Florida Department of Environmental Regulation
Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400
Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

September 8, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. L. A. Stanley
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Stanley:

Re: Seminole Kraft Recovery Boiler Project
AC 16-168607, -168608, -168609, PSD-FL-141

The Department has reviewed your application package dated August 10, 1989, and deemed it incomplete. Please submit the following information including all assumptions, calculations and reference material:

1. Please list all the contemporaneous emission changes at the Seminole Kraft facility, i.e., increases or decreases in emissions since September 1984.

2. What will be the net (before and after) SO_2 and TRS emission changes from the lime kilns as a result of the installation of the new set of multiple effect evaporators?

3. Please explain the differences in emission estimates for the recovery boiler submitted by Seminole Kraft and AES.

4. The net mass emission decreases from the Seminole Kraft Recovery Boiler project will not be creditable towards future projects, in accordance with the provisions of Rule 17-2.500 of the Florida Administrative Code. If you intend to apply those emission decreases to the AES project, then correspondingly you have to apply BACT to all the applicable pollutants for the sources which emit those pollutants, as done in the AES application package (BACT for CO, NOx, SO_2, Pb, Hg, Be, and Fluorides).

5. Please address the issues raised by EPA in the letter dated August 28, 1989 (copy attached).

If you have any questions, please call Pradeep Raval (permitting), Barry Andrews (BACT), or Max Linn (modeling) at (904)488-1344 or write to me at the above address.

Sincerely,

for W. Thomas

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

CHF/PR/t

cc: H. Oven, DARM
M. Benjamin, NE District
J. Manning, BESD
W. Aronson, EPA
C. Shaver, NPS
D. Buff, P.E.
C. Barton, SKC
J. Subramani, Oertel & Hoffman
T. Cole, Oertel & Hoffman
J. Blunden, AES
D. Schultz, P.E., Black & Veatch
S. Day, Black & Veatch

attachments

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

APT/AIR-ACS

Aug 29 '89

Ms. Patty Adams, Planner
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Seminole Kraft Corporation Kraft Recovery Boiler (PSD-FL-141)

Dear Ms. Adams:

We have reviewed the above application submitted to us in your August 14, 1989, letter. As discussed with Pradeep Raval of DER on August 22, 1989, we have the following comments to offer:

1. The determination of best available control technology (BACT) performed on the proposed recovery boiler for oxides of nitrogen (NO_x) did not give adequate consideration to more stringent emission limits. The applicant's rejection of lower NO_x emission limits was based on an apparent lack of vendor guarantees for the lower emission limits. This is an unacceptable argument for BACT purposes. The following sources have been found to have more stringent NO_x emission limits than proposed by Seminole Kraft:

Source	Location	*NO_x Limit
Willamette Ind.	Bennettsville, SC	150 ppm
Mead Coated Board	Cottonton, AL	112 ppm
Union Camp	Eastover, SC	150 ppm

*All limits corrected to 8% oxygen.

The applicant should be required to justify why the above emission limits are unachievable for their proposed recovery boiler.

2. Seminole Kraft has taken emission credit for particulate matter reductions from the replacement of a hydrator in 1988. The new hydrator allegedly has better particulate control and will result in a net decrease of 134.5 tons per year (TPY) for total particulate and 126.0 TPY for PM_{10}. In order to be creditable, this decrease must be federally enforceable at and after the time that actual construction on that particulate change occurred.

Since the permit for the new hydrator was not included in the PSD application, we have no way of verifying that the requirement for reducing uncontrolled particulate emission from the new hydrator by at least 95% is federally enforceable. A copy of said permit should be included in the preliminary determination, when issued.

3. Since netting was used to escape PSD for some pollutants, the applicant should confirm that no other contemporaneous increases/decreases have occurred other than those stated in the application.

4. It appears that the applicant has not performed an analysis of the National Ambient Air Quality Standards (NAAQS) for NO_x, including the contribution from nearby sources.

Your consideration of these comments is greatly appreciated. If you have any questions, please call Mark Armentrout of my staff at (404) 347-2864.

Sincerely,

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

cc: Seminole Kraft Corporation