STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION PC 16-141790

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE FLORIDA 32207



BOB GRAHAM GOVERNOR VICTORIA J. TSCHINKEL

SECRETARY

(904) 396-6959((1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)	18 11 11	(Muv)¥) NUV	12 1987	ERNEST E TREY DISTRICT MANAGER
Control of the Contro	STATE OF F	B	AOM	
	ICATION TO OPERATE/CO	ONSTRUCT AIR POLLUT	TION SOURCES	
SOURCE TYPE: Air Po	llution	[] New ¹ [x]	Existingl	
(APPLICATION TYPE: [X]	Construction [] Op	eration [] Modif	fication	
COMPANY NAME: Semin	ole Kraft Corpora	tion	COUNTY:_	Duval
Identify the specific o	emission point source	(s) addressed in t	this applicati	on (i.e. Lime
Kiln No. 4 with Ventur	i Scrubber; Peaking U	nit No. 2, Gas Fin	red) <u>No.1 Li</u>	me Kiln
SOURCE LOCATION: Stree	et 9469 Eastport	Road	City_J	acksonville
UTM:	East 7441.75	No i	rth <u>3365.6</u>	0
Lati	tude <u>30° 25' 1</u>	<u>5</u> "N Lor	ngitude <u>81</u> °	36 ' 00 "W
APPLICANT NAME AND TIT	LE: T. Frank Lee.	General Manager		
APPLICANT ADDRESS:P	0.0. Box 26998	Jacksonvil	le, FL 32	218
Si	ECTION I: STATEMENTS	BY APPLICANT AND	ENGINEER	
A. APPLICANT				
I am the undersign	ed owner or authorize	d representative*	of <u>Seminole</u>	Kraft Corp.
permit are true, con I agree to mainta facilities in such Statutes, and all the also understand the	statements made in torrect and complete to in and operate the a manner as to complete the rules and regulate at a permit, if grang notify the departments	o the best of my be pollution control ply with the provions of the depart ted by the departs	knowledge and source and prision of Chaptment and revi	belief. Further collution controcter 403, Florid sions thereof. non-transferabl
*Attach letter of author	orization	Signed:	Jan .	·
		T. Frank L Name and Tit	ee, General le (Please Ty	Manager pe)
		Date: 11-11-87	Gelephone 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 hav been designed/examined by me and found to be in conformity with modern engineerin 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)

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	the pollution control facilities, when properly maintained and operated, will discharg 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 prope
	maintenance and operation, of the pollution control facilities and, if applicable pollution sources.
	Signed John T. Me Vinna P. E. Willey
	John T. McKinnon P.E. Name (Please Type) 3 (A) 5 (A) 5 (A) 5
	Stone Container Corporation And Angles Company Name (Please Type)
	Suite 400 ———————————————————————————————————
Flo	rida Registration No. <u>37697</u> Date: <u>11-11-87</u> Telephone No. <u>(404)</u> <u>621-6709</u>
	SECTION II: GENERAL PROJECT INFORMATION
Α.	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
В.	Schedule of project covered in this application (Construction Permit Application Only)
	Start of Construction <u>Sept 12, 1988</u> Completion of Construction <u>Sept 12, 1989</u>
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
055	
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	this is a new source or major modification, answer the following quest s or No)	ions.
ι.	Is this source in a non-attainment area for a particular pollutant?	_NA
	a. If yes, has "offset" been applied?	قار،
	b. If yes, has "Lowest Achievable Emission Rate" been applied?	
	c. If yes, list non-attainment pollutants.	
·	Does best available control technology (BACT) apply to this source? If yes, see Section VI.	
5.	Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII.	
٠.	Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source?	
	Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source?	
	"Reasonably Available Control Technology" (RACT) requirements apply this source?	NA
	a. If yes, for what pollutants?	

cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

Raw Materials and Chemicals Used in your Process, if applicable:

	Contami	inants	Utilization	
Description	Туре	% Wt	Rate - lbs/hr	Relate to Flow Diagram
Lime Mud	NA	NA	24,000	14
				,.•

8.	Process Rate, if applicable:	(See Section V,	Item 1)
	1. Total Process Input Rate	(lbs/hr):24	,000 lbs/hour (Dry Basis)

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

Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of	Emission ¹		Allowed ² Emission Rate per	Allowable ³ Emission	Potent Emiss	Relate to Flow	
Contaminant .	Maximum lbs/hr	Actual T/yr	Rule 17-2 (a) 0 .62	lbs/hr	lbs/yr	T/yr	Diagram
Particulate	16	63	(a) 0. 62 E=3.59P	16	(b) 8,212,500	4,106	14
Visible Emissi	on	NA	10% Opacity (d)	NA	N	Α	
TRS		NA	20 ppm	NA	913,668	457	
					·.		

¹See Section V, Item 2.

d) 17-2.600(4)(c)(5)

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 $^{^{2}}$ 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).

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3). a) 17.2650(2)(c)(9)

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 NA	See attachments
* Will meet applicable	emission limits			, i.e.

E. Fuels

	Consu	mption*		
Type (Be Specific)	avg/hr	max./hr	Maximum Heat Input (MMBTU/hr)	
No.6 Fuel Oil	204_GPH	400 GPH	60	
<u> </u>	<u> </u>			

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

5	1	Ana	1 40	ic.

Percent Sulfur:	2.27		Percent Ash: 0.048	
Density:	8.0	lbs/gal	Typical Percent Nitrogen: 0.3	
Heat Capacity:	18,750	BTU/1b	150,000	BTU/gal
Other Fuel Contam:	inants (which may ca	use air p	ollution):	
F. If applicable	, indicate the perce	nt of fue	l used for space heating.	
Annual Average	NA .	Ma	ximum	
			and method of disposal.	•
Dust recovered	l by the lime kiln s	crubber i	s recycled back to kiln and water is	
used in liquor	make up cycle.			·

H. Emission	Stack G	eometry and	Flow Cha	racteris	stics (Pi	rovide	data for	each stack):
Stack Height	:	_69.0		ft.	Stack Di	amete	r:	5.83	ft.
Gas Flow Rat	e:29,1	LOO ACFM_	16,180	DSCFM	Gas Exit	: Temp	erature:	160 .	°F.
Water Vapor	Content:	3	5	%	Velocity	/:	18	, <u> </u>	FPS
		SECT	ION IV:	INCINERA	ATOR INFO	ORMATI	ON	na	
Type of Waste (I	Type O Plastics	Type I) (Rubbish)	.Type II (Refuse)				Type V (Liq.& Gas By-prod.		
Actual lb/hr Inciner- ated	·.								
Uncon- trolled (lbs/hr)									
Description Total Weight Approximate N Manufacturer	Incinera	ated (lbs/h f Hours of	r)	per day	Desig	ŋn Cap day∕	acity (lbs,		
Date Constru	cted			Mode	el No		 	·	
		Volume (ft) ³		elease /hr)	Туре	Fuel	BIU/hr	Tempera (°F	
Primary Cha	mber								
Secondary C	hamber				· · · · · · · · · · · · · · · · · · ·				<u>:</u>
Stack Height	:	ft.	Stack Dia	mter: _			Stack	Temp.	
Gas Flow Rate	e:		ACFM		DS	CFM*	Velocity:		FPS
#If 50 or mo dard cubic fo						emiss	ions rate	in grains	per stan-
Type of poll	ution co	ntrol devic	e: [] C	yclone	[] Wet	Serub	ber []A	fterburner	
			[] 0	ther (sp	ecify)_				
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,	•							
	disposal					he stack (
	Water	is used	i in liquo	r make up	cycle	 		
							,	مهدر .

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 DER Form 17-1.202(1) Effective November 30, 1982

9.	The appropriate	application fee	in accordance	with Rule	17-4.05.	The che	ck should	bе
	made payable to	the Department o	f Environmenta	l Regulatio	on.			

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
٠.	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
	Has EPA declared the best available control technology for this class of sources (If
	[] Yes [] No
	Contaminant Rate or Concentration
	What emission levels do you propose as best available control technology?
	Contaminant Rate or Concentration
•	Describe the existing control and treatment technology (if any).
	1. Control Device/System: 2. Operating Principles:

*Explain method of determining

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3. Efficiency:*

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4. Capital Costs:

	5.	Useful Life:		6.	Operating Costs:				
	7.	Energy:		8.					
	9.	Emissions:			Maintenance Cost:	•			
		Contaminant			Rate or Concentration				
		·				· · · · · · · · · · · · · · · · · · ·			
		·							
						-,725-			
	10.	Stack Parameters							
	а.	Height:	ft.	ь.	Diameter: .	ft.			
	c.	Flow Rate:	ACFM	d.	Temperature:	°F.			
	е.	Velocity:	FPS						
Ε.		cribe the control and treatment additional pages if necessary).	techn	olog	y available (As many types as	applicable,			
	1.		٠.						
	a.	Control Device:		b.	Operating Principles:				
	c.	Efficiency: 1		d.	Capital Cost:	٠			
	е.	Useful Life:		f.	Operating Cost:				
	ġ.	Energy: 2		h.	Maintenance Cost:				
	i.	Availability of construction ma	terial	s an	d process chemicals:				
	j.	Applicability to manufacturing	proces	ses:					
	k.	. Ability to construct with control device, install in available space, and operate within proposed levels:							
	2.				•				
	а.	Control Device:		b.	Operating Principles:				
	c.	Efficiency: 1		d.	Capital Cost:				
	е.	Useful Life:		f.	Operating Cost:				
	g.	Energy: 2		h.	Maintenance Cost:				
	i.	Availability of construction ma	terial	s an	d process chemicals:				
l _{Ex} 2En	plai: ergy	n method of determining efficient to be reported in units of elec	cy. trical	pow	er - KWH design rate.				
		m 17~1.202(1) ve November 30, 1982	Page	9 of	12				
					; ·				

Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: 3. Control Device: Operating Principles: b. Efficiency: 1 Capital Cost: d. Useful Life: Operating Cost: Energy: 2 Maintenance Cost: Availability of construction materials and process chemicals: Applicability to manufacturing processes: j. Ability to construct with control device, install in available space, and operate within proposed levels: 4. Control Device: Operating Principles: h. Efficiency: 1 Capital Costs: d. Useful Life: Operating Cost: f. Energy: 2 Maintenance Cost: h. Availability of construction materials and process chemicals: Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: Describe the control technology selected: 1. Control Device: 2. Efficiency: 1 Capital Cost: Useful Life: Energy: 2 Operating Cost: Maintenance Cost: Manufacturer: 9. Other locations where employed on similar processes: (1) Company: (2) Mailing Address: (4) State: (3) City: ¹Explain method of determining efficiency. 2 Energy to be reported in units of electrical power - KWH design rate.

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(5) Environmental Manager:	:			
(6) Telephone No.:				
(7) Emissions: 1				
Contaminant		-	Rate or Concen	tration
	-			
(8) Process Rate: 1				
b. (1) Company:				خلاق. مارز
(2) Mailing Address:				
(3) City:		(4) State:		
(5) Environmental Manager:				•
(6) Telephone No.:				
(7) Emissions: 1				
Contaminant	·.		Rate or Concent	tration
(8) Process Rate: 1				
10. Reason for selection a	ınd description	of systems:	•	
			Should this	information not b
SECTION VII	- PREVENTION O	F SIGNIFICAN	T DETERIORATION	NA
A. Company Monitored Data				
1no. sites	TSP	()	_ so ² *	Wind spd/dir
Period of Monitoring	month d	/ tay year	o / / month day y	rear
Other data recorded				
Attach all data or statisti	cal summaries	to this appl	ication.	
(6) Telephone No.: (7) Emissions: Contaminant Rate or Concentration (8) Process Rate: b. (i) Company: (2) Mailing Address: (3) City: (4) State: (5) Environmental Manager: (6) Telephone No.: (7) Emissions: Contaminant Rate or Concentration (8) Process Rate: 10. Reason for selection and description of systems: 1applicant must provide this information when available. Should this information not available, applicant must state the reason(s) why. SECTION VII - PREVENTION OF SIGNIFICANY DETERIORATION A. Company Monitored Data 1				
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=

	2. Instrumentatio	on, Field and Laboratory				
	a. Was instrument	ation EPA referenced or its	equivalent?	[] Yes	[] No	
	b. Was instrument	ation calibrated in accorda	nce with Depa	artment p	rocedures	3?
	[] Yes [] N	lo [] Unknown			•	
з.	Meteorological Dat	a Used for Air Quality Mode	ling	,		
	1 Year(s)	of data from // /month day ye	to	/ / day yea	<u> </u>	
	2. Surface data o	obtained from (location)	·			. =
	3. Upper air (mi)	ring height) data obtained f	rom (location	n)		
	4. Stability wind	l rose (STAR) data obtained	from (locatio	on)	··	
:.	Computer Models Us	ed				·.•
	1.		Modified?	If yes,	attach d	escription.
		ll final model runs showing	,			
).	Applicants Maximum	Allowable Emission Data				
	Pollutant	Emission Rate	•			
	TSP	·	gr:	ams/sec		
	so ²		gra	ams/sec	•	
Ξ.	Emission Data Used	ii				
		ssion sources. Emission da IEDS point number), UTM coo				

and normal operating time.

- F. Attach all other information supportive to the PSD review.
- 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.

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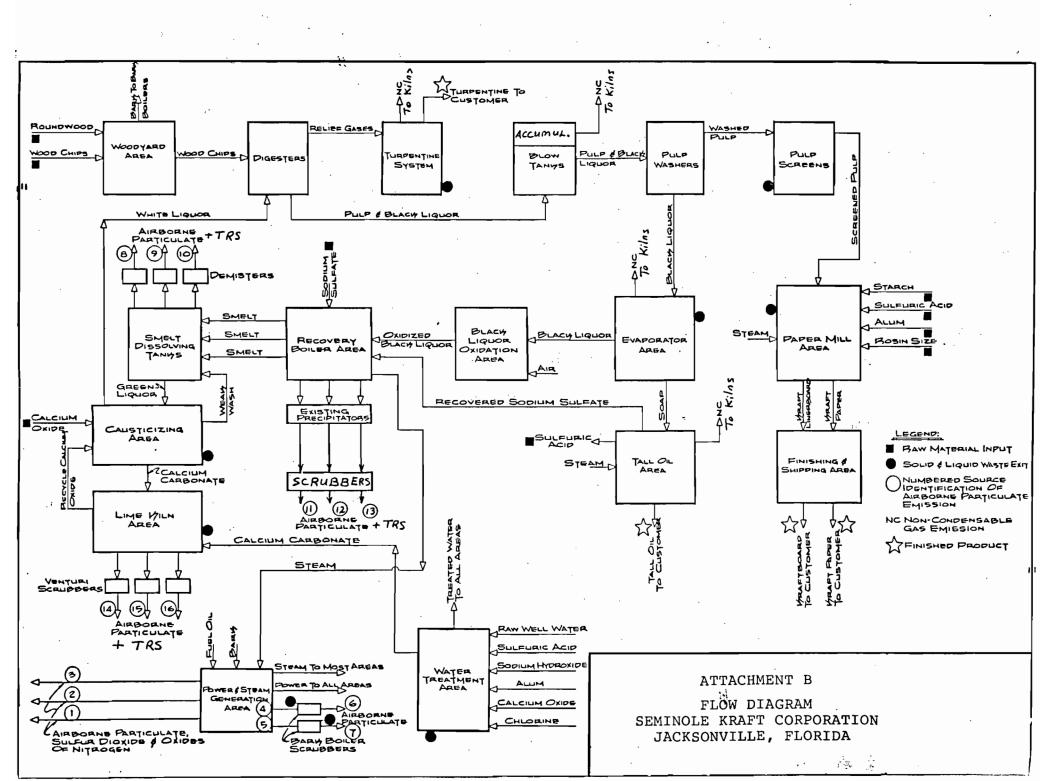
ATTACHMENT A

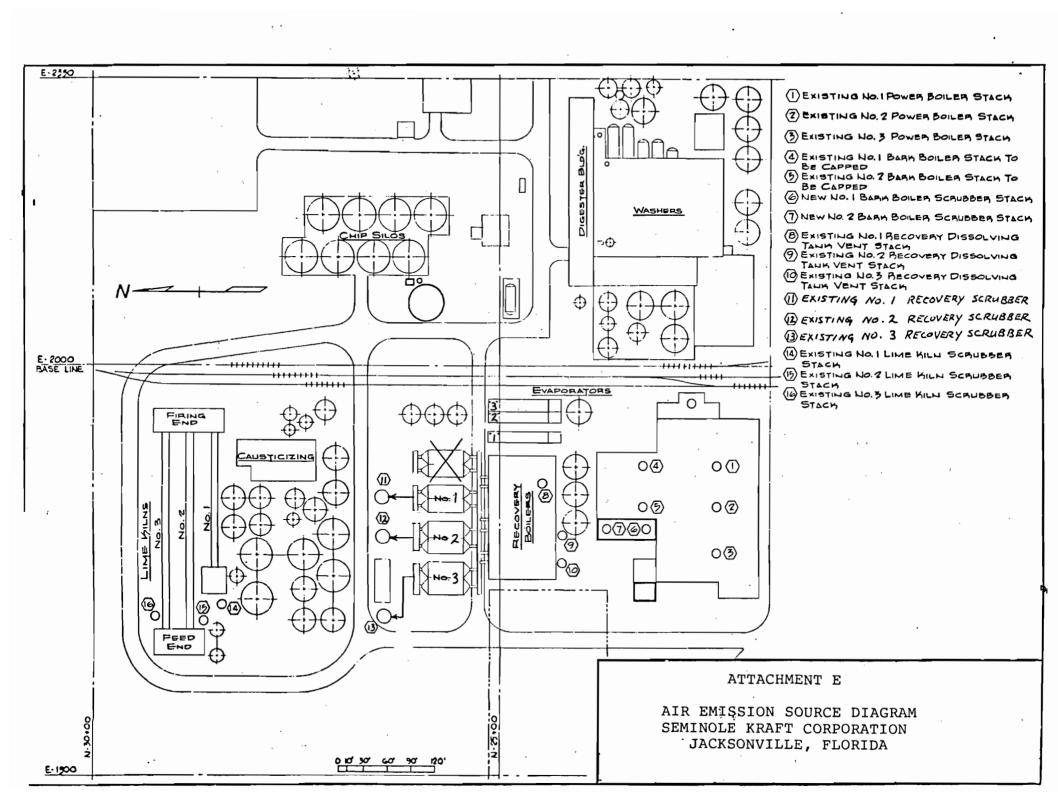
Lime Kiln No.1 Construction Permit Application

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.





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:

- Attendance at meeting with Federal, State and local regulatory officials;
- Execution of permit applications as required for operation of the corporation's facilities; and
- Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

Bv:

Vice President

BEST AVAILABLE COPY

STATE OF FLORIDA

Pa. \$1000.00 V # 9397 Ruccip+ #76193

DEPARTMENT OF ENVIRONMENTAL REGISTATION PC 16-141792

NORTHEAST DISTRICT

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



NOV 12 1987

BAQM

BOB GRAHAM GOVERNOR

VICTORIA J. TSCHINKEL SECRETARY

> TRNEST E TREY DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES SOURCE TYPE: Air Pollution [] New [X] Existing [] ARPLICATION TYPE: [X] Construction [] Operation [] Modification COMPANY NAME: Seminole Kraft Corporation	-
SOURCE TYPE: Air Pollution [] New [X] Existing Air Pollution [] Operation [] Modification COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval Identify the specific emission point source(s) addressed in this application (i.e. Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) #2 Lime Kiln	-
COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval Identify the specific emission point source(s) addressed in this application (i.e. Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) #2 Lime Kiln	
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	Lime
SOURCE LOCATION: Street 9469 Eastport Road City Jacksonv	ille
UTM: East 7441.75 North 3365.60	
Latitude <u>30° 25' 15</u> "N Longitude <u>81</u> ° <u>36</u> '	<u>00</u> "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 Co	rp.
permit are true, correct and complete to the best of my knowledge and belief. I agree to maintain and operate the pollution control source and pollution facilities in such a manner as to comply with the provision of Chapter 403 Statutes, and all the rules and regulations of the department and revisions the also understand that a permit, if granted by the department, will be non-trained I will promptly notify the department upon sale or legal pransfer of the	n contro] , Florida ereof.] insferabla
*Attach letter of authorization Signed:	
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 hav been designed/examined by me and found to be in conformity with modern engineerin 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)

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	the state of the s
	the pollution control facilities, when properly maintained and operated, will discharg 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 1. Me Luna, Many
	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)
Flo	rida Registration No. <u>37697</u> Date: <u>11-11-87</u> Telephone No. <u>(404) 621-6709</u>
	SECTION II: GENERAL PROJECT INFORMATION
Α.	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
В.	Schedule of project covered in this application (Construction Permit Application Only)
	Start of Construction <u>Sept 12, 1988</u> Completion of Construction <u>Sept. 12, 1989</u>
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

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	<u> </u>
f this is a new source or major modification, answer the following questi Yes or No)	ons.
. Is this source in a non-attainment area for a particular pollutant? _	NA
a. If yes, has "offset" been applied?	هار.
b. If yes, has "Lowest Achievable Emission Rate" been applied?	
c. If yes, list non-attainment pollutants.	
. Does best available control technology (BACT) apply to this source? If yes, see Section VI.	
. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII.	
Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source?	·
 Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? 	
o "Reasonably Available Control Technology" (RACT) requirements apply o this source?	NA
a. If yes, for what pollutants?	

