Pd. $1000.00
Receipt # 76193
V# 9396

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

AC 16-141790

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

DER

NOV 12 1987

BAQM

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ERNEST F. FREY
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New[1] [X] Existing[1]

APPLICATION TYPE: [X] Construction [ ] Operation [ ] Modification

COMPANY NAME: Seminole Kraft Corporation 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) No.1 Lime Kiln

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.75 North 3365.60

Latitude 30° 25' 15"N Longitude 81 ° 36 ' 00 "W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P.O. Box 26998 Jacksonville, FL 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corp.

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: _____

T. Frank Lee, General Manager
Name and Title (Please Type)

Date: 11-11-87 Telephone No. (904) 751-6400

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, tha

[1] See Florida Administrative Code Rule 17-2.100(57) and (104)

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 John T. McKinnon, P.E.

John T. McKinnon P.E.
Name (Please Type)

Stone Container Corporation
Company Name (Please Type)

Suite 400
2150 Parklake Drive, Atlanta, GA 30345
Mailing Address (Please Type)

Florida Registration No. 37697 Date: 11-11-87 Telephone No. (404) 621-6709

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.

See Attachment A

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

Start of Construction Sept 12, 1988 Completion of Construction Sept 12, 1989

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.)

Relocate #3 Mud Filter to #1 Lime Kiln - $100,000

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

Operating Permit A016-71212

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr_____; if seasonal, describe:_____

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? NA

   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.

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

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

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

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

   a. If yes, for what pollutants?_____

   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.

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		
Lime Mud	NA	NA	24,000	14

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

1. Total Process Input Rate (lbs/hr): 24,000 lbs/hour (Dry Basis)

2. Product Weight (lbs/hr): 12,200 lbs CaO/hr (Dry Basis)

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[2] 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	
Particulate	16	63	(a) $E=3.59P^{0.62}$	16	(b) 8,212,500	4,106	14
Visible Emission		NA	10% Opacity	NA	NA		
TRS		NA	20 ppm (d)	NA	913,668	457	

[1] See Section V, Item 2.

[2] Reference 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)

[3] Calculated from operating rate and applicable standard.

[4] Emission, if source operated without control (See Section V, Item 3).

a) 17.2650(2)(c)(9)
b) AP-42
c) EPA 450/2-78-003b
d) 17-2.600(4)(c)(5)

$$\frac{4.2 \text{ lb TRS}}{\text{ton pulp}} \times \frac{596 \text{ tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = 913{,}668 \frac{\text{lbs/TRS}}{\text{year}} = \frac{457 \text{ tons}}{\text{year}}$$

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)
Mud filter	TRS	*	NA	See attachments
* Will meet applicable emission limits				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
No.6 Fuel Oil	204 GPH	400 GPH	60

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

Fuel Analysis:

Percent Sulfur: 2.27 Percent Ash: 0.048

Density: 8.0 lbs/gal Typical Percent Nitrogen: 0.3

Heat Capacity: 18,750 BTU/lb 150,000 BTU/gal

Other Fuel Contaminants (which may cause air pollution): -

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average NA Maximum

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

Dust recovered by the lime kiln scrubber is recycled back to kiln and water is used in liquor make up cycle.

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

Stack Height: 69.0 ft. Stack Diameter: 5.83 ft.

Gas Flow Rate: 29,100 ACFM 16,180 DSCFM Gas Exit Temperature: 160 °F.

Water Vapor Content: 35 % Velocity: 18 FPS

SECTION IV: INCINERATOR INFORMATION

NA

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 Diamter: _____ 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: See attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Water is used in liquor make up cycle

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)]

   See Section IIIA

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.

   See Section III C and Attachment A

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

   See Section III C

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.)

   See Attachment A

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).

   See Attachment A

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.

   See Attachment B

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).

   See Attachment C

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.

   See attachment D & E

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

NA

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:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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

NA

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^2* _____ 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.

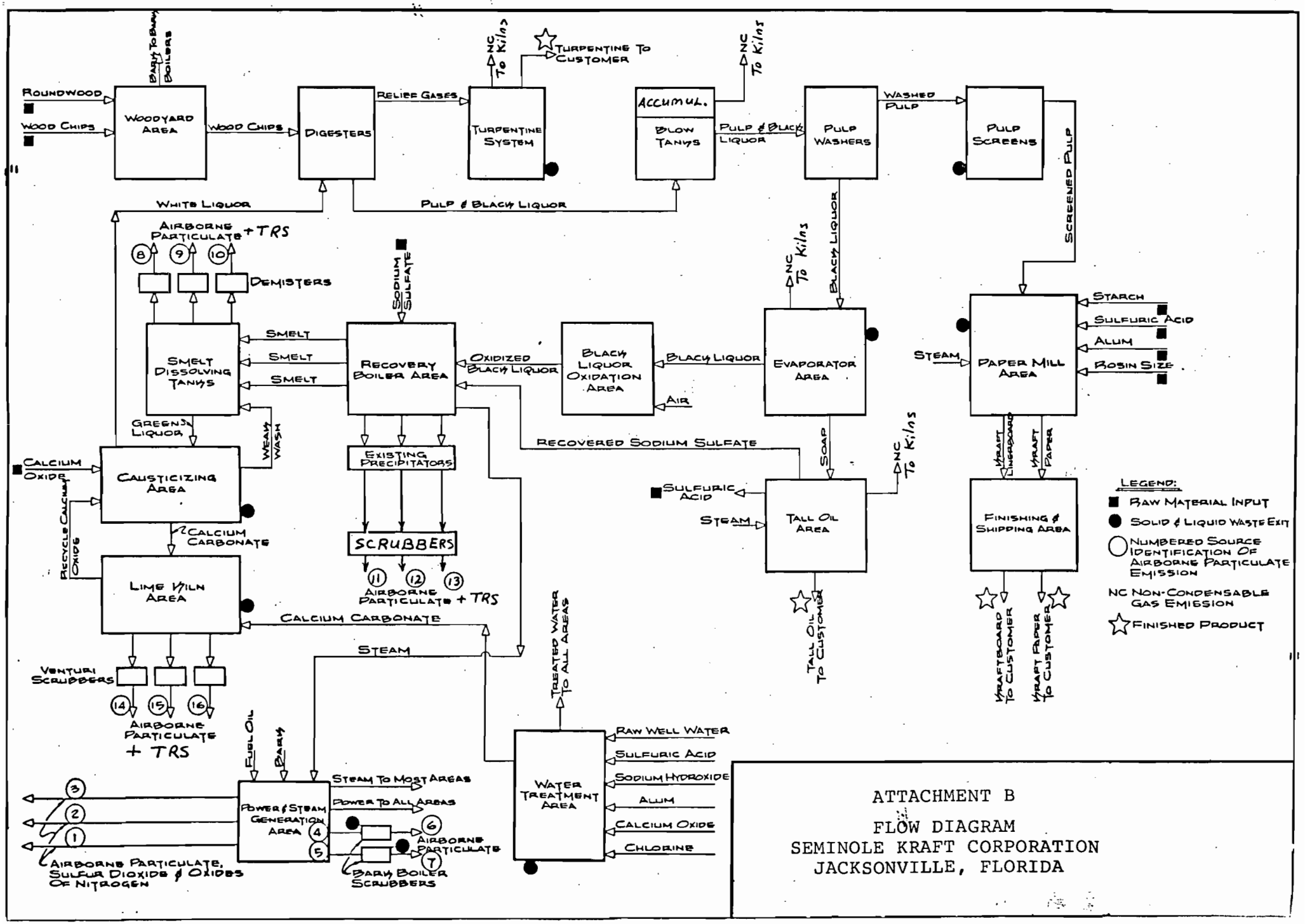
ATTACHMENT A

Lime Kiln No.1 Construction Permit Application

Lime Kiln No.1 is currently equipped with a lime mud filter and exit gas scrubber. The mud filter showers and scrubber make-up are supplied from the pulp mill hot condensate system (from the blow heat accumulators). The current mud filter on Lime Kiln No.1 is too small to provide adequate sulfide removal in order to meet the 20 ppm TRS limit in the Florida TRS rule. The hot condensate currently used occasionally is contaminated, causing intermittent spikes in TRS emissions.

This construction permit will cover the installation of a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up. The new filter will be an 8 foot diameter, 10 foot long filter (taken from Lime Kiln No.3) replacing the existing 6 foot diameter, 8 foot long filter. The larger filter will increase the filtering surface area by 66%, producing a lime kiln feed which is higher in solids and more even in moisture contents. The use of fresh water on the filter showers and scrubber make-up will eliminate the spikes of TRS due to contaminated condensate.

With the installation of this project, the emissions from Lime Kiln No.1 will meet the 20 ppm limit stipulated in the TRS rule.

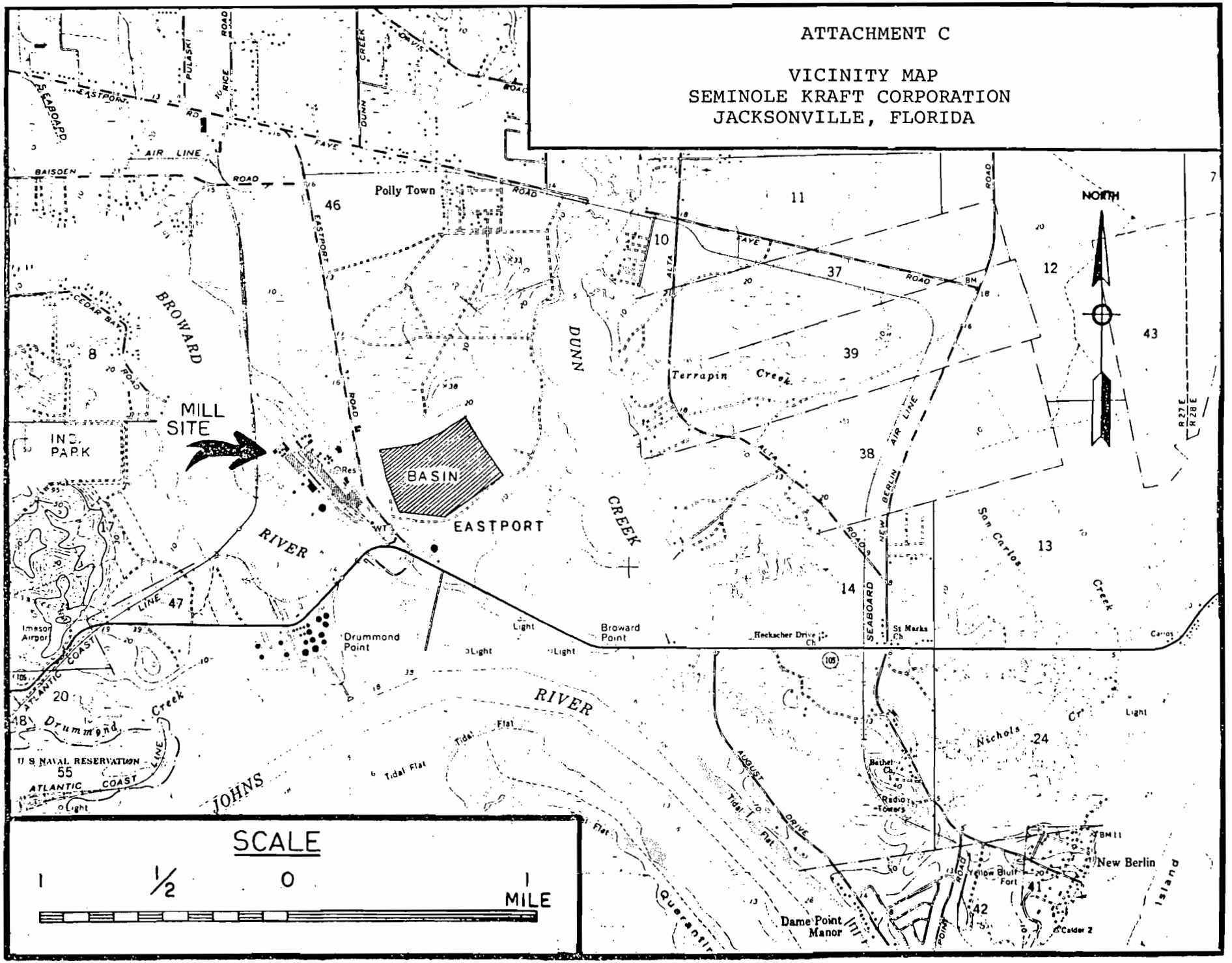


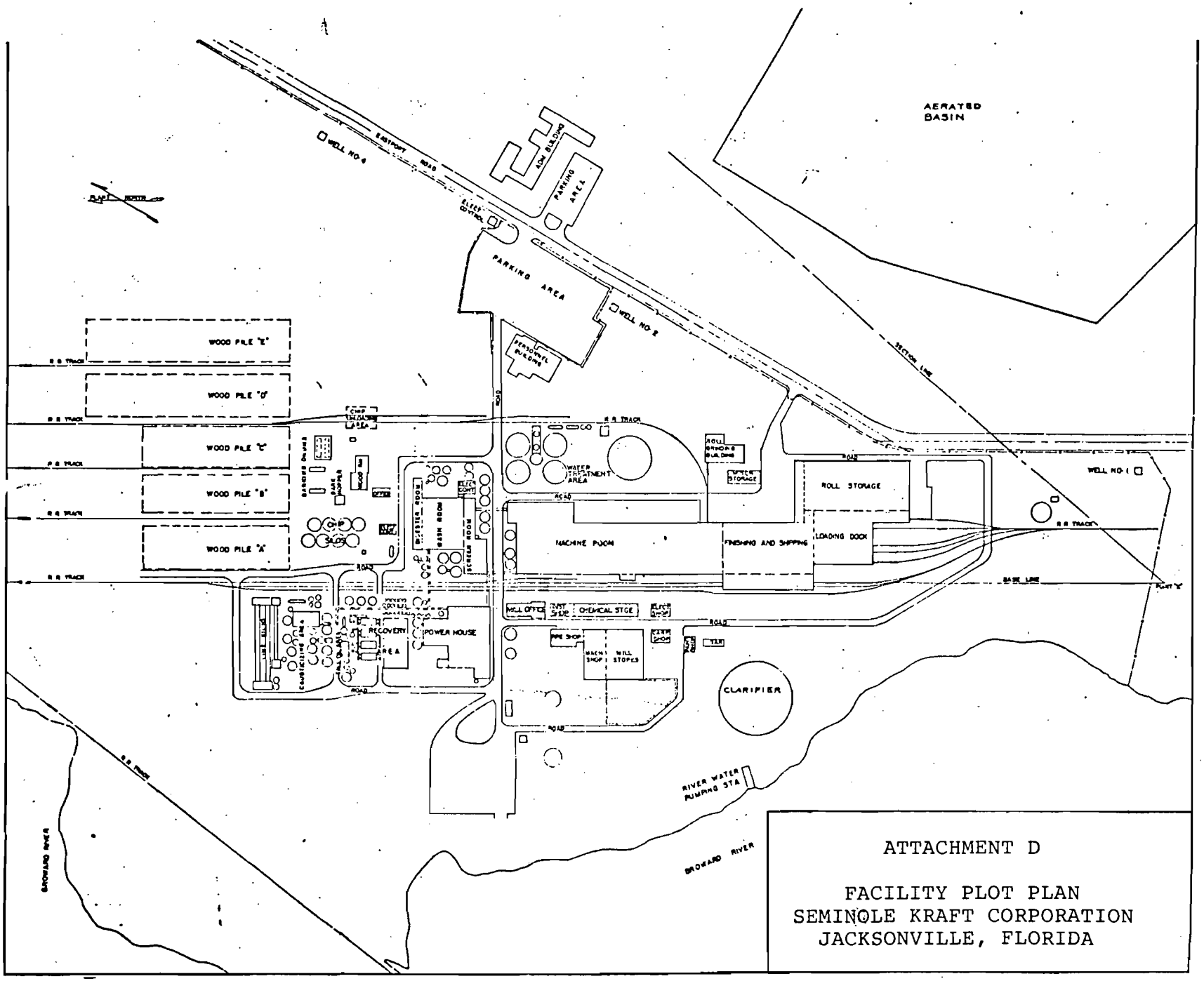
ATTACHMENT B

FLOW DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

ATTACHMENT C

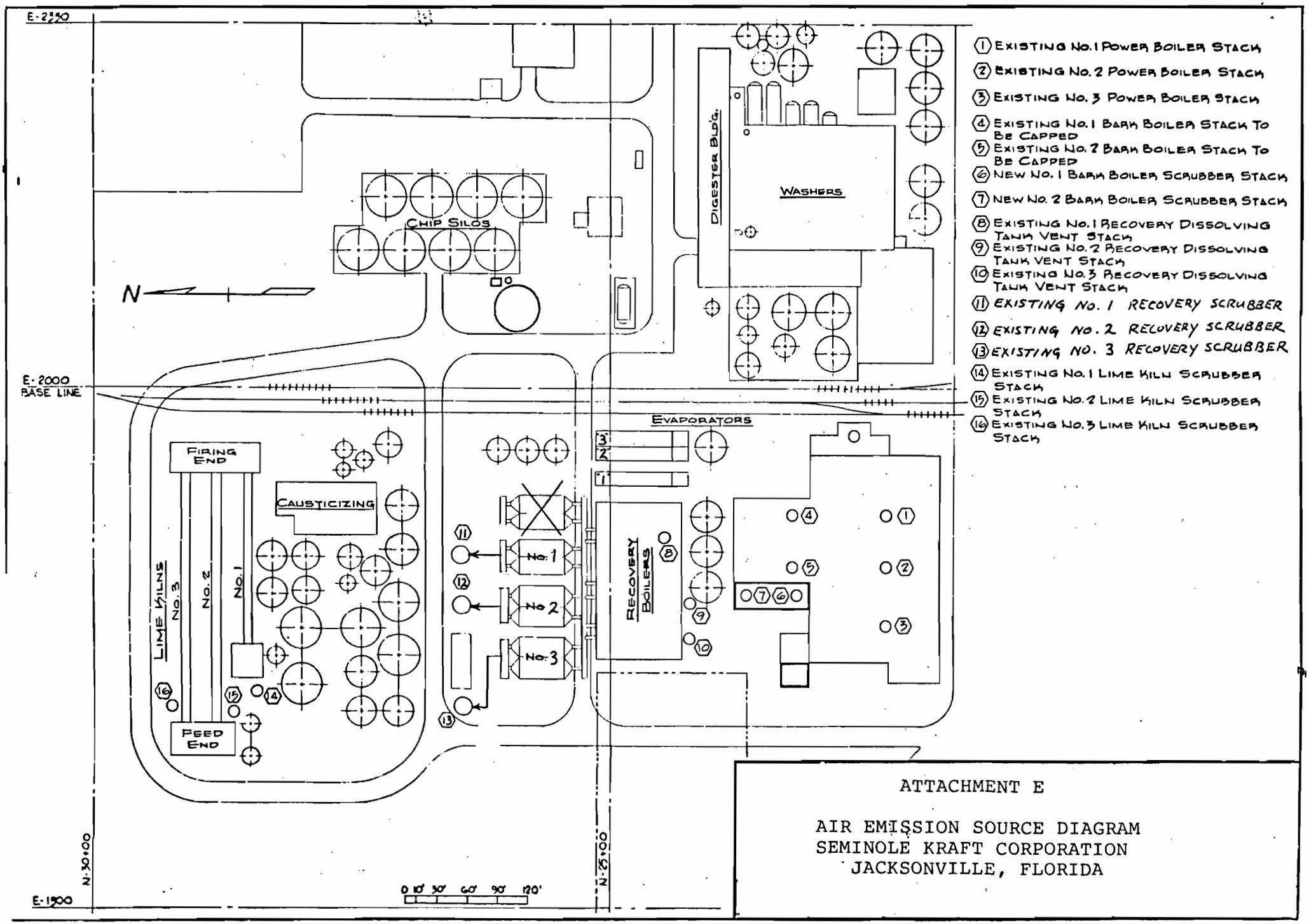
VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





ATTACHMENT D

FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;

2. Execution of permit applications as required for operation of the corporation's facilities; and

3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: _____
Vice President

Pd. $1000.00
✓ # 9397
Receipt # 76193
AC 16-141792

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

DER

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

NOV 12 1987

BAQM

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ERNEST F. FRY
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New[1] [X] Existing[1]

APPLICATION TYPE: [X] Construction [ ] Operation [ ] Modification

COMPANY NAME: Seminole Kraft Corporation 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) #2 Lime Kiln

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.75 North 3365.60

Latitude 30 ° 25 ' 15 "N Longitude 81° 36' 00"W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P.O. Box 26998 Jacksonville, Florida 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corp.

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: _____

T. Frank Lee, General Manager
Name and Title (Please Type)

Date: 11-11-87 Telephone No. (904) 751-6400

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, tha

[1] See Florida Administrative Code Rule 17-2.100(57) and (104)

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 John T. McKinnon, P.E.

John T. McKinnon, P.E.
Name (Please Type)

Stone Container Corporation
Company Name (Please Type)

2150 Parklake Dr. Suite 400, Atlanta, GA 30345
Mailing Address (Please Type)

Florida Registration No. 37697 Date: 11-11-87 Telephone No. (404) 621-6709

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.

See Attachment A

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

Start of Construction Sept 12, 1988 Completion of Construction Sept. 12, 1989

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.)

Replace Mud Filter - $400,000

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

Operating Permit - A016-71213

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr ____; if seasonal, describe: _____

_____

_____

_____

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? NA

   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. _____

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

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

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

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

   a. If yes, for what pollutants? _____

   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.

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		
Lime Mud	NA	NA	32,000	15

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

1. Total Process Input Rate (lbs/hr): 32,000 lbs/hr (Dry Basis)

2. Product Weight (lbs/hr): 16,300 # CaO/hr (Dry Basis)

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[2] 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	
Particulate	16	63	(a) $E=3.59P^{0.62}$	16	(b) 8,212,500	4,106	15
Visible Emissions		NA	10% Opacity	NA	NA		
TRS		NA	(d) 20 ppm	NA	1,218,735	609	

[1] See Section V, Item 2.

[2] Reference 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)

[3] Calculated from operating rate and applicable standard.

[4] Emission, if source operated without control (See Section V, Item 3).

a) 17-2.650(2)(c)(9)
b) AP-42
c) EPA 450/2-78-003b
d) 17-2.600(4)(c)(5)

$$\frac{4.2 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{795 \text{ tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = 1{,}218{,}735 \frac{\text{lbs TRS}}{\text{year}} = 609 \frac{\text{tons}}{\text{year}}$$

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)
Mud Filter	TRS	*	NA	See attachment A
* will meet applicable	emission limits			

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
No.6 Fuel Oil	292 GPH	400 GPH	60

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

Fuel Analysis:

Percent Sulfur: 2.27 Percent Ash: 0.048

Density: 8.0 lbs/gal Typical Percent Nitrogen: 0.3

Heat Capacity: 18,750 BTU/lb 150,000 BTU/gal

Other Fuel Contaminants (which may cause air pollution): -

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average NA Maximum

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

Dust recovered by the scrubber is recycled back to Kiln. The water is used in the liquor make up cycle.

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

Stack Height: 74.58 ft. Stack Diameter: 4.67 ft.

Gas Flow Rate: 26,350 ACFM 16,321 DSCFM Gas Exit Temperature: 150 °F.

Water Vapor Content: 29 % Velocity: 26 FPS

SECTION IV: INCINERATOR INFORMATION NA

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 Diamter: _____ 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:

See attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Water is used in the liquor make up cycle

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)]
   See Section III A
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.
   See Section III C & Attachment A
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
   See Section III C
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.)
   See Attachment A
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).
   See Attachment A
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.
   See Attachment B
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).
   See Attachment C
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.

See Attachment D & E

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

NA

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:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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

NA

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^2* _____ 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.

