

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

Article Addressed to:

L.A. Stanley, Gen. Mgr.
Seminole Kraft Corp.
7469 Eastport Rd
Jacksonville, FL 32229

Type of Service:	Article Number
<input checked="" type="checkbox"/> Registered	P 062 921 884
<input type="checkbox"/> Insured	
<input checked="" type="checkbox"/> Certified	
<input type="checkbox"/> COD	
<input type="checkbox"/> Express Mail	

Always obtain signature of addressee or agent and **DATE DELIVERED.**

Signature - Addressee

Signature - Agent

Date of Delivery

Addressee's Address (ONLY if requested and fee paid)

P 062 921 884



Receipt for Certified Mail

No Insurance Coverage Provided
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Sent to	L.A. Stanley
Street and No.	Seminole Kraft
P.O., State and ZIP Code	Jax, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom, Date, and Addressee's Address	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	9-2-92
	AC 16-208322
	" " 323

PS Form 3800, June 1991

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

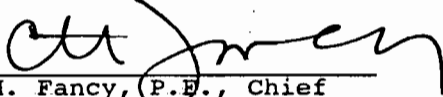
Mr. L. A. Stanley
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, FL 32229

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 I. 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 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. 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).

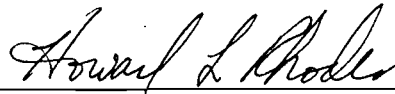
PERMITTEE:
Seminole Kraft Corporation

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




State of Florida
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: August 31, 1992

SUBJ: Approval of Construction Permits Nos. AC 16-208322
AC 16-208323

Seminole Kraft Corporation
Duval County

Attached for your approval and signature are construction permits prepared by the Bureau of Air Regulation for the above referenced company to modify the existing Nos. 1 and 2 Bark Boilers. As you may recall, these were the subject of a meeting with the Secretary as these sources were considered, at one time, to be related to the AES/Cedar Bay project. Seminole Kraft gave us a waiver until June 30 to sort out the AES-Seminole Kraft situation. The Intent was sent out on June 25.

During the public notice period and on July 15, a petition for a formal hearing, pursuant to Section 120.57, Florida Statutes, was filed with the Department's OGC. On August 15, 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.

Since the mill is changing to 100% recycle fiber from pulping, the proposed modification will allow the combustion of the recycle fiber rejects and the fiber bale's plastic wrapping and strapping. The two bark boilers are currently permitted to fire bark and/or fuel oil to produce steam. The facility is located in Jacksonville, Duval County, Florida.

I recommend your approval and signature.

CHF/BM/rbm

Attachments

TO: Howard L. Rhodes
FROM: Clair Fancy
DATE: August 31, 1992
SUBJ: Approval of Construction Permits Nos. AC 16-208322
AC 16-208323
Seminole Kraft Corporation
Duval County

Attached for your approval and signature are construction permits prepared by the Bureau of Air Regulation for the above referenced company to modify the existing Nos. 1 and 2 Bark Boilers. As you may recall, these were the subject of a meeting with the Secretary as these sources were considered, at one time, to be related to the AES/Cedar Bay project. Seminole Kraft gave us a waiver until June 30 to sort out the AES-Seminole Kraft situation. The Intent was sent out on June 25.

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I recommend your approval and signature.

CHF/BM/rbm

Attachments

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

ATTORNEYS AT LAW

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

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

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

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

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

October 6, 1992

RECEIVED
BY HAND DELIVERY
OCT 6 1992
Bureau of
Air Regulation

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

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

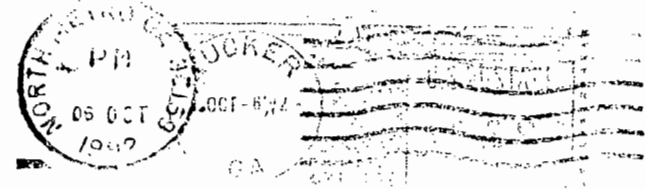
A. Robinson, No Dist
Terry\Seminole\Fancy.105
R. Robinson, DEARD



Stone Container Corporation

Containerboard and Paper Division

1979 Lakeside Parkway
Suite 300
Tucker, GA 30084



AD DENNIS Jaber

State of Florida
Dept. of Environmental Regulation
Twin Towers Ofc. Bldg.
2600 Blair Stone Rd
Tallahassee, FL 32399-2400



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400
ADDRESS CORRECTION REQUESTED



Stone Container

~~Curt Barton~~
Seminole Kraft Corp
2150 Parklake Dr-Suite 400
Atlanta, GA 30345

29/10/01 24054530E STON150
NOTIFY SENDER OF NEW ADDRESS
STONE CONTAINER CORP
1979 LAKESIDE PKY STE
TUCKER GA 30084-5847



MOVING ANNOUNCEMENT.....Effective July 27, 1992



Stone Container Corporation

Technology and Engineering

Mill Operations

Corrugated Container Division Regional Office

to

1979 Lakeside Parkway - Suite 300

Tucker, Georgia 30084

Telephone (404) 621-6700

Our individual phone and fax numbers will remain the same



Seminole Kraft Corporation

Jacksonville Mill

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

September 1, 1992

904 751-6400

Mr. C.H. Fancy, Chief
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

Attached are copies of the operating permits surrendered to Mr. Ernest Frey at your district office in Jacksonville; and recent and recent emissions test data for the Seminole Kraft Recovery Boilers, Smelt Tanks, Lime Kiln and Slaker. These units were permanently shut down on September 10 1992. Table I summarizes the emission type and quantity from each source.

We are requesting that these creditable emissions reductions (Table I and Table II) be credited to Seminole Kraft for a period of five years commencing September 10, 1992 and ending September 10, 1997. Preservation of these reductions are described in letters from yourself to L.A. Stanley (Seminole Kraft, General Manager) and from Jewell Harper (EPA Air Enforcement Branch Chief) to you (See attachment I and II). We would appreciate a written response from you acknowledging the allocation of these creditable emission reductions to Seminole Kraft.

Should you have any questions, please contact Mike Riddle (Technical Director, Seminole Kraft) at (904) 751-6400, ext. 252.

Sincerely,

L.A. Stanley
General Manager

ah
attachments

CC: Wayne Walker (RESO)
Ernest Frey (FDER, Jacksonville Office)
Mike Riddle
Joe Eskridge
Curt Barton
Terry Cole
Craig Hurd

RECEIVED

SEP 23 1992

Division of Air
Resources Management

9-24-92
2:31:18 pm

Spoke w/ Mike Riddle
and requested the data to
substantiate the data
in Tables I & II.

BR

9-24-92

Spoke w/ Buck Owen - he
said that the 3XPBs and
2 x BBs were the only
sources evaluated for
conting. emissions in
the AES-Cedar Bay project.

BR

P.S. ✓ the permitted but
not constructed R3/SOT
for conting. emissions

TABLE I - AVERAGE TONS/YEAR
1990 - 1991 DATA

	Carbon Monoxide (CO)	Particulate Matter (PM)	Sulfur Dioxide (SO ₂)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Total Reduced Sulfur (TRS)	Sulfuric Acid (H ₂ SO ₄)
Recovery Boiler 1	1141	108	4	120	114	7	10
Recovery Boiler 2	1173	156	3	129	193	12	20
Recovery Boiler 3	481	130	1	143	38	14	14
Lime Kiln 1	1a	4	-	7	2b	-	-
Lime Kiln 2	11a	22	9	41	19b	2	-
Lime Kiln 3	10a	20	9	60	19b	1	-
Smelt Dissolving Tank 1	-	23	2a	-	-	1	-
Smelt Dissolving Tank 2	-	24	3a	-	-	2	-
Smelt Dissolving Tank 3	-	37	3a	-	-	2	-
Slaker 3	-	1	-	-	-	-	-
TOTAL	2817	525	34	500	385	41	44

a = AP-42 factors used due to lack of actual data

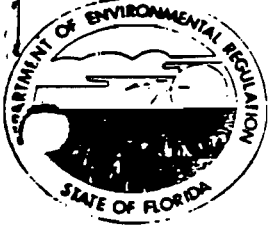
b = NCASI information used due to lack of actual data

TABLE II
HEAVY METALS

JANUARY 6-13, 1992

LBS/YR

BARIUM	9
CHROMIUM	20
COPPER	14
MANGANESE	65
MERCURY	4
NICKEL	11
PHOSPHORUS	255
SILVER	5
ZINC	296



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 6, 1990

*cc: M. Liddle
C. Barton
J. Cole*

RECEIVED

JUN 11 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. L. A. Stanley
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218-0998

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

Dear Mr. Stanley:

Re: Contemporaneous Emissions Credit Calculations

The Department and the U.S. EPA - Region IV have reviewed your letter with attachments dated February 16, 1990. A letter of response, which is attached, was received from Ms. Jewell A. Harper, Chief of the Air Enforcement Branch, U.S. EPA-Region IV, posing a concern about the calculation of contemporaneous emissions credit. Specifically, contemporaneous emissions shall be based on actual emissions data established by conducting emissions tests and on actual operating data (hours per year) from the two years previous to shutdown, unless another time period within the last 5 years prior to shutdown is more representative of actual operating conditions. The Department concurs with EPA on this issue since this is the guidelines established in both the federal and state regulations.

Because Seminole Kraft Corporation (SKC) has indicated that the mill might be going to 100% recycled fiber by no later than November 12, 1992, the mill will have adequate time to conduct emissions tests on the various sources that would be shut down and candidates for contemporaneous emissions credit. Therefore, the Department requests that SKC conduct emissions tests on all sources that it intends to shutdown in order to calculate contemporaneous emissions credit.

Mr. L. A. Stanley
Page 2
June 6, 1990

If there are any questions, please call Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,



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

CHF/BM/t

attachments

cc: A. Kutyna, NE District
J. Manning, BESD
J. Harper, U.S. EPA
C. Shaver, NPS
T. Cole, OHF & C, P.A.



ATTACHMENT II

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

APR 4 1990

4APT-AEB

RECEIVED

APR 09 1990

DER-BAQ

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

RE: Seminole Kraft Corporation (PSD-FL-141)

Dear Mr. Fancy:

This is to acknowledge receipt of a package from your office transmitting a request from Seminole Kraft Corporation to modify their prevention of significant deterioration (PSD) permit, dated February 16, 1990. As discussed between Mr. Pradeep Raval of your staff and Mr. Gregg Worley of my staff on March 30, 1990, we have the following comments.

CREDITABLE EMISSIONS REDUCTIONS

The source has requested that conditions be placed in the PSD permit to allow them the flexibility to convert to 100% recycled fiber in lieu of constructing the new recovery boiler. In the event that the source makes the decision to convert to recycled fiber, the source would like to retain emissions credit for the units which would be shut down at the facility (i.e., the existing kraft pulp mill). The credit for shutting down any units may be retained but we must emphasize that such credit must be based on actual operating data from the two years previous to the shutdown, unless another time period is determined to be more representative of actual operating conditions. The information submitted by Seminole Kraft is based on the years 1983-84. Apparently the source used the operating hours of this time period along with presently permitted allowable emission rates to arrive at their creditable emission reductions. This is not acceptable. We would suggest that it would be prudent of FDER to require testing of the units prior to shutdown for the pollutants which are to be credited. In any case, the actual emission rates must be used rather than the permitted allowable rates unless the actual emissions exceed the allowable emissions.

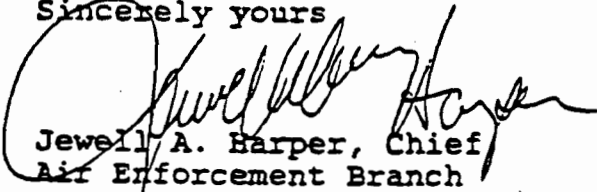
In a related matter, we do not think it is wise to include as a permit condition the language suggested by the source in provision 15 (d) which specifies what credits are available prior to the shutdown of the units. It appears that such a provision would lock FDER into accepting those numbers as creditable emissions no matter what the source operation was prior to shutdown. The fact that emissions resulting from federally enforceable shutdowns are creditable does not need to be established in a permit; the fact that such emissions are creditable is already established in federal and Florida regulations. In addition, the contemporaneous time period for which the emissions are creditable is established in regulations. Thus, it is redundant to state that "...the following emissions reductions will be available to Seminole Kraft for five (5) years from the date construction on this alternative is complete or November 12, 1992, whichever is earlier." By establishing a federally enforceable shutdown date at the completion of construction or November 12, 1992, whichever is earlier, it is understood that emissions credit is available for a period of five years from that point.

EFFECT ON THE AES CEDAR BAY PROJECT

The AES project which is currently under review for permitting plans to use the ambient impacts of shutting down several units at Seminole Kraft in their air quality analysis. How will the proposed permit amendment by Seminole Kraft affect the AES project?

Thank you for the opportunity to review and comment on this proposal by Seminole Kraft. If you have any questions or comments on this matter, please do not hesitate to contact Mr. Gregg Worley of my staff at 404/347-2864.

Sincerely yours



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



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218

LD. Number:

31-16-0067-09

Permit/Certification Number:

AO16-159612

Date of Issue:

April 12, 1989

Expiration Date:

November 12, 1992

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E- 441.750 N-3365.650

Project:

No. 1 Recovery Boiler

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

For the operation of Recovery Boiler No. 1 with a maximum feed rate of 43,333 pounds per hour of black liquor solids (BLS). Particulate emissions are controlled by an electrostatic precipitator and venturi scrubber in series. Number 6 fuel oil with a maximum sulfur content of 2.27% by weight may be used during startup, shutdown and malfunction.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

No. 1 Recovery Boiler

Control Equipment

Koppers Electrostatic Precipitator
Varkaus Scrubber, Model P-1200

Emission source(s) shall be as follows:

Point

09

Source

No. 1 Recovery Boiler

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

- (1) Permit application received January 10, 1989
- (2) Permit AO16-71206

BEST AVAILABLE COPY

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-09

AO16-159612

April 12, 1989

November 12, 1992

GENERAL CONDITIONS:

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.

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.

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.

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.

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.

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.

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.

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 non-compliance, including exact 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 revocation of this permit.

Permittee:

Seminole Kraft Corporation

L.D. Number:**Permit/Certification Number:****Date of Issue:****Expiration Date:**

31-16-0067-09

AO16-159612

April 12, 1989

November 12, 1992

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 non-compliance 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)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () 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.
 - 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.

Permittee:

Seminole Kraft Corporation

I.D. Number:**Permit/Certification Number:****Date of Issue:****Expiration Date:**

31-16-0067-09

AO16-159612

April 12, 1989

November 12, 1992

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)5., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
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>
09	Particulate Matter (PM)	3 Months	EPA Reference Method (RM) 5
	Total Reduced Sulfur (TRS)	Upon Request	EPA RM 16/16A
	Fuel Oil Analysis (% Sulfur)	Upon Request*	

*No. 6 Fuel Oil and Black Liquor

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</u>	<u>Other</u>
09	PM	17-2.600(4)(b)1.	2.202	
	TRS	17-2.960(1)(d)2.b		

Permittee:
Seminole Kraft Corporation

L.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

31-16-0067-09
AO16-159612
April 12, 1989
November 12, 1992

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>
09	PM	43.3	189.7	3 lbs/3000 lb BLS	
	TRS*				

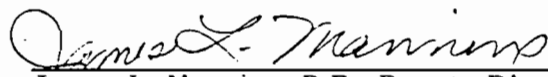
*An interim allowable TRS emission limit shall be established based on performance evaluation. This permit shall be revised to include an interim allowable emission limit at the conclusion of the performance evaluation when maximum allowable emissions are established.