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:

	Contam	inants	Utilization			
Description	Туре	% Wt	Rate - lbs/hr	Relate to Flow Diagram		
Lime Mud	NA	NA	32,000	15		
				· · · · · · · · · · · · · · · · · · ·		
				<u> - خن</u>		
				, ·		

В	Pracese	Rate	i f	aoplicable:	1500	Section	V	Itom	1)
	rrucess	naite.	1.1	auulicaule:	1366	36667011	٧.	ilem .	• /

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	Emission ¹		Allowed ² Emission Rate per	Allowable ³ Emission	Potential ⁴ Emission		Relate to Flow
Contaminant	Maximum lbs/hr	Actual T/yr	Rule 17-2	lbs/hr	lbs/yr	1/уг	Diagram _
Particulate	16	63	(a) 0.62 E=3.59P	16	(b) 8,212,500	4,106	15
Visible Emiss	ions	NANA	10% Opacity	NA	N.A.		
TRS		NA	(d) 20 ppm	NA	1,218,735	609	
							·

¹See Section V, Item 2.

a) 17-2.650(2)(c)(9)

b) AP-42 c) EPA
$$450/2-78-003b$$
 $\frac{4.2 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{795 \text{ tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = \frac{1,218,735}{\text{year}} = \frac{609 \text{ tons}}{\text{year}}$

d) 17-2.600(4)(c)(5) DER Form 17-1.202(1)

Effective November 30, 1982

²Reference 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)

³Calculated from operating rate and applicable standard.

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

D. Control Devices: (See Section V, It	tem 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
* will meet applicable	emission limits			- / / .

E. Fuels

	Cons	umption*	
Type (Be Specific)	avg/hr	max./hr	Maximum Heat Input (MMBTU/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.

Fue	l	Ana:	lys:	is:
-----	---	------	------	-----

Percent Sulfur:	2.27		Percent As	sh:	0.0	48		
Density:		lbs/gal	Typical Pe				3	
Heat Capacity: _	18,750	BTU/1b			150,000)		BTU/gal
Other Fuel Conta	minants (which may	cause air p	ollution):		· <u>-</u>			· · · · ·
	e, indicate the per				_			
Annual Average _	NA	Ma	ximum			_		
	uid or solid wastes				•			
Dust re	covered by the scru	bber \$ s rec	ycled back	to Kil	n. The	water	is used	i in
the	liquor make up cycl	e						

tack Height:	74.58		ft.	Stack Dia	meter:	4.	1
as Flow Rate: 26,3							
ater Vapor Conten							
							·
	SECT	ION IV:	INCINER	ATOR INFOR	MATION NA		
Type of Type Waste (Plasti					log- (Liq.		Type VI Solid By-prod.
Actual lb/hr Inciner- ated							
Uncon- trolled (lbs/hr)							
escription of Was	erated (lbs/h	r)		Design	Capacity	(lbs/hr	•)
escription of Was otal Weight Incin pproximate Number	erated (lbs/h of Hours of	r)	per da	Design	Capacity	(lbs/hr	•)
escription of Was otal Weight Incin pproximate Number anufacturer	erated (lbs/h of Hours of	r)	per da	Design	Capacity	(1bs/hr	(s/yr
escription of Was otal Weight Incin pproximate Number anufacturer	erated (lbs/h of Hours of	r) Operation Heat R	per da	Design y	Capacity	(1bs/hr	(s/yr
escription of Was otal Weight Incin oproximate Number anufacturer ate Constructed _	erated (lbs/h of Hours of	r) Operation Heat R	per da	Design y el No	Capacity day/wk	(1bs/hr	(s/yr
escription of Was otal Weight Incin pproximate Number anufacturer ate Constructed Primary Chamber	erated (lbs/h of Hours of Volume (ft)	r) Operation Heat R	per da	Design y el No	Capacity day/wk	(1bs/hr	(s/yr
escription of Was otal Weight Incin pproximate Number anufacturer ate Constructed Primary Chamber Secondary Chamber	erated (lbs/h of Hours of Volume (ft)	T) Operation Heat R (BIU	per da	Design y el No	Capacity day/wk	(lbs/hr	(s/yr
escription of Was otal Weight Incin oproximate Number anufacturer ate Constructed Primary Chamber Secondary Chamber tack Height:	Volume (ft).	T) Operation Heat R (BTU	per da	Design y el No	Capacity day/wk Fuel	(lbs/hr	Temperature (°F)
escription of Was otal Weight Incin pproximate Number anufacturer ate Constructed Primary Chamber Secondary Chamber tack Height: as Flow Rate: If 50 or more ton	Volume (ft). ft.	T) Operation Heat R (BTU Stack Dia ACFM	per da Mode elease /hr) mter:	Design y el No Type DSC	Capacity day/wk FuelSta	(lbs/hr wk	Temperature (°F)
escription of Was	Volume (ft). s per day des	Heat R (BTU Stack Dia ACFM ign capaced to 50%	per da	Design y el No. Type DSC bmit the en	Capacity day/wk Fuel BTU/h Sta	(lbs/hrwk	Temperature (°F)

			See_a	ttachment A	 	 	
n, etc.):			other than			
٠.				ior make up			
							عقائرات
		41					

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 air-borne 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.

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9.	The appropriate application fee in made payable to the Department of	n accordance with Rule 17-4.05. The check should be Environmental Regulation.
10.	With an application for operation struction indicating that the so permit.	permit, attach a Certificate of Completion of Con- urce was constructed as shown in the construction
	SECTION VI. DES	T AVAILABLE CONTROL TECHNOLOGY NA
Α.	applicable to the source?	new stationary sources pursuant to 40 C.F.R. Part 60
	[] Yes [] No	
	Contaminant	Rate or Concentration
в.	Has EPA declared the best availab yes, attach copy)	le control technology for this class of sources (If
	[] Yes [] No	
	Contaminant	Rate or Concentration
с.	What emission levels do you propos	e 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:
*Exp	olain method of determining	
	Form 17-1.202(1) ective November 30, 1982	Page 8 of 12

:

· .

	5.	Useful Life:		6.	Operating Costs:	
	7.	Energy:		8.	Maintenance Cost:	
	9.	Emissions:	,			
		Contaminant			Rate or Concentration	
		· · · · · · · · · · · · · · · · · · ·			·	
		·				
		·			·	
	10.	Stack Parameters				
	а.	Height:	ft.	ь.	Diameter:	ft.
	c.	Flow Rate:	ACFM	d.	Temperature:	of.
	e.	Velocity:	FPS			
Ξ.		cribe the control and treatment additional pages if necessary).	techn	olog	y available (As many types as	applicable,
	1.					
	а.	Control Device:		ь.	Operating Principles:	,
	с.	Efficiency: 1.		d.	Capital Cost:	
	е.	Useful Life:		f.	Operating Cost:	
	g.	Energy: ²		h.	Maintenance Cost:	
	i.	Availability of construction ma	terial	s an	d process chemicals:	
	j.	Applicability to manufacturing	proces	ses:		
	k.	Ability to construct with contr within proposed levels:	ol de	vice	, install in available space,	and operato
٠	2				•	
	а.	Control Device:		ь.	Operating Principles:	
	c.	Efficiency: 1		d.	Capital Cost:	
		Useful Life:		f.	Operating Cost:	
	e.					
	e. g.	Energy: ²		h.	Maintenance Cost:	

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Applicability to manufacturing processes: j. Ability to construct with control device, install in available space, and operate within proposed levels: 3. Control Device: Operating Principles: а. ь. Efficiency: 1 Capital Cost: . Useful Life: Operating Cost: Energy: 2 Maintenance Cost: Availability of construction materials and process chemicals: Applicability to manufacturing processes: j. Ability to construct with control device, install in available space, and operate k. within proposed levels: 4. Control Device: Operating Principles: b. Efficiency: 1 Capital Costs: d. c. Useful Life: Operating Cost: Energy: 2 q. h. Maintenance Cost: Availability of construction materials and process chemicals: Applicability to manufacturing processes: j. Ability to construct with control device, install in available space, and operate within proposed levels: Describe the control technology selected: Efficiency: 1 Control Device: 2. Capital Cost: Useful Life: Energy: 2 Operating Cost: Maintenance Cost: Manufacturer: Other locations where employed on similar processes: (1) Company: (2) Mailing Address: (3) City: (4) State: ¹Explain method of determining efficiency. 2 Energy to be reported in units of electrical power - KWH design rate.

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Effective November 30, 1982

·		•			
(5) Environmental Manager:					
(6) Telephone No.:					
(7) Emissions: l					
Contaminant			Rate or Cor	centration	
· · · · · · · · · · · · · · · · · · ·	_			,	
(8) Process Rate: 1					
b. (1) Company:					خلاود د ه د
(2) Mailing Address:	·				
		(4) State:			
(3) City:		(4) State:	•		
(5) Environmental Manager:			•	,	
(6) Telephone No.:	·				
(7) Emissions: 1					
Contaminant			Rate or Cor	ncentration	
			·		
	·				
(8) Process Rate: 1					
10. Reason for selection a	nd descriptio	n of systems			
oplicant must provide this invailable, applicant must stat SECTION VII		s) why.		nis informati NA	
Company Monitored Data					
1no. sites	TSP .	(_)	502*	Wind	spd/dir
Period of Monitoring					
	month	day year	month da	y year	
Other data recorded				,	
Attach all data or statisti	cal summaries	to this appl	lication.		
ecify bubbler (B) or continu	ous (C).		· .	·	
R Form 17-1.202(1) Fective November 30, 1982	P a g e	11 of 12			

=

<u>-</u>	Field and Laboratory
a. Was instrumenta	ion EPA referenced or its equivalent? [] Yes [] No
b. Was instrument:	ion calibrated in accordance with Department procedures?
[] Yes [] No	[] Unknown
Meteorological Data	Jsed for Air Quality Modeling
1 Year(s) o	data from / / to / / month day year month day year
2. Surface data of	ained from (location)
3. Upper air (mix	g height) data obtained from (location)
4. Stability wind	ose (STAR) data obtained from (location)
Computer Models Use	
1.	Modified? If yes, attach description
•	Modified? If yes, attach description
	Modified? If yes, attach description
	Modified? If yes, attach description
Attach copies of a ciple output tables	final model runs showing input data, receptor locations, and pr
Applicants Maximum	llowable Emission Data
Pollutant	Emission Rate
	anome/coa
TSP	grams/sec

point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

- Attach all other information supportive to the PSD review.
- Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). assessment of the environmental impact of the sources.
- 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.

DER Form 17-1.202(1) Effective November 30, 1982

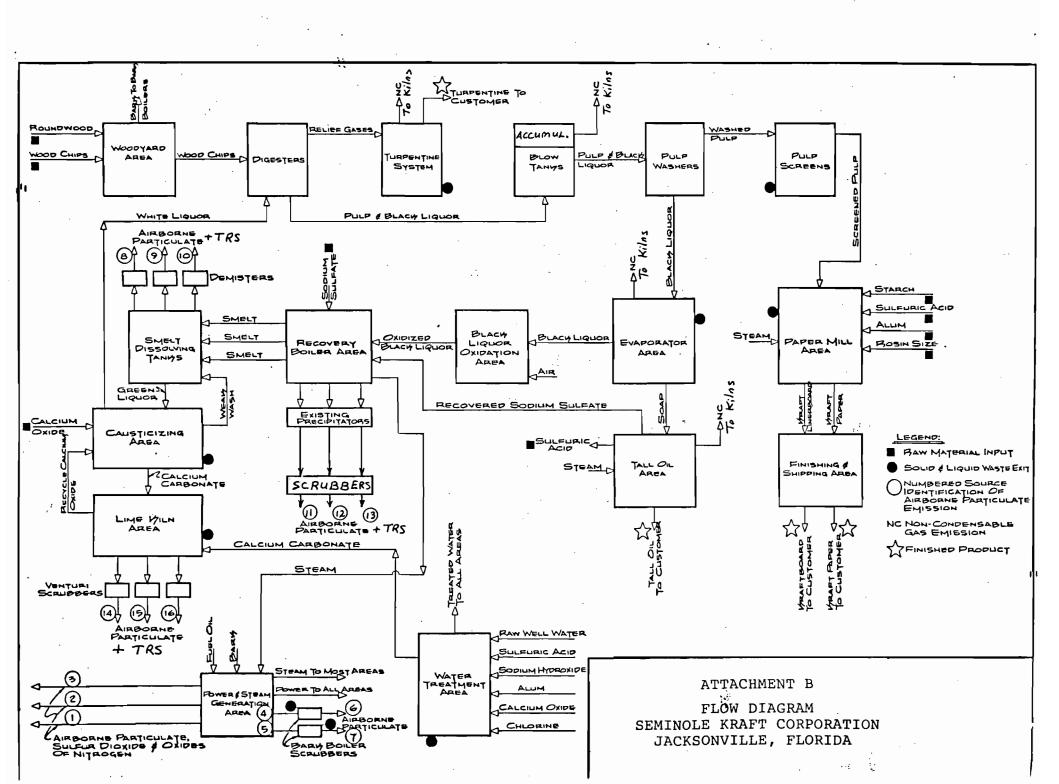
ATTACHMENT A

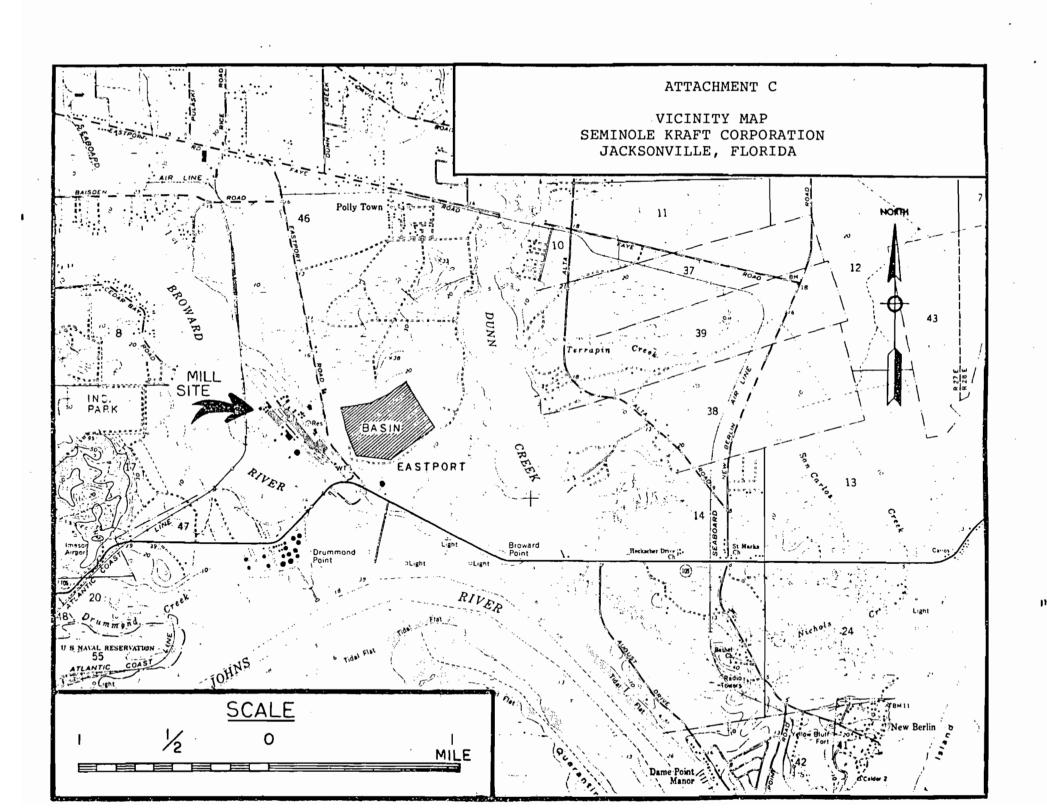
Lime Kiln No.2 Construction Permit Application

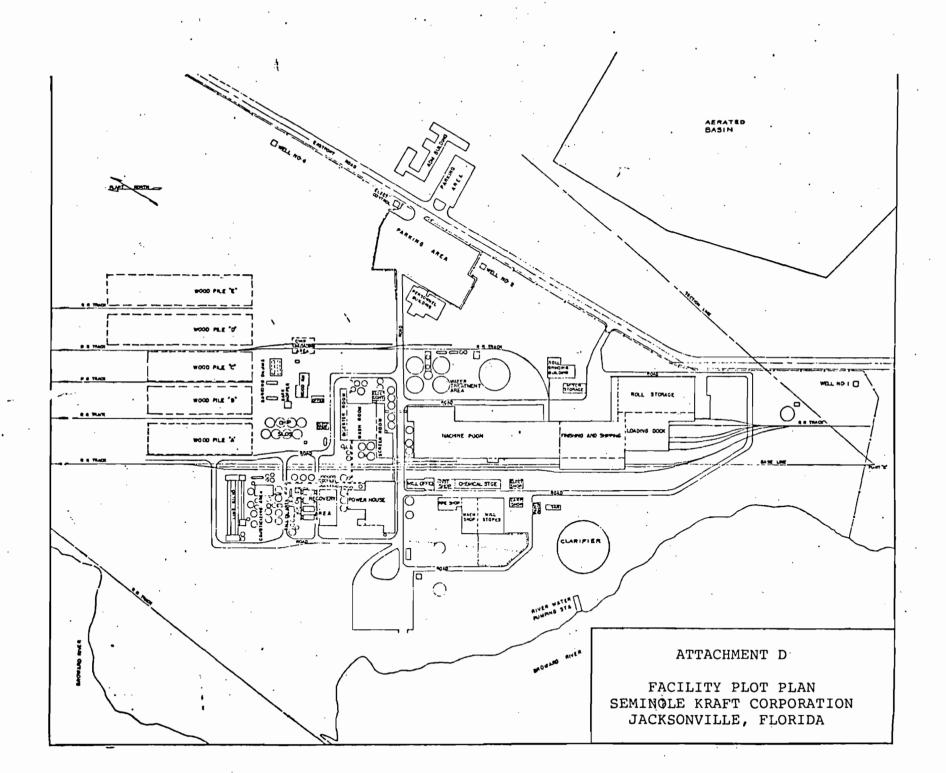
Lime Kiln No.2 is currently equipped with a mud filter and exit gas scrubber. The mud filter showers and scrubber make-up are supplied from the pulp mill hot condensate system (from the blow heat accumulators). The current mud filter on Lime Kiln No.2 is too small to provide adequate sulfide removal 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.

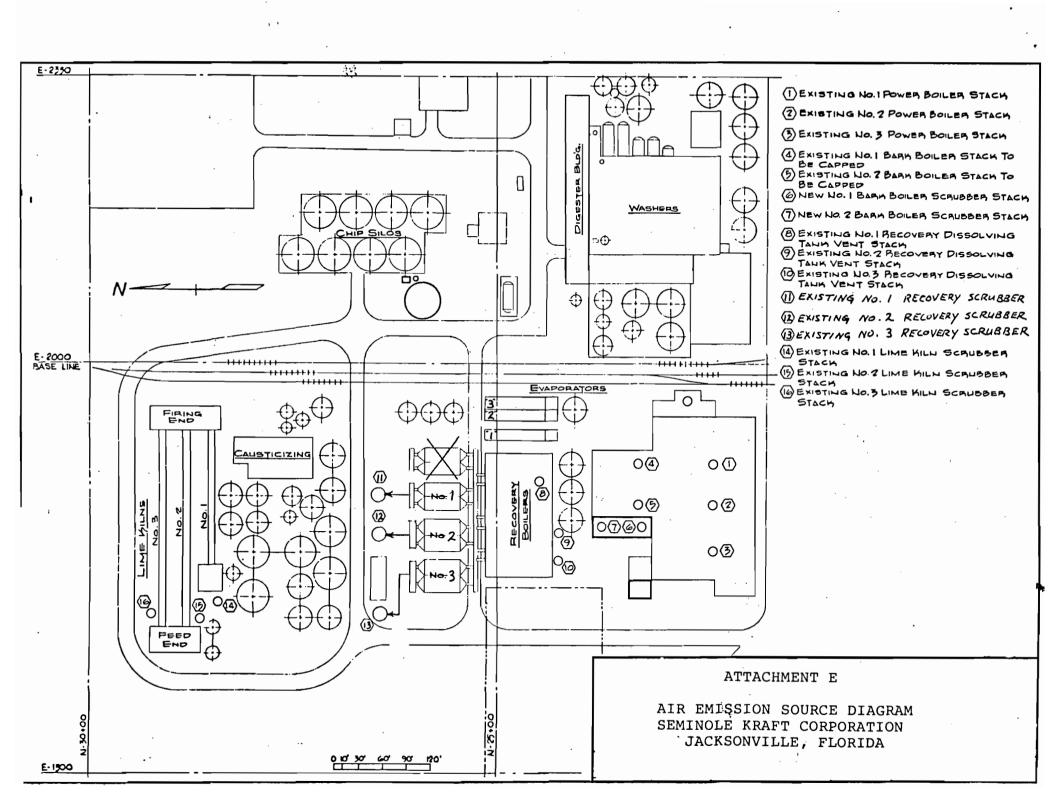
This construction permit will cover the installation of a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up. The new filter will be an 10 foot diameter, 14 foot long filter (purchased new) replacing the existing 6 foot diameter, 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.









