

Check Sheet

Company Name: JACKSONVILLE LEAF
Permit Number: AC 16-100739
PSD Number: _____
Permit Engineer: _____

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

Cross References:

-
-
-

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT Determination
- Unsigned Permit

Correspondence with:

- EPA
- Park Services
- Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)
- Waiver of Department Action
- Other

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. R. G. Carovano
Executive Vice President
Jacksonville Kraft Paper Company
Post Office Box 18019
Jacksonville, Florida 32229

January 8, 1986

Enclosed is Permit Number AC 16-109739, to Jacksonville Kraft Paper Company which authorizes the construction of a petroleum coke handling and storage system at your existing facility in Jacksonville, Duval County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this 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 32301; 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 permit is filed with the clerk of the Department.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Enclosure

cc: Johnny Cole
Jerry Woosley

CERTIFICATION

This is to certify that the foregoing Notice of Permit and all copies requested were mailed before the close of business on 9 JANUARY, 1986.



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Patricia B. Adams
Clerk

Jan. 9, 1986
Date

Final Determination

Jacksonville Kraft Paper Company, Inc.
Jacksonville, Florida
Duval County

Petroleum Coke Handling and Storage System

Permit Number:
AC 16-108739

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

January 3, 1986

Final Determination
Jacksonville Kraft Paper Company, Inc.
AC 16-108739

The Technical Evaluation and Preliminary Determination for the proposed petroleum coke handling and storage system was distributed on October 11, 1985. Copies of the evaluation were available for public inspection at the county and district offices in Jacksonville and the Bureau of Air Quality Management office in Tallahassee. The Notice of Proposed Agency Action on the permit application was published in the Florida Times Union on November 25, 1985.

Comments in the department's intent to issue the permit were submitted by Bio-Environmental Services. They requested that the particulate matter standard be listed in the permit and that the company submit the application for permit to operate to them. The department concurs with this request.

The final action of the department will be to issue the construction permit as proposed in the Technical Evaluation and Preliminary Determination except for the change noted above.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:

Jacksonville Kraft Paper Co.,
Inc.
P. O. Box 18019
Jacksonville, Florida 32229

Permit Number: AC 16-108739
Expiration Date: December 31, 1986
County: Duval
Latitude/Longitude: 30° 25' 15" N
81° 36' 00" W
Project: Petroleum Coke Handling
and Storage System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the construction of a REDICOKE petroleum coke handling and storage system consisting of a pneumatic truck unloading system that uses 450 ACFM at 15 psig of air to transfer 20 TPH of petroleum coke to a 14 foot diameter by 80 foot high storage silo. The silo is equipped with a MAC model 72 AVS 25 fabric filter. An enclosed screw conveyor is used to transfer the coke from the silo to a rotary valve, and two pneumatic transport systems that take 250 CFM of air each are used to transport up to 2.2 TPH of coke to existing process equipment (lime kilns). This permit does not authorize the combustion of the petroleum coke in the lime kilns or other process equipment. This system will be located at the existing kraft pulp mill at 9469 Eastport Road, Jacksonville, Duval Co., Florida. The UTM coordinates of this site are zone, 17, 441.8 km E and 3365.6 km N.

The modifications shall be in accordance with the plans and schedule submitted by the permittee and attached to the permit except for the changes mentioned in the Technical Evaluation and Preliminary Determination.

Attachments are as follows:

1. Application dated August 20, 1985.
2. BES October 29, 1985 letter

PERMITTEE:
Jacksonville Kraft Paper Co.,
Inc.

Permit Number: AC 16-108739
Expiration Date: December 31, 1986

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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 acknowledgement 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.

PERMITTEE:
Jacksonville Kraft Paper Co.,
Inc.

Permit Number: AC 16-108739
Expiration Date: December 31, 1986

GENERAL CONDITIONS:

6. The permittee shall at all times 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.

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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Jacksonville Kraft Paper Co.,
Inc.

Permit Number: AC 16-108739
Expiration Date: December 31, 1986

GENERAL CONDITIONS:

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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD).
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Jacksonville Kraft Paper Co.,
Inc.

Permit Number: AC 16-108739
Expiration Date: December 31, 1986

GENERAL CONDITIONS:

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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 submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The petroleum coke handling and storage system shall not handle more than 20 TPH of coke and the conveyor equipment shall not operate more than 1,000 hours per year without prior approval by the Department.
2. Petroleum coke shall not be transferred to the silo unless the fabric filter is operating properly.
3. All covers and openings in the material handling and storage system shall remain sealed during its operation. Any leak in the pneumatic system that allows particulate matter to escape to the atmosphere shall be repaired promptly.

PERMITTEE:
Jacksonville Kraft Paper Co.,
Inc.

Permit Number: AC 16-108739
Expiration Date: December 31, 1986

SPECIFIC CONDITIONS:

4. Visible emissions from the fabric filter or any other components of the petroleum coke handling and storage system as determined by EPA Method 9 described in 40 CFR 60, Appendix A, shall not exceed 5 percent opacity, 6 minute average. The Company shall conduct annual tests to confirm compliance with this standard. Particulate matter emissions shall not exceed 0.08 lb/hr and 0.04 TPY. Test by Method 5 (40 CFR 60, appendix A) may be required if the visible emissions exceed 5 percent opacity.

5. If the permittee is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit (Rule 17-4.09 Florida Administrative Code).

6. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to the Division of Bio-Environmental Services within 45 days of start up or 90 days prior to the expiration date of the construction permit, whichever occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rule 17-4.22 and 17-4.23, Florida Administrative Code)

7. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4.10, Florida Administrative Code)

8. Upon obtaining a permit to operate, the permittee will be required to make periodic compliance tests and to submit annual operation reports to the Division of Bio-Environmental Services.

Issued this 7 day of January
1986.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


VICTORIA J. TSCHINKEL, Secretary

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

RECEIVED

TO: _____ LOCTN: _____ JAN 08 1986

TO: _____ LOCTN: _____ JAN 3 1986

TO: _____ LOCTN: _____

FROM: _____ DATE: _____

BAOM
Office of the Secretary

TO: Victoria J. Tschinkel

FROM: Clair Fancy *Clair Fancy*

DATE: January 3, 1986

SUBJECT: Approval of a Permit to Construct an Air Pollution Source.

Attached for your approval and signature is the Final Determination and Construction Permit for a petroleum coke storage and handling system for Jacksonville Kraft Paper Company, Inc. The bureau recommends the construction permit be issued.

Day 90, after which the permit would be issued by default, is January 19, 1986.

CF/WH/p

Attachments: Final Determination

P 408 533 651

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. R. G. Carovano	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 1/9/86	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:
Mr. R. G. Carovano
Jacksonville Kraft Paper Co.
Post Office Box 18019
Jacksonville, FL 32229

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input checked="" type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 408 533 651

Always obtain signature of addressee or agent and **DATE DELIVERED.**

- Signature - Addressee
X P.O. Box 18019
- Signature - Agent
X Mucky Wood
- Date of Delivery
1-11-86
- Addressee's Address (ONLY if requested and fee paid)

ABV

DOMESTIC RETURN RECEIPT

DER
DEC 13 1985
BAQM

The Florida Times-Union



Jacksonville Journal

FLORIDA PUBLISHING COMPANY
Publishers
JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared George A. DAN

_____ who on oath says that he is
Retail Advertising Manager
_____ of The Florida Times-Union, and
Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,
Florida; that the attached copy of advertisement, being a _____

Legal Notice

in the matter of Dept. of Environmental Reg.

in the _____ Court,

was published in The Florida Times Union

in the issues of Nov. 25

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me
this 25th day of

Nov. A.D. 1985

Notary Public,
State of Florida at Large.

My Commission Expires

OF FLORIDA
Feb. 19, 1989

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action
on Permit Application

The Department of Environmental Regulation gives notice of its intent to issue a permit to Jacksonville Kraft Paper Company, Inc., that will authorize the construction of a petroleum coke handling and storage system. The system will be located at the company's kraft pulp mill on 9469 Eastport Road in Jacksonville, Duval County, Florida.