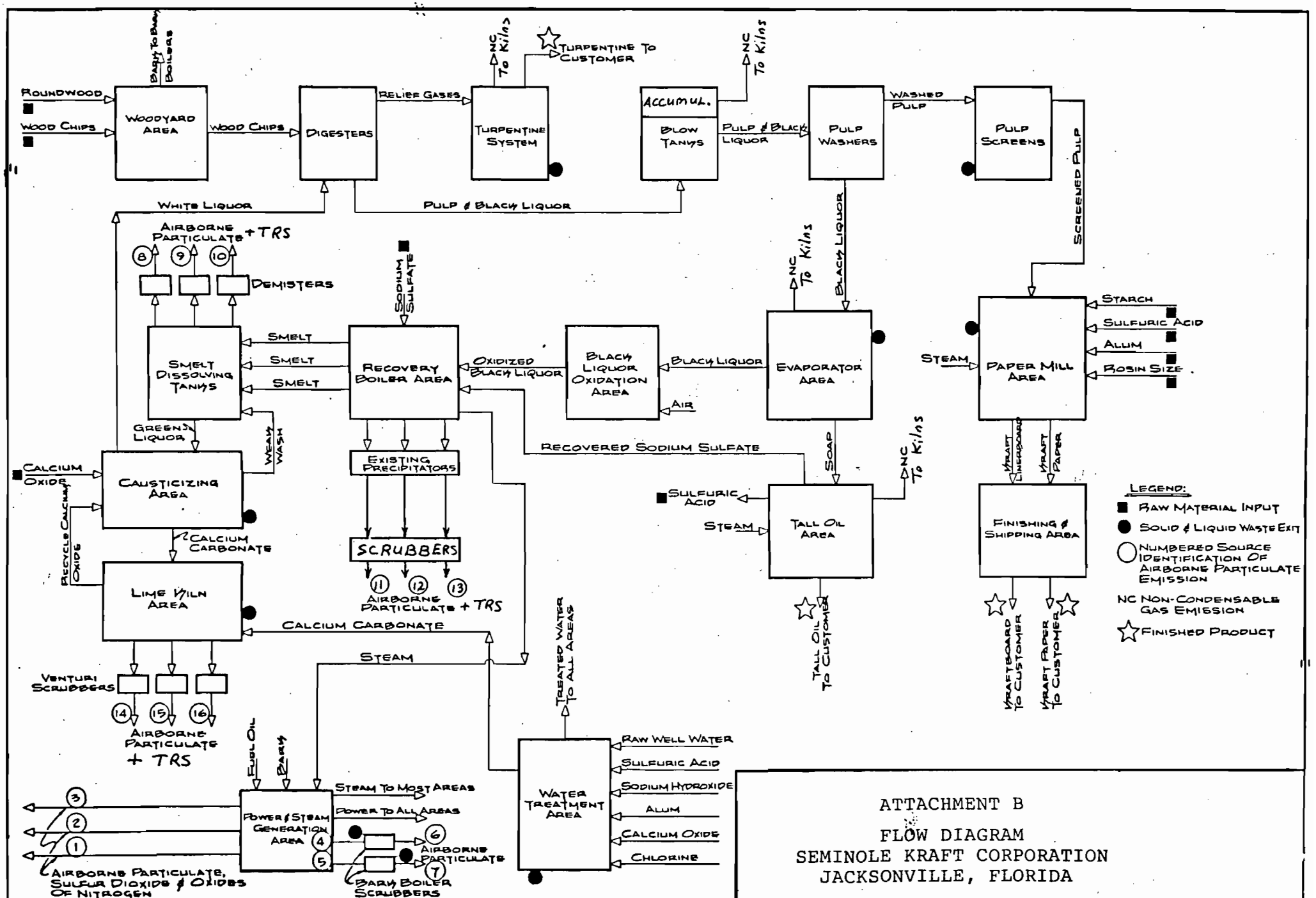
ATTACHMENT A

Lime Kiln No.2 Construction Permit Application

Lime Kiln No.2 is currently equipped with a mud filter and exit gas scrubber. The mud filter showers and scrubber make-up are supplied from the pulp mill hot condensate system (from the blow heat accumulators). The current mud filter on Lime Kiln No.2 is too small to provide adequate sulfide removal in order to meet the 20 ppm TRS limit in the Florida TRS rule. The hot condensate currently used occasionally is contaminated, causing intermittent spikes in TRS emissions.

This construction permit will cover the installation of a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up. The new filter will be an 10 foot diameter, 14 foot long filter (purchased new) replacing the existing 6 foot diameter, 8 foot long filter. The larger filter will increase the filtering surface area by 191%, producing a lime kiln feed which is higher in solids and more even in moisture contents. The use of fresh water on the filter showers and scrubber make-up will eliminate the spikes of TRS due to contaminated condensate.

With the installation of this project, the emissions from Lime Kiln No.2 will meet the 20 ppm limit stipulated in the TRS rule.



ATTACHMENT B

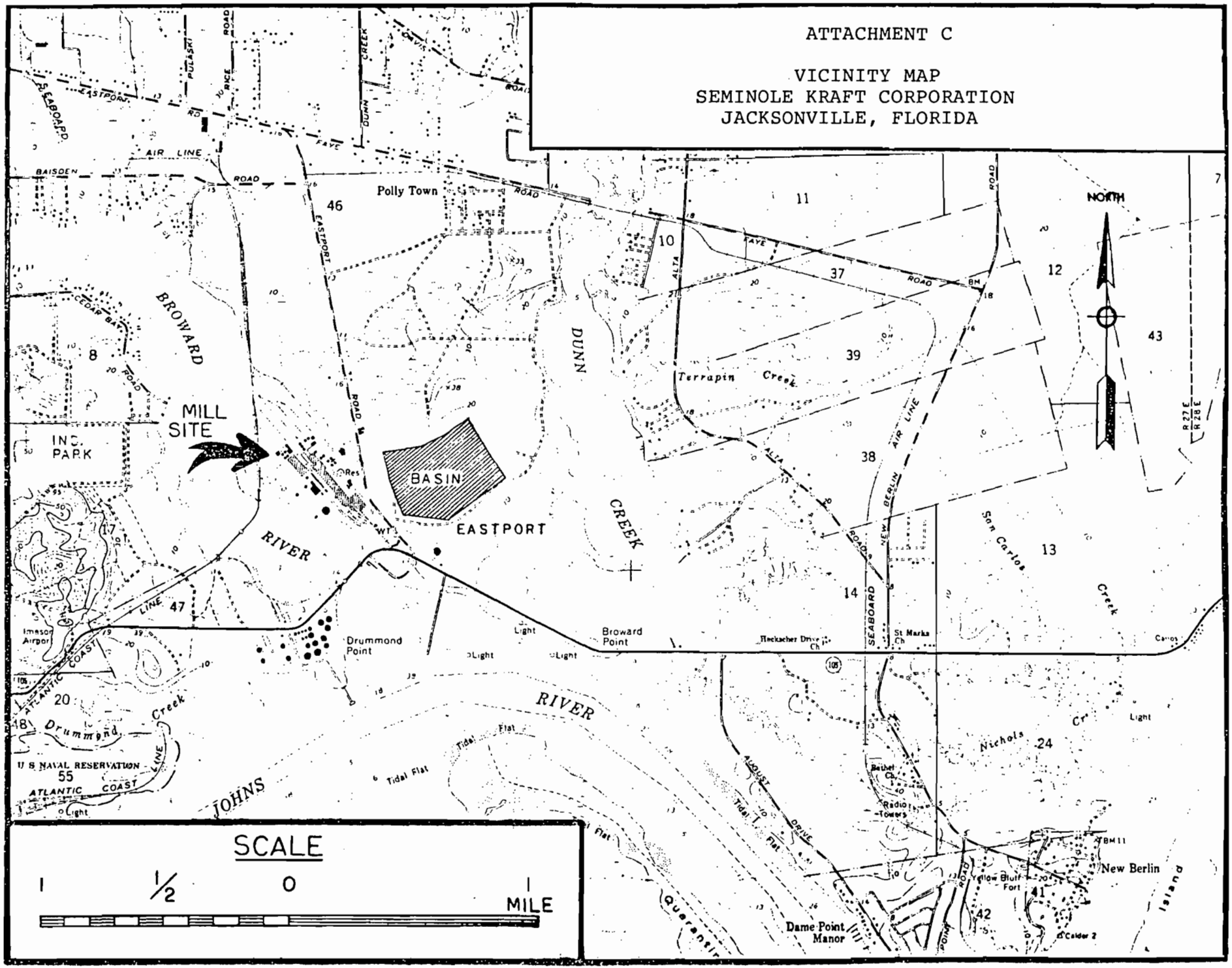
FLOW DIAGRAM

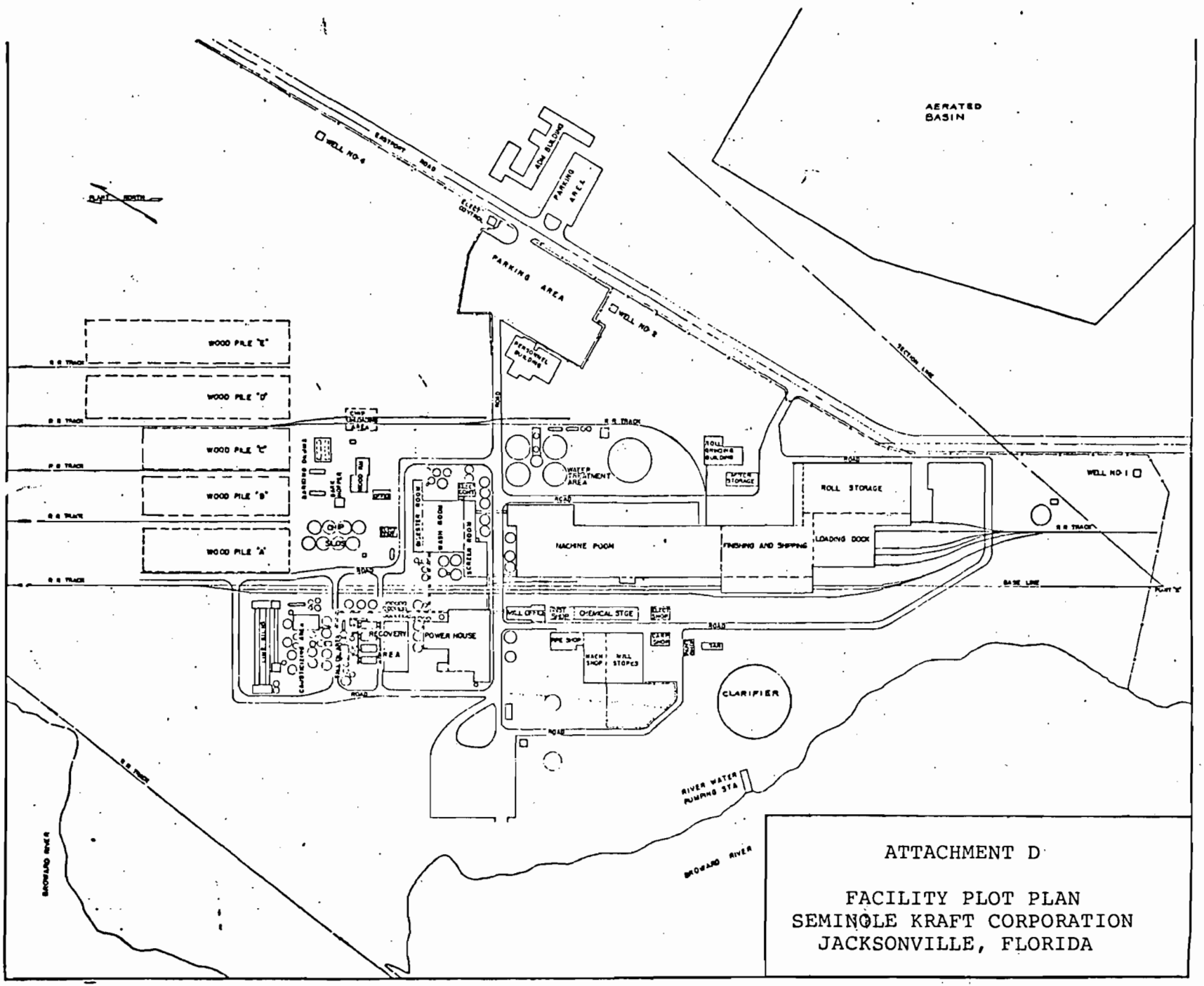
SEMINOLE KRAFT CORPORATION

JACKSONVILLE, FLORIDA

ATTACHMENT C

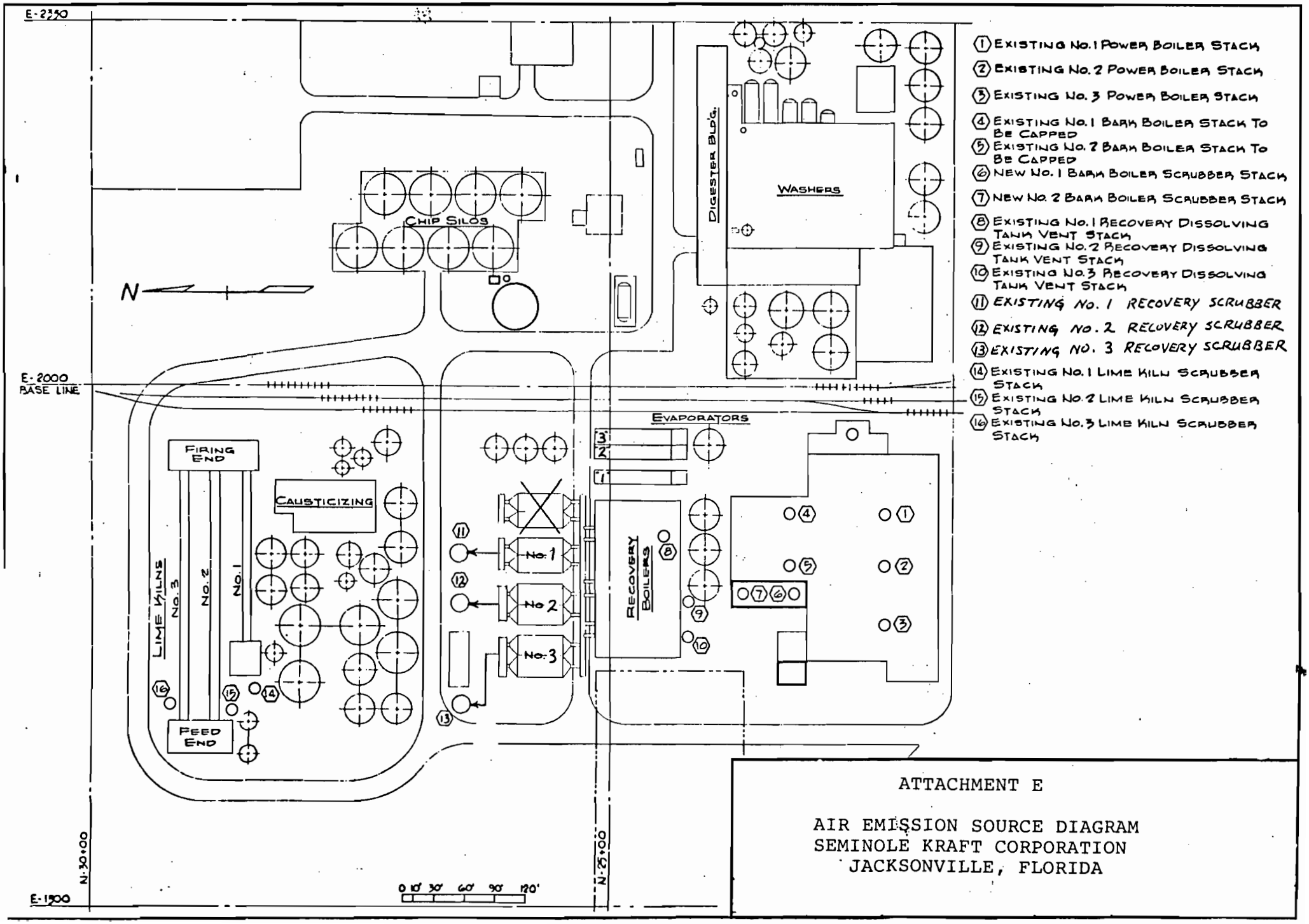
VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





ATTACHMENT D

FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;

2. Execution of permit applications as required for operation of the corporation's facilities; and

3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: _____
Vice President

Pd. $1000.00
V# 9398
Receipt # 76193
AC 16-141793

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

DER

NOV 12 1987

BAQM

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New[1] [X] Existing[1]

APPLICATION TYPE: [X] Construction [ ] Operation [ ] Modification

COMPANY NAME: Seminole Kraft Corporation 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) #3 Lime Kiln

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.75 North 3365.60

Latitude 30 ° 25 ' 15 "N Longitude 81 ° 36 ' 00 "W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P.O. Box 26998 Jacksonville, Florida 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corp.

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: _____

T. Frank Lee, General Manager
Name and Title (Please Type)

Date: 11-11-87 Telephone No. (904)751-6400

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)

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 John T. McKinnon, P.E.

John T. McKinnon, P.E.
Name (Please Type)

Stone Container Corporation
Company Name (Please Type)

2150 Parklake Drive, Suite 400, Atlanta, GA 30345
Mailing Address (Please Type)

Florida Registration No. 37697 Date: 11-11-87 Telephone No. (404) 621-6709

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.

See attachment A

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

Start of Construction Sept 12, 1988 Completion of Construction Sept 12, 1989

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.)

Replace Mud Filter - $400,000

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

Operating Permit A016-71214

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr _____; if seasonal, describe: _____

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? NA

   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. _____

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

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

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

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

   a. If yes, for what pollutants? _____

   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.

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		
Lime Kiln	NA	NA	32,000	16

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

1. Total Process Input Rate (lbs/hr): 32,000 lbs/hr (Dry Basis)

2. Product Weight (lbs/hr): 16,300 lbs CaO/hr (Dry Basis)

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[2] 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	
Particualte	16	63	(a) $E=3.59P^{0.62}$	16	(b) 8,212,500	4,106	16
Visible Emissions		NA	10% Opacity	NA	NA		
TRS		NA	(d) 20 ppm	NA	(c) 1,218,735	609	

[1]See Section V, Item 2.

[2]Reference 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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).
a) 17-2.605(2)(c)(9)
b) AP-42
c) EPA 450/2-78-003b
d) 17-2.600(4)(c)(5)

$$\frac{4.2 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{795 \text{ tons}}{\text{day}} \times \frac{365 \text{ Days}}{\text{year}} = \frac{1{,}218{,}735 \text{ lbs TRS}}{\text{year}} = 609 \frac{\text{tons}}{\text{year}}$$

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)
Mud Filter	TRS	*	NA	See Attachment A
* Will meet applicable	emission limits			

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
No.6 Fuel Oil	289 GPH	400 GPH	60

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

Fuel Analysis:

Percent Sulfur: 2.27 Percent Ash: 0.048

Density: 8.0 lbs/gal Typical Percent Nitrogen: 0.3

Heat Capacity: 18,750 BTU/lb 150,000 BTU/gal

Other Fuel Contaminants (which may cause air pollution): -

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average NA Maximum

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

Dust recovered by the scrubber is recycled back to kiln. The water is used in the liquor make up cycle.

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

Stack Height: 75.25 ft. Stack Diameter: 3.67 ft.

Gas Flow Rate: 22,275 ACFM 14,189 DSCFM Gas Exit Temperature: 150 °F.

Water Vapor Content: 26 % Velocity: 35 FPS

SECTION IV: INCINERATOR INFORMATION NA

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 Diamter: _____ 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: _____

See Attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Water is used in the liquor make up cycle.

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)]

   See Section III A

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.

   See Section III C and Attachment A

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

   See Section III C

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.)

   See Attachment A

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).

   See Attachment A

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.

   See Attachment B

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).

   See Attachment C

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.

   See Attachments D & E

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 NA

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:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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

NA

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^2* _____ 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.

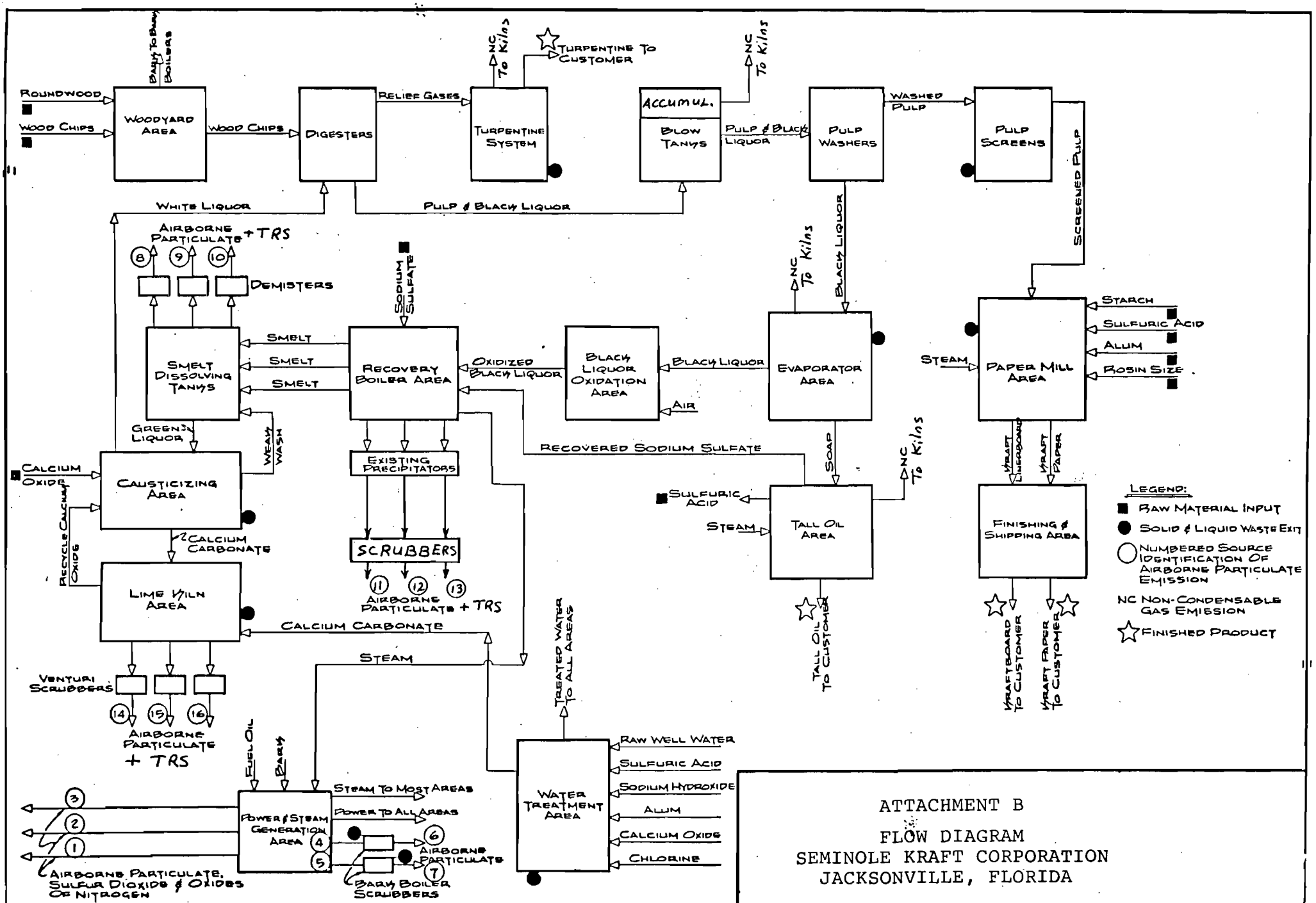
ATTACHMENT A

Lime Kiln No.3 Construction Permit Application

Lime Kiln No.3 is currently equipped with a mud filter and exit gas scrubber. The mud filter showers and scrubber make-up are supplied from the pulp mill hot condensate system (from the blow heat accumulators). The current mud filter on Lime Kiln No.3 is too small to provide adequate sulfide removal in order to meet the 20 ppm TRS limit in the Florida TRS rule. The hot condensate currently used occasionally is contaminated, causing intermittent spikes in TRS emissions.

This construction permit will cover the installation of a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up. The new filter will be an 10 foot diameter, 14 foot long filter (purchased new) replacing the existing 8 foot diameter, 10 foot long filter. The larger filter will increase the filtering surface area by 75%, producing a lime kiln feed which is higher in solids and more even in moisture contents. The use of fresh water on the filter showers and scrubber make-up will eliminate the spikes of TRS due to contaminated condensate.

With the installation of this project, the emissions from Lime Kiln No.3 will meet the 20 ppm limit stipulated in the TRS rule.