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:

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

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION AC 16-141793 DER

NORTHEAST DISTRICT

3426 BILLS ROAD JACKSONVILLE, FLORIDA 32207 Control of State S



NOV 12 1987

BOB GRAHAM GOVERNOR VICTORIA J. TSCHINKEL SECRETARY

(904) 396-6959 (904) 396-6959	18	MAKEN E	BAQM	ERNESTE FREY DISTRICT MANAGER
Seere on E	APPLICATION TO OPERAT		_	s
- 1864 Same Same	Air Pollution [X] Construction [] Operation []	Modification	Y•
Identify the spec	Seminole Kraft Corpora ific emission point so enturi Scrubber; Peaki	urce(s) addressed	l in this applic	ation (i.e. Lime
SOURCE LOCATION:	Street 9469 Eastpo	ort Road		Jacksonville
APPLICANT NAME AN	Latitude <u>30° 25</u> ' D TITLE: <u>T. Frank Lee</u> ,			_° _36_' _00_''\\
APPLICANT ADDRESS	P.O. Box 26998 SECTION I: STATEM			.18
	rsigned owner or autho	· ·		
permit are tro I agree to m facilities in Statutes, and also understa	t the statements made ue, correct and comple aintain and operate to such a manner as to all the rules and reg nd that a permit, if gomptly notify the depart	te to the best of the pollution con comply with the ulations of the d granted by the do	my knowledge and trol source and provision of Clepartment and repartment, will	nd belief. Further, d pollution control Chapter 403, Florida evisions thereof. I be non-transferable
*Attach letter of	authorization	Signed:T. Frank	Lee , General d Title (Please	Manager
			37 Ielephone N	

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

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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.
	Signed John T. M. Vinne P. E. Williams
	John T. McKinnon, P.E.
	Name (Please Type)
	Stone Container Corporation
	Company Name (Please Type)
	2150 Parklake Drive, Suite 400, Atlanta, GA Mailing Address (Please Type)
10	rida Registration No. 37697 Date: 11-11-87 Telephone No. (404) 621-6709
	SECTION II: GENERAL PROJECT INFORMATION
Α.	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
8.	Schedule of project covered in this application (Construction Permit Application Only)
	Start of Construction <u>Sept 12, 1988</u> Completion of Construction <u>Sept 12, 1989</u>
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
Ο.	Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.
	Operating Permit A016-71214
DE R	Form 17-1.202(1)
	ective October 31, 1982 Page 2 of 12

f power plant, hrs/yr; if seasonal, describe:	
f this is a new source or major modification, answer the following quest Yes or No)	ions.
. 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.	
. Does best available control technology (BACI) apply to this source? If yes, see Section VI.	
. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII.	·
. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source?	-
. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source?	
o "Reasonably Available Control Technology" (RACI) requirements apply o 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.	

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

Raw Materials and Chemicals Used in your Process, if applicable:

	Contam	<u>i</u> nants	Utilization			
Description	Туре	% Wt	Rate - lbs/hr	Relate to Flow Diagram		
Lime Kiln	NA	NA	32,000	16		
				·		
. <u>.</u>						
				, .		

В.	Pro	cess Rate, if applicable:	(See Section V, Item 1)
	1.	Total Process Input Rate	(lbs/hr): 32,000 lbs/hr (Dry Basis)
	2	Product Waight (lbs/br).	16.300 lbs CaO/br (Dry Basis)

Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of	Emission ¹		Allowed ² Emission Rate per	Allowable ³ Emission	Potenti Emissi	Relate to Flow	
Contaminant	Maximum lbs/hr	Actual T/yr	Rule , 17-2	:lbs/hr	lbs/yr	T/yr	Diagram
Particualte	16	63	(a) E=3.59P 0.62	16	(b) 8,212,500	4,106	16
Visible Emiss	ions	NA	10% Opacity	NA	NA	1	,
TRS		NA	(d) 20 ppm	NA	(c) 1,218,735	609	
					·.	_	

¹ See Section V, Item 2.

 $\frac{4.2 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{795 \text{ tons}}{\text{day}} \times \frac{365 \text{ Days}}{\text{year}} = \frac{1,218,735 \text{ lbs TRS}}{\text{year}} = \frac{609}{\text{year}}$ b) AP-42 c) EPA 450/2-78-003b

d) 17-2.600(4)(c)(5)

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²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - O.1 pounds per million BTU heat input)

³Calculated 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)

Đ.	Control	Devices	(See Section V. Item 4	١
υ·	CONCLUI	DEATERS:	(Jee Jection 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
Mud Filter	TRS	*	NA	See Attachment
·				:
				-
				
			<u> </u>	
* Will meet applicable	emission limits			

£. Fuels

	Consu	mption*		
Type (Be Specific)	avg/hr	avg/hr max./hr		
No.6 Fuel Oil	289 GPH	400 GPH	60	
		ļ		
<u> </u>				

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

Fue	1	۸.		١.	. ~	:	_		
rue	1	- 14	пa	1 4	S	1	S	:	

Percent Sulfur:	2.27	·	Percent Ash:	0.048		
Density:	8.0	lbs/gal				
Heat Capacity:	18,750	BTU/1b	150,0	00		BTU/gal
Other Fuel Contam	inants (which may	cause air p	ollútion):			
					·	
F. If applicable	, indicate the pe	rcent of fue	l used for spac	e heating.		
Annual Average	NA	Ma	ximum			
G. Indicate liqu	id or solid waste	s generated	and method of d	isposal.		
Dust recov	ered by the setub	ber is recyc	led back to kil	n. The wat	er is used	in
the liquor	make up cycle.					
		<u>-</u>				

H. Emission	Stack G	eometry and	Flow Cha	ıracteris	tics (Pr	rovide			
Stack Height	:	75.25		ft.	Stack Di	iamete	er:	.7 	ft.
Gas Flow Rat	e: <u>22</u> ,	275_ACFM_1	4,189	_DSCFM	Gas Exit	: Темр	erature:	150	ºF.
Water Vapor	Content:		26	%	Velocity	/: <u></u>		35	FPS
					•				
		SECT	ION IV:	INCINERA	TOR INFO	RMATI	ON	NA	
Type of Waste (Type O Plastics	1 ''						Type V s (Solid By-	
Actual lb/hr Inciner- ated									
Uncon- trolled (lbs/hr)									
Description	of Waste			· · · · · · · · · · · · · · · · · · ·			<u> </u>		
Total Weight							,		
Approximate									
Manufacturer					,	,		· /	
Date Constru					1 No.				
baco comocia								,	
		Volume (ft) ³		elease /hr)	Туре	Fuel	BTU/hr	Temperatu (°F)	re
Primary Cha	mber								
Secondary C	hamber								
Stack Height	:	ft.	Stack Dia	mter:			Stack	Temp.	_
Gas Flow Rat									
*If 50 or mo dard cubic f	re tons p	per day des	ign capac	ity, sub	mit the				
Type of poll	ution co	ntrol devic	e: [] C	yclone	[]Wet	Scrub	ber []A	fterburner	
			[]0	ther (sp	ecify)				
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	See A	ttachment A		 	
	•				
h, etc.):Water_is_u	sed in the li	qu <u>or make up c</u>	vcle.	 	
·				 ·	
			·	 ·	- 412

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

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 B 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 ll" 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.

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See Attachments D & E
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3.

- 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 AVAILAB	BLE CONTROL TECHNOLOGY NA
Α.	Are standards of performance for new staticapplicable to the source?	onary sources pursuant to 40 C.F.R. Part 6
	[] Yes [] No	
	Contaminant	Rate or Concentration
В.	Has EPA declared the best available contro yes, attach copy)	ol technology for this class of sources (I
	[] 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).
 - Control Device/System:

2. Operating Principles:

3. Efficiency:*

4. Capital Costs:

*Explain method of determining

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					+-	
	5.	Useful Life:		6.	Operating Costs:	
	7.	Energy:		8.	Maintenance Cost:	
	9.	Emissions:				
		Contaminant			Rate or Concentration	
						· · · · · · · · · · · · · · · · · · ·
	10.	Stack Parameters				منيه.
	a.	Height:	ft.	b.	Diameter:	ft.
	c.	Flow Rate:	ACFM	d.	Temperature:	°F.
	е.	Velocity:	FPS		•	
٤.		cribe the control and treatment additional pages if necessary).	techn	olog	y available (As many types as	applicable,
	1.	•	٠.			
	а.	Control Device:		b.	Operating Principles:	
	c.	Efficiency: 1		d.	Capital Cost:	
	е.	Useful Life:		f.	Operating Cost:	
	g .	Energy: ²		h.	Maintenance Cost:	
	i.	Availability of construction ma	teria	ls an	nd process chemicals:	
	j.	Applicability to manufacturing	proces	sses:		
	k.	Ability to construct with contract within proposed levels:	rol de	vice	, install in available space,	and operate
	2.					
	а.	Control Device:		b.	Operating Principles:	
	c.	Efficiency: 1		. d.	Capital Cost:	
	е.	Useful Life:		f.	Operating Cost:	
	g.	Energy: ²		h.	Maintenance Cost:	
	i.	Availability of construction ma	teria	ls an	nd process chemicals:	
1 _{Ex} 2 _{En}	plai ergy	n method of determining efficien to be reported in units of elec	cy. trical	l pow	ver – KWH design rate.	

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Applicability to manufacturing processes: j. k. Ability to construct with control device, install in available space, and operate within proposed levels: 3. Control Device: Operating Principles: а. Efficiency: 1 Capital Cost: c. Useful Life: Operating Cost: e. Energy: 2 g. h. Maintenance Cost: Availability of construction materials and process chemicals: ... Applicability to manufacturing processes: j. k. Ability to construct with control device, install in available space, and operate within proposed levels: 4. Control Device: b. Operating Principles: Efficiency: 1 Capital Costs: с. d. Useful Life: Operating Cost: e. Energy: 2 g. h. Maintenance Cost: Availability of construction materials and process chemicals: i. Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: F. Describe the control technology selected: 1. Control Device: Efficiency: 1 2. 3. Capital Cost: Useful Life: Operating Cost: Energy: 2 Maintenance Cost: Manufacturer: Other locations where employed on similar processes: (1) Company: (2) Mailing Address: (3) City: (4) State: ¹Explain method of determining efficiency. 2 Energy to be reported in units of electrical power - KWH design rate. DER Form 17-1.202(1)

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	(5) Environmental Manager:		•	
	(6) Telephone No.:			
	(7) Emissions: 1	-		
	Contaminant		Rate or Concentral	tion
	·			
	(8) Process Rate: 1			
	b. (1) Company:			923a 974
	(2) Mailing Address:			
	(3) City:	(4) St	ate:	
	(5) Environmental Manager:		`	
	(6) Telephone No.:			
	(7) Emissions: ¹			
	Contaminant		Rate or Concentrat	ion
				····
	(8) Process Rate: 1			•
	10. Reason for selection and d	escription of syst	ems:	
l _{Ap} av	plicant must provide this informations at a state the provide the state the provide that the state the state that the state the state that th	nation when availa e reason(s) why.	ble. Should this inf	ormation not b
	SECTION VII - PR	EVENTION OF SIGNIF	ICANT DETERIORATION	NA
Α.	Company Monitored Data			
	lno. sites	TSP	() S0 ² *	Wind spd/dir
	Period of Monitoring	// nonth day yea	to // r month day year	:
	Other data recorded			
	Attach all data or statistical	summaries to this	application.	٠.
* 5p	ecify bubbler (B) or continuous	(c).		
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Ξ.

	2.	Instrumentation, Field a	nd Laboratory					
	a.	Was instrumentation EPA	referenced or its	equivalent?	[] Yes	[] No		
	b.	Was instrumentation cali	brated in accordan	ce with Dep	artment p	rocedures?		
		[] Yes [] No [] Unk	n o wn					
3.	Met	eorological Data Used for	Air Quality Model	ing		·.		
	1.	Year(s) of data fr	om / / month day yea	to month	/ / day yea	<u>-</u> ' '		
	2.	Surface data obtained fr	om (location)					
	3.	Upper air (mixing height) data obtained fr	om (locatio	n)			
	4.	Stability wind rose (STA	R) data obtained f	rom (locati	on)			
:.		puter Models Used						
	l.			Modified?	If yes,	attach des	cripti	on.
	2.							
	3.	·				-		
	4.		· · · · · · · · · · · · · · · · · · ·	Modified?	If yes,	attach des	cripti	on.
		ach copies of all final m le output tables.						
).	Арр	licants Maximum Allowable	Emission Data					
	Pol	lutant	Emission Rate					
		TSP		gr	ams/sec		•	
		so ²		gr	ams/sec			
	Emi	ssion Data Used in Modeli	ng			•		
	4 L L			• _ 4	:			

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UIM coordinates, stack data, allowable emissions, and normal operating time.

- Attach all other information supportive to the PSD review. F.
- 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.
- 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.

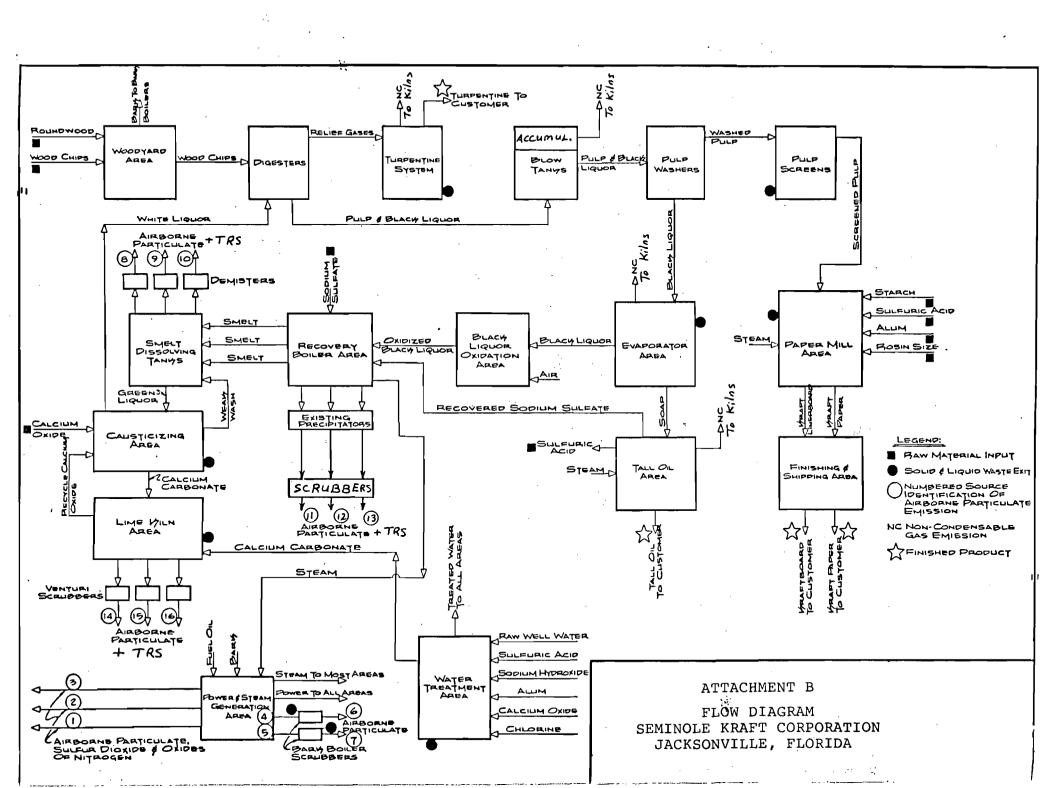
ATTACHMENT A

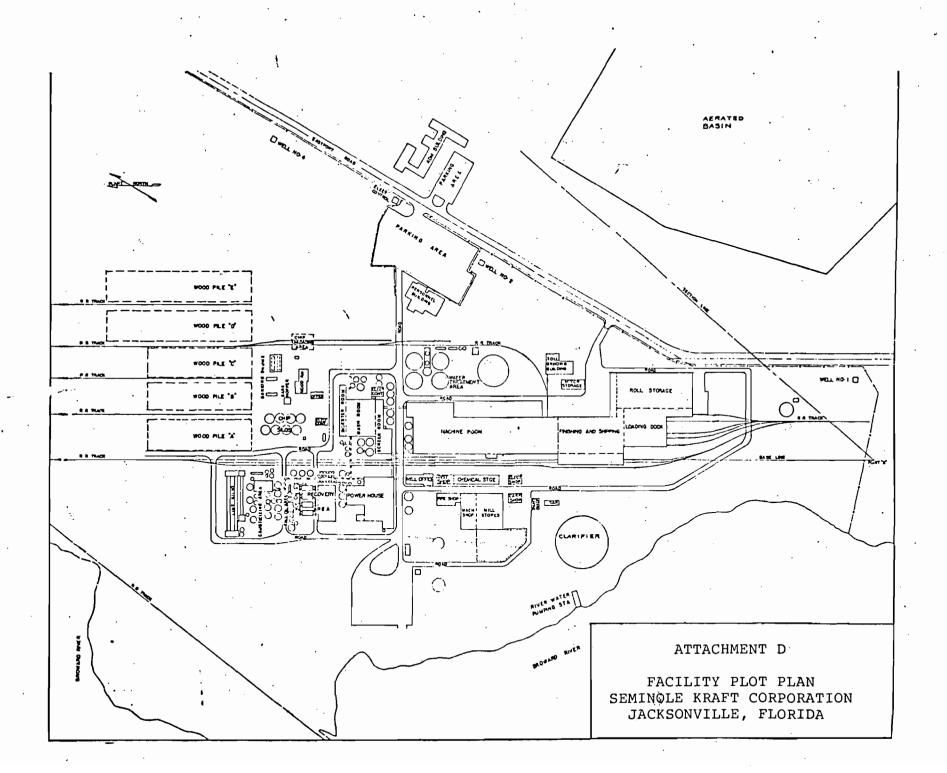
Lime Kiln No.3 Construction Permit Application

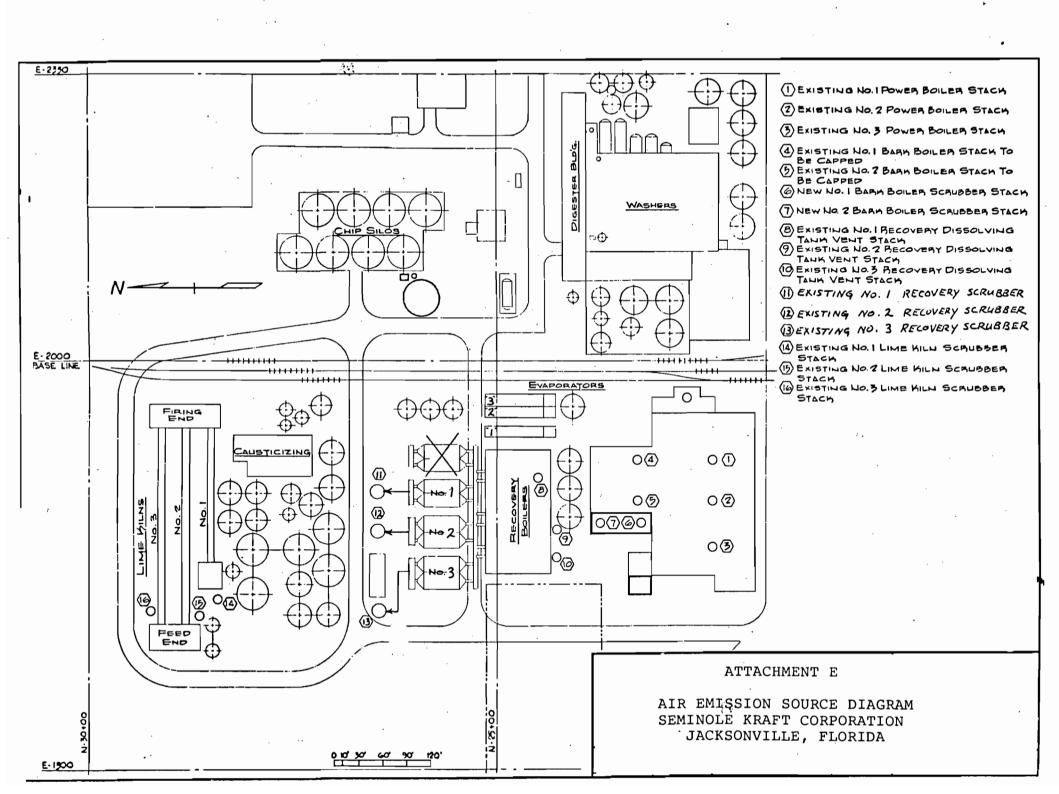
Lime Kiln No.3 is currently equipped with a mud filter and exit gas scrubber. The mud filter showers and scrubber make-up are supplied from the pulp mill hot condensate system (from the blow heat accumulators). The current mud filter on Lime Kiln No.3 is too small to provide adequate sulfide removal 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.







