



Seminole Kraft Corporation

Jacksonville Mill

9469 Eastport Road
P.O. Box 26998
Jacksonville, Florida 32218-0998

February 16, 1990

904 751-6400

Mr. C.H. Fancy, P.E.
Bureau of Air Regulation
Florida Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

This letter is to request an amendment to construction permit No. AC16-168607 (Kraft Recovery Boiler) for our mill in Jacksonville. As indicated earlier, Seminole Kraft has engaged in extensive engineering studies related to the proposed new recovery boiler installation as well as examining how best to position the mill for the future. These studies have concluded that the mill is a high cost operation in its current configuration and would remain so even after the installation of the new recovery boiler currently estimated to cost \$130,000,000.

Accordingly, three months ago, Seminole Kraft began an investigation to determine what technology alternatives to the recovery boiler project might provide an improved environment to the City of Jacksonville and a mill that would be more competitive in domestic and foreign markets in the future.

An alternative has been tentatively selected that will provide the business with the stability required to insure a long term viable operation. This alternative provides for reconfiguration of the existing mill to enable it to use 100% recycled fiber instead of virgin fiber to produce 1,200 tons per day of linerboard on our existing No.2 paper machine. The kraft pulp mill, old recovery boilers and associated facilities will be permanently shut down and the No.1 paper machine will be placed on cold standby. This alternative will result in the elimination of all regulated TRS (odor) emission sources prior to the stated November 12, 1992 deadline as well as substantial reductions in particulate emissions. This conversion will increase the use of recycled fiber at the mill from about 100 TPD to about 1,400 TPD and will substantially increase Florida's waste paper recycle rate.

As we discussed, the best approach to providing regulatory approval of this alternative appears to be an amendment to the specific conditions in the new recovery boiler construction permit. We believe this new condition should relieve Seminole Kraft of the obligation of building a new recovery boiler if Seminole chooses to shut down the kraft pulping operation, old recovery boilers and related facilities by supplying recycled fiber to the paper machine instead of virgin wood pulp from the kraft pulp mill. In addition, this new condition would require Seminole Kraft to turn in the operating permits for the old recovery boilers once the recycle operation is up and running and to make the old recovery boiler incapable of operation. We believe this specific condition should also provide the mechanism for retaining the recovery boiler creditable emission reductions for potential use by Seminole Kraft pursuant to 17-2.500(2)(e) 3 & 4. As noted, our No.1 paper machine (presently making bag paper) will be placed on cold standby for the time being. However we hope to develop a project to use recycle fiber on the No.1 paper machine in the future and if AES cannot supply the required steam, we would like to use the creditable emissions from the recovery boilers for a power boiler to supply steam to the No.1 paper machine.

Finally, this specific condition should provide for notice to DER of Seminole Kraft's final decision to pursue this alternative or proceed with the new recovery boiler by a date certain.

To facilitate development of the language for this amendment, we have prepared the draft specific condition shown below for your consideration.

15. Seminole Kraft Corporation has indicated to the Department that as an alternative to replacing the three existing kraft recovery boilers with a new recovery boiler, it may choose to convert the mill to a 100% recycle fiber operation and close down the kraft pulp mill, recovery boilers and associated facilities. In the event that Seminole Kraft chooses this alternative, the following conditions apply:

- a. The existing kraft pulp mill, including three recovery boilers, three smelt dissolving tanks, digester system, three lime kilns and three multiple effect evaporators, will be permanently shut down and be made incapable of operation by November 12, 1992. Operating permits for these sources shall be turned into the BESO office by this same date.

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- b. Notice of Seminole Kraft's decision to proceed with construction of a new recovery boiler or to convert the mill to 100% recycle fiber operation shall be provided to DER and BESD by May 1, 1990.
- c. If Seminole Kraft chooses to convert the mill to 100% recycle fiber operation, it shall submit semi-annual progress reports to DER and BESD by June 30 and December 31 of each year until the recycle fiber project is completed and in operation.
- d. If Seminole Kraft chooses to convert the mill to 100% recycle fiber operation and shuts down the kraft pulp mill sources listed in a. above, the following creditable emission reductions are available to Seminole Kraft for five (5) years from the date construction on this alternative is complete or November 12, 1992, whichever is earlier.