The system will handle up to 20 TPH petroleum coke which will be used as a supplementary fuel in the existing process equipment. The emissions from the coke handling and storage system will be less than 1 TPY. The emissions from this system will not cause an increase in the ambient air concentration of particulate matter at ground level above the de minimus level. A best available control technology determination was not required for the proposed system.

Persons 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 conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period constitutes a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2609 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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:

Dept. of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207
Duval County Dept. of Health, Welfare and Bio-Environmental Service
515 West 6th Street
Jacksonville, Florida 32206
Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination.

C. H. FANCY, P.E.
DEPUTY CHIEF, Bureau of
Quality Management
TWIN TOWERS,
2600 BLAIR STONE Rd
Tallahassee, FL 32301

DEAR MR FANCY:

Enclosed is a copy of the NOV. 25, 1985 Florida
Times-Union in which we have published in the
Legal Section the public notice of the proposed
Agency Action regarding the permit for the
Petroleum Coke Landfill system.

I trust this will fulfill our requirements and
the process will move along

Yours Sincerely
D. A. Romnes
Environ + Tech Manager.

11-25-85

DER

NOV 27 1985

BAQM

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action
on Permit Application

The Department of Environmental Regulation gives notice of its intent to issue a permit to Jacksonville Kraft Paper Company, Inc., that will authorize the construction of a petroleum coke handling and storage system. The system will be located at the company's kraft pulp mill on 9469 Eastport Road in Jacksonville, Duval County, Florida.

The system will handle up to 20 TPH petroleum coke which will be used as a supplementary fuel in the existing process equipment. The emissions from the coke handling and storage system will be less than 1 TYP. The emissions from this system will not cause an increase in the ambient air concentration of particulate matter at ground level above the de minimus level. A best available control technology determination was not required for the proposed system.

Persons 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 conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period constitutes a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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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:

Dept. of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207
Duval County Dept. of Health, Welfare
and Bio-Environmental Service
515 West 6th Street
Jacksonville, Florida 32206
Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Any person may send written comments on the proposed action to Mr. Bill Thomas of the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination.

The initial owner and operator of facility will be Pompier Investments, L.P., Florida limited partnership.

C. The third facility will be known as Marsh Oaks Apartments (a multi-family residential housing project which will consist of approximately 120 units and related facilities). The facility will be located on approximately 8.2 acre site located in Mayport area of Jacksonville, Duval County, Florida. The site is located on the west side of Highway A-1-A approximately one-half mile north of the intersection of Highway A-1-A and Mayport Road, and is bounded east of Oak Harbor, a single family subdivision.

The initial owner and operator of facility will be Marsh Oaks Associates, Florida partnership, one of whose general partners will be James E. Pilla of Jacksonville, Florida.

D. The fourth facility will be known as Oaks of Argyle Apartments (a multi-family residential housing project which will consist of 280 units and related facilities). The facility will be located in the westside area of Jacksonville, Duval County, Florida. The site is located in the Argyle Forest Planned Unit Development on the north side of Youngerman Circle.

The initial owner and operator of facility will be Argyle Apartments Limited.

E. The fifth facility will be known as Falls Apartments (a multi-family residential housing project which will consist of approximately 280 units and related facilities). The facility will be located on an approximately 14.0 acre site located in the westside area of Jacksonville, Duval County, Florida. The site is located in the Argyle Forest Planned Unit Development on the north side of Youngerman Circle. The site is bounded on the north by Interstate Highway 295.

The initial owner and operator of facility will be Jerry L. McGinty, Inc., Texas corporation.

The Bonds will be issued only for the above described facilities.

The Bonds shall not constitute or create a legal obligation, general or special, debt, liability, moral obligation of the Duval County Housing Finance Authority, the City of Jacksonville State of Florida or any political subdivision thereof. The Bonds shall never constitute or create a charge against the credit or the power of the State of Florida or any political subdivision thereof. Neither the Duval County Housing Finance Authority, the City of Jacksonville, the State of Florida nor any political subdivision thereof shall in any manner be liable for the payment of the Bonds or for the performance of any agreement or pledge of any kind which may be undertaken by the Issuer and no breach by the Issuer of any agreement shall create any obligations upon the State of Florida nor any political subdivision thereof.

The Issuer shall conduct the Public Hearing on Monday, December 9, 1985, at 8:30 a.m. in the City Council Chambers, 15th Floor, City of Jacksonville, 220 E. Bay Street, Jacksonville, Florida, for the purpose of receiving comments on or hearing any objections (verbal or written) to the proposed issuance of the Bonds for the project described.

Subsequent to such hearing, the City Council of the City of Jacksonville, Florida, shall determine whether or not to approve the issuance of the Bonds.

DUVAL COUNTY HOUSING FINANCE
AUTHORITY
/s/ Glenn M. Swicegood
Chairman

Date: November 20, 1985

File

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division
Air and Water Pollution Control



August 15, 1985

Mr. Bob Romnes
Jax Kraft Paper Company
P. O. Box 18019
Jacksonville, FL 32229

Dear Mr. Romnes:

This letter serves to document our earlier conversation regarding the burning of petroleum coke in the lime kilns; and also to respond to Mr. R. G. Carovano's request of August 5, 1985 concerning the same subject.

If there is an emissions increase from the burning of petroleum coke, its use constitutes a modification and therefore a construction permit will have to be obtained for lime kilns in addition to the Petroleum Coke Handling System.

If there is no emissions increase from the burning of coke, construction permits will not be required for the lime kilns; however, the Petroleum Coke Handling System will still have to be permitted.

An emissions increase will result when the particulate emissions from the burning of coke in the lime kilns is greater than the baseline particulate emissions from the lime kiln. The baseline particulate emissions are an average of the actual TSP emissions (as documented in emissions tests) for the last two years.

Very truly yours,

Khurshid Mehta, P.E.
Pollution Control Engineer

cc: John Brown, P.E., District Office, DER
Willard Hanks, DER, Tallahassee ✓
File/1735-I

KM/bm

DER
AUG 19 1985
BAQM



THIS CHECK IS IN SETTLEMENT OF THE FOLLOWING INVOICES.

DATE	AMOUNT
Petroleum Coke Permit	-
Lime Kiln	

JACKSONVILLE KRAFT PAPER CO. INC.

360

August 22 19 85

1-8/210

PAY TO THE ORDER OF

State of Florida
Department of Environmental Regulations

\$ 100.00 ****

THE SUM OF 100 DOLLARS 00 CTS

DOLLARS

CORRECT ENDORSEMENT IS RECEIPT

Citibank, N.A.
5671 Riverdale Ave.
Nr. 259th St.
Bronx, N.Y. 10471

CITIBANK

AMERICAN

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No. 76085

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Jacksonville Kraft Paper Co., Inc Date August 23, 1985

Address P.O. Box 18019 Jacksonville, FL 32229 Dollars \$ 100.00

Applicant Name & Address Same as above.

Source of Revenue _____

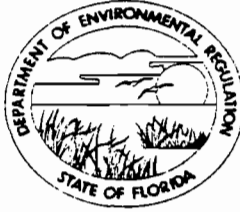
Revenue Code 001031 Application Number AC 16-108739

By Patricia G. Adams

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

G. DOUG DUTTON
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [X] New¹ [] Existing¹
APPLICATION TYPE: [X] Construction [] Operation [] Modification
COMPANY NAME: Jacksonville Kraft Paper Company, Inc. 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) Lime Kiln Petroleum Coke Storage Bag House

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville
UTM: East 7441800M North 3365.650M
Latitude 30 ° 25 ' 15 "N Longitude 81 ° 36 ' 00 "W

APPLICANT NAME AND TITLE: R. G. Carovano, Executive Vice President

APPLICANT ADDRESS: P.O. Box 18019, Jacksonville, Florida 32229

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Jacksonville Kraft

I certify that the statements made in this application for a 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: *R. G. Carovano*

R. G. Carovano, Executive Vice President
Name and Title (Please Type)

Date: 8/20/85 Telephone No. (904) 751-1400

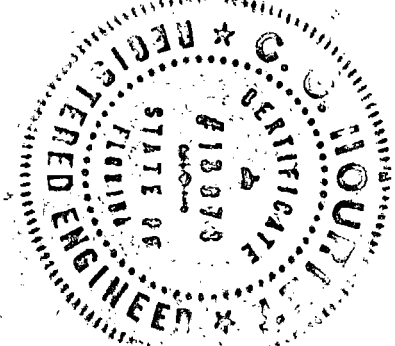
B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

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)

DER

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 C. G. Houriet, P.E.