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:

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

BEST AVAILABLE COPY

STATE OF FLORIDA

Pd. \$1000.00 1# 0905 Ruceip+ #76193

DEPARTMENT OF ENVIRONMENTAL REGULATION AC 16-141798

NORTHEAST DISTRICT



DER

NORTHEAST DISTRICT	Or ENVIR	CAMENIAI PE	DER	BOB GRAHAM GOVERNOR
3426 BILLS ROAD JACKSONVILLE, FLORIDA 32207 (904) 396 (1959)	SEPARATE SEP	NC	OV 12 1987	VICTORIA J. TSCHINKEL SECRETARY ERNEST E FREY
The Control of the Co	STAIR OF	FLORION	BAOM	DISTRICT MANAGER
10012 .08 E	APPLICATION TO OPERATE/O	CONSTRUCT AIR POLLUT	ION SOURCES	
SOURCE TYPE: Air I	Pollution	[] New ¹ [x] 1	Existing ^l	
VAPPLICATION TYPE:	[X] Construction [] (Operation [] Modif	ication	
COMPANY NAME:	Seminole Kraft Corporati	Lon	COUNTY:	Duva1
Identify the speci	ific emission point sour	ce(s) addressed in th	his applicat #1 and	ion (i.e. Lime o
Kiln No. 4 with Ve	enturi Scrubber; Peaking	Unit No. 2, Gas Fire	ed) #2 Batch	Digester System
SOURCE LOCATION:	Street 9469 Eastport Roa	nd	City	Jacksonville
	UTM: East 7441.75	Nor	th <u>3365.60</u>	
•	Latitude 30 ° 25 ' 15	5_"N Long	gitude <u>81</u> °	36 ' .00 ''W
APPLICANT NAME AND	TITLE: T. Frank Lee,	General Manager		·
APPLICANT ADDRESS:	P. O. Box 2699	98, Jacksonville, Flo	orida 32218	
	SECTION I: STATEMENT	S BY APPLICANT AND	ENGINEER	
A. APPLICANT				
I am the under	signed owner or authoriz	zed representative* (of <u>Seminole</u>	Kraft Corporation
permit are tru I agree to ma facilities in Statutes, and also understan	the statements made in ue, correct and complete aintain and operate the such a manner as to coall the rules and reguland that a permit, if grapmptly notify the department.	to the best of my keepollution control omply with the proving tions of the departmented by the departmente	nowledge and source and ision of Chament and revient, will b	belief. Further, pollution control apter 403, Florida isions thereof. I e non-transferable
*Attach letter of	authorization	Signed:	122	
		T. Frank Lee, G	General Manag le (Please T	ger ype)
		Date: 11/11/87 To	elephone No.	904/751-6400
B. PROFESSIONAL E	ENGINEER REGISTERED IN FO	LORIDA (where require	ed by Chapte	r 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)

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Page 1 of 12

· .	NOAS	Signed John J. M. Yman, P.E.
		John T. McKinnon, P.E. Name (Please Type)
		Name (Please Type) () () () () () () () () () (
		Company Name (Please Type)
: .		Suite 400, 2150 Parklake Dr., Atlanta, GA 30345mmmm
		Mailing Address (Please Type)
rida Regis	stration No. 37697	Date: 11/11/87
		II: GENERAL PROJECT INFORMATION
and exped	cted improvements in the project will resu	at of the project. Refer to pollution control equipment, source performance as a result of installation. State alt in full compliance. Attach additional sheet if
	C A++1	
	See Attach	ment A
	See Attachi	ment A
	See Attach	ment A
·	See Attach	ment A
	See Attach	ment A
Schedule		
	of.project covered i	n this application (Construction Permit Application Only)
	of.project covered i	n this application (Construction Permit Application Only)
Start of Costs of for indiv	of project covered i Construction May 12 pollution control sy vidual components/uni ion on actual costs s	n this application (Construction Permit Application Only)
Start of Costs of for indiv	of project covered i Construction May 12 pollution control sy vidual components/uni ion on actual costs s	n this application (Construction Permit Application Only), 1988 Completion of Construction November 12, 1989 stem(s): (Note: Show breakdown of estimated costs only ts of the project serving pollution control purposes. The hall be furnished with the application for operation
Start of Costs of for indiv	of project covered i Construction May 12 pollution control sy vidual components/uni ion on actual costs s	n this application (Construction Permit Application Only), 1988 Completion of Construction November 12, 1989 stem(s): (Note: Show breakdown of estimated costs only ts of the project serving pollution control purposes. The hall be furnished with the application for operation
Start of Costs of for indiv	of project covered i Construction May 12 pollution control sy vidual components/uni ion on actual costs s NCG System Computer Co	n this application (Construction Permit Application Only), 1988 Completion of Construction November 12, 1989 stem(s): (Note: Show breakdown of estimated costs only its of the project serving pollution control purposes. Thall be furnished with the application for operation Upgrade - \$65,000 ontrol System - \$1,985,000
Start of Costs of for indiv	of project covered i Construction May 12 pollution control sy vidual components/uni ion on actual costs s	n this application (Construction Permit Application Only, 1988 Completion of Construction November 12, 1989 stem(s): (Note: Show breakdown of estimated costs only its of the project serving pollution control purposes. Shall be furnished with the application for operation Upgrade - \$65,000
Start of Costs of for indiv	of project covered i Construction May 12 pollution control sy vidual components/uni ion on actual costs s NCG System Computer Co	n this application (Construction Permit Application Only, 1988 Completion of Construction November 12, 1980 estem(s): (Note: Show breakdown of estimated costs only its of the project serving pollution control purposes. The project with the application for operation upgrade - \$65,000 ontrol System - \$1,985,000
Start of Costs of for indiv Informati permit.)	of project covered i Construction May 12 pollution control sy vidual components/uni ion on actual costs s NCG System Computer Control Total	n this application (Construction Permit Application Only, 1988 Completion of Construction November 12, 1980 stem(s): (Note: Show breakdown of estimated costs only its of the project serving pollution control purposes. The hall be furnished with the application for operation Upgrade - \$65,000 ontrol System - \$1,985,000

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· :			l, describe:		
	<u>:</u> .				
·				-	
f thi Yes o		or major modifi	cation, answer the	following questio	ns. NA
. Is	this source in a	non-attainment	area for a particu	lar pollutant?	
a.	If yes, has "off	set" been appli	e d?		424
ь.	If yes, has "Low	est Achievable	Emission Rate" beer	n applied?	· · ·
c.	If yes, list nor	-attainment pol	lutants.		
	es best available yes, see Section		ogy (BACI) apply to	o this source?	
			ficant Deterioriat: If yes, see Section		
	"Standards of Per ply to this source		w Stationary Source	es" (NSPS)	
	"National Emissic ESHAP) apply to th		Hazardous Air Pol	lutants"	
	asonably Available s source?	Control Techno	logy" (RACT) requi	rements apply ——	no
а.	If yes, for what	pollutants?			
ь.			rmation required in le 17-2.650 must bo	-	

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

	Contaminants		Utilization		
Description	Туре	% Wt	Rate - lbs/hr	Relate to Flow Diagram	
Wood Chips	NA	NA	580,000	21 & 22	
Black & White Liquor			898,000		
Note: As No. 1	and No. 2 Batch	digester sy	stems vary in pro	portion to total process	
average operating	conditions.	ormacron rep	resents the total	s of both systems under	

В.	Pro	Process Rate, if applicable: (See Section V, Item 1)	
	1.	1. Total Process Input Rate (lbs/hr): 1,478,000 lbs./hr	
	2.	2. Product Weight (lbs/hr): 165,583 16 A.D. Pulp/hi	•

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of	Emission	Allowed ² Emission Rate per	Allowable ³ Emission	Potenti Emissi		Relate to Flow
Contaminant	Maximum Actual lbs/hr T/yr	Rule 17-2	lbs/hr	lbs/yr	T/yr	Diagram
TRS	NA - Incinerat	ed in lime ki	lns	7,615,178	3808	21 & 22

¹See Section V. Item 2.

EPA - 450/2-78-003 b

²Reference 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)

³Calculated from operating rate and applicable standard.

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

D.	Control	Devices:	(See	Section	٧.	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%	NANA	See attachment A
Lime Kiln	<u> </u>			
·				-
,				

E. Fuels NA

	Consum	otion*	
Type (Be Specific)	avg/hr	max./hr	Maximum Heat Input (MMBTU/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:	
leat Capacity:	BTU/1b		BTU/gal
ther Fuel Contaminants (which may cau	se air p	ollution):	
· · · · · · · · · · · · · · · · · · ·			
. If applicable, indicate the percen	t of fue	l used for space heating. NA	•
F. If applicable, indicate the percen			
	Ma	ximum	
Annual Average	Ma	and method of disposal.	and black

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waste treatment system. Sludge from waste treatment system is disposed in on-site landfill.

	See L	<u>imeKiln</u>		ft.	Stack Di	amete	r:	f
as Flow Rate:		ACFM		_DSCFM	°F			
ater Vapor Con	tent:			۵ م	Velocity	· ·:		F
					•	•	ONNA	
	pe O stics)		Type II (Refuse)		- 1		Type V (Liq.& Gas By-prod.)	Type VI s (Solid By-prod.
Actual lb/hr Inciner- ated								
Uncon- trolled (lbs/hr)								
escription of	.——_⊥ Waste			· .				
escription of								(hc)
otal Weight In	cinera	ted (lbs/h	r)		Desig	n Cap	acity (lbs/	
otal Weight In pproximate Num	cinera ber of	ted (lbs/h	r)	per da	Desig	n Cap	acity (lbs/	/hr)wks/yr
otal Weight In pproximate Num anufacturer	cinera ber of	ted (lbs/h	r)Operation	per da	Desig	day/	acity (lbs/wk	wks/yr
otal Weight In pproximate Num anufacturer	cinera ber of	ted (lbs/h	r)Operation	per da	Desig	day/	acity (lbs/wk	
otal Weight In pproximate Num anufacturer	cinera ber of	ted (lbs/h	r)Operation	per daMod	Desig	day/	acity (lbs/wk	wks/yr
otal Weight In pproximate Num anufacturer ate Constructe	cinera ber of d	ted (lbs/h Hours of !	r) Operation Heat R	per daMod	Desigyel No	n Cap	acity (lbs/	wks/yr
otal Weight In pproximate Num anufacturer ate Constructe Primary Chambe	cinera ber of d	ted (lbs/h Hours of !	r) Operation Heat R	per daMod	Desigyel No	n Cap	acity (lbs/	wks/yr
otal Weight In pproximate Num anufacturer ate Constructe Primary Chambe	cinera ber of d r ber	ted (lbs/h Hours of t Volume (ft) ³	r) Operation Heat R (BIU	per da Mod elease /hr)	Desigyel No	n Cap	acity (lbs/wkBTU/hr	Temperature (°F)
otal Weight In oproximate Num anufacturer ate Constructe Primary Chambe Gecondary Cham tack Height: _	cinera ber of	Volume (ft)	Heat R (BTU	per daMod elease /hr) mter:	Desigyel No	n Cap	BIU/hr Stack I	Temperature (°F)
otal Weight In pproximate Num anufacturer ate Constructe Primary Chambe Secondary Cham tack Height: _ as Flow Rate:	cinera ber of d r ber tons p	Volume (ft) ³ er day des	Heat R (BTU	per daMod elease /hr) mter:	Desigy	Fuel	BIU/hr Stack I	Temperature (°F)

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4,					
					 منار. . سنگ مس ب

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

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9.	The appropriate application fee in accormade payable to the Department of Environ	dance with Rule 17-4.05. The check should be nmental Regulation.
10.		t, attach a Certificate of Completion of Con- as constructed as shown in the construction
	SECTION VI - OFST AVAIL	ARLE CONTROL TECHNOLOGY NA
		LABLE CONTROL TECHNOLOGY NA
Α.	Are standards of performance for new sta applicable to the source?	tionary sources pursuant to 40 C.F.R. Part 60
	[] Yes. [] No	
	Contaminant	Rate or Concentration
В.	Has EPA declared the best available conves, attach copy)	trol technology for this class of sources (If
	[] Yes [] No	
	Contaminant	Rate or Concentration
		· · · · · · · · · · · · · · · · · · ·
	What emission levels do you propose as be	est available control technology?
	Contaminant	Rate or Concentration
	· · · · · · · · · · · · · · · · · · ·	
D.	Describe the existing control and treatme	ent technology (if any).
	1. Control Device/System:	2. Operating Principles:
	3. Efficiency:*	4. Capital Costs:
* E x ;	plain method of determining	·
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:

	5.	Useful Life:		6.	Operating Costs:	
	7.	Energy:		8.	Maintenance Cost:	
	9.	Emissions:				
		Contaminant			Rate or Concentration	
		· · · · · · · · · · · · · · · · · · ·				
		·	_			
		5	- 			
	10.	Stack Parameters				- 1 tipe
	а.	Height:	ft.	ь.	Diameter:	ft.
	с.	Flow Rate:	ACFM	d.	Temperature:	of.
	е.	Velocity:	FPS			
Ε.		cribe the control and treatment additional pages if necessary).	techn	olog	y available (As many types as	applicable,
	1.		٠.			
	a.	Control Device:		ь.	Operating Principles:	
	c.	Efficiency: 1		d.	Capital Cost:	
	е.	Useful Life:		f.	Operating Cost:	
	g.	Energy: ²		h.	Maintenance Cost:	
	i.	Availability of construction ma	terial	s an	d process chemicals:	
	j.	Applicability to manufacturing	proces	ses:		
	k.	Ability to construct with contr within proposed levels:	rol de	vice	, install in available space,	and operate
٠	2.					
	а.	Control Device:		ь.	Operating Principles:	
	c.	Efficiency: 1		d.	Capital Cost:	
	е.	Useful Life:		f.	Operating Cost:	
	g .	Energy: 2		h.	Maintenance Cost:	
	i.	Availability of construction ma	terial	s an	d process chemicals:	

Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: 3. Control Device: Operating Principles: b. Efficiency: 1 d. Capital Cost: Useful Life: f. Operating Cost: Energy: 2 g. Maintenance Cost: i. Availability of construction materials and process chemicals: ----Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: 4. а. Control Device: Operating Principles: Efficiency: 1 d. Capital Costs: c. Useful Life: f. Operating Cost: Energy: 2 h. Maintenance Cost: q. Availability of construction materials and process chemicals: i. Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: Describe the control technology selected: Efficiency: 1 1. Control Device: 2. 3. Capital Cost: Useful Life: 5. Operating Cost: 6. Energy: 2 7. Maintenance Cost: Manufacturer: Other locations where employed on similar processes: a. (1) Company: (2) Mailing Address: (4) State: (3) City: ¹Explain method of determining efficiency. 2 Energy to be reported in units of electrical power - KWH design rate. DCR Form 17-1.202(1)

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		•				
	(5) Environmental Manager:					
	(6) Telephone No.:					
	(7) Emissions: 1					
	Contaminant			Rate or Conce	entration	
	· · · · · · · · · · · · · · · · · · ·				·	
						-
	(8) Process Rate: 1					
	b. (1) Company:					-glas
	(2) Mailing Address:					
	(3) City:		(4) State:			
	(5) Environmental Manager:					
	(6) Telephone No.:					
	(7). Emissions: 1					
	Contaminant	٠.		Rate or Conce	ntration	5
	(8) Process Rate: 1					<u> </u>
	lO. Reason for selection and	description	of systems:			
	plicant must provide this info ailable, applicant must state t			Should this	informatio	on not b
	SECTION VII - P	REVENTION O	F SIGNIFICAN	T DETERIORATIO	N NA	
١.	Company Monitored Data					
	1no. sites					pd/dir
	Period of Monitoring	month d	/ to	month day	/ year	
	Other data recorded			-		
	Attach all data or statistical	summaries	to this appli	ication.		
Sρ	ecify bubbler (B) or continuous	(C).				
)ER	Form 17-1.202(1)					

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	2.	Instrumentation	n, Field and La	boratory							
	a.	Was instrument:	ation EPA refer	enced or its	equivalent?	[] Yes	[] N	0			
	b. Was instrumentation calibrated in accordance with Department procedures?										
		[] Yes [] N	o [] Unknown								
в.	Met	Meteorological Data Used for Air Quality Modeling									
	1.	Year(s)	of data from mo	nth day yea	to/	day yea	r				
	2.	Surface data o	btained from (1	ocation)		· · · · · · · · · · · · · · · · · · ·					
	3.	Upper air (mix	ing height) dat	a obtained fi	com (location	ı)					
	4.	Stability wind	rose (STAR.) da	ta obtained f	rom (locatio	on)					
c.	Com	Computer Models Used									
	1.		<u> </u>	· 	Modified?	If yes,	attach	description.			
	2.				Modified?	If yes,	attach	description.			
	3.				Modified?	If yes,	attach	description.			
	4.				Modified?	If yes,	attach	description.			
		each copies of a ole output tables		runs showing	input data,	receptor	locati	ons, and prin-			
D.	Арр	olicants Maximum	Allowable Emis	sion Data		*.					
	Pol	.lutant	Emis	sion Rate							
		159			gra	ms/sec					
		502			gra	ms/sec					
Ε.	Emi	ssion Data Used	in Modeling								
	Att	ach list of emis	ssion sources.	Emission dat	a required i	s source	name, d	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.
- 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, jour-nals, and other competent relevant information describing the theory and application of the requested best available control technology.

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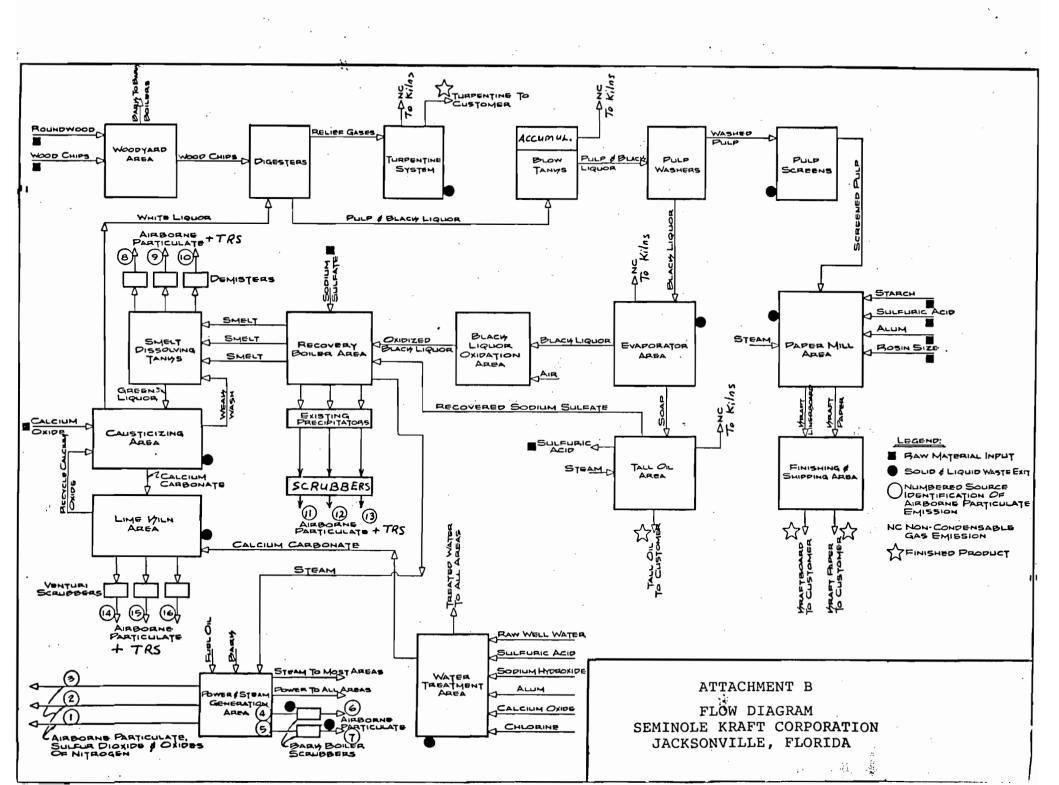
ATTACHMENT A

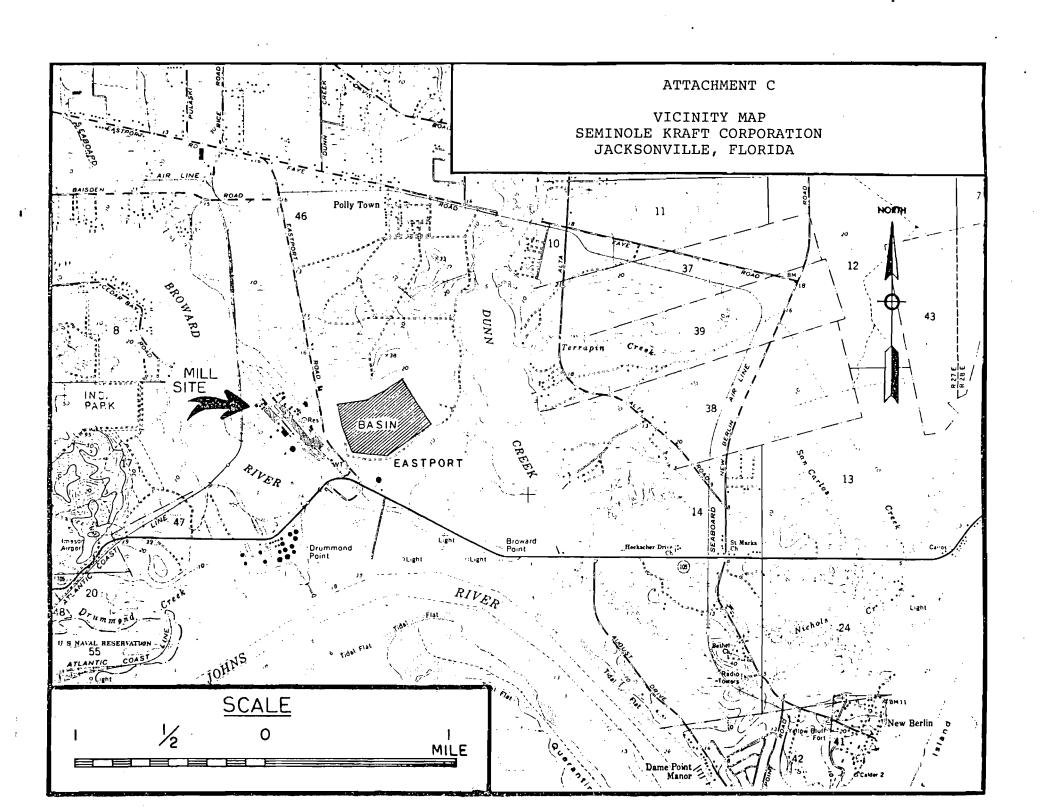
No.1 and 2 Batch Digester Systems Construction Permit Application

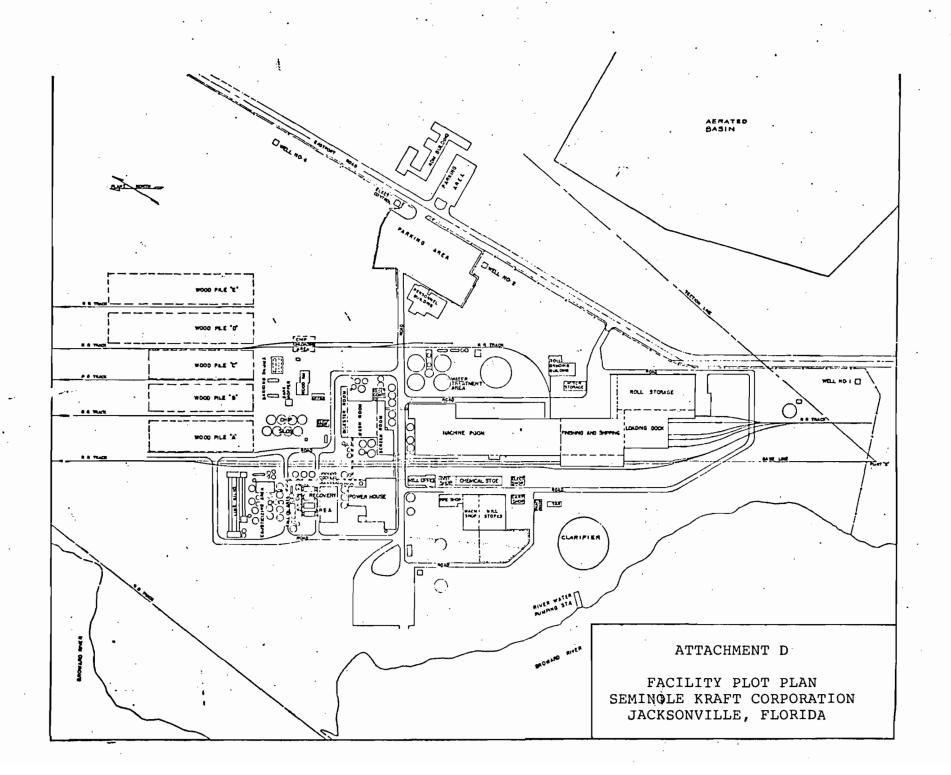
TRS emissions from No.1 and 2 Batch Digester Systems are currently controlled by collection in an existing non-condensible gas (NCG) system and incineration in either of No.2 or No.3 Lime Kilns. The use of lime kilns to achieve complete destruction of TRS compounds is a recognized technology that is 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 timerequired 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.