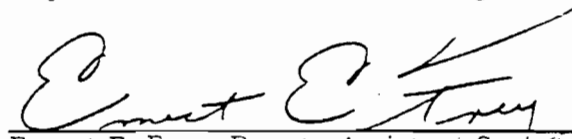
11. Operation shall be limited to 8760 hours per year.
12. The maximum feed rate of black liquor solids shall be limited to 43,333 pounds per hour.
13. The maximum heat input shall be limited to 286×10^6 BTUs per hour.
14. Quarterly reports of TRS emissions, as measured by the Continuous Emission Monitor (CEM), shall be submitted to BESD in accordance with Section 17-2.710(4), FAC. A complete file of all measurements shall be maintained in accordance with Section 17-2.710(4)(b).
15. Feed rate of black liquor solids to the recovery furnace shall be monitored and recorded every hour. The log sheets documenting hourly feed rates shall be maintained for a period of two (2) years, and shall be made available to BESD personnel for inspection.
16. An Operation and Maintenance Plan shall be attached to and shall be part of this permit in accordance with Rule 17-2.650(2)(g), Florida Administrative Code. All activities shall be performed as scheduled and recorded data made available to BESD upon request. Records shall be maintained on file for a minimum period of two (2) years.

Issued this 12 day of April, 1989

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services

State of Florida
Department of Environmental Regulation


James L. Manning, P.E., Deputy Director


Ernest E. Frey, Deputy Assistant Secretary

- 1 Florida Administrative Code
- 2 Jacksonville Environmental Protection Board

5 Pages Attached

Page 5 of 5

DER FORM 17-1.201(5) Effective November 30, 1982
(Disc: 8/12-14 rlj)

FEB 9 1990



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Mr. Lawrence A. Stanley
General Manager
Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218-0998

RE: DUVAL COUNTY - AIR POLLUTION
Seminole Kraft Corporation
No. 1 Recovery Boiler
Permit No. AO16-159612
LD. No. 31-16-0067-09

Dear Mr. Stanley:

The Bio-Environmental Services Division (BESD) and the Department of Environmental Regulation (DER) have approved the revision of the captioned permit(s) as follows:

SPECIFIC CONDITION NO 8

From: 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>
09	Particulate Matter (PM)	3 Months	EPA Reference Method (RM) 5
	Total Reduced Sulfur (TRS)	Upon Request	EPA RM 16/16A
	Fuel Oil Analysis (% Sulfur)	Upon Request*	

*No. 6 Fuel Oil and Black Liquor

To: 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>
09	Particulate Matter (PM)	6 Months	EPA Reference Method (RM) 5
	Total Reduced Sulfur (TRS)	Upon Request	EPA RM 16/16A
	Fuel Oil Analysis (% Sulfur)	Upon Request*	

*No. 6 Fuel Oil and Black Liquor

This letter and Oertel, Hoffman, Fernandez & Cole, P.A., letter dated January 4, 1990, shall be attached to and become part of the captioned permit.

Mr. Lawrence A. Stanley
Seminole Kraft Corporation
No. 1 Recovery Boiler
Page 2

Department of Environmental Regulation
Division of Air Quality Management

Any questions in this matter should be directed to Mr. Ronald L. Roberson at (904) 630-3666.

Very truly yours,

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services

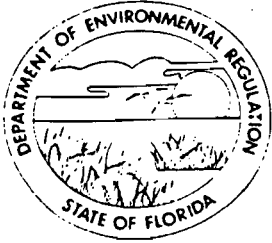
State of Florida
Department of Environmental Regulation

James L. Manning
James L. Manning, P.E., Deputy Director

Ernest E. Frey
Ernest E. Frey, P.E., Deputy Assistant Secretary

JLM/EEF/RLR/rlj:46

cc: Mr. Andrew G. Kutyna, P.E., DER
BESD Air Permitting File
BESD File 2155-F



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218

LD. Number:

31-16-0067-10

Permit/Certification Number:

AO16-159615

Date of Issue:

April 12, 1989

Expiration Date:

November 12, 1992

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E- 441.750 N-3365.650

Project:

No. 2 Recovery Boiler

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

For the operation of Recovery Boiler No. 2 with a maximum feed rate of 55,417 pounds per hour of black liquor solids (BLS). Particulate emissions are controlled by an electrostatic precipitator and venturi scrubber in series. Number 6 fuel oil with a maximum sulfur content of 2.27% by weight may be used during startup, shutdown and malfunction.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

No. 2 Recovery Boiler

Control Equipment

Koppers Electrostatic Precipitator
Varkaus Scrubber, Model P-250

Emission source(s) shall be as follows:

Point

10

Source

No. 2 Recovery Boiler

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

- (1) Permit application received January 10, 1989
- (2) Permit AO16-71207

BEST AVAILABLE COPY**Permittee:**

Seminole Kraft Corporation

I.D. Number:**Permit/Certification Number:****Date of Issue:****Expiration Date:**

31-16-0067-10

AO16-159615

April 12, 1989

November 12, 1992

GENERAL CONDITIONS:

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.

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.

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.

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.

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.

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.

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.

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 non-compliance, including exact 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 revocation of this permit.

Permittee:

Seminole Kraft Corporation

L.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-10

AO16-159615

April 12, 1989

November 12, 1992

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 non-compliance 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)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () 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.
 - 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.

Permittee:

Seminole Kraft Corporation

I.D. Number:**Permit/Certification Number:****Date of Issue:****Expiration Date:**

31-16-0067-10

AO16-159615

April 12, 1989

November 12, 1992

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)5., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
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>
10	Particulate Matter (PM)	3 Months	EPA Reference Method (RM) 5
	Total Reduced Sulfur (TRS)	Upon Request	EPA RM 16/16A
	Fuel Oil Analysis (% Sulfur)	Upon Request*	

*No. 6 Fuel Oil and Black Liquor

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</u>	<u>Other</u>
10	PM	17-2.600(4)(b)1.	2.202	
	TRS	17-2.960(1)(d)2.b		

Permittee:

Seminole Kraft Corporation

I.D. Number:

31-16-0067-10

Permit/Certification Number:

AO16-159615

Date of Issue:

April 12, 1989

Expiration Date:

November 12, 1992

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>
10	PM	55.4	242.7	3 lbs/3000 lb BLS	
	TRS*				

*An interim allowable TRS emission limit shall be established based on performance evaluation. This permit shall be revised to include an interim allowable emission limit at the conclusion of the performance evaluation when maximum allowable emissions are established.

11. Operation shall be limited to 8760 hours per year.

12. The maximum feed rate of black liquor solids shall be limited to 55,417 pounds per hour.

13. The maximum heat input shall be limited to 366×10^6 BTUs per hour.

14. Quarterly reports of TRS emissions, as measured by the Continuous Emission Monitor (CEM), shall be submitted to BESD in accordance with Section 17-2.710(4), FAC. A complete file of all measurements shall be maintained in accordance with Section 17-2.710(4)(b).

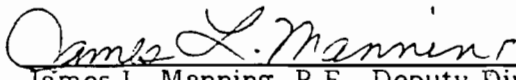
15. Feed rate of black liquor solids to the recovery furnace shall be monitored and recorded every hour. The log sheets documenting hourly feed rates shall be maintained for a period of two (2) years, and shall be made available to BESD personnel for inspection.

16. An Operation and Maintenance Plan shall be attached to and shall be part of this permit in accordance with Rule 17-2.650(2)(g), Florida Administrative Code. All activities shall be performed as scheduled and recorded data made available to BESD upon request. Records shall be maintained on file for a minimum period of two (2) years.

Issued this 12 day of April, 1989

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services

State of Florida
Department of Environmental Regulation


James L. Manning, P.E., Deputy Director


Ernest E. Frey, Deputy Assistant Secretary

¹ Florida Administrative Code

² Jacksonville Environmental Protection Board

FEB 9 1990



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Mr. Lawrence A. Stanley
General Manager
Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218-0998

RE: DUVAL COUNTY - AIR POLLUTION
Seminole Kraft Corporation
No. 2 Recovery Boiler
Permit No. AO16-159615
LD. No. 31-16-0067-10

Dear Mr. Stanley:

The Bio-Environmental Services Division (BESD) and the Department of Environmental Regulation (DER) have approved the revision of the captioned permit(s) as follows:

SPECIFIC CONDITION NO 8

From: 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>
10	Particulate Matter (PM)	3 Months	EPA Reference Method (RM) 5
	Total Reduced Sulfur (TRS)	Upon Request	EPA RM 16/16A
	Fuel Oil Analysis (% Sulfur)	Upon Request*	

*No. 6 Fuel Oil and Black Liquor

To: 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>
10	Particulate Matter (PM)	6 Months	EPA Reference Method (RM) 5
	Total Reduced Sulfur (TRS)	Upon Request	EPA RM 16/16A
	Fuel Oil Analysis (% Sulfur)	Upon Request*	

*No. 6 Fuel Oil and Black Liquor

This letter and Oertel, Hoffman, Fernandez & Cole, P.A., letter dated January 4, 1990, shall be attached to and become part of the captioned permit.

Mr. Lawrence A. Stanley
Seminole Kraft Corporation
No. 2 Recovery Boiler
Page 2

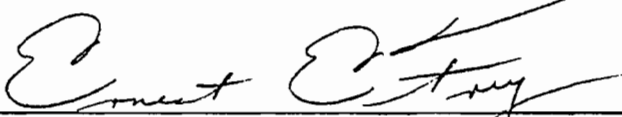
Any questions in this matter should be directed to Mr. Ronald L. Roberson at (904) 630-3666.

Very truly yours,

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services

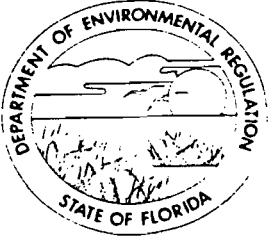
State of Florida
Department of Environmental Regulation


James L. Manning, P.E., Deputy Director


Ernest E. Frey, P.E., Deputy Assistant Secretary

JLM/EEF/RLR/rlj:45

cc: Mr. Andrew G. Kutyna, P.E., DER
BESD Air Permitting File
BESD File 2155-G



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218

L.D. Number:

31-16-0067-11

Permit/Certification Number:

AO16-159616

Date of Issue:

April 12, 1989

Expiration Date:

November 12, 1992

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E- 441.750 N-3365.650

Project:

No. 3 Recovery Boiler

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

For the operation of Recovery Boiler No. 3 with a maximum feed rate of 55,417 pounds per hour of black liquor solids (BLS). Particulate emissions are controlled by an electrostatic precipitator and venturi scrubber in series. Number 6 fuel oil with a maximum sulfur content of 2.27% by weight may be used during startup, shutdown and malfunction.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

No. 3 Recovery Boiler

Control Equipment

Koppers Electrostatic Precipitator
Varkaus Scrubber, Model P-250

Emission source(s) shall be as follows:

Point

11

Source

No. 3 Recovery Boiler

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

- (1) Permit application received January 10, 1989
- (2) Permit AO16-71208

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-11

AO16-159616

April 12, 1989

November 12, 1992

GENERAL CONDITIONS:

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.

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.

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.

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.

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.

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.

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.

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 non-compliance, including exact 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 revocation of this permit.

Permittee:

Seminole Kraft Corporation

L.D. Number:**Permit/Certification Number:****Date of Issue:****Expiration Date:**

31-16-0067-11

AO16-159616

April 12, 1989

November 12, 1992

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 non-compliance 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)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () 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.
 - 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.

Seminole Kraft Corporation

Permit/Certification Number:
Date of Issue:
Expiration Date:

31-16-0067-11
AO16-159616
April 12, 1989
November 12, 1992

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)5., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
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>
11	Particulate Matter (PM)	3 Months	EPA Reference Method (RM) 5
	Total Reduced Sulfur (TRS)	Upon Request	EPA RM 16/16A
	Fuel Oil Analysis (% Sulfur)	Upon Request*	

*No. 6 Fuel Oil and Black Liquor

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</u>	<u>Other</u>
11	PM	17-2.600(4)(b)1.	2.202	
	TRS	17-2.960(1)(d)2.b		

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-11

AO16-159616

April 12, 1989

November 12, 1992

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>
11	PM	55.4	242.7	3 lbs/3000 lb BLS	
	TRS*				

*An interim allowable TRS emission limit shall be established based on performance evaluation. This permit shall be revised to include an interim allowable emission limit at the conclusion of the performance evaluation when maximum allowable emissions are established.

11. Operation shall be limited to 8760 hours per year.

12. The maximum feed rate of black liquor solids shall be limited to 55,417 pounds per hour.

13. The maximum heat input shall be limited to 366 x 10⁶ BTUs per hour.

14. Quarterly reports of TRS emissions, as measured by the Continuous Emission Monitor (CEM), shall be submitted to BESD in accordance with Section 17-2.710(4), FAC. A complete file of all measurements shall be maintained in accordance with Section 17-2.710(4)(b).


15. Feed rate of black liquor solids to the recovery furnace shall be monitored and recorded every hour. The log sheets documenting hourly feed rates shall be maintained for a period of two (2) years, and shall be made available to BESD personnel for inspection.

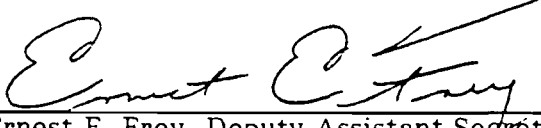
16. An Operation and Maintenance Plan shall be attached to and shall be part of this permit in accordance with Rule 17-2.650(2)(g), Florida Administrative Code. All activities shall be performed as scheduled and recorded data made available to BESD upon request. Records shall be maintained on file for a minimum period of two (2) years.

Issued this 12 day of April, 1989

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services

State of Florida
Department of Environmental Regulation


James L. Manning, P.E., Deputy Director


Ernest E. Frey, Deputy Assistant Secretary

¹ Florida Administrative Code

² Jacksonville Environmental Protection Board

FEB 9 1990



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Mr. Lawrence A. Stanley
General Manager
Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218-0998

RE: DUVAL COUNTY - AIR POLLUTION
Seminole Kraft Corporation
No. 3 Recovery Boiler
Permit No. AO16-159616
LD. No. 31-16-0067-11

Dear Mr. Stanley:

The Bio-Environmental Services Division (BESD) and the Department of Environmental Regulation (DER) have approved the revision of the captioned permit(s) as follows:

SPECIFIC CONDITION NO 8

From: 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>
11	Particulate Matter (PM)	3 Months	EPA Reference Method (RM) 5
	Total Reduced Sulfur (TRS)	Upon Request	EPA RM 16/16A
	Fuel Oil Analysis (% Sulfur)	Upon Request*	

*No. 6 Fuel Oil and Black Liquor

To: 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>
11	Particulate Matter (PM)	6 Months	EPA Reference Method (RM) 5
	Total Reduced Sulfur (TRS)	Upon Request	EPA RM 16/16A
	Fuel Oil Analysis (% Sulfur)	Upon Request*	

*No. 6 Fuel Oil and Black Liquor

This letter and Oertel, Hoffman, Fernandez & Cole, P.A., letter dated January 4, 1990 shall be attached to and become part of the captioned permit.

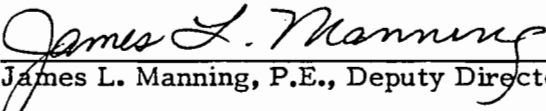
Mr. Lawrence A. Stanley
Seminole Kraft Corporation
No. 3 Recovery Boiler
Page 2

Any questions in this matter should be directed to Mr. Ronald L. Roberson at (904) 630-3666.

Very truly yours,

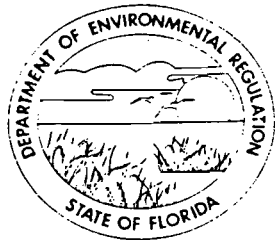
City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services

State of Florida
Department of Environmental Regulation


James L. Manning, P.E., Deputy Director
JLM/EEF/RLR/rlj:44


Ernest E. Frey, P.E., Deputy Assistant Secretary

cc: Mr. Andrew G. Kutyna, P.E., DER
BESD Air Permitting File
BESD File 2155-H



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218

I.D. Number:

31-16-0067-12

Permit/Certification Number:

AO16-155786

Date of Issue:

December 21, 1988

Expiration Date:

November 30, 1993

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-7441.8 N-3365.60

Project:

No. 1 Smelt

Dissolving Tank

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

For the operation of Smelt Dissolving Tank No. 1.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

No. 1 Smelt Dissolving Tank

Control Equipment

Munter T-271 Scrubber/Mist Eliminator

Emission source(s) shall be as follows:

Point

12

Source

No. 1 Smelt Dissolving Tank

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

- (1) Permit AC16-141794
- (2) Operating Permit Application received September 29, 1988

Best Available Copy

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-12

AO16-155786

December 21, 1989

November 30, 1993

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 Statute and department rules, unless specifically authorized by an order from the department.
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 this 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 non-compliance, including exact 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 revocation of this permit.