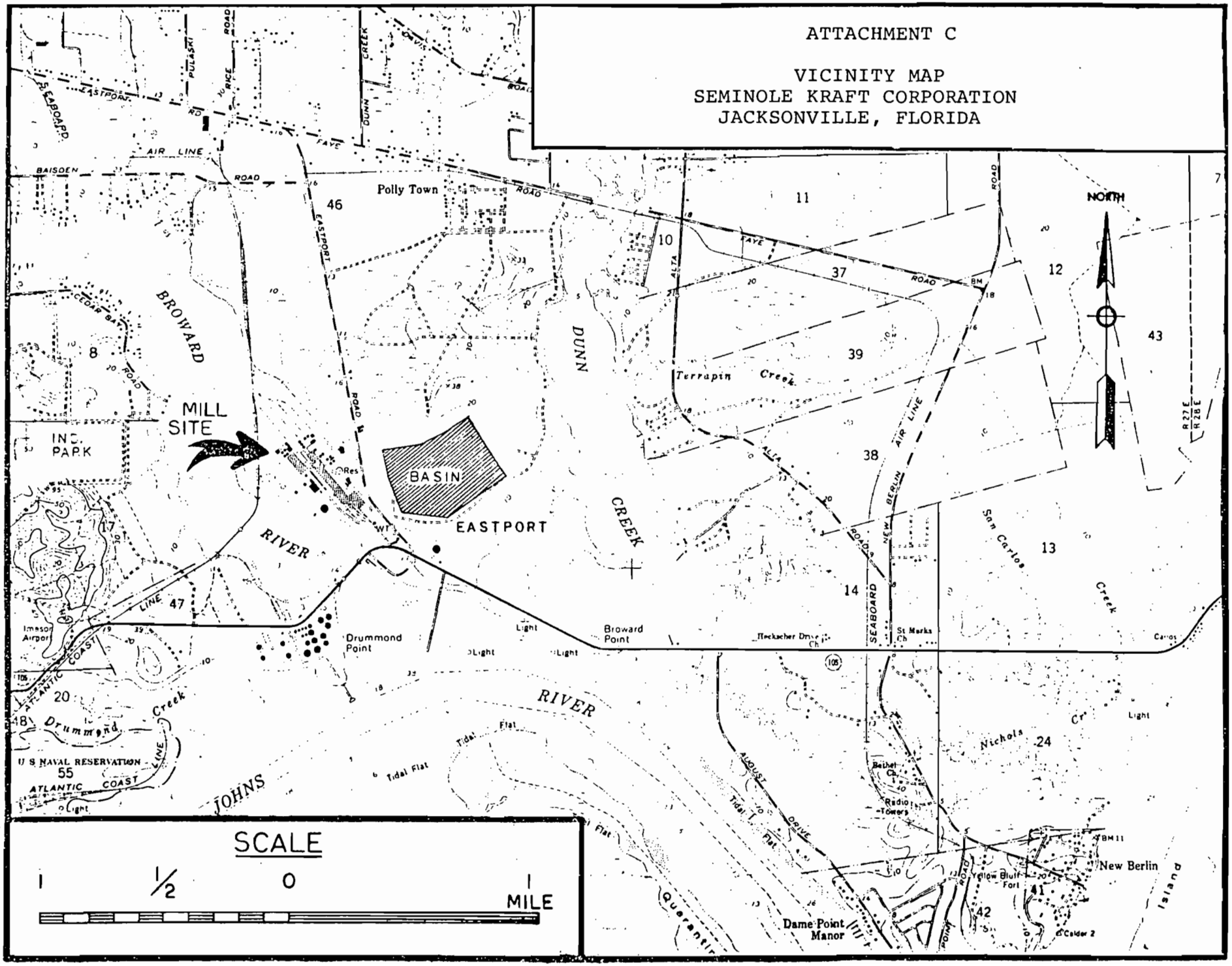


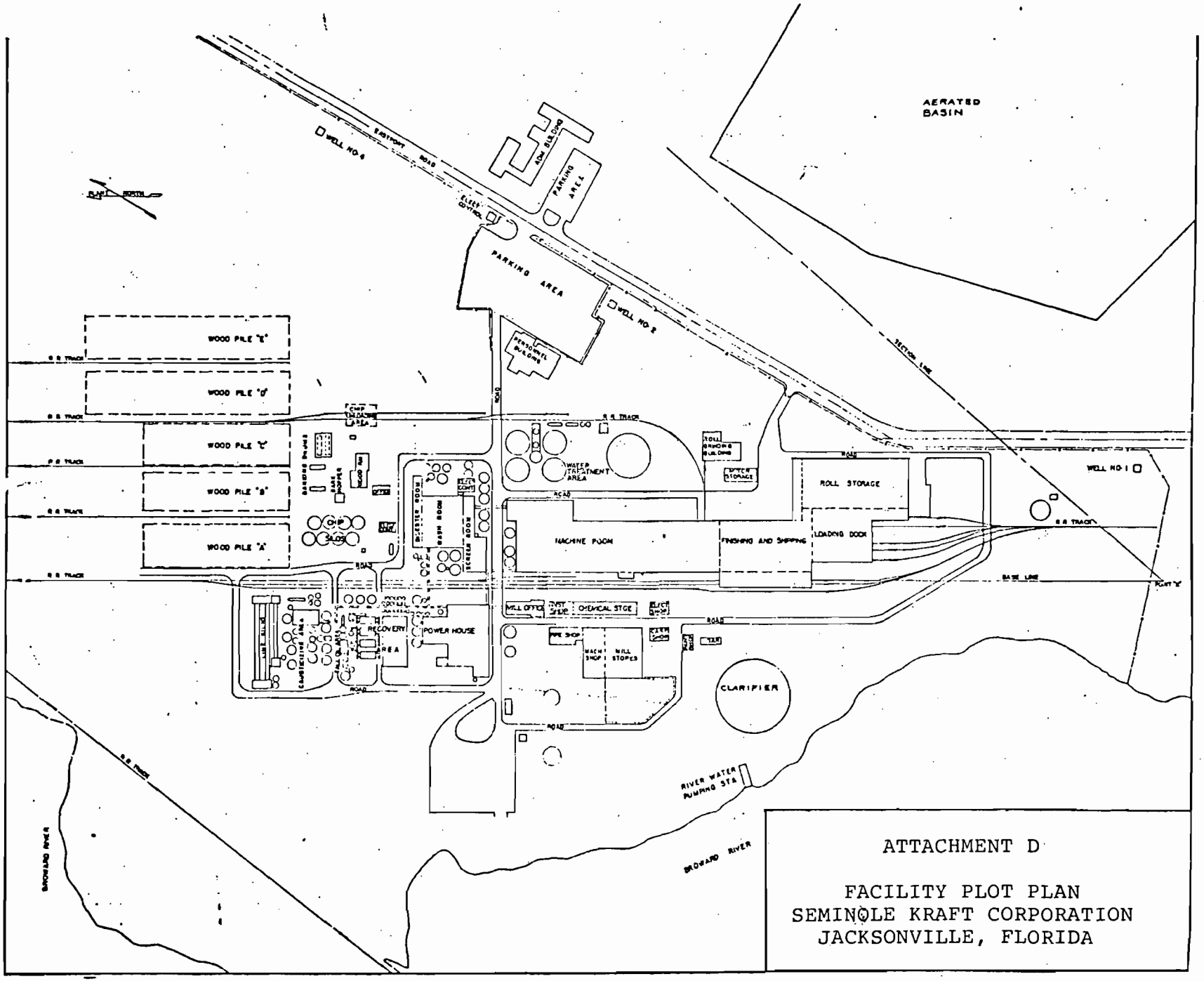
ATTACHMENT B

FLOW DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

ATTACHMENT C

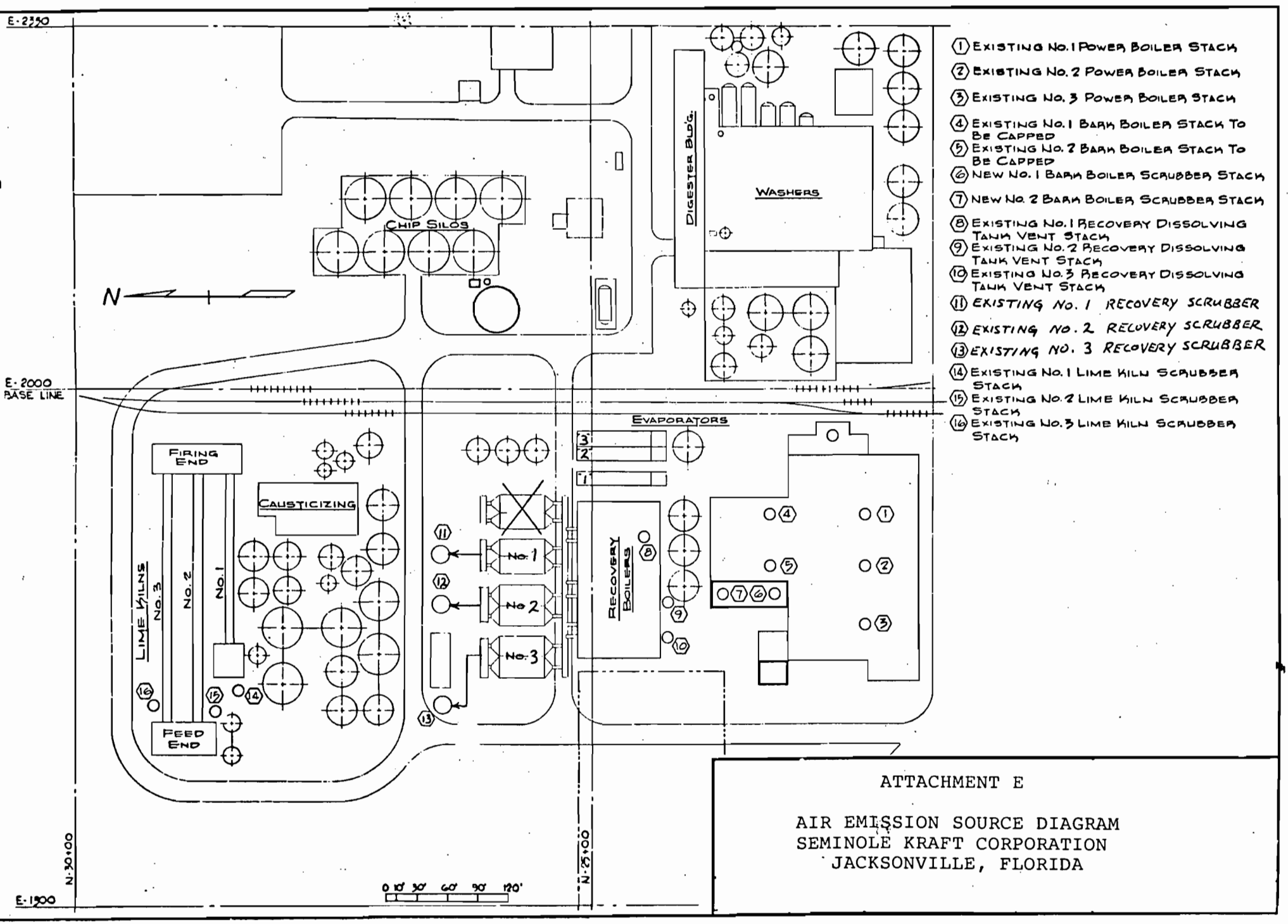
VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





ATTACHMENT D

FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;

2. Execution of permit applications as required for operation of the corporation's facilities; and

3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: _____
Vice President

Pd. $1000.00
V# 9392
Receipt #76193

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

AC 16-141798

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

DER

NOV 12 1987

BAQM

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ERNEST F. FREY
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New[1] [x] Existing[1]

APPLICATION TYPE: [x] Construction [ ] Operation [ ] Modification

COMPANY NAME: Seminole Kraft Corporation 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) #1 and #2 Batch Digester System

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.75 North 3365.60

Latitude 30 ° 25 ' 15 "N Longitude 81 ° 36 ' 00 "W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P. O. Box 26998, Jacksonville, Florida 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corporation

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: _____

T. Frank Lee, General Manager
Name and Title (Please Type)

Date: 11/11/87 Telephone No. 904/751-6400

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)

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 John T. McKinnon, P.E.

John T. McKinnon, P.E.
Name (Please Type)

Stone Container Corporation
Company Name (Please Type)

Suite 400, 2150 Parklake Dr., Atlanta, GA 30345
Mailing Address (Please Type)

Florida Registration No. 37697 Date: 11/11/87 Telephone No. 404/621-6709

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.

See Attachment A

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

Start of Construction May 12, 1988 Completion of Construction November 12, 1988

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.)

NCG System Upgrade - $65,000

Computer Control System - $1,985,000

Total $1,250,000

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

Draft Interim Operating Permit - A016-116140

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr_____; if seasonal, describe:_____

F. If this is a new source or major modification, answer the following questions. NA (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? _____

   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. _____

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

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

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

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? no

   a. If yes, for what pollutants?_____

   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.

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		
Wood Chips	NA	NA	580,000	21 & 22
Black & White Liquor			898,000	
Note: As No. 1 and No. 2 Batch digester systems vary in proportion to total process raw materials, the following information represents the totals of both systems under average operating conditions.				

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

1. Total Process Input Rate (lbs/hr): 1,478,000 lbs./hr

2. Product Weight (lbs/hr): 165,583 16 A.D. Pulp/hr.

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[2] 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	
TRS	NA - Incinerated in lime kilns				7,615,178	3808	21 & 22

[1]See Section V, Item 2.

[2]Reference 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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

EPA - 450/2-78-003 b

$$10.5 \text{ lbs. TRS} \times \frac{1987 \text{ A.D. Tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = 7{,}615{,}178 \frac{\text{Lbs TRS}}{\text{year}}$$

$$= 3808 \frac{\text{tons}}{\text{year}}$$

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)
Incineration in	TRS	~ 100%	NA	See attachment A
Lime Kiln				

E. Fuels NA

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. NA

Annual Average _____ Maximum _____

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

Nothing from digester system is intentionally wasted. Small amounts of fiber and black liquor are inadvertently lost in process. These materials are treated by an on-site NPDES waste treatment system. Sludge from waste treatment system is disposed in on-site landfill.

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

Stack Height: See LimeKiln ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION NA

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 Diamter: _____ 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: See Attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.): NA

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)]
   See Section III A
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.
   See Section III C and Attachment A
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
   See Section III C
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.)
   See Attachment A
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).
   See Attachment A
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.
   See Attachment B
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).
   See Attachment C
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.
   See Attachments D & E

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 NA

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:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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 NA

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^2* _____ 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.

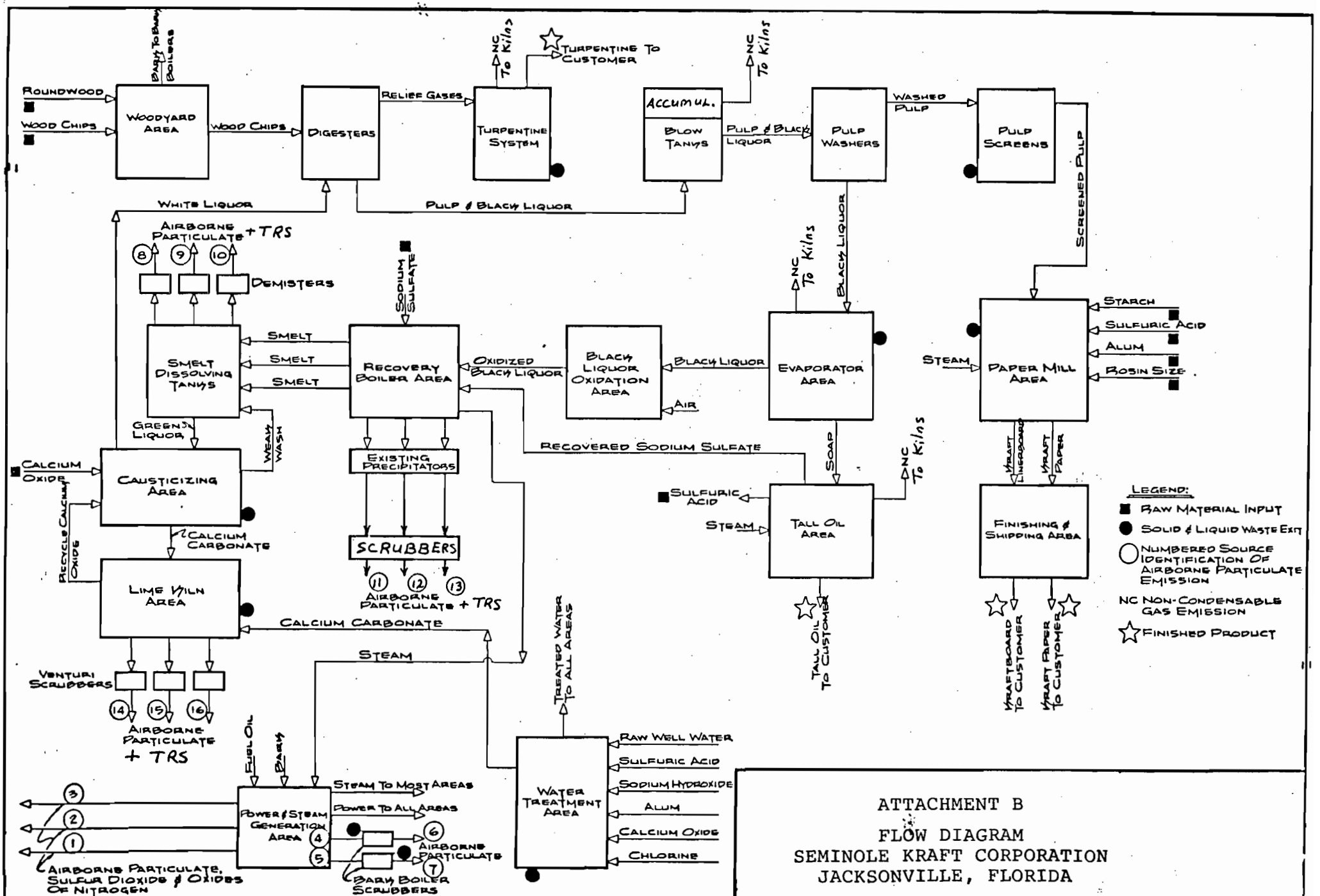
ATTACHMENT A

No.1 and 2 Batch Digester Systems Construction Permit Application

TRS emissions from No.1 and 2 Batch Digester Systems are currently controlled by collection in an existing non-condensible gas (NCG) system and incineration in either of No.2 or No.3 Lime Kilns. The use of lime kilns to achieve complete destruction of TRS compounds is a recognized technology that is well documented. As stated in EPA 4450/3-83-017, "Review of New Source Performance Standards for Kraft Pump Mills", incineration in lime kilns adequately achieves the 1200 F and 0.5 second retention time required to completely destroy TRS compounds. This is because a temperature of 1200 F or above is necessary to calcine the lime mud to CaO, and lime kilns (such as Seminole's) typically have at least two to three seconds of retention time. EPA further recognized this fact in their reviews of the standards for pulp mills (49 FR 2452 and 51 FR 18538), and deleted the requirement to monitor the lime kiln temperatures. Thus, it is appropriate to assume 100% destruction of all TRS compounds collected from No.1 and 2 Digester Systems by the NCG System using incineration in lime kiln No.2 or 3.

This construction permit covers installation of a pulp mill computer control system and an upgrade of the existing NCG System. A computer control system will be installed in the pulp mill digester area to control and sequence the digester cooks and blows. This system will smooth out the flows of non-condensible gasses into the NCG system and will control the venting from the pressure relief valves on the blow tanks and blow heat accumulators. The NCG System upgrade will consist of piping changes at the inlet of the induced draft fan to prevent condensate from entering the fan. This will improve fan reliability and eliminate condensate in the combustion air to the kilns, improving combustion control.

The equipment installed under this construction permit will allow the digester systems to comply with the Florida TRS rule.



