Agent)  | | | |
| PS Form 3811, November 1990 ☆ U.S. GPO: 1991-287-066 | | DOMESTIC RETURN RECEIPT | |

P 062 922 024



Receipt for Certified Mail

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

PS Form 3800, June 1991

| | |
|---|----|
| Sent to Mr. Hollis Elder, Jefferson | |
| Street and No. Smurfit Corp. 1915 Wigmore Street | |
| P.O., State and ZIP Code Jacksonville, FL 32201 | |
| 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: 1-22-92 Permit: A016-185236 | |