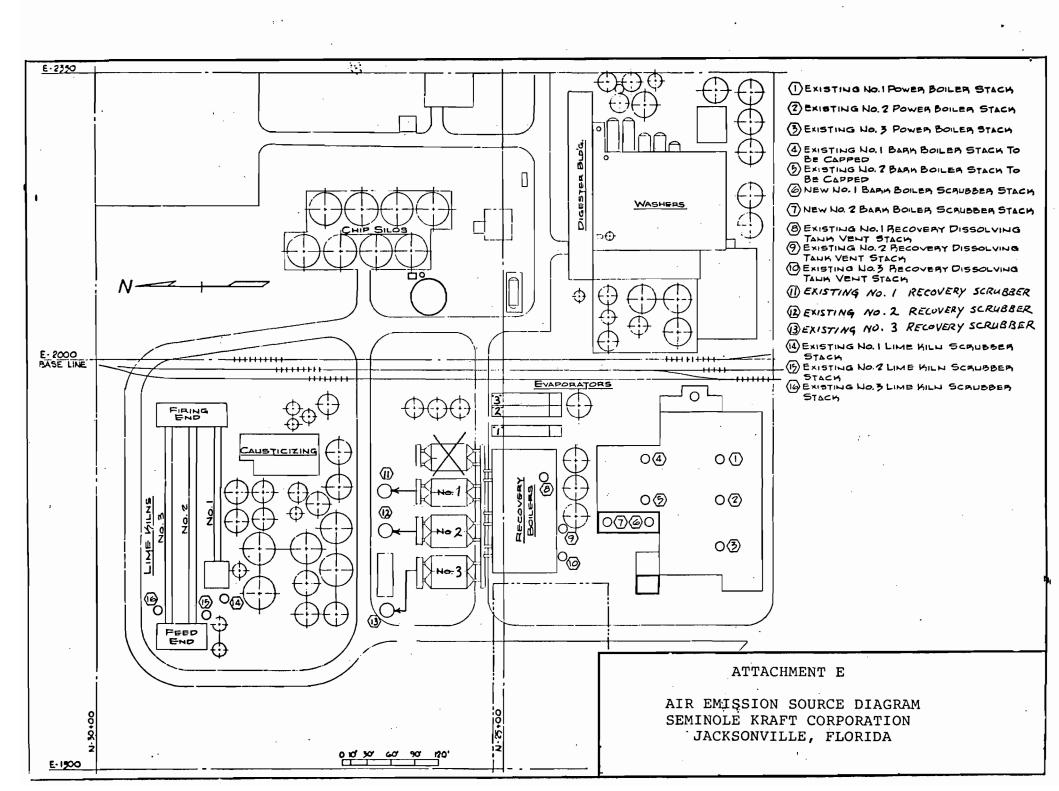
This construction permit covers installation of a pulp mill computer control system and an upgrade of the existing NCG System. A computer control system will be installed in the pulp mill digester area to control and sequence the digester cooks and blows. This system will smooth out the flows of non-condensible 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.









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:

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

BEST AVAILABLE COPY

STATE OF FLORIDA

Pd. \$1000,00 1 # 7393 Receipt # 76193

DEPARTMENT OF ENVIRONMENTAL REGULATION - 141799

DER

NORTHEAST DISTRICT

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



NOV 12 1987

BOB GRAHAM GOVERNOR VICTORIA J. TSCHINKEL SECRETARY

DACA

LRNEST E FREY DISTRICT MANAGER

Carlotte Control of Control	Barrier V	STATE OF FLORIDA	BAQIVI
	APPLICATION TO OPER	ATE/CONSTRUCT AIR	POLLUTION SOURCES
5 YO SAYYY 1 - 1	Pollution	[] New ¹	[x] Existing ¹
APPLICATION TYPE:	[X] Construction	[] Operation []	Modification
COMPANY NAME:	Seminole Kraft Corp	ooration	COUNTY: Duval
Identify the specif	fic emission point	source(s) addresse	d in this application (i.e. Lime
			as Fired)#1 Line Multi-Effect
SOURCE LOCATION:	Street 9469 Eastpo	ort Road	Evaporators City <u>Jacksonville</u>
1	UTM: East 7441.7	⁷⁵	North 3365.60
,	Latitude 30 ° 25	5 ' 15 ''N	Longitude 81 ° 36 ' 00"W
APPLICANT NAME AND	TITLE: T. Frank I	ee, General Manage	r
APPLICANT ADDRESS:	P. O. Box 26998	3, Jacksonville, Fl	orida 32218
	SECTION 1: STAT	EMENTS BY APPLICAN	T AND ENGINEER
A. APPLICANT			
I am the unders	signed owner or aut	horized representa	tive* of Seminole Kraft Corporation
permit are true I agree to ma facilities in Statutes, and a also understand and I will propestablishment.	e, correct and compintain and operate such a manner as all the rules and r d that a permit, inptly notify the de	lete to the best of the pollution contour with the egulations of the figranted by the department upon sale	ion for a construction f my knowledge and belief. Further, ntrol source and pollution control provision of Chapter 403, Florida department and revisions thereof. epartment, will be non-transferable or legal transfer of the permitted
*Attach letter of a	authorization	Signed:	- Har
			ee, General Manager nd Title (Please Type)
		Date: 11/13	1/87 Telephone No. 904/751-6400
B. PROFESSIONAL EN	NGINEER REGISTERED	IN FLORIDA (where	required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project havbeen 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

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

	the pollution control facilities, when properly maintained and operated, will discharg
	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 bylthe owner, the applicant a set of instructions for the prope maintenance and operation of the pollution control facilities and, if applicable pollution sources, if the pollution sources, if the pollution sources, if the property is the property of the property is the property of the property is the property of the property
	pollution sources
	Signed John T. M. Kinner P. E. S. 1819
	John T. McKinnon, P.E.
	Name (Please Type)
	Stone Container Corporation
	Company Name (Please Type) 次分子分子
	Suite 400, 2150 Parklake Drive, Atlanta, GA 30040000000000000000000000000000000000
	Mailing Address (Please Type)
Flo	rida Registration No. 37697 Date: 11/11/87 Telephone No. 404/621-6709
1 10	retephone No Date: retephone No
	SECTION II: GENERAL PROJECT INFORMATION
Α.	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
	•
в.	Schedule of project covered in this application (Construction Permit Application Only)
	Start of Construction <u>complete</u> <u>Completion of Construction</u> <u>complete</u>
с.	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)
	(cost covers dir emes)
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
	Form 17-1.202(1)
r. T T	ective October 31, 1982 Page 2 of 12

	this is a new source or major modification, answer the following questes or No)	ions.
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?	
	"Reasonably Available Control Technology" (RACT) requirements apply this source?	
	a. If yes, for what pollutants?	

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:

	Contam.	inants	Utilization	· .
Description	Type	% Wt	Rate - lbs/hr	Relate to Flow Diagram
15% Black Liquor	NA	NA	330,000	18 .
		·····		7:

R	Process	Rate	i f	applicable:	(500	Section V	Item 1	١
о.	rrucess	nate,	11	abbircanie:	(366	Jection A	, ILEN I	. ,

1	Intal Process	Innut Rate	(lhe/hr).	330,000 1bs/hr @ 15% solids	

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of	£mission ¹	Allowed ² Emission Rate per	Allowable ³ Emission	Potenti Emissi	Relate to Flow	
Contaminant	Maximum Actual lbs/hr T/yr	Rule 17-2	lbs/hr	lbs/yr	T/yr	Diagram
TRS	NA - Incinerate	d in lime kil	ns	1,225,634	613	. 18
·						
				٠,		
						-

¹See Section V, Item 2.

EPA - 450/2 - 78 - 003b

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

³Calculated from operating rate and applicable standard.

 $^{^4}$ Emission, if source operated without control (See Section V, Item 3).

D.	Control	Devices:	(See	Section	٧.	Item 4	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	TRS	∼ 100%	NA .	See Attach	ment
KIII					
					-
				· · ·	

NA · E. Fuels

Fuel Analysis: NA

	Consump		
Type (Be Specific)	avg/hr	max./hr	Maximum Heat Input _(MMBTU/hr)
		·	
· · · · · · · · · · · · · · · · · · ·	· -		

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

Percent Sulfur:	Percent Ash:
Density: lbs/gal	Typical Percent Nitrogen:

Heat Capacity: ______BTU/gal

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

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

Maximum ____ Annual Average _____

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.

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Stack Heig	ht: See	Lime Kiln		ft.	Stack Di	amete	r:	ft
								°F
Vater Vapo	r Content:			~~~~~ %	Velocity	·:		FP
,		SECT	ION IV:	INCINER/	ATOR INFO	RMATI	ON NA:	
Type of Waste	Type O (Plastics	Type I) (Rubbish)						Type VI (Solid By-prod.)
Actual lb/hr Inciner- ated								
Uncon- trolled (lbs/hr)								
escriptio	n of Waste							
otal Weig	ht Inciner	ated (lbs/h	r)		Desig	n Cap	acity (lbs/	hr)
pproximat	e Number o	f Hours of t	Operation	per day	·	day/	wk	wks/yr
lanufactur	er				•			
ate Const	ructed			Mode	el No			
		Volume (ft) ³	Heat R (BTU		Туре	Fuel	BIU/hr	Temperature (°F)
Primary C	hamber							
Secondary	Chamber							
tack Heig	ht:	ft. :	Stack Dia	mter:			Stack I	emp
as Flow R	ate:		_ACFM		DS	CFM*	Velocity: _	FP
		per day des gas correct				emiss	ions rate i	n grains per stan
ype of po	llution co	ntrol devic	e: [] C	yclone	[] Wet	Scrub	ber [] Af	terburner
			f 1 o					

Bri	ef description of operating characteristics of control devices:
	See Attachment A
	imate disposal of any effluent other than that emitted from the stack (scrubber water, , etc.):
	Contaminated condensate from hot well to sewer for treatment in
	aeration basin. Clean condensate returned to boiler feed water.
	· Ab
	·
NOT	E: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.
	SECTION V: SUPPLEMENTAL REQUIREMENTS
Ple	ase provide the following supplements where required for this application.
1.	Total process input rate and product weight show derivation [Rule 17-2.100(127)]
2.	See Section III A To a construction application, attach basis of emission estimate (e.g., design calcula-
••	tions, 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.)
5	See Attachment A With construction permit application, attach derivation of control device(s) efficien-
•	cy. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions \pm potential (1-efficiency).
6.	See Attachment A 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 sol-
	id and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7	See Attachment B
7.	borne 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.	
DER	Form 17-1.202(1) See Attachments D & E
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9.	The appropriate application fee in accordanade payable to the Department of Environm	ance with Rule 17-4.05. The check should be ental Regulation.
10.		attach a Certificate of Completion of Con- s constructed as shown in the construction
	SECTION VI: BEST AVAILA	BLE CONTROL TECHNOLOGY NA
Α.		ionary sources pursuant to 40 C.F.R. Part 60
	[] Yes [] No	
	Contaminant	Rate or Concentration
В.	Has EPA declared the best available contryes, attach copy)	ol technology for this class of sources (If
	[] Yes [] No	
	Contaminant	Rate or Concentration
c.	What emission levels do you propose as bes	t 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

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	5.	Useful Life:		6.	Operating Costs:		
	7.	Energy:		8.	Maintenance Cost:		
	9.	Emissions:					
		Contaminant			Rate or Concentration		
					·		_
							_
							_
					·	·	_
	10.	Stack Parameters				active pro-	
	a.	Height:	ft.	b.	Diameter: Pu L.	ft	
	c.	Flow Rate:	ACFM	d.	Temperature:	a F	•
	е.	Velocity:	FPS				
Ε.		cribe the control and treatment additional pages if necessary).	techn	olog	y available (As many types as	applicable	ر ڊ
	1.						
	a.	Control Device:		b.	Operating Principles:		
	c.	Efficiency: 1		d.	Capital Cost:		
	е.	Useful Life:		fi.	Operating Cost:	•	
	g.	Energy: 2		h.	Maintenance Cost:		
	i.	Availability of construction ma	teria]	ls an	d process chemicals:		
	j.	Applicability to manufacturing	proces	ses:			
	k.	Ability to construct with contract within proposed levels:	ol de	vice	, install in available space,	and opera	tε
	2.					·	
	а.	Control Device:		b.	Operating Principles:		
	c.	Efficiency: 1		d.	Capital Cost:		
•	е.	Useful Life:		f.	Operating Cost:		
	g.	Energy: 2		h.	Maintenance Cost:	•	
	i.	Availability of construction ma	terial	Is an	d process chemicals:		
l _{Ex} 2 _{En}	plai ergy	n method of determining efficien to be reported in units of elec	cy. trical	l pow	er - KWH design rate.		

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Applicability to manufacturing processes: Ability to construct with control device, install in available space; and operate within proposed levels: 3. Control Device: Operating Principles: b. Efficiency: 1 d. Capital Cost: Useful Life: Operating Cost: Energy: 2 q. Maintenance Cost: Availability of construction materials and process chemicals: وعقاء Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: 4. Control Device: Operating Principles: Efficiency: 1 d. Capital Costs: Useful Life: Operating Cost: g. Energy:² h. Maintenance Cost: Availability of construction materials and process chemicals: Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: Describe the control technology selected: 1. Control Device: 2. Efficiency: 1 3. Capital Cost: Useful Life: 5. Operating Cost: Energy: 2 7. Maintenance Cost: Manufacturer: 9. Other locations where employed on similar processes: a. (1) Company: (2) Mailing Address: (3) City: (4) State: ¹Explain method of determining efficiency. 2 Energy to be reported in units of electrical power - KWH design rate. DER Form 17-1.202(1)

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	(5) Environmental Manager:					
	(6) Telephone No.:					
	(7) Emissions: 1				•	
	Contaminant		~	Rate or Concent	tration	
	· ·					
	·					
	(8) Process Rate:					
	b. (1) Company:				ستشر. م	
	(2) Mailing Address:					
	(3) City:		(4) State:			
	(5) Environmental Manager:					
	(6) Telephone No.:					
	(7), Emissions: 1					
	Contaminant	•,		Rate or Concent	tration	
				•	-:	
			·.			
	(8) Process Rate: 1					
	(0)					
,	10. Reason for selection and	description	of systems:			
		ormation whe	en available.	Should this	information no) t
	lO. Reason for selection and plicant must provide this infailable, applicant must state	ormation whe	en available. s) why.	Should this T DETERIORATION	information no) t
av	10. Reason for selection and plicant must provide this infailable, applicant must state	ormation whe	en available. s) why.	•) t
	10. Reason for selection and plicant must provide this inf ailable, applicant must state SECTION VII -	ormation whe	en available. S) why. OF SIGNIFICANT	DETERIORATION	NA	
av	10. Reason for selection and plicant must provide this infailable, applicant must state SECTION VII - Company Monitored Data 1	ormation whe the reason(s PREVENTION O	en available. s) why. OF SIGNIFICANT	DETERIORATION SO ² *	NA Wind spd/di	
av	10. Reason for selection and plicant must provide this infailable, applicant must state SECTION VII - Company Monitored Data 1no. sites Period of Monitoring	PREVENTION OF TSP	en available. S) why. OF SIGNIFICANT () day year	SO ² * month day	NA Wind spd/di	
av	10. Reason for selection and plicant must provide this infailable, applicant must state SECTION VII - Company Monitored Data 1	ormation whethe reason(s PREVENTION O ISP month	en available. S) why. OF SIGNIFICANT () / to	SO ² * month day	NA Wind spd/di	
av	10. Reason for selection and plicant must provide this infailable, applicant must state SECTION VII - Company Monitored Data 1no. sites Period of Monitoring	ormation whethe reason(s PREVENTION O ISP month	en available. S) why. OF SIGNIFICANT () / to	SO ² * month day	NA Wind spd/di	
av.	10. Reason for selection and plicant must provide this infailable, applicant must state SECTION VII - Company Monitored Data 1	ormation whethe reason(s PREVENTION C ISP month c	en available. S) why. OF SIGNIFICANT () / to	SO ² * month day	NA Wind spd/di	

	2.	Înstrumentation,	, Field an	d Laborato	гу					
	a.	Was instrumentat	tion EPA r	eferenced	or its e	quivalent?	[] Ye	s [] N	o	
	b.	Was instrumental	tion calib	rated in a	ccordanc	e with Dep	artment	procedur	es?	
		[] Yes [] No	[,] Unko	o wn						
В.	Met	eorological Data	Used for	Air Qualit	y Modeli	n g				
	1.	Year(s) o	f data fro	m / / month d	/ ay year	to	///day/ye	ar.		
	2.	Surface data obt	tained fro	m (locatio	n)					· · ·
	3.	Upper air (mixim	ng height)	data obta	ined fro	m (locatio	n)			
	4.	Stability wind i	rose (STAR) data obt	ained fr	om (locati	on)			
c.	Com	puter Models User							**	•
	1.					Modified?	If yes	, attach	descript	ion.
	2.					Modified?	If yes	, attach	descript	ion.
	3.					Modified?	If yes	, attach	descript	ion.
	4.					Modified?	If yes	, attach	descript	ion.
		ach copies of all	l final mo							
D.	Арр	olicants Maximum A	Allowable	Emission D	ata		٠.	•		
	Pol	lutant		Emission R	ate					
		TSP	·.			gr	ams/sec			
		502				gr	ams/sec			
Ε.	Emi	ssion Data Used i	in Modelin	g						
	poi	ach list of emiss at source (on NEI I normal operating	DS point r							

- F. Attach all other information supportive to the PSD review.
- Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). assessment of the environmental impact of the sources.
- H. Attach scientific, engineering, and technical material, reports, publications, jour-nals, 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

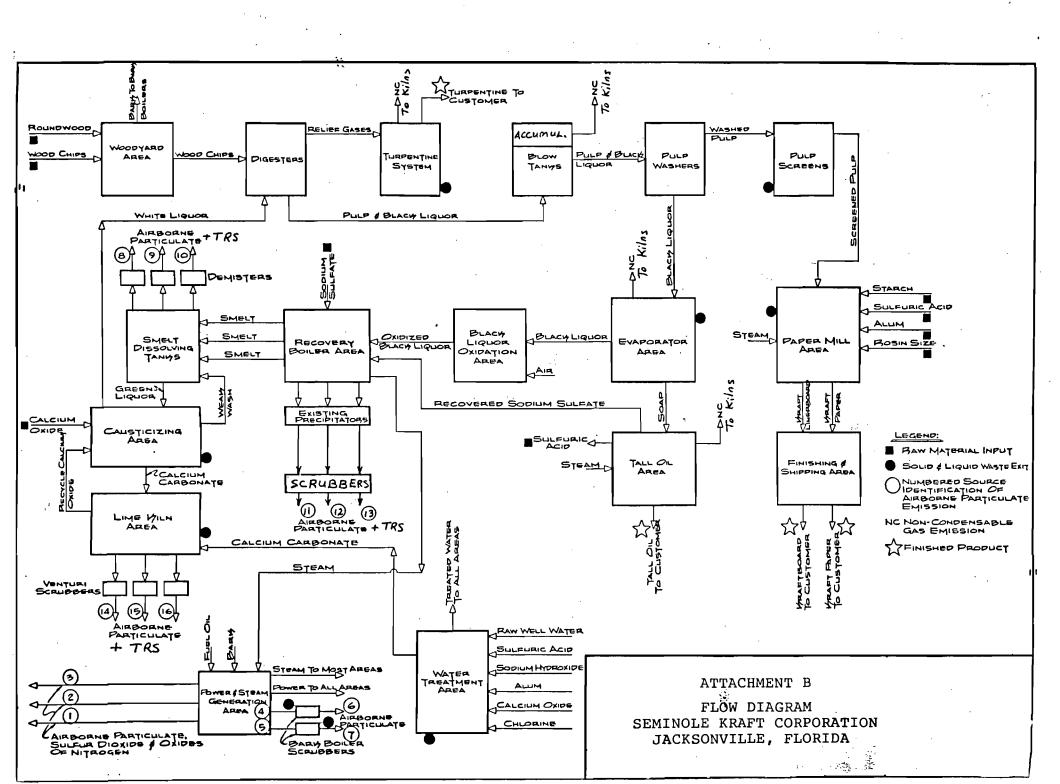
TRS emissions from multiple-effect evaporators are emitted from the condensate hotwells. The hotwell on No.1 Line multiple-effect evaporator was previously open to the atmosphere with no control of TRS.