ATTACHMENT B

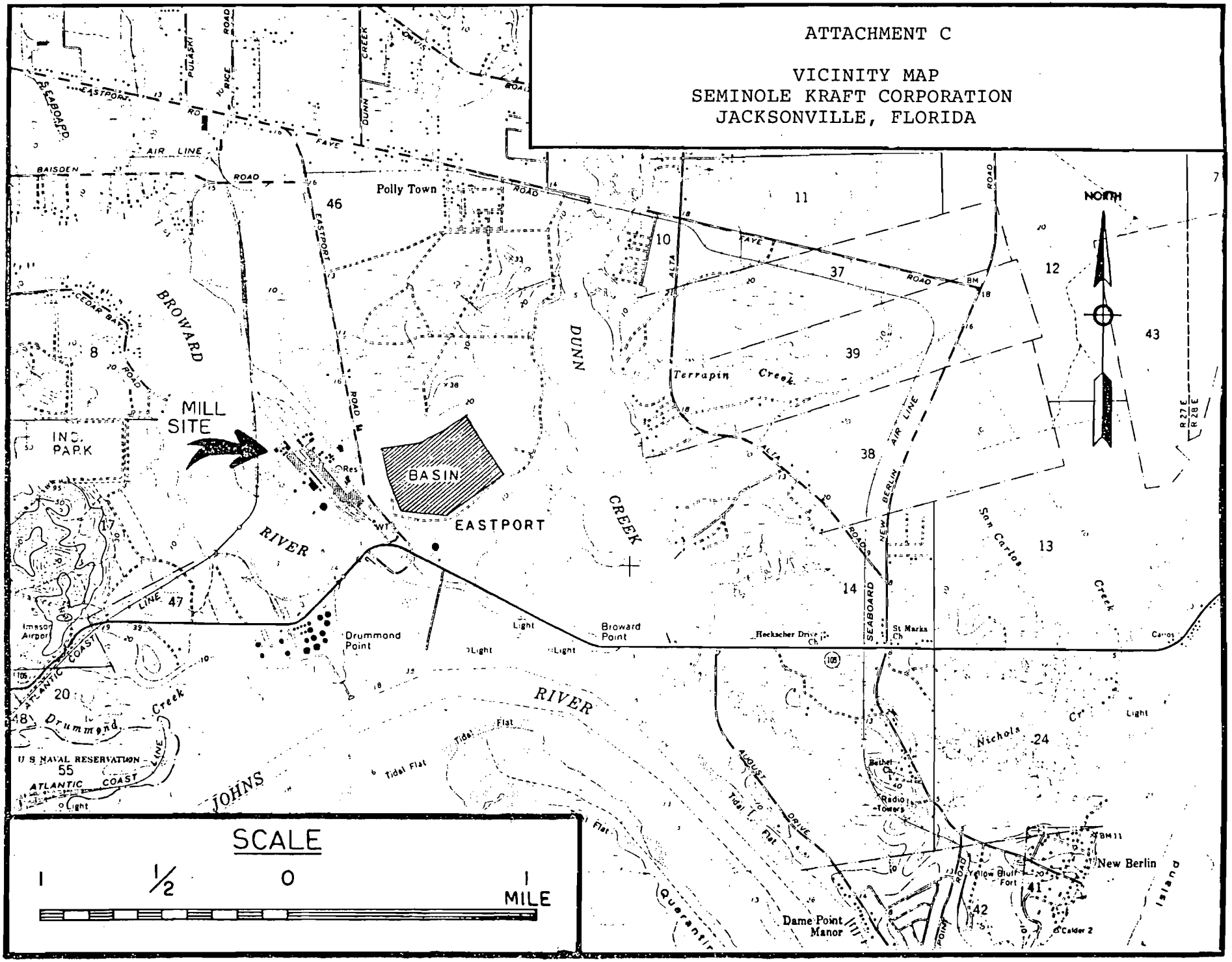
FLOW DIAGRAM

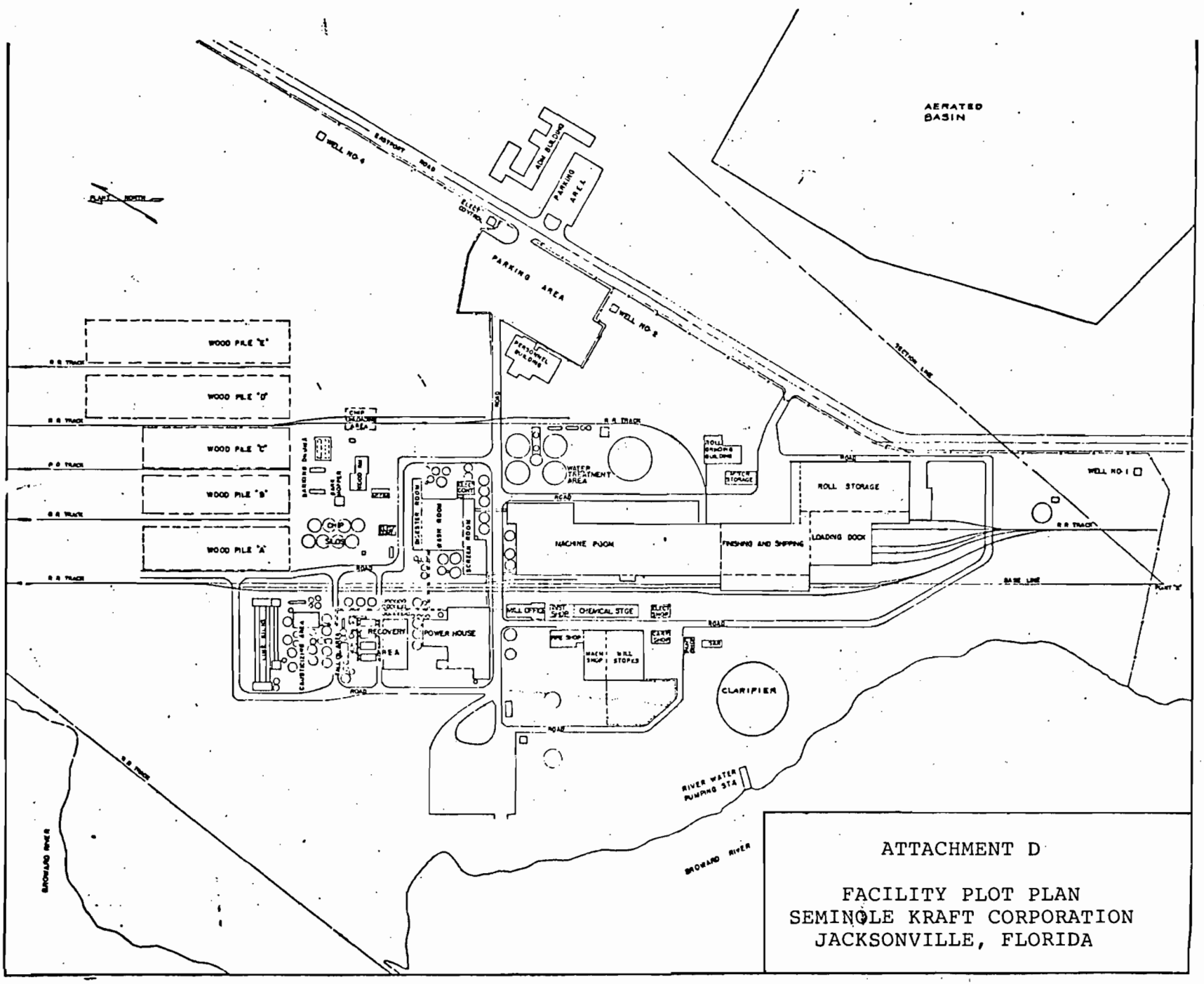
SEMINOLE KRAFT CORPORATION

JACKSONVILLE, FLORIDA

ATTACHMENT C

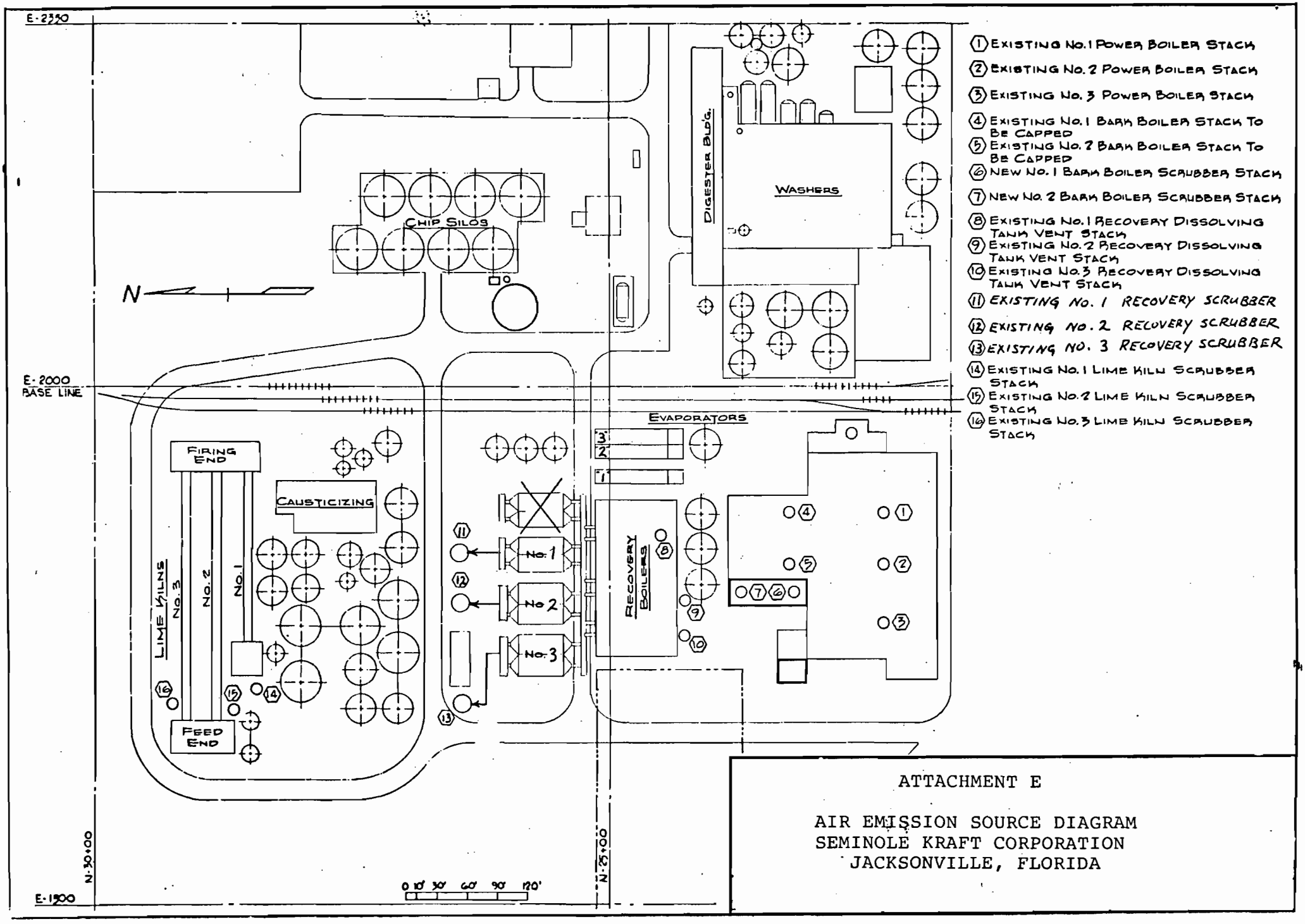
VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





ATTACHMENT D

FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;

2. Execution of permit applications as required for operation of the corporation's facilities; and

3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: _____
Vice President

Pd. $1000.00
9393
Receipt # 76193
AC 16-141799

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

DER

NORTHEAST DISTRICT
3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

NOV 12 1987

BAQM

BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New[1] [x] Existing[1]

APPLICATION TYPE: [x] Construction [ ] Operation [ ] Modification

COMPANY NAME: Seminole Kraft Corporation 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)#1 Line Multi-Effect Evaporators

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.75 North 3365.60

Latitude 30 ° 25 ' 15 "N Longitude 81 ° 36 ' 00 "W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P. O. Box 26998, Jacksonville, Florida 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corporation

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: _____

T. Frank Lee, General Manager
Name and Title (Please Type)

Date: 11/11/87 Telephone No. 904/751-6400

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, tha

[1] See Florida Administrative Code Rule 17-2.100(57) and (104)

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 John T. McKinnon, P.E.

John T. McKinnon, P.E.
Name (Please Type)

Stone Container Corporation
Company Name (Please Type)

Suite 400, 2150 Parklake Drive, Atlanta, GA 30345
Mailing Address (Please Type)

Florida Registration No. 37697 Date: 11/11/87 Telephone No. 404/621-6709

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.

See attachment A

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

Start of Construction complete Completion of Construction complete

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.)

Hotwell covers and vent stack tie-in - $30,000

(cost covers all three lines)

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

Draft Interim Operating Permit - A016-116141

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr_____; if seasonal, describe:_____

F. If this is a new source or major modification, answer the following questions. (Yes or No) NA

1. Is this source in a non-attainment area for a particular pollutant? _____

   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. _____

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

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

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

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

   a. If yes, for what pollutants?_____

   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.

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		
15% Black Liquor	NA	NA	330,000	18

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

1. Total Process Input Rate (lbs/hr): 330,000 lbs/hr @ 15% solids

2. Product Weight (lbs/hr): 99,000 #/hr @ 50% solids

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[2] 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	
TRS	NA - Incinerated in lime kilns				1,225,634	613	18

[1]See Section V, Item 2.

[2]Reference 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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

EPA - 450/2-78- 003b

$$\frac{533 \text{ tons Pulp}}{\text{day}} \times \frac{6.3 \text{ lbs. TRS}}{\text{ton pulp}} \times \frac{365 \text{ days}}{\text{year}} = 1{,}225{,}634 \frac{\text{lbs. TRS}}{\text{year}} = \frac{613 \text{ tons}}{\text{year}}$$

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)
Incineration in lime kiln	TRS	~ 100%	NA	See Attachment A

E. Fuels NA

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: NA

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 _____ Maximum _____

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

Clean condensate to boiler feedwater. Contaminated condensate from hotwell to sewer for treatment in aeration basin.

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

Stack Height: See Lime Kiln ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

NA

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 Diamter: _____ 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:

See Attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Contaminated condensate from hot well to sewer for treatment in aeration basin. Clean condensate returned to boiler feed water.

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)]

   See Section III A

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.

   See Section III C and Attachment A

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

   See Section III C

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.)

   See Attachment A

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).

   See Attachment A

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.

   See Attachment B

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).

   See Attachment C

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.

   See Attachments D & E

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 NA

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:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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

NA

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^2* _____ 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.

ATTACHMENT A

No.1 Line Multiple-Effect Evaporator Construction Permit Application

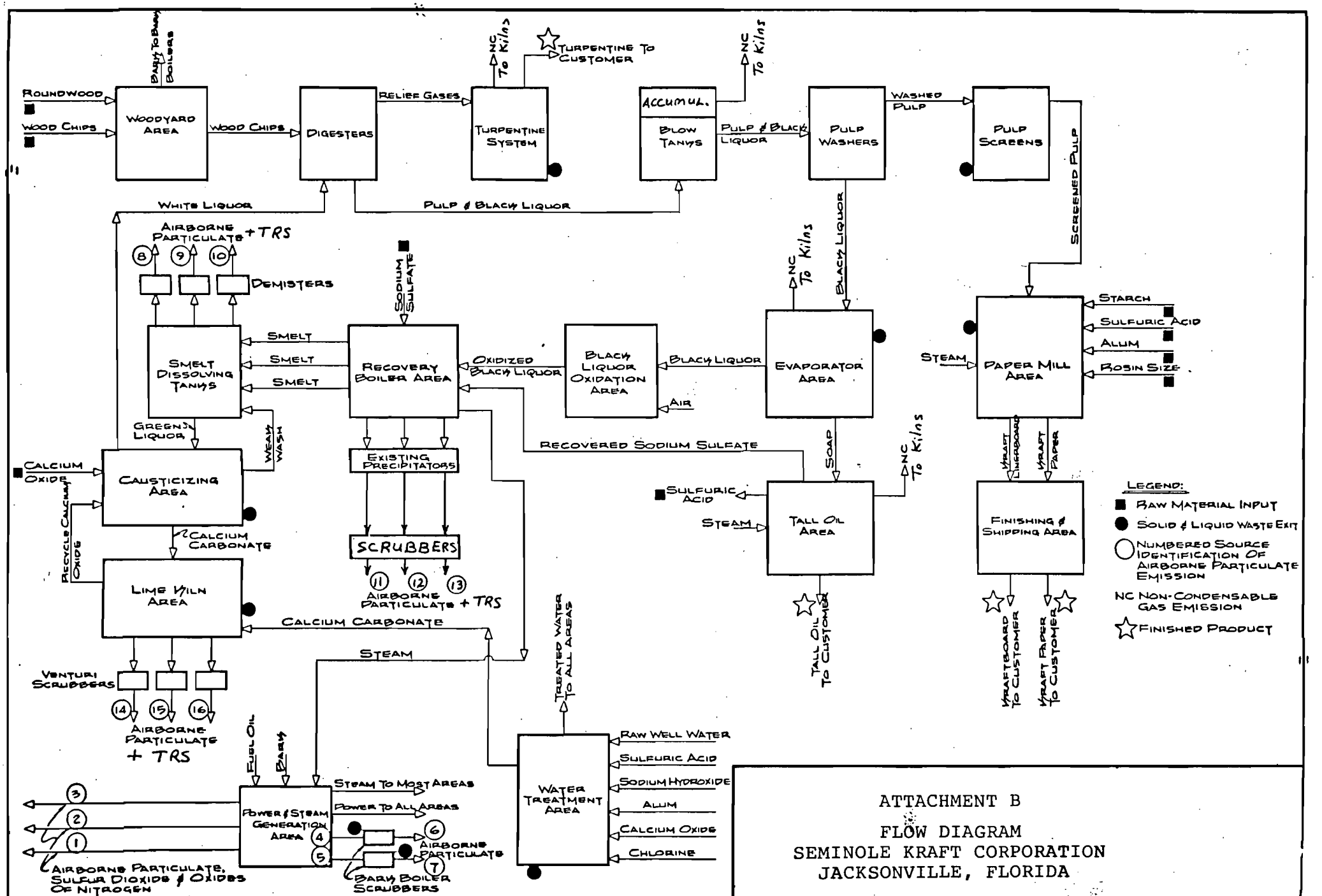
TRS emissions from multiple-effect evaporators are emitted from the condensate hotwells. The hotwell on No.1 Line multiple-effect evaporator was previously open to the atmosphere with no control of TRS.

This construction permit will cover the installation of a stainless steel sheet metal cover on the hotwell with a stack connected to the existing non-condensible gas collection (NCG) system. The cover and stack were installed first in order to analyze the TRS emissions. This was necessary to determine if the mass emission rate of TRS could safely be introduced into the NCG system for incineration in the lime kilns. The data indicated that this was feasible. Then, with the consent of Mr. Jerry Woosley of the Jacksonville BESD, the hotwell stack was tied into the NCG system (along with the hotwells from Numbers 2 and 3 lines multiple-effect evaporators) for a full-scale trial. The piping was installed in a manner which would allow it to be a permanent installation if the trial was successful.

The trial demonstrated that the TRS gasses from all three lines of multiple-effect evaporators may safely be collected in the existing NCG system and incinerated in the lime kilns. Therefore, this construction permit application is to cover the existing installation which is currently in operation.

The use of lime kilns to achieve complete destruction of TRS compounds is a recognized technology that is well documented. AS stated in EPA 450/3-83-017, "Review of New Source Performance Standards for Kraft Pulp Mills", incineration in lime kilns adequately achieves the 1200^{O}F and 0.5 second retention time required to completely destroy TRS compounds. This is because a temperature of 1200^{O}F or above is necessary to calcine the lime mud to CaO, and lime kilns (such as Seminole's) typically have at least two to three seconds of retention time. EPA further recognized this fact in their reviews of the standards for pulp mills (49 FR 2452 and 51 FR 18538), and deleted the requirement to monitor the lime kiln temperatures. Thus, it is appropriate to assume 100% destruction of all TRS compounds from the No.1 Line Multiple-Effect Evaporator in the lime kiln.

Since incineration in lime kilns is a specified control technology in 17-2.600(4)(c)(1)a, FAC, No.1 Line Multiple-Effect Evaporators is currently in compliance with the Florida TRS rule.



ATTACHMENT B

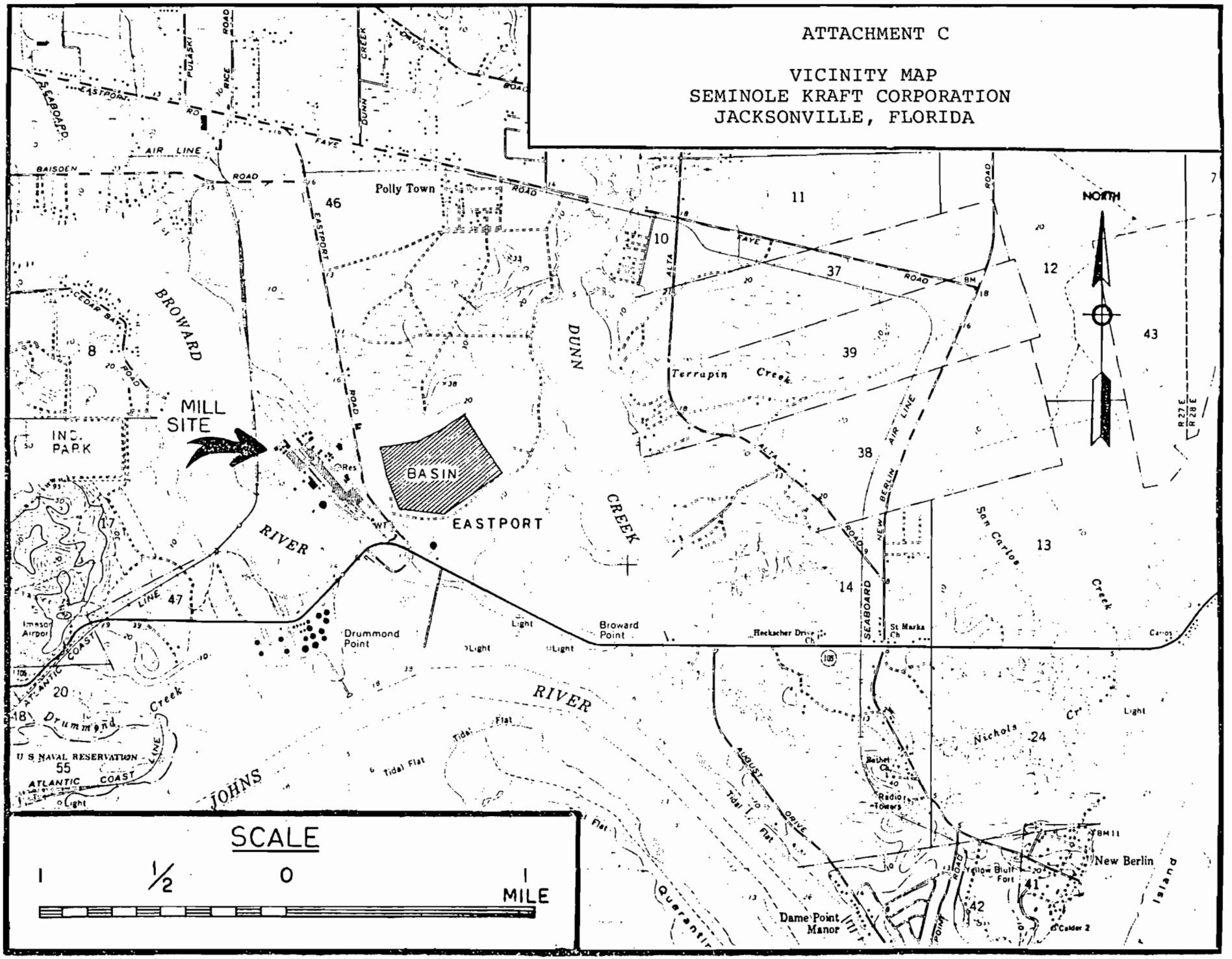
FLOW DIAGRAM

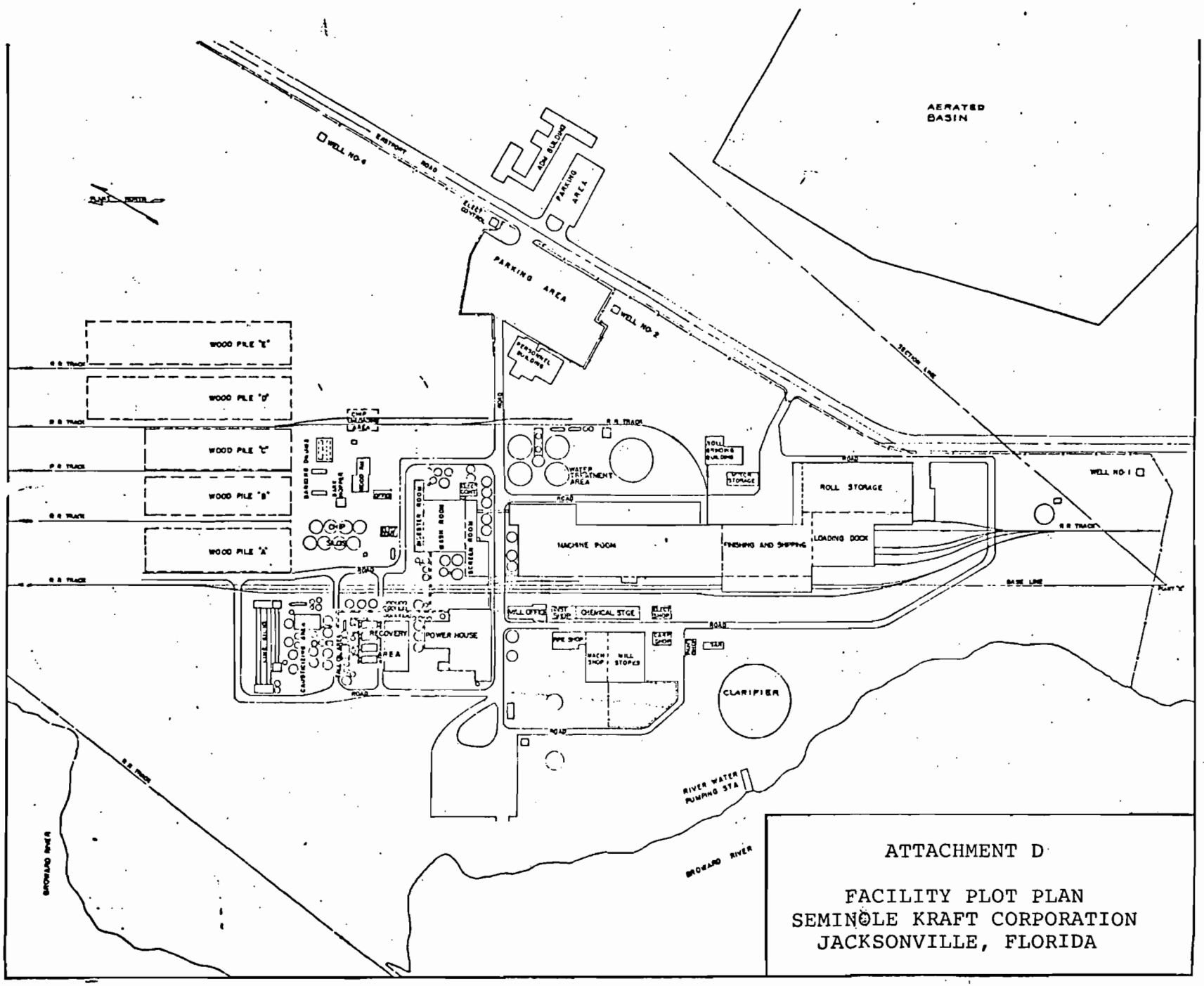
SEMINOLE KRAFT CORPORATION

JACKSONVILLE, FLORIDA

ATTACHMENT C

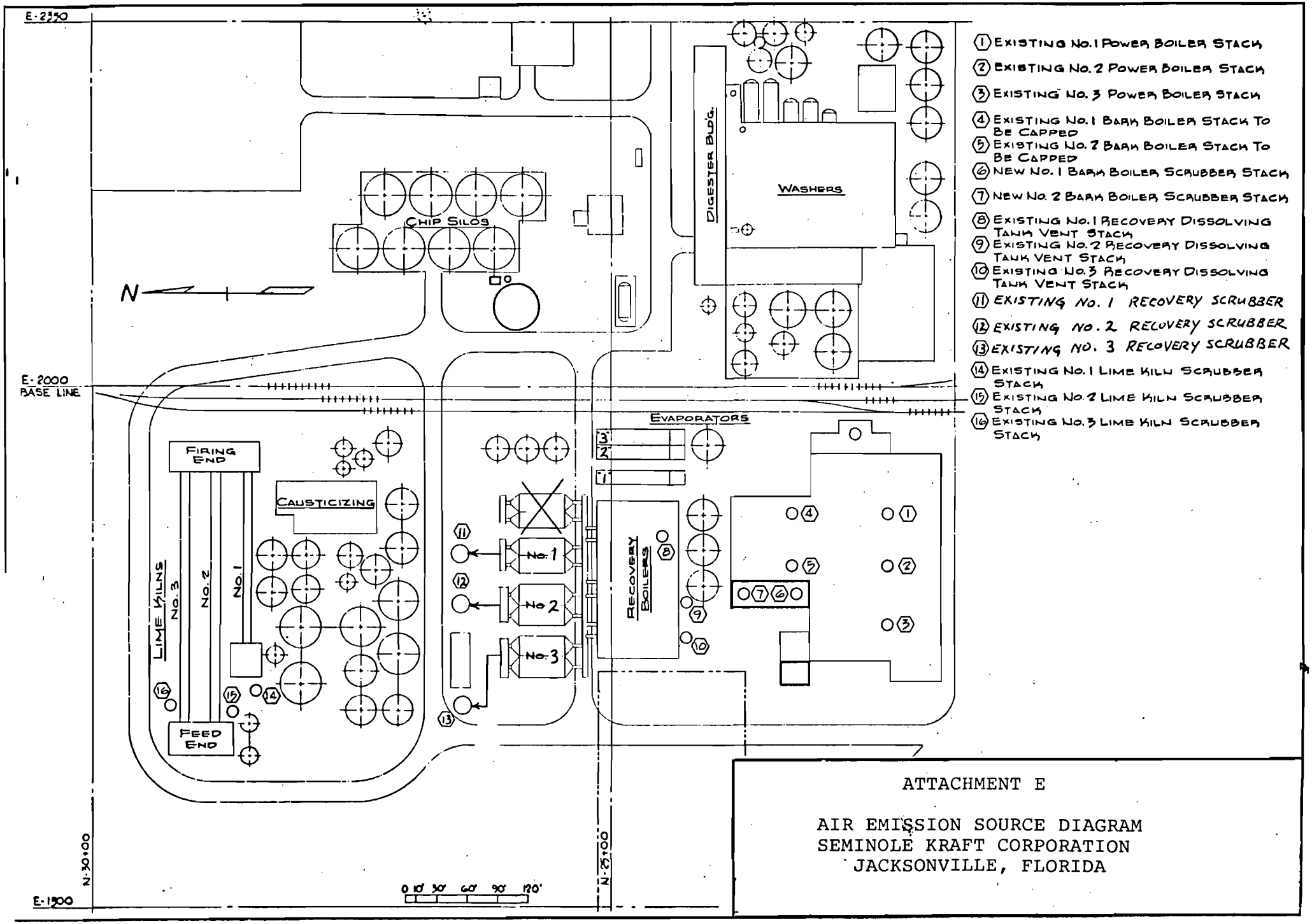
VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





ATTACHMENT D

FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;

2. Execution of permit applications as required for operation of the corporation's facilities; and

3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: _____
Vice President

Pd. $1000.00
Receipt #76193
V #9394
AC 16-141800

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

DER

NOV 12 1987

BAQM

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ERNEST F. FREY
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New[1] [x] Existing[1]

APPLICATION TYPE: [x] Construction [ ] Operation [ ] Modification

COMPANY NAME: Seminole Kraft Corporation 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) #2 Line Multi-Effect Evaporator

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.75 North 3365.60

Latitude 30 ° 25 ' 15 "N Longitude 81 ° 36 ' 00 "W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P. O. Box 26998, Jacksonville, Florida 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corporation

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: _____

T. Frank Lee, General Manager
Name and Title (Please Type)

Date: 11/11/87 Telephone No. 904/751-6400

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, tha

[1] See Florida Administrative Code Rule 17-2.100(57) and (104)

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.