C. G. Houriet, P.E.
Name (Please Type)

Jacksonville Kraft Paper Company, Inc.
Company Name (Please Type)

P.O. Box 18019, Jacksonville, Florida 32229
Mailing Address (Please Type)

Florida Registration No. 13973 Date: 8-20-85 Telephone No. (904) 751-1400

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.

This application is for a construction permit to install a petroleum coke storage system for feeding petroleum coke to the lime kilns. The system is equipped with a baghouse for controlling and reducing particulate emissions to the atmosphere.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction 9/15/85 Completion of Construction 10/15/85

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.)

Equipment cost to be included with price of product.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

None - new source

E. Requested permitted equipment operating time: hrs/day 6.1; days/wk 3; wks/yr 52; if power plant, hrs/yr N/A; if seasonal, describe: N/A

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? no

a. If yes, has "offset" been applied? _____

b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. No. RACT

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

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

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? Probably

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? Yes

a. If yes, for what pollutants? Particulate matter

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 justification for any answer of "No" that might be considered questionable.

The source is located in the area of influence of a particulate nonattainment area.

Operating time $\frac{952 \text{ hrs}}{52 \text{ wk yr}} = 18.3 \frac{\text{hrs}}{\text{wk}}$ or $6.1 \frac{\text{hrs}}{\text{day}}$ 3 days/wk.

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Petroleum Coke	N/A	N/A	40,000	18

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

1. Total Process Input Rate (lbs/hr): * 40,000#/hr unloading rate

2. Product Weight (lbs/hr): ** 39,999.9#/hr delivered to storage

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 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	
Petroleum Coke	N.D.	N.D.	5% opacity ^a	5% opacity	733,000 ^b	366.5	18

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).

* 20 tons/hr x 2000#/ton = 40,000#/hr unloading rate (design)

** 40,000#/hr (input) - 0.077#/hr emissions = 39,999.923#/hr (design)

a 17-2.650 (2) (12) b

b Manufacturer's design factor - emission rate of 0.02 gr/CF @ 99.99% efficiency 73.3#/hr / 0.0001 = 733,000#/hr

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)
Baghouse Mfg by	Petroleum Coke	99.99%	100 MESH to 5 microns	Mfg's guarantee
MAC				
AVS filter				

E. Fuels N/A

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ 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 N/A Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

N/A

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 85 ft. Stack Diameter: 10" x 20" ft.
 Gas Flow Rate: 450 ACFM 450 DSCFM Gas Exit Temperature: ambient °F.
 Water Vapor Content: No data % Velocity: 5.4 FPS

Not applicable

SECTION IV: INCINERATOR INFORMATION

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 Believed not applicable

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 N/A

A. Company Monitored Data

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. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

2. Surface data obtained from (location) _____

3. Upper air (mixing height) data obtained from (location) _____

4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ 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	_____ grams/sec
SO ²	_____ grams/sec

E. Emission Data Used in Modeling

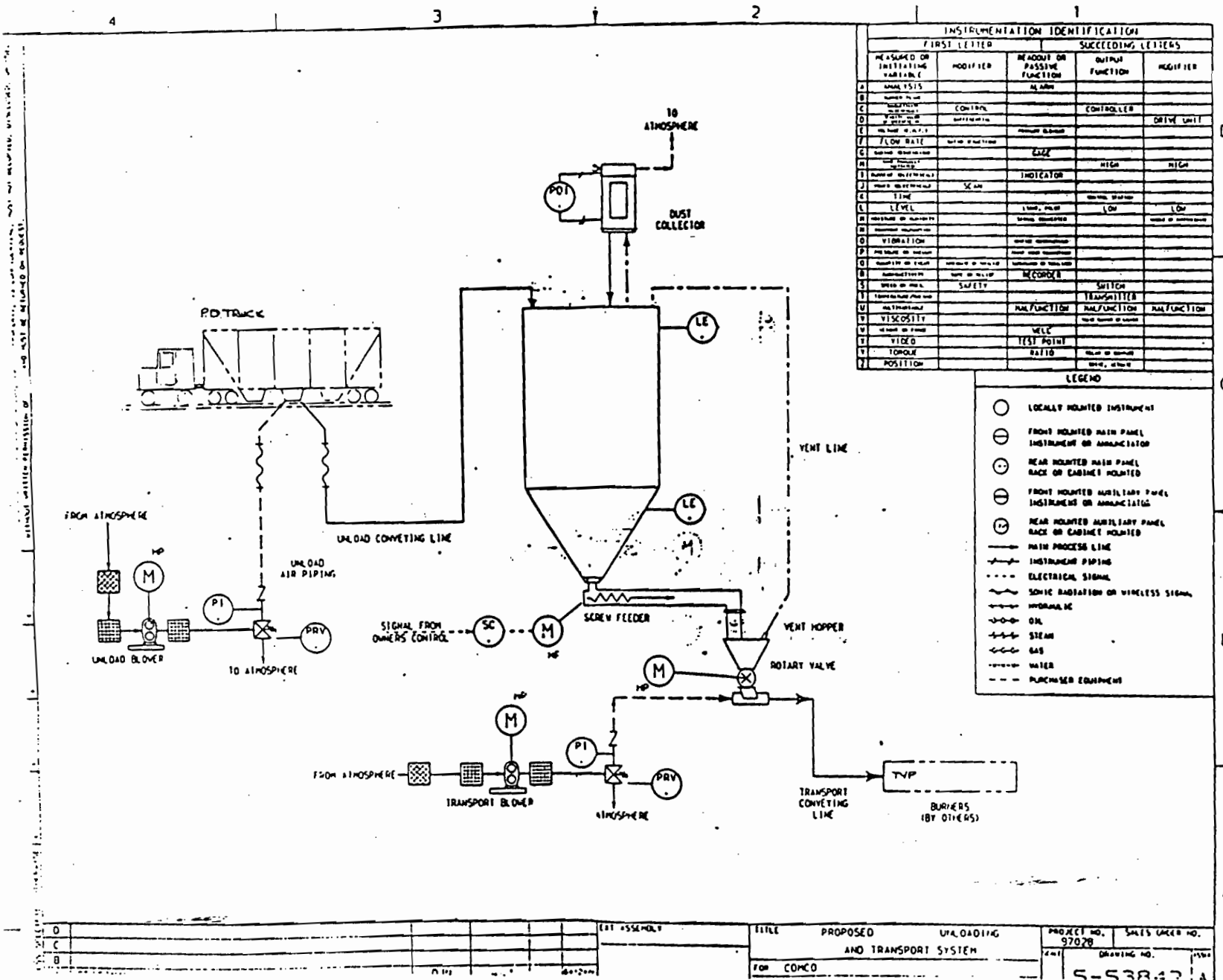
Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

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.

