

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. T. Frank Lee
Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218-0998

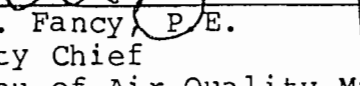
April 4, 1988

Enclosed are permits Nos. AC 16-141794, -141795, -141796, for Seminole Kraft Corporation to install/construct new Munters T-271 chevron plate type mist eliminators with dual direction spray nozzles mounted underneath the mist eliminators on the existing Nos. 1, 2 and 3 Smelt Dissolving Tanks. The installation/construction will take place at the company's location in Jacksonville, Duval County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copy furnished to:

K. Mehta, BESD
C. Barton, SKC
J. McKinnon, P.E., SKC
B. Pittman, Esq.

Final Determination

Seminole Kraft Corporation
Duval County
Jacksonville, Florida

Construction Permit Nos. AC 16-141794
AC 16-141795
AC 16-141796

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

March 28, 1988

Final Determination

The construction permit applications have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Jacksonville Journal on March 10, 1988. The Technical Evaluation and Preliminary Determination (TE & PD) and draft construction permits were available for public inspection at the Duval County's Bio-Environmental Services Division (BESD) office in Jacksonville and the DER's Bureau of Air Quality Management (BAQM) office in Tallahassee.

Comments were received from Mr. Jerry E. Woosley, Associate Engineer with the BESD office, on February 22, 1988, and Mr. Curtis Barton, Manager of Environmental Affairs with the Seminole Kraft Corporation - Jacksonville mill (SKC), on February 26, 1988. The Bureau's responses to their comments will follow:

A. Mr. Jerry E. Woosley's comments:

Mr. Woosley's comments were a follow-up to a phone conversation with Mr. Bruce Mitchell, review engineer with the BAQM, on February 11, 1988, and the comments were incorporated into the TE & PD and draft construction permits prior to sending the package out for public notice.

B. Mr. Curtis Barton's comments:

Mr. Barton's comments were a follow-up to a meeting held on February 24, 1988, with representatives of the Bureau at the BAQM office, for the purpose of confirming agreements reached. The Bureau's responses will address each comment in the same sequence as they are numbered and will apply generically to the construction permits, Nos. AC 16-141794, -141795 and -141796:

1. No response necessary.
2. No response necessary.
3. No response necessary.
4. The Bureau agrees with the comment and the following will be changed:

Specific Condition No. 8:

From: The permittee shall provide proof of compliance in accordance with the Consent Order, OGC Case No. 86-1405, dated October 28, 1986, by May 12, 1988, to the BESD office.

To: The permittee shall be in final compliance in accordance with the Consent Order, OGC Case 86-1405, dated October 28, 1986, by May 12, 1988, and will provide proof of final compliance to the BESD office by June 26, 1988.

5. No response necessary
6. The Bureau agrees with the comment and the following will be changed:

Specific Condition No. 13, 2nd Paragraph:

From: If the construction permit expires prior to the permittee obtaining a permit to operate, then all activities at the project must cease. (FAC Rule 17-4)

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

7. The Bureau agrees with the request to change the expiration date:

From: August 10, 1988

To: January 1, 1989

8. No response necessary.

Attachments to be Incorporated:

8. Mr. Jerry E. Woosley's letter dated February 17, 1988, and received February 22, 1988.
9. Mr. Curtis Barton's letter dated February 25, 1988, and received February 26, 1988.

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



FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared Bill Champion

who on oath says that he is

Retail Advertising Supervisor of The Florida Times-Union, and

Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,

Florida; that the attached copy of advertisement, being a

Legal Notice

in the matter of Notice of Intent

in the Court,

was published in The Jacksonville Journal

in the issues of March 10, 1988

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me this 10th day of

March, A.D. 1988

Notary Public, State of Florida at Large.