CREDITABLE EMISSION REDUCTIONS (TPY)
 (1983-84)*

<u>Source</u>	<u>TSP</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>NO_x</u>	<u>CO</u>	<u>TRS</u>
3 existing Recovery Boilers	427.2	320.5	1481	321.1	2327.2	89.3
3 Existing Smelt Dissolving Tanks	122.6	109.7	8.6	-	-	8.9
3 Existing Lime Kilns	74.1	72.6	1.4	98.1	21.2	17.3
No.1 & No.2 Lime Slaker (shut down in 1988)	140.5	133.0	-	-	-	-
No.3 Lime Slaker	14.0	12.8	-	-	-	-

*Note that emissions for the recovery boilers, smelt dissolving tanks, and lime slakers are the same as in the PSD construction permit application (see Attachment A). The emissions for the lime kilns are based on 1983-84 operating hours, but today's control technology/emission limits. See Attachment B for details.

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We hope this information will be adequate to proceed with processing the proposed amendment. Please let us know if you require any additional information. We would be happy to meet with the Department to help expedite the handling of this matter.

Sincerely,



L.A. Stanley
General Manager

ah

CC: Steve Smallwood
Dale Twachtmann
James L. Manning
Richard Maguire
Mike Riddle
Curt Barton
Al Koleff

P. Raval

B. Andrews

M. Finn

A. Katyma, NE Dist

St. Aronson, EPA

C. Staver, NPS

CAF/JRP/BT

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ATTACHMENT A

(Table 4-3 from Original Recovery Boiler PSD Application)

Table 4-3 Baseline Emissions (1983-1984) from Existing Recovery Boilers and Smelt Dissolving Tanks at Seminole Kraft

Pollutant	Annual Baseline Emissions (TPY)						Totals
	RB1	RB2	RB3	SDT1	SDT2	SDT3	
Particulate Matter (TSP)	143.8	144.4	139.0	31.3	46.4	42.9	549.8
Particulate Matter (PM10)	107.9	108.3	104.3	28.0	43.3	38.4	430.2
Sulfur Dioxide	429.5	519.8	531.7	2.5	3.0	3.1	1,489.6
Nitrogen Oxides	94.4	112.7	114.0	-	-	-	321.1
Carbon Monoxide	674.9	816.8	835.5	-	-	-	2,327.2
Volatile Organic Compounds	100.0	119.4	120.8	-	-	-	340.2
Total Reduced Sulfur	25.2	31.3	32.8	2.6	3.1	3.2	98.2
Lead	.012	0.13	0.12	-	-	-	0.37
Mercury	-	-	-	-	-	-	-
Beryllium	0.0090	0.0098	0.0090	-	-	-	0.0278
Sulfuric Acid Mist	6.18	6.76	6.19	-	-	-	19.1
Inorganic Arsenic	-	-	-	-	-	-	-
Fluorides	-	-	-	-	-	-	-
Asbestos	-	-	-	-	-	-	-
Vinyl Chloride	-	-	-	-	-	-	-

Note: TPY = tons per year

ATTACHMENT B

Basis for Lime Kiln Creditable Emissions

Particulate Emissions - actual data from 1983-84 Annual Report
 PM₁₀ - used AP-42 Table 10.1-4 and particulate emissions from
 1983-84 Annual Report.

NO_x used NCASI Technical Bulletin No. 107, April 1988

Kiln

No.	mmBTU/Year		Tons No _x /Year		Average
	83	84	83	84	
1	156150	89535	12.5	7.16	9.8
2	241883	322084	37.5	49.9	43.7
3	267245	308848	41.4	47.9	<u>44.6</u>
				Total	98.1

TRS emissions calculated from actual gas flow rates in 1983-84
 and at 20 ppm TRS as H₂S. This would correspond to permit limit
 today.

CO used AP-42 Table 10.1-1 (0.1 lbs/ADUP)

Year	Pulp Produced (Tons-ADUP/Year)	CO Emissions (TPY)
1983	410,238	20.5
1984	436,032	<u>21.8</u>
		Avg. 21.2

For SO₂-use data compiled in 1989's operating permit application.

Kiln	SO ₂ Emission Rate	Avg. Hours of Operation	SO ₂ (TPY)
No.1	0.16 lb/hr	3882	0.31
No.2	0.06 lb/hr	6829	0.21
No.3	0.24 lb/hr w/noncondensibles	7462	<u>0.90</u>
		Total	1.42