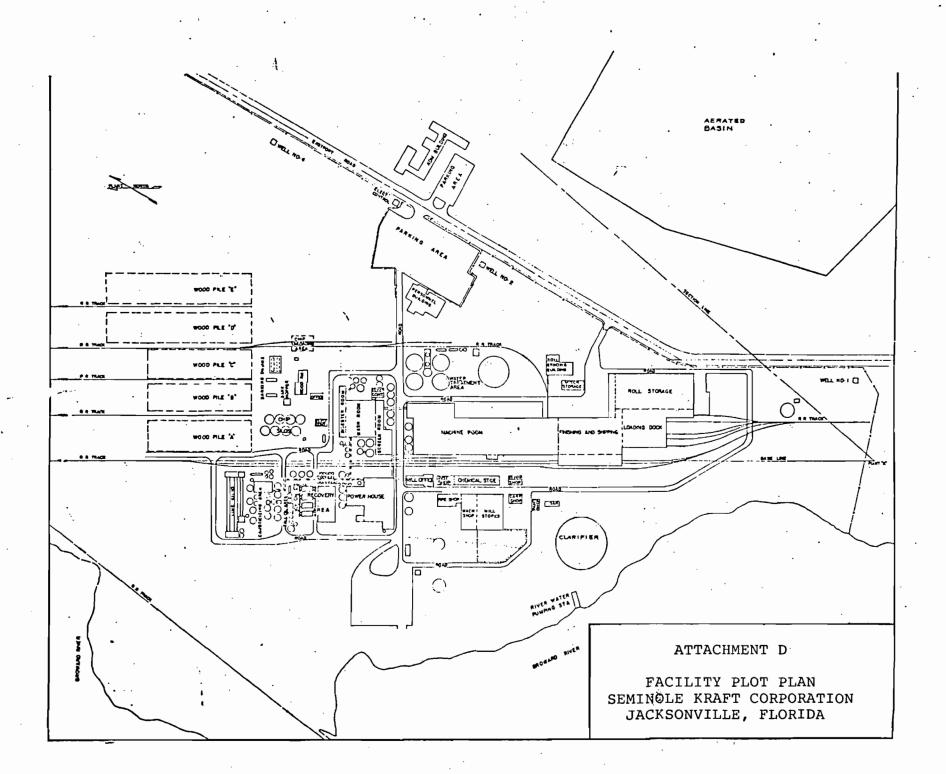
This construction permit will cover the installation of a stain-less steel sheet metal cover on the hotwell with a stack connected to the existing non-condensible gas collection (NCG) system. The cover and stack were installed first in order to analyze the TRS emissions. This was necessary to determine 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.

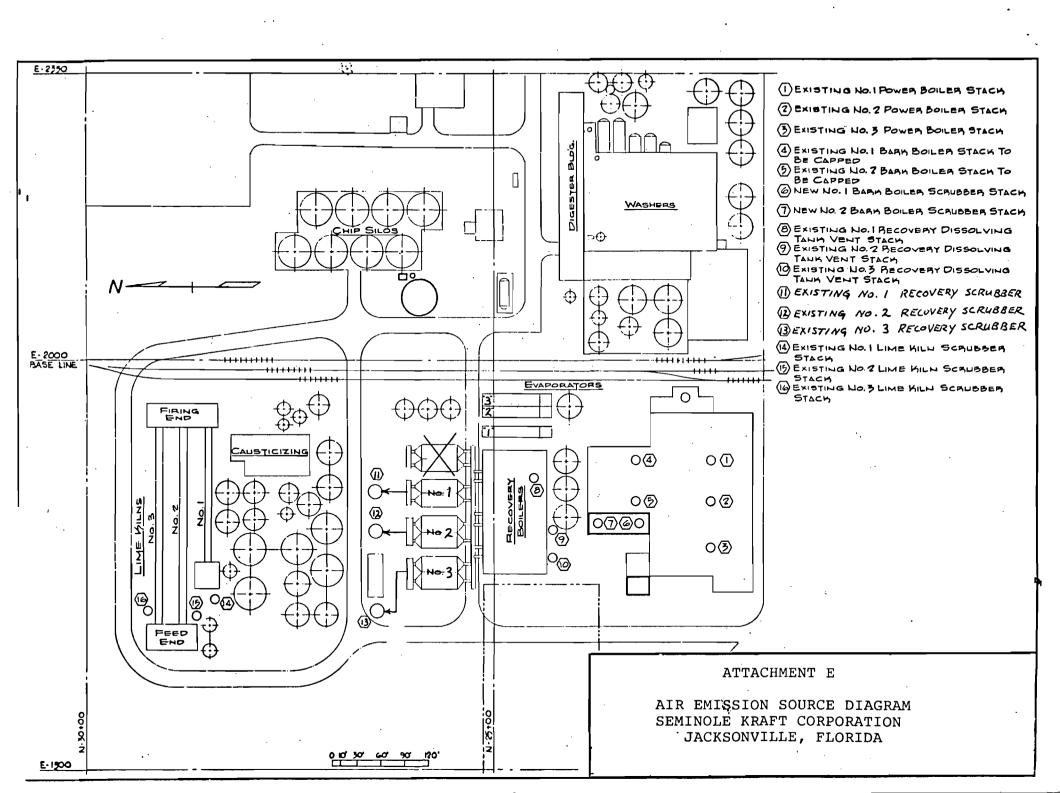
The trial demonstrated that the TRS gasses from all three lines of multiple-effect evaporators may safely be collected in the existing NCG system and incinerated in the lime kilns. Therefore, this construction permit application is to cover the existing installation which is currently in operation.

The use of lime kilns to achieve complete destruction of TRS compounds is a recognized technology that is well documented. 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.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.







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:

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

Bv:

Vice President

BEST AVAILABLE COPY

STATE OF FLORIDA

Pd \$1000.00 Rucipt #76193 V#9394 AC16-141800

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

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



DER

BOB GRAHAM GOVERNOR

NOV 12 1987

VICTORIA J. TSCHINKEL SECRETARY ERNESTE FREY

TEATION TYPE	APPLICATION TO		UCT AIR PO	DLLUTION	COMPCEC	
TEATION TYPE	· · · · · · · · · · · · · · · · · · ·				SOURCES	•
TON TYPE			[] New ¹	[x] Exis	ting ^l	•
	: [X] Constructi	on []Operat	ion [] :	Modificat	ion	
ANY NAME: Sei	ninole Kraft Corp	oration	·		COUNTY:_	Duval
						- نت نر،
No. 4 with	Tenturi Scrubber;	Peaking Unit	No. 2, Gas	s Fired)	#2 Line M	ulti-Effect
CE LOCATION:	Street 9469	Eastport Road			City_Ja	Evaporato cksonville
	UTM: East	7441.75		North_	3365.60	
•	Latitude 30 •	25 · 15 ''N		Longi tu	de <u>81</u> °	<u>36 ' .00 ''</u> W
ICANT NAME AN					•	
ICANT ADDRES:	P. O. Box	26998, Jackso	nville, Fl	orida 32	2218	
I am the under I certify the permit are to a gree to a facilities in the statutes, and also understand I will prestablishments.	ersigned owner or at the statements fue, correct and maintain and open such a manner all the rules and that a permiteromptly notify the	authorized remade in this complete to the rate the poll as to comply and regulations, if granted e department uses.	application con with the of the despon sale T. Frank	ive* of Secon for a my knowl trol sour provision epartment, or legal Lee, Generative (constructedge and ree and reviwill be transfer eral Mana Please Ty	tion belief. Further pollution contro pter 403, Florio sions thereof. non-transferab of the permitte
PROFESSIONAL	ENGINEER REGISTE				_	
	No. 4 with WE CE LOCATION: ICANT NAME AND ICANT ADDRESS APPLICANT I am the under the service of a facilities in statutes, and also understand I will prestablishment ach letter of	No. 4 with Venturi Scrubber; CE LOCATION: Street9469 UTM: East	No. 4 with Venturi Scrubber; Peaking Unit CE LOCATION: Street 9469 Eastport Road UTM: East 7441.75 Latitude 30 ° 25 ' 15 ''N ICANT NAME AND TITLE: T. Frank Lee, Gen ICANT ADDRESS: P. 0. Box 26998, Jackso SECTION I: STATEMENTS BY APPLICANT I am the undersigned owner or authorized relations are true, correct and complete to the lagree to maintain and operate the poll facilities in such a manner as to comply Statutes, and all the rules and regulations also understand that a permit, if granted and I will promptly notify the department destablishment. ach letter of authorization Sign	No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gast CE LOCATION: Street 9469 Eastport Road UTM: East 7441.75 Latitude 30 • 25 • 15 • "N ICANT NAME AND TITLE: T. Frank Lee, General Manage ICANT ADDRESS: P. 0. Box 26998, Jacksonville, FI SECTION I: STATEMENTS BY APPLICANT APPLICANT I am the undersigned owner or authorized representat I certify that the statements made in this application permit are true, correct and complete to the best of I agree to maintain and operate the pollution confacilities in such a manner as to comply with the Statutes, and all the rules and regulations of the dealso understand that a permit, if granted by the deand I will promptly notify the department upon sale establishment. ach letter of authorization T. Frank Name and Date: 11/11/8	No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) CE LOCATION: Street9469 Eastport Road UTM: East7441.75	Latitude 30 • 25 • 15 • 10 Longitude 81 • ICANT NAME AND TITLE: T. Frank Lee, General Manager ICANT ADDRESS: P. O. Box 26998, Jacksonville, Florida 32218 SECTION I: STATEMENTS BY APPLICANT AND ENGINEER APPLICANT I am the undersigned owner or authorized representative* of Seminole K. I certify that the statements made in this application for a construct permit are true, correct and complete to the best of my knowledge and I agree to maintain and operate the pollution control source and facilities in such a manner as to comply with the provision of Cha Statutes, and all the rules and regulations of the department and revialso understand that a permit, if granted by the department, will be and I will promptly notify the department upon sale or legal transfer establishment.

This is to certify that the engineering features of this pollution control project hav been designed/examined by me and found to be in conformity with modern engineerin principles applicable to the treatment and disposal of pollutants characterized in th permit application. There is reasonable assurance, in my professional judgment, tha

DER Form 17-1.202(1) Effective October 31, 1982

 $^{^{}m l}$ See Florida Administrative Code Rule 17-2.100(57) and (104)

	an effluent that complies with rules and regulations of the d	all appli epartment.	properly maintained and operated, will discharge icable statutes of the State of Florida and the . It is also agreed that the undersigned will
	furnish, if authorized by the maintenance and operation of t pollution sources.	owner, the he polluti	e applicant a set of instructions for the proper ion control facilities and, if applicable,
	MOAS	Signed_	John T. M. Vinnon P.E. 1931/3 1/2
		_	John T. McKinnon, P.E.
			Name (Please Type) 30. 373)7 Stone Container Corporation 31473 07
		Suite 40	Company Name (Please Type) O, 2150 Parklake Drive, Atlanta, GA 30345
			Mailing Address (Please Type)
Flo	rida Registration No. 37697	_ Date:	11/11/87 Telephone No. 404/621-6709
	SECTION I	I: GENERA	AL PROJECT INFORMATION
Α.	and expected improvements in s	ource perf	roject. Refer to pollution control equipment, formance as a result of installation. State compliance. Attach additional sheet if
		Atta	achment A
В.	Start of Construction comple		lication (Construction Permit Application Only) Completion of Construction complete
€.	Costs of pollution control sys for individual components/unit	s of the p	Note: Show breakdown of estimated costs only project serving pollution control purposes.
	Hot well covers and	vent stack	tie-in = \$30,000
	(cost covers a	all three	lines)
	·		,
D.	Indicate any previous DER perm point, including permit issuan		s and notices associated with the emission iration dates.
	Draft Interim O _I	erating P	ermit = A016-116142
	Form 17-1.202(1) ective October 31, 1982	Page	2 of 12

	this is a new source or major modification, answer the following questies or No)	ons. NA
1.	Is this source in a non-attainment area for a particular pollutant?	
	a. If yes, has "offset" been applied?	, 2, 5 m.
	b. If yes, has "Lowest Achievable Emission Rate" been applied?	<u>-</u>
	c. If yes, list non-attainment pollutants.	· · · · · · · · · · · · · · · · · · ·
2.	Does best available control technology (BACI) 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?	
	"Reasonably Available Control Technology" (RACT) requirements apply this source?	NA
	a. If yes, for what pollutants?	

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:

Contaminants		Utilization	·
Туре	% W t	Rate - lbs/hr	Relate to Flow Diagram
NA	NA	450.000	19
-			·
	Туре		Type % Wt Rate - lbs/hr

В.	Process	Rate.	i f	applicable:	(See	Section	٧.	Item	1)
•		,		appricate.	(3 0 0	00000	٠,	10011	_ ,

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	Allowable ³ Emissionlbs/hr	Potenti Emissi lbs/yr		Relate to Flow Diagram
	lbs/hr ĭ/yr	17-2	.150/111	100//1		
TRS	NA - Incinerated	in lime kilr	s	1,671,737	836	19
				,		
				·.		
			,			

¹See Section V, Item 2.

 $^{4\dot{E}}$ mission, if source operated without control (See Section V, Item 3).

EPA
$$450/2-78-003b$$
727 Ton Pulp x 6.3 lbs. TRS x 365 days = 1,671,737 lbs. TRS = 836 Tons
Ton Pulp Year Year

 $^{^2}$ 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)

³Calculated from operating rate and applicable standard.

D	Control	Devices:	(See	Section	V	Item A	4)
1/ .	COULTERI	DEATCES!	() = =	JEC (1011	٧.	1166111 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
·				
<i>'</i>				

E. Fuels NA

	Consump				
Type (Be Specific)	avg/hr	max./hr	Maximum Heat Input (MMBIU/hr)		
•					
					
· · · · · · · · · · · · · · · · · · ·					
		·			

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

Percent Sulfur:		Percent Ash:	<u></u>
Density:	lbs/gal	Typical Percent Nitrogen:	
Heat Capacity:	BTU/1b		BTU/gal
Other Fuel Contaminants (which may	cause air p	ollution):	
F. If applicable, indicate the pe			
Annual Average	Ma	ximum	<u>-</u>
Annual Average G. Indicate liquid or solid waste	Ma s generated	and method of disposal.	
Annual Average G. Indicate liquid or solid waste	Ma s generated	ximum	
Annual Average G. Indicate liquid or solid waste	Ma s generated oiler feed w	ximumand method of disposal. ater. Contaminated condensate from	

	See L			tt.	Stack Di	amete:	r:		г
as Flow Rate:		ACFM		_DSCFM	Gas Exit	Temp	erature:		0
later Vapor Co									
							NA NG		4,
Type of T Waste (Pl	/pe O astics)	Type I (Rubbish)	Type II (Refuse)	Type (Garba		IV olog- al)	Type V (Liq.& Ga By-prod.	Type V s (Solid By-	I prod.
Actual lb/hr Inciner- ated	·.								
Uncon- trolled (lbs/hr)									
opproximate Nu	ber of	Hours of	Operation	per da	V	day/v	vk	wke/vr	
anufacturer					٠,				
					·				
				Mod	·	Fuel			
ate Construct	ed	Volume	Heat R	Mod	el No	Fuel		Temperatu	
ate Construct	ed	Volume	Heat R	Mod	el No	Fuel		Temperatu	
ate Constructo Primary Chambo	er nber	Volume (ft) ³	Heat R (BTU	Mod elease /hr)	el No	Fuel	BIU/hr	Temperatu (°F)	re
Primary Chambo	er nber	Volume (ft) ³	Heat R (BTU	Mod elease /hr)	el No	Fuel	BTU/hr Stack	Temperatu (°F)	re
Primary Chambo Secondary Char itack Height: ias Flow Rate:	er nber	Volume (ft) ³ ft.	Heat R (BTU Stack Dia _ACFM	elease/hr) mter:	Type DS:	Fuel	BIU/hr Stack	Temperatu (°F)	re F
Primary Chambo Secondary Char tack Height: as flow Rate:	tons p	Volume (ft) ³ ft. er day des	Heat R (BTU Stack Dia _ACFM _ign capac ed to 50%	elease /hr) mter: ity, su	Type DSobmit the	Fuel CFM*	BIU/hr Stack Velocity:	Temperatu (°F) Temp. in grains pe	re F

Bri	ef description of operating characteristics of control devices:
	See Attachment A
	imate disposal of any effluent other than that emitted from the stack (scrubber water, etc.):
	Contaminated condensate from hot well to sewer for treatment in aeration basin.
	Clean condensate returned to boiler feedwater.
NOTE	I: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.
	SECTION V: SUPPLEMENTAL REQUIREMENTS
Plea	ase provide the following supplements where required for this application.
1.	Total process input rate and product weight A 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
	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 $1/2" \times 11"$ 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.

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9.	made payable to the Department of Envi	cordance with Rule 17-4.05. The check should be ronmental Regulation.
10.		mit, attach a Certificate of Completion of Conwas constructed as shown in the construction
		•
	SECTION VI: BEST AV	AILABLE CONTROL TECHNOLOGY NA
Α.	Are standards of performance for new sapplicable to the source?	stationary sources pursuant to 40 C.F.R. Part 60
	[] Yes [] No	
	Contaminant	Rate or Concentration
В.	Has EPA declared the best available c	ontrol technology for this class of sources (If
	[] Yes [] No	
	Contaminant	Rate or Concentration
с.	What emission levels do you propose as	best available control technology?
	Contaminant	Rate or Concentration
D.	Describe the existing control and trea	tment technology (if any).
	1. Control Device/System:	2. Operating Principles:
	3. Efficiency:*	4. Capital Costs:
* E x	plain method of determining	
	Form 17-1.202(1) ective November 30, 1982 Pag	ge 8 of 12

5.	Useful Life:		6.	Operating Costs:	
7.	Energy:		8.	Maintenance Cost:	
9.	Emissions:				
	Contaminant			Rate or Concentration	•
	· · · · · · · · · · · · · · · · · · ·			\$ <u></u>	
					
	· · · · · · · · · · · · · · · · · · ·				
					·
10.	Stack Parameters				wijida.
а.	Height:	ft.	b.	Diameter:	ft.
• с.	Flow Rate:	ACFM	d.	Temperature:	°F.
е.	Velocity:	FPS			
	cribe the control and treatment additional pages if necessary).	techn	olog	y available (As many types as	applicable,
1.	•	٠.			
а.	Control Device:		ь.	Operating Principles:	
с.	Efficiency: 1		đ.	Capital Cost:	
е.	Useful Life:		f.	Operating Cost:	
g.	Energy: ²		h.	Maintenance Cost:	
i.	Availability of construction ma	terial	s an	d process chemicals:	
j.	Applicability to manufacturing	proces	ses:		
k.	Ability to construct with contract within proposed levels:	rol de	vice	, install in available space,	and operate
2.					-
а.	Control Device:		b.	Operating Principles:	
с.	Efficiency: 1		d.	Capital Cost:	
е.	Useful Life:		f.	Operating Cost:	
g .	Energy: ²		h.	Maintenance Cost:	
i.	Availability of construction ma	terial	s an	d process chemicals:	
^l Explain ² Energy	n method of determining efficien to be reported in units of elec	cy. trical	pow	er - KWH design rate.	

Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: 3. Control Device: Operating Principles: Efficiency: 1 c. Capital Cost: Useful Life: Operating Cost: Energy: 2 q. Maintenance Cost: Availability of construction materials and process chemicals: Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: Control Device: b. Operating Principles: Efficiency: 1 Capital Costs: d. Useful Life: Operating Cost: f. Energy: 2 Maintenance Cost: Availability of construction materials and process chemicals: Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: Describe the control technology selected: 1. Control Device: 2. Efficiency: 1 3. Capital Cost: Useful Life: 5. Operating Cost: Eneray: 2 7. Maintenance Cost: Manufacturer: Other locations where employed on similar processes: a. (1) Company: (2) Mailing Address: (3) City: (4) State: ¹Explain method of determining efficiency. ²Energy to be reported in units of electrical power - KWH design rate.

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Effective November 30, 1982

		,					
	(5) Environmental Manager:						
	(6) Telephone No.:						
	(7) Emissions: 1						
	Contaminant		~	Rate o	r Concentr	ation	
	:				·		
	(8) Process Rate: 1			-			
	b. (1) Company:						· · sign
	(2) Mailing Address:						
	(3) City:		(4) State	:			
	(5) Environmental Manager:						
	(6) Telephone No.:						
	(7) Emissions: 1						,
	Contaminant	٠.		Rate o	r Concentr	ation	
							*
	·						
	(8) Process Rate: 1						
	10. Reason for selection and descri	iption	of systems	:			
	licant must provide this informatio ilable, applicant must state the rea			. Shoul	ld this in	oformatio	n not b
	SECTION VII - PREVENT	TION OF	SIGNIFICA	NT DETER	IORATION	·NA	
Α.	Company Monitored Data						
	lno. sites	TSP)_ so ² * _		_ Wind sp	nib\b
ı	Period of Monitoring month	/ da	y year	to	/ / day ye	ar	
ı	Other data recorded						· · · · · · · · · · · · · · · · · · ·
	Attach all data or statistical summa	aries t	o this app	lication.			
Spe	cify bubbler (B) or continuous (C).						
	Form 17-1.202(1) ctive November 30, 1982	Page 1	1 of 12				

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· .