My Commission Expires

Bill Champion

State of Florida Department of Environmental Regulation Notice of Intent The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Seminole Kraft Corporation to construct/install new Munters T-271 chevron plate type mist eliminators with dual direction spray nozzles mounted underneath the mist eliminators on the existing Nos. 1, 2 and 3 Smelt Dissolving Tanks. The project will be located at Seminole Kraft Corporation's existing facility in Jacksonville, Duval County, Florida. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination. Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes. 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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned to the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes. The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays at: Dept. of Environmental Regulation Bureau of Air Quality Management 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Dept. of Health, Welfare and Bio-Environmental Services Division 515 West 6th Street Jacksonville, Florida 32206-4397 Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

RECEIVED

MAR 17 1988

DER - BAWA

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 16-141794
Expiration Date: January 1, 1989
County: Duval
Latitude/Longitude: 30° 25' 15"N/
81° 36' 00" W
Project: No. 1 Smelt Dissolving
Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the installation of a new Munters T-271 chevron plate type mist eliminator with dual direction spray nozzles mounted underneath the mist eliminator on the No. 1 Smelt Dissolving Tank (SDT). The location of the project will be at the Seminole Kraft Corporation's existing facility in Jacksonville, Duval County, Florida. The UTM Coordinates are Zone 17, 744.18 km East and 3365.60 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Smelt Dissolving Tank 3-07-001-05

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

ATTACHMENTS

AC 16-141794

Attachments to be Incorporated:

1. Seminole Kraft's application package received November 12, 1987.
2. BESD's letter requesting additional information received December 10, 1987.
3. DER's incompleteness letter dated December 11, 1987.
4. NE District office's letter received January 4, 1988.
5. Seminole Kraft's response received January 26, 1988.
6. EPA's letter on NSPS guidelines dated October 23, 1987.
7. Technical Evaluation and Preliminary Determination dated February 12, 1988.
8. Mr. Jerry E. Woosley's letter dated February 17, 1988, and received February 22, 1988.
9. Mr. Curtis Barton's letter dated February 25, 1988, and received February 26, 1988.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141794
Expiration Date: January 1, 1989

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141794
Expiration Date: January 1, 1989

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141794
Expiration Date: January 1, 1989

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141794
Expiration Date: January 1, 1989

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The smelt dissolving tank (SDT) may operate continuously (i.e., 8760 hrs/yr).

2. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H₂S) shall not exceed 0.048 pound per 3000 pounds black liquor solids (0.82 lb/hr or 3.6 tons/yr and based on a projected maximum processing capacity of 51,500 lbs/hr black liquor solids (BLS) in the No. 1 recovery boiler (RB) - equivalent to 27,000 lbs/hr green liquor solids (GLS)).

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141794
Expiration Date: January 1, 1989

SPECIFIC CONDITIONS:

3. Based on the final compliance test results and their evaluations, this permit may be amended to reflect the actual maximum processing capacity of raw materials and chemicals of the SDT and its associated RB. Also, since the SDT's TRS emission limiting standard is based on the RB's processing capacity of BLS, a change in the PSD associated TRS allowable emission limits may be required (lbs/hr, TPY). The particulate matter (PM) mass allowable emission limits will change if the SDT's actual processing capacity is less than the capacity that its emission limits are based, which is 22,700 lbs/hr GLS.

4. The maximum PM mass allowable emissions shall not exceed 16.2 lbs/hr or 71 TPY, based on the permittee's request which is more stringent than applicable emission limiting standards and is acceptable to the DER's Bureau of Air Quality Management (BAQM) and the Duval County's Bio-Environmental Services Division (BESD).

5. Visible emissions shall not exceed 10% opacity in accordance with Florida Administrative Code (FAC) Rule 17-2.650(2)(c)10.b.

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

7. Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700.

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

8. The permittee shall be in final compliance in accordance with the Consent Order, OGC Case No. 86-1405, dated October 28, 1986, by May 12, 1988, and will provide proof of final compliance to the BESD office by June 26, 1988.

9. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141794
Expiration Date: January 1, 1989

SPECIFIC CONDITIONS:

10. Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the SDT is subject to the provisions of FAC Rules 17-2.710(3)(d), Establishing Specific Surrogate Parameters, and 17-2.710(4), Quarterly Reporting Requirements. The SDT is subject to the provisions of FAC Rule 17-4.140, Reports.

11. The SDT is subject to the provisions of FAC Rules 17-2.240, Circumvention, and 17-2.250, Excess Emissions. The SDT is subject to the provisions of FAC Rule 17-4.130, Plant Operation-Problems.

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

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

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

14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours shall be submitted for approval to the BAQM office and the BESD office.