BEST AVAILABLE COPY

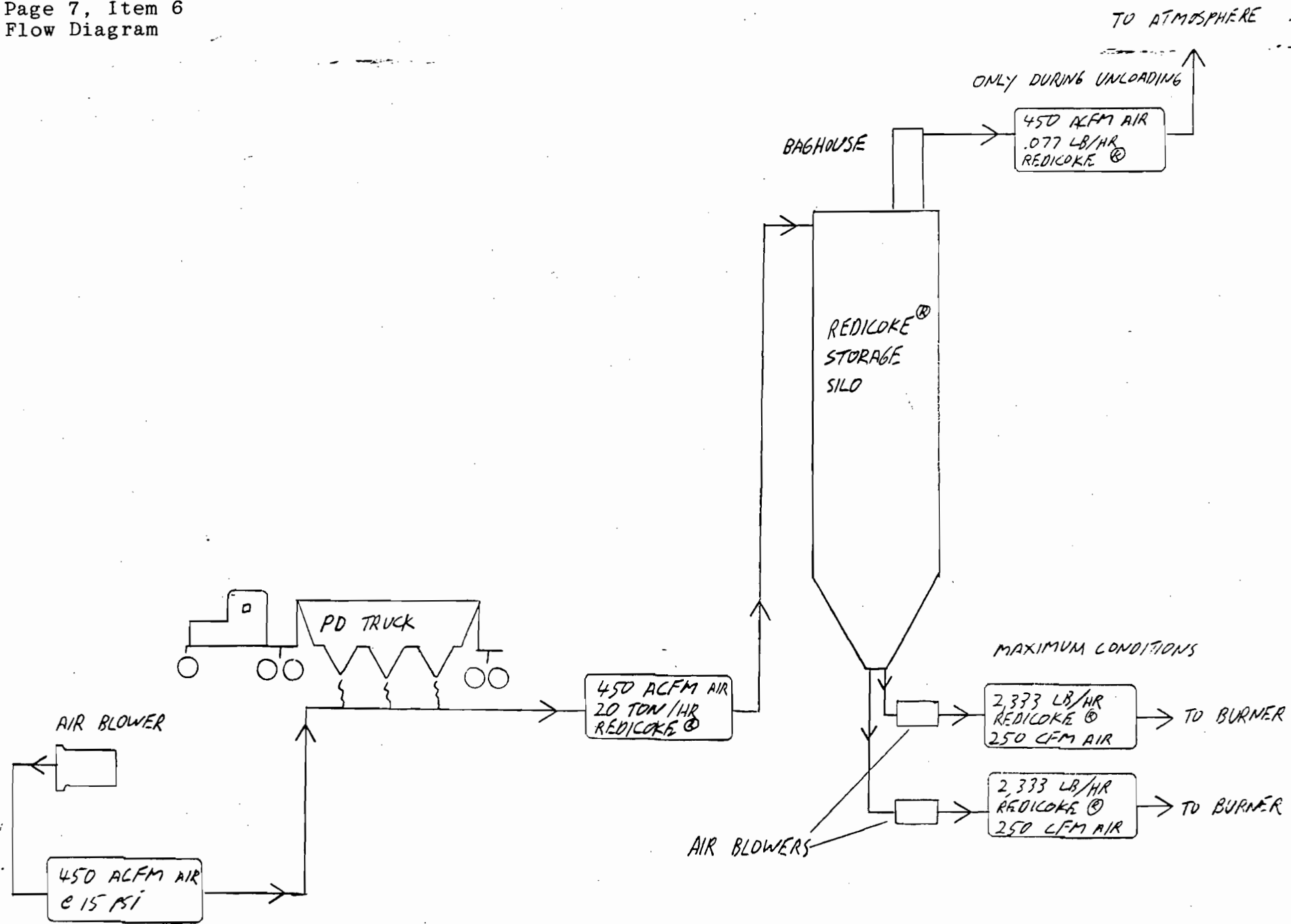


INSTRUMENTATION IDENTIFICATION				
FIRST LETTER		SUCCEEDING LETTERS		
MEASURED OR INITIATING VARIABLE	MODIFIER	READOUT OR PASSIVE FUNCTION	OUTPUT FUNCTION	REGISTER
A	ALARM	ALARM		
B	BACKUP			
C	CONTROL		CONTROLLER	
D	DRIVE			DRIVE UNIT
E	EMERGENCY STOP			
F	FLOW RATE			
G	GAUGE			
H	HOLD			
I	INDICATOR			
J	JOG			
K	KEY			
L	LEVEL			
M	MOTOR			
N	NOISE			
O	OVER			
P	POSITION			
Q	QUALITY			
R	RECORD			
S	SAFETY			
T	TEMPERATURE			
U	UNIFORMITY			
V	VISCOUSITY			
W	WEIGHT			
X	X-RAY			
Y	YIELD			
Z	ZONE			

LEGEND	
○	LOCALLY MOUNTED INSTRUMENT
⊖	FRONT MOUNTED MAIN PANEL INSTRUMENT OR ANNUNCIATOR
⊙	REAR MOUNTED MAIN PANEL RACK OR CABINET MOUNTED
⊕	FRONT MOUNTED AUXILIARY PANEL INSTRUMENT OR ANNUNCIATOR
⊗	REAR MOUNTED AUXILIARY PANEL RACK OR CABINET MOUNTED
—	MAIN PROCESS LINE
—	INSTRUMENT PIPING
---	ELECTRICAL SIGNAL
~	SONIC RADIATION OR WIRELESS SIGNAL
—	HYDRAULIC
→	OIL
→	STEAM
→	GAS
→	WATER
---	PURCHASED EQUIPMENT

PROP 2 FROM 5

DESIGNED BY	DATE	APP'D BY	DATE	PROJECT NO.	SALES ORDER NO.
DRAWN BY		CHECKED BY		97079	
TITLE	PROPOSED UNLOADING AND TRANSPORT SYSTEM	FOR COMCO		DRAWING NO.	5-53847



REDICOKE® EQUIPMENT SUPPLY

REDICOKE® fuel will be produced at a COMCO owned and operated regional processing plant, transported to Jax Kraft in dry bulk form, stored in the REDICOKE® Storage System and transferred to and fired in the kilns.

COMCO will undertake single-source responsibility on a turn-key basis for the design, procurement, and installation of systems for receiving, storing, and firing REDICOKE® fuel in Jax Kraft's kilns at their mill.

The installed system will meet the prior approval of Jax Kraft and will comply with applicable local, state, and federal laws, codes, and regulations.

The REDICOKE® Retrofit System package consists of:

1. Railcar unloading system including pneumatic air blower (450 CFM, 15 psi max.), which will provide the conveying air to transfer REDICOKE® from the pressure-differential (PD) railcar to the REDICOKE® storage silo. The railcar unloading system will include an air distribution header, a material receiving header, and provide quick disconnect points to handle the PD truck. All pneumatic line connections (pipe hangers

supports, etc.) will be installed to link the railcar unloading system to the REDICOKE® storage silo. All transfers are accomplished through sealed connections to minimize air and moisture entrainment and house-keeping problems.

2. A REDICOKE® Storage System including a storage silo (14' Dia. x 80' Ht.), motor control center, control panel, baghouse, level indicators, appropriate operator-access ladders, and handrails. A control system will maintain the REDICOKE® Storage System in safe operational condition and respond "to a local, operator-designated feed control" for REDICOKE® flow control to each independently operated burner/kiln. REDICOKE® Storage System's fuel level will be monitored and alarmed at preset levels.

3. A REDICOKE® Transfer System including pulverized coke feeders, pneumatic blowers, and conveying lines for the kiln units will be provided. REDICOKE® fuel will be conveyed to the burner by independently operated combination variable speed DC drive screw feeders and rotary airlock valves. Ten psi air blowers will provide the conveying air transfer media to the kilns at approximately 4500 Ft/Min. An output signal (by customer) from the combustion controls will shut off the REDICOKE® Fuel supply should a flame-out condition occur at either kiln.