MOAB

Signed John T. McKinnon P.E.

John T. McKinnon, P.E.
Name (Please Type)

Stone Container Corporation
Company Name (Please Type)

Suite 400, 2150 Parklake Drive, Atlanta, GA 30345
Mailing Address (Please Type)

Florida Registration No. 37697 Date: 11/11/87 Telephone No. 404/621-6709

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.

Attachment A

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

Start of Construction complete Completion of Construction complete

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.)

Hot well covers and vent stack tie-in = $30,000

(cost covers all three lines)

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

Draft Interim Operating Permit = AO16-116142

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr ____; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions. (Yes or No) NA

1. Is this source in a non-attainment area for a particular pollutant? _____

   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. _____

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

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

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

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

   a. If yes, for what pollutants? _____

   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.

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		
15% Black Liquor	NA	NA	450.000	19

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

1. Total Process Input Rate (lbs/hr): 450.000 lbs/hr @ 15% solids

2. Product Weight (lbs/hr): 135,000 lbs. /hr @ 50% solids

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[2] 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	
TRS	NA - Incinerated		in lime kilns		1,671,737	836	19

[1]See Section V, Item 2.

[2]Reference 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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

EPA 450/2-78-003b

$$727 \frac{\text{Ton Pulp}}{\text{Day}} \times \frac{6.3 \text{ lbs. TRS}}{\text{Ton Pulp}} \times \frac{365 \text{ days}}{\text{Year}} = 1{,}671{,}737 \frac{\text{lbs. TRS}}{\text{Year}} = 836 \frac{\text{Tons}}{\text{Year}}$$

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)
Incineration in Lime Kilns	TRS	100%	NA	See Attachment A

E. Fuels NA

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. NA

Annual Average _____ Maximum _____

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

Clean condensate to boiler feed water. Contaminated condensate from hot well to sewer for treatment in aeration basin.

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

Stack Height: See Lime Kilns ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION NA

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 Diamter: _____ 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:

See Attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Contaminated condensate from hot well to sewer for treatment in aeration basin.

Clean condensate returned to boiler feedwater.

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)]

   See Section III A

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.

   See Section III C and Attachment A

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

   See Section III

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.)

   See Attachment A

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).

   See Attachment A

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.

   See Attachment B

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).

   See Attachment C

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.

   See Attachments D & E

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 NA

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:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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 NA

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^2* _____ 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.

ATTACHMENT A

No.2 Line Multiple-Effect Evaporator Construction Permit Application

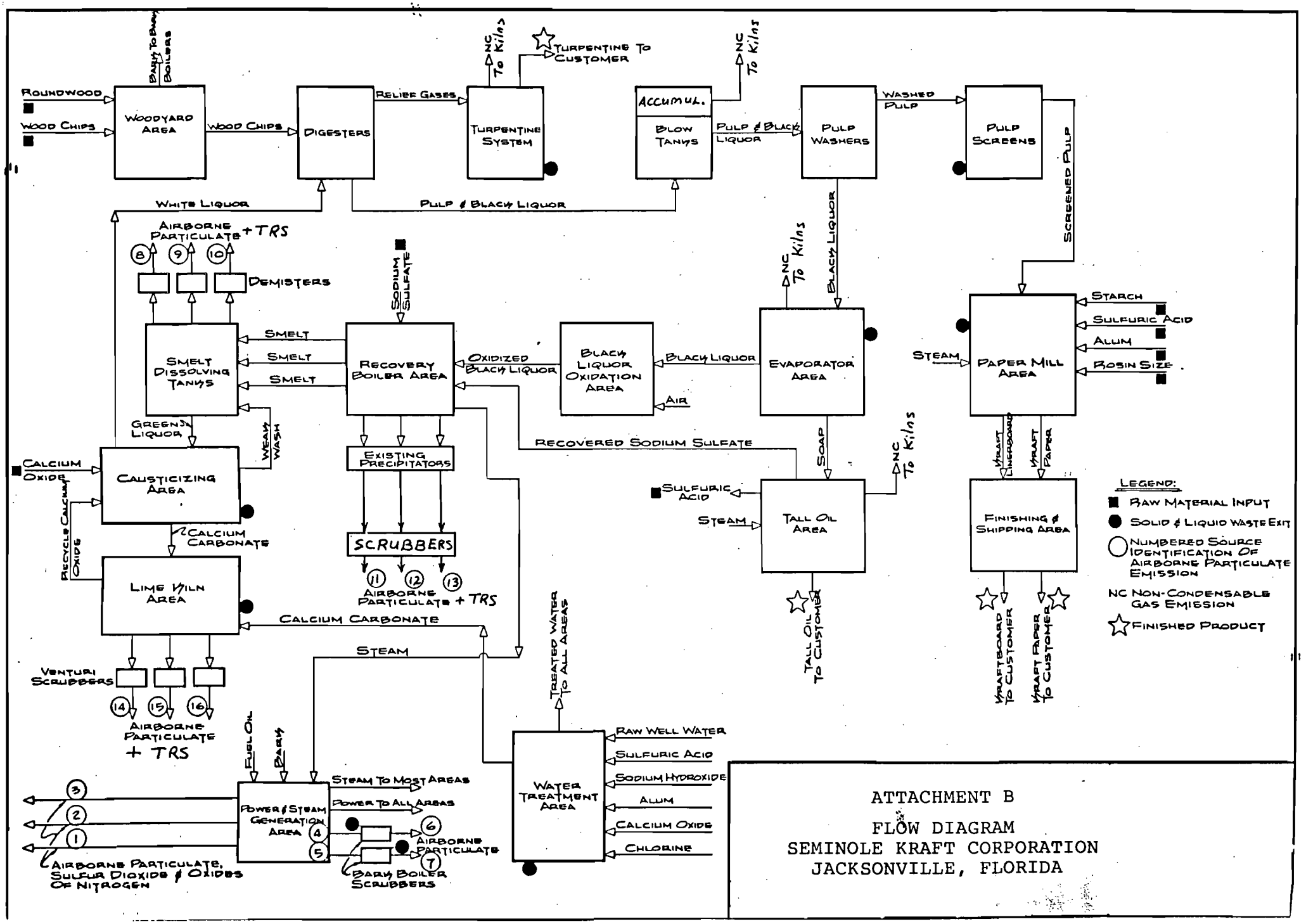
TRS emissions from multiple-effect evaporators are emitted from the condensate hotwells. The hotwell on No.2 Line multiple-effect evaporator was previously open to the atmosphere with no control of TRS.

This construction permit will cover the installation of a stainless steel sheet metal cover on the hotwell with a stack connected to the existing non-condensible gas collection (NCG) system. The cover and stack were installed first in order to analyze the TRS emissions. This was necessary to determine if the mass emission rate of TRS could safely be introduced into the NCG system for incineration in the lime kilns. The data indicated that this was feasible. Then, with the consent of Mr. Jerry Woosley of the Jacksonville BESD, the hotwell stack was tied into the NCG system (along with the hotwells from Numbers 1 and 3 lines multiple-effect evaporators) for a full-scale trial. The piping was installed in a manner which would allow it to be a permanent installation if the trial was successful.

The trial demonstrated that the TRS gasses from all three lines of multiple-effect evaporators may safely be collected in the existing NCG system and incinerated in the lime kilns. Therefore, this construction permit application is to cover the existing installation which is currently in operation.

The use of lime kilns to achieve complete destruction of TRS compounds is a recognized technology that is well documented. AS stated in EPA 450/3-83-017, "Review of New Source Performance Standards for Kraft Pulp Mills", incineration in lime kilns adequately achieves the 1200°F and 0.5 second retention time required to completely destroy TRS compounds. This is because a temperature of 1200°F or above is necessary to calcine the lime mud to CaO, and lime kilns (such as Seminole's) typically have at least two to three seconds of retention time. EPA further recognized this fact in their reviews of the standards for pulp mills (49 FR 2452 and 51 FR 18538), and deleted the requirement to monitor the lime kiln temperatures. Thus, it is appropriate to assume 100% destruction of all TRS compounds from the No.2 Line Multiple-Effect Evaporator in the lime kiln.

Since incineration in lime kilns is a specified control technology in 17-2.600(4)(c)(1)a, FAC, No.2 Line Multiple-Effect Evaporators is currently in compliance with the Florida TRS rule.

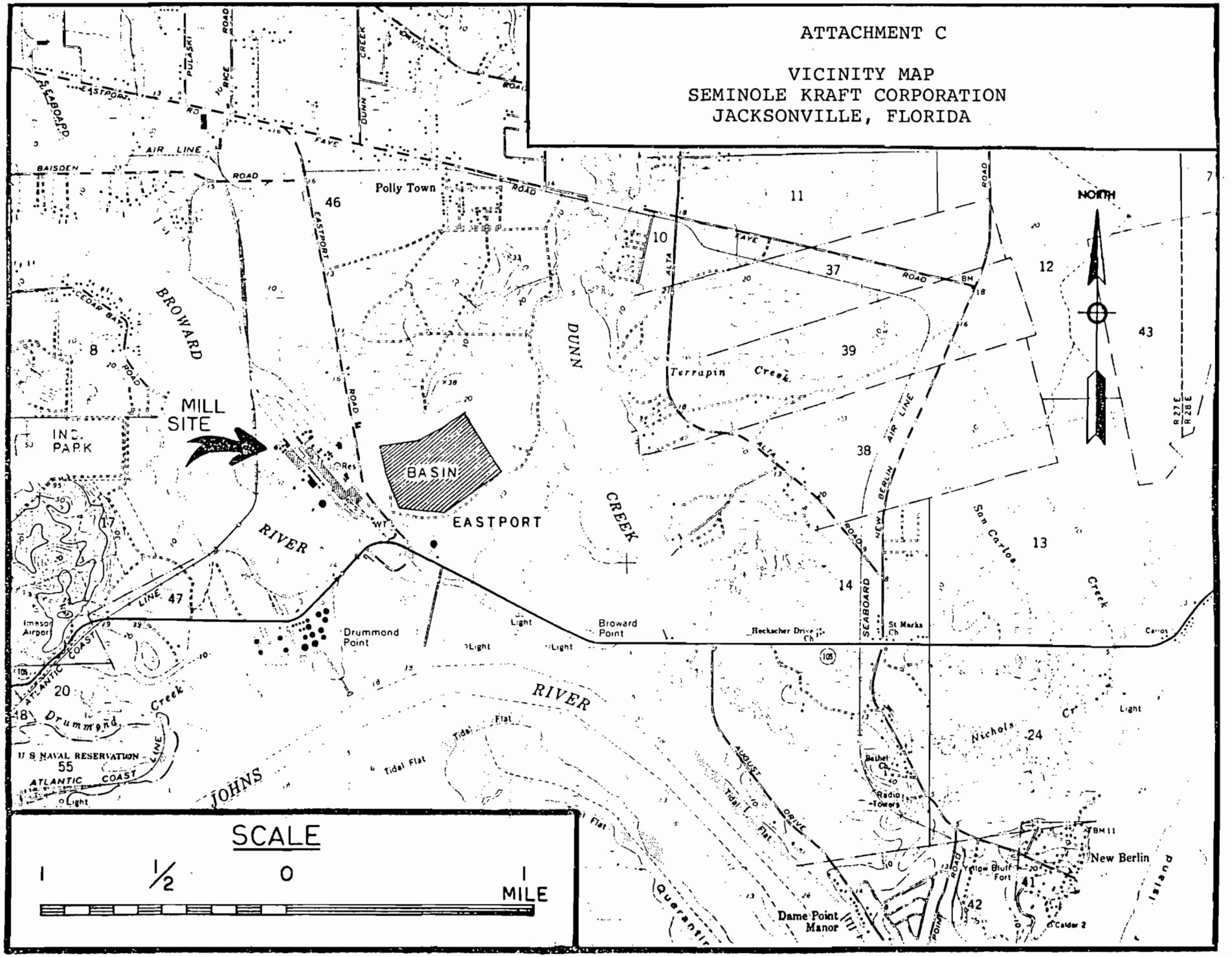


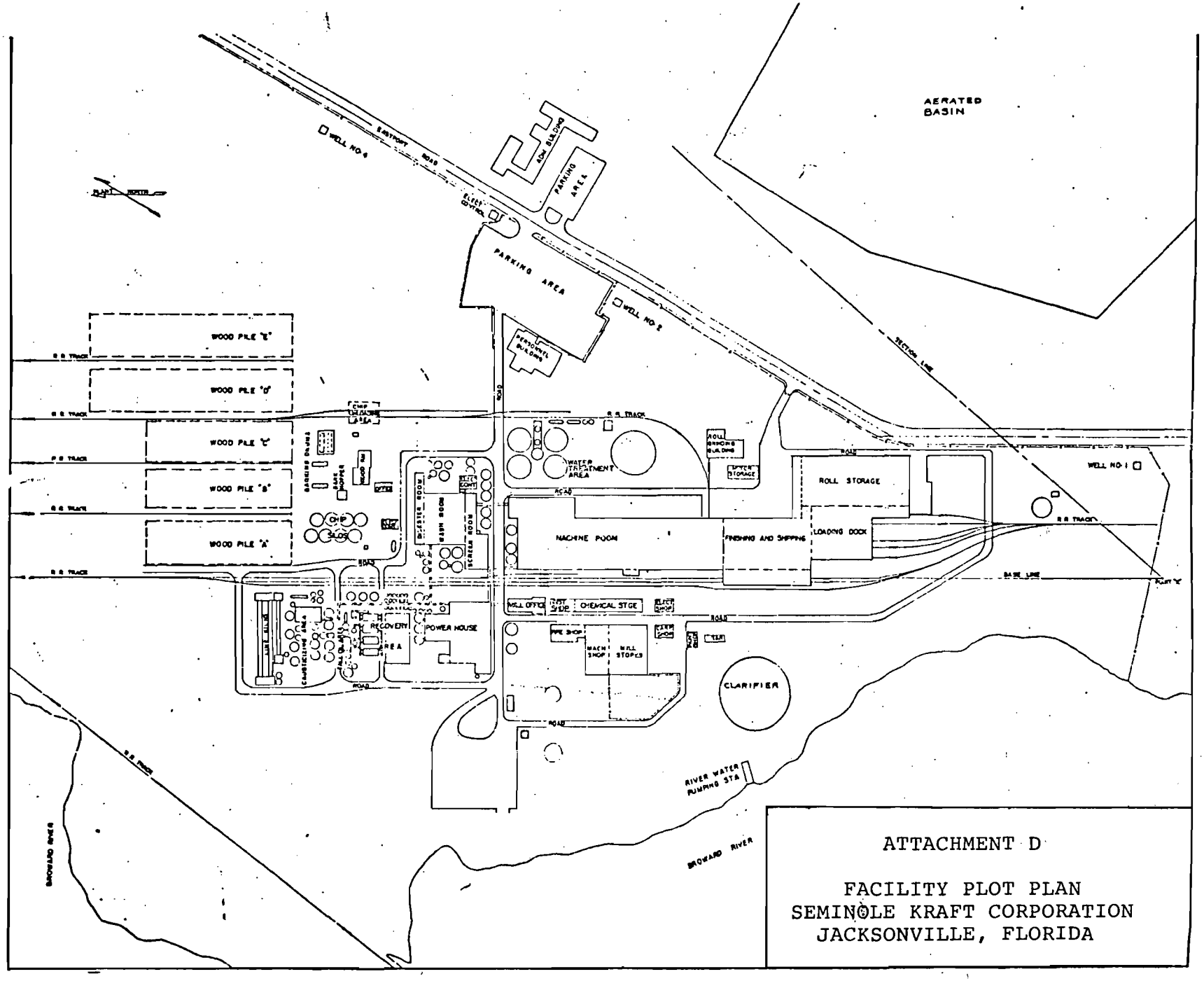
ATTACHMENT B

FLOW DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

ATTACHMENT C

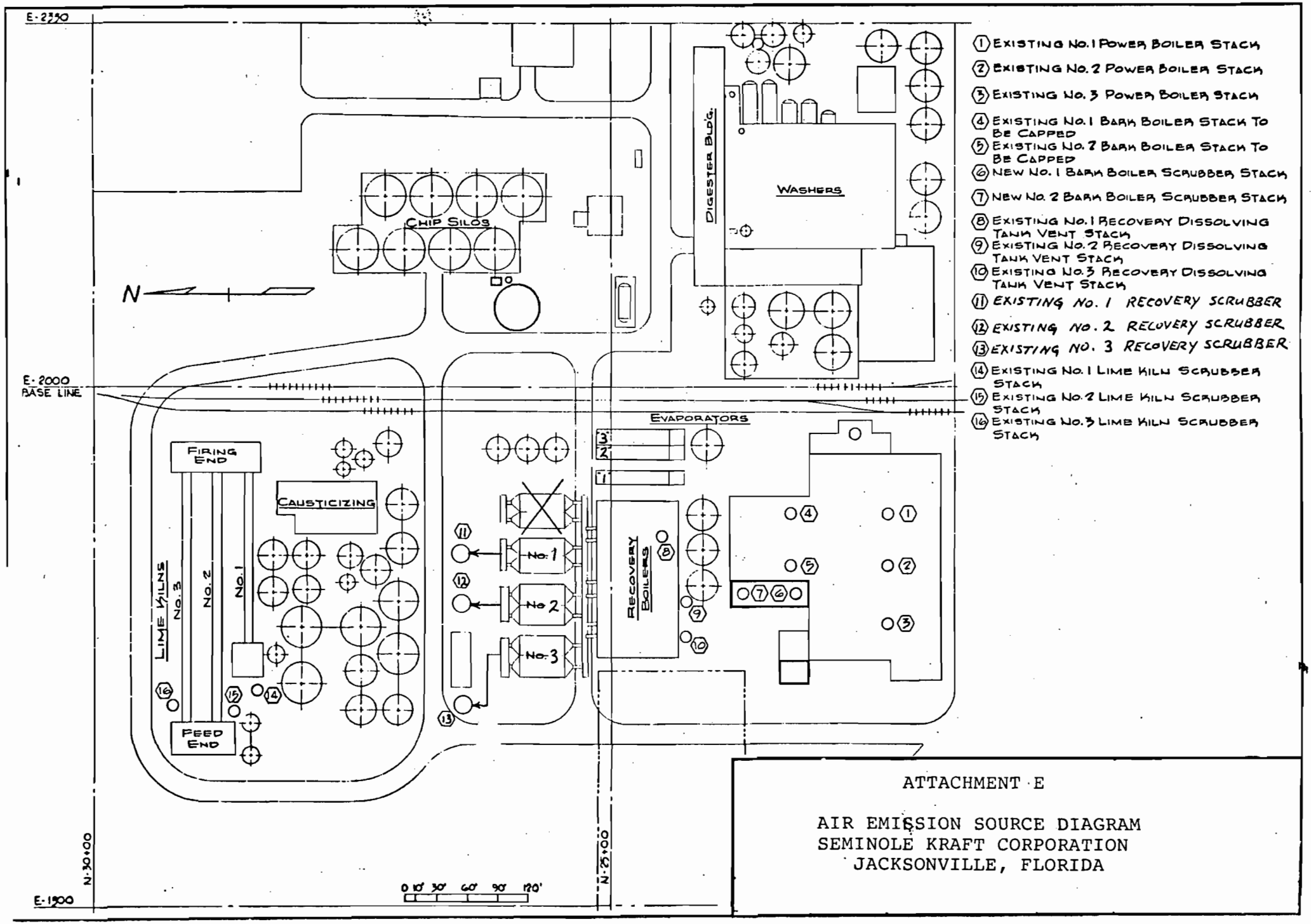
VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





ATTACHMENT D

FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;

2. Execution of permit applications as required for operation of the corporation's facilities; and

3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: _____
Vice President

Pd. $1000.00
Receipt # 76193
VH 9395
AC 16-141801

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

DER

NOV 12 1987

BAQM

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ERNEST F. FREY
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New[1] [X] Existing[1]

APPLICATION TYPE: [X] Construction [ ] Operation [ ] Modification

COMPANY NAME: Seminole Kraft Corporation 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) #3 Line Multi-Effect Evaporators

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.75 North 3365.60

Latitude 30 ° 25 ' 15 "N Longitude 81 ° 36 ' 00 "W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P. O. Box 26998, Jacksonville, Florida 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corporation

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: _____

T. Frank Lee, General Manager

Name and Title (Please Type)

Date: 11/11/87 Telephone No. 904/751-6400

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)

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 John T. McKinnon, P.E.

John T. McKinnon, P.E.
Name (Please Type)

Stone Container Corporation
Company Name (Please Type)

Suite 400, 2150 Parklake Drive, Atlanta, GA 30345
Mailing Address (Please Type)

Florida Registration No. 37697 Date: 11/11/87 Telephone No. 404/621-6709

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.

See Attachment A

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

Start of Construction complete Completion of Construction complete

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.)

Hot well covers and stack tie-in - $30,000

(Cost covers all three lines)

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

Draft Interim Operating Permit = A016-116143

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr_____; if seasonal, describe:_____

F. If this is a new source or major modification, answer the following questions. (Yes or No) NA

1. Is this source in a non-attainment area for a particular pollutant? _____

   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. _____

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

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

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

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

   a. If yes, for what pollutants?_____

   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.

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		
15% Black Liquor	NA	NA	450,000	20

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

1. Total Process Input Rate (lbs/hr): 450,000 lbs/hr @ 15% solids

2. Product Weight (lbs/hr): 135,000 lbs/hr. @ 50% solids

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[2] 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	
TRS	NA - Incinerated		in lime kiln		1,671,737	836	20

[1]See Section V, Item 2.

[2]Reference 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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

EPA 450/2-78-003 b

$$727 \frac{\text{tons pulp}}{\text{day}} \times \frac{6.3 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{365 \text{ days}}{\text{year}} = 1{,}671{,}737 \frac{\text{lbs. TRS}}{\text{year}} = 836 \frac{\text{tons}}{\text{year}}$$

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)
Incineration in Lime Kilns	TRS	~100%	NA	See Attachment A

E. Fuels NA

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. NA

Annual Average _____ Maximum _____

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

Clean condensate to boiler feedwater. Contaminated condensate from hot wells to sewer for treatment in aeration basin.

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

Stack Height: See Lime Kilns ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

NA

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 Diamter: _____ 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:

See Attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Contaminated condensate from hot well to sewer for treatment in aeration basin.

Clean condensate returned to boiler feedwater.

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)]

   See Section IIIA

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.

   See Section III C and Attachment A

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

   See Section III C

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.)

   See Attachment A

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).

   See Attachment A

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.

   See Attachment B

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).

   See Attachment C

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.

   See Attachments D & E

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 NA

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:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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 NA

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^2* _____ 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.