	2.	Instrumentati	on, Field and	Laboratory					
	а.	Was instrumen	tation EPA re	ferenced or its	equivalent?	[] Yes	[] No		
	ь.	Was instrumen	tation calibra	ated in accorda	nce with Dep	artment p	rocedure	s?	
		[] Yes []	No [] Unkno	₩n					
В.	Met	eorological Da	ita Used for A.	ir Quality Mode	ling				
	1.	Year(s)	of data from	month day ye	to	/ / day yea	r .		
	2.	Surface data	obtained from	(location)					
	3.	Upper air (mi	xing height) (data obtained f	rom (locatio	n)			
	4.	Stability win	d rose (STAR)	data obtained	from (locati	on)			
c.	Com	puter Models U	sed						
	l.	· 			Modified?	If yes,	attach	descript	ion.
	2.				Modified?	If yes,	attach	descript	ion.
	3.								
	4.								
		ach copies of le output tabl		el runs showing	input data,	receptor	locatio	ins, and p	prin-
D.	Арр	licants Maximu	m Allowable En	nission Data					
	Pol	lutant	Еп	ission Rate					
		TSP	·		gr.	ams/sec			
		so ²							
ε.	Emi	ssion Data Use	d in Modeling						
				s. Emission da					

and normal operating time.

- Attach all other information supportive to the PSD review.
- Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). assessment of the environmental impact of the sources.
- 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

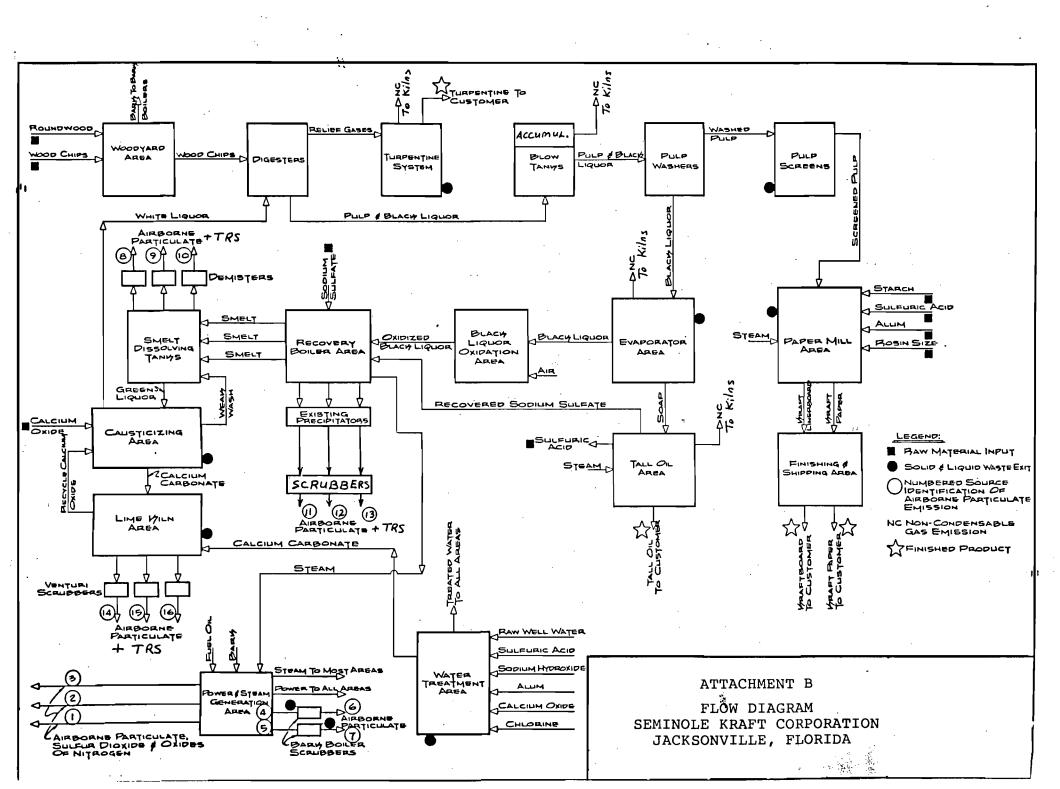
TRS emissions from multiple-effect evaporators are emitted from the condensate hotwells. The hotwell on No.2 Line multiple-effect evaporator was previously open to the atmosphere with no control of TRS.

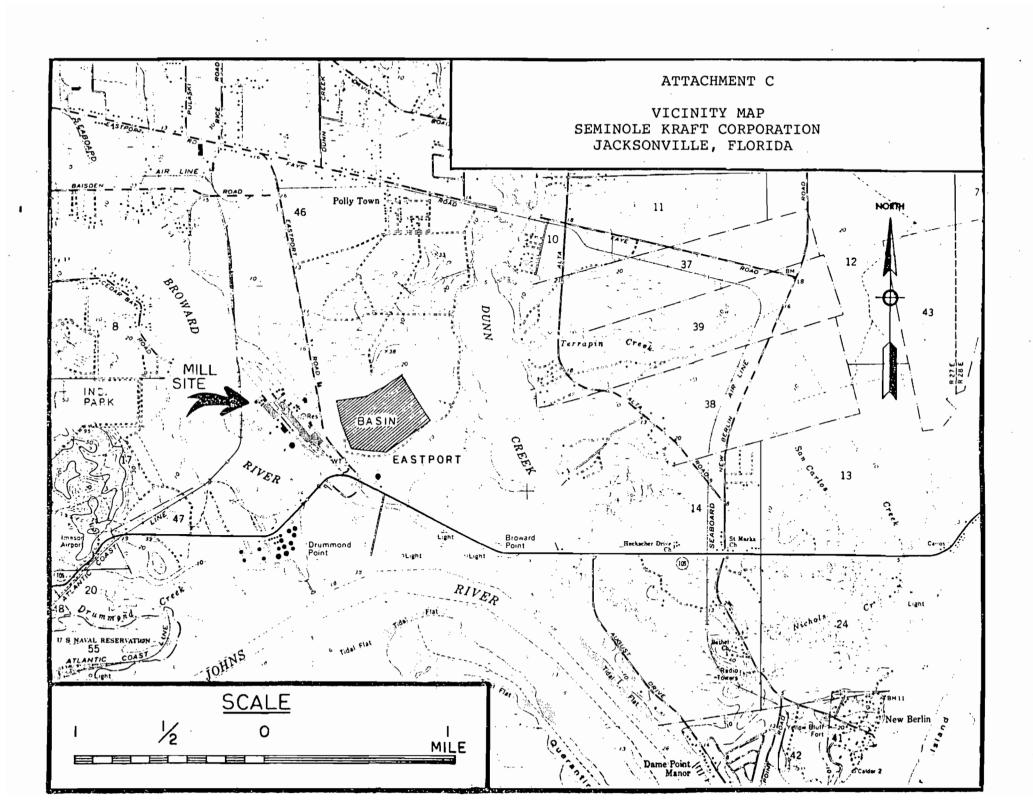
This construction permit will cover the installation of a stain-less steel sheet metal cover on the hotwell with a stack connected to the existing non-condensible gas collection (NCG) system. The cover and stack were installed first in order to analyze the TRS emissions. This was necessary to determine 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.

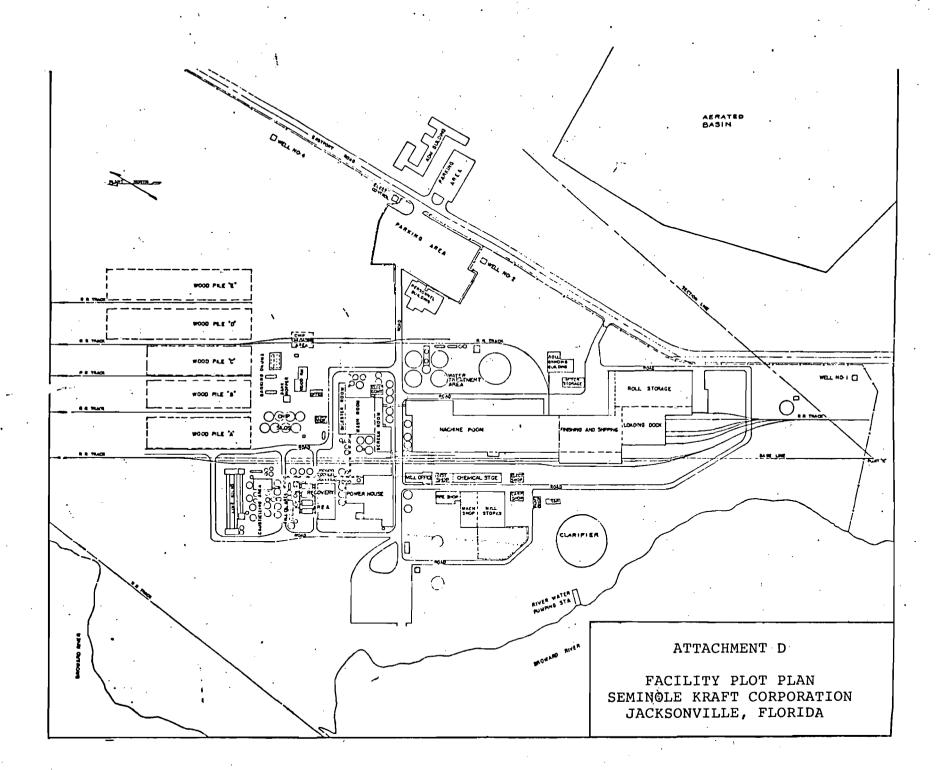
The trial demonstrated that the TRS gasses from all three lines of multiple-effect evaporators may safely be collected in the existing NCG system and incinerated in the lime kilns. Therefore, this construction permit application is to cover the existing installation which is currently in operation.

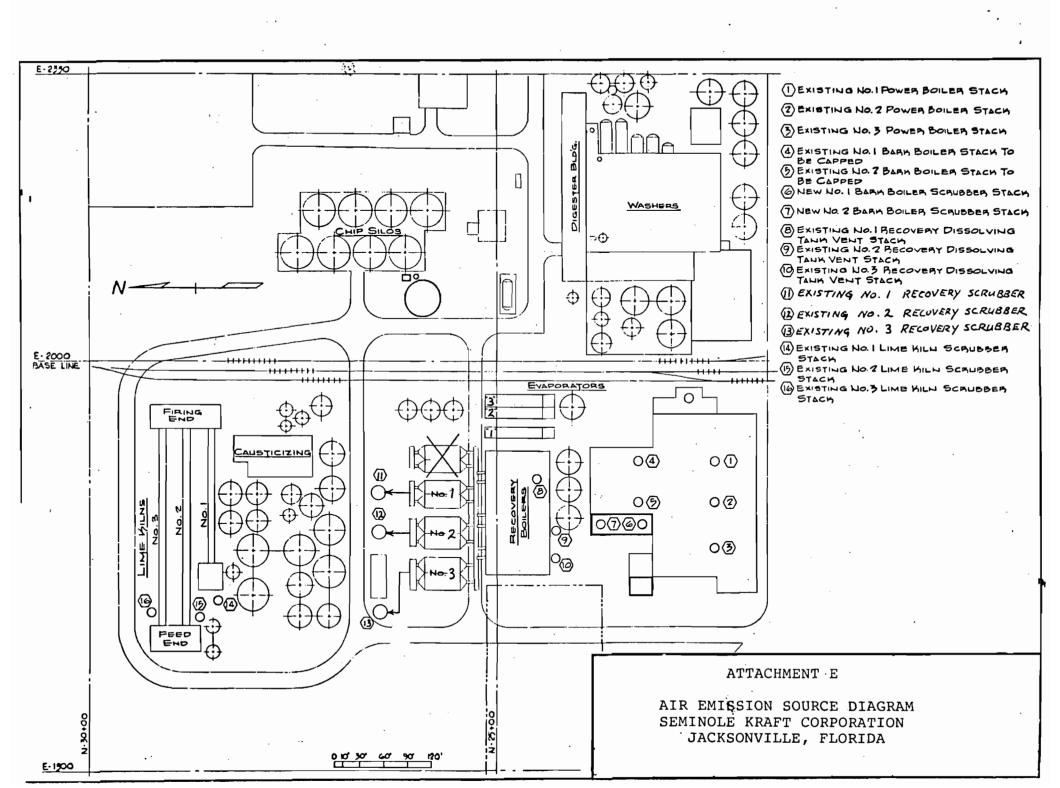
The use of lime kilns to achieve complete destruction of TRS compounds is a recognized technology that is well documented. stated in EPA 450/3-83-017, "Review of New Source Performance Standards for Kraft Pulp Mills", incineration in lime kilns adequately achieves the 1200°F and 0.5 second retention 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.









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:

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

Bv:

Vice President

BEST AVAILABLE COPY

STATE OF FLORIDA

Pd. \$1000.00 Ruceipt# 76193 V # 9395 AC 16-141801

DEPARTMENT OF ENVIRONMENTAL REGULATION

BOB GRAHAM GOVERNOR

NOV 12 1987

VICTORIA J. TSCHINKEL **SECRETARY**

ERNEST E FREY DISTRICT MANAGER

OF ENVIRONMENTAL

STATE OF FLOR

NORTHEAST DIST
3426 BILLS ROAD JACKSONVILLE, FLORIDA (904) 396-6959
Authorities Control of the Control o
SOURCE TYPE:

NORTHEAST DISTRICT

3426 BILLS ROAD JACKSONVILLE, FLORIDA 32207

1813. 31331	APPLICATION TO OPERATE/CONSTRUCT	AIR POLLUTION SOURCES
SOURCE TYPE:	Air Pollution []	New ^l [X] Existing ^l
ARPLICATION TYPE	E: [X] Construction [] Operation	[] Modification
COMPANY NAME:	Seminole Kraft Corporation	COUNTY: Duval
Identify the spe	ecific emission point source(s) addr	essed in this application (i.e. Lime
Kiln No. 4 with SOURCE LOCATION:	Venturi Scrubber; Peaking Unit No. Street 9469 Eastport Road	2, Gas Fired) #3 Line Multi-Effect City Jacksonville
	UTM: East 7441.75	North 3365.60
	Latitude <u>30 ° 25 ' 15 "</u> N	Longitude 81 ° 36' 00 "W
APPLICANT NAME A	ND TITLE: T. Frank Lee, General I	Manager
APPLICANT ADDRES	P. O. Box 26998, Jackson	onville, Florida 32218
	SECTION I: STATEMENTS BY APPL	ICANT AND ENGINEER
A APPLICANT		

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

construction I certify that the statements made in this application for a 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:		$2\rightarrow$	te, 4_		
T. Frank	Lee,	6eneral	Manager	•	
Name	and	Title (F	Please T	ype)	

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

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 There is reasonable assurance, in my professional judgment, that permit application.

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

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Page 1 of 12

	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,
	Signed John T. M. Vinna P. E. Williams
	Name (Please Type)
	Stone Container Corporation Company Name (Please Type)
	Suite 400, 2150 Parklake Drive, Atlanta, GA 35345
Flo	rida Registration No. 37697 Date: 11/11/87 Telephone No. 404/621-6709
	SECTION II: GENERAL PROJECT INFORMATION
Α.	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
В.	Schedule of project covered in this application (Construction Permit Application Only)
	Start of Construction <u>Complete</u> Completion of Construction <u>Complete</u>
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)
	· · · · · · · · · · · · · · · · · · ·
Ο.	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
	Form 17-1.202(1) ective October 31, 1982 Page 2 of 12

=

No the North Control of the Control	· · · · · · · · · · · · · · · · · · ·
f this is a new source or m Yes or No)	najor modification, answer the following questions.
. 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-att	ainment pollutants.
 Does best available cont If yes, see Section VI. 	rol technology (BACT) apply to this source?
	ion of Significant Deterioriation" (PSD) is source? If yes, see Sections VI and VII.
Do "Standards of Perform apply to this source?	nance for New Stationary Sources" (NSPS)
 Do "National Emission St (NESHAP) apply to this s 	tandards for Hazardous Air Pollutants"
o "Reasonably Available Con to this source?	ntrol Technology" (RACT) requirements apply
a. If yes, for what pol	llutants?

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

	Conta	minants	Utilization	
Description	Туре	% Wt	Rate - lbs/hr	Relate to Flow Diagram
15% Black Liquor	NA_	NA	450,000	20
	•			
		- 		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,

А	Process	Rate	i f	applicable:	(See	Section V		Item	1)
u •	FIUCESS	nate,	Ι,	appricable.	(366	Jection V	•	1 6 6 111	. ,

1.	Total	Process	Input	Rate	(lbs/hr):	450,000	1bs/hr	9	15%	solids	
----	-------	---------	-------	------	-----------	---------	--------	---	-----	--------	--

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of	Emission ^l	Allowed ² Emission Rate per	Allowable ³ Emission	Potenti Emissi		Relate to Flow
Contaminant	Maximum Actual lbs/hr T/yr	Rule 17-2	lbs/hr	lbs/yr	T/yr	Diagram ———
TRS	NA - Incinerated	in lime kiln		1,671,737	836	20
	·					

¹See Section V, Item 2.

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

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²Reference 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)

³Calculated from operating rate and applicable standard.

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

n	Control	Devices:	(500	Saction	1/	Itaa	۸, ۱	١
υ.	COULTOI	nevices:	(.) 6 6	2600100	٧.	ılen	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	<u>∼100%</u>	NA	See Attachment
L IIIC KTTIS		· ·		
		;		

E. Fuels NA

	Consump	tion*	
Type (Be Specific)	avg/hr	max./hr	Maximum Heat Input (MMBTU/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/1b		_ BTU/gal
Other Fuel Contaminants (which may	cause air p	ollution):	
F. If applicable, indicate the pe	rcent of fue	l used for space heating. NA	
Annual Average			
G. Indicate liquid or solid waste Clean condensate to boiler feedwa		and method of disposal. minated condensate from hot wells to	
sewer for treatment in aeration b	asin.		

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					tics (Provide	•	ach stack):ft.
							°F.
water vapor	content:				Velocity:		·FPS
		SECT	ION IV:	INCINERA	TOR INFORMATI	ON NA 1.	
Type of Waste (Type 0 Plastics)				II Type IV e) (Patholog- ical)	Type V (Liq.& Gas By-prod.)	Type VI (Solid By-prod.) حد
Actual lb/hr Inciner- ated							
Uncon- trolled (lbs/hr)							
Total Weight	Incinera	ted (lbs/h	r) Operation	per day	day/	acity (lbs/	hr)wks/yr
Date Constru	cted			Model	l No		
		Volume (ft) ³	Heat R (BIU	elease /hr)	Fuel Type	BTU/hr	Temperature (°F)
Primary Cha	mber						
Secondary C	hamber						
Stack Height	:	ft. 9	Stack Dia	mter:		Stack T	emp
Gas Flow Rat	e:		_ACFM		DSCFM*	Velocity: _	FP\$
*If 50 or mo dard cubic f						ions rate i	n grains per stan-
Type of poll	ution con	trol devic		•	[] Wet Scrub		
DER Form 17-	1.202(1)		[]0	ther (spe	ecify)		

Effective November 30, 1982

Ari	ef description of operating characteristics of control devices:
011	See Attachment A
	imate disposal of any effluent other than that emitted from the stack (scrubber water, , etc.):
	Contaminated condensate from hot well to sewer for treatment in aeration basin.
	Clean condensate returned to boiler feedwater.
	75
NOT	E: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable. SECTION V: SUPPLEMENTAL REQUIREMENTS
Ple	ase provide the following supplements where required for this application.
l.	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) efficien- cy. Include test or design data. Items 2. 3 and 5 should be consistent: actual emis-

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 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 B 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.

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Page 7 of 12

- 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 AV	AILABLE CONTROL TECHNOLOGY NA								
Α.	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								
		·								
В.	Has EPA declared the best available cyes, attach copy)	ontrol technology for this class of sources (If								
	[] Yes [] No									
	Contaminant	Rate or Concentration								
	· · · · · · · · · · · · · · · · · · ·									
	What emission levels do you propose as	best available control technology?								
	Contaminant	Rate or Concentration								
	· · · · · · · · · · · · · · · · · · ·									
D.	Describe the existing control and treat	tment technology (if any).								
	1. Control Device/System:	2. Operating Principles:								
	3. Efficiency:*	4. Capital Costs:								
≉Ex	plain method of determining									
DER	Form 17-1.202(1)									
		je 8 of 12								

					•	
	5.	Useful Life:		6.	Operating Costs:	
	7.	Energy:		8.	Maintenance Cost:	
	9.	Emissions:				
		Contaminant			Rate or Concentration	
					· · · · · · · · · · · · · · · · · · ·	
		·				· · · · ·
						خدود د
	10.	Stack Parameters				
	а.	Height:	ft.	ь.	Diameter:	ft.
	c.	Flow Rate:	ACFM	d.	Temperature:	٥F.
	е.	Velocity:	FPS			
Ε.		cribe the control and treatment additional pages if necessary).	techn	alog	y available (As many types as	applicable,
	1.	•	٠.			
	a.	Control Device:		b.	Operating Principles:	
	c.	Efficiency: 1		d.	Capital Cost:	
	е.	Useful Life:		f.	Operating Cost:	•
	g.	Energy: ²		h.	Maintenance Cost:	
	i.	Availability of construction ma	terial	s an	d process chemicals:	
	j.	Applicability to manufacturing p	proces	ses:		
	k.	Ability to construct with contrainth proposed levels:	ol de	vice	, install in available space,	and operate
:	2.				t	
	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 ma	terial	s an	d process chemicals:	
l E x 2E n	plai ergy	n method of determining efficiend to be reported in units of elec	cy. trical	. pow	er - KWH design rate.	·.

