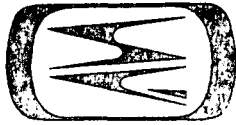


Auball # 840556091

gav. fl



JEFFERSON SMURFIT CORPORATION

401 ALTON STREET, P.O. BOX 276

ALTON, ILLINOIS 62002-2276

618/463-6000

FEDERAL EXPRESS

June 13, 1988

Mr. William A. Thomas, P.E.
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2600

SUBJECT: Proposed Construction Permits
No. 9 Recovery Boiler AC16-141868
No. 9 Smelt Dissolving Tank AC-16-141870

Reply to: **Containerboard Mill Division**

1915 WIGMORE STREET

P.O. BOX 150

JACKSONVILLE, FL 32201

TELEPHONE: 904/353-3611

RECEIVED

JUN 14 1988

DER-BAQM

0310067

Dear Mr. Thomas:

The purpose of this letter is to confirm our understanding of agreements developed in the meeting of yourself, Mr. Mitchell and Mr. Raval for the Department; and Mr. Tonn and Mr. Millican for Jefferson Smurfit Corporation on June 2, 1988.

We appreciate your cooperation and the opportunity to discuss with you the final conditions of the subject permits.

As discussed with you, JSC considers it appropriate to request an extension of time for filing a petition for administrative proceedings to allow the Company additional time to seek resolution of certain conditions in the proposed construction permits. With no objection from the Department, a motion for extension of sixty (60) days was submitted to the Department on June 3, 1988, by Oertel & Hoffman, P.A., Attorneys for the Company.

Technical Evaluation and Preliminary Determination

On page 2, second paragraph, JSC has noted that the description of the scrubber to be installed on the smelt dissolving tank vent has been revised to reflect selection of a scrubber of a different design. The revised description was submitted in Attachment 3 of the Company's submittal of additional information on April 14, 1988. While we understand that the existing description in the Technical Evaluation and Preliminary Determination will not be revised, the description as found in the proposed permit will be revised by the Department where appropriate.

On page 3, last paragraph, JSC has noted that the citing for a visible emission standard for the No. 9 Recovery Boiler is in error and is correctly cited in Chapter 17-2.600(4)(a)1 FAC.

On page 5, Table 2, the maximum allowable limit for TRS from the No. 9 Recovery Boiler is exhibited as 20.4 lbs./hr. The Company believes that because the emission standard is based on a 12 hour average, the maximum mass emission rate should also be based on a 12 hour average. A maximum

mass emission rate based on a 1 hour period could be exceeded without having exceeded the maximum allowable emission standard based on a 12 hour average, creating a more stringent limit than the standard provided in Chapter 17-2.600(4)(c)3.a.(i) FAC. While the Department does not agree with the Company's position, JSC does object to the maximum mass TRS emission rate based on a 1 hour period and will seek resolution to this issue by its request in Specific Condition 5 a) below.

On page 5, Table 2, the VE limit exhibited for the No. 9 Recovery Boiler is in error and is to be changed by the Department to: "45% opacity or less."

Proposed Permit - No. 9 Recovery Boiler

On each page of the proposed permit, the Department has agreed to extend the expiration date from September 24, 1989 to December 31, 1989.

Specific Condition 3 - The Department has agreed to delete the requirement of this specific condition.

Specific Condition 4 - The Department has agreed to delete "1046 gals./hr." This specific condition will provide a fuel oil rate based only on heat input or "157 MMBTU/hr."

Specific Condition 5 - a) The Company has stated its objection to a mass TRS emission rate based on a 1 hour period. It is therefore requested that the mass emission limits of this condition be qualified as follows:

From: a) TRS: 17.5 ppmvd @ standard conditions, 8%O₂, 12-hour average (20.4 lbs./hr., 89.4 TP4).

To: a) TRS: 17.5 ppmvd @ standard conditions, 8%O₂, 12-hour average.
For testing purposes TRS emissions shall not exceed 20.4 lbs./hr.
For PSD purposes TRS emissions shall not exceed 89.4 TP4.

c) The Department has agreed to revise the VE emission limit from "less than 20% opacity" to "not greater than 45% opacity."

Specific Condition 7 - The Department has agreed to revise the last sentence from "Other EPA approved test methods may be used only after prior Departmental approval." to: "Other EPA approved test methods may be used only if previously approved by the Department for this type of source."

Specific Condition 16 - The Department has agreed to revise the second paragraph of this specific condition from: "..., then all activities at the project must cease. (FAC Rule 17-4)" to: "..., then all activities at the project must cease pursuant to FAC Rule 17-4."

Specific Condition 17 - The Department has agreed to add the phrase, "pursuant to 40 CFR Appendix A." following "... and the BESD office."

Specific Condition 18 - The Department has agreed to delete the provisions of this specific condition and substitute language which will require that all existing permits for this source be surrendered to the Department on May 12, 1989.

Mr. William Thomas, P.E.
Bureau of Air Quality Management
Department of Environmental Regulation
Page Three

Proposed Permit - No. 9 Smelt Dissolving Tank

On each page of the proposed permit, the Department has agreed to extend the expiration date from September 24, 1989 to December 31, 1989.

Specific Condition 4 - The Department has agreed to correct an apparent typographical error of "16.2 lbs./hr." to "36.4 lbs./hr."

Specific Condition 5 & 7 - After a discussion of visible emission limits for saturated plumes, the Company understands that if data is furnished the Department to demonstrate saturated conditions in the source emission, the VE determination may be established as an indicator to request a particulate emission determination, or surrogate parameters may be established to replace a VE requirement. The Company intends to pursue this approach.

Specific Condition 9 - The Department has agreed to revise this condition to read: "Other EPA approved test methods may be used only if previously approved by the Department for this type of source."

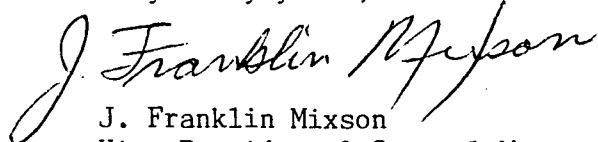
Specific Condition 15 - The Department has agreed to revise the second paragraph of this specific condition from: "..., then all activities at the project must cease. (FAC Rule 17-4)" to: "..., then all activities at the project must cease pursuant to FAC Rule 17-4."

Specific Condition 16 - The Department has agreed to add the phrase, "..., pursuant to 40 CFR Appendix A." following "... and the BESD office."

We sincerely appreciate the cooperation of you and your staff.

If you have any questions concerning these proposed permits, please call Mr. Gene Tonn at (904)-353-3611, Extension 287 or write to me at the above address.

Very truly yours,



J. Franklin Mixson
Vice President & General Manager

JFM/bem

cc: Khurshid Mehta, P.E., BESD
Bruce Mitchell 6-14-88 ASL
CHF/ST