ATTACHMENT A

No.3 Line Multiple-Effect Evaporator Construction Permit Application

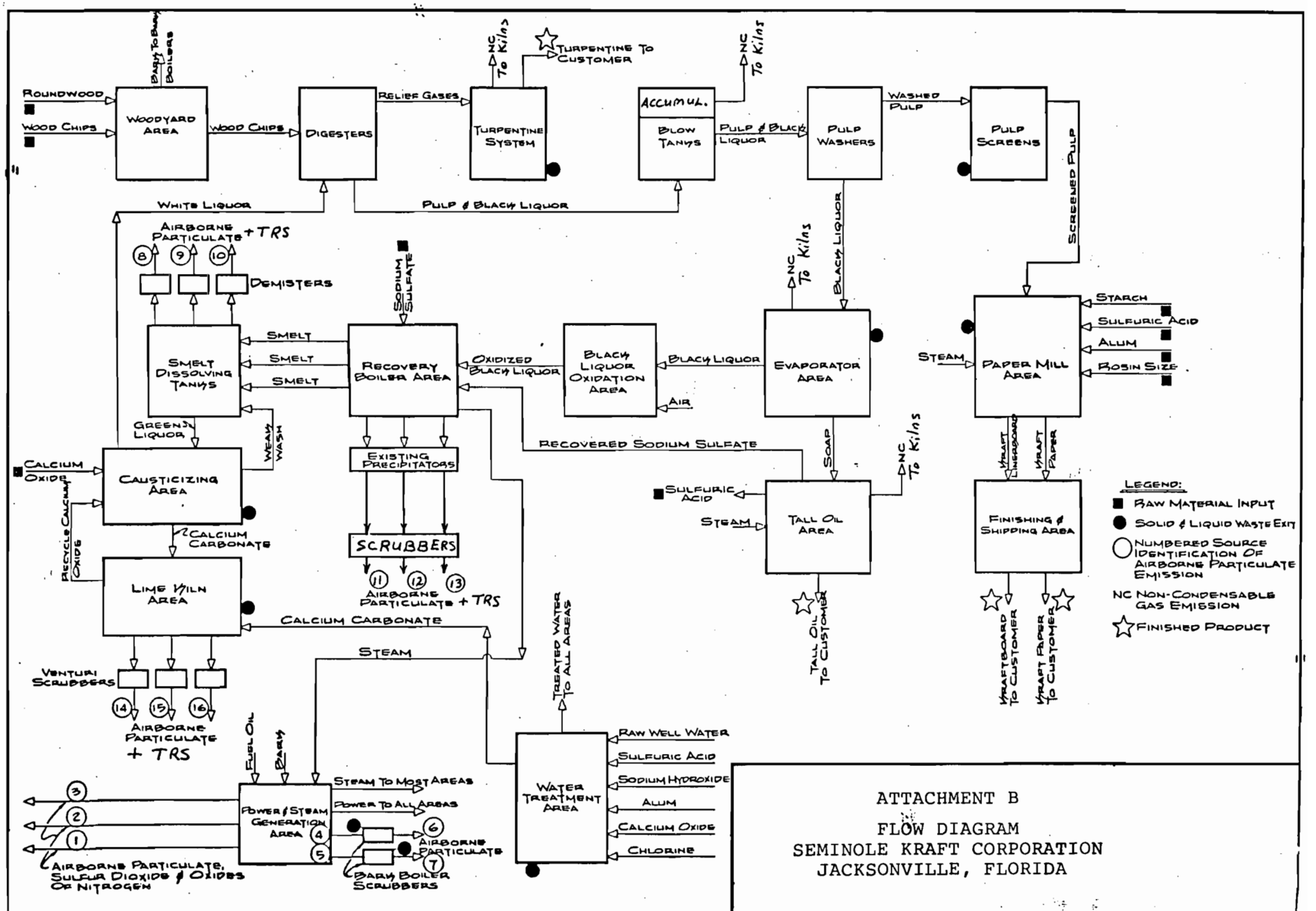
TRS emissions from multiple-effect evaporators are emitted from the condensate hotwells. The hotwell on No.3 Line multiple-effect evaporator was previously open to the atmosphere with no control of TRS.

This construction permit will cover the installation of a stainless steel sheet metal cover on the hotwell with a stack connected to the existing non-condensible gas collection (NCG) system. The cover and stack were installed first in order to analyze the TRS emissions. This was necessary to determine if the mass emission rate of TRS could safely be introduced into the NCG system for incineration in the lime kilns. The data indicated that this was feasible. Then, with the consent of Mr. Jerry Woosley of the Jacksonville BESD, the hotwell stack was tied into the NCG system (along with the hotwells from Numbers 1 and 2 lines multiple-effect evaporators) for a full-scale trial. The piping was installed in a manner which would allow it to be a permanent installation if the trial was successful.

The trial demonstrated that the TRS gasses from all three lines of multiple-effect evaporators may safely be collected in the existing NCG system and incinerated in the lime kilns. Therefore, this construction permit application is to cover the existing installation which is currently in operation.

The use of lime kilns to achieve complete destruction of TRS compounds is a recognized technology that is well documented. AS stated in EPA 450/3-83-017, "Review of New Source Performance Standards for Kraft Pulp Mills", incineration in lime kilns adequately achieves the 1200^{o}F and 0.5 second retention time required to completely destroy TRS compounds. This is because a temperature of 1200^{o}F or above is necessary to calcine the lime mud to CaO, and lime kilns (such as Seminole's) typically have at least two to three seconds of retention time. EPA further recognized this fact in their reviews of the standards for pulp mills (49 FR 2452 and 51 FR 18538), and deleted the requirement to monitor the lime kiln temperatures. Thus, it is appropriate to assume 100% destruction of all TRS compounds from the No.3 Line Multiple-Effect Evaporator in the lime kiln.

Since incineration in lime kilns is a specified control technology in 17-2.600(4)(c)(1)a, FAC, No.3 Line Multiple-Effect Evaporators is currently in compliance with the Florida TRS rule.



ATTACHMENT B

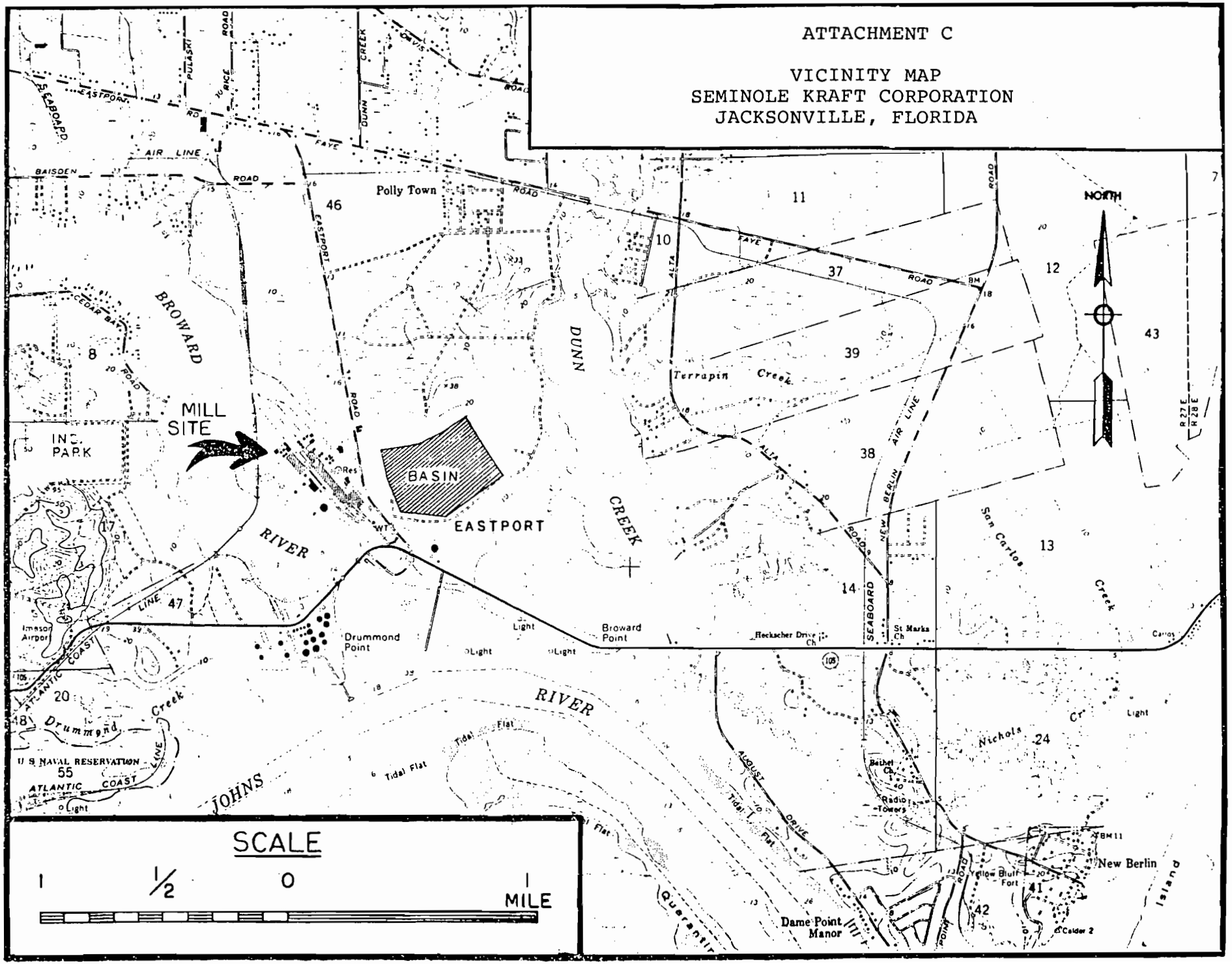
FLOW DIAGRAM

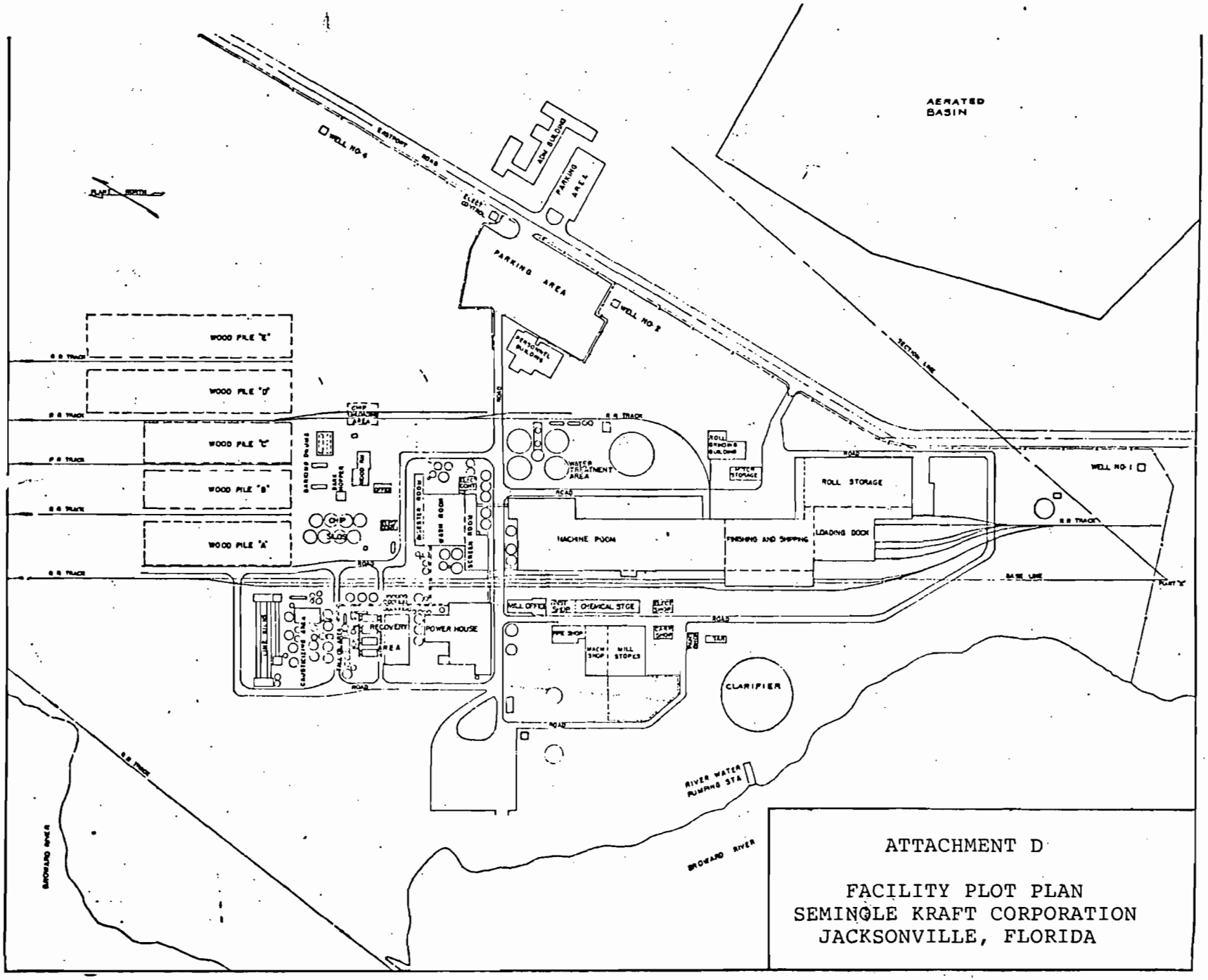
SEMINOLE KRAFT CORPORATION

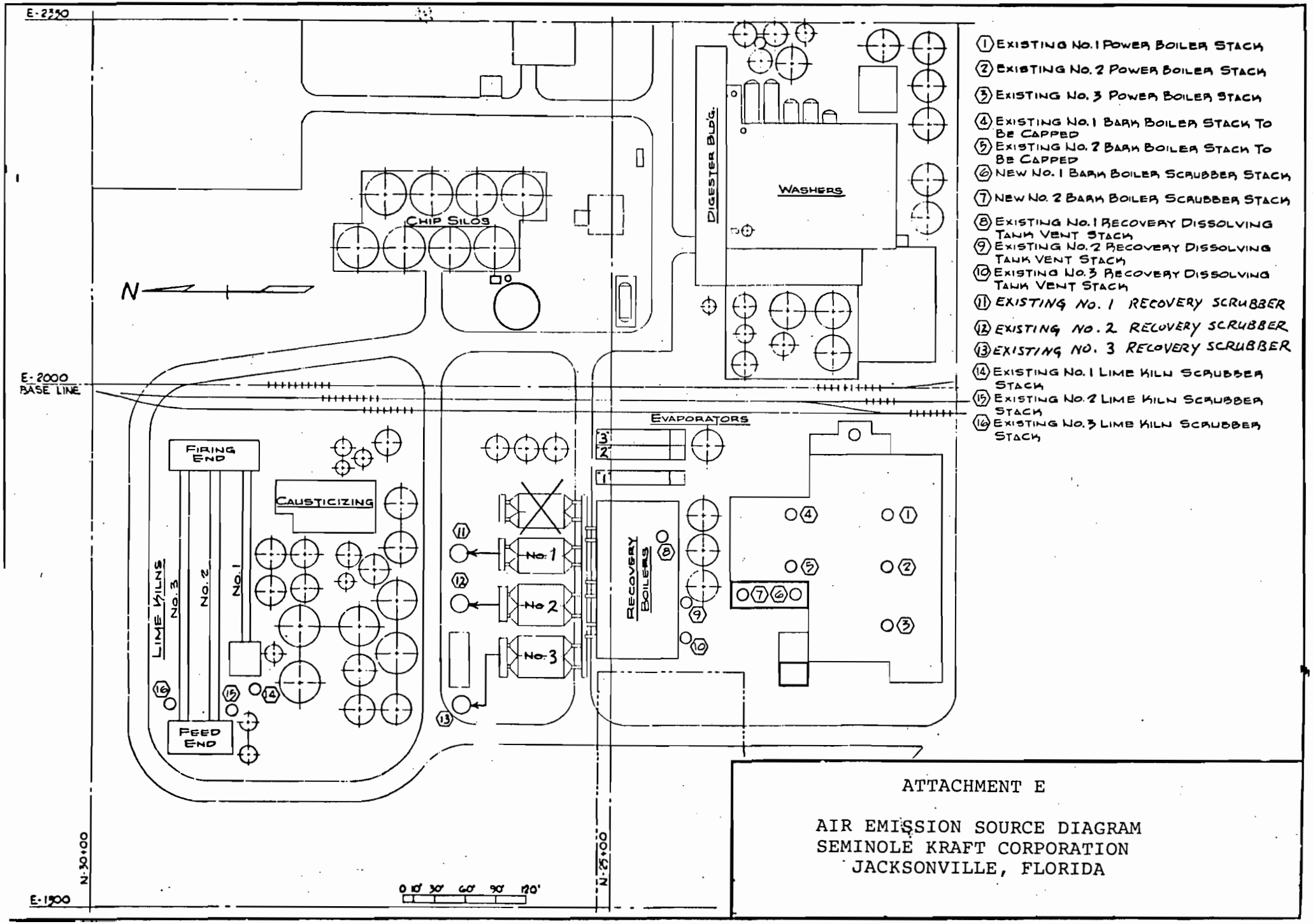
JACKSONVILLE, FLORIDA

ATTACHMENT C

VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA




AERATED BASIN
WELL NO 4
EASTPORT ROAD
ADM BUILDING
PARKING AREA
PARKING AREA
WELL NO 2
PERSONNEL BUILDING
SECTION LINE
WOOD PILE 'E'
WOOD PILE 'D'
WOOD PILE 'C'
WOOD PILE 'B'
WOOD PILE 'A'
R R TRACK
ROAD
WATER TREATMENT AREA
ROLL STORAGE
WELL NO 1
MACHINE ROOM
FINISHING AND SHIPPING
LOADING DOCK
MAIN LINE
PLANT 'A'
MILL OFFICE
CHEMICAL STOR
RECOVERY AREA
POWER HOUSE
MACH SHOP
MILL STORES
CLARIFIER
RIVER WATER PUMPING STA
BROWARD RIVER
ATTACHMENT D
FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;

2. Execution of permit applications as required for operation of the corporation's facilities; and

3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: _____
Vice President

Bruce

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

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. T. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Post Office Box 26998
Jacksonville, Florida 32218

May 12, 1988

Enclosed are permits Nos. AC 16-141790, 16-141792, 16-41793, 16-141798, 16-141799, 16-141800 and 16-141801, for Seminole Kraft Corporation (SKC) to make several changes at its existing facility in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2, which includes replacement of some existing equipment, addition of some existing and new equipment, and upgrading the existing noncondensible gas (NCG) handling system from various sources. The TRS gases will be incinerated in either the No. 2 or 3 Lime Kiln. The location of the proposed project will be at SKC's 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 32399-2400; 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.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

Copy furnished to:

B. Stewart, NE Dist.
B. Pittman, Esq.
C. Barton, SCC
J. McKinnon, P.E. SCC
K. Mehta, BESD
T. Cole, Esq.

Final Determination

Seminole Kraft Corporation
Duval County
Jacksonville, Florida

Construction Permit Nos. AC 16-141790
16-141792
16-141793
16-141798
16-141799
16-141800
16-141801

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

May 9, 1988

Final Determination

The construction permit applications and supplementary material have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Jacksonville Journal on April 13, 1988. The Technical Evaluation and Preliminary Determination were available for public inspection at the Duval County's Bio-Environmental Services Division (BESD) office and the DER's Bureau of Air Quality Mangement (Bureau) and Northeast District office.

Comments were received from Mr. Terry Cole, representing Seminole Kraft Corporation, on: April 14, 1988; April 14, 1988 revision; April 18, 1988; and, May 5, 1988. Comments were received from Mr. Curtis Barton, with Stone Container Corporation, via a conference phone call on May 4, 1988. The comments will be addressed on a per letter and conversation basis, and the Bureau's responses follow:

A. April 18, 1988 letter.

1. AC 16-141790:

Specific Conditions:

a. No. 3:

Response: The Bureau agrees with the request and the following will be changed:

From: The No. 6 Fuel Oil firing rate shall not exceed 400 gals/hr (60 MMBtu/hr heat input). The sulfur content of the fuel oil shall not exceed 2.3% by weight.

To: The No. 6 Fuel Oil firing rate shall not exceed 60 MMBtu/hr heat input. The sulfur content of the fuel oil shall not exceed 2.3% by weight.

b. No. 4:

Response: The Bureau agrees with the request and the following will be changed:

From: The maximum pollutant emissions shall not exceed:

a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
b) Visible Emissions (VE): 10% Opacity or less
c) TRS: 20 ppmvd @ standard conditions corrected to 10% O_2, as a 12-hr avg. (1.86 lbs/hr, 8.2 TPY)
d) SO_2: assumed to be zero for PSD tracking purposes

To: The maximum pollutant emissions shall not exceed:

a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
b) Visible Emissions (VE): 10% Opacity or less
c) TRS: 20 ppmvd @ standard conditions corrected to 10% O_2, as a 12-hr avg. (1.86 lbs/hr, 8.2 TPY)

c. No. 5:

Response: The Bureau agrees with the request and the following will be changed:

From: Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:

a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources

b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources

c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

To: Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 or other test methods previously approved by the Department and approved by the Department for this permit:

a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources
b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources

c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

d. No. 11:

Response: The Bureau agrees with the request along with the inclusion of the test method. Therefore, the following will be changed:

From: The No. 1 Lime Kiln shall be tested one-time only for SO_2 emissions to establish the overall removal efficiency of the lime kiln and its associated scrubber system. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate fee pursuant to FAC Rule 17-4, of which $1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

To: The No. 1 Lime Kiln shall be tested one-time only for SO_2 emissions to establish the level of SO_2 for PSD tracking purposes. The test shall be performed using EPA Method 6 in

accordance with FAC Rule 17-2.700(6)(b)6 or other approved test method approved by the Department and approved by the Department for this permit.

e. No. 13: 1st Paragraph

Response: The Bureau agrees with the request and the following will changed:

From: To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results and the Certificate of Completion, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. (FAC Rules 17-2 and 17-4)

To: To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results and the Certificate of Completion, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit in accordance with FAC Rules 17-2 and 17-4.

2. AC 16-141792 and AC 16-141793:

Specific Conditions:

a. No. 3:

Response: The Bureau agrees with the request and the following will be changed:

From: The No. 6 fuel oil firing rate shall not exceed 400 gals/hr (60 MMBtu/hr heat input). The sulfur content of the fuel oil shall not exceed 2.3% by weight.

To: The No. 6 fuel oil firing rate shall not exceed 60 MMBtu/hr heat input. The sulfur content of the fuel oil shall not exceed 2.3% by weight.

b. No. 4:

Response: The Bureau agrees with the request along with the change of "and" to "or" (based on a phone conversation with Mr. Millican on May 6, 1988). Therefore, the following will be changed:

1) AC 16-141792

From: The No. 2 Lime Kiln shall be an incineration device for TRS emissions from the Nos. 1 and 2 Batch Digester Systems and the Nos. 1, 2, and 3 Multiple Effect Evaporator Systems.

To: The No. 2 Lime Kiln or No. 3 Lime Kiln (AC 16-141793) shall be the incineration device for TRS emissions from the Nos. 1 and 2 Batch Digester Systems and the Nos. 1, 2, and 3 Multiple Effect Evaporator Systems.

2) AC 16-141793

From: The No. 3 Lime Kiln shall be an incineration device for TRS emissions from the Nos. 1 and 2 Batch Digester Systems and the Nos. 1, 2, and 3 Multiple Effect Evaporator Systems.

To: The No. 3 Lime Kiln or No. 2 Lime Kiln (AC 16-141792) shall be the incineration device for TRS emissions from the Nos. 1 and 2 Batch Digester Systems and the Nos. 1, 2, and 3 Multiple Effect Evaporator Systems.

c. No. 5:

Response: The Bureau agrees with the request and the following will be changed:

From: The maximum pollutant emissions shall not exceed:

a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
b) Visible Emissions (VE): 10% Opacity or less
c) TRS: 20 ppmvd @ standard conditions corrected to 10% O_2, as a 12-hr avg. (2.06 lbs/hr, 9.0 TPY)
d) SO_2: assumed to be zero for PSD tracking purposes

To: The maximum pollutant emissions shall not exceed:

a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
b) Visible Emissions (VE): 10% Opacity or less
c) TRS: 20 ppmvd @ standard conditions corrected to 10% O_2, as a 12-hr avg. (2.06 lbs/hr, 9.0 TPY)

d. No. 6:

Response: The Bureau agrees with the request and the following will be changed:

From: Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:

a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources

b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources
c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

To: Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 or other test methods previously approved by the Department and approved by the Department for this permit:

a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources
b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources
c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

e. No. 13:

Response: The Bureau agrees with the language except for the source citing. Specific source testing should be a requirement within the text of a source's permit. Also, the test method to be performed will be specified. Therefore, the following will be changed:

1) AC 16-141792

From: The No. 2 Lime Kiln shall be tested one-time only for SO_2 emissions to establish the overall removal efficiency of the lime kiln and its associated scrubber system. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate fee pursuant to FAC Rule 17-4, of which $1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

To: The No. 2 Lime Kiln shall be tested one-time only for SO_2 emissions for PSD tracking purposes. The test shall be performed using EPA Method 6 in accordance with FAC Rule 17-2.700(6)(b)6 or other test method previously approved by the Department and approved by the Department for this permit. The results will be used to assess the appropriate fee pursuant to FAC Rule 17-4, of which $1000.00 (more than 100 TPY potential pollutant emissions) has already been recieved.

2) AC 16-141793

From: the No. 3 Lime Kiln shall be tested one-time only for SO_2 emissions to establish the overall removal efficiency of the lime kiln and its associated scrubber system. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate fee pursuant to FAC Rule 17-4, of which $1000.00

(more than 100 TPY potential pollutant emissions) has already been received.

To: The No. 3 Lime Kiln shall be tested one-time only for SO_2 emissions for PSD tracking purposes. The test shall be performed using EPA Method 6 in accordance with FAC Rule 17-2.700(6)(b)6 or other test method previously approved by the Department and approved by the Department for this permit. The results will be used to assess the appropriate fee pursuant to FAC Rule 17-4, of which $1000.00 (more than 100 TPY potential pollutant emissions) has already been recieved.

f. No. 15: 1st Paragraph

Response: The Bureau agrees with the request and the following will be changed:

From: To obtain ã permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. (FAC Rules 17-2 and 17-4)

To: To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit in accordance with FAC Rules 17-2 and 17-4.