2 SECTION

DATA SHEET
AIR VENT FILTERS
 Effective 1-7-85
 Supersedes 1-25-84

MAC

P.O. Box 205 • Sabetha, Kansas 66534 • Phone 913 284-2191
 Telex II No. 910-749-6500



AVS FILTER

**STANDARD SPECIFICATIONS FOR
 MAC MODEL AVS FILTERS**

Materials of Construction

- 12 ga. carbon steel construction (17" Wg.)
- Full welded exterior
- Skip welded interior 96" bags and larger
- 36 bag units and larger have reinforced housing and tube sheet.
- Housing flanges L1 1/2 x 1 1/2 x 3/16
- Hopper top flange and discharge flange bar 1/4 x 1 1/2

Arrangement

- Service door & header at 3:00
- Exhaust at 9:00
- Inlet at 9:00 (Flanged hopper does allow for rotating hopper relative to housing on 90° increments)

Major Components

- Timing board enclosures: NEMA 12
- Venturi nozzle and bag cups: Mineral reinforced nylon
- Bag cages: Galvanized carbon steel
- Bags: 12 oz. singed, polyester dacron
- Bag Cup Caulk: G.E. #1200 Silicone
- Lifting lugs: Two on top plenum
- Service Door:
 - 18" long bags: 18" x 15" tall, bolted manhole
 - Bags longer than 18": 18" wide, hinged (to left side) service door
- Inlet: Note flange and size must be specified.
- Exhaust: Flanged and sized per drawing D00064
- Discharge: Flanged, sized per D00064
- Pressure differential gauge kit

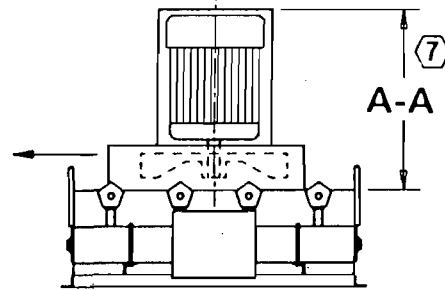
Style II Filter

Same as III only LESS: Hopper and Inlet

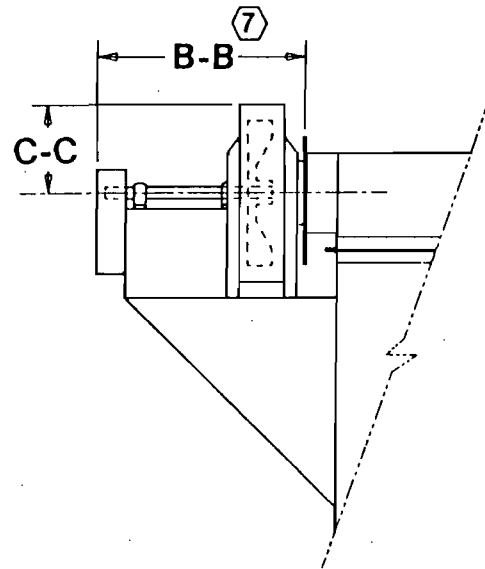
Painting

- Standard cleaning & metal preparation
- Interior and exterior primed with one coat 32x29 gray primer
- Exterior to have one finish coat
- Color to be specified
- Standard colors are MAC Green, Blue or White

NOTE: To completely specify a standard filter, the model designation must be accompanied by the inlet size.

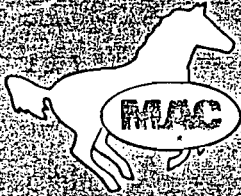


TOP MOUNTED FAN



SIDE MOUNTED FAN

FAN	A-A	B-B	C-C
9	11 1/2	18 1/4	7 1/2
10	12 1/2	18 1/2	8 5/8
12	15 1/4	21 1/4	10
17	28	34	11 1/2
21	29 1/4	35 1/4	13 3/8
25	35 5/8	41 5/8	15 13/16



MAC

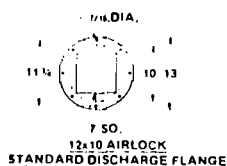
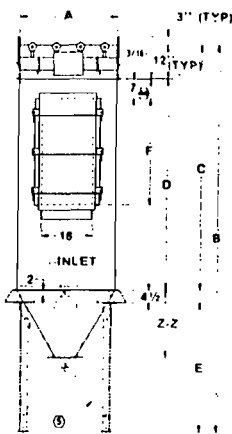
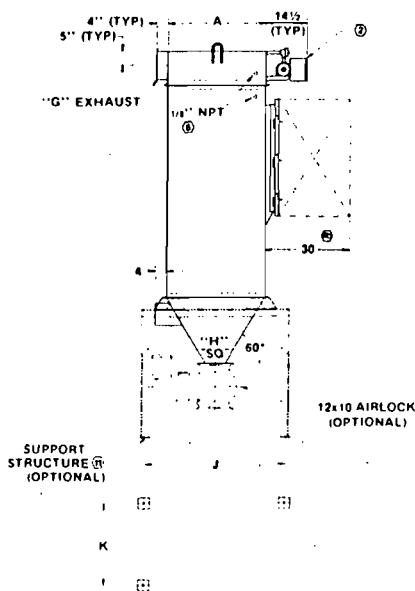
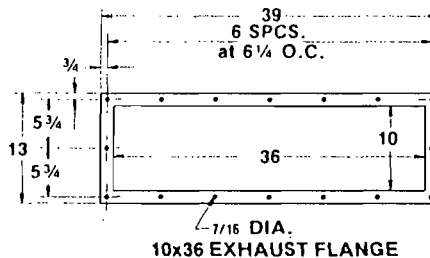
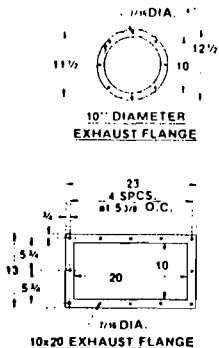
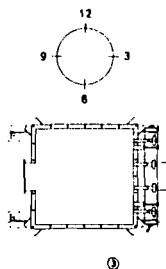
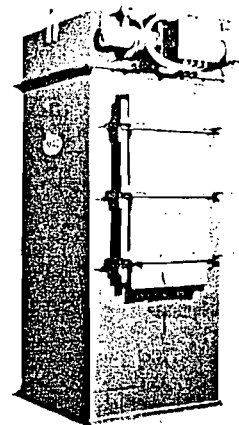
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Telex II No. 910-749-6500

SECTION **2**

DATA SHEET
AIR VENT FILTERS
Effective 1-7-85
Supersedes 1-25-84

AVS FILTER



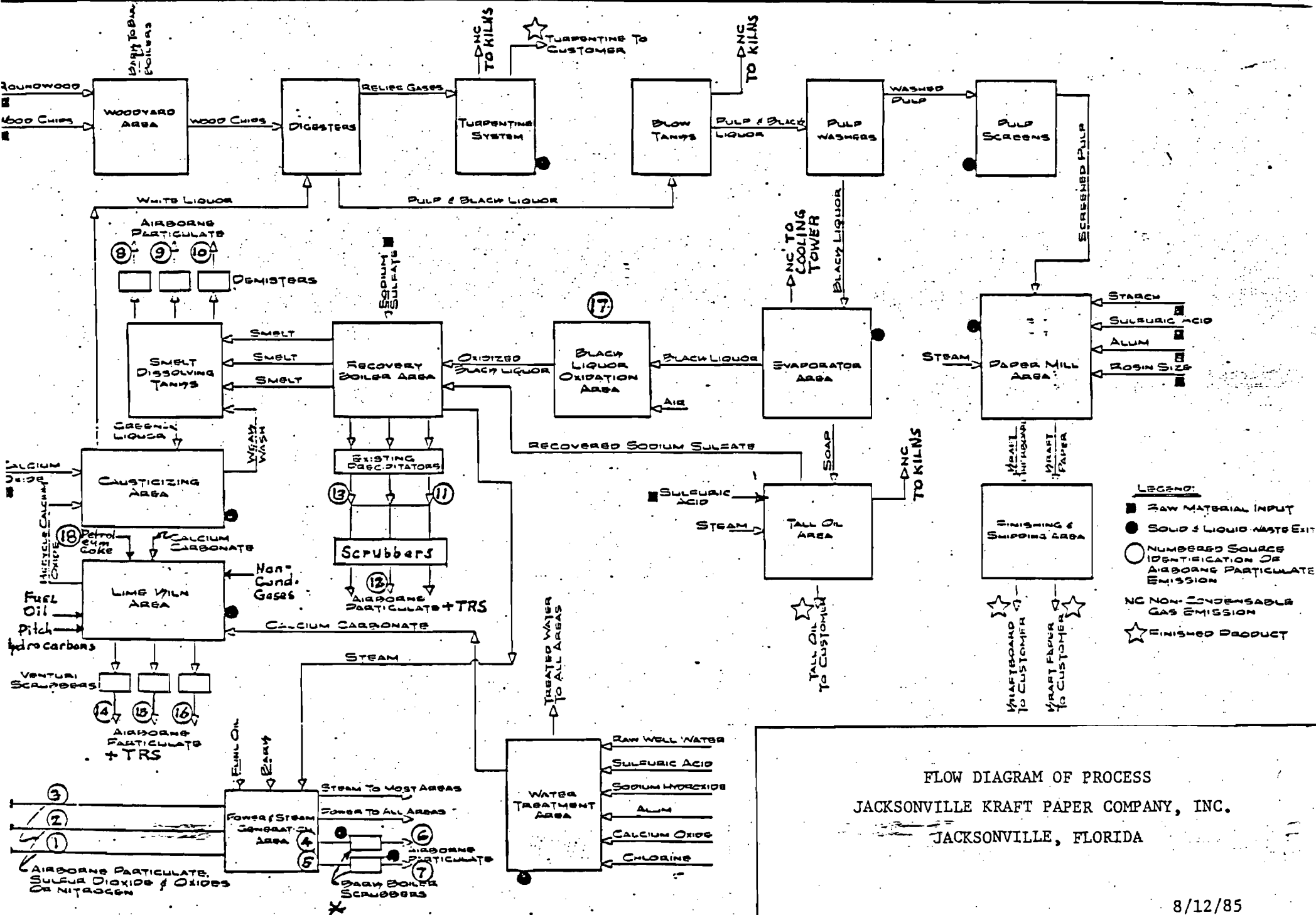
NOTES:

