

DEPARTMENT OF REGULATORY & ENVIRONMENTAL SERVICES
Air Quality Division

Patty
For [unclear] 4/24/93



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APR 21 1993

DIVISION OF
Resources Management

April 16, 1993

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

**RE: Seminole Kraft Corporation
Three (3) Gas Fired Boilers
Permit AC16-222359 PSD-FL-198**

Dear Mr. Lewis:

The Air Quality Division (AQD) has received the above referenced permit and offers the following comments for consideration.

The permit draft has established allowable emissions limits for each individual boiler, but Specific Condition 8., which describes testing requirements for demonstration of compliance does not clearly define how compliance will be demonstrated.

Specific Condition 8. Before this construction permit expires, the common packaged boiler stack shall be tested and monitored for compliance with the emission limits in Specific Condition Nos. 4, 5, and 6. Compliance tests for NO_x shall be conducted in accordance with 40 CFR 60.46b(e)(3). Compliance with SO₂ limits shall be in accordance with 40 CFR 60.49b(r). Compliance with visible emission limits shall be demonstrated initially and annually in accordance with EPA Method 9.

AQD questions the intent of the underlined portion of Specific Condition 8. The condition as it currently reads implies that the common stack is to be tested for each pollutant regulated. Previous conditions limiting regulated pollutants do not state any aggregate or total emission limits. For demonstration of compliance, each boiler should be required to demonstrate that the allowable emission limits can be achieved on an individual basis.

AQD suggests that Specific Condition 8. delete the language "the common packaged boiler stack" and replace it with "each packaged boiler", to clearly indicate that each boiler should be tested individually. AQD does not recommend simultaneous testing of the three packaged boilers for any pollutant other than visible emissions.

Please address any questions or comments to me at (904) 630-3666.

Very truly yours,

Ronald L. Roberson
Ronald L. Roberson
Associate Engineer

cc: AQD Permitting File
Mr. Wayne Walker - AQD
421 West Church Street - Suite 412
Jacksonville, Florida 32202-4111



*cc: J. Reynolds
B. Mitchell
C. Halladay
E. Bailey, NED
G. Harper, EPA
D. Bunyak, NPS
R. Colton, GDAIR*

Area Code 904/630-3666

Bruce

~~CHH~~
SB
PL } FYI

I N T E R O F F I C E M E M O R A N D U M

Date: 19-Apr-1993 08:38am EST
From: Dea Wahlen TAL
WAHLEN_D
Dept: Office General Counsel
Tel No: (904)488-9730
SUNCOM: 278-9730

TO: Ernie Frey JAX
TO: Patty Adams TAL

(FREY_E)
(ADAMS_P)

Subject: Seminole Kraft Corporation

On April 15, 1993, we received a motion for extension of time from Terry Cole, counsel, concerning AC16-222359, Seminole Kraft Corporation, referencing the Notice of Intent dated March 31, 1993.

Bull
FYI

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04/15/1993

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of an
application for Permit by:

DER File No. AC16-222359
PSD-FL-198

OGC File No. _____

Seminole Kraft Corporation,
9469 East Port Road
Jacksonville, FL 32229

MOTION FOR EXTENSION OF TIME TO FILE
PETITION FOR FORMAL ADMINISTRATIVE HEARING

SEMINOLE KRAFT CORPORATION, by and through the undersigned attorney, and pursuant to Rule 17-103.070, F.A.C., hereby requests an extension of time for filing its Petition for Formal Administrative Proceedings, and states as follows:

1. Seminole Kraft has pending before the Department of Environmental Regulation an application for prevention of significant deterioration permit to construct and operate three steam boilers at its recycled papermaking facility in Jacksonville, Florida.

2. On April 2, 1993, Seminole Kraft received an Intent to Issue the above-referenced permits, dated March 31, 1993. Any petition for administrative proceedings in this matter must be filed within fourteen (14) days of receipt of the Notice of Intent to Issue, or April 16, 1993.

3. Subsequent to receipt of the above-referenced Notice of Intent, the parties in a related case concerning the Cedar Bay Cogeneration power plant have entered into a Stipulated Settlement Agreement resolving most of the issues Seminole Kraft

had identified regarding the above-referenced Intent to Issue Permit.

4. On April 14, 1993, the undersigned attorney and a representative of Seminole Kraft met with DER staff responsible for review and issuance of the above-referenced permit. It appears that all issues have been resolved regarding issuance of the permit. However, the Department may be unable to issue a revised Notice of Intent, technical evaluation, and preliminary determination prior to expiration of Seminole Kraft's point of entry to administrative proceedings.