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Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: 3. Control Device: Operating Principles: b. Efficiency: 1 Capital Cost: Useful Life: Operating Cost: Energy: 2 Maintenance Cost: Availability of construction materials and process chemicals: Applicability to manufacturing processes: j. Ability to construct with control device, install in available space, and operate within proposed levels: 4. Control Device: Operating Principles: Efficiency: 1 Capital Costs: с. d. Useful Life: Operating Cost: f. Energy: 2 Maintenance Cost: g. Availability of construction materials and process chemicals: Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: Describe the control technology selected: 1. Control Device: Efficiency: 1 2. 3. Capital Cost: Useful Life: 5. Operating Cost: Energy: 2 Maintenance Cost: Manufacturer: Other locations where employed on similar processes: a. (1) Company: (2) Mailing Address: (3) City: (4) State: ¹Explain method of determining efficiency. 2 Energy to be reported in units of electrical power - KWH design rate. DER Form 17-1.202(1)

Page .10 of 12

Effective November 30, 1982

Ξ

		**			
(5) Environmental Manager:	:				
(6) Telephone No.:					
(7) Emissions: 1					
Contaminant	· .	- '	Rate or	Concentration	1 · ; · ·
*					
				-	· · · · · · · · · · · · · · · · · · ·
(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	n %
,					
	· · · · · · · · · · · · · · · · · · ·	: .			
(8) Process Rate: 1					
10. Reason for selection a	and description	of systems:			
Applicant must provide this i available, applicant must stat SECTION VII) why.	:	this inform	
A. Company Monitored Data					
lno. sites	TSP	()	_ 50 ² *	Wir	nd spd/dir
Period of Monitoring	month de	/ tear	o	/ / day year	
Other data recorded					·
Attach all data or statisti	ical summaries (to this appl	ication.		
*Specify bubbler (B) or continu	iona (C).				
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	2.	. Instrumentation, Field and Laboratory		:		•
	a.	. Was instrumentation EPA referenced or its equ	uivalent?	[] Yes	[] N	o .
	b.	. Was instrumentation calibrated in accordance	with Depa	rtment p	rocedur	es?
		[] Yes [] No [] Unknown				
3.	Met	eteorological Data Used for Air Quality Modeling	3			·
	1.	Year(s) of data from // / to month day year	month o	/ day yea	<u>,</u>	
	2.	. Surface data obtained from (location)				
	3.	. Upper air (mixing height) data obtained from	(location)		
	4.	. Stability wind rose (STAR) data obtained from	ı (locatio	n)		
:.	Com	omputer Models Used				
	l.	M	lodified?	If yes,	attach	description.
	2.	· M	lodified?	If yes,	attach	description.
	3.	M	lodified?	If yes,	attach	description.
	4.					
		ttach copies of all final model runs showing inp iple output tables.	out data, i	receptor	locatio	ons, and prin
).	App	pplicants Maximum Allowable Emission Data		•		
	Pol	ollutant Emission Rate				
		TSP	gran	ms/sec		
	:	502	grai	ms/sec		
· .	Em i	mission Data Used in Modeling				
		ttach list of emission sources. Emission data r				

and normal operating time.

- Attach all other information supportive to the PSD review.
- Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). assessment of the environmental impact of the sources.
- 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.

DER Form 17-1.202(1) Effective November 30, 1982 ...

ATTACHMENT A

No.3 Line Multiple-Effect Evaporator Construction Permit Application

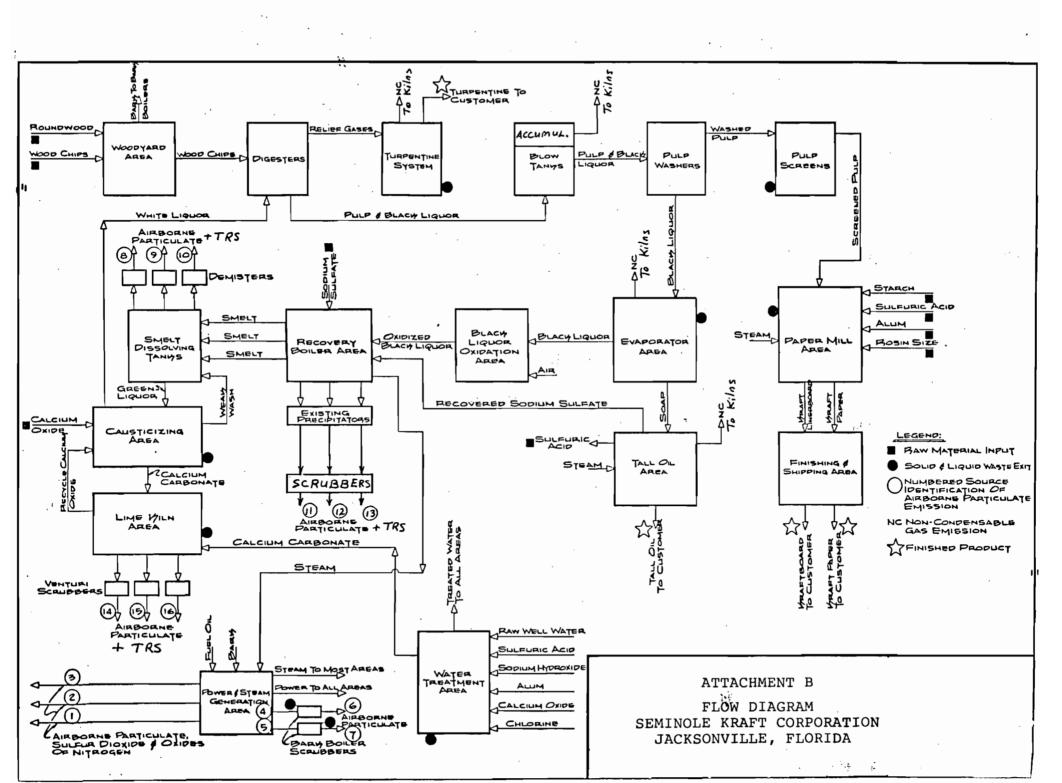
TRS emissions from multiple-effect evaporators are emitted from the condensate hotwells. The hotwell on No.3 Line multiple-effect evaporator was previously open to the atmosphere with no control of TRS.

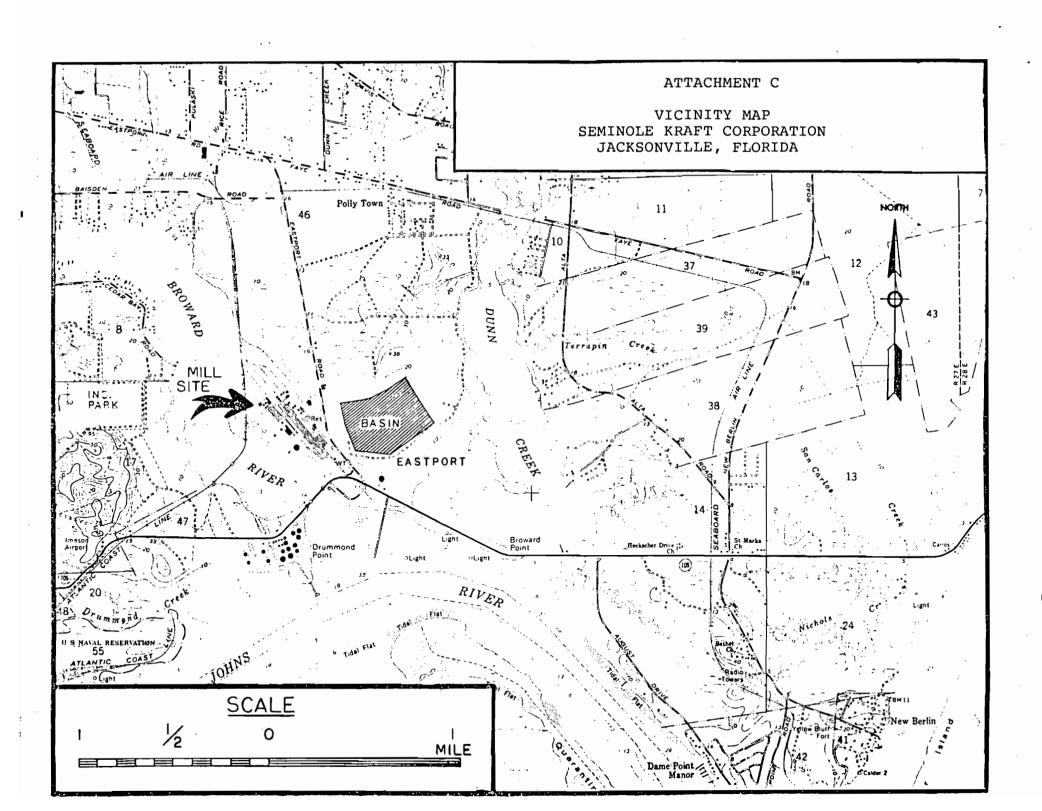
This construction permit will cover the installation of a stain-less steel sheet metal cover on the hotwell with a stack connected to the existing non-condensible gas collection (NCG) system. The cover and stack were installed first in order to analyze the TRS emissions. This was necessary to determine 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.

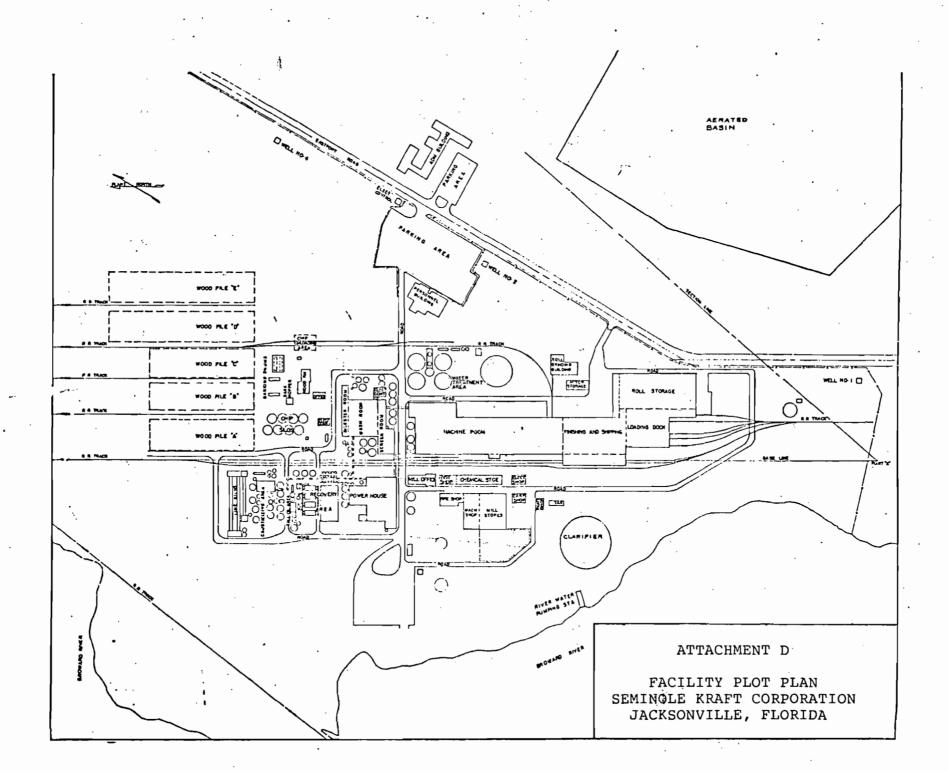
The trial demonstrated that the TRS gasses from all three lines of multiple-effect evaporators may safely be collected in the existing NCG system and incinerated in the lime kilns. Therefore, this construction permit application is to cover the existing installation which is currently in operation.

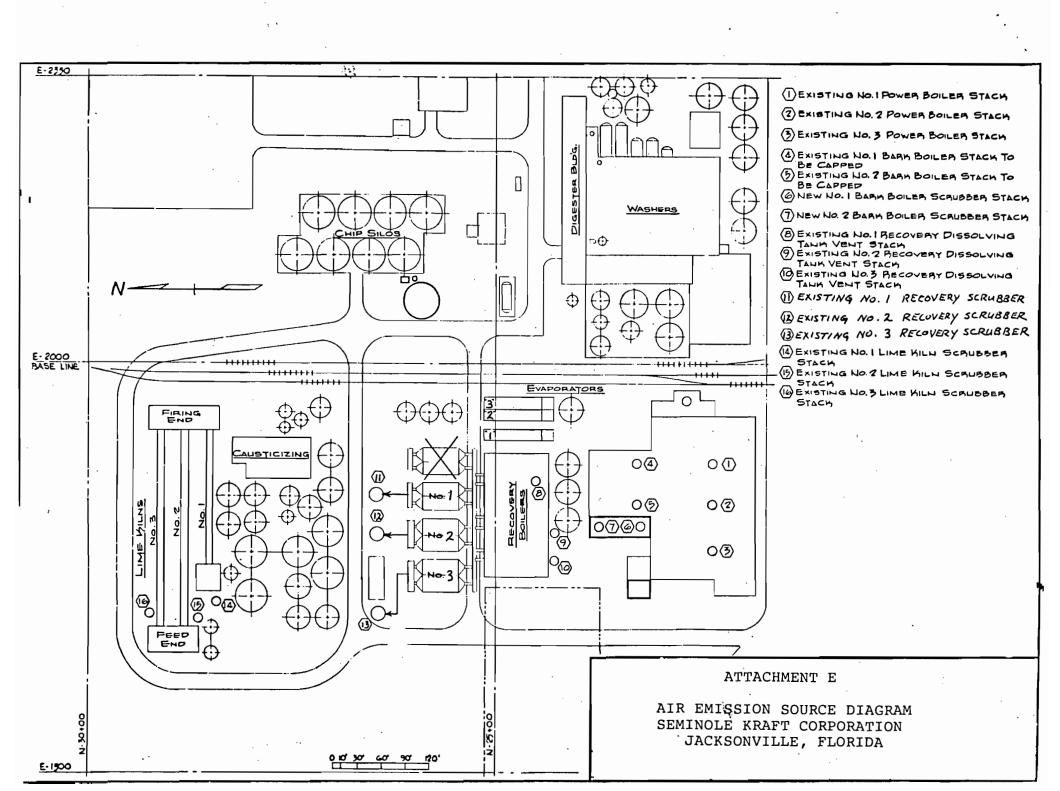
The use of lime kilns to achieve complete destruction of TRS compounds is a recognized technology that is well documented. AS stated in EPA 450/3-83-017, "Review of New Source Performance Standards for Kraft Pulp Mills", incineration in lime kilns adequately achieves the 1200°F and 0.5 second retention 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.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.









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:

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



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

ane

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 16-141799 16-141800 16-141801

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

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% O2, as a 12-hr avg. (1.86 lbs/hr, 8.2 TPY)
- d) SO2: 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 TPYb) 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:

The No. 1 Lime Kiln shall be tested one-time only for SO₂ 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.

The No. 1 Lime Kiln shall be tested one-time only for SO2 emissions to establish the level of SO2 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% O2, as a 12-hr avg. (2.06 lbs/hr, 9.0 TPY)
- d) SO2: 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% O2, as a 12-hr avg. (2.06 lbs/hr, 9.0 TPY)

d. <u>No. 6</u>:

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. <u>No. 13</u>:

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:

11 -

1) AC 16-141792

From: The No. 2 Lime Kiln shall be tested one-time only for SO₂ 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 SO₂ 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 SO₂ 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 SO₂ 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 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.

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% O₂ 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)l.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% O₂ 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. <u>No. 2</u>:

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.

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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.
- EPA's letter on NSPS guidelines dated October 23, 1987.
 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 16-141790 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.

Permit Number: AC 16-141790 Expiration Date: March 27, 1990

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;
 - 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.

Permit Number: AC 16-141790 Expiration Date: March 27, 1990

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 (RACT)
 - () 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.

Permit Number: AC 16-141790 Expiration Date: March 27, 1990

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.

- 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.

Permit Number: AC 16-141790 Expiration Date: March 27, 1990

- 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% O2, 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.

Permit Number: AC 16-141790 Expiration Date: March 27, 1990

SPECIFIC CONDITIONS:

- 11. The No. 1 Lime Kiln shall be tested one-time only for SO2 emissions to establish the level of SO2 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. reports of the tests shall be submitted to the BESD office within 45 days of test completion. 23 6
- 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.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Date Twachtmann, Secretary

Page 8 of 8



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,
- 2. BESD's letter requesting additional information received December 10, 1987.
- DER's incompleteness letter dated December 11, 1987.
 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.

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.

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

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;
 - 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.

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

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.

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

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.

- 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.

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

- 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:
 - Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY Visible Emissions (VE): 10% Opacity or less
 - b)
 - TRS: 20 ppmvd @ standard conditions corrected to 10% c) O₂, 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:
 - EPA Method 5, Determination of Particulate Emissions a) from Stationary Sources
 - EPA Method 9, Visual Determination of the Opacity of b) Emissions from Stationary Sources
 - EPA Method 16 or 16A, Determination of TRS Emissions c) 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)l.c., which includes the requirement of establishing a contingency plan.

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

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 Dday of 1988.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

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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,
- 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.
- EPA's letter on NSPS guidelines dated October 23, 1987.
 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.

Permit Number: AC 16-141793 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.

Permit Number: AC 16-141793 Expiration Date: March 27, 1990

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;
 - 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.

Permit Number: AC 16-141793
Expiration Date: March 27, 1990

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.

Permit Number: AC 16-141793 Expiration Date: March 27, 1990

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.

- 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.

Permit Number: AC 16-141793 Expiration Date: March 27, 1990

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 TPYb) 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:
 - EPA Method 5, Determination of Particulate Emissions a) from Stationary Sources
 - EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources
 - 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.

Permit Number: AC 16-141793 Expiration Date: March 27, 1990

SPECIFIC CONDITIONS:

- 13. The No. 3 Lime Kiln shall be tested one-time only for SO₂ emissions to establish the level of SO₂ 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 May of May

1988.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

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Florida Department of Environmental Regulation

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400 Dale Twachtmann, Secretary

Bob Martinez, Governor

John Shearer, Assistant Secretary

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

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

30° 25' 15"N Latitude/Longitude: 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 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 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.

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

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.

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

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.

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

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.

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

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.

- 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

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

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% O₂ 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)l.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.

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

- 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 SO₂ 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.

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

Issued this May of May 1988.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

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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:

- 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.

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

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.

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

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;
 - 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.

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

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 (RACT)
 - () 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.

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

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.

- 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.

Permit Number: AC 16-141799 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)l.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% O₂ 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)l.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.

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 SO₂ 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_

his_*/O*day

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 16-141800 Expiration Date: September 24, 1989

County: Duval

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

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 3-07-001-03 o MEE System

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

ATTACHMENTS

AC 16-141800

Attachments to be Incorporated:

- 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.

Permit Number: AC 16-141800 Expiration Date: Sept. 24, 1989

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.

Permit Number: AC 16-141800 Expiration Date: Sept. 24, 1989

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;
 - 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.

Permit Number: AC 16-141800 Expiration Date: Sept. 24, 1989

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.

Permit Number: AC 16-141800 Expiration Date: Sept. 24, 1989

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.

Permit Number: AC 16-141800 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)l.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% O₂ 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)l.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.

Permit Number: AC 16-141800 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. 2 MEE system.
- 16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO₂ 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.

ssued this d

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 16-141801 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.

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

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.

PERMITTEE:

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

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;
 - Inspecting the facility, equipment, practices, or operations regulated or required under this permit;
 - 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;
 - 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.

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

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.

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

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.

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)l.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% O₂ 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)l.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.

Permit Number: AC 16-141801 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. 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

day of Man

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

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

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the 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. POWFRS JR

April 14, 1988

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

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

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

RECEIVED

APR 1 5 1988

DER-BAOM

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

Mr. William A. Thomas, P.E. III April 14, 1988 Page 2

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

TC:slt 1003.010

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

Copied: Buce Mitchell
Reverep Book (4.19.88)
CHF1BT
Khurohid Milda, BESD

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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
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MARTHA J. EDENFIELD
R. L. CALEEN, JR.
WILLIAM E. POWERS, JR.

April 14, 1988 Revised April 15, 1988 SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301
TELEPHONE (904) 877-0099

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

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

RECEIVED

APR 15 1988

DER - BAQM

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

Mr. William A. Thomas, P.E. III April 14, 1988 Page 2

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

Mr. William A. Thomas, P.E. III April 14, 1988 Page 3

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

Sincerely,

for Terry Cole

TC:slt 1003.010

cc: Frank Lee

Malcolm Williams

Mike Riddle John Millican Curt Barton

Copies: Bruce Mitchel

Braideepo Raval

CHFIBT

Khurched Melda, BESO

4.19.88

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

25.25

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

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LAW OFFICES

OERTEL & HOFFMAN

A PROFESSIONAL ASSOCIATION

KENNETH G. OERTEL
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M. CHRISTOPHER BRYANT
W. DAVID WATKINS
MARTHA J. EDENFIELD
R. L. CALEEN, JR.
WILLIAM E. POWERS, JR.

April 18, 1988

SUITE C
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TALLAHASSEE, FLORIDA 32301
TELEPHONE (904) 877-0089

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

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

RECEIVED

APR 19 1988

DER - BAQM

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 SO₂ emissions to establish the level of SO₂ 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 SO₂ 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".

Mr. William A. Thomas, P.E. III April 18, 1988 Page 6

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.

4.19.88

Sincerely,

Terry Cole

TC:slt 1003.014

Copiel: CHFIBT

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ATTACHMENT 11 FOR AC 16-141798 Hand Nelimnek AC16-141798 Surmanach Krafit

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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).

35 -

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

<u>Basis</u>

Blow Systems = 2 (h

= 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

Hourly Capacity = 2 x 60 minutes x 14.7 AD Tons

= 118 TPH

Use - 120 Tons per hour, Air Dry Pulp

CC: Sterc Smallwood

CHF

BT

Pradeep Raval

Bours Middell