- ① All dimensions in inches.
- ② Timer control panel, 110 volts required.
- ③ 3/4" NPT, both ends, 90-100 PSI, clean, dry air required. See SCFM for volume.
- ④ a) Filters with 18" bags have bolted service doors, this dimension will be 3 1/2"
- b) Minimum for hinged service door to open completely.
- ⑤ AVS36 and AVS64 have x-braces on all four sides.
- ⑥ 1/8" NPT must have pipe plug, if differential pressure gauge is not used.
- ⑦ This is a maximum dimension for fans with v-belt drive, direct drive fans will be shorter.
- ⑧ Airlocks, other than those shown, may require special support frame.
- ⑨ AVS9 with airlock equipped with drive no. 1 or no. 2 and explosion-proof class II G motor requires 6" tall transition or stub adaptor to provide motor clearance.
- ⑩ Filters equipped with 10x8 heavy duty airlock have 8" square discharge with 4" tall transition to match 10x8 airlock. Transition height is reflected in reduced clearance below airlock.
- ⑪ Optional structural steel legs include mount pads. When structural steel legs are not specified, then mount pads become optional as a separate item.
- ⑫ Larger dimensions used only when 12x10 or 12x12 airlocks with drive are required.

CLEARANCE BELOW AIRLOCK ⑧					
DISCHARGE	7"	6 3/4"	8"	8"	12"
MODEL	12x10	7x7	10x8	9x9	12x12
AVS 9	9 3/8	16 3/8	9 3/4	14 3/8	13 5/8
AVS16	10	17	10 3/8	15	14 1/4
AVS36	11 3/8	18 3/8	11 5/8	16 1/4	15 1/2
AVS64	12 5/8	19 5/8	12 7/8	17 1/2	16 3/4

MODEL	HOPPER HEIGHT (Z-Z)									
	STD.	DISCHARGE "H"								
	7	6 3/4	8	8	9	10	12	14	15	16
AVS 9	16 3/4	17	15 7/8	15 7/8	15	14 1/8	12 3/8	10 3/4	9 3/4	9
AVS16	24 1/8	24 3/8	23 1/4	23 1/4	22 3/8	21 1/2	19 3/4	18	17 1/4	16 1/4
AVS25	31 1/2	31 5/8	30 5/8	30 5/8	29 3/4	28 7/8	27 1/8	25 3/8	24 1/2	23 3/4
AVS36	38 3/4	39	38	38	37 1/8	36 1/4	34 1/2	32 3/4	31 7/8	31
AVS64	53 1/2	53 3/4	52 3/4	52 3/4	51 3/4	51	49 1/4	47 1/2	46 5/8	45 3/4

MODEL	CL'TH AREA	A	B	C	D	E	F	G	J	K	MAX A/L	SCFM	INLET
18AVS 9	22		76 11/16	34 3/16	22	15	10"						
36AVS 9	44	26	94 11/16	52 3/16	40	38	10"	40		21 3/4	12x12	3.6	6"
54AVS 9	67		112 11/16	70 3/16	58	38	10"	50					8"
72AVS 9	89		130 11/16	88 3/16	76	38	10"						
18AVS16	39		84 11/16	34 3/16	22	15	10"	39 1/2					6"
36AVS16	78	34 1/2	102 11/16	52 3/16	40	38	10"	50		29 1/4	12x12	5.0	8"
54AVS16	119		120 11/16	70 3/16	58	46	10"						10"
72AVS16	159		138 11/16	88 3/16	76	38	10"						
96AVS16	209		162 11/16	112 3/16	100	48	10"	49 1/2					
18AVS25	62		92 11/16	34 3/16	22	15	10"						6"
36AVS25	124	43	110 11/16	52 3/16	40	22	10"						8"
54AVS25	186		128 11/16	70 3/16	58	54	10"	48		36 1/2	12x12	5.8	
72AVS25	245		146 11/16	88 3/16	76	38	20						10"
96AVS25	332		170 11/16	112 3/16	100	48							
36AVS36	179	51 1/2	118 11/16	52 3/16	40	22	10"						
54AVS36	269		136 11/16	70 3/16	58	62	10"	51 1/2	51 1/2	12x12	7.3		AS REQUIRED
72AVS36	358		154 11/16	88 3/16	76	38	20						
96AVS36	478		178 11/16	112 3/16	100	48							
36AVS64	318	68 1/2	134 11/16	52 3/16	40	22	10"						
54AVS64	478		152 11/16	70 3/16	58	30	10"	68 1/2	68 1/2	15x15	10.9		
72AVS64	636		170 11/16	88 3/16	76	38	36						
96AVS64	850		194 11/16	112 3/16	100	48							



FLOW DIAGRAM OF PROCESS
 JACKSONVILLE KRAFT PAPER COMPANY, INC.
 JACKSONVILLE, FLORIDA

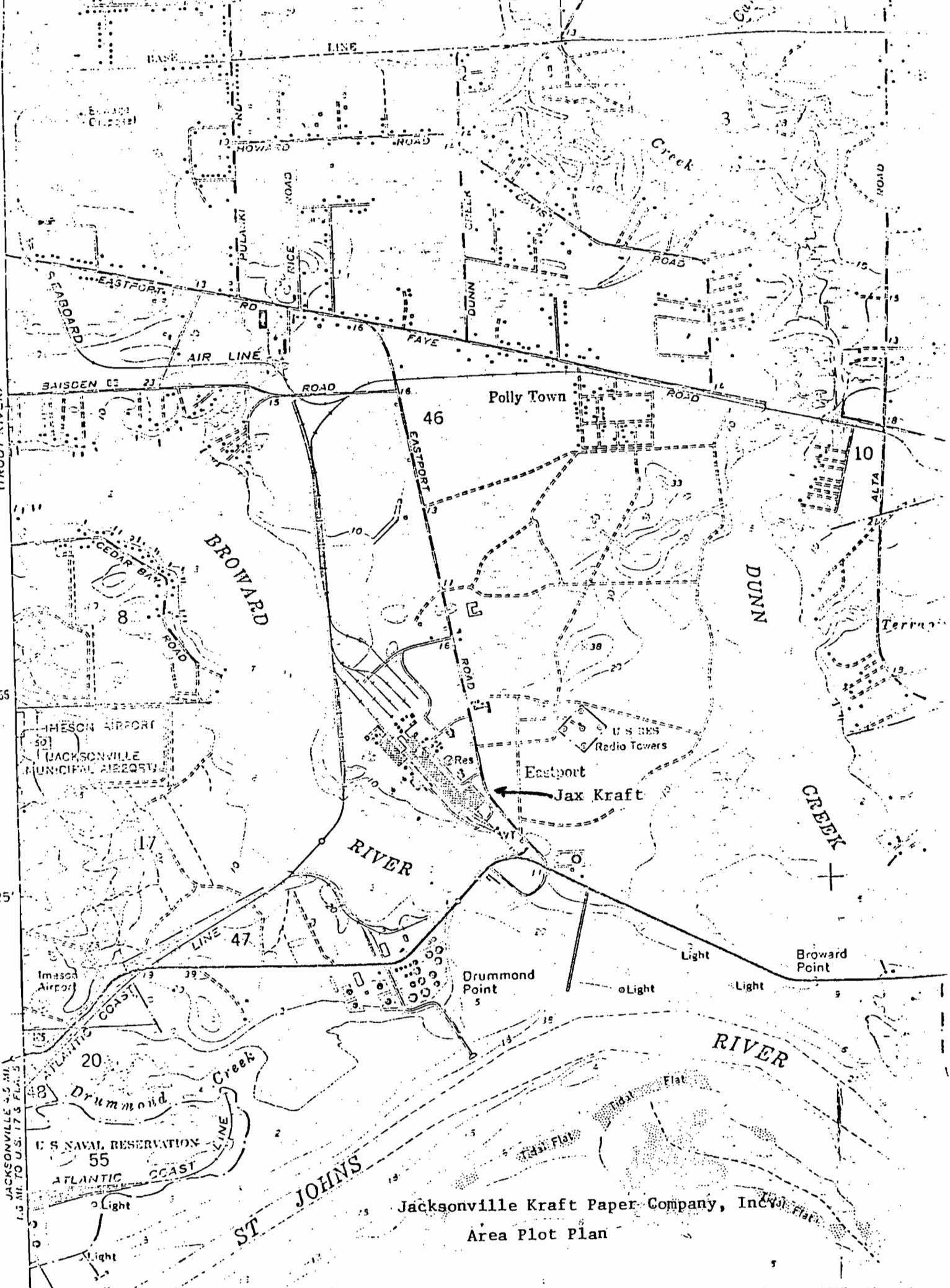
T. I. S.