3. AC 16-141798:

Specific Conditions:

a. No. 2:

Response: See B.1. of the Final Determination.

b. No. 3:

Response: The Bureau agrees with the request and the following will be changed:

From: The Nos. 1 and 2 batch digester systems are subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule

17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O_2 as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

To: The Nos. 1 and 2 batch digester systems are subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.a., which requires combustion of the TRS gases in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O_2 as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

c. No. 8:

Response: The Bureau agrees with the request and the following will be changed:

From: Compliance tests using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be conducted if the permittee does not incinerate the TRS gases from the batch digester systems in the No. 2 or 3 Lime Kiln.

To: Compliance tests using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700, shall be conducted if the permittee does not incinerate the TRS gases from the batch digester systems in the No. 2 or 3 Lime Kiln.

d. No. 13: 1st Paragraph

Response: The Bureau agrees with the request and the following will be changed:

From: To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. (FAC Rules 17-2 and 17-4)

To: To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test

results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit in accordance with FAC Rules 17-2 and 17-4.

e. No. 15:

Response: The Bureau agrees with the request and the following will be changed:

From: The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) shall have a Specific Condition that the lime kilns are the pollution control devices for the batch digester systems.

To: The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) shall have a Specific Condition that the lime kilns are the TRS control devices for the batch digester systems.

4. AC 16-141799, AC 16-141800 and AC 16-141801:

Specific Conditions:

a. No. 2:

Response: See B.2. of the Final Determination

b. No. 3:

Response: The Bureau agrees with the language except for the source citing. Specific source citing should be contained in the text of a source's permit. Therefore, the following will be changed:

From: The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O_2 as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

To: The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.a., which requires combustion of the TRS gases in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O_2 as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

c. No. 7:

Response: The Bureau agrees with the request and the following will be changed:

From: In the event that a compliance test has to be performed on the MEE system for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used.

To: In the event that a compliance test has to be performed on the MEE system for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 shall be used.

d. No. 13: 1st Paragraph

Response: The Bureau agrees with the request and the following will be changed:

From: To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. (FAC Rules 17-2 and 17-4)

To: To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit in accordance with FAC Rules 17-2 and 17-4.

e. No. 15:

Response: The Bureau agrees with the request and the following will be changed:

1) AC 16-141799

From: The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the lime kilns are the pollution control devices for the No. 1 MEE system.

To: The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) or any succeeding permit shall have a Specific

Condition that the lime kilns are the TRS control devices for the No. 1 MEE system.

2) AC 16-141800

From: The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the lime kilns are the pollution control devices for the No. 2 MEE system.

To: The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the lime kilns are the TRS control devices for the No. 2 MEE system.

3) AC 16-141801

From: The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the lime kilns are the pollution control devices for the No. 3 MEE system.

From: The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the lime kilns are the TRS control devices for the No. 3 MEE system.

B. April 14, 1988 letter; revised April 14, 1988 letter; and, May 5, 1988 submittal.

Note: The revised April 14, 1988 letter supercedes the original April 14, 1988 letter, which will not be addressed. Also, the May 5, 1988 submittal supercedes part of the revised April 14, 1988 letter.

1. AC 16-141798:

Specific Condition:

a. No. 2:

Response: The Bureau agrees with the language contained in the May 5, 1988 response and the following will be changed:

From: The maximum production rate of the Nos. 1 and 2 batch digester systems shall not exceed 1987 TPD ADP (tons per day of air dried pulp and based on a nominal utilization rate of 580,000 lbs/hr wood chips (dry) and 898,000 lbs/hr of black/white liquor).

To:

2.a. For PSD purposes, the annual production rate of the Nos. 1 and 2 Batch Digester Systems will be 685,000 TPY ADP (tons per year, air dry pulp).

b. For NSPS purposes, the maximum production rate of the Nos. 1 and 2 Batch Digester Systems will be 120 TPH ADP (tons per hour, air dry pulp) and 1987 TPD ADP (tons per day, air dry pulp).

c. For testing purposes, the maximum production rate of the Nos. 1 and 2 Batch Digester Systems will be 82.8 TPH ADP (tons per hour, air dry pulp). Tests for compliance will be performed with the control device (No. 2 and 3 Lime Kiln) operating at 90-100% of maximum Lime Kiln operating rate and with digester systems 1 and 2 operating as near the maximum production rate as possible, but in no case shall the operating rate of the digesters be less than 85% of the maximum production rate.

2. AC 16-141799, AC 16-141800 and AC 16-141801:

Specific Condition:

a. No. 2:

Response: The Bureau does not agree with the language contained in the request. Based on a phone conversation with Mr. John Millcan on May 6, 1988, the term "NSPS" will be inserted into the beginning phrase "For testing, NSPS and PSD purposes, etc." Since the MEE systems are a continuous feed process, the Department expects the sources to be tested between 90-100% of their maximum process input rates. Therefore, the following will be changed:

1) AC 16-141799

From: The maximum total process input rate to the No. 1 MEE system shall not exceed 330,000 lbs/hr of black liquor (15% solids).

To: For testing, NSPS, and PSD purposes, the maximum total process input rate to the No. 1 MEE system will be 330,000 lbs/hr of black liquor (15% solids). Tests for compliance will be performed with the control device (No. 2 or 3 Lime Kiln) and the No. 1 MEE system operating at 90-100% of their maximum process input rates.

2) AC 16-141800

From: The maximum total process input rate to the No. 2 MEE system shall not exceed 450,000 lbs/hr of black liquor (15% solids).

To: For testing, NSPS, and PSD purposes, the maximum total process input rate to the No. 2 MEE system will be 450,000 lbs/hr of black liquor (15% solids). Tests for compliance will be performed with the control device (No. 2 or 3 Lime Kiln) and the No. 2 MEE system operating at 90-100% of their maximum process input rates.

3) AC 16-141801

From: The maximum total process input rate to the No. 3 MEE system shall not exceed 450,000 lbs/hr of black liquor (15% solids).

To: For testing, NSPS, and PSD purposes, the maximum total process input rate to the No. 3 MEE system will be 450,000 lbs/hr of black liquor (15% solids). Tests for compliance will be performed with the control device (No. 2 or 3 Lime Kiln) and the No. 3 MEE system operating at 90-100% of their maximum process input rates.

C. May 4, 1988 conference phone call.

Mr. Barton was concerned with the requirements contained in the Consent Order, OGC Case 86-1405, in the case of a revision. Mr. Clair Fancy assured Mr. Barton that, if any revision to the Consent Order does occur, the revision(s) will be incorporated into the appropriate source's construction permit through a permit amendment.

Attachments to be Incorporated:

A. AC 16-141790, -141792, and -141793

9. Mr. Terry Cole's letter dated April 18, 1988, and received April 19, 1988.

B. AC 16-141798

8. Mr. Terry Cole's letter dated April 14, 1988, and received April 14, 1988.
9. Mr. Terry Cole's revised letter dated April 14, 1988, and received April 14, 1988.
10. Mr. Terry Cole's letter dated April 18, 1988, and received April 19, 1988.
11. Mr. Terry Cole's submittal dated May 4, 1988, and received May 5, 1988.

C. AC 16-141799, -141800, and -141801

8. Mr. Terry Cole's letter dated April 14, 1988, and received April 14, 1988.
9. Mr. Terry Cole's letter revised April 14, 1988, and received April 14, 1988
10. Mr. Terry Cole's letter dated April 18, 1988, and received April 19, 1988.

The Bureau will incorporate the changes in the appropriate construction permits, as referenced above in the final determination. It is recommended that the construction permits be issued as drafted, with the above revisions and attachments incorporated.

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

PERMITTEE:
Seminole Kraft Corporation
P. O. Box 26998
Jacksonville, FL 32218-0998

Permit Number: AC 16-141790
Expiration Date: March 27, 1990
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: No. 1 Lime Kiln

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 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 permitting of the No. 1 Lime Kiln and the installation of a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up. The filter will be from the existing No. 3 Lime Kiln and is 8 feet in diameter and 10 feet long. The No. 1 Lime Kiln has a maximum lime production rate of 12,200 lbs CaO/hr (dry) and is based on a total process input rate of 24,000 lbs/hr lime mud (dry). The lime kiln uses No. 6 Fuel Oil with a maximum heat input of 60 MMBtu/hr. The source's control device is an existing wet scrubber system. The location of the project will be at the Seminole Kraft Corporation's existing facility in Jacksonville, Duval County, Florida. The UTM Coordinates are Zone 17, 744.18 km East and 3365.60 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry

A. Pulp and Paper Industry
   Major Group: 26 Sulfate (Kraft) Pulping
   o Lime Kiln 3-07-001-06
B. Mineral Products
   Major Group 32: Lime Manufacture
   o Calcining-Rotary Lime Kiln 3-05-016-04

The source shall be in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the Specific Conditions.

ATTACHMENTS

AC 16-141790

Attachments to be Incorporated:

1. Seminole Kraft's application package received November 12, 1987.
2. BESD's letter requesting additional information received December 10, 1987.
3. DER's incompleteness letter dated December 11, 1987.
4. NE District office's letter received January 4, 1988.
5. Seminole Kraft's response received January 26, 1988.
6. EPA's letter on NSPS guidelines dated October 23, 1987.
7. Bruce Mitchell's Interoffice Memo dated March 24, 1988.
8. Technical Evaluation and Preliminary Determination dated March 31, 1988.
9. Mr. Terry Cole's letter dated April 18, 1988, and received April 19, 1988.

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.

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.

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 noncompliance 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.

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 lime kiln may operate continuously, i.e., 8760 hrs/yr.

2. The maximum lime production rate shall not exceed 12,200 lbs CaO/hr (dry) and is based on a total process input rate of 24,000 lbs/hr lime mud (dry).

3. The No. 6 Fuel Oil firing rate shall not exceed 60 MMBtu/hr heat input. The sulfur content of the fuel oil shall not exceed 2.3% by weight.

SPECIFIC CONDITIONS:

4. The maximum pollutant emissions shall not exceed:

a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
b) Visible Emissions (VE): 10% Opacity or less
c) TRS: 20 ppmvd @ standard conditions corrected to 10% O_2, as a 12-hr average (1.86 lbs/hr, 8.2 TPY)

5. Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 or other test methods previously approved by the Department and approved by the Department for this permit:

a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources

b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources

c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

6. The lime kiln is subject to the provisions of FAC Rules 17-2.240: Circumvention, 17-2.250: Excess Emissions, 17-4.130: Plant Operations-Problems, 17-2.710(3)(b): Continuous Monitoring, 17-2.710(4): Quarterly Reporting Requirements, 17-4.140: Reports, and 17-2.971(1)(c): Compliance Schedules for Continuous Monitoring Requirements.

7. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive emissions.

8. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).

9. The lime kiln shall be in compliance with all applicable provisions of FAC Rules 17-2 and 17-4.

10. Pursuant to FAC Rule 17-2.960(1), Compliance Schedules, the lime kiln shall be in final compliance by November 12, 1989, and the permittee shall provide proof of final compliance to the Duval County's Bio-Environmental Services Division (BESD) office by December 27, 1989.

SPECIFIC CONDITIONS:

11. The No. 1 Lime Kiln shall be tested one-time only for SO_2 emissions to establish the level of SO_2 for PSD tracking purposes. The test(s) shall be performed using EPA Method 6 in accordance with FAC Rule 17-2.700(6)(b)6 or any other test method previously approved by the Department and approved by the Department for this permit.

12. The BESD office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the BESD office within 45 days of test completion.

13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results and the Certificate of Completion, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit in accordance with FAC Rules 17-2 and 17-4.

If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct. (FAC Rule 17-4)

14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to the DER's Bureau of Air Quality Management office and the BESD office.

Issued this 10 day of May, 1988.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann

Dale Twachtmann, Secretary

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

PERMITTEE:
Seminole Kraft Corporation
P. O. Box 26998
Jacksonville, FL 32218-0998

Permit Number: AC 16-141792
Expiration Date: March 27, 1990
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: No. 2 Lime Kiln

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 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 permitting of the No. 2 Lime Kiln and the installation of a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up. The new filter will be 8 feet in diameter and 14 feet long. The No. 2 Lime Kiln has a maximum lime production rate of 16,300 lbs CaO/hr (dry) and is based on a total process input rate of 32,000 lbs/hr lime mud (dry). The lime kiln uses No. 6 Fuel Oil with a maximum heat input of 60 MMBtu/hr. The source's control device is an existing wet scrubber system. The location of the project will be at the Seminole Kraft Corporation's existing facility in Jacksonville, Duval County, Florida. The UTM Coordinates are Zone 17, 744.18 km East and 3365.60 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry

A. Pulp and Paper Industry
   Major Group: 26 Sulfate (Kraft) Pulping
   o Lime Kiln 3-07-001-06
B. Mineral Products
   Major Group 32: Lime Manufacture
   o Calcining-Rotary Lime Kiln 3-05-016-04

The source shall be in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the Specific Conditions.

ATTACHMENTS

AC 16-141792

Attachments to be Incorporated:

1. Seminole Kraft's application package received November 12, 1987.
2. BESD's letter requesting additional information received December 10, 1987.
3. DER's incompleteness letter dated December 11, 1987.
4. NE District office's letter received January 4, 1988.
5. Seminole Kraft's response received January 26, 1988.
6. EPA's letter on NSPS guidelines dated October 23, 1987.
7. Bruce Mitchell's Interoffice Memo dated March 24, 1988.
8. Technical Evaluation and Preliminary Determination dated March 31, 1988.
9. Mr. Terry Cole's letter dated April 18, 1988, and received April 19, 1988.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141792
Expiration Date: March 27, 1990

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.

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.

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 noncompliance 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.

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 lime kiln may operate continuously, i.e., 8760 hrs/yr.

2. The maximum lime production rate shall not exceed 16,300 lbs CaO/hr (dry) and is based on a total process input rate of 32,000 lbs/hr lime mud (dry).

3. The No. 6 fuel oil firing rate shall not exceed 60 MMBtu/hr heat input. The sulfur content of the fuel oil shall not exceed 2.3% by weight.

SPECIFIC CONDITIONS:

4. The No. 2 Lime Kiln or the No. 3 Lime Kiln (AC 16-141793) shall be the incineration device for TRS emissions from the Nos. 1 and 2 Batch Digester Systems and the Nos. 1, 2, and 3 Multiple Effect Evaporator Systems.

5. The maximum pollutant emissions shall not exceed:

a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
b) Visible Emissions (VE): 10% Opacity or less
c) TRS: 20 ppmvd @ standard conditions corrected to 10% O_2, as a 12-hr average (1.95 lbs/hr, 8.5 TPY)

6. Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 or other test methods previously approved by the Department and approved by the Department for this permit:

a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources
b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources
c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

7. The lime kiln is subject to the provisions of FAC Rules 17-2.240: Circumvention, 17-2.250: Excess Emissions, 17-4.130: Plant Operations-Problems, 17-2.710(3)(b): Continuous Monitoring, 17-2.710(4): Quarterly Reporting Requirements, 17-4.140: Reports, and 17-2.971(1)(c): Compliance Schedules for Continuous Monitoring Requirements.

8. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive emissions.

9. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).

10. The lime kiln shall be in compliance with all applicable provisions of FAC Rules 17-2 and 17-4.

11. Pursuant to FAC Rule 17-2.960(1), Compliance Schedules, the lime kiln shall be in final compliance by November 12, 1989, and the permittee shall provide proof of final compliance to the Duval County's Bio-Environmental Services Division (BESD) office by December 27, 1989.

12. The No. 2 Lime Kiln is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

SPECIFIC CONDITIONS:

13. The No. 2 Lime Kiln shall be tested one-time only for SO_2 emissions to establish the level of SO_2 for PSD tracking purposes. The test(s) shall be performed using EPA Method 6 in accordance with FAC Rule 17-2.700(6)(b)6 or other test methods previously approved by the Department and approved by the Department for this permit. The results will be used to assess the appropriate fee pursuant to FAC Rule 17-4, of which $1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

14. The BESD office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the BESD office within 45 days of test completion.

15. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit in accordance with FAC Rules 17-2 and 17-4.

If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct. (FAC Rule 17-4)

16. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to the DER's Bureau of Air Quality Management office and the BESD office.

Issued this 10 day of May, 1988.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann

Dale Twachtmann, Secretary

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

PERMITTEE:
Seminole Kraft Corporation
P. O. Box 26998
Jacksonville, FL 32218-0998

Permit Number: AC 16-141793
Expiration Date: March 27, 1990
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: No. 3 Lime Kiln

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 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 permitting of the No. 3 Lime Kiln and the installation of a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up. The new filter will be 10 feet in diameter and 14 feet long. The No. 3 Lime Kiln has a maximum lime production rate of 16,300 lbs CaO/hr (dry) and is based on a total process input rate of 32,000 lbs/hr lime mud (dry). The lime kiln uses No. 6 Fuel Oil with a maximum heat input of 60 MMBtu/hr. The source's control device is an existing scrubber system. The location of the project will be at the Seminole Kraft Corporation's existing facility in Jacksonville, Duval County, Florida. The UTM Coordinates are Zone 17, 744.18 km East and 3365.60 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry

A. Pulp and Paper Industry
   Major Group: 26 Sulfate (Kraft) Pulping
   o Lime Kiln 3-07-001-06
B. Mineral Products
   Major Group 32: Lime Manufacture
   o Calcining-Rotary Lime Kiln 3-05-016-04

The source shall be in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the Specific Conditions.

ATTACHMENTS

AC 16-141793

Attachments to be Incorporated:

1. Seminole Kraft's application package received November 12, 1987.
2. BESD's letter requesting additional information received December 10, 1987.
3. DER's incompleteness letter dated December 11, 1987.
4. NE District office's letter received January 4, 1988.
5. Seminole Kraft's response received January 26, 1988.
6. EPA's letter on NSPS guidelines dated October 23, 1987.
7. Bruce Mitchell's Interoffice Memo dated March 24, 1988.
8. Technical Evaluation and Preliminary Determination dated March 31, 1988.
9. Mr. Terry Cole's letter dated April 18, 1988, and received April 19, 1988.

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.

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.

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 noncompliance 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.

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 lime kiln may operate continuously, i.e., 8760 hrs/yr.

2. The maximum lime production rate shall not exceed 16,300 lbs CaO/hr (dry) and is based on a total process input rate of 32,000 lbs/hr lime mud (dry).

3. The No. 6 fuel oil firing rate shall not exceed 60 MMBtu/hr heat input. The sulfur content of the fuel oil shall not exceed 2.3% by weight.

SPECIFIC CONDITIONS:

4. The No. 3 Lime Kiln or the No. 2 Lime Kiln (AC 16-141792) shall be the incineration device for TRS emissions from the Nos. 1 and 2 Batch Digester Systems and the Nos. 1, 2, and 3 Multiple Effect Evaporator Systems.

5. The maximum pollutant emissions shall not exceed:

a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
b) Visible Emissions (VE): 10% Opacity or less
c) TRS: 20 ppmvd @ standard conditions corrected to 10% O_2, as a 12-hr average (2.06 lbs/hr, 9.0 TPY)

6. Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 or other test methods previously approved by the Department and approved by the Department for this permit:

a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources
b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources
c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

7. The lime kiln is subject to the provisions of FAC Rules 17-2.240: Circumvention, 17-2.250: Excess Emissions, 17-4.130: Plant Operations-Problems, 17-2.710(3)(b) Continuous Monitoring, 17-2.710(4): Quarterly Reporting Requirements, 17-4.140: Reports, and 17-2.971(1)(c): Compliance Schedules for Continuous Monitoring Requirements.

8. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive emissions.

9. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).

10. The lime kiln shall be in compliance with all applicable provisions of FAC Rules 17-2 and 17-4.

11. Pursuant to FAC Rule 17-2.960(1), Compliance Schedules, the lime kiln shall be in final compliance by November 12, 1989, and the permittee shall provide proof of final compliance to the Duval County's Bio-Environmental Services Division (BESD) office by December 27, 1989.

12. The No. 3 Lime Kiln is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

SPECIFIC CONDITIONS:

13. The No. 3 Lime Kiln shall be tested one-time only for SO_2 emissions to establish the level of SO_2 for PSD tracking purposes. The tests shall be performed using EPA Method 6 in accordance with FAC Rule 17-2.700(6)(b)6 or other test methods previously approved by the Department and approved by the Department for this permit. The results will be used to assess the appropriate fee pursuant to FAC Rule 17-4, of which $1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

14. The BESD office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the BESD office within 45 days of test completion.

15. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit in accordance with FAC Rules 17-2 and 17-4.

If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct. (FAC Rule 17-4)

16. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to the DER's Bureau of Air Quality Management office and the BESD office.

Issued this 10 day of May, 1988.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

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

PERMITTEE:
Seminole Kraft Corp.
P. O. Box 26998
Jacksonville, FL
32218-0998

Permit Number: AC 16-141798
Expiration Date: September 24, 1989
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: Nos. 1 and 2 Batch Digester Systems

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 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 permitting of the batch digester systems (Nos. 1 and 2) and the upgrading of the noncondensible gas (NCG) handling system to capture and deliver pollutant emissions to the No. 2 or 3 Lime Kiln for incineration. The existing batch digester systems consist of batch digesters, blow tanks, and a turpentine recovery system. A new computerized control system will be installed. The maximum total daily pulp production will be 1987 TPD ADP (tons per day of air dried pulp). The location of the project will be at the permittee's existing facility in Jacksonville, Duval County, Florida. The UTM coordinates are Zone 17, 744.2 km East and 3365.6 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Batch Digester System 3-07-001-01

Construction will be in accordance with the permit application, plans, documents, and reference materials submitted unless otherwise stated in the General and Specific Conditions.

ATTACHMENTS

AC 16-141798

Attachments to be Incorporated:

1. Seminole Kraft's application package received November 12, 1987.
2. BESD's letter requesting additional information received December 10, 1987.
3. DER's incompleteness letter dated December 11, 1987.
4. NE District office's letter received January 4, 1988.
5. Seminole Kraft's response received January 26, 1988.
6. EPA's letter on NSPS guidelines dated October 23, 1987.
7. Technical Evaluation and Preliminary Determination dated March 31, 1988.
8. Mr. Terry Cole's letter dated April 14, 1988, and received April 14, 1988.
9. Mr. Terry Cole's revised letter dated April 14, 1988, and received April 14, 1988.
10. Mr. Terry Cole's letter dated April 18, 1988, and received April 19, 1988.
11. Mr. Terry Cole's submittal dated May 4, 1988, and received May 5, 1988.

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.

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.

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 noncompliance 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.

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 Nos. 1 and 2 batch digester systems may operate continuously, i.e. 8760 hours/year.

2.a. For PSD purposes, the annual production rate of the Nos. 1 and 2 Batch Digester Systems will be 685,000 TPY ADP (tons per year, air dry pulp).

b. For NSPS purposes, the maximum production rate of the Nos. 1 and 2 will be 120 TPH ADP (tons per hour, air dry pulp) and 1987 TPD ADP (tons per day, air dry pulp).

c. For testing purposes, the maximum production rate of the

SPECIFIC CONDITIONS:

Nos. 1 and 2 batch digester systems will be 82.8 TPH ADP (tons per hour, air dry pulp). Tests for compliance will be performed with the control device (No. 2 or 3 Lime Kiln) operating at 90-100% of the maximum lime kiln operating rate and with digester systems 1 and 2 operating as near the maximum production rate as possible, but in no case shall the operating rate of the digesters be less than 85% of the maximum production rate.

3. The Nos. 1 and 2 batch digester systems are subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.a., which requires combustion of the TRS gases in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O_2 as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

4. The batch digester systems are subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

5. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).

6. The batch digester systems are subject to the provisions of FAC Rules 17-2.240: Circumvention, 17-2.250: Excess Emissions, and 17-4.130: Plant Operation-Problems.

7. The batch digester systems are subject to the provisions of FAC Rules 17-2.710(4): Quarterly Reporting Requirements, and 17-4.140: Reports.

8. Compliance tests using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700, shall be conducted if the permittee does not incinerate the TRS gases from the batch digester systems in the No. 2 or 3 Lime Kiln.

9. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

10. Pursuant to FAC Rule 17-2.960(1), the batch digester systems shall be in final compliance by May 12, 1989, and the permittee shall provide proof of final compliance to the Duval County's Bio-Environmental Services Division (BESD) office by June 26, 1989, unless otherwise restricted by Consent Order, OGC Case No. 86-1405.

SPECIFIC CONDITIONS:

11. The Nos. 1 and 2 batch digester systems shall be in compliance with all applicable provisions in FAC Rules 17-2 and 17-4.

12. The BESD office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the BESD office within 45 days of test completion.

13. 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, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit in accordance with FAC Rules 17-2 and 17-4.

If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct. (FAC Rule 17-4)

14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to DER's Bureau of Air Quality Management office and BESD office.

15. The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) shall have a Specific Condition that the lime kilns are the TRS control devices for the batch digester systems.

16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO_2 emissions. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which $1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-141798
Expiration Date: September 24, 1989

Issued this 11th day of May,
1988.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

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

PERMITTEE:
Seminole Kraft Corp.
P. O. Box 26998
Jacksonville, FL
32218-0998

Permit Number: AC 16-141799
Expiration Date: September 24, 1989
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: No. 1 Multiple Effect Evaporator System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 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 permitting of the No. 1 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s), concentrator(s) and the new noncondensible gas (NCG) handling system constructed to collect and transport all of the NCG emissions from the MEE System to the No. 2 or 3 Lime Kiln for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 744.2 km East and 3365.6 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o MEE System 3-07-001-03

Construction will be in accordance with the permit application, plans, documents, and reference materials submitted unless otherwise stated in the General and Specific Conditions.