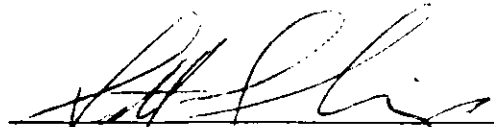
5. The undersigned attorney believes that an additional fourteen (14) days up to and including Friday, April 30, 1993, would be time sufficient to allow the Department to issue its revised evaluation and permit and allow Seminole Kraft time to review the same.

6. On April 14, 1993, the undersigned attorney informed Assistant General Counsel Richard Donelan, currently acting as attorney on the Department's behalf in this matter, that this request for extension of time would be filed. Mr. Donelan acknowledged that such an extension might be necessary and did not register any objection.

WHEREFORE, Seminole Kraft Corporation respectfully requests that the Department enter an order extending the time for filing any petition for formal administrative proceedings in this matter by an additional fourteen (14) days or up to and including April 30, 1993.

Respectfully submitted,

OERTEL, HOFFMAN, FERNANDEZ &
COLE, P.A.
2700 Blair Stone Road, Suite C
Post Office Box 6507
Tallahassee, Florida 32314-6507
(904) 877-0099



TERRY COLE
Florida Bar ID #133550
SCOTT SHIRLEY
Florida Bar ID #547158

Attorneys for SEMINOLE KRAFT CORPORATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by hand delivery this 15th day of April, 1993 to Richard Donelan, Esquire, 2600 Blair Stone Road, Tallahassee, Florida 32399; and Clair Fancy, Air Division, Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399.



Attorney

SS:cjb/1003-23.ext

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APR 15 1993

Division of Air
Resources Management

Meeting of Seminole Craft Co. @ 11:30-12:30 4-14-93

@ BAR

.. Scott Shirley .. - OHF&C

.. Craig Hurd .. - Stern Container Corp., Atlanta, Ga.

.. Clair Fany .. - FOER/DARM/BAR

.. Richard Dowling - FOER/DGC

.. Bruce Mitchell - FOER/DARM/BAR

I N T E R O F F I C E M E M O R A N D U M

Date: 09-Apr-1993 02:01pm EST
From: Sue Sullivan TAL
SULLIVAN S
Dept: Office of Secretary
Tel No: 904/487-0472
SUNCOM:

TO: Clair Fancy TAL
TO: Bruce Mitchell TAL

(FANCY_C)
(MITCHELL_B)

Subject: Cedar Bay SK conditions

Richard Donelan has gotten a tentative agreement with Seminole Kraft to accept this condition. Richard wants us to wait until he has the final sign off before we change the Conditions of Certification or the SK Permit.

Buck

D. Contemporaneous Emission Reductions

This certification and any individual air permits issued subsequent to the final order of the Board certifying the power plant site under 403.509, F.S., shall require, that the following Seminole Kraft Corporation sources be permanently shut down and made incapable of operation, and shall turn in their operation permits to the Division of Air Resources Management's Bureau of Air Regulation, within 30 days of written confirmation by DEP of the successful completion of the initial compliance tests on the CBCP boilers: the No. 1 PB (power boiler), the No. 2 PB, the No. 3 PB, the No. 1 BB (bark boiler), and the No. 2 BB. RESD shall be specifically informed in writing within thirty days after each individual shut down of the above referenced equipment. Within one year of surrender of operating permits as provided above, SK shall take the following steps to ensure compliance with this condition:

Remove all oil guns
Remove motors and selected conveyor parts in wood feed system for bark boilers
Dismantle stacks
Remove boiler feedwater pumps
Sever fuel line connections
Remove fan motors

These sources shall not, under any circumstances, be restarted, refurbished or re-permitted as new or existing sources, at the SK or CBCP site.

This requirement shall operate as a joint and individual requirement to assure common control for purpose of ensuring that all commitments relied on are in fact fulfilled.

E. SK Steam Boiler Emissions

This certification and any individual air permits issued by the Department subsequent to the final order of the Board certifying the power plant site under Section 403.509, Florida Statutes, shall incorporate the following limitations on the total tonnage of the specified criteria pollutants allowed to be emitted annually by any natural gas-fired boiler or combination of boilers constructed and operated by SK to provide up to 375,000 lbs/hor of steam for use in its recycled paper process:

Tons Per Year

CO	553
NO _x	310
SO ₂	<u>25, except as provided below</u>

In the event that the ceiling for SO₂ is expected to be exceeded due to factors beyond the control of SK, SK may notify the Department that it must exceed the ceiling as provided herein, and

emissions of SO₂ during the period of force majeure curtailment shall not be counted against the yearly emissions ceiling of 25 tons, except that in no event shall the annual emissions of SO₂ from the steam boilers referenced above exceed a ceiling of 41 tons per year. The notice shall include a statement or reasons for the request and supporting documentation. The filing of the notice at least 30 days prior to the date of exceedance, shall preclude any finding of violation for such exceedance by DEP until final disposition of any administrative proceedings thereon.