



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

November 2, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. L. A. Stanley
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

Dear Mr. Stanley:

Re: Amendment to Construction Permits-Expiration Date Extension
AC 16-208322 and -208323: Nos. 1 and 2 Bark Boilers

The Department has reviewed the above request contained in Mr. Terry Cole's letter received October 6, 1992. The request is acceptable and the following will be changed and added:

1. Expiration Date
From: December 31, 1992
To: December 31, 1993
2. Attachment to be Incorporated
o Mr. Terry Cole's letter received October 6, 1992.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the amendment applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit Amendment File Number(s) and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

Mr. L. A. Stanley
Amendment to AC 16-208322 and -208323
November 2, 1992
Page 2

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

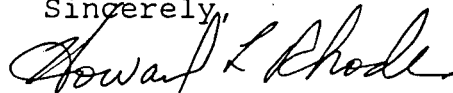
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

This letter must be attached to the construction permits, Nos. AC 16-208322 and -208323, and shall become a part of the permits.

Sincerely,



Howard L. Rhodes

Director

Division of Air Resources
Management

HLR/RBM/rbm

Attachments

cc: A. Kutyna, NED
R. Roberson, DCAQD
R. Donelan, Esq., DER
J. Braswell, Esq., DER
H. Oven, DER-PPS

G. Radlinski, Esq., City of JAX
D. Buff, P.E., KBN
T. Cole, Esq., OHF&C
C. Barton, SCC
C. Hurd, SCC

OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.

ATTORNEYS AT LAW

SUZANNE BROWNLESS
M. CHRISTOPHER BRYANT
R. L. CALEEN, JR.
C. ANTHONY CLEVELAND
TERRY COLE
ROBERT C. DOWNIE, II
MARTHA J. EDENFIELD
SEGUNDO J. FERNANDEZ
KENNETH F. HOFFMAN
NORMAN H. HORTON, JR.
KENNETH G. OERTEL
PATRICIA A. RENOVITCH
SCOTT SHIRLEY
THOMAS G. TOMASELLO
W. DAVID WATKINS

SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

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

TELEPHONE (904) 877-0099
FACSIMILE (904) 877-0981

JOHN H. MILLICAN
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

J. P. SUBRAMANI, Ph. D., P. E.
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

October 6, 1992

BY HAND DELIVERY

Mr. Clair Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

OCT 6 1992

Bureau of
Air Regulation

RE: Permit Nos. AC16-208322 and AC16-208323
Seminole Kraft Bark Boilers

Dear Mr. Fancy:

This letter is for the purpose of requesting an amendment to the above construction permits to allow an extension of time for filing the applications for operating permits from September 30, 1992, to December 31, 1993, for the two bark boilers at Seminole Kraft.

This is necessitated due to the fact that Seminole Kraft recently experienced a roof structure failure in the paper mill building that has resulted in a temporary curtailment of operation at its facility in Jacksonville. Because of this, the facility is shut down and it will be some time before normal operations can resume. Time is also required for scheduling of a sampling team, analysis of samples and preparation of an application. As you are aware, earlier this month the entire kraft pulping process was shut down several months earlier than required by DER permits.

If you have any questions regarding this, please let me know.

Sincerely,

Terry Cole
Terry Cole

TC/kp
Attachment: \$100.00
cc: Bruce Mitchell
Jeff Braswell
Larry Stanley
Mike Riddle
Craig Hurd



to CHF: 10-12-92 4:40
PR

DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Howard L. Rhodes

FROM: Clair Fancy

DATE: October 12, 1992

SUBJ: Amendment to Construction Permits-Expiration Date Extension
Seminole Kraft Corporation: Nos. 1 and 2 Bark Boilers
AC 16-208322 and -208323

Attached for your approval and signature is a letter amending the above referenced construction permits extending the expiration date. There is no controversy associated with this action.

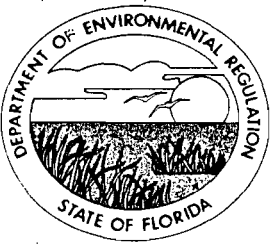
Seminole Kraft Corporation is now a 100% recycle fiber mill located in Jacksonville, Duval County, Florida. The original permits for the boilers to fire bark/wood waste and recycle fiber rejects were signed on September 1, 1992, with an expiration date of December 31, 1992. The reason that the permittee is requesting the additional time is that the roof of the building housing the paper machines collapsed and the mill needs time for repairs, compliance testing, and applying for operation permits. These bark boilers are the ones that were associated with the AES/Cedar Bay project.

I recommend approval and signature of this amendment.

HLR/CHF/rbm

Attachment

10-21-92
edited (date change)
back to PA
CHF included
to HLR for signature
PR



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 14, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. L. A. Stanley
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

Dear Mr. Stanley:

Re: Amendment to Construction Permits-Expiration Date Extension
AC 16-208322 and -208323: Nos. 1 and 2 Bark Boilers

The Department has reviewed the above request contained in Mr. Terry Cole's letter received October 6, 1992. The request is acceptable and the following will be changed and added:

1. Expiration Date
From: December 31, 1992
To: December 31, 1993
2. Attachment to be Incorporated
o Mr. Terry Cole's letter received October 6, 1992.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the amendment applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit Amendment File Number(s) and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

Mr. L. A. Stanley
Amendment to AC 16-208322 and -208323
October 14, 1992
Page 2

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

This letter must be attached to the construction permits, Nos. AC 16-208322 and -208323, and shall become a part of the permits.

Sincerely,

Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/RBM/rbm

Attachments

cc: A. Kutyna, NED
R. Roberson, DCAQD
R. Donelan, Esq., DER
J. Braswell, Esq., DER
H. Oven, DER-PPS

G. Radlinski, Esq., City of JAX
D. Buff, P.E., KBN
T. Cole, Esq., OHF&C
C. Barton, SCC
C. Hurd, SCC

OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.

ATTORNEYS AT LAW

SUZANNE BROWNLESS
M. CHRISTOPHER BRYANT
R. L. CALEEN, JR.
C. ANTHONY CLEVELAND
TERRY COLE
ROBERT C. DOWNIE, II
MARTHA J. EOENFIELD
SEGUNDO J. FERNANDEZ
KENNETH F. HOFFMAN
NORMAN H. HORTON, JR.
KENNETH G. OERTEL
PATRICIA A. RENOVITCH
SCOTT SHIRLEY
THOMAS G. TOMASELLO
W. DAVID WATKINS

SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

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

October 6, 1992

TELEPHONE (904) 877-0099
FACSIMILE (904) 877-0981

JOHN H. MILLICAN
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

J. P. SUBRAMANI, PH. D., P. E.
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

BY HAND DELIVERY

Mr. Clair Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

OCT 6 1992

Bureau of
Air Regulation

RE: Permit Nos. AC16-208322 and AC16-208323
Seminole Kraft Bark Boilers

Dear Mr. Fancy:

This letter is for the purpose of requesting an amendment to the above construction permits to allow an extension of time for filing the applications for operating permits from September 30, 1992, to December 31, 1993, for the two bark boilers at Seminole Kraft.

This is necessitated due to the fact that Seminole Kraft recently experienced a roof structure failure in the paper mill building that has resulted in a temporary curtailment of operation at its facility in Jacksonville. Because of this, the facility is shut down and it will be some time before normal operations can resume. Time is also required for scheduling of a sampling team, analysis of samples and preparation of an application. As you are aware, earlier this month the entire kraft pulping process was shut down several months earlier than required by DER permits.

If you have any questions regarding this, please let me know.

Sincerely,

Terry Cole
Terry Cole

TC/kp
Attachment: \$100.00
cc: Bruce Mitchell
Jeff Braswell
Larry Stanley
Mike Riddle
Craig Hurd

Terry\Seminole\Fancy.105

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMITS

In the matter of an
Application for Permits by:

DER File Nos. AC 16-208322
AC 16-208323
Duval County

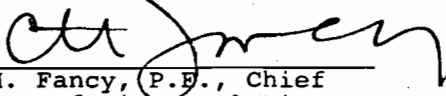
Mr. L. A. Stanley
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, FL 32229

Enclosed are Permits, Nos. AC 16-208322 and AC 16-208323, to modify the existing Nos. 1 and 2 Bark Boilers at the Seminole Kraft Corporation's facility located in Jacksonville, Duval County, Florida. These permits are issued pursuant to Sections 403, Florida Statutes.

Any party to these Orders (permits) has the right to seek judicial review of the permits 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 Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

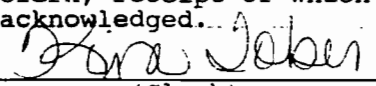

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMITS and all copies were mailed before the close of business on 9-2-92 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.


(Clerk)

9-2-92
(Date)

Copies furnished to:

- A. Kutyna, NE District
- R. Roberson, DCAQD
- D. Buff, P.E., KBN
- R. Donelan, Esq., DER
- H. Oven, DER-PPS
- G. Radlinski, Esq., City of Jacksonville
- T. Cole, Esq., OHF&C
- C. Barton, SCC
- C. Hurd, SCC

Final Determination

Seminole Kraft Corporation
Duval County
Jacksonville, Florida

Construction Permit Nos.
AC 16-208322
AC 16-208323

Department of Environmental Regulation
Division of Air Resources Management
~~Bureau of Air Regulation~~

August 31, 1992

Final Determination
Seminole Kraft Corporation
Duval County

AC 16-208322: Bark Boiler No. 1
AC 16-208323: Bark Boiler No. 2

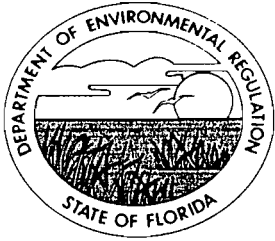
The construction permit application packages and supplementary material have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Florida Times-Union on June 30, 1992. The Technical Evaluation and Preliminary Determination of the revised construction permits was distributed on June 25, 1992, and available for public inspection at the Department's Northeast District office, the Department's Bureau of Air Regulation office, and the Duval County Air Quality Division office.

During the public notice period, a Verified Petition for a Formal Hearing, pursuant to Section 120.57, Florida Statutes, was received on July 15, 1992, by the Department's Office of General Counsel (OGC; OGC Case Nos. 92-1285 and 92-1286). On July 17, 1992, the Department's OGC received a Motion to Dismiss and Request for Final Issuance of Modified Permits. On August 5, 1992, the Department issued an Order Dismissing Petition with Leave to Amend, which allowed the petitioner 15 days to file an amended petition. Since an amended petition was not filed with the Department's OGC by the petitioner, the cases were deemed closed.

Attachments to be incorporated: AC 16-208322 and AC 16-208323

- o Proof of Publication of the Department's Intent to Issue in The Florida Times-Union issue of June 30, 1992, hand delivered to Mr. C. H. Fancy, Chief, Bureau of Air Regulation.
- o Verified Petition for a Formal Hearing pursuant to Section 120.57, Florida Statutes, received July 15, 1992, by the Department's OGC.
- o Motion to Dismiss and Request for Final Issuance of Modified Permits received July 17, 1992, by the Department's OGC.
- o Order Dismissing Petition with Leave to Amend issued by the Department's OGC on August 5, 1992.
- o Mr. Terry Cole's letter received August 24, 1992, by the Department's Division of Air Resources Management.

Based on the closing of OGC Cases 92-1285 and 92-1286, it is recommended that the construction permits, Nos. AC 16-208322 and AC 16-208323, be issued as drafted, with the above referenced attachments incorporated.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

I.D. Number: 31-16-0067-05

Permit Number: AC 16-208323

Expiration Date: December 31, 1992

County: Duval

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

UTM: E-7441.800 N-3365.575

Project: No. 2 Bark Boiler
Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, 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 existing No. 2 Bark Boiler (BB), Combustion Engineering Serial No. 18171, to establish federally enforceable permit conditions in accordance with 40 CFR 60.51a, Definition-Cofired Combustor. The No. 2 BB produces steam. Maximum heat input shall be 193×10^6 Btu per hour firing carbonaceous fuel (bark) and/or Bunker C or No. 6 Fuel Oil with a maximum sulfur content of 2.27% by weight; also, recycled rejects may be burned in combination with the other permitted fuels. Particulate matter emissions will be controlled by two sets of 4 each Buell VT Cyclone Separators in series with a Ducon Venturi Scrubber Type VVO.

The Standard Industrial Code is: Industry No. 2621-Paper Mills.

The Standard Classification Codes are:

- o External Combustion Boilers: 1-02-004-01 10³ gals burned
No. 6 Fuel Oil
- o External Combustion Boilers: 1-02-009-02 tons burned
Wood/Bark Waste
- o External Combustion Boilers: 1-02-012-01 tons burned
Bale Plastic Strapping/Wrapping

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

Attachments to be Incorporated:

1. Mr. Michael L. Riddle's letter with attachments dated November 6, 1991, and received November 12, 1991.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

Attachments cont.:

2. Mr. Craig Hurd's letter dated November 14, 1991, and received November 18, 1991.
3. Mr. C. H. Fancy's letter dated January 23, 1992.
4. Applications (2) to Construct/Modify Air Pollution Sources, DER Form 17-1.202(1), and cover letter from Mr. L. A. Stanley received February 10, 1992.
5. Mr. L. A. Stanley's letter dated April 3, 1992, to Mayor Ed Austin, City of Jacksonville.
6. Waiver of the 90-day Time Limit received May 8, 1992.
7. Technical Evaluation and Preliminary Determination dated June 24, 1992.
8. Proof of Publication of the Department's Intent to Issue in The Florida Times-Union issue of June 30, 1992, hand delivered to Mr. C. H. Fancy, Chief, Bureau of Air Regulation.
9. Verified Petition for a Formal Hearing pursuant to Section 120.57, Florida Statutes, received July 15, 1992, by the Department's OGC.
10. Motion to Dismiss and Request for Final Issuance of Modified Permits received July 17, 1992, by the Department's OGC.
11. Order Dismissing Petition with Leave to Amend issued by the Department's OGC on August 5, 1992.
12. Mr. Terry Cole's letter received August 24, 1992, by the Department's Division of Air Resources Management.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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. Neither 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 is not 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.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; 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.

6. The permittee shall 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor 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 provide the Department with the following information:

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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 for 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained 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 dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

14. 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 corrected promptly.

SPECIFIC CONDITIONS:

1. Permittee shall notify the Duval County Air Quality Division (DCAQD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)9., F.A.C., and Rule 2.501, Jacksonville Environmental Protection Board (J.E.P.B.).

2. Copies of the test report(s) shall be submitted to DCAQD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(8)(b), F.A.C., and Rule 2.501, J.E.P.B.

3. Testing of emissions shall be accomplished at a minimum of 90% of the permitted capacity. If testing is performed at a rate less than 90% of the permitted capacity, operation shall be limited to a maximum of 110% of the tested capacity until such time as an acceptable test is performed at a minimum of 90% of the permitted capacity. When operation is restricted to a lower capacity because of testing at such a level, DCAQD, upon advanced notification, will allow operation at higher capacities if such operation is for demonstrating compliance at a higher capacity.

4. Any revision(s) to a permit (and application) shall be submitted and approved prior to implementing.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

5. Control equipment shall be provided with a method of access that is safe and readily accessible.

6. Stack sampling facilities shall be required and shall comply with the requirements of Rule 17-2.700(4), F.A.C., and Rule 2.207, J.E.P.B.

7. Permittee shall submit an annual operation report to DCAQD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, F.A.C.

8. The following pollutant(s) shall be tested at intervals indicated from the date of July 1, 1988:

<u>Pt.No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
05	Particulate Matter (PM)	4 Months	EPA Reference Method (RM) No. 5

Fuel Oil Analysis (2.27% S) on Request *

Visible Emissions (VE) on Request EPA RM No. 9

*Sulfur (S) analysis of the No. 6 Fuel Oil shall be done in accordance with ASTM D 2622-82 (Sulfur in Petroleum Products - X Ray Spectrographic Method) or other method approved in advance by DCAQD, and shall be reported as the sulfur content by percent (%) weight.

Note: All test methods shall be in accordance with Rule 17-2.700, F.A.C., and 40 CFR 60, Appendix A (July, 1991 version).

9. The applicable emission limiting rules shall be as follows:

<u>Pt.No.</u>	<u>Pollutant</u>	<u>F.A.C.</u>	<u>J.E.P.B.</u>	<u>Other</u>
05	PM (carbonaceous fuel fired)	17-2.650(2)(c)3	2.207	
	PM (oil fired)	17-2.650(2)(c)3	2.207	
	VE	17-2.650(2)(c)3	2.207	

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

10. The maximum allowable emissions shall be as follows:

<u>Pt.No.</u>	<u>Pollutant</u>	<u>lbs/hr</u>	<u>T/yr</u>	<u>Other</u>	<u>Opacity</u>
05	PM (carbonaceous fuel fired)	38.6	169.07	0.2 lb/10 ⁶ Btu heat input	
	PM (oil fired)	19.3	*81.06	0.1 lb/10 ⁶ Btu heat input	

**PM (combination of
carbonaceous fuel
fired and oil fired)

VE

30%

- * Operating hours while firing oil shall be limited to 8400 per year.
- ** Any combination shall be limited to 193 x 10⁶ Btu/hr. The allowable PM emission for any combination shall be calculated based on the sum of the individual calculations for carbonaceous fuel and fuel oil.

11. Operation shall be allowed up to 8760 hours per year while firing carbonaceous fuel and recycle rejects.

12. An Operation and Maintenance Plan dated February 8, 1982 and revised by letter dated May 27, 1982 is attached to and part of this permit pursuant to RACT rules, Chapter 17-2, F.A.C. Operation and Maintenance records outlined by this plan shall be kept for a minimum period of two (2) years and be made available to DCAQD upon request.

13. The No. 2 Bark Boiler is subject to all applicable provisions of Chapters 17-2 and 17-4, F.A.C., and 40 CFR (July, 1991 version).

14. Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component (i.e., bale bindings: strapping and wrapping) of the total fuel feed into the No. 2 Bark Boiler shall be limited to 30 percent or less, by weight, on a 24-hour daily basis. However, the plastic component, referenced above, of the fuel shall be limited to only what is delivered with the recycled fiber bales and as described in Mr. Michael L. Riddle's letter dated November 6, 1991, and revised in Mr. Craig Hurd's letter dated November 14, 1991.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

15. The No. 2 Bark Boiler shall be permanently shut-down and made incapable of operation and its construction/operation permit(s) surrendered to the Department's Bureau of Air Regulation upon completion of the initial compliance tests on the AES/Cedar Bay boilers. The Duval County's Air Quality Division shall be specifically informed in writing within thirty days after the shut-down of the No. 2 Bark Boiler.

16. The No. 2 Bark Boiler is subject to the applicable provisions of F.A.C. Rules 17-4.130: Plant Operation-Problems; 17-2.240: Circumvention; and, 17-2.250: Excess Emissions.

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

18. Any change in the method of operation, raw materials, equipment, operating hours, etc., pursuant to F.A.C. Rule 17-2.100, Modification, the permittee shall submit an application and the appropriate processing fee to the Department's Bureau of Air Regulation office.

19. A one time test for HCl (hydrochloric acid) shall be conducted prior to the use of recycle rejects and during the use of recycle rejects in order to establish the potential emissions of this pollutant. EPA RM 26 shall be used to conduct the tests in accordance with 40 CFR 60, Appendix A (July, 1991 version).

20. This permit supercedes all air permits issued by the Department.

21. An application for an operation permit must be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

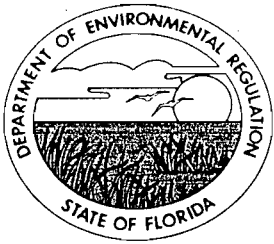
SPECIFIC CONDITIONS:

Issued this 1 day
of September, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Howard L. Rhodes, P.E.
Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

I.D. Number: 31-16-0067-04
Permit Number: AC 16-208322
Expiration Date: December 31, 1992
County: Duval
Latitude/Longitude: 30°25'15"N
81°36'00"W
UTM: E-7441.800 N-3365.575
Project: No. 1 Bark Boiler
Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, 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 existing No. 1 Bark Boiler (BB), Combustion Engineering Serial No. 16703, to establish federally enforceable permit conditions in accordance with 40 CFR 60.51a, Definition-Cofired Combustor. The No. 1 BB produces steam. Maximum heat input shall be 193×10^6 Btu per hour firing carbonaceous fuel (bark) and/or Bunker C or No. 6 Fuel Oil with a maximum sulfur content of 2.27% by weight; also, recycled rejects may be burned in combination with the other permitted fuels. Particulate matter emissions will be controlled by two sets of 4 each Buell VT Cyclone Separators in series with a Ducon Venturi Scrubber Type VVO.

The Standard Industrial Code is: Industry No. 2621-Paper Mills.

The Standard Classification Codes are:

- o External Combustion Boilers: 1-02-004-01 10³ gals burned
No. 6 Fuel Oil
- o External Combustion Boilers: 1-02-009-02 tons burned
Wood/Bark Waste
- o External Combustion Boilers: 1-02-012-01 tons burned
Bale Plastic Strapping/Wrapping

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

Attachments to be Incorporated:

1. Mr. Michael L. Riddle's letter with attachments dated November 6, 1991, and received November 12, 1991.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

Attachments cont.:

2. Mr. Craig Hurd's letter dated November 14, 1991, and received November 18, 1991.
3. Mr. C. H. Fancy's letter dated January 23, 1992.
4. Applications (2) to Construct/Modify Air Pollution Sources, DER Form 17-1.202(1), and cover letter from Mr. L. A. Stanley received February 10, 1992.
5. Mr. L. A. Stanley's letter dated April 3, 1992, to Mayor Ed Austin, City of Jacksonville.
6. Waiver of the 90-day Time Limit received May 8, 1992.
7. Technical Evaluation and Preliminary Determination dated June 24, 1992.
8. Proof of Publication of the Department's Intent to Issue in The Florida Times-Union issue of June 30, 1992, hand delivered to Mr. C. H. Fancy, Chief, Bureau of Air Regulation.
9. Verified Petition for a Formal Hearing pursuant to Section 120.57, Florida Statutes, received July 15, 1992, by the Department's OGC.
10. Motion to Dismiss and Request for Final Issuance of Modified Permits received July 17, 1992, by the Department's OGC.
11. Order Dismissing Petition with Leave to Amend issued by the Department's OGC on August 5, 1992.
12. Mr. Terry Cole's letter received August 24, 1992, by the Department's Division of Air Resources Management.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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. Neither 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 is not 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.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; 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.

6. The permittee shall 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor 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 provide the Department with the following information:

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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 for 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained 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 dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

14. 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 corrected promptly.

SPECIFIC CONDITIONS:

1. Permittee shall notify the Duval County Air Quality Division (DCAQD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)9., F.A.C., and Rule 2.501, Jacksonville Environmental Protection Board (J.E.P.B.).

2. Copies of the test report(s) shall be submitted to DCAQD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(8)(b), F.A.C., and Rule 2.501, J.E.P.B.

3. Testing of emissions shall be accomplished at a minimum of 90% of the permitted capacity. If testing is performed at a rate less than 90% of the permitted capacity, operation shall be limited to a maximum of 110% of the tested capacity until such time as an acceptable test is performed at a minimum of 90% of the permitted capacity. When operation is restricted to a lower capacity because of testing at such a level, DCAQD, upon advanced notification, will allow operation at higher capacities if such operation is for demonstrating compliance at a higher capacity.

4. Any revision(s) to a permit (and application) shall be submitted and approved prior to implementing.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

5. Control equipment shall be provided with a method of access that is safe and readily accessible.

6. Stack sampling facilities shall be required and shall comply with the requirements of Rule 17-2.700(4), F.A.C., and Rule 2.207, J.E.P.B.

7. Permittee shall submit an annual operation report to DCAQD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, F.A.C.

8. The following pollutant(s) shall be tested at intervals indicated from the date of July 1, 1988:

<u>Pt.No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
04	Particulate Matter (PM)	4 Months	EPA Reference Method (RM) No. 5

Fuel Oil Analysis (2.27% S) on Request *

Visible Emissions (VE) on Request EPA RM No. 9

*Sulfur (S) analysis of the No. 6 Fuel Oil shall be done in accordance with ASTM D 2622-82 (Sulfur in Petroleum Products - X Ray Spectrographic Method) or other method approved in advance by DCAQD, and shall be reported as the sulfur content by percent (%) weight.

Note: All test methods shall be in accordance with Rule 17-2.700, F.A.C., and 40 CFR 60, Appendix A (July, 1991 version).

9. The applicable emission limiting rules shall be as follows:

<u>Pt.No.</u>	<u>Pollutant</u>	<u>F.A.C.</u>	<u>J.E.P.B.</u>	<u>Other</u>
04	PM (carbonaceous fuel fired)	17-2.650(2)(c)3	2.207	
	PM (oil fired)	17-2.650(2)(c)3	2.207	
	VE	17-2.650(2)(c)3	2.207	

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

10. The maximum allowable emissions shall be as follows:

<u>Pt.No.</u>	<u>Pollutant</u>	<u>lbs/hr</u>	<u>T/yr</u>	<u>Other</u>	<u>Opacity</u>
04	PM (carbonaceous fuel fired)	38.6	169.07	0.2 lb/10 ⁶ Btu heat input	
	PM (oil fired)	19.3	*81.06	0.1 lb/10 ⁶ Btu heat input	

**PM (combination of
carbonaceous fuel
fired and oil fired)

VE

30%

* Operating hours while firing oil shall be limited to 8400 per year.

** Any combination shall be limited to 193×10^6 Btu/hr. The allowable PM emission for any combination shall be calculated based on the sum of the individual calculations for carbonaceous fuel and fuel oil.

11. Operation shall be allowed up to 8760 hours per year while firing carbonaceous fuel and recycle rejects.

12. An Operation and Maintenance Plan dated February 8, 1982 and revised by letter dated May 27, 1982 is attached to and part of this permit pursuant to RACT rules, Chapter 17-2, F.A.C. Operation and Maintenance records outlined by this plan shall be kept for a minimum period of two (2) years and be made available to DCAQD upon request.

13. The No. 1 Bark Boiler is subject to all applicable provisions of Chapters 17-2 and 17-4, F.A.C., and 40 CFR (July, 1991 version).

14. Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component (i.e., bale bindings: strapping and wrapping) of the total fuel feed into the No. 1 Bark Boiler shall be limited to 30 percent or less, by weight, on a 24-hour daily basis. However, the plastic component, referenced above, of the fuel shall be limited to only what is delivered with the recycled fiber bales and as described in Mr. Michael L. Riddle's letter dated November 6, 1991, and revised in Mr. Craig Hurd's letter dated November 14, 1991.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

15. The No. 1 Bark Boiler shall be permanently shut-down and made incapable of operation and its construction/operation permit(s) surrendered to the Department's Bureau of Air Regulation upon completion of the initial compliance tests on the AES/Cedar Bay boilers. The Duval County's Air Quality Division shall be specifically informed in writing within thirty days after the shut-down of the No. 1 Bark Boiler.

16. The No. 1 Bark Boiler is subject to the applicable provisions of F.A.C. Rules 17-4.130: Plant Operation-Problems; 17-2.240: Circumvention; and, 17-2.250: Excess Emissions.

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

18. Any change in the method of operation, raw materials, equipment, operating hours, etc., pursuant to F.A.C. Rule 17-2.100, Modification, the permittee shall submit an application and the appropriate processing fee to the Department's Bureau of Air Regulation office.

19. A one time test for HCl (hydrochloric acid) shall be conducted prior to the use of recycle rejects and during the use of recycle rejects in order to establish the potential emissions of this pollutant. EPA RM 26 shall be used to conduct the tests in accordance with 40 CFR 60, Appendix A (July, 1991 version).

20. This permit supercedes all air permits issued by the Department.

21. An application for an operation permit must be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

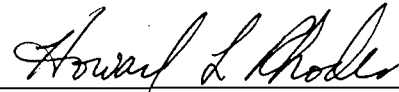
PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

Issued this 1 day
of September, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Howard L. Rhodes, P.E.
Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 24, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED


Mr. L. A. Stanley
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

Dear Mr. Stanley:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permits to modify the existing Nos. 1 and 2 Bark Boilers (i.e., to be permitted to combust recycle fiber rejects and the fiber bale's plastic strapping and wrapping); also, to establish a federally enforceable permit condition to define the sources as cofired combustors pursuant to 40 CFR 60.51a (July, 1991 version).

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis of the Bureau of Air Regulation.

Sincerely,


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

CHF/BM/bm

Attachments

c: A. Kutyna, NE District
R. Roberson, DCAQD
D. Buff, P.E., KBN
R. Donelan, Esq., DER
H. Oven, DER-PPS
G. Radlinski, Esq., City of Jacksonville
T. Cole, Esq., OHF&C
C. Barton, SCC
C. Hurd, SCC

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permits by:

Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

DER File Nos. AC 16-208322
AC 16-208323

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue air construction permits (copies attached) for the proposed project as detailed in the applications specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Seminole Kraft Corporation, applied on February 10, 1992, to the Department of Environmental Regulation for permits to modify the existing Nos. 1 and 2 Bark Boilers (i.e., recycle fiber project); also, to establish a federally enforceable permit condition to define the sources as cofired combustors pursuant to 40 CFR 60.51a (July, 1991 version).

The Department has permitting jurisdiction under Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits are required for the proposed work.

Pursuant to Section 403.815, F.S., and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permits. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permits. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400,

within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

Any person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S.. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,


(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department.

Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


for James K. Pennington
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copies furnished to:

A. Kutyna, NE District
R. Roberson, DCAQD
D. Buff, P.E., KBN
R. Donelan, Esq., DER
H. Oven, DER-PPS
G. Radlinski, Esq., City of Jacksonville
T. Cole, Esq., OHF&C
C. Barton, SCC
C. Hurd, SCC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on

6-25-92

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes,
with the designated Department
Clerk, receipt of which is
hereby acknowledged.


Clerk

6-25-92
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

AC 16-208322: No. 1 Bark Boiler
AC 16-208323: No. 2 Bark Boiler

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Seminole Kraft Corporation, 9469 Eastport Road, Jacksonville, Duval County, Florida 32229, to modify the existing Nos. 1 and 2 Bark Boilers (i.e., recycle fiber project); also, to establish a federally enforceable permit condition to define the sources as cofired combustors pursuant to 40 CFR 60.51a (July, 1991 version). A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Northeast District
7825 Baymeadows Way
Jacksonville, Florida 32256-7577

Duval County Air Quality Division
421 West Church Street
Suite 412
Jacksonville, Florida 32202-4111

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Seminole Kraft Corporation
Duval County
Jacksonville, Florida

Construction Permit Numbers
AC 16-208322
AC 16-208323

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

June 24, 1992

I. Application

A. Applicant

Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

B. Project and Location

Seminole Kraft Corporation (SKC) submitted applications to modify the existing Nos. 1 and 2 Bark Boilers (i.e., to be permitted to combust the recycle fiber rejects and the fiber bale's plastic strapping and wrapping); also, to establish a federally enforceable permit condition to define the sources as cofired combustors pursuant to 40 CFR 60.51a (July, 1991 version). The project will occur at SKC's facility/mill located in Duval County.

The UTM coordinates are Zone 17, 441.800 km East and 3,365.575 km North.

C. Source Description and Controls

The Nos. 1 and 2 Bark Boilers (BB) are steam generating power boilers that are permitted to fire a combination of woodwaste/bark and/or Bunker C or No. 6 Fuel Oil (maximum of 2.27% sulfur content, by weight); also, the sources will be permitted to combust the recycle fiber rejects and the fiber bale's plastic strapping and wrapping in combination with the other permitted fuels. Each boiler's maximum heat input shall be 193×10^6 Btu per hour.

For each boiler, the pollutant emissions of particulate matter (PM) and visible emissions (VE) are controlled by two sets of 4 each Buell VT cyclone separators in series with a Ducon venturi scrubber type VVO. The fly ash collected is sold or reinjected into the boiler. The scrubber effluent is sent to the primary clarifier where it is dewatered with the primary sludge and landfilled on-site.

D. The Source Classification Code are:

- o External Combustion Boilers: 1-02-004-01 10^3 gals burned
No. 6 Fuel Oil
- o External Combustion Boilers: 1-02-009-02 tons burned
Wood/Bark Waste
- o External Combustion Boilers: 1-02-012-01 tons burned
Bale Plastic Strapping/Wrapping

II. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version).

The applications were deemed complete on February 10, 1992.

The facility is currently located in an area designated as nonattainment for ozone, pursuant to F.A.C. Rule 17-2.410, and unclassifiable for PM₁₀ and SO₂, pursuant to F.A.C. Rules 17-2.430(1)(a) and 17-2.430(2), respectively. However, the existing sources were in an area designated nonattainment area for TSP (total suspended particulate) when originally permitted pursuant to F.A.C. Rule 17-2.650, Reasonable Available Control Technology (RACT). Therefore, the previous RACT emission limiting standards shall still be imposed pursuant to F.A.C. Rule 17-2.400(1)(d).

The facility is a major emitting facility for the pollutants of PM, SO₂ (sulfur dioxide), NO_x (nitrogen oxides), CO (carbon monoxide), VOC (volatile organic compounds), and TRS (total reduced sulfur) in accordance with F.A.C. Rule 17-2.100, Definitions.

Since there are no anticipated increases in actual/potential pollutant emissions associated with this project, then the pollutant emissions are subject to review in accordance with F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration (PSD) or Nonattainment Requirements.

There will be a one-time test requirement for HCl (hydrochloric acid) in order to establish the potential emissions of this pollutant...one test is to be conducted prior to the combustion of the recycle fiber rejects and the fiber bale's plastic strapping and wrapping and one while combusting this material. The tests shall be conducted using EPA Reference Method 26 in accordance with 40 CFR 60, Appendix A (July, 1991 version).

The Nos. 1 and 2 BB are subject to the applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; 17-2.620(2): Objectionable Odor Prohibited; 17-2.650(2)(c)3.: Carbonaceous Fuel Burners; and, 17-2.700: Stationary Point Source Emission Test Procedures. All applicable provisions of the 40 CFR shall be in accordance with the July, 1991 version.

The Nos. 1 and 2 BB will be defined as Cofired Combustors. Pursuant to 40 CFR 60.51a, the plastic component (i.e., bale bindings: strapping and wrapping) of the total fuel feed into each boiler shall be limited to 30 percent or less, by weight, on a 24-hour daily basis. However, the plastic component, referenced above, of the fuel shall be limited to only what is delivered with the recycle fiber bales and as described in Mr. Michael L. Riddle's letter dated November 6, 1991, and revised in Mr. Craig Hurd's letter dated November 14, 1991.

III. Emission Limitations and Air Quality Analysis

A. Emission Limitations

The air pollutant emissions regulated from the Nos. 1 and 2 BB are PM. The Nos. 1 and 2 BB are also subject to a VE standard. The maximum emission limitations for each boiler are:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>T/yr</u>	<u>Other</u>	<u>Opacity</u>
PM (carbonaceous fuel fired)	38.6	169.07	0.2 lb/10 ⁶ Btu heat input	
PM (oil fired)	19.3	*81.06	0.1 lb/10 ⁶ Btu heat input	

**PM (combination of carbonaceous fuel fired and oil fired)

VE

30%

* Operating hours while firing oil shall be limited to 8400 per year.

** Any combination shall be limited to 193 x 10⁶ Btu/hr. The allowable PM emission for any combination shall be calculated based on the sum of the individual calculations for carbonaceous fuel and fuel oil.

B. Air Quality Analysis

Based on a technical review, an air quality analysis was not required.

IV. Conclusion

Based on the information provided by SKC, the Department has reasonable assurance that the proposed project, to acquire a construction permit for the purpose of establishing federally

enforceable permit conditions for the Nos. 1 and 2 Bark Boilers (i.e., defined as cofired combustors) and to be permitted to combust the recycle fiber rejects and the fiber bale's plastic strapping and wrapping, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.

S. J. Henry
PE # 41755



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

I.D. Number: 31-16-0067-04
Permit Number: AC 16-208322
Expiration Date: December 31, 1992
County: Duval
Latitude/Longitude: 30°25'15"N
81°36'00"W
UTM: E-7441.800 N-3365.575
Project: No. 1 Bark Boiler
Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, 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 existing No. 1 Bark Boiler (BB), Combustion Engineering Serial No. 16703, to establish federally enforceable permit conditions in accordance with 40 CFR 60.51a, Definition-Cofired Combustor. The No. 1 BB produces steam. Maximum heat input shall be 193×10^6 Btu per hour firing carbonaceous fuel (bark) and/or Bunker C or No. 6 Fuel Oil with a maximum sulfur content of 2.27% by weight; also, recycled rejects may be burned in combination with the other permitted fuels. Particulate matter emissions will be controlled by two sets of 4 each Buell VT Cyclone Separators in series with a Ducon Venturi Scrubber Type VVO.

The Standard Industrial Code is: Industry No. 2621-Paper Mills.

The Standard Classification Codes are:

- o External Combustion Boilers: 1-02-004-01 10³ gals burned
No. 6 Fuel Oil
- o External Combustion Boilers: 1-02-009-02 tons burned
Wood/Bark Waste
- o External Combustion Boilers: 1-02-012-01 tons burned
Bale Plastic Strapping/Wrapping

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

Attachments to be Incorporated:

1. Mr. Michael L. Riddle's letter with attachments dated November 6, 1991, and received November 12, 1991.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

Attachments cont.:

2. Mr. Craig Hurd's letter dated November 14, 1991, and received November 18, 1991.
3. Mr. C. H. Fancy's letter dated January 23, 1992.
4. Applications (2) to Construct/Modify Air Pollution Sources, DER Form 17-1.202(1), and cover letter from Mr. L. A. Stanley received February 10, 1992.
5. Mr. L. A. Stanley's letter dated April 3, 1992, to Mayor Ed Austin, City of Jacksonville.
6. Waiver of the 90-day Time Limit received May 8, 1992.
7. Technical Evaluation and Preliminary Determination dated June 24, 1992.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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. Neither 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 is not 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 acknowledgment 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, or plant life, or

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

property caused by the construction or operation of this permitted source, or from penalties therefore; 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.

6. The permittee shall 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor 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 provide the Department with the following information:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

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 for 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

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 dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

14. 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 corrected promptly.

SPECIFIC CONDITIONS:

1. Permittee shall notify the Duval County Air Quality Division (DCAQD) fifteen (15) days prior to source testing with Rule 17-2.700(2)(a)9., F.A.C., and Rule 2.501, Jacksonville Environmental Protection Board (J.E.P.B.).

2. Copies of the test report(s) shall be submitted to DCAQD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(8)(b), F.A.C., and Rule 2.501, J.E.P.B.

3. Testing of emissions shall be accomplished at a minimum of 90% of the permitted capacity. If testing is performed at a rate less than 90% of the permitted capacity, operation shall be limited to a maximum of 110% of the tested capacity until such time as an acceptable test is performed at a minimum of 90% of the permitted capacity. When operation is restricted to a lower capacity because of testing at such a level, DCAQD, upon advanced notification, will allow operation at higher capacities if such operation is for demonstrating compliance at a higher capacity.

4. Any revision(s) to a permit (and application) shall be submitted and approved prior to implementing.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

5. Control equipment shall be provided with a method of access that is safe and readily accessible.

6. Stack sampling facilities shall be required and shall comply with the requirements of Rule 17-2.700(4), F.A.C., and Rule 2.207, J.E.P.B.

7. Permittee shall submit an annual operation report to DCAQD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, F.A.C.

8. The following pollutant(s) shall be tested at intervals indicated from the date of July 1, 1988:

<u>Pt.No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
04	Particulate Matter (PM)	4 Months	EPA Reference Method (RM) No. 5

Fuel Oil Analysis (2.27% S) on Request *

Visible Emissions (VE) on Request EPA RM No. 9

*Sulfur (S) analysis of the No. 6 Fuel Oil shall be done in accordance with ASTM D 2622-82 (Sulfur in Petroleum Products - X Ray Spectrographic Method) or other method approved in advance by DCAQD, and shall be reported as the sulfur content by percent (%) weight.

Note: All test methods shall be in accordance with Rule 17-2.700, F.A.C., and 40 CFR 60, Appendix A (July, 1991 version).

9. The applicable emission limiting rules shall be as follows:

<u>Pt.No.</u>	<u>Pollutant</u>	<u>F.A.C.</u>	<u>J.E.P.B.</u>	<u>Other</u>
04	PM (carbonaceous fuel fired)	17-2.650(2)(c)3	2.207	
	PM (oil fired)	17-2.650(2)(c)3	2.207	
	VE	17-2.650(2)(c)3	2.207	

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

10. The maximum allowable emissions shall be as follows:

<u>Pt.No.</u>	<u>Pollutant</u>	<u>lbs/hr</u>	<u>T/yr</u>	<u>Other</u>	<u>Opacity</u>
04	PM (carbonaceous fuel fired)	38.6	169.07	0.2 lb/10 ⁶ Btu heat input	
	PM (oil fired)	19.3	*81.06	0.1 lb/10 ⁶ Btu heat input	

**PM (combination of
carbonaceous fuel
fired and oil fired)

VE

30%

* Operating hours while firing oil shall be limited to 8400 per year.

** Any combination shall be limited to 193×10^6 Btu/hr. The allowable PM emission for any combination shall be calculated based on the sum of the individual calculations for carbonaceous fuel and fuel oil.

11. Operation shall be limited to 8760 hours per year while firing carbonaceous fuel and recycle rejects.

12. An Operation and Maintenance Plan dated February 8, 1982 and revised by letter dated May 27, 1982 is attached to and part of this permit pursuant to RACT rules, Chapter 17-2, F.A.C. Operation and Maintenance records outlined by this plan shall be kept for a minimum period of two (2) years and be made available to DCAQD upon request.

13. The No. 1 Bark Boiler is subject to all applicable provisions of Chapters 17-2 and 17-4, F.A.C., and 40 CFR (July, 1991 version).

14. Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component (i.e., bale bindings: strapping and wrapping) of the total fuel feed into the No. 1 Bark Boiler shall be limited to 30 percent or less, by weight, on a 24-hour daily basis. However, the plastic component, referenced above, of the fuel shall be limited to only what is delivered with the recycled fiber bales and as described in Mr. Michael L. Riddle's letter dated November 6, 1991, and revised in Mr. Craig Hurd's letter dated November 14, 1991.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

15. The No. 1 Bark Boiler shall be permanently shut-down and made incapable of operation and its construction/operation permit(s) surrendered to the Department's Bureau of Air Regulation upon completion of the initial compliance tests on the AES/Cedar Bay boilers. The Duval County's Air Quality Division shall be specifically informed in writing within thirty days after the shut-down of the No. 1 Bark Boiler.

16. The No. 1 Bark Boiler is subject to the applicable provisions of F.A.C. Rules 17-4.130: Plant Operation-Problems; 17-2.240: Circumvention; and, 17-2.250: Excess Emissions.

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

18. Any change in the method of operation, raw materials, equipment, operating hours, etc., pursuant to F.A.C. Rule 17-2.100, Modification, the permittee shall submit an application and the appropriate processing fee to the Department's Bureau of Air Regulation office.

19. A one time test for HCl (hydrochloric acid) shall be conducted prior to the use of recycle rejects and during the use of recycle rejects in order to establish the potential emissions of this pollutant. EPA RM 26 shall be used to conduct the tests in accordance with 40 CFR 60, Appendix A (July, 1991 version).

20. This permit supercedes all air permits issued by the Department.

21. An application for an operation permit must be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208322
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

Issued this _____ day
of _____, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Howard L. Rhodes, P.E.
Interim Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

I.D. Number: 31-16-0067-05
Permit Number: AC 16-208323
Expiration Date: December 31, 1992
County: Duval
Latitude/Longitude: 30°25'15"N
81°36'00"W
UTM: E-7441.800 N-3365.575
Project: No. 2 Bark Boiler
Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, 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 existing No. 2 Bark Boiler (BB), Combustion Engineering Serial No. 18171, to establish federally enforceable permit conditions in accordance with 40 CFR 60.51a, Definition-Cofired Combustor. The No. 2 BB produces steam. Maximum heat input shall be 193×10^6 Btu per hour firing carbonaceous fuel (bark) and/or Bunker C or No. 6 Fuel Oil with a maximum sulfur content of 2.27% by weight; also, recycled rejects may be burned in combination with the other permitted fuels. Particulate matter emissions will be controlled by two sets of 4 each Buell VT Cyclone Separators in series with a Ducon Venturi Scrubber Type VVO.

The Standard Industrial Code is: Industry No. 2621-Paper Mills.

The Standard Classification Codes are:

- o External Combustion Boilers: 1-02-004-01 10³ gals burned
No. 6 Fuel Oil
- o External Combustion Boilers: 1-02-009-02 tons burned
Wood/Bark Waste
- o External Combustion Boilers: 1-02-012-01 tons burned
Bale Plastic Strapping/Wrapping

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

Attachments to be Incorporated:

1. Mr. Michael L. Riddle's letter with attachments dated November 6, 1991, and received November 12, 1991.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

Attachments cont.:

2. Mr. Craig Hurd's letter dated November 14, 1991, and received November 18, 1991.
3. Mr. C. H. Fancy's letter dated January 23, 1992.
4. Applications (2) to Construct/Modify Air Pollution Sources, DER Form 17-1.202(1), and cover letter from Mr. L. A. Stanley received February 10, 1992.
5. Mr. L. A. Stanley's letter dated April 3, 1992, to Mayor Ed Austin, City of Jacksonville.
6. Waiver of the 90-day Time Limit received May 8, 1992.
7. Technical Evaluation and Preliminary Determination dated June 24, 1992.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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. Neither 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 is not 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 acknowledgment 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, or plant life, or

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

property caused by the construction or operation of this permitted source, or from penalties therefore; 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.

6. The permittee shall 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor 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 provide the Department with the following information:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

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 for 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

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 dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

14. 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 corrected promptly.

SPECIFIC CONDITIONS:

1. Permittee shall notify the Duval County Air Quality Division (DCAQD) fifteen (15) days prior to source testing with Rule 17-2.700(2)(a)9., F.A.C., and Rule 2.501, Jacksonville Environmental Protection Board (J.E.P.B.).

2. Copies of the test report(s) shall be submitted to DCAQD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(8)(b), F.A.C., and Rule 2.501, J.E.P.B.

3. Testing of emissions shall be accomplished at a minimum of 90% of the permitted capacity. If testing is performed at a rate less than 90% of the permitted capacity, operation shall be limited to a maximum of 110% of the tested capacity until such time as an acceptable test is performed at a minimum of 90% of the permitted capacity. When operation is restricted to a lower capacity because of testing at such a level, DCAQD, upon advanced notification, will allow operation at higher capacities if such operation is for demonstrating compliance at a higher capacity.

4. Any revision(s) to a permit (and application) shall be submitted and approved prior to implementing.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

5. Control equipment shall be provided with a method of access that is safe and readily accessible.

6. Stack sampling facilities shall be required and shall comply with the requirements of Rule 17-2.700(4), F.A.C., and Rule 2.207, J.E.P.B.

7. Permittee shall submit an annual operation report to DCAQD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, F.A.C.

8. The following pollutant(s) shall be tested at intervals indicated from the date of July 1, 1988:

<u>Pt.No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
05	Particulate Matter (PM)	4 Months	EPA Reference Method (RM) No. 5

Fuel Oil Analysis (2.27% S) on Request *

Visible Emissions (VE) on Request EPA RM No. 9

*Sulfur (S) analysis of the No. 6 Fuel Oil shall be done in accordance with ASTM D 2622-82 (Sulfur in Petroleum Products - X Ray Spectrographic Method) or other method approved in advance by DCAQD, and shall be reported as the sulfur content by percent (%) weight.

Note: All test methods shall be in accordance with Rule 17-2.700, F.A.C., and 40 CFR 60, Appendix A (July, 1991 version).

9. The applicable emission limiting rules shall be as follows:

<u>Pt.No.</u>	<u>Pollutant</u>	<u>F.A.C.</u>	<u>J.E.P.B.</u>	<u>Other</u>
05	PM (carbonaceous fuel fired)	17-2.650(2)(c)3	2.207	
	PM (oil fired)	17-2.650(2)(c)3	2.207	
	VE	17-2.650(2)(c)3	2.207	

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

10. The maximum allowable emissions shall be as follows:

<u>Pt.No.</u>	<u>Pollutant</u>	<u>lbs/hr</u>	<u>T/yr</u>	<u>Other</u>	<u>Opacity</u>
05	PM (carbonaceous fuel fired)	38.6	169.07	0.2 lb/10 ⁶ Btu heat input	
	PM (oil fired)	19.3	*81.06	0.1 lb/10 ⁶ Btu heat input	

**PM (combination of carbonaceous fuel fired and oil fired)

VE

30%

* Operating hours while firing oil shall be limited to 8400 per year.

** Any combination shall be limited to 193 x 10⁶ Btu/hr. The allowable PM emission for any combination shall be calculated based on the sum of the individual calculations for carbonaceous fuel and fuel oil.

11. Operation shall be limited to 8760 hours per year while firing carbonaceous fuel and recycle rejects.

12. An Operation and Maintenance Plan dated February 8, 1982 and revised by letter dated May 27, 1982 is attached to and part of this permit pursuant to RACT rules, Chapter 17-2, F.A.C. Operation and Maintenance records outlined by this plan shall be kept for a minimum period of two (2) years and be made available to DCAQD upon request.

13. The No. 2 Bark Boiler is subject to all applicable provisions of Chapters 17-2 and 17-4, F.A.C., and 40 CFR (July, 1991 version).

14. Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component (i.e., bale bindings: strapping and wrapping) of the total fuel feed into the No. 2 Bark Boiler shall be limited to 30 percent or less, by weight, on a 24-hour daily basis. However, the plastic component, referenced above, of the fuel shall be limited to only what is delivered with the recycled fiber bales and as described in Mr. Michael L. Riddle's letter dated November 6, 1991, and revised in Mr. Craig Hurd's letter dated November 14, 1991.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

15. The No. 2 Bark Boiler shall be permanently shut-down and made incapable of operation and its construction/operation permit(s) surrendered to the Department's Bureau of Air Regulation upon completion of the initial compliance tests on the AES/Cedar Bay boilers. The Duval County's Air Quality Division shall be specifically informed in writing within thirty days after the shut-down of the No. 2 Bark Boiler.

16. The No. 2 Bark Boiler is subject to the applicable provisions of F.A.C. Rules 17-4.130: Plant Operation-Problems; 17-2.240: Circumvention; and, 17-2.250: Excess Emissions.

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

18. Any change in the method of operation, raw materials, equipment, operating hours, etc., pursuant to F.A.C. Rule 17-2.100, Modification, the permittee shall submit an application and the appropriate processing fee to the Department's Bureau of Air Regulation office.

19. A one time test for HCl (hydrochloric acid) shall be conducted prior to the use of recycle rejects and during the use of recycle rejects in order to establish the potential emissions of this pollutant. EPA RM 26 shall be used to conduct the tests in accordance with 40 CFR 60, Appendix A (July, 1991 version).

20. This permit supercedes all air permits issued by the Department.

21. An application for an operation permit must be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-208323
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

Issued this _____ day
of _____, 1992

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

Howard L. Rhodes, P.E.
Interim Director
Division of Air Resources
Management

ATTACHMENTS 1 - 6

Available Upon Request



Seminole Kraft Corporation

Jacksonville Mill

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

February 6, 1992

RECEIVED 9047516400

FEB 11 1992

Division of Air
Resources Management

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

Dear Mr. Fancy:

This is in further response to your letter of January 23, 1992 and our January 31, 1992 meeting regarding burning of recycled fiber rejects in our No.1 and No.2 Bark Boilers during the interim period prior to commencement of commercial operation of the AES/Cedar Bay Power Co-generation facility. As you know, Seminole Kraft will separately apply for construction permits to refurbish these boilers as new sources meeting all applicable PSD and new source requirements to allow operation of these refurbished boilers after AES/Cedar Bay commences commercial operation.

We appreciate the Department's clarification regarding what you intended to be considered RDF (Refuse-derived fuel). We now understand the Department believes that only the plastic component of the recycled fiber rejects should be considered RDF and that the remainder (wood fiber, including low levels of inorganic contaminants, sand, grit, etc.) are indeed carbonaceous fuel which these boilers are currently authorized to burn. Further, we understand that your January 23, 1992 letter simply asked that Seminole Kraft submit a permit application requesting a minor modification to the bark boiler permits to create a federally enforceable limit that would limit the plastic component of the total fuel feed to 30% on a dry weight, 24-hour (daily) basis.

While Seminole Kraft does not agree that this small amount of plastic contamination should be treated as RDF (and, hence, reserves its right to contest such a finding by the Department in the future), we have enclosed an application for each bark

Mr. Clair H. Fancy, P.E.
February 6, 1992
Page Two

boiler requesting that the Department modify our permits to create a federally enforceable permit limit restricting the plastic component of the total fuel feed to 30% on a dry weight, 24-hour (daily) basis. As the Department requested, nothing has been changed on these applications from the previous operating permit renewal except on the first and second pages where new signatures for the permittee and P.E. have been affixed. An application fee of \$250 per bark boiler is also attached.

Please let us know if you have any questions.

Sincerely,



L.A. Stanley
General Manager

ah

attachments

CC: Bruce Mitchell w/a
A. Kutyna/NE District, w/a
R. Roberson/AQD
G. Worley/EPA
G. Smallwood, Esq./DER
R. Donelan, Esq./DER
M. Riddle/SKC
C. Barton/SCC
T. Cole, Esq./OHF&C
D. Buff w/a

3319000

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

#250pd.
3-10-92
Regt. # 180741



AC16-208322

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [] New¹ [x] Existing¹

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

COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e., Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) No. 1 Bark Boiler

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.800 North 3365.575

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

APPLICANT NAME AND TITLE: L.A. Stanley, General Manager

APPLICANT ADDRESS: 9469 Eastport Road, P.O. Box 26998, Jacksonville, FL 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

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

I certify that the statements made in this application for a Operation 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: L.A. Stanley

L.A. Stanley, General Manager

Name and Title (Please Type)

Date: 2/7/92

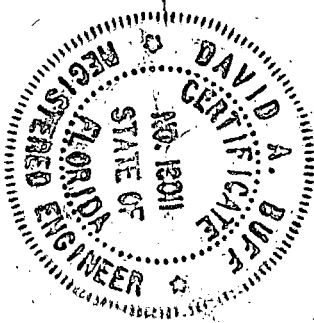
Telephone No. (904) 751-6400

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

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

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

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed David A. Buff

David A. Buff

Name (Please Type)

KBN Engineering and Applied Sciences, Inc.

Company Name (Please Type)

1034 Northwest 57th Street

Mailing Address (Please Type)

Florida Registration No. 19011 Date: 2/5/92 Telephone No. (904) 331-9000

SECTION II: GENERAL PROJECT INFORMATION

- A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Refer to cover letter

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

Start of Construction N/A Completion of Construction N/A

- 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.)

Wet scrubber already in place.

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

A016-32761 issued August 18, 1980 expired July 31, 1985.

A016-71204 issued August 8, 1983 transfer December 6, 1986 expired July 31, 1988.

A016-14235 issued November 9, 1988, expires May 31, 1993.

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52;
If power plant, hrs/yr _____; if seasonal, describe: _____

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

1. Is this source in a non-attainment area for a particular pollutant? _____
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. _____
3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. _____
4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? _____
5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? _____

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? Yes
- a. If yes, for what pollutants? Particulate and Visible Emissions
 - b. If yes, in addition to the information required in this form, any information
requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any
justification for any answer of "No" that might be considered questionable.
The source is in the area of influence of a particulate non-attainment zone.

The operation and maintenance plans as required by 17-2.650 (2) (g) is attached.

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

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

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ ^f Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
<i>Particulate Bark</i>	<i>Up to 38.6^c</i>	<i>74^d</i>	<i>0.2 lb/MMBtu^a</i>	<i>38.6^c</i>	<i>338,136</i>	<i>169</i>	<i>6</i>
<i>Particulate Fuel Oil</i>	<i>Up to 19.3^c</i>	<i>No Data</i>	<i>0.1 lb/MMBtu^a</i>	<i>19.3^c</i>	<i>169,068</i>	<i>84</i>	
<i>Visible Emissions</i>	<i>N/A</i>		<i>30% Capacity^a</i>	<i>N/A^c</i>	<i>N/A</i>		<i>6</i>
<i>SO₂</i>	<i>483^c</i>	<i>71^e</i>	<i>2.5 lb/MMBtu^b</i>	<i>482.5^c</i>	<i>4,266,700</i>	<i>2,113</i>	<i>6</i>

¹See Section V, Item 2.

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).

^a17-2.650 (2) (c) (3)

^b17-2.600 (6) (c)

^cCalculated from permit data

^d20.33 lb/hr x 305 days x 24h/day/2000 lb/ton = 74.41

^eAverage from 1983 to 1985 burning 2.27% Fuel Oil.

^fCalculate after control to permit limits.

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)
<i>Buell VT Cyclone Separator</i>	<i>Particulate</i>	<i>est. 80%</i>	<i>N/A</i>	<i>estimated</i>
<i>Ducon Venturi Scrubber type WO Contract #C-73-131</i>	<i>Particulate</i>	<i>est. 92%</i>	<i>N/A</i>	<i>estimated</i>

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
<i>Pulpwood Bark at Approx. 50% Moisture</i>	<i>24,883</i>	<i>36,915</i>	<i>193</i>
<i>Bunker C or No. 6 Fuel Oil</i>	<i>Varies from none to 1,050</i>	<i>1,287</i>	<i>193</i>

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

Fuel Analysis: *Fuel Oil*

Percent Sulfur: 2.27% Max. Percent Ash: 0.05 Typical

Density: 8.0 Typical lbs/gal Typical Percent Nitrogen: 0.3

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

BTU/gal

Other Fuel Contaminants (which may cause air pollution): Vanadium, Nickel, Sodium

F. If applicable, indicate the percent of fuel used for space heating. *N/A*

Annual Average _____ Maximum _____

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

The fly ash collected in the cyclones is sold or reinjected into the boiler. Sand screened from the bark is buried in the on-site landfill. The particulate collected in the scrubber liquid is sewered to the primary clarifier where it is dewatered with the primary sludge and landfilled on-site.

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

Stack Height: 136.3 ft. Stack Diameter: 8.0 ft.
 Gas Flow Rate: 143,580 ACFM 94,970 DSCFM Gas Exit Temperature: 148 °F.
 Water Vapor Content: 24 % Velocity: 47.6 FPS

SECTION IV: INCINERATOR INFORMATION N/A

Type of Waste	Type O (Plastics)	Type II (Rubbish)	Type III (Refuse)	Type IV (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control devices: ☐ Cyclone ☐ Wet Scrubber ☐ Afterburner
☐ Other (specify) _____

Brief description of operating characteristics of control devices: _____

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

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS N/A

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)]
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.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
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. 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).
6. An 8 ½" 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.
7. An 8 ½" 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 (Examples: Copy of relevant portion of USGS topographic map).
8. An 8 ½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY N/A

- A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

☐ Yes ☐ No

Contaminant	Rate or Concentration

- B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

☐ Yes ☐ No

Contaminant	Rate or Concentration

- C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

- D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height: ft.

b. Diameter ft.

c. Flow Rate: ACFM

d. Temperature: °F.

e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Devices:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION N/A

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? ☐ Yes ☐ No
- b. Was instrumentation calibrated in accordance with Department procedures?
☐ Yes ☐ No ☐ Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
2. Surface data obtained from (location) _____
3. Upper air (mixing height) data obtained from (location) _____
4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.
2. _____ Modified? If yes, attach description.
3. _____ Modified? If yes, attach description.
4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ₂	_____ grams/sec

E. Emission Data Used in Modeling

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

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

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e, jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



AC16-208323

#250 pd,
270-92
Rept. #180745

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [] New¹ [x] Existing¹

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

COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e., Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) No. 2 Bark Boiler

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.800 North 3365.575

Latitude 30 ° 25 ' 15 "N

Longitude 81 ° 36 ' 00 "W

APPLICANT NAME AND TITLE: L.A. Stanley, General Manager

APPLICANT ADDRESS: 9469 Eastport Road, P.O. Box 26998, Jacksonville, FL 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

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

I certify that the statements made in this application for a Operation 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: L.A. Stanley

L.A. Stanley, General Manager

Name and Title (Please Type)

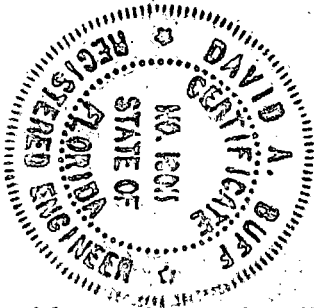
Date: 2/7/92 Telephone No. (904) 751-6400

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

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

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

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed David A. Buff

David A. Buff

Name (Please Type)

KBN Engineering and Applied Sciences, Inc.

Company Name (Please Type)

1034 Northwest 57th Street

Mailing Address (Please Type)

Florida Registration No. 19011 Date: 2/5/92 Telephone No. (904) 331-9000

SECTION II: GENERAL PROJECT INFORMATION

- A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Refer to cover letter

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

Start of Construction N/A Completion of Construction N/A

- 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.)

Wet scrubber already in place.

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

A016-32762 issued August 18, 1980 expired July 31, 1985.

A016-71205 issued August 8, 1983 transfer December 6, 1986 expired July 31, 1988.

A016-149236 issued November 9, 1988, expires May 1, 1993.

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52;
If power plant, hrs/yr _____; if seasonal, describe: _____

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

1. Is this source in a non-attainment area for a particular pollutant? _____
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. _____
3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. _____
4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? _____
5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? _____

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? Yes
- a. If yes, for what pollutants? Particulate and Visible Emissions
 - b. If yes, in addition to the information required in this form, any information
requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any
justification for any answer of "No" that might be considered questionable.

The source is in the area of influence of a particulate non-attainment zone.

The operation and maintenance plans as required by 17-2.650 (2) (g) is attached.

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

B. Process Rate, if applicable: (See Section V, Item 1) *N/A*

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ^{4 f} Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
<i>Particulate Bark</i>	<i>Up to 38.6^c</i>	<i>33.98^d</i>	<i>0.2 lb/MMBtu^a</i>	<i>38.6^c</i>	<i>338,136</i>	<i>169</i>	<i>6</i>
<i>Particulate Fuel Oil</i>	<i>Up to 19.3^c</i>	<i>No Data</i>	<i>0.1 lb/MMBtu^a</i>	<i>19.3^c</i>	<i>169,068</i>	<i>84</i>	<i>6</i>
<i>Visible Emissions</i>	<i>N/A</i>		<i>30% Capacity</i>	<i>N/A</i>	<i>N/A</i>		
<i>SO₂</i>	<i>483^c</i>	<i>78^e</i>	<i>2.5 lb/MMBtu^b</i>	<i>482.5^c</i>	<i>4,266,700</i>	<i>2,113</i>	<i>6</i>

¹See Section V, Item 2.

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).

^a17-2.650 (2) (c) (3)

^b17-2.600 (6) (c)

^cCalculated from permit data

^d9.6 lb/hr x 295 days x 24h/day/2000 lb/ton = 33.98 (1987)

^eAverage from 1983 to 1985 for 2.27% Fuel Oil.

^fCalculate after control to permit limits.

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)
<i>Barron Base III 14k35-100 6 AV Mechanical collector</i>	<i>Particulate</i>	<i>est. 80%</i>	<i>N/A</i>	<i>estimate</i>
<i>Ducon (type VV0) Venturi Scrubber</i>	<i>Particulate</i>	<i>est. 92%</i>	<i>N/A</i>	<i>estimate</i>

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
<i>Pulpwood Bark at Approx. 50% Moisture</i>	<i>23,883</i>	<i>36,915</i>	<i>193</i>
<i>Bunker C or No. 6 Fuel Oil</i>	<i>Varies from none to 1,050</i>	<i>1,286</i>	<i>193</i>

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

Fuel Analysis: *Fuel Oil*

Percent Sulfur: 2.27% Max. Percent Ash: 0.05 Typical

Density: 8.0 Typical lbs/gal Typical Percent Nitrogen: 0.3

Heat Capacity: 18,751 Typical BTU/lb 150,000 BTU/gal

Other Fuel Contaminants (which may cause air pollution): Vanadium, Nickel, Sodium

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

Annual Average _____ Maximum _____

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

Fly collected in the mechanical collectors is either sold or reinjected into the boiler.
Sand is screened from the bark and landfilled on-site. The particulate collected in the
scrubber water is sewered to the primary clarifier where it is dewatered with the primary
sludge and landfilled on-site.

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

Stack Height: 136.3 ft. Stack Diameter: 8.0 ft.
 Gas Flow Rate: 115,780 ACFM 83,880 DSCFM Gas Exit Temperature: 142 °F.
 Water Vapor Content: 18 % Velocity: 38.4 FPS

SECTION IV: INCINERATOR INFORMATION N/A

Type of Waste	Type O (Plastics)	Type II (Rubbish)	Type III (Refuse)	Type IV (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control devices: ☐ Cyclone ☐ Wet Scrubber ☐ Afterburner
☐ Other (specify) _____

Brief description of operating characteristics of control devices: _____

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

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS N/A

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)]
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.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
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. 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).
6. An 8 ½" 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.
7. An 8 ½" 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 (Examples: Copy of relevant portion of USGS topographic map).
8. An 8 ½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY N/A

- A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

☐ Yes ☐ No

Contaminant	Rate or Concentration

- B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

☐ Yes ☐ No

Contaminant	Rate or Concentration

- C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

- D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height: ft.

b. Diameter ft.

c. Flow Rate: ACFM

d. Temperature: °F.

e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Devices:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION N/A

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO²* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? ☐ Yes ☐ No
- b. Was instrumentation calibrated in accordance with Department procedures?
☐ Yes ☐ No ☐ Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
2. Surface data obtained from (location) _____
3. Upper air (mixing height) data obtained from (location) _____
4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.
2. _____ Modified? If yes, attach description.
3. _____ Modified? If yes, attach description.
4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ²	_____ grams/sec

E. Emission Data Used in Modeling

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

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

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e, jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

FEB 25 1991

4APT-AE

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Division of Air Resources Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED
MAR 13 1991
DER-BAQM

Dear Mr. Fancy:

As requested in your November 16, 1990, letter, we have reviewed the analysis by Mr. Terry Cole of Oertel, Hoffman, Fernandez and Cole, P.A., regarding the applicability of NSPS and PSD to the boilers at Seminole Kraft and AES Cedar Bay (AESC B) in Jacksonville, Florida. In Mr. Cole's letter, two specific situations involving the boilers at Seminole Kraft and the AESCB project were addressed.

APPLICABILITY OF NSPS AND PSD IF AESCB/SEMINOLE KRAFT PROJECT IS CERTIFIED

Under the conditions of certification for the AESCB project, the shutdown of boilers at Seminole Kraft is required in order to provide offsets for increases in pollutants from the cogeneration facility. It must be noted that for the emissions reductions to be creditable, they must be permanent. After the PSD permit is issued which incorporates these shutdowns and makes them federally enforceable, there will be no additional emissions reduction credit available from the shutdown of these boilers. Should Seminole Kraft decide to refurbish the dismantled bark boilers, the boilers would be treated as entirely new emissions units with none of the exemptions from applicability for existing units that are specified under PSD regulations being available.

With regard to NSPS, the existing boilers at Seminole Kraft would not become subject to NSPS if they remained intact and were merely restarted, without any physical or operational change.

If the boilers are dismantled in any fashion (i.e. key components removed) and the decision is later made to restart the boilers, then NSPS would apply. This is due to the fact that there would be an emission increase caused by a physical change to the boilers. Since the boilers were incapable of operating, the emissions would be zero immediately before the changes necessary for a restart and therefore, an emissions increase would have resulted thus triggering NSPS. This is consistent with the Wisconsin Electric Power Company decision. If changes are only necessary to accommodate a different fuel mix, then we would accept emission data just prior to the shutdown and compare with data after start up to determine if an emissions increase, and hence a modification, would result thus triggering NSPS. Furthermore, the composition of the fiber rejects would need to be evaluated to determine if the new combination of fuel would be classified as municipal solid waste (MSW). If so, then the newly promulgated NSPS regulations for municipal waste combustors would apply.

APPLICABILITY OF NSPS AND PSD IF AESCB/SEMINOLE KRAFT PROJECT IS NOT CERTIFIED

According to Mr. Cole, the bark boilers would not be subject to NSPS or PSD permit review when the fuel mixture for the bark boilers is changed from 100% bark to 75% bark/25% fiber reject mix. The basis for this determination is that the bark boilers were capable of firing the fiber rejects at the percentages anticipated as of January 6, 1975.

In order to determine the applicability of NSPS to the bark boilers due to the change in fuel type it must be ascertained if the bark boilers will have an increase in the emission rate, expressed as kilograms per hour, of a regulated pollutant and if the bark boilers could fire the fiber rejects as originally constructed. However, not enough information was provided to determine if an emission rate increase in a regulated pollutant would occur, therefore, we will assume that an increase in a regulated pollutant will occur.

Assuming that an increase will occur, then the second condition must be addressed. It is incorrect to use January 6, 1975, as the date to determine if the bark boilers were originally designed to burn the bark and fiber rejects simultaneously. The exemption to the modification provision at §60.14(e)(4) essentially states that if the existing facility could have fired the alternative fuel prior to the applicability date of

the NSPS Subpart, then the increase in the emission rate of a regulated pollutant due to the use of the alternative fuel would not be considered a modification as defined in §60.14. Since Mr. Cole indicated that on January 6, 1975, the bark boilers were capable of firing the 75% bark/25% fiber rejects mixture, the only possible applicable NSPS Subparts are Subparts D and E. If the bark boilers were capable of firing the alternative fuel prior to August 17, 1971, then neither Subpart would apply.

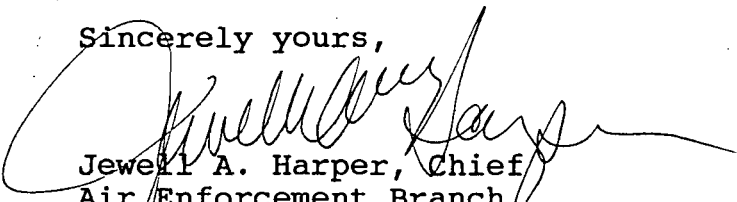
If the bark boilers were not capable of firing the alternative fuel prior to August 17, 1971, then they could be subject to either Subparts D or E or both if an increase in the emission rate of a regulated pollutant occurs. In addition, in order for Subpart E to apply, the combination of bark and fiber rejects would have to be determined to be MSW.

In addition, if the combination of bark and fiber rejects is considered to be MSW, then the bark boilers would be subject to emission standards for existing MSW combustors which will be established in accordance with the guidelines published in the February 11, 1991, Federal Register.

With regard to PSD, since the bark boilers were capable of firing bark and fiber refuse prior to January 6, 1975, then PSD review would not be required.

If you have any questions regarding this letter, please contact Mr. Brian Beals at 404/347-2904.

Sincerely yours,



Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division