4644 1 NW
(TROUT RIVER)

3255

25'

JACKSONVILLE 4.5 MI.
1.3 MI. TO U.S. 17 & FLA. 5



Jacksonville Kraft Paper Company, Inc.
Area Plot Plan

**DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES**
Bio-Environmental Services Division
Air and Water Pollution Control



October 29, 1985

Mr. Clair Fancy, P. E.
Central Air Permitting Section
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Re: Jacksonville Kraft Paper Co.
Petroleum Coke Handling System

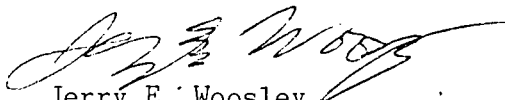
Dear Mr. Fancy:

Bio-Environmental Services Division provides the following additional comments concerning the captioned item:

1. Specific condition No. 6 line 6 Department's District should be replaced with Bio-Environmental Services Division.
2. The maximum allowable emission rate (particulate matter) should be stated in the permit i.e. 0.08 lbs/hr and 0.04 T/yr.

Your consideration of the above is requested.

Very truly yours,


Jerry E. Woosley
Associate Engineer

JEW/ecr

cc: Mr. Mort Benjamin, DER
BESD File 1735Y



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

July 18, 1985

Mr. Jerry Woosley
Duval County Department of
Health, Welfare & Bio-
Environmental Services
515 West 6th Street
Jacksonville, Florida 32206

Re: Jacksonville Kraft Paper Company
Lime 1, 2, & 3


Dear Mr. Woosley:

In our discussions with the Company's representatives in Tallahassee, agreement was reached that the test burn requested could be authorized by amendment to their appropriate operating permits. At that time it was understood that the vendor would supply temporary equipment for handling petroleum coke. The basic ground rule was that burn parameters would be limited to no increase in emissions over the currently permitted levels.

We agree that any permitted increase would be appropriately handled through a construction permit for a modification. Since we are dealing with a major facility the increase, even though less than the significance level, would be a contemporaneous increase, and the construction permit would serve to document in a federally enforceable manner.

If you have any questions please write to me or call Bill Thomas at (904)488-1344.

Sincerely,


C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/BT/s

cc: John Brown

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.
 2. Restricted Delivery.

3. Article Addressed to:
 Mr. R. G. Carovano
 Jacksonville Kraft Paper Co.
 Post Office Box 18019
 Jacksonville, FL 32229

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 408 533 625

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
 X

6. Signature - Agent
 X *BAOM*

7. Date of Delivery
 OCT 18 1985
 10-15-85

8. Addressee's Address (ONLY if requested and fee paid)
 R E R

DOMESTIC RETURN RECEIPT

P 408 533 625
 RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL.
 (See Reverse)

Sent to Mr. R. G. Carovano	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 10/11/85	

PS Form 3800, Feb. 1982

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

October 10, 1985

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. R. G. Carovano
Executive Vice President
Jacksonville Kraft Paper Company, Inc.
Post Office Box 18019
Jacksonville, Florida 32229

Dear Mr. Carovano:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit to construct a petroleum coke handling and storage system.

Before final action can be taken on your draft permit, you are required by Florida Administrative Code Rule 17-103.150 to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Duval County no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice may be grounds for denial of the permit.

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy
for C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Attachments

cc: Johnny Cole
Jerry Woosley

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action
on Permit Application

The Department of Environmental Regulation gives notice of its intent to issue a permit to Jacksonville Kraft Paper Company, Inc., that will authorize the construction of a petroleum coke handling and storage system. The system will be located at the company's kraft pulp mill on 9469 Eastport Road in Jacksonville, Duval County, Florida.

The system will handle up to 20 TPH petroleum coke which will be used as an supplementary fuel in the existing process equipment. The emissions from the coke handling and storage system will be less than 1 TPY. The emissions from this system will not cause an increase in the ambient air concentration of particulate matter at ground level above the de minimus level. A best available control technology determination was not required for the proposed system.

Persons 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 conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period constitutes a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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:

Dept. of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Duval County Dept. of Health, Welfare
and Bio-Environmental Service
515 West 6th Street
Jacksonville, Florida 32206

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of an)
Application for Permit by:)
)
Jacksonville Kraft Paper Co.,) DER File No. AC 16-108739
Inc.)
P. O. Box 18019)
Jacksonville, Florida 32229)
)

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its Intent to Issue, and proposed order of issuance for, a permit pursuant to Chapter 403, Florida Statutes, for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Jacksonville Kraft Paper Company, Inc., applied on August 23, 1985, to the Department of Environmental Regulation for a permit to construct a petroleum coke handling and storage system at its existing kraft pulp mill located at 9469 Eastpoint Road, Jacksonville, Duval County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The applicant was officially notified by the Department that an air construction permit was required for the proposed work.

This intent to issue shall be placed before the Secretary for final action unless an appropriate petition for a hearing pursuant to the provisions of Section 120.57, Florida Statutes, is filed within fourteen (14) days from receipt of this letter or

publication of the public notice (copy attached) required pursuant to Rule 17-103.150, Florida Administrative Code, whichever occurs first. The petition must comply with the requirements of Section 17-103.155 and Rule 28-5.201, Florida Administrative Code (copy attached), and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32301.

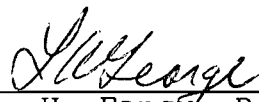
Petitions which are not filed in accordance with the above provisions are subject to dismissal by the Department. In the event a formal hearing is conducted pursuant to Section 120.57(1), all parties shall have an opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witnesses and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exceptions to any order or hearing officer's recommended order, and to be represented by counsel. If an informal hearing is requested, the agency, in accordance with its rules of procedure, will provide affected persons or parties or their counsel an opportunity, at a convenient time and place, to present to the agency or hearing officer, written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition, may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of

Administrative Hearings, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

Executed the 10th day of October, 1985, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

for 
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:

Mr. R. G. Carovano
Mr. Johnny Cole
Mr. Jerry Woosley

CERTIFICATION

This is to certify that the foregoing Intent to Issue and all copies were mailed before the close of business on Oct. 11, 1985.

J. W. George
for C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby acknow-
ledged.

Patricia G. Adams October 11, 1985
Clerk Date

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

Technical Evaluation
and
Preliminary Determination

Jacksonville Kraft Paper Company, Inc
Jacksonville, Florida
Duval County

Petroleum Coke Handling and Storage System
File No: AC16-108739

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

October 10, 1985

I. Applicant

A. Jacksonville Kraft Paper Company, Inc.
Post Office Box 18019
Jacksonville, Florida 32229

B. Request

Mr. R. G. Carovano, Executive Vice President, submitted an application for permit to construct a petroleum coke handling and storage system at their kraft pulp mill (SIC 2611) which was dated August 20, 1985. The application was considered complete when received by the Department on August 23, 1985.

C. Project and Location

Jacksonville Kraft Paper Company proposes to construct a petroleum coke handling and storage system manufactured by REDICOKE Equipment Supply at their kraft pulp mill that is located at 9469 Eastport Road in Jacksonville, Duval County, Florida. The UTM coordinates on the site are zone 17, 441.8 km E and 3365.6 km N.

The petroleum coke handling and storage system consists of a pneumatic truck unloading system, a 14 foot diameter by 80 foot high storage silo equipped with a MAC model 72 AVS 25 fabric filter, a screw conveyor to transfer the coke from the silo to a rotary valve, and a pneumatic transport system to carry the coke to the existing lime kilns.

D. Air Pollutant Emissions

The only emissions from the petroleum coke handling and storage system will be particulate matter from the fabric filter on the storage silo. The 450 CFM at 15 psig air used to convey the coke from the truck to the silo is filtered by the fabric filter before being discharged to the atmosphere through a 10 inch by 20 inch stack that is 85 feet above ground. The fabric filter will reduce the particulate matter concentration to 0.02 gr/CF. At this concentration, there will be no visible emissions from the system.

This determination does not evaluate or authorize the use of the petroleum coke in any process equipment. The combustion of the coke in the lime kilns, as planned by the applicant, will require a separate evaluation and, if it causes an increase in emissions, construction permits for the equipment burning the coke.

II. Rule Applicability

The proposed project, construction of a petroleum coke handling and storage system, is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code.

The project will be located in an area designated attainment for particulate matter (Rule 17-2.420, FAC) but in the area of influence of the Duval County particulate matter nonattainment area (17-2.410(2)), in an unclassified area for sulfur dioxide (17-2.430), in a nonattainment area for ozone (17-2.410), and in an attainment area for nitrogen oxides and carbon monoxide (17-2.420).

Kraft pulp mills are listed in Table 500-1, Major Facility Categories (list of 28). The plant is a major facility (17-2.100) because emissions of particulate matter, sulfur dioxide, carbon monoxide, nitrogen oxides, and volatile organic compounds exceed 100 TPY of each criteria pollutant. However, the increase in emissions resulting from the proposed project are less than the significant emission rates listed in Table 500-2, Regulated Air Pollutants - Significant Emission Rates.

This project is not subject to the prevention of significant deterioration regulations (17-2.500) and new source review for nonattainment areas (17-2.510) because the modification does not result in a significant emission increase of any criteria pollutant (17-2.500(2)(d)4.a(ii) and the increase in particulate matter emissions will not have a significant impact on the Duval County particulate matter nonattainment area. It also is not a source of volatile organic compounds.

The project will be reviewed under Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements. Emission standards will be established under the authority of Rule 17-2.610(3), Unconfined Emissions of Particulate Matter, which require that reasonable precautions be used to prevent unconfined emissions of particulate matter.

III. Technical Evaluation

Regulations require reasonable precautions be used for handling and storage of the petroleum coke to minimize fugitive particulate matter emissions.

The applicant proposes to unload the coke by a pneumatic conveyor, store it in an enclosed silo, and transfer it from the silo by an enclosed screw conveyor to another pneumatic conveyor that carries the coke to the process equipment. The air transporting the coke from the truck to the silo is filtered before being discharged to the atmosphere. The air that becomes

contaminated when the coke is transferred from the silo to the process equipment will have to be cleaned before being discharged by that system. The Company's plans are to use the coke as fuel in the lime kilns in which case the air will pass through scrubber before being exhausted to the atmosphere. The use of the coke in the kilns will require a separate evaluation by the Department. The data submitted by the Company implies that the coke can be burned in the kilns in compliance with the regulations although the Company may have to obtain permits to modify the kilns to comply with the regulations. The Department may grant the Company permission to make an extensive test burn of coke in the kilns to obtain data that could be required in the applications for a permits to construct.

IV. Air Quality Impact

Screening modeling shows the maximum 24-hour ambient air impact of the particulate matter from the petroleum coke handling and storage system will be 1.2 ug/m³. This is below the de minimus ambient impact listed in Table 500-3. Thus, the increased emissions from the proposed system will not causes an increase in the ambient air concentration of particulate matter at ground-level above the de minimus level.

V. Conclusion

Based on the data submitted by Jacksonville Kraft Paper Company, Inc., the Department has concluded that the proposed petroleum coke handling and storage system can be built and operated in compliance with the state's air pollution control regulations. The Department proposes to issue a construction permit that will authorize this project. The General and Specific Conditions in the proposed permit (draft attached) will assure compliance of the new source with the air pollution control regulations.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Jacksonville Kraft Paper Co.,
Inc.
P. O. Box 18019 County:
Jacksonville, Florida 32229

Permit Number: AC 16-108739
Expiration Date: December 31, 1986
County: Duval
Latitude/Longitude: 30° 25' 15"N/
81° 36' 00" W
Project: Petroleum Coke Handling
and Storage System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the construction of a REDICOKE petroleum coke handling and storage system consisting of a pneumatic truck unloading system that uses 450 ACFM at 15 psig of air to transfer 20 TPH of petroleum coke to a 14 foot diameter by 80 foot high storage silo. The silo is equipped with a MAC model 72 AVS 25 fabric filter. An enclosed screw conveyor is used to transfer the coke from the silo to a rotary valve, and two pneumatic transport systems that take 250 CFM of air each are used to transport up to 2.2 TPH of coke to existing process equipment (lime kiln). This permit does not authorize the combustion of the petroleum coke in the No. 3 lime kiln or other process equipment. This system will be located at the existing kraft pulp mill at 9469 Eastport Road, Jacksonville, Duval Co., Florida. The UTM coordinates of this site are zone, 17, 441.8 km E and 3365.6 km N.

The modifications shall be in accordance with the plans and schedule submitted by the permittee and attached to the permit except for the changes mentioned in the Technical Evaluation and Preliminary Determination.

Attachments are as follows:

1. Application dated August 20, 1985.

PERMITTEE:
Jacksonville Kraft Paper Co.,
Inc.

Permit Number: AC 16-108739
Expiration Date: December 31, 1986

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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 acknowledgement 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.

PERMITTEE:
Jacksonville Kraft Paper Co.,
Inc.

Permit Number: AC 16-108739
Expiration Date: December 31, 1986

GENERAL CONDITIONS:

6. The permittee shall at all times 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.

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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Jacksonville Kraft Paper Co.,
Inc.

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GENERAL CONDITIONS:

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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD).
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

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GENERAL CONDITIONS:

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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 submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The petroleum coke handling and storage system shall not handle more than 20 TPH of coke and the conveyor equipment shall not operate more than 1,000 hours per year without prior approval by the Department.
2. Petroleum coke shall not be transferred to the silo unless the fabric filter is operating properly.
3. All covers and openings in the material handling and storage system shall remain sealed during its operation. Any leak in the pneumatic system that allows particulate matter to escape to the atmosphere shall be repaired promptly.

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Inc.

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SPECIFIC CONDITIONS:

4. Visible emissions from the fabric filter or any other components of the petroleum coke handling and storage system as determined by EPA Method 9 described in 40 CFR 60, Appendix A, shall not exceed 5 percent opacity, 6 minute average.

5. If the permittee is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit (Rule 17-4.09 Florida Administrative Code).

6. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to the Department's District office within 45 days of start up or 90 days prior to the expiration date of the construction permit, whichever occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rule 17-4.22 and 17-4.23 Florida Administrative Code).

7. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4.10, Florida Administrative Code)

8. Upon obtaining a permit to operate, the permittee will be required to make periodic compliance tests and to submit annual operation reports to the Division of Bio-Environmental Services.

Issued this _____ day of _____
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.