ATTACHMENTS

AC 16-141799

Attachments to be Incorporated:

1. Seminole Kraft's application package received November 12, 1987.
2. BESD's letter requesting additional information received December 10, 1987.
3. DER's incompleteness letter dated December 11, 1987.
4. NE District office's letter received January 4, 1988.
5. Seminole Kraft's response received January 26, 1988.
6. EPA's letter on NSPS guidelines dated October 23, 1987.
7. Technical Evaluation and Preliminary Determination dated March 31, 1988.
8. Mr. Terry Cole's letter dated April 14, 1988, and received April 14, 1988.
9. Mr. Terry Cole's revised letter dated April 14, 1988, and received April 14, 1988.
10. Mr. Terry Cole's letter dated April 18, 1988, and received April 19, 1988.

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.

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.

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 noncompliance 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.

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 No. 1 MEE system may operate continuously, i.e., 8760 hours/year.

2. For testing, NSPS, and PSD purposes, the maximum process input rate to the No. 1 MEE system will be 330,000 lbs/hr of black liquor (15% solids). Tests for compliance will be performed with the control device (No. 2 or 3 Lime Kiln) and the No. 1 MEE system operating at 90-100% of their maximum process input rates.

SPECIFIC CONDITIONS:

3. The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.a., which requires combustion of the TRS gases in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O_2 as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

4. The MEE system is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

5. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

6. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).

7. In the event that a compliance test has to be performed on the MEE system for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 shall be used.

8. Pursuant to the Consent Order, OGC Case No. 86-1405, the MEE system shall be in final compliance by August 12, 1988, and the permittee shall provide proof of final compliance to the Duval County's Bio-Environmental Services Division (BESD) office by September 26, 1988.

9. The MEE system shall be in compliance with all applicable provisions of FAC Rules 17-2 and 17-4.

10. The MEE system is subject to the provisions of FAC Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.

11. The MEE system is subject to the provisions of FAC Rules 17-2.710(4): Quarterly Reporting Requirements; and, 17-4.140: Reports.

12. The BESD office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the BESD office within 45 days of test completion.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-141799
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit in accordance with FAC Rules 17-2 and 17-4.

If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct. (FAC Rule 17-4)

14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to DER's Bureau of Air Quality Management office and the BESD office.

15. The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the lime kilns are the TRS control devices for the No. 1 MEE system.

16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO_2 emissions. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which $1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

Issued this 10 day of May, 1988.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann

Dale Twachtmann, Secretary

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

PERMITTEE:
Seminole Kraft Corp.
P. O. Box 26998
Jacksonville, FL
32218-0998

Permit Number: AC 16-141800
Expiration Date: September 24, 1989
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: No. 2 Multiple Effect Evaporator System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 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 permitting of the No. 2 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s), concentrator(s) and the new noncondensible gas (NCG) handling system constructed to collect and transport all of the NCG emissions from the MEE System to the No. 2 or 3 Lime Kiln for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 744.2 km East and 3365.6 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o MEE System 3-07-001-03

Construction will be in accordance with the permit application, plans, documents, and reference materials submitted unless otherwise stated in the General and Specific Conditions.

ATTACHMENTS

AC 16-141800

Attachments to be Incorporated:

1. Seminole Kraft's application package received November 12, 1987.
2. BESD's letter requesting additional information received December 10, 1987.
3. DER's incompleteness letter dated December 11, 1987.
4. NE District office's letter received January 4, 1988.
5. Seminole Kraft's response received January 26, 1988.
6. EPA's letter on NSPS guidelines dated October 23, 1987.
7. Technical Evaluation and Preliminary Determination dated March 31, 1988.
8. Mr. Terry Cole's letter dated April 14, 1988, and received April 14, 1988.
9. Mr. Terry Cole's revised letter dated April 14, 1988, and received April 14, 1988.
10. Mr. Terry Cole's letter dated April 18, 1988, and received April 19, 1988.

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.

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.

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 noncompliance 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.

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 No. 2 MEE system may operate continuously, i.e., 8760 hours/year.

2. For testing, NSPS, and PSD purposes, the maximum total process input rate to the No. 2 MEE system will be 450,000 lbs/hr of black liquor (15% solids). Tests for compliance will be performed with the control device (No. 2 or 3 Lime Kiln) and the No. 2 MEE system operating at 90-100% of their maximum process input rates.

SPECIFIC CONDITIONS:

3. The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.a., which requires combustion of the TRS gases in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O_2 as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

4. The MEE system is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

5. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

6. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).

7. In the event that a compliance test has to be performed on the MEE System for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 shall be used.

8. Pursuant to the Consent Order, OGC Case No. 86-1405, the MEE system shall be in compliance by August 12, 1988, and the permittee shall provide proof of final compliance to the Duval County's Bio-Environmental Services Division (BESD) office by September 26, 1988.

9. The MEE system shall be in compliance with all applicable provisions of FAC Rules 17-2 and 17-4.

10. The MEE system is subject to the provisions of FAC Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.

11. The MEE system is subject to the provisions of FAC Rules 17-2.710(4): Quarterly Reporting Requirements; and, 17-4.140: Reports.

12. The BESD office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the BESD office within 45 days of test completion.

SPECIFIC CONDITIONS:

13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit in accordance with FAC Rules 17-2 and 17-4.

If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct. (FAC Rule 17-4)

14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to DER's Bureau of Air Quality Management office and the BESD office.

15. The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the lime kilns are the TRS control devices for the No. 2 MEE system.

16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO_2 emissions. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which $1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

Issued this 10 day of May, 1988

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann

Dale Twachtmann, Secretary

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

PERMITTEE:
Seminole Kraft Corp.
P. O. Box 26998
Jacksonville, FL
32218-0998

Permit Number: AC 16-141801
Expiration Date: September 24, 1989
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: No. 3 Multiple Effect Evaporator System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 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 permitting of the No. 3 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s), concentrator(s) and the new noncondensible gas (NCG) handling system constructed to collect and transport all of the NCG emissions from the MEE System to the No. 2 or 3 Lime Kiln for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 744.2 km East and 3365.6 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o MEE System 3-07-001-03

Construction will be in accordance with the permit application, plans, documents, and reference materials submitted unless otherwise stated in the General and Specific Conditions.

ATTACHMENTS

AC 16-141801

Attachments to be Incorporated:

1. Seminole Kraft's application package received November 12, 1987.
2. BESD's letter requesting additional information received December 10, 1987.
3. DER's incompleteness letter dated December 11, 1987.
4. NE District office's letter received January 4, 1988.
5. Seminole Kraft's response received January 26, 1988.
6. EPA's letter on NSPS guidelines dated October 23, 1987.
7. Technical Evaluation and Preliminary Determination dated March 31, 1988.
8. Mr. Terry Cole's letter dated April 14, 1988, and received April 14, 1988.
9. Mr. Terry Cole's revised letter dated April 14, 1988, and received April 14, 1988.
10. Mr. Terry Cole's letter dated April 18, 1988, and received April 19, 1988.

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.

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.

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 noncompliance 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.

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 No. 3 MEE system may operate continuously, i.e., 8760 hours/year.

2. For testing, NSPS, and PSD purposes, the maximum total process input rate to the No. 3 MEE system will be 450,000 lbs/hr of black liquor (15% solids). Tests for compliance shall be performed with the control device (No. 2 or 3 Lime Kiln) and the No. 3 MEE system operating at 90-100% of their maximum process input rates.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-141801
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.a., which requires the combustion of the TRS gases in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O_2 as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

4. The MEE system is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

5. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

6. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).

7. In the event that a compliance test has to be performed on the MEE system for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 shall be used.

8. Pursuant to the Consent Order, OGC Case No. 86-1405, the MEE system shall be in final compliance by August 12, 1988, and the permittee shall provide proof of final compliance to the Duval County's Bio-Environmental Services Division (BESD) office by September 26, 1988.

9. The MEE system shall be in compliance with all applicable provisions of FAC Rules 17-2 and 17-4.

10. The MEE system is subject to the provisions of FAC Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.

11. The MEE system is subject to the provisions of FAC Rules 17-2.710(4): Quarterly Reporting Requirements; and, 17-4.140: Reports.

12. The BESD office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the BESD office within 45 days of test completion.

SPECIFIC CONDITIONS:

13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit in accordance with FAC Rules 17-2 and 17-4.

If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct. (FAC Rule 17-4)

14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to DER's Bureau of Air Quality Management office and the BESD office.

15. The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the lime kilns are the TRS control devices for the No. 3 MEE system.

16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO_2 emissions. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which $1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

Issued this 10 day of May, 1988.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann

Dale Twachtmann, Secretary

ATTACHMENT 8
FOR
AC 16-141798
AC 16-141799
AC 16-141800
AC 16-141801

LAW OFFICES
OERTEL & HOFFMAN
A PROFESSIONAL ASSOCIATION

KENNETH G. OERTEL
KENNETH F. HOFFMAN
SEGUNDO J. FERNANDEZ
TERRY COLE
HAROLD F. X. PURNELL
M. CHRISTOPHER BRYANT
W. DAVID WATKINS
MARTHA J. EDENFIELD
R. L. CALEEN, JR.
WILLIAM E. POWERS, JR.

SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301
TELEPHONE (904) 877-0099

MAILING ADDRESS:
POST OFFICE BOX 6507
TALLAHASSEE, FLORIDA 32314-6507

April 14, 1988

BY HAND DELIVERY

RECEIVED
APR 15 1988
DER-BAQM

Mr. William A. Thomas, P.E. III
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Thomas:

The purpose of this letter is to relate and confirm the agreements reached in the meeting between you, Mr. Mitchell and Mr. Raval for the Department and Mr. Millican and Mr. Barton for Seminole Kraft Corporation on April 14, 1988. The meeting was for the specific purpose of resolving all remaining issues relating to Seminole Kraft Construction permits to comply with the existing source TRS emissions rule.

The specific permits are:

AC 16-141790 - #1 Lime Kiln
AC 16-141792 - #2 Lime Kiln
AC 16-141793 - #3 Lime Kiln
AC 16-141798 - 1 & 2 Digesters
AC 16-141799 - #1 MEE's
AC 16-141800 - #2 MEE's
AC 16-141801 - #3 MEE's

The specific agreement developed for AC 16-141798 relating to Specific Condition Number 2 is as follows:

2A. For PSD purposes the maximum production rate of the Nos. 1 and 2 batch digester systems will be 1987 TPD ADP (tons per day of air dried pulp based on a nominal utilization rate of 580,000 lbs/hr wood chips (dry) and 898,000 lbs/hr of black/white liquor).

B. For testing purposes the maximum production rate of the Nos. 1 and 2 batch digester systems will be 120 TPH ADP (tons per hour of air dried pulp). Tests for compliance will be performed with the control device (No. 2 or 3 lime kiln) operating at 90-100% of maximum lime kiln operating

rate and with digester systems 1 and 2 operating at reasonably high operating rates.

The specific agreement developed for the MEE's relating to specific condition number 2 is as follows:

AC 16-141799 - Number 1 MEE

SC Number 2 - For testing and PSD purposes the maximum total process input rate to the number 1 MEE system will be 330,000 lbs/hr of black liquor (15% solids).

AC 16-141800 Number 2 MEE's and AC 16-141801 no. 3 MEE's - For testing and PSD purposes the maximum total process input rate to the Nos. 2 and 3 MEE systems will be 450,000 lbs/hr of black liquor (15% solids).

This information is submitted to expedite confirmation of this agreement. The comments to confirm agreements on the other specific conditions for all of the subject permit applications will be completed and submitted on April 15, 1988.

We really appreciate the consideration from you and your staff in resolving these issues which are so vital to continued operation of the Seminole Kraft Corporation plant in Jacksonville, Florida.

Sincerely,

Terry Cole

Terry Cole

TC:slt
1003.010

cc: Frank Lee
Malcolm Williams
Mike Riddle
John Millican
Curt Barton

Copied: Bruce Mitchell
Pradeep Raval
CHF/BT
Khurshid Mehta, BESD
} 4.19.88

ATTACHMENT 9
FOR
AC 16-141798
AC 16-141799
AC 16-141800
AC 16-141801

LAW OFFICES
OERTEL & HOFFMAN
A PROFESSIONAL ASSOCIATION

KENNETH G. OERTEL
KENNETH F. HOFFMAN
SEGUNDO J. FERNANDEZ
TERRY COLE
HAROLD F. X. PURNELL
M. CHRISTOPHER BRYANT
W. DAVID WATKINS
MARTHA J. EDENFIELD
R. L. CALEEN, JR.
WILLIAM E. POWERS, JR.

SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301
TELEPHONE (904) 877-0099

MAILING ADDRESS:
POST OFFICE BOX 6507
TALLAHASSEE, FLORIDA 32314-6507

April 14, 1988
Revised April 15, 1988

BY HAND DELIVERY

Mr. William A. Thomas, P.E. III
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Thomas:

The purpose of this letter is to relate and confirm the agreements reached in the meeting between you, Mr. Mitchell and Mr. Raval for the Department and Mr. Millican and Mr. Barton for Seminole Kraft Corporation on April 14, 1988. The meeting was for the specific purpose of resolving all remaining issues relating to Seminole Kraft Construction permits to comply with the existing source TRS emissions rule.

The specific permits are:

AC 16-141790 - #1 Lime Kiln
AC 16-141792 - #2 Lime Kiln
AC 16-141793 - #3 Lime Kiln
AC 16-141798 - 1 & 2 Digesters
AC 16-141799 - #1 MEE's
AC 16-141800 - #2 MEE's
AC 16-141801 - #3 MEE's

The specific agreement developed for AC 16-141798 relating to Specific Condition Number 2 is as follows:

2A. For PSD purposes the maximum production rate of the Nos. 1 and 2 batch digester systems will be 1987 TPD ADP (tons per day of air dried pulp based on a nominal utilization rate of 580,000 lbs/hr wood chips (dry) and 898,000 lbs/hr of black/white liquor).

B. For testing purposes the maximum production rate of the Nos. 1 and 2 batch digester systems will be 120 TPH ADP (tons per hour of air dried pulp). Tests for compliance will be performed with the control device (No. 2 or 3 lime

kiln) operating at 90-100% of maximum lime kiln operating rate and with digester systems 1 and 2 operating at reasonably high operating rates.

The specific agreement developed for the MEE's relating to specific condition number 2 is as follows:

AC 16-141799 - Number 1 MEE

SC Number 2 - For testing and PSD purposes the maximum total process input rate to the number 1 MEE system will be 330,000 lbs/hr of black liquor (15% solids). Tests for compliance will be performed with the control device (No. 2 or 3 lime kiln) operating at 90-100% of maximum lime kiln operation rate and with No. 1 MEE operating at a reasonably high operating rate.

AC 16-141800 Number 2 MEE's and AC 16-141801 no. 3 MEE's - For testing and PSD purposes the maximum total process input rate to the Nos. 2 and 3 MEE systems will be 450,000 lbs/hr of black liquor (15% solids). Tests for compliance will be performed with the control device (No. 2 or 3 lime kiln) operating at 90-100% of maximum lime kiln operation rate and with No. 2 and 3 MEE operating at a reasonably high operating rate.

This information is submitted to expedite confirmation of this agreement. The comments to confirm agreements on the other specific conditions for all of the subject permit applications will be completed and submitted on April 15, 1988.

We really appreciate the consideration from you and your staff in resolving these issues which are so vital to continued

operation of the Seminole Kraft Corporation plant in Jacksonville, Florida.

Sincerely,

Segundo J. Fernandez

for Terry Cole

TC:slt
1003.010

cc: Frank Lee
Malcolm Williams
Mike Riddle
John Millican
Curt Barton

Copied: Bruce Mitchell
Pradeep Raval
CHFIBT
Khurshid Mehta, BESD
4-19-88

ATTACHMENT 9
FOR
AC 16-141790
AC 16-141792
AC 16-141793

ATTACHMENT 10
FOR
AC 16-141798
AC 16-141799
AC 16-141800
AC 16-141801

Jill Copy

LAW OFFICES
OERTEL & HOFFMAN
A PROFESSIONAL ASSOCIATION

KENNETH G. OERTEL
KENNETH F. HOFFMAN
SEGUNDO J. FERNANDEZ
TERRY COLE
HAROLD F. X. PURNELL
M. CHRISTOPHER BRYANT
W. DAVID WATKINS
MARTHA J. EDENFIELD
R. L. CALEEN, JR.
WILLIAM E. POWERS, JR.

SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301
TELEPHONE (904) 877-0099

MAILING ADDRESS:
POST OFFICE BOX 6507
TALLAHASSEE, FLORIDA 32314-6507

April 18, 1988

BY HAND DELIVERY

Mr. William A. Thomas, P.E. III
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Thomas:

The purpose of this letter is to confirm agreements between your staff and Seminole Kraft concerning specific conditions for the following permits:

AC 16-141790 No. 1 lime kiln
AC 16-141792 No. 2 lime kiln
AC 16-141793 No. 3 lime kiln
AC 16-141798 Nos. 1 and 2 batch digester system
AC 16-141799 No. 1 multiple effect evaporator system
AC 16-141800 No. 2 multiple effect evaporator system
AC 16-141801 No. 3 multiple effect evaporator system

The specific agreements for permit AC 16-141790 - No. 1 lime kiln are:

Specific Conditions 1, 2, 6, 7, 8, 9, 10, 12 and 14 are acceptable as written in the permit dated March 31, 1988.

Specific Condition 3 - Amend to Read:
The number 6 fuel oil firing rate shall not exceed 60 MMBtu/Hr. heat input. The sulfur content of the fuel oil shall not exceed 2.3% by weight.

Specific Condition 4 - Retain 4-a, b, and c as written and delete 4-d.

Specific Condition 5 - Amend to Read:
Initial and annual compliance tests shall be conducted using the following test methods in accordance with F.A.C. Rules 17-2.700 or other test methods previously approved by the Department and approved by the Department for this permit.

a. EPA method 5, determination of particulate emissions from stationary sources.

b. EPA method 9, visual determination of the opacity of the emissions from stationary sources.

c. EPA method 16 or 16A, determination of TRS emissions from stationary sources.

Specific Condition 11 - Amend to Read:
The No. 1 lime kiln shall be tested one time only for SO_2 emissions to establish the level of SO_2 for PSD tracking purposes.

Specific Condition 13 - Retain the first sentence as written. Delete the remainder and add:
The permittee may continue to operate in compliance with all terms of the construction permits as provided in F.A.C. Rules 17-2 and 17-4.

Retain the last paragraph under Specific Condition 13.

Specific Agreements for Permits Nos. AC 16-141792 (No. 2 lime kiln) and AC 16-141793 (No. 3 lime kiln) are:

Specific Condition 1, 2, 4, 7, 8, 9, 10, 11, 12, 14, and 16 are acceptable as written in the permit dated March 31, 1988.

Specific Condition 3 - Amend to Read:
The No. 6 fuel oil firing rate shall not exceed 60 MMBtu/Hr. heat input. The sulfur content of the fuel oil shall not exceed 2.3% by weight.

Specific Condition 4 - The No. 2 and 3 lime kilns shall be incineration devices for TRS emissions from the Nos. 1

and 2 batch digester systems and the Nos. 1, 2 and 3 multiple effect evaporator systems.

Specific Condition 5 - Retain 5-a, b, and c, as written and delete 5-d.

Specific Condition 6 - Amend to Read:
Initial and annual compliance tests shall be conducted using the following test methods in accordance with F.A.C. Rule 17-2.700 or other test method previously approved by the Department and approved by the Department for this permit:

a. EPA method 5, determination of particulate emissions from stationary sources.

b. EPA method 9, visual determination of the opacity of emissions from stationary sources.

c. EPA method 16 or 16-a, determination of TRS emissions from stationary sources.

Specific Condition 13 - Amend to Read:
The Nos. 2 and 3 lime kilns shall be tested one time only for SO_2 emissions for PSD tracking purposes. The results also will be used to assess the appropriate fee pursuant to F.A.C. Rule 17-4, of which $1,000.00 (more than 100 TPY potential pollution emissions) has already been received.

Specific Condition 15 - Retain the first sentence as written. Delete the remainder and add:
The permittee may continue to operate in compliance with all terms of the construction permit as provided in F.A.C. Rule 17-2 and 17-4.

The specific agreement for permit number AC 16-141798 Nos. 1 and 2 batch digester systems are:

Specific conditions 1, 4, 5, 6, 7, 9, 10, 11, 12, 14 and 16 are acceptable as written in the permit dated March 31, 1988.

Specific Condition 2 should be amended as in our letter of April 15, 1988, attached.

Specific Condition 3 - Amended to Read:
The Nos. 1 and 2 batch digester systems are subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (F.A.C.), Rule 17-2.600(4)(c)1a which requires combustion of the TRS gasses in the Nos. 2 or 3 lime kiln, from which the exhaust gasses shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% 02 as a 12 hour average, in accordance with F.A.C. Rule 17-2.600(4)(c)5.

Specific Condition 8 should be amended by deleting the phrase "and 40 CFR 60, Appendix A".

Specific Condition 13 should be amended by replacing, in the last sentence of the first paragraph, the words "until its final expiration date. (F.A.C. 17-2 and 17-4)", with the words "in accordance with F.A.C. Rule 17-2 and 17-4."

Specific Condition 15 should be amended by striking the word "pollution" in the third line and replacing it with the word "TRS".

The specific agreements for permits No. AC 16-141799, AC 16-

141800 and AC 16-141801, (Nos. 1, 2, and 3 multiple effect evaporator) are:

Specific Conditions 1, 4, 5, 6, 8, 9, 10, 11, 12, 14 and 16 are acceptable as written in the permits dated March 31, 1988.

Specific Condition 2 of each permit should be amended as indicated in our letter of April 15, 1988, attached.

Specific Condition 3 of each permit should be amended to read as follows:

The Nos. 2 and 3 multiple effect evaporators are subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (F.A.C.) Rule 17-2.600(4)(c)1a, which requires combustion of the TRS gasses in the No. 2 or 3 lime kiln, from which the exhaust gasses shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% 02 as a 12 hour average in accordance with F.A.C. Rule 17-2.600(4)(c)(5).

Specific Condition 7 for each permit should be amended by deleting the phrase:

"and 40 CFR 60, Appendix A".

Specific Condition 13 for each permit should be amended by placing, in the last sentence of the first paragraph the words "until its final expiration date. (F.A.C. Rules 17-2 and 17-4)", with the words "in accordance with F.A.C. Rule 17-2 and 17-4.

Specific Condition 15 for each permit should be amended by striking the word "pollution" in the third line and replacing it with the word "TRS".

The foregoing represents the agreement reached at the meeting based on our records and our understanding of the discussion. If you have any concerns or questions please call Mr. C. A. Barton, (404) 621-6707.

The information provided herein is intended to resolve all issues relating to Seminole Kraft Corporation's TRS construction permits and allows you to expeditiously process and issue these permits. We sincerely appreciate the effort of you and your staff to finalize these permits.

Sincerely,

Terry Cole

Terry Cole

TC:slt
1003.014

Copied: CHF/BT
Bruce Mitchell
Pradeep Raval
Khurshid Mehta, BOSO
} 4.19.88

ATTACHMENT 11
FOR
AC 16-141798

 Main File

Hand Delivered

AC16-141798

Summary draft

DIGESTER SYSTEM TRS PERMIT

Proposed Section 2 Condition

2A - For PSD purposes, the annual production rate of the Nos. 1 and 2 Batch Digestor Systems will be 685,000 TPY ADP (tons per year, air dry pulp).

2B - For NSPS purposes, the maximum production rate of the Nos. 1 and 2 Batch Digester Systems will be 120 TPH ADP (tons per hour, air dry pulp) and 1987 TPD ADP (tons per day, air dry pulp).

2C - For testing purposes, the maximum production rate of the Nos. 1 and 2 Batch Digester Systems will be 82 TPH ADP (tons per hour, air dry pulp). Tests for compliance will be performed with the control device (No. 2 or 3 Lime Kiln) operating at 90 - 100% of maximum Lime Kiln operating rate and with digester systems 1 and 2 operating as near the maximum production rate as possible, but in no case shall the operating rate of the digestors be less than 85% of the maximum production rate.

Seminole Kraft Corporation
#1 and #2 Batch Digester Systems
Hourly Digester Capacity

Basis

Blow Systems	= 2 (hence, can blow two digesters at once)
Blow Time	= 15 minutes
Production Per Blow	= 14.7 Air Dry Tons per Blow
	(14.1 Machine Dry Tons per Blow)

Calculations

$$\text{Hourly Capacity} = 2 \times \frac{60 \text{ minutes}}{15 \text{ minutes/blow}} \times \frac{14.7 \text{ AD Tons}}{\text{Blow}}$$

$$= 118 \text{ TPH}$$

Use - 120 Tons per hour, Air Dry Pulp

cc: Steve Smallwood
CHF
BT
Pradeep Raval
Bruce Mitchell
} 5-5-88 PR