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-12

AO16-155786

December 21, 1988

November 30, 1993

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 non-compliance 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)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () 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.
 - 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.

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-12

AO16-155786

December 21, 1988

November 30, 1993

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)5., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
8. The following pollutant(s) shall be tested at intervals indicated from the date of May 31, 1989:

<u>Pt. No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
12	Particulate Matter (PM)	12 Months	EPA Reference Method (RM) 5
	Visible Emissions (VE)	Upon Request	EPA RM 9
	Total Reduced Sulfur (TRS)	12 Months	EPA RM 16/16A

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</u>	<u>Other</u>
12	PM	17-2.650(2)(c)10.b.	2.207	
	VE	17-2.650(2)(c)10.b.	2.207	
	TRS	17-2.600(4)(c)4.a.	2.202	
	Objectionable Odors (OO)	17-2.620(2)	2.205	

2. applicability

Permittee:
Seminole Kraft Corporation

I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

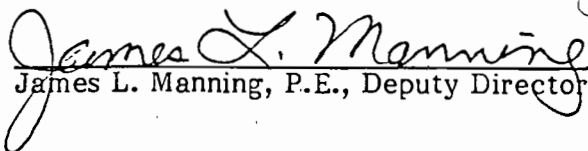
31-16-0067-12
AO16-155786
December 21, 1988
November 30, 1993

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>
12	PM	16.2	71.0		
	VE				10%
	TRS	0.82	3.6		
	OO			None Allowed	


11. The maximum process rate shall be limited to 22,706 lbs/hr green liquor solids.
12. Operation shall be limited to 8760 hours per year.
13. An Operation and Maintenance Plan shall be attached to and shall be part of this permit in accordance with Rule 17-2.650(2)(g), Florida Administrative Code. All activities shall be performed as scheduled and recorded data made available to BESD upon request. Records shall be maintained on file for a minimum period of two (2) years.
14. Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the Smelt Dissolving Tank (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.
15. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit in accordance with Rule 17-4.090, FAC. Failure to submit a renewal application sixty (60) days prior to the expiration date shall result in the assessment of a penalty in accordance with Section 360.701(a)19., Ordinance Code.

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services


James L. Manning, P.E., Deputy Director

Issued this 21 day of December, 1988

State of Florida
Department of Environmental Regulation


Ernest E. Frey, Deputy Assistant Secretary

- 1 Florida Administrative Code
- 2 Jacksonville Environmental Protection Board

5 Pages Attached

Page 5 of 5

DER FORM 17-1.201(5) Effective November 30, 1982

(Disc: 6/44-46 rlj)

ATTACHMENT G

OPERATION AND MAINTENANCE PLAN

This plan is for operation and maintenance of the No. 1, 2 and 3 Smelt Dissolving Tank Munters Model 271-S demister/scrubbers.

The operation of the demister/scrubber will be verified by checking the following parameters at the specified frequency.

1. Spray fluid pressure (each) hourly
2. Spray fluid flow (combined) twice/shift
3. Spray fluid type (weak wash, water) twice/shift
4. Clean pads by opening upper deluge nozzles once each shift or as required by pluggage record time cleaned.
5. Note time and duration of cleaning.
6. If normal cleaning procedures fail and demisters have to be removed to clean, record time out and time replaced.
7. All of the data above will be recorded on the operation log sheet for the associated recovery boiler and maintained in the power house records for at least two years.

MAINTENANCE

1. Demister/scrubber will be inspected annually during annual maintenance shutdown.
2. Breakdown maintenance will be performed as required between annual maintenance shutdowns.
3. All records of repairs/maintenance will be kept by Maintenance Department for a period of at least two years.



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218

I.D. Number:

31-16-0067-13

Permit/Certification Number:

AO16-155787

Date of Issue:

December 21, 1988

Expiration Date:

November 30, 1993

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-7441.75 N-3365.50

Project:

No. 2 Smelt

Dissolving Tank

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

For the operation of Smelt Dissolving Tank No. 2.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

No. 2 Smelt Dissolving Tank

Control Equipment

Munter T-271 Scrubber/Mist Eliminator

Emission source(s) shall be as follows:

Point

13

Source

No. 2 Smelt Dissolving Tank

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

- (1) Permit Application received September 29, 1988
- (2) Construction Permit AC16-141795

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-13

AC16-155787

December 21, 1988

November 30, 1993

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 the permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statute and department rules, unless specifically authorized by an order from the department.
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 non-compliance, including exact 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 revocation of this permit.

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-13

AO16-155787

December 21, 1988

November 30, 1993

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 non-compliance 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)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () 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.
 - 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.

Permittee: Seminole Kraft Corporation

I.D. Number:

31-16-0067-13

Permit/Certification Number:

AO16-155787

Seminole Kraft Corporation

Date of Issue:

December 21, 1988

Expiration Date:

November 30, 1993

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)5., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
8. The following pollutant(s) shall be tested at intervals indicated from the date of May 31, 1989:

<u>Pt. No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
13	Particulate Matter (PM)	12 Months	EPA Reference Method (RM) 5
	Visible Emissions (VE)	Upon Request	EPA RM 9
	Total Reduced Sulfur (TRS)	12 Months	EPA RM 16/16A

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</u>	<u>Other</u>
13	PM	17-2.650(2)(c)10.b.	2.207	
	VE	17-2.650(2)(c)10.b.	2.207	
	TRS	17-2.600(4)(c)4.a.	2.202	
	Objectionable Odors (OO)	17-2.620(2)	2.205	

Permittee:
Seminole Kraft Corporation

I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

31-16-0067-13
AO16-155787
December 21, 1988
November 30, 1993

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>
13	PM	18.9	83.0		
	VE				10%
	TRS	1.05	4.6		
	OO			None Allowed	

11. The maximum process rate shall be limited to 29,040 lbs/hr green liquor solids.

12. Operation shall be limited to 8760 hours per year.

13. An Operation and Maintenance Plan shall be attached to and shall be part of this permit in accordance with Rule 17-2.650(2)(g), Florida Administrative Code. All activities shall be performed as scheduled and recorded data made available to BESD upon request. Records shall be maintained on file for a minimum period of two (2) years.

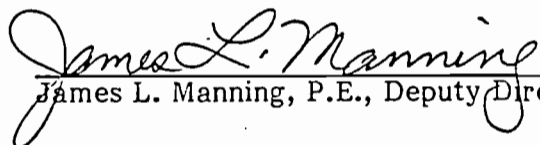
14. Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the Smelt Dissolving Tank (SDT) is subject to the provisions of FAC Rules 17-2.710(3)(d), Establishing Specific Surrogate Parameters, and 17-2.710(4), Quarterly Reporting Requirements. The SDT is subject to the provisions of FAC Rule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

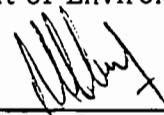
15. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit in accordance with Rule 17-4.090, FAC. Failure to submit a renewal application sixty (60) days prior to the expiration date shall result in the assessment of a penalty in accordance with Section 360.701(a)19., Ordinance Code.

Issued this 21 day of December, 1988

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services

State of Florida
Department of Environmental Regulation


James L. Manning, P.E., Deputy Director


Ernest E. Frey, Deputy Assistant Secretary

1 Florida Administrative Code

2 Jacksonville Environmental Protection Board

5 Pages Attached

Page 5 of 5

DER FORM 17-1.201(5) Effective November 30, 1982

(Disc: 6/38-40 rlj)

ATTACHMENT G

OPERATION AND MAINTENANCE PLAN

This plan is for operation and maintenance of the No. 1, 2 and 3 Smelt Dissolving Tank Munters Model 271-S demister/scrubbers.

The operation of the demister/scrubber will be verified by checking the following parameters at the specified frequency:

1. Spray fluid pressure (each) hourly
2. Spray fluid flow (combined) twice/shift
3. Spray fluid type (weak wash, water) twice/shift
4. Clean pads by opening upper deluge nozzles once each shift or as required by pluggage record time cleaned.
5. Note time and duration of cleaning.
6. If normal cleaning procedures fail and demisters have to be removed to clean, record time out and time replaced.
7. All of the data above will be recorded on the operation log sheet for the associated recovery boiler and maintained in the power house records for at least two years.

MAINTENANCE

1. Demister/scrubber will be inspected annually during annual maintenance shutdown.
2. Breakdown maintenance will be performed as required between annual maintenance shutdowns.
3. All records of repairs/maintenance will be kept by Maintenance Department for a period of at least two years.



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218

I.D. Number:

31-16-0067-14

Permit/Certification Number:

AO16-155788

Date of Issue:

December 21, 1988

Expiration Date:

November 30, 1993

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-7441.8 N-3365.55

Project:

No. 3 Smelt

Dissolving Tank

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

For the operation of Smelt Dissolving Tank No. 3.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

No. 3 Smelt Dissolving Tank

Control Equipment

Munter T-271 Scrubber/Mist Eliminator

Emission source(s) shall be as follows:

Point

14

Source

No. 3 Smelt Dissolving Tank

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

- (1) Permit AC16-141796
- (2) Operating permit application received September 29, 1988

Permittee:

Seminole Kraft Corporation

I.D. Number:

31-16-0067-14

Permit/Certification Number:

AO16-155788

Date of Issue:

December 21, 1993

Expiration Date:

November 30, 1993

Florida Department of Environmental Regulation

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.
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 non-compliance, including exact 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 revocation of this permit.

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-14

AO16-155788

December 21, 1988

November 30, 1993

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 non-compliance 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)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () 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.
 - 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.

Permittee: Seminole Kraft Corporation
Seminole Kraft Corporation

I.D. Number: 31-16-0067-14
Permit/Certification Number: AO16-155788
Date of Issue: December 21, 1988
Expiration Date: November 30, 1993

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)5., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
8. The following pollutant(s) shall be tested at intervals indicated from the date of May 31, 1989:

<u>Pt. No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
14	Particulate Matter (PM)	12 Months	EPA Reference Method (RM) 5
	Visible Emissions (VE)	Upon Request	EPA RM 9
	Total Reduced Sulfur (TRS)	12 Months	EPA RM 16/16A

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</u>	<u>Other</u>
14	PM	17-2.650(2)(c)10.b.	2.207	
	VE	17-2.650(2)(c)10.b.	2.207	
	TRS	17-2.600(4)(c)4.a.	2.202	
	Objectionable Odors (OO)	17-2.620(2)	2.205	

Permittee:
Seminole Kraft Corporation

I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

31-16-0067-14
AO16-155788
December 21, 1988
November 30, 1993

10. The maximum allowable emissions shall be as follows:

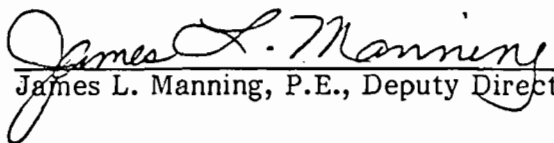
<u>Pt. No</u>	<u>Pollutant</u>	<u>lbs/hr</u>	<u>T/yr</u>	<u>Other</u>	<u>Opacity</u>
14	PM	18.9	83.0		
	VE				10%
	TRS	1.05	4.6		
	OO			None Allowed	

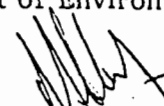
11. The maximum process rate shall be limited to 29,040 lbs/hr green liquor solids.
12. Operation shall be limited to 8760 hours per year.
13. An Operation and Maintenance Plan shall be attached to and shall be part of this permit in accordance with Rule 17-2.650(2)(g), Florida Administrative Code. All activities shall be performed as scheduled and recorded data made available to BESD upon request. Records shall be maintained on file for a minimum period of two (2) years.
14. Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the Smelt Dissolving Tank (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.
15. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit in accordance with Rule 17-4.090, FAC. Failure to submit a renewal application sixty (60) days prior to the expiration date shall result in the assessment of a penalty in accordance with Section 360.701(a)19., Ordinance Code.

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services

Issued this 21 day of December, 1988

State of Florida
Department of Environmental Regulation


James L. Manning, P.E., Deputy Director


Ernest E. Frey, Deputy Assistant Secretary

- ¹ Florida Administrative Code
² Jacksonville Environmental Protection Board

5 Pages Attached

Page 5 of 5

DER FORM 17-1.201(5) Effective November 30, 1982

(Disc: 6/41-43 rlj)

ATTACHMENT G

OPERATION AND MAINTENANCE PLAN

This plan is for operation and maintenance of the No. 1, 2 and 3 Smelt Dissolving Tank Munters Model 271-S demister/scrubbers.

The operation of the demister/scrubber will be verified by checking the following parameters at the specified frequency.

1. Spray fluid pressure (each) hourly
2. Spray fluid flow (combined) twice/shift
3. Spray fluid type (weak wash, water) twice/shift
4. Clean pads by opening upper deluge nozzles once each shift or as required by pluggage record time cleaned.
5. Note time and duration of cleaning.
6. If normal cleaning procedures fail and demisters have to be removed to clean, record time out and time replaced.
7. All of the data above will be recorded on the operation log sheet for the associated recovery boiler and maintained in the power house records for at least two years.

MAINTENANCE

1. Demister/scrubber will be inspected annually during annual maintenance shutdown.
2. Breakdown maintenance will be performed as required between annual maintenance shutdowns.
3. All records of repairs/maintenance will be kept by Maintenance Department for a period of at least two years.

APR 12 1990



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED - RETURN RECEIPT

Mr. L.A. Stanley, General Manager
Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218

Dear Mr. Stanley:

Duval County - AP
Seminole Kraft Corporation
No. 1 Lime Kiln

Enclosed is Permit Number A016-174975 to operate the subject air pollution source, pursuant to Section 403.087, Florida Statutes (FS).

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. 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 14 days of receipt of this Permit. 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, Florida Statutes.

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.

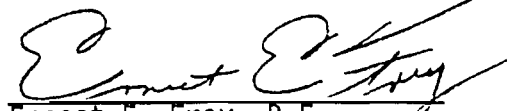
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 receipt 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, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order 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 the Final Order is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

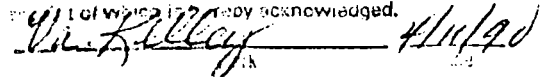


Ernest E. Frey, P.E.
Deputy Assistant Secretary

EEF:dhk

Copies furnished to: Jacksonville BES

FILING AND ACKNOWLEDGEMENT
FILED on this date, pursuant to §120.52, Florida
Statutes, with the designated Department Clerk,
of which I hereby acknowledge.



CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 4/11/90 to the listed persons.



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
P.O. Box 26998
Jacksonville, FL 32218

I.D. Number:

31-16-0067-01

Permit/Certification Number:

AO16-174975

Date of Issue:

March 27, 1990

Expiration Date:

February 28, 1995

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-441.750 N-3365.600

Project:

No. 1 Lime Kiln

Revised:

4/11/90

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

For the operation of No. 1 Lime Kiln fired with No. 6 fuel oil.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

Control Equipment

No. 1 Lime Kiln

CHEMICO S - F Venturi Scrubber

Emission source(s) shall be as follows:

Point

Source

01

No. 1 Lime Kiln

Located at 9469 Eastport Road, Jacksonville, Florida 32229.

Supporting documents shall be as follows:

- (1) Permit No. AC16-141790
- (2) Certificate of Completion of Construction received December 28, 1989

BEST AVAILABLE COPY

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number

Date of Issue:

Expiration Date:

Revised:

31-16-0667-01

A.O16-174975

March 27, 1990

February 28, 1995

4/11/90

GENERAL CONDITIONS:

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 Sections 403.141, 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.

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.

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 this permit.

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.

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.

The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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.

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 reasonable times, 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 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.

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 non-compliance, 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

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

Revised:

31-16-0067-01

AO16-174975

March 27, 1990

February 28, 1995

4/11/92

9. In accepting this permit, the permittee understands and agrees that all reports, 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 403.111 and 403.73, 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 Rules 17-4.120 and 17-30.300, FAC, 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. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. 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 this 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 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.

Permittee:

Seminole Kraft Corporation

L.D. Number:**Permit/Certification Number:****Date of Issue:****Expiration Date:****Revised:**

31-16-0067-01

AO16-174975

March 27, 1990

February 28, 1995

4/11/90

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) at least fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)9., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
8. The following pollutant(s) shall be tested at intervals indicated from the date of July 1, 1989:

<u>Pt. No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
01	Particulate Matter (PM)	6 Months	EPA Reference Method (RM) 5
	Visible Emissions (VE)	Upon Request	EPA RM 9
	Total Reduced Sulfur (TRS)	12 Months	EPA RM 16/16A

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</u>	<u>Other</u>
01	PM	17-2.650(2)(c)9.b.	2.207	
	VE	17-2.650(2)(c)9.b.	2.207	
	TRS	17-2.600(4)(c)5.a.	2.202	

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>
01	PM	16.0	70.1		
	VE				10%
	TRS	1.86	8.2	20 ppmvd @ 10% O ₂	

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

Revised:

31-16-0067-01

AO16-174975

March 27, 1990

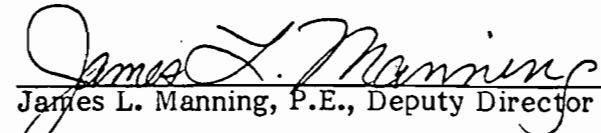
February 28, 1995

4/11/90

11. Operation shall be limited to 8760 hours per year.
12. The maximum lime production rate shall not exceed 12,200 lbs CaO/hr (dry) and is based on a total process input rate of 24,000 lbs/hr lime mud (dry).
13. The No. 6 fuel oil firing rate shall not exceed 400 gals/hr (60 MMBTU/hr heat input). The sulfur content of the fuel oil shall not exceed 2.3% by weight.
14. The lime kiln is subject to the provisions of FAC Rules 17-2.240: Circumvention, 17-2.250: Excess Emissions, 17-4.130: Plant Operations-Problems, 17-2.710(3)(b) Continuous Monitoring, 17-2.710(4): Quarterly Reporting Requirements, 17-4.140: Reports, and 17-2.971(1)(c): Compliance Schedules for Continuous Monitoring Requirements.
15. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive emissions.
16. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).
17. The lime kiln shall be in compliance with all applicable provisions of FAC Rules 17-2 and 17-4.
18. An Operation and Maintenance Plan shall be attached to and shall be part of this permit in accordance with Rule 17-2.650(2)(g), Florida Administrative Code. All activities shall be performed as scheduled and recorded data made available to BESD upon request. Records shall be maintained on file for a minimum period of two (2) years.
19. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit in accordance with Rule 17-4.090, FAC. Failure to submit a renewal application sixty (60) days prior to the expiration date shall result in the assessment of a penalty in accordance with Section 360.701(a)19., Ordinance Code.

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services

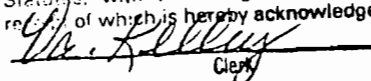

State of Florida
Department of Environmental Regulation


James L. Manning, P.E., Deputy Director


Ernest E. Frey, P.E., Deputy Assistant Secretary

¹ Florida Administrative Code
² Jacksonville Environmental Protection Board

FILING AND ACKNOWLEDGEMENT
FILED on this date, pursuant to S120.52, Florida
Statutes, with the designated Department Clerk,
referred to of which is hereby acknowledged.


Clerk 
Date



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED - RETURN RECEIPT

Mr. L.A. Stanley, General Manager
Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218

Dear Mr. Stanley:

Duval County - AP
Seminole Kraft Corporation
No. 2 Lime Kiln

Enclosed is Permit Number A016-174976 to operate the subject air pollution source, pursuant to Section 403.087, Florida Statutes (FS).

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. 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 14 days of receipt of this Permit. 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, Florida Statutes.

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.

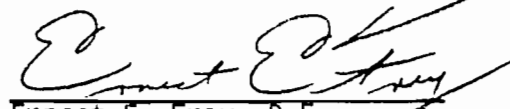
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 receipt 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, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order 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 the Final Order is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

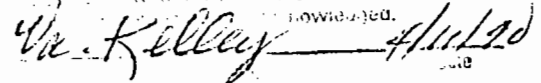


Ernest E. Frey, P.E.
Deputy Assistant Secretary

EEF:dhk

Copies furnished to: Jacksonville BES

RECEIVED AND ACKNOWLEDGEMENT
This document, pursuant to 4120.012, Florida
Statutes, was received by the Department Clerk,
and is hereby acknowledged.
4/11/90



CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 4/11/90 to the listed persons.



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
P.O. Box 26998
Jacksonville, FL 32218

I.D. Number:

31-16-0067-02

Permit/Certification Number:

AO16-174976

Date of Issue:

March 27, 1990

Expiration Date:

February 28, 1995

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-441.75 N-3365.60

Project:

Lime Kiln No. 2

Revised:

4/11/90

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

For the operation of the No. 2 Lime Kiln. The maximum heat input is 60×10^6 BTUs per hour firing No. 6 fuel oil.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

Control Equipment

Lime Kiln No. 2

ZURN FA-0055 Venturi Scrubber

Emission source(s) shall be as follows:

Point

Source

02

Lime Kiln No. 2

Located at 9469 Eastport Road, Jacksonville, Florida 32229.

Supporting documents shall be as follows:

- (1) Permit AC16-141792
- (2) Certificate of Completion of Construction received December 28, 1989

BEST AVAILABLE COPY

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

Revised:

31-16-0067-02

AO16-174976

March 27, 1990

February 28, 1995

4/11/90

GENERAL CONDITIONS:

- . 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 Sections 403.141, 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.
- . 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.
- . 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 this permit.
- . 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.
- . 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.
- . The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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.
- . 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 reasonable times, 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 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.

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 non-compliance, 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

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

Revised:

31-16-0067-02

AO16-174976

March 27, 1990

February 28, 1995

4/11/90

9. In accepting this permit, the permittee understands and agrees that all reports, 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 403.111 and 403.73, 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 Rules 17-4.120 and 17-30.300, FAC, 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. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. 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 this 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 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.

Permittee:

Seminole Kraft Corporation

I.D. Number:**Permit/Certification Number:****Date of Issue:****Expiration Date:****Revised:**

31-16-0067-02

AO16-174976

March 27, 1990

February 28, 1995

4/11/90

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) at least fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)9., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
8. The following pollutant(s) shall be tested at intervals indicated from the date of July 1, 1989:

<u>Pt. No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
02	Particulate Matter (PM)	6 Months	EPA Reference Method (RM) 5
	Visible Emissions (VE)	Upon Request	EPA RM 9
	Total Reduced Sulfur (TRS)	12 Months	EPA RM 16/16A

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</u>	<u>Other</u>
02	PM	17-2.650(2)(c)9.b.	2.207	
	VE	17-2.650(2)(c)9.b.	2.207	
	TRS	17-2.600(4)(c)5.a.	2.202	

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>
02	PM	16.0	70.1		
	VE				10%
	TRS	1.95	8.5	20 ppmvd @ 10% O ₂	

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

Revised:

31-16-0067-02

AO16-174976

March 27, 1990

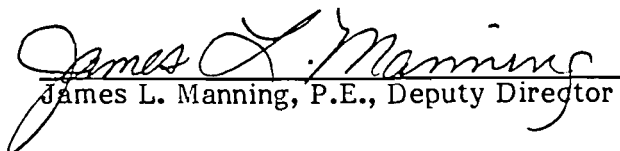
February 28, 1995

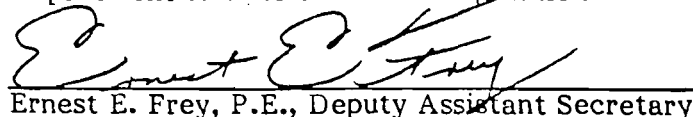
4/11/90

11. Operation shall be limited to 8760 hours per year.
12. The maximum lime production rate shall not exceed 16,300 lbs CaO/hr (dry) and is based on a total process input rate of 32,000 lbs/hr lime mud (dry).
13. The No. 6 fuel oil firing rate shall not exceed 400 gals/hr (60 MMBTU/hr heat input). The sulfur content of the fuel oil shall not exceed 2.3% by weight.
14. The No. 2 Lime Kiln shall be an incineration device for TRS emissions from the Nos. 1, 2, and 3 Multiple Effect Evaporator Systems, and Nos. 1 and 2 Batch Digester Systems.
15. The lime kiln is subject to the provisions of FAC Rules 17-2.240: Circumvention, 17-2.250: Excess Emissions, 17-4.130: Plant Operations-Problems, 17-2.710(3)(b) Continuous Monitoring, 17-2.710(4): Quarterly Reporting Requirements, 17-4.140: Reports, and 17-2.971(1)(c): Compliance Schedules for Continuous Monitoring Requirements.
16. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive emissions.
17. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).
18. The lime kiln shall be in compliance with all applicable provisions of FAC Rules 17-2 and 17-4.
19. The No. 2 Lime Kiln is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirements of establishing a contingency plan.
20. An Operation and Maintenance Plan shall be attached to and shall be part of this permit in accordance with Rule 17-2.650(2)(g), Florida Administrative Code. All activities shall be performed as scheduled and recorded data made available to BESD upon request. Records shall be maintained on file for a minimum period of two (2) years.
21. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit in accordance with Rule 17-4.090, FAC. Failure to submit a renewal application sixty (60) days prior to the expiration date shall result in the assessment of a penalty in accordance with Section 360.701(a)19., Ordinance Code.

City of Jacksonville
 Department of Health, Welfare, and
 Bio-Environmental Services

State of Florida
 Department of Environmental Regulation


 James L. Manning, P.E., Deputy Director


 Ernest E. Frey, P.E., Deputy Assistant Secretary

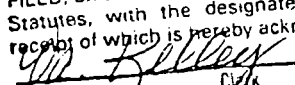
- 1 Florida Administrative Code
- 2 Jacksonville Environmental Protection Board

5 Pages Attached

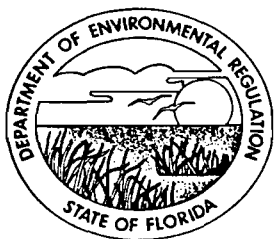
Page 5 of 5

DER FORM 17-1.201(5) Effective November 30, 1982

(Disc: 14/48-50 rlj)

FILING AND ACKNOWLEDGEMENT
 FILED on this date, pursuant to S120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.
 Clerk 4/11/90 Date

APR 12 1990



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED - RETURN RECEIPT

Mr. L.A. Stanley, General Manager
Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218

Dear Mr. Stanley:

Duval County - AP
Seminole Kraft Corporation
No. 3 Lime Kiln

Enclosed is Permit Number A016-174977 to operate the subject air pollution source, pursuant to Section 403.087, Florida Statutes (FS).

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. 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 14 days of receipt of this Permit. 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, Florida Statutes.

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.

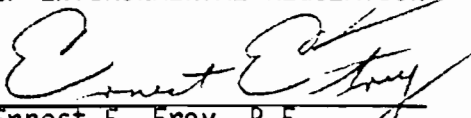
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 receipt 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, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order 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 the Final Order is filed with the Clerk of the Department.

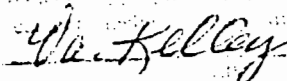
Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Ernest E. Frey, P.E.
Deputy Assistant Secretary

EEF:dhk

Copies furnished to: Jacksonville BES

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION
 4/11/90

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 4/11/90 to the listed persons.



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
P.O. Box 26998
Jacksonville, FL 32218

LD. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

County:

Latitude/Longitude:

UTM:

Project:

Revised:

31-16-0067-03

AO16-174977

March 27, 1990

February 28, 1995

Duval

30:25:15/81:36:00

E-441.750 N-3365.600

Lime Kiln No. 3

4/11/90

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

For the operation of No. 3 Lime Kiln fired with No. 6 fuel oil.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

Control Equipment

No. 3 Lime Kiln

ZURN Venturi Scrubber No. 7598

Emission source(s) shall be as follows:

Point

Source

03

No. 3 Lime Kiln

Located at 9469 Eastport Road, Jacksonville, Florida 32229.

Supporting documents shall be as follows:

- (1) Permit No. AC16-141793
- (2) Certificate of Completion of Construction received December 28, 1989

BEST AVAILABLE COPY

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

Revised:

31-16-0067-03

AG16-174977

March 27, 1990

February 28, 1995

4/11/90

GENERAL CONDITIONS:

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 Sections 403.141, 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.

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.

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 this permit.

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.

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.

The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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.

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 reasonable times, 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 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.

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 non-compliance, 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

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

Revised:

31-16-0067-03

AO16-174977

March 27, 1990

February 28, 1995

4/11/90

9. In accepting this permit, the permittee understands and agrees that all reports, 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 403.111 and 403.73, 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 Rules 17-4.120 and 17-30.300, FAC, 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. This permit also constitutes:
- () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. 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 this 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 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.

Permittee:

Seminole Kraft Corporation

I.D. Number:**Permit/Certification Number:****Date of Issue:****Expiration Date:****Revised:**

31-16-0067-03

AO16-174977

March 27, 1990

February 28, 1995

4/11/90

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) at least fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)9., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
8. The following pollutant(s) shall be tested at intervals indicated from the date of July 1, 1989:

<u>Pt. No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
03	Particulate Matter (PM)	6 Months	EPA Reference Method (RM) 5
	Visible Emissions (VE)	Upon Request	EPA RM 9
	Total Reduced Sulfur (TRS)	12 Months	EPA RM 16/16A

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</u>	<u>Other</u>
03	PM	17-2.650(2)(c)9.b.	2.207	
	VE	17-2.650(2)(c)9.b.	2.207	
	TRS	17-2.600(4)(c)5.a.	2.202	

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>
03	PM	16.0	70.1		
	VE				10%
	TRS	2.06	9.0	20 ppmvd @ 10% O ₂	

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

Revised:

31-16-0067-03

AO16-174977

March 27, 1990

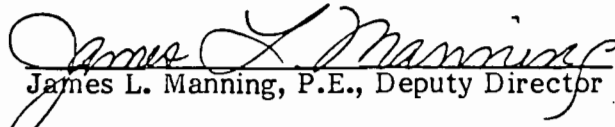
February 28, 1995

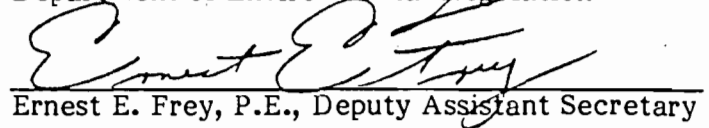
4/11/90

11. Operation shall be limited to 8760 hours per year.
12. The maximum lime production rate shall not exceed 16,300 lbs CaO/hr (dry) and is based on a total process input rate of 32,000 lbs/hr lime mud (dry).
13. The No. 6 fuel oil firing rate shall not exceed 400 gals/hr (60 MMBTU/hr heat input). The sulfur content of the fuel oil shall not exceed 2.3% by weight.
14. The No. 3 Lime Kiln shall be an incineration device for TRS emissions from the Nos. 1, 2, and 3 Multiple Effect Evaporator Systems, and Nos. 1 and 2 Batch Digester Systems.
15. The lime kiln is subject to the provisions of FAC Rules 17-2.240: Circumvention, 17-2.250: Excess Emissions, 17-4.130: Plant Operations-Problems, 17-2.710(3)(b) Continuous Monitoring, 17-2.710(4): Quarterly Reporting Requirements, 17-4.140: Reports, and 17-2.971(1)(c): Compliance Schedules for Continuous Monitoring Requirements.
16. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive emissions.
17. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).
18. The lime kiln shall be in compliance with all applicable provisions of FAC Rules 17-2 and 17-4.
19. The No. 3 Lime Kiln is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirements of establishing a contingency plan.
20. An Operation and Maintenance Plan shall be attached to and shall be part of this permit in accordance with Rule 17-2.650(2)(g), Florida Administrative Code. All activities shall be performed as scheduled and recorded data made available to BESD upon request. Records shall be maintained on file for a minimum period of two (2) years.
21. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit in accordance with Rule 17-4.090, FAC. Failure to submit a renewal application sixty (60) days prior to the expiration date shall result in the assessment of a penalty in accordance with Section 360.701(a)19., Ordinance Code.

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services

State of Florida
Department of Environmental Regulation


James L. Manning, P.E., Deputy Director


Ernest E. Frey, P.E., Deputy Assistant Secretary

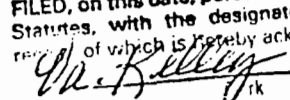
- 1 Florida Administrative Code
- 2 Jacksonville Environmental Protection Board

5 Pages Attached

Page 5 of 5

DER FORM 17-1.201(5) Effective November 30, 1982

(Disc: 14/51-53 rlj)

FILING AND ACKNOWLEDGEMENT
 FILED, on this date, pursuant to S120.52 Florida
 Statutes, with the designated Department Clerk,
 of which is hereby acknowledged.
 4/11/90
 Date



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, FL 32218-0998

LD. Number:

31-16-0067-27

Permit/Certification Number:

AO16-167882

Date of Issue:

October 17, 1989

Expiration Date:

September 30, 1994

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-441.75 N-3365.60

Project:

Multiple Effect
Evaporator No. 1

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

For the operation of Multiple Effect Evaporator (MEE) No. 1. Weak black liquor is sent to a six (6) stage (in series) evaporation system. Heat is applied to the black liquor in each stage driving off vapor and thus concentrating the liquor. Vapors from the sixth stage evaporator discharge to a SCHUTTE-KOERTING multi-jet spray type barometric condenser which discharges to the evaporator hot well. Total reduced sulfur (TRS) emissions are discharged to the non-condensable gas collection system for incineration in the No. 2 or No. 3 Lime Kiln.

Emission source(s) shall be as follows:

Point No.

27

Source

MEE No. 1

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

- (1) Permit AO16-116141
- (2) Application received July 24, 1989

BEST AVAILABLE COPY

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-27

AO16-167882

October 17, 1989

September 30, 1994

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 Sections 403.141, 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 this 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 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 and 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 reasonable times, 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 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 non-compliance, 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

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-27

AO16-167882

October 17, 1989

September 30, 1994

9. In accepting this permit, the permittee understands and agrees that all reports, 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 403.111 and 403.73, 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 Rules 17-4.120 and 17-30.300, FAC, 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. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. 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 this 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 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.

Permittee:

Seminole Kraft Corporation

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-27

AO16-167882

October 17, 1989

September 30, 1994

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) at least fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)9., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
5. TRS emission control equipment shall be provided with a method of access that is safe and readily accessible. Stack sampling ports and platforms shall not be required.
6. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.

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

<u>Pt. No.</u>	<u>Pollutant</u>	¹ <u>FAC</u>	² <u>JEPB</u>	<u>Other</u>
27	TRS	17-2.600(4)(c)1.	2.202	

8. 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>
27	TRS			*20 ppm

*As measured in emissions from Lime Kiln No. 2 or No. 3

9. Operation of MEE No. 1 shall be limited to 8760 hours per year.
10. The maximum permitted capacity shall be limited to 330,000 pounds per hour of weak black liquor at 15% solids.

Permittee:
Seminole Kraft Corporation

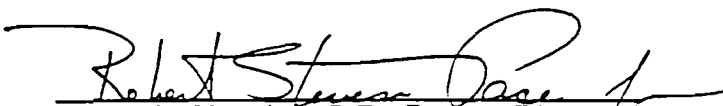
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Permit/Certification Number:
Date of Issue:
Expiration Date:

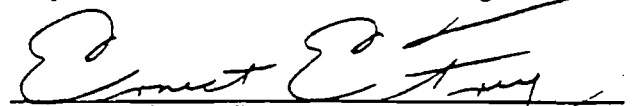
31-16-0067-27
AO16-167882
October 17, 1989
September 30, 1994

11. The permittee shall minimize TRS emission from MEE No. 1 by:
 - A. Maintaining evaporator ductwork to minimize air infiltration.
 - B. Properly operating cooling towers.
12. The permittee shall vent TRS emissions only in accordance with Rule 17-2.600(4)(c)1.c., FAC.
13. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit in accordance with Rule 17-4.090, FAC. Failure to submit a renewal application sixty (60) days prior to the expiration date shall result in the assessment of a penalty in accordance with Section 360.701(a)19., Ordinance Code.

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services

State of Florida
Department of Environmental Regulation


James L. Manning, P.E., Deputy Director


Ernest E. Frey, Deputy Assistant Secretary

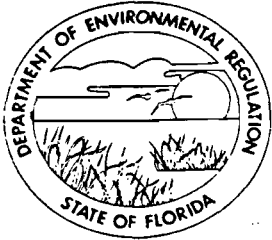
- 1 Florida Administrative Code
- 2 Jacksonville Environmental Protection Board

5 Pages Attached

Page 5 of 5

DER FORM 17-1.201(5) Effective November 30, 1982

(Disc: 12/3,8 rlj)



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, FL 32218-0998

LD. Number:

31-16-0067-28

Permit/Certification Number:

AO16-167883

Date of Issue:

October 17, 1989

Expiration Date:

September 30, 1994

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-441.75 N-3365.60

Project:

Multiple Effect

Evaporator No. 2

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

For the operation of Multiple Effect Evaporator (MEE) No. 2. Weak black liquor is sent to a six (6) stage (in series) evaporation system. Heat is applied to the black liquor in each stage driving off vapor and thus concentrating the liquor. Vapors from the sixth stage evaporator discharge to a SCHUTTE-KOERTING multi-jet spray type barometric condenser which discharges to the evaporator hot well. Total reduced sulfur (TRS) emissions are discharged to the non-condensable gas collection system for incineration in the No. 2 or No. 3 Lime Kiln.

Emission source(s) shall be as follows:

Point No.

28

Source

MEE No. 2

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

- (1) Permit AO16-116142
- (2) A pplication received July 24, 1989

Seminole Kraft Corporation

Date of Issue:
 Expiration Date:

CONDITIONS:

Terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" as such are binding upon the permittee and enforceable pursuant to Sections 403.141, 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.

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.

As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not vest 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 this permit.

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

This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant life, or property caused by the construction or operation of this permitted source, or from penalties therefor 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.

The permittee shall properly operate and maintain the facility and systems of treatment and control (and related equipment) that are installed and 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.

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 reasonable times, 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 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.

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

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 non-compliance, 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

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-28

AO16-167883

October 17, 1989

September 30, 1994

9. In accepting this permit, the permittee understands and agrees that all reports, 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 403.111 and 403.73, 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 Rules 17-4.120 and 17-30.300, FAC, 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. This permit also constitutes:
- Determination of Best Available Control Technology (BACT)
 - Determination of Prevention of Significant Deterioration (PSD)
 - Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - Compliance with New Source Performance Standards
14. 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 this 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 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.

Permittee:
Seminole Kraft Corporation

I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

31-16-0067-28
AO16-167883
October 17, 1989
September 30, 1994

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) at least fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)9., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
5. TRS emission control equipment shall be provided with a method of access that is safe and readily accessible. Stack sampling ports and platforms shall not be required.
6. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
7. The following pollutant(s) shall be tested at intervals indicated from the date of January 1, 1986:

<u>Pt. No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
28	TRS	Upon Request	EPA Reference Method 16 or 16A

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</u>	<u>Other</u>
28	TRS	17-2.600(4)(c)1.	2.202	

9. 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>
28	TRS			*20 ppm

*As measured in emissions from Lime Kiln No. 2 or No. 3

10. Operation of MEE No. 2 shall be limited to 8760 hours per year.
11. The maximum permitted capacity shall be limited to 450,000 pounds per hour of weak black liquor at 15% solids.

Permittee:

Seminole Kraft Corporation

L.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-28

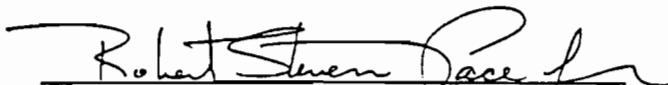
AO16-167883

October 17, 1989


September 30, 1994

12. The permittee shall minimize TRS emission from MEE No. 2 by:
 - A. Maintaining evaporator ductwork to minimize air infiltration.
 - B. Properly operating cooling towers.
13. The permittee shall vent TRS emissions only in accordance with Rule 17-2.600(4)(c)1.c., FAC.
14. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit in accordance with Rule 17-4.090, FAC. Failure to submit a renewal application sixty (60) days prior to the expiration date shall result in the assessment of a penalty in accordance with Section 360.701(a)19., Ordinance Code.

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services


James L. Manning, P.E., Deputy Director

State of Florida
Department of Environmental Regulation


Ernest E. Frey, Deputy Assistant Secretary

¹ Florida Administrative Code

² Jacksonville Environmental Protection Board



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, FL 32218-0998

L.D. Number:

31-16-0067-29

Permit/Certification Number:

AO16-167884

Date of Issue:

October 17, 1989

Expiration Date:

September 30, 1994

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-441.75 N-3365.60

Project:

Multiple Effect

Evaporator No. 3

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

For the operation of Multiple Effect Evaporator (MEE) No. 3. Weak black liquor is sent to a six (6) stage (in series) evaporation system. Heat is applied to the black liquor in each stage driving off vapor and thus concentrating the liquor. Vapors from the sixth stage evaporator discharge to a SCHUTTE-KOERTING multi-jet spray type barometric condenser which discharges to the evaporator hot well. Total reduced sulfur (TRS) emissions are discharged to the non-condensable gas collection system for incineration in Lime Kilns No. 2 or No. 3.

Emission source(s) shall be as follows:

Point No.

29

Source

MEE No. 3

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

- (1) Permit AO16-116143
- (2) Application received July 24, 1989

Permittee:

Seminole Kraft Corporation

I.D. Number:**Permit/Certification Number:****Date of Issue:****Expiration Date:**

31-16-0067-29

AO16-167884

October 17, 1989

September 30, 1994

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 Sections 403.141, 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 this 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 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 and 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 reasonable times, 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 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 non-compliance, 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

L.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

31-16-0067-29
AO16-167884
October 17, 1989
September 30, 1994

9. In accepting this permit, the permittee understands and agrees that all reports, 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 403.11 and 403.73, 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 Statute or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rules 17-4.120 and 17-30.300, FAC 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. This permit also constitutes:
- Determination of Best Available Control Technology (BACT)
 - Determination of Prevention of Significant Deterioration (PSD)
 - Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - Compliance with New Source Performance Standards
14. 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 recording for continuous monitoring instrumentation), required by this permit, copies of all reports required by the 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 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.

Permittee:

Seminole Kraft Corporation

LD. Number:**Permit/Certification Number:****Date of Issue:****Expiration Date:**

31-16-0067-29

AO16-167884

October 17, 1989

September 30, 1994

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) at least fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)9., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
5. TRS emission control equipment shall be provided with a method of access that is safe and readily accessible. Stack sampling ports and platforms shall not be required.
6. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
7. The following pollutant(s) shall be tested at intervals indicated from the date of January 1, 1986:

<u>Pt. No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
29	TRS	Upon Request	EPA Reference Method 16 or 16A

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</u>	<u>Other</u>
29	TRS	17-2.600(4)(c)1.	2.202	

9. 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>
29	TRS			*20 ppm

*As measured in emissions from Lime Kiln No. 2 or No. 3

10. Operation of MEE No. 3 shall be limited to 8760 hours per year.
11. The maximum permitted capacity shall be limited to 450,000 pounds per hour of weak black liquor at 15% solids.

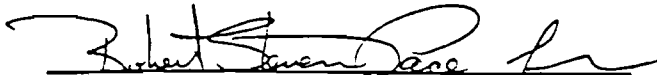
Permittee:
Seminole Kraft Corporation

L.D. Number:
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October 17, 1989
September 30, 1994

12. The permittee shall minimize TRS emission from MEE No. 3 by:
 - A. Maintaining evaporator ductwork to minimize air infiltration.
 - B. Properly operating cooling towers.
13. The permittee shall vent TRS emissions only in accordance with Rule 17-2.600(4)(c)1.c., FAC.
14. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit in accordance with Rule 17-4.090, FAC. Failure to submit a renewal application sixty (60) days prior to the expiration date shall result in the assessment of a penalty in accordance with Section 360.701(a)19., Ordinance Code.

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services


James L. Manning, P.E., Deputy Director

State of Florida
Department of Environmental Regulation


Ernest E. Frey, Deputy Assistant Secretary

- 1 Florida Administrative Code
- 2 Jacksonville Environmental Protection Board



Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

September 28, 1992

FDER
Bruce Mitchell
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RESO
Wayne Walker
421 West Church Street
Suite - 412
Jacksonville, FL 32202

RE: Emission Credits

Supporting reports containing the data submitted with our request for emission credits are enclosed. They are:

- Attachment 1 Annual Operating Report for 1990
- Attachment 2 Annual Operating Report for 1991
- Attachment 3 Emissions Test Report prepared by Industrial and Environmental Analysts, Inc.
Dated February 28, 1991
- Attachment 4 Source Test Report for SO₂ Emissions by Air Consulting and Engineering, Inc.
Dated March 27, 1989
- Attachment 5 Source Test Report for SO₂ Emissions by Air Consulting and Engineering, Inc.
Dated March 27-28, 1989
- Attachment 6 Source Emissions Test for SO₂ Technical Services, Inc.
Dated August 30- September 2, 1989

September 28, 1992
Page 2

Attachment 7 Source Emissions Test Report for Oxides of
Nitrogen, Technical Services, Inc.
Dated February 20-21, 1992

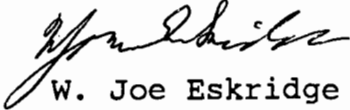
Attachment 8 National Council of The Paper Industry for Air and
Stream Improvement, Inc. (NCASI) Technical
Bulletin No. 358
Dated September, 1981

Table I is revised to indicate the source of each number.

The hours of operation are listed in Table II and the production
of air dried pulp are listed in Table III.

Should you have any further questions, please call me at
(904) 751-6400 ext. 279.

Sincerely,



W. Joe Eskridge

WJE/pjw

attachments

JE34

TABLE I - AVERAGE TONS/YEAR

	Carbon Monoxide (CO)	Particulate Matter (PM) (c)	Sulfur Dioxide (SO ₂)	Nitrogen Oxides (NO _x) (e)	Volatile Organic Compounds (VOC)	Total Reduced Sulfur (TRS) (c)	Sulfuric Acid (H ₂ SO ₄) (a)
Recovery Boiler 1	1141 (a)	108	4 (a)	120	114 (a)	7	10
Recovery Boiler 2	1173 (a)	156	3 (a)	129	193 (a)	12	20
Recovery Boiler 3	481 (a)	130	1 (a)	143	38 (a)	14	14
Lime Kiln 1	1 (b)	4	-	7	2 (f)	-	-
Lime Kiln 2	11 (b)	22	9 (d)	41	19 (f)	2	-
Lime Kiln 3	10 (b)	20	9 (d)	60	19 (f)	1	-
Smelt Dissolving Tank 1	-	23	2 (b)	-	-	1	-
Smelt Dissolving Tank 2	-	24	3 (b)	-	-	2	-
Smelt Dissolving Tank 3	-	37	3 (b)	-	-	2	-
Slaker 3	-	1	-	-	-	-	-
TOTAL	2817	525	34	500	385	41	44

- (a) = Emission test report by IEA Inc. (Attachment 3)
- (b) = AP-42 factors used due to lack of actual data
- (c) = Annual Operating Reports for 1990 and 1991 (Attachments 1 & 2)
- (d) = SO₂ Source Test Reports by TSI and ACE (Attachments 4, 5, 6)
- (e) = NO_x Test Report by TSI (Attachment 7)
- (f) = NCASI information (Attachment 8)

DO NOT USE!!

Updated Table rec'd:

10/22/92

Check Sheet

Company Name: Seminole Craft Corporation
Permit Number: AC 16-208332 - 333
PSD Number: _____
Permit Engineer: _____

Application:

- | | |
|--|--------------------------|
| <input type="checkbox"/> Initial Application | Cross References: |
| <input type="checkbox"/> Incompleteness Letters | <input type="checkbox"/> |
| <input type="checkbox"/> Responses | <input type="checkbox"/> |
| <input type="checkbox"/> Waiver of Department Action | <input type="checkbox"/> |
| <input type="checkbox"/> Department Response | |
| <input type="checkbox"/> Other | |

Intent:

- Intent to Issue
 - Notice of Intent to Issue
 - Technical Evaluation
 - BACT or LAER Determination
 - Unsigned Permit
- Correspondence with:
- EPA
 - Park Services
 - Other
- Proof of Publication
 - Petitions - (Related to extensions, hearings, etc.)
 - Waiver of Department Action
 - Other

Final

Determination:

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

P 062 921 908



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Mr. L. A. Stanley	
Street and No.	
9469 Eastport Rd	
P.O., State and ZIP Code	
Jacksnville, Fla	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	11-3-92
AC 16-208322	
" " " 323	

PS Form 3800, June 1991

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:

Mr. L. A. Stanley
Seminole Kraft Corporation
9469 Eastport Road
Jacksnville, Fla 32229

4. Type of Service:

Registered Insured
 Certified COD
 Express Mail

Article Number
P062921908

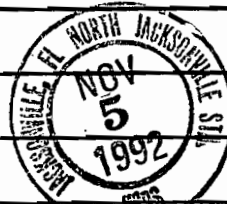
Always obtain signature of addressee or agent and **DATE DELIVERED.**

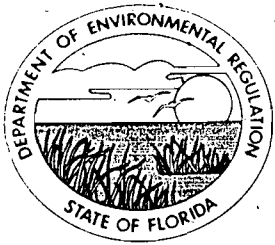
5. Signature - Addressee
X

6. Signature - Agent
X *Stanley*

7. Date of Delivery
NOV 5 1992

8. Addressee's Address (ONLY if requested and fee paid)





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;

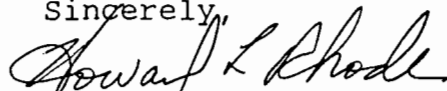
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(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

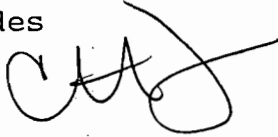
TC/kp
Attachment: \$100.00
cc: Bruce Mitchell
Jeff Braswell
Larry Stanley
Mike Riddle
Craig Hurd



State of Florida
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: November 2, 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

File Copy

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
KENNETH G. OERTEL
HAROLD F. X. PURNELL
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)

August 21, 1992

RECEIVED

AUG 24 1992

Division of Air
Resources Management

Mr. Jeff Braswell
Assistant General Counsel
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Seminole Kraft Corporation Permit No. AC 16-208322

Dear Mr. Braswell:

Based upon the fact that no timely response to the Order of the Department of Environmental Regulation was filed by Mr. McCranie, it would be appreciated if you could arrange with the Air Division for the final permit to be issued as soon as possible.

It is important to Seminole Kraft that this permit be issued as soon as possible, since it is affiliated with the new recycle facility that is in the process of starting up, and with both lines of the recycle facility about to begin full operation, this will prevent unnecessary and valuable materials from going to the landfill.

We appreciate your courtesy in checking to see if any petitions have been filed and if we can assist in any way to expedite the issuance of the final permit, we would be glad to do so.

Sincerely,

Terry Cole
Terry Cole

TC/kp

cc: Bruce Mitchell
Larry Stanley
Craig Hurd

A. Kutyna, NED }
R. Roberson, OCAQD }
B. Mitchell }
CHF/PL } 8-24-92 RR

8-24-92

~~CHP~~

Ph ~~Spe~~

FYI. Please review,
initial, and return to
Patty for billing.

Janis
Bun

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

WILLIAM MARK MCCRANIE,

Petitioner,

vs.

OGC CASE NOS. 92-1285
92-1286

SEMINOLE KRAFT CORPORATION,
and
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION,

Respondents.

ORDER DISMISSING PETITION WITH LEAVE TO AMEND

On July 15, 1992, the State of Florida Department of Environmental Regulation ("Department"), received a Petition that could be considered as a request for administrative hearing from Petitioner, William Mark McCranie (Exhibit 1).

The Petitioner challenged the Department's decisions to issue Permit No. AC 16-208322 to modify the existing No. 1 Bark Boiler and to issue Permit No. AC 16-208323 to modify the existing No. 2 Bark Boiler, in Duval County, and to establish in each permit a federally enforceable permit condition to define the sources as cofired combustors pursuant to 40 CFR 60.51a (July 1991 version).

Petitioner states that he received notice of the Department's action on June 30, 1992 see Exhibit 2. Florida Administrative Code Rule 17-103.155 and the Department's notice to Petitioner require that persons whose substantial interests are affected by the agency's decision must file a petition for an administrative

determination (hearing) in the Department's Office of General Counsel within fourteen days of publication of notice or receipt of notice, whichever occurs first.

Rule 17-103.155(3)(b) provides:

(b) Failure to timely file a petition within the applicable time period after receipt of notice of agency action or receipt of notice of proposed agency action, whichever notice first occurs, shall constitute a waiver of any right to request an administrative proceeding under Chapter 120, Florida Statutes.

The Department received the Verified Petition For A Formal Hearing Pursuant to Section 120.57, Florida Statutes, on July 15, 1992, which is one day late in filing.

Petitioner's failure to timely file constitutes a waiver of his right to request an administrative proceeding under Rule 17-103.155 and Chapter 120, Florida Statutes.

Therefore,

IT IS ORDERED:

The petition for hearing filed by William Mark McCranie is hereby DISMISSED.

Such dismissal is without prejudice to William Mark McCranie to amend his petition to show why it should be considered timely.

The amended petition must be filed (received) in the Office of General Counsel, Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 within fifteen days from the date set forth in the Certificate of Service on the last page of this Order. This Order constitutes final agency action of the Department unless a timely amended petition is filed in conformance with this Order.

Any party to this Order has the right to seek judicial review of the Order 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 Order is filed with the clerk of the Department.

DONE AND ORDERED this 5 day of August, 1992, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk 8-6-92
Date


for CAROL M. BROWNER
Secretary

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-4805

CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing has been mailed to:

William Mark McCranie
1400 Bretta Street
Jacksonville, Florida 32211

Mr. Larry Stanley
Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218

Mr. Terry Cole
OERTEL, HOFFMAN, FERNANDEZ
& COLE P.A.
Post Office Box 6507
Tallahassee, Florida 32314

on this 6th day of August, 1992.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



JEFFERSON M. BRASWELL
Assistant General Counsel
Florida Bar No. 800996

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-9730



Seminole Kraft Corporation

Jacksonville Mill

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

July 16, 1992

904 751-6400

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:

Attached is the certified notice of publication of the legal notice concerning the bark boiler modification.

As you will recall, I gave you the page from the paper containing the notice on July 7, 1992 during the workshop on air emission fees.

Should there be any questions please call.

Sincerely,

W. Joe Eskridge
Environmental Engineer

pc

attachment

RECEIVED

JUL 17 1992

Division of Air
Resources Management

JUL 16 1992

FLORIDA PUBLISHING COMPANY
Publisher
JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared _____

Janie Likens _____ who on oath says that he is

Legal Ad Rep _____ of The Florida Times-Union

a daily newspaper published at Jacksonville in Duval County, Florida; that the
attached copy of advertisement, being a _____ Legal Notice

in the matter of _____ Notice of Intent to Issue

in the _____ Court,

was published in THE FLORIDA TIMES-UNION in the issues of _____
June 30, 1992

Affiant further says that the said The Florida Times-Union is a newspaper published at Jacksonville, in said Duval County, Florida, and that the said newspaper has heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, 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 preceeding 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 _____ 09 _____ day of

July _____ A.D. 19 92
Mary A. Walsh
Notary Public,
State of Florida at Large.

Janie Likens

My Commission Expires _____
Notary Public, State of Florida
My Commission Expires Feb. 7, 1994
Bonded Third Party Insurance Inc.

DA 444

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 co-fired 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.

Extra Copy

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

WILLIAM MARK McCRANIE,

Petitioner,

vs.

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

SEMINOLE KRAFT CORPORATION,
and STATE OF FLORIDA,
DEPARTMENT OF ENVIRONMENTAL
REGULATION,

RECEIVED
JUL 17 1992

Respondents.

Dept. of Environmental Reg
Office of General Counsel

**MOTION TO DISMISS
AND REQUEST FOR FINAL ISSUANCE OF MODIFIED PERMITS**

Respondent, Seminole Kraft Corporation, by and through the undersigned attorneys and pursuant to the authorities cited herein, move to dismiss with prejudice the Verified Petition for Formal Hearing filed by William Mark McCranie, and requests issuance of the modified permits referenced hererin, and as grounds therefor states as follows:

1. On June 24, 1992, the Department of Environmental Regulation (DER) issued an Intent to Issue modified permits to Seminole Kraft Corporation (Seminole) under DER File Nos. AC 16-208322, and 23 (Exhibit "A"). The modified permits will enable the Seminole Kraft Paper Mill in Jacksonville, Florida to utilize its existing Nos. 1 and 2 Bark Boilers to burn recycled fiber rejects and the fiber bail's plastic strapping and wrapping as part of Seminoles conversion to a recycled papermaking operation.

2. As required by DER rules, on June 30, 1992, Seminole caused to be published in the Jacksonville Times Union, a newspaper of general circulation in the area where the project is to be implemented, a Notice of Intent to Issue. This appeared in the Legal Notice Section (Exhibit "B"). The published Notice of Intent to Issue was in the form provided by DER and as required by Fla. Admin. Code Rule 17-103.150(2)d. On July 7, 1992, a copy of the published notice as it appeared in the Florida Times Union Tuesday, June 30, 1992 edition was hand delivered to the Department. On July 16, 1992, the Department was served with official notification by letter of Seminole's compliance with its publication responsibilities concerning the Notice of Intent to Issue (Exhibit "C").

3. On July 15, 1992, the Petitioner, William Mark McCranie, filed a Verified Petition for a Formal Hearing Pursuant to Section 120.57, Florida Statutes, challenging DER's issuance of the above-referenced permit modifications (Exhibit "D"). At paragraph 6 the Petition reflects that Mr. McCranie received notice of DER's Intent to Issue the Seminole Kraft permit modifications on June 30, 1992, through the published notice in the Florida Times Union newspaper. The Petition certificate of service also reflects that the verified Petition was merely mailed to DER on July 14, 1992.

4. DER's Rule 17-103.155(3)a.1. requires that petitions "must be filed (received) in the Office of General Counsel of the Department within the following number of days after receipt or publication (whichever occurs first) of notice of proposed agency action or of notice of agency action:

1. Petitions concerning Department action will propose action on applications for permits . . . : 14 days . . . "

[Emphasis added]. DER's Rule 17-103.155(3)b further provides as follows:

Failure to timely file a petition within the applicable time period after receipt of notice of agency action or receipt of notice of proposed agency action, whichever notice first occurs, shall constitute a waiver of any right to request an administrative proceeding under Chapter 120, F.S.

[Emphasis added].

5. The Verified Petition was not timely filed as it was filed and received by DER more than fourteen (14) days after publication of the Notice of Intent to Issue. By operation of Rule 17-103.155(2)b Mr. McCranie has waived any right to request an administrative proceeding pursuant to Section 120.57, Florida Statutes, to challenge DER's issuance of the requested permit modifications.

6. In addition to the above, Rule 17-103.155(2)e, F.A.C., requires that petitions filed with DER set forth "[a] a statement of facts which Petitioner contends warrant reversal or modification of the Department's action or proposed action."

7. A brief reading of Mr. McCranie's Petition reveals that it does not contain such a statement. Indeed, even upon a more detailed review it is impossible to discern those facts which McCranie contends warrant denial of the requested permit modifications. Therefore, even had the Verified Petition been timely filed, which it was not, it is legally insufficient and must be dismissed.

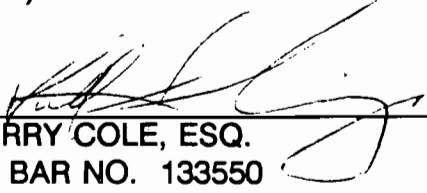
8. Because no timely petition was filed challenging DER's intended issuance of the requested permit modifications, Seminole respectfully requests that DER dismiss with prejudice the Verified Petition and issue the modified permits.

WHEREFORE, Seminole Kraft Corporation respectfully requests that the Department of Environmental Regulation enter an Order dismissing with prejudice the

Verified Petition for Formal Hearing pursuant to Section 120.57, Florida Statutes, and further, issue modified permit Nos. AC 16-208322 and 23.

Respectfully submitted,

OERTEL, HOFFMAN, FERNANDEZ
& COLE, P.A.
2700 Blair Stone Road, Suite C
Post Office Box 6507
Tallahassee, Florida 32314-6507
(904) 877-0099



TERRY COLE, ESQ.
FL BAR NO. 133550
SCOTT SHIRLEY, ESQ.
FL BAR NO. 547158

Attorneys for Seminole Kraft Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of the foregoing has been furnished by **HAND DELIVERY** to the Office of General Counsel, State of Florida, Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida and **DAN THOMPSON, General Counsel, State of Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida** and by **U.S. MAIL** to **WILLIAM MARK McCRANIE, 1400 Bretta Street, Jacksonville, Florida 32211** and **LARRY STANLEY, Seminole Kraft Corporation, Post Office Box 26998, Jacksonville, Florida 32218** this 17th day of **July, 1992**.



ATTORNEY

WORK:MCCRANIE.PET\99



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

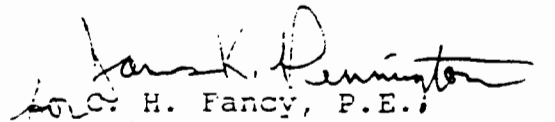
Mr. L. A. Stanley
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

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,


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

CHF/BM/bm

Attachments

- C: A. Kutyna, NE District
- E. 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

Recycled Paper

EXHIBIT "A"

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

James K. Pennington
for 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.

Ken Jaker
Ken Jaker
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: 1-02-004-01 10³ 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

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

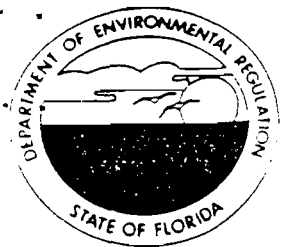
Based on a technical review, an air quality analysis was not required.

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.

J. J. [Signature]
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 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. 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

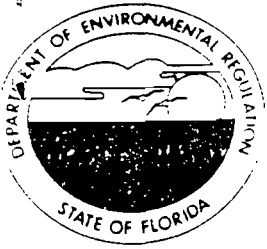
Permit Number: AC 16-208322
Expiration Date: December 31, 1992

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 Tower 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

FLORIDA TIMES-UNION
TUESDAY, JUNE 30, 1992

State of Florida Department
of Environmental Regulation
Notice of Intent to Issue
AC 16-20322: No. 1 Bark Boiler
AC 15-20323: No. 2 Bark Boiler

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Semihole 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.



Seminole Kraft Corporation

Jacksonville Mill

9489 Eastport Road
P.O. Box 26998
Jacksonville, Florida 32218-0998

July 16, 1992

904 751-6400

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:

Attached is the certified notice of publication of the legal notice concerning the bark boiler modification.

As you will recall, I gave you the page from the paper containing the notice on July 7, 1992 during the workshop on air emission fees.

Should there be any questions please call.

Sincerely,

W. Joe Eskridge
Environmental Engineer

pc

attachment

Scott Shirley - 3 pages

JUL 16 1992

FLORIDA PUBLISHING COMPANY
Publisher
JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA
COUNTY OF DUVAL

Before the undersigned authority personally appeared

Janis Likens

who on oath says that he is

Legal Ad Rep

of The Florida Times-Union

a daily newspaper published at Jacksonville in Duval County, Florida; that the
attached copy of advertisement, being a Legal Notice

in the matter of Notice of Intent to Issue

in the Court

was published in THE FLORIDA TIMES-UNION in the issues of

June 30, 1992

Affiant further says that the said The Florida Times-Union is a newspaper published at Jacksonville, in
said Duval County, Florida, and that the said newspaper has heretofore been continuously published in
said Duval County, Florida, The Florida Times-Union each day, 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 09 day of

July 19 92
Notary Public,
State of Florida at Large.

Handwritten signature of Janis Likens

My Commission Expires
Notary Public, State of Florida
Commission Expires Feb. 7, 1994
DA 444

Department of Environmental Regulation
Notice of Intent to Issue
AC 16-30000; No. 1 Berk Boiler
The Department of Environmental Regulation has
served notice of its intent to issue permit to
Kurtz Corporation, 1401 East 10th Road, Jack
sonville, Duval County, Florida 32209, to install a
boiler (No. 1 and 2 Berk Boilers) (12,700 Btu/hr)
to establish a heating system for the
boiler room condition to define the source of
noise consistent pursuant to 40 CFR 50.51a (July
1991 version). A determination of Best Available
Control Technology (BACT) was not required. The
Department is hereby giving notice of its intent to issue for the
boiler room condition.
Person whose substantial interests are affected
by the Department's proposed administrative decision
may petition for an administrative proceeding
under 40 CFR 50.51a. The petition must contain the
following information:
(a) A statement of how and when each petitioner's
substantial interests are affected by the Department's
action or proposed action;
(b) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(c) A statement of the material facts discussed in
the notice of intent;
(d) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(e) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(f) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(g) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(h) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(i) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(j) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(k) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(l) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(m) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(n) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(o) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(p) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(q) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(r) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(s) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(t) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(u) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(v) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(w) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(x) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(y) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action;
(z) A statement of how each petitioner's substantial
interests are affected by the Department's action or
proposed action.

CCPN

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

WILLIAM MARK McCRANIE,)
)
 Petitioner,)
)
)
)
)
 SEMINOLE KRAFT CORPORATION,)
 and STATE OF FLORIDA,)
 DEPARTMENT OF ENVIRONMENTAL)
 REGULATION,)
)
 Respondents.)

RECEIVED
 JUL 15 1992
 Dept. of Environmental Reg
 Office of General Counsel

VERIFIED PETITION FOR A FORMAL HEARING
PURSUANT TO SECTION 120.57, FLORIDA STATUTES

Petitioner, WILLIAM MARK McCRANIE, files this Verified Petition for a Formal Hearing pursuant to Section 120.57, Florida Statutes, and Rules 17-2, 17-4, 17-103, 22I-6, and 28-5, Florida Administrative Code, and 40 CFR 60 (Code of Federal Regulations).

1. Petitioner, WILLIAM MARK McCRANIE, lives in Duval County, at 1400 Bretta Street, Jacksonville, Florida 32211, and his telephone number is (904) 743-9027.

2. Respondent, Seminole Kraft Corporation, is the permit applicant for DER Permit Numbers AC 16-208322 and AC 16-208323. The permits are sought for modifications to the No. 1 and No. 2 Bark Boilers at the Seminole Kraft Corporations' kraft mill in Jacksonville, Florida. Respondent's address is 9469 Eastport Road, Jacksonville, Florida 32229.

3. The agency affected in this proceeding is the State of Florida, Department of Environmental Regulation, ("DER"), 2600 Blair Stone Road, Tallahassee, Florida 32399. The DER Permit Numbers are AC 16-208322 and AC 16-208323.

4. By Notice of Intent to Issue, dated on or about June 30, 1992, the DER proposes to issue two permits to the Seminole Kraft Corporation for air construction permits which have two effects. First, to modify the existing No. 1 and No. 2 Bark Boilers, and second, to establish a federally enforceable permit condition to define the sources as cofired combustors, pursuant to 40 CFR 60.51a (July, 1991 version).

5. Petitioner, WILLIAM MARK McCRANIE, alleges that the existing kraft mill plant operated by Seminole Kraft Corporation, and the proposed modified Bark Boilers, do now have the effect, and will have the effect, of impairing, polluting, or otherwise injuring the air, water, or other natural resources of the State of Florida.

6. The Petitioner received notice of DER's Intent to Issue the Seminole Kraft Corporations' permits on or about June 30, 1992, by reading the Florida-Times Union newspaper.

7. The following are the Petitioner's substantial interests affected by the DER's proposed actions: Petitioner's interest in the unimpaired and unpolluted air, water, and other natural resources of the State of Florida; and by my frequent travels through the area of Jacksonville affected by the operations of the Seminole Kraft plant; and my residence in the Arlington-area of Jacksonville, an area frequently affected by odors and emissions from the plant.

BEST AVAILABLE COPY

8. The following are the disputed issues of fact:

(a) Whether the actual and/or potential pollutant emissions associated with the No. 1 and No. 2 Bark Boilers (hereinafter collectively called "the Source") will cause an anticipated increase in pollutant emissions; and

(b) Whether Respondent, Seminole Kraft, is legally bound and obligated to eliminate Total Reduced Sulfur emissions from all existing, regulated sources at their kraft paper mill by September 12, 1992; and

(c) Whether Respondent, Seminole Kraft, is legally bound and obligated to replace the power and bark boilers at their kraft paper mill with a new power system meeting New Source Performance Standards (NSPS); and

(d) Whether Respondent has been cited twenty-five times for environmental violations between May 5, 1987, and December 30, 1991, including, but not limited to, particulate matter exceedances, objectionable odors, and emission exceedances of Total Reduced Sulfur (TRS); and

(e) Whether Respondent was indicted for annoying odors, which did annoy the community or injure the health of the citizens, on or about June 14, 1988; and

(f) Whether Emissions Limitations and Air Quality Analyses of the Source have been observed and performed; and

(g) Whether control equipment will be provided with a method of access which is safe and readily accessible, in accordance with Specific Condition Five of the intended DER permits; and

8. Disputed issues of fact (continued):

(h) Whether Respondent, Seminole Kraft, has performed the following actions:

- (1) Commenced construction on the first recycle fibre line no later than March 1, 1991, and
- (2) Started-up the first recycle fiber processing line no later than June 1, 1992, and
- (3) Will shut down the old pulp mill no later than September 12, 1992.

(i) Whether Respondent causes or contributes to objectionable odor in violation of Chapter 376 of the Jacksonville Ordinance Code; and

(j) Whether DER has reasonable, independently obtained, assurances that the Source will not cause or contribute to a violation of any air quality standard; and

(k) Whether the plastic component (i.e., bale bindings) of the total fuel feed into each boiler shall be limited to three per cent or less by weight, on a twenty-four hour daily basis; and

(l) Whether Respondent has met all of the requirements of the Consent Order into which it entered on or about June 7, 1989, especially whether Respondent undertook and performed all of the actions called for in the Consent Order with respect to Bark Boiler No. 1; and

(m) Whether the monitoring features, control mechanisms, and operating procedures of the Source are adequate to insure that air quality standards will not be violated by the Source or by the Respondent; and

8. Disputed issues of fact (continued):

(n) Whether the Source, in its existing form, and in its modified form, adversely affect the public health, safety or welfare, or the property of others in the vicinity of the Respondent's kraft plant; and

(o) Whether Respondent was ever cited by the United States Department of Labor, Occupational Safety and Health Administration, on or about December 9, 1991, for violations of the Occupational Safety and Health Act of 1970, and whether any contractor of Respondent has ever been so cited; and

(p) Whether Respondent did remove, or have caused to be removed, asbestos containing material from its plant, in violation of the laws of the State of Florida; and

(q) Whether notification of asbestos removal projects at Respondent's plant were properly made to the City of Jacksonville's Regulatory and Environmental Service Division after August, 1988, and were continued until June, 1991; and

(r) Whether any person, agent or contractor, acting on behalf of Respondent, or under contract to Respondent, ever took substantial amounts of asbestos to the North Landfill of the City of Jacksonville in 1988, 1989, 1990, and 1991; and

(s) Whether Respondent, Seminole Kraft Corporation, can account for the approximately 180 tons of asbestos waste which were reported by the RESD of the City of Jacksonville to have been removed from its plant.

9. Petitioner is entitled to relief pursuant to Chapter 120 of Florida Statutes and pursuant to Chapter 17-4 of the Florida Administrative Code.

10. Section 403.412(5), Florida Statutes, provides that a citizen of the State shall have standing to intervene as a party in a permitting proceeding on the filing of a verified petition asserting that the activity to be permitted has or will have the effect of impairing, polluting, or otherwise injuring the air, water, or other natural resources of the State. Under this provision, a citizen is entitled to initiate a proceeding, under Section 120.57, Florida Statutes, to contest a proposed agency permitting action.

11. Petitioner respectfully requests that the applications for DER permits # AC 16-208322 and -208323 be denied.

WHEREFORE, Petitioner respectfully requests that this matter be referred to a hearing officer of the Division of Administrative Hearings for the commencement of formal proceedings pursuant to Section 120.57, Florida Statutes; that the hearing officer issue a recommended order recommending that the permit application be denied, and providing other relief, including that the DER issue a final order denying both Permit Numbers AC 16-208322 and AC 16-208323.

Respectfully submitted this 14th day of July, 1992.



William Mark McCranie
1400 Bretta St., Jacksonville
Fla. 32211 (904) 743-9027

VERIFICATION

STATE OF FLORIDA
COUNTY OF DUVAL

BEFORE ME the undersigned authority personally appeared, WILLIAM MARK McCRANIE, who, being by me first duly sworn, states the following:

1. Florida Statutes, Section 403, provides that any citizen of the State is entitled to intervene in any on-going environmental permitting proceeding upon the filing of a verified petition asserting that the proposed activity will impair or pollute the natural resources of the State. Under this provision, a citizen is entitled to initiate a Section 120.57, Florida Statutes, proceeding to contest a proposed agency permit action. William Mark McCranie is a citizen of the State of Florida.

2. That he believes and asserts that the activity proposed for permitting in this proceeding will have the effect of impairing, polluting or otherwise injuring the air, water, and other natural resources of the State.

3. That the facts alleged in the foregoing Petition are true and correct to the best of his knowledge and belief.

FURTHER AFFIANT SAYETH NOT.

 William Mark McCranie

Sworn and Subscribed before

me this 14th day of July, 1992.

NOTARY PUBLIC, STATE OF FLORIDA
My Commission Expires Nov. 13, 1993

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of the foregoing Verified Petition have been furnished by U.S. Mail for filing to the Office of the General Counsel, State of Florida, Department of Environmental Regulation, at 2600 Blair Stone Road, Tallahassee, Florida 32399, this 14th day of July, 1992.

William Mark McCranie

William Mark McCranie

I HEREBY CERTIFY that one copy of the foregoing Verified Petition has been furnished by U. S. Mail to the following:

- A. Mr. Larry Stanley
Seminole Kraft Corporation
P. O. Box 26998
Jacksonville, Florida 32218
- B. Mr. Terry Cole
Oertel, Hoffman, et al
P. O. Box 6507
Tallahassee, Florida 32314
- C. Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, Florida 32399

William Mark McCranie

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

WILLIAM MARK McCRANIE,)
)
Petitioner,)
)
vs.)
)
SEMINOLE KRAFT CORPORATION,)
and STATE OF FLORIDA,)
DEPARTMENT OF ENVIRONMENTAL)
REGULATION,)
)
Respondents.)

RECEIVED
JUL 15 1992

Dept. of Environmental Reg
Office of General Counsel

VERIFIED PETITION FOR A FORMAL HEARING
PURSUANT TO SECTION 120.57, FLORIDA STATUTES

Petitioner, WILLIAM MARK McCRANIE, files this Verified Petition for a Formal Hearing pursuant to Section 120.57, Florida Statutes, and Rules 17-2, 17-4, 17-103, 22I-6, and 28-5, Florida Administrative Code, and 40 CFR 60 (Code of Federal Regulations).

1. Petitioner, WILLIAM MARK McCRANIE, lives in Duval County, at 1400 Bretta Street, Jacksonville, Florida 32211, and his telephone number is (904) 743-9027.

2. Respondent, Seminole Kraft Corporation, is the permit applicant for DER Permit Numbers AC 16-208322 and AC 16-208323. The permits are sought for modifications to the No. 1 and No. 2 Bark Boilers at the Seminole Kraft Corporations' kraft mill in Jacksonville, Florida. Respondent's address is 9469 Eastport Road, Jacksonville, Florida 32229.

3. The agency affected in this proceeding is the State of Florida, Department of Environmental Regulation, ("DER"), 2600 Blair Stone Road, Tallahassee, Florida 32399. The DER Permit Numbers are AC 16-208322 and AC 16-208323.

4. By Notice of Intent to Issue, dated on or about June 30, 1992, the DER proposes to issue two permits to the Seminole Kraft Corporation for air construction permits which have two effects. First, to modify the existing No. 1 and No. 2 Bark Boilers, and second, to establish a federally enforceable permit condition to define the sources as cofired combustors, pursuant to 40 CFR 60.51a (July, 1991 version).

5. Petitioner, WILLIAM MARK McCRANIE, alleges that the existing kraft mill plant operated by Seminole Kraft Corporation, and the proposed modified Bark Boilers, do now have the effect, and will have the effect, of impairing, polluting, or otherwise injuring the air, water, or other natural resources of the State of Florida.

6. The Petitioner received notice of DER's Intent to Issue the Seminole Kraft Corporations' permits on or about June 30, 1992, by reading the Florida-Times Union newspaper.

7. The following are the Petitioner's substantial interests affected by the DER's proposed actions: Petitioner's interest in the unimpaired and unpolluted air, water, and other natural resources of the State of Florida; and by my frequent travels through the area of Jacksonville affected by the operations of the Seminole Kraft plant; and my residence in the Arlington-area of Jacksonville, an area frequently affected by odors and emissions from the plant.

8. The following are the disputed issues of fact:

(a) Whether the actual and/or potential pollutant emissions associated with the No. 1 and No. 2 Bark Boilers (hereinafter collectively called "the Source") will cause no anticipated increase in pollutant emissions; and

(b) Whether Respondent, Seminole Kraft, is legally bound and obligated to eliminate Total Reduced Sulfur emissions from all existing, regulated sources at their kraft paper mill by September 12, 1992; and

(c) Whether Respondent, Seminole Kraft, is legally bound and obligated to replace the power and bark boilers at their kraft paper mill with a new power system meeting New Source Performance Standards (NSPS); and

(d) Whether Respondent has been cited twenty-five times for environmental violations between May 5, 1987, and December 30, 1991, including, but not limited to, particulate matter exceedances, objectionable odors, and emission exceedances of Total Reduced Sulfur (TRS); and

(e) Whether Respondent was indicted for annoying odors, which did annoy the community or injure the health of the citizens, on or about June 14, 1988; and

(f) Whether Emissions Limitations and Air Quality Analyses of the Source have been observed and performed; and

(g) Whether control equipment will be provided with a method of access which is safe and readily accessible, in accordance with Specific Condition Five of the intended DER permits; and

8. Disputed issues of fact (continued):

(h) Whether Respondent, Seminole Kraft, has performed the following actions:

- (1) Commenced construction on the first recycle fibre line no later than March 1, 1991, and
- (2) Started-up the first recycle fiber processing line no later than June 1, 1992, and
- (3) Will shut down the old pulp mill no later than September 12, 1992.

(i) Whether Respondent causes or contributes to objectionable odor in violation of Chapter 376 of the Jacksonville Ordinance Code; and

(j) Whether DER has reasonable, independently obtained, assurances that the Source will not cause or contribute to a violation of any air quality standard; and

(k) Whether the plastic component (i.e., bale bindings) of the total fuel feed into each boiler shall be limited to three per cent or less by weight, on a twenty-four hour daily basis; and

(l) Whether Respondent has met all of the requirements of the Consent Order into which it entered on or about June 7, 1989, especially whether Respondent undertook and performed all of the actions called for in the Consent Order with respect to Bark Boiler No. 1; and

(m) Whether the monitoring features, control mechanisms, and operating procedures of the Source are adequate to insure that air quality standards will not be violated by the Source or by the Respondent; and

8. Disputed issues of fact (continued):

(n) Whether the Source, in its existing form, and in its modified form, adversely affect the public health, safety or welfare, or the property of others in the vicinity of the Respondent's kraft plant; and

(o) Whether Respondent was ever cited by the United States Department of Labor, Occupational Safety and Health Administration, on or about December 9, 1991, for violations of the Occupational Safety and Health Act of 1970, and whether any contractor of Respondent has ever been so cited; and

(p) Whether Respondent did remove, or have caused to be removed, asbestos containing material from its plant, in violation of the laws of the State of Florida; and

(q) Whether notification of asbestos removal projects at Respondent's plant were properly made to the City of Jacksonville's Regulatory and Environmental Service Division after August, 1988, and were continued until June, 1991; and

(r) Whether any person, agent or contractor, acting on behalf of Respondent, or under contract to Respondent, ever took substantial amounts of asbestos to the North Landfill of the City of Jacksonville in 1988, 1989, 1990, and 1991; and

(s) Whether Respondent, Seminole Kraft Corporation, can account for the approximately 180 tons of asbestos waste which were reported by the RESD of the City of Jacksonville to have been removed from its plant.

9. Petitioner is entitled to relief pursuant to Chapter 120 of Florida Statutes and pursuant to Chapter 17-4 of the Florida Administrative Code.

10. Section 403.412(5), Florida Statutes, provides that a citizen of the State shall have standing to intervene as a party in a permitting proceeding on the filing of a verified petition asserting that the activity to be permitted has or will have the effect of impairing, polluting, or otherwise injuring the air, water, or other natural resources of the State. Under this provision, a citizen is entitled to initiate a proceeding, under Section 120.57, Florida Statutes, to contest a proposed agency permitting action.

11. Petitioner respectfully requests that the applications for DER permits # AC 16-208322 and -208323 be denied.

WHEREFORE, Petitioner respectfully requests that this matter be referred to a hearing officer of the Division of Administrative Hearings for the commencement of formal proceedings pursuant to Section 120.57, Florida Statutes; that the hearing officer issue a recommended order recommending that the permit application be denied, and providing other relief, including that the DER issue a final order denying both Permit Numbers AC 16-208322 and AC 16-208323.

Respectfully submitted this 14th day of July, 1992.



William Mark McCranie
1400 Bretta St., Jacksonville
Fla. 32211 (904) 743-9027

VERIFICATION

STATE OF FLORIDA
COUNTY OF DUVAL

BEFORE ME the undersigned authority personally appeared, WILLIAM MARK McCRANIE, who, being by me first duly sworn, states the following:

1. Florida Statutes, Section 403, provides that any citizen of the State is entitled to intervene in any on-going environmental permitting proceeding upon the filing of a verified petition asserting that the proposed activity will impair or pollute the natural resources of the State. Under this provision, a citizen is entitled to initiate a Section 120.57, Florida Statutes, proceeding to contest a proposed agency permit action. William Mark McCranie is a citizen of the State of Florida.

2. That he believes and asserts that the activity proposed for permitting in this proceeding will have the effect of impairing, polluting or otherwise injuring the air, water, and other natural resources of the State.

3. That the facts alleged in the foregoing Petition are true and correct to the best of his knowledge and belief.

FURTHER AFFIANT SAYETH NOT.

 William Mark McCranie
Sworn and Subscribed before

me this 14th day of July, 1992.

NOTARY PUBLIC, STATE OF FLORIDA

My Commission Expires Nov. 13, 1993

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of the foregoing Verified Petition have been furnished by U.S. Mail for filing to the Office of the General Counsel, State of Florida, Department of Environmental Regulation, at 2600 Blair Stone Road, Tallahassee, Florida 32399, this 14th day of July, 1992.

William Mark McCranie

William Mark McCranie

I HEREBY CERTIFY that one copy of the foregoing Verified Petition has been furnished by U. S. Mail to the following:

- A. Mr. Larry Stanley
Seminole Kraft Corporation
P. O. Box 26998
Jacksonville, Florida 32218
- B. Mr. Terry Cole
Oertel, Hoffman, et al
P. O. Box 6507
Tallahassee, Florida 32314
- C. Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, Florida 32399

William Mark McCranie

State of Florida Department
of Environmental Regulation
Notice of Intent to Issue
AC 15-223272, No. 1 Bark Boiler
AC 15-223073, No. 2 Bark Boiler

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Seminole Kraft Corporation, 7467 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 oil-fired 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.

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. L. A. Starkey, GM
 Seminole Kraft Corp.
 9469 Eastport Rd
 Jacksonville, FL 32229

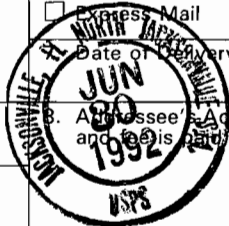
4a. Article Number

P 710 058 492

4b. Service Type

- Registered Insured
- Certified COD
- Express Mail Return Receipt for Merchandise

Date of Delivery



5. Signature (Addressee)

6. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

PS Form 3811, October 1990

U.S. GPO: 1990-273-861

DOMESTIC RETURN RECEIPT

P 710 058 492

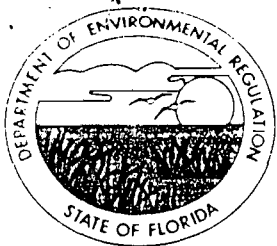


Certified Mail Receipt

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to		L. A. Starkey	
Street & No.		Seminole Kraft Corp	
P.O., State & ZIP Code		Jacksonville, FL	
Postage		\$	
Certified Fee			
Special Delivery Fee			
Restricted Delivery Fee			
Return Receipt Showing to Whom & Date Delivered			
Return Receipt Showing to Whom, Date, & Address of Delivery			
TOTAL Postage & Fees		\$	
Postmark or Date		AC 16-208322 " " 323 6/25/92	

PS Form 3800, June 1990



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 DL

Attachments

- c: A. Kutyna, NE District
- P. 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,

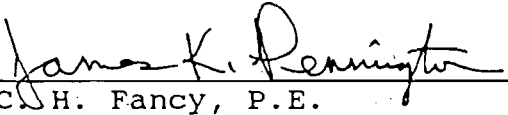
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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

Copies furnished to:

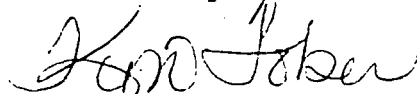
- A. Kutyna, NE District
- R. Roberson, DCAQD
- D. Buff, P.E., KBN
- R. Donelan, Esq., DER
- H. Oven, DER-PPS
- G. Radlinski, Esq., City of Jacksonville
- T. Cole, Esq., OHF&C
- C. Barton, SCC
- C. Hurd, SCC

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: 1-02-004-01 10³ 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

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.

A. Lewis
PE # 41755



WESTON LEWIS
PROFESSIONAL ENGINEER
No. 41755
STATE OF FLORIDA



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 403.067(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 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. 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

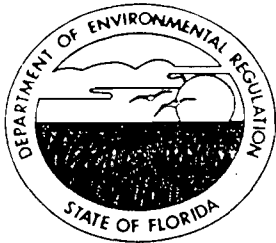
Permit Number: AC 16-208322
Expiration Date: December 31, 1992

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

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTIONS 120.60(2) AND 403.0876, FLORIDA STATUTES

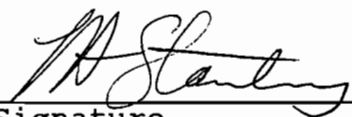
License (Permit, Certification) Application No. AC 16-208322
AC 16-208323

Applicant's Name: Seminole Kraft Corporation

With regard to the above referenced application, the applicant hereby with full knowledge and understanding of applicant's rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed by law. Said waiver is made freely and voluntarily by the applicant, with full knowledge, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 30TH day of JUNE, 1992.

The undersigned is authorized to make this waiver on behalf of the applicant.



Signature

L.A. Stanley, General Manager
Name (Please Type or Print)

RECEIVED
MAY 14 1992
Division of Air
Resources Management

RECEIVED

MAY 11 1992

Division of Air
Resources Management

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTIONS 120.60(2) AND 403.0876, FLORIDA STATUTES


License (Permit, Certification) Application No. AC 16-208322
AC 16-208323

Applicant's Name: Seminole Kraft Corporation

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This waiver shall expire on the 14 day of May, 1992.

The undersigned is authorized to make this waiver on behalf of the applicant.



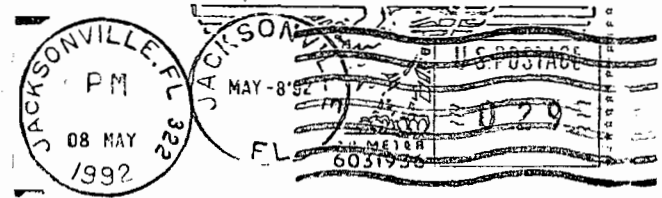
Signature

L.A. Stanley, General Manager
Name (Please Type or Print)

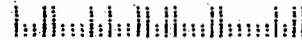


Seminole Kraft Corporation

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



Mr. Clair Fancy
Twin Towers Office Bldg.
2600 Blair Stone Road
Tallahassee, FL 32399





**Seminole
Kraft
Corporation**

Jacksonville Mill

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

(904) 751-6400

Fax Number (904) 757-5172

To:

Clair Jarry

Number of Pages
(Excluding this sheet)

one

Time:

Date:

5-8-92

Location:

Message:

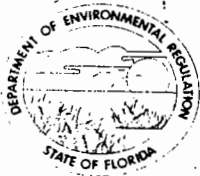
Multiple horizontal lines for message content, currently blank.

From:

Gene Harris

Phone:

(904) 751-6400 ext. 200



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Andy Kutyna, NED
Ron Roberson, DCAQD
Buck Oven, PPC
Richard Donelan, Esq., DER

FROM: Bruce Mitchell, ^{RDW} FDER/DARM/BAR

DATE: April 21, 1992

SUBJ: Draft Language of a Specific Condition for the Proposed Usage of Recycling Fiber Rejects in the Seminole Kraft Corporation's #1 and #2 Bark Boilers

The following draft language of a Specific Condition for the above referenced proposal is offered for your review, edit, etc.:

- o Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component of the total fuel feed into the #1 (#2) Bark Boiler shall be limited to 30 percent or less, by weight, on a 24-hour daily basis. The plastic component of the fuel can only come from what is delivered with the recycled fiber bale(s), as described in Mr. Michael L. Riddle's letter dated November 6, 1991.

The final language will be incorporated into each boiler's permit, which will be a mirror of the existing operation permits plus this condition. Also, the expiration date will coincide with the AES/Cedar Bay project coming on line-any suggestion as to the proposed date or language to be used?!? Please respond ASAP. Thanks!



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Andy Kutyna, NED - EM + hand copy
 Ron Roberson, DCAQD - FAX + hand copy
 Buck Oven, PPC - EM + hand delivery of hand copy
 Richard Donelan, Esq., DER - EM + hand delivery of hand copy
Reading File

} 4-21-92 RM

FROM: Bruce Mitchell, ^{abm} FDER/DARM/BAR

DATE: April 21, 1992

SUBJ: Draft Language of a Specific Condition for the Proposed Usage of Recycling Fiber Rejects in the Seminole Kraft Corporation's #1 and #2 Bark Boilers

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Seminole Kraft Corporation

Jacksonville Mill

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

November 6, 1991

904 751-6400

Mr. Clair Fancy, Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

NOV 12 1991

Bureau of
Air Regulation

Dear Mr. Fancy:

In September you met with Stone Container representatives, Mr. Curt Barton and Mr. Terry Cole, concerning Seminole Kraft Corporation's request to burn recycled fiber rejects in the bark boilers. This request was for the period of time between the mill conversion to recycled fiber operation in the Summer/Fall 1992 and AES Compliance testing (Spring 1994). In a July 23, 1991 letter to Mr. Steve Smallwood, it was stated that the rejects would be less than 25% of the fuel and would not result in the increase of allowable emissions or heat input.

At the meeting you expressed three concerns: 1) Of the estimated 10% plastic content, how much is chlorinated plastic, 2) is there a danger of increased metals emissions from the estimated 15% inorganic portion, and 3) will there be a significant increase in VOC emissions. During the past month, we have initiated several projects to help address these concerns.

Quantity of Chlorinated Plastic

Stone Container's Missoula, Montana mill has a new recycled fiber plant which is similar in operation, reject removal and burning, and raw material feed to the one being constructed at Seminole Kraft. A typical 750 pound bale of recycled fiber was broken open and hand sorted for plastic material. While most of the plastic could not be identified as to original use, nearly all of it fell into one of two categories; strapping or bags. Further, the total 2 1/2 pounds of retrieved plastic (0.3% of the bale weight) was nearly equally divided between the two fractions. These two samples were sent to Galbraith Laboratories for chlorine analyses and the results are included in Appendix I.

The average chlorine content, 190 ppm, is low and is comparable with the chlorine content of bark, 153 ppm, (Appendix II). Total chlorine contribution from the plastic is 190 ppm CH x 0.3% plastic = 0.0001%.



Mr. Clair Fancy, Chief
November 4, 1991
Page 2

Inorganic Fraction of Recycle Rejects

Again, our Missoula, Montana operation was used to provide the necessary data. Samples of actual recycle fiber reject material was taken from the collection bin just prior to burning. The samples were ashed and the results (Appendix III) revealed that the inorganic portion was 1.43% which is much lower than the original estimate of 15% and, in fact, is lower than the inorganic fraction found in bark, 3.4%, (Appendix II). As a second check, a sample of recycle fiber rejects from Stone Container's Florence, South Carolina mill was also ashed. The inorganic portion was found to be 1.23% (Appendix IV) which agrees with the Missoula results. This low ash content is similar to carbonaceous fuels presently being burned in the bark boilers, and indicates there should be no increase in metal emissions resulting from burning recycle fiber rejects.

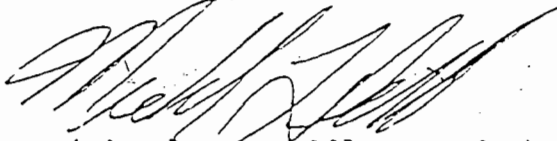
VOC Emissions

As you suggested at the September meeting, the best way of ascertaining that there will be no significant increase in VOC emission is to conduct a VOC stack test before and after the introduction of recycle fiber rejects to the bark boilers. Seminole Kraft agrees to conduct these tests.

Summary

In summary, our projects portray a burnable recycle fiber reject feed containing 98.3% fiber, 1.4% inorganic (sand, glass, etc.) and 0.3% plastic which contained only 190 ppm chlorine. We trust these data adequately answer your concerns and that we have demonstrated that this interim burning of recycle fiber rejects will have no environmental impact.

Sincerely,



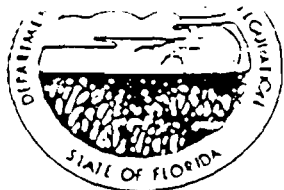
Michael E. Riddle, Technical Director
Craig Hurd, Regional Environmental Manager

/pt

cc: L.A. Stanley
Terry Cole
Curt Barton

CHF/BA/PL
Bruce Mitchell
Andy Kutyna, NED
Ron Robertson, SESD

} 11-12-91 [unclear]



BEST AVAILABLE COPY

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

FAX TRANSMITTAL SHEET

DATE: 4-21-92

NAME(S): Ron Roberson

DEPARTMENT/COMPANY: DCARD

PHONE: SC/986-3666 FAX: 904-630-3638

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 1

FROM: Bruce Mitchell

DEPARTMENT: FDER/OARM/BAR

OFFICE PHONE: 904-488-7344 FAX PHONE: (904)922-6979

SENDER: Sen

COMMENTS: SKC - #1 / #2 BB Specific Condition draft - FYI, ed., etc.

MESSAGE CONFIRMATION:

APP-21-92 TUE 08:04

TELETYPE UNIT OF AIR RES MGMT P-5929

TEL. NO. 904-922-6979

DATE	TIME	TOTAL TIME	DEPT CODE	IN	NO
4-21-92	08:04	00:00	04	00	

Spoke w R. Roberson @ 8:58 a.m.; let him know that I would be sending the attached via FAX. RM



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Andy Kutyna, NED
Ron Roberson, DCAQD
Buck Oven, PPC
Richard Donelan, Esq., DER

FROM: Bruce Mitchell, ^{RM}FDER/DARM/BAR

DATE: April 21, 1992 (2nd edition)

SUBJ: Draft Language of Specific Conditions for the Proposed Usage