Issued this 30 day of March,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 16-141795
Expiration Date: January 1, 1989
County: Duval
Latitude/Longitude: 30° 25' 15"N/
81° 36' 00" W
Project: No. 2 Smelt Dissolving
Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the installation of a new Munters T-271 chevron plate type mist eliminator with dual direction spray nozzles mounted underneath the mist eliminator on the No. 2 Smelt Dissolving Tank (SDT). The location of the project will be at the Seminole Kraft Corporation's existing facility in Jacksonville, Duval County, Florida. The UTM Coordinates are Zone 17, 744.18 km East and 3365.60 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Smelt Dissolving Tank '3-07-001-05

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

ATTACHMENTS

AC 16-141795

Attachments to be Incorporated:

1. Seminole Kraft's application package received November 12, 1987.
2. BESD's letter requesting additional information received December 10, 1987.
3. DER's incompleteness letter dated December 11, 1987.
4. NE District office's letter received January 4, 1988.
5. Seminole Kraft's response received January 26, 1988.
6. EPA's letter on NSPS guidelines dated October 23, 1987.
7. Technical Evaluation and Preliminary Determination dated February 12, 1988.
8. Mr. Jerry E. Woosley's letter dated February 17, 1988, and received February 22, 1988.
9. Mr. Curtis Barton's letter dated February 25, 1988, and received February 26, 1988.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141795
Expiration Date: January 1, 1989

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141795
Expiration Date: January 1, 1989

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141795
Expiration Date: January 1, 1989

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141795
Expiration Date: January 1, 1989

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The smelt dissolving tank (SDT) may operate continuously (i.e., 8760 hrs/yr).

2. Total reduced sulfur emissions (TRS) as hydrogen sulfide (H₂S) shall not exceed 0.048 pound per 3000 pounds black liquor solids (1.05 lbs/hr or 4.6 tons/yr and based on a projected maximum processing capacity of 65,900 lbs/hr black liquor solids (BLS) in the No. 2 recovery boiler (RB) - equivalent to 34,532 lbs/hr green liquor solids (GLS)).

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141795
Expiration Date: January 1, 1989

SPECIFIC CONDITIONS:

3. Based on the final compliance test results and their evaluations, this permit may be amended to reflect the actual maximum processing capacity of raw materials and chemicals of the SDT and its associated RB. Also, since the SDT's TRS emission limiting standard is based on the RB's processing capacity of BLS, a change in the PSD associated TRS allowable emission limits may be required (lbs/hr, TPY). The particulate matter (PM) mass allowable emission limits will change if the SDT's actual processing capacity is less than the capacity that its emission limits are based, which is 29,040 lbs/hr GLS.

4. The maximum PM mass allowable emissions shall not exceed 18.9 lbs/hr or 83 TPY, based on the permittee's request which is more stringent than applicable emission limiting standards and is acceptable to the DER's Bureau of Air Quality Management (BAQM) and the Duval County's Bio-Environmental Services Division (BESD).

5. Visible emissions shall not exceed 10% opacity in accordance with Florida Administrative Code (FAC) Rule 17-2.650(2)(c)10.b.

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

7. Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700.

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

8. The permittee shall be in final compliance in accordance with the Consent Order, OGC Case No. 86-1405, dated October 28, 1986, by May 12, 1988, and will provide proof of final compliance to the BESD office by June 26, 1988.

9. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141795
Expiration Date: January 1, 1989

SPECIFIC CONDITIONS:

10. Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the SDT is subject to the provisions of FAC Rules 17-2.710(3)(d), Establishing Specific Surrogate Parameters, and 17-2.710(4), Quarterly Reporting Requirements. The SDT is subject to the provisions of FAC Rule 17-4.140, Reports.

11. The SDT is subject to the provisions of FAC Rules 17-2.240, Circumvention, and 17-2.250, Excess Emissions. The SDT is subject to the provisions of FAC Rule 17-4.130, Plant Operation-Problems.

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

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

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

14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours shall be submitted for approval to the BAQM office and the BESD office.

Issued this 30 day of March,
1988.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 16-141796
Expiration Date: January 1, 1989
County: Duval
Latitude/Longitude: 30° 25' 15"N/
81° 36' 00" W
Project: No. 3 Smelt Dissolving
Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the installation of a new Munters T-271 chevron plate type mist eliminator with dual direction spray nozzles mounted underneath the mist eliminator on the No. 3 Smelt Dissolving Tank (SDT). The location of the project will be at the Seminole Kraft Corporation's existing facility in Jacksonville, Duval County, Florida. The UTM Coordinates are Zone 17, 744.18 km East and 3365.60 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Smelt Dissolving Tank 3-07-001-05

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

ATTACHMENTS

AC 16-141796

Attachments to be Incorporated:

1. Seminole Kraft's application package received November 12, 1987.
2. BESD's letter requesting additional information received December 10, 1987.
3. DER's incompleteness letter dated December 11, 1987.
4. NE District office's letter received January 4, 1988.
5. Seminole Kraft's response received January 26, 1988.
6. EPA's letter on NSPS guidelines dated October 23, 1987.
7. Technical Evaluation and Preliminary Determination dated February 12, 1988.
8. Mr. Jerry E. Woosley's letter dated February 17, 1988, and received February 22, 1988.
9. Mr. Curtis Barton's letter dated February 25, 1988, and received February 26, 1988.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: January 1, 1989

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: January 1, 1989

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Seminole Kraft Corporation

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PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: January 1, 1989

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PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: January 1, 1989

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5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: January 1, 1989

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: January 1, 1989

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: January 1, 1989

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The smelt dissolving tank (SDT) may operate continuously (i.e., 8760 hrs/yr).

2. Total reduced sulfur emissions (TRS) as hydrogen sulfide (H₂S) shall not exceed 0.048 pound per 3000 pounds black liquor solids (1.05 lbs/hr or 4.6 tons/yr and based on a projected maximum processing capacity of 65,900 lbs/hr black liquor solids (BLS) in the No. 3 recovery boiler (RB) - equivalent to 34,532 lbs/hr green liquor solids (GLS)).

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: January 1, 1989

SPECIFIC CONDITIONS:

3. Based on the final compliance test results and their evaluations, this permit may be amended to reflect the actual maximum processing capacity of raw materials and chemicals of the SDT and its associated RB. Also, since the SDT's TRS emission limiting standard is based on the RB's processing capacity of BLS, a change in the PSD associated TRS allowable emission limits may be required (lbs/hr, TPY). The particulate matter (PM) mass allowable emission limits will change if the SDT's actual processing capacity is less than the capacity that its emission limits are based, which is 29,040 lbs/hr GLS.

4. The maximum PM mass allowable emissions shall not exceed 18.9 lbs/hr or 83 TPY, based on the permittee's request which is more stringent than applicable emission limiting standards and is acceptable to the DER's Bureau of Air Quality Management (BAQM) and the Duval County's Bio-Environmental Services Division (BESD).

5. Visible emissions shall not exceed 10% opacity in accordance with Florida Administrative Code (FAC) Rule 17-2.650(2)(c)10.b.

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

7. Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700.

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

8. The permittee shall be in final compliance in accordance with the Consent Order, OGC Case No. 86-1405, dated October 28, 1986, by May 12, 1988, and will provide proof of final compliance to the BESD office by June 26, 1988.

9. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: January 1, 1989

SPECIFIC CONDITIONS:

10. Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the SDT is subject to the provisions of FAC Rules 17-2.710(3)(d), Establishing Specific Surrogate Parameters, and 17-2.710(4), Quarterly Reporting Requirements. The SDT is subject to the provisions of FAC Rule 17-4.140, Reports.

11. The SDT is subject to the provisions of FAC Rules 17-2.240, Circumvention, and 17-2.250, Excess Emissions. The SDT is subject to the provisions of FAC Rule 17-4.130, Plant Operation-Problems.

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

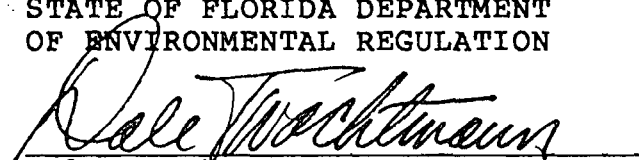
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If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease. (FAC Rule 17-4)

14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours shall be submitted for approval to the BAQM office and the BESD office.

Issued this 30 day of March,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary

ATTACHMENT 8

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division
Air and Water Pollution Control

February 17, 1988



DER
FEB 22, 1988
3AQM

Mr. Clair Fancy, P.E.
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Re: **Seminole Kraft Corporation**
Smelt Dissolving Tank Nos. 1, 2, and 3
Technical Evaluation and Preliminary Determination
AC No - 141794; AC 16-141795; AC 16-141796

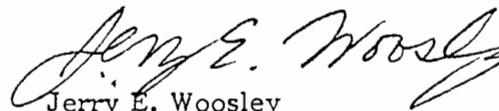
Dear Mr. Fancy:

As a follow-up to my phone conversation with Mr. Bruce Mitchell on February 11, 1988, Bio-Environmental Services Division (BESD) provides the following comments on the captioned item:

1. It should be specified that the process weight used for calculating the allowable particulate matter emissions (if applicable) should be specified as the green liquor solids rate from the smelt dissolving tank(s). This should be on a dry basis.
2. The TRS specific surrogate monitoring parameters required by Rule 17-2.710(3)(d), Florida Administrative Code (FAC), should be submitted with the operating permit application.

If BESD may be of further assistance in this matter, please advise.

Very truly yours,


Jerry E. Woosley
Associate Engineer

JEW/bgm

cc: Mr. Bill Stewart, P.E., DER
BESD Air Permitting File
BESD File 2155

Disc: 3, 24 ~~Tom Rogers~~
Max Linn

Copied: Bruce Mitchell }
Pradheep Ravul } 2.22.88 (m)
CHF/BT }



ATTACHMENT 9



Seminole Kraft Corporation

Jacksonville Mill

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

February 25, 1988

904 751-6400

RECEIVED

FEB 26 1988 *ms*

FOR - BAQM

Mr. Clair Fancy, P.E.
Deputy Bureau Chief
Florida DER
2600 Blair Stone Road
Tallahassee, FL 32301

Dear Mr. Fancy:

The purpose of this letter is to confirm the agreements reached with your staff during a meeting held at your office on February 24, 1988. The meeting was attended by:

Mr. Bill A. Thomas
Mr. Bruce Mitchell
Mr. Pradeep A. Raval
Ms. Teresa Heron
Mr. Curt Barton
Mr. John Millican

The meeting was held to discuss proposed conditions for the following permits:

- No.1 Smelt Dissolving Tank - AC16-141794
- No.2 Smelt Dissolving Tank - AC16-141795
- No.3 Smelt Dissolving Tank - AC16-141796

The meeting was very constructive and was conducted in a mutually cooperative manner. We appreciate this very much.

Mr. Clair Fancy, P.E.
February 25, 1988
Page 2

Based on our understanding, the agreements reached at the meeting which pertain to all three permits are as follows:

1. Specific conditions 1,2,3,4,6,9,11 and 12 are all mutually acceptable as written.
2. Specific conditions No.5 and 7b relate to the visible emissions limit of 10% opacity. We agreed at the meeting that these conditions are in accordance with the existing regulations. We also agreed that pending rule development probably will modify the existing visible emissions regulations. When this occurs, we agreed that these permit conditions would be modified accordingly.
3. Specific condition No.7 a and c are acceptable as written.
4. Specific condition No.8 - We agreed to modify this condition to read as follows:

"The permittee shall be in final compliance in accordance with the Consent Order, OGC Case No. 86-1405, dated October 28, 1986, by May 12, 1988, and will provide proof of final compliance to the BESD office by June 26, 1988."

5. Specific condition No.10 - We agreed the existing regulations require quarterly reporting. We also agreed that the existing rule is under review within DER and may be modified. We agreed this condition could be modified at a later date to conform with any modification to these reporting requirements.
6. Specific condition No.13 - We agreed that with a construction permit expiration date of January 1, 1989, the first paragraph of this condition is acceptable as written. The second paragraph should be altered to read:

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

Mr. Clair Fancy, P.E.
February 25, 1988
Page 3

7. We agreed that the construction permit expiration date would be January 1, 1989.
8. We agreed that the Notice of Intent could be published in the newspaper as currently written and Seminole Kraft will proceed with such publication.

It appears that all of the objectives of both parties were satisfied and the meeting was very satisfactory.

At the close of this meeting Ms. Teresa Heron reported that the construction permit for our new slaker was in typing and the intent to issue would be circulated this week. This is very expeditious processing of a critical permit and we greatly appreciate this.

Again, we appreciate the counsel and cooperation from your staff in negotiating these permits to resolution.

Sincerely,



Curtis Barton
Manager Environmental Affairs

ah

CC: Mr. Frank Lee
Mr. Malcolm Williams
Mr. Mike Riddle
Mr. Jerry Woosley
Mr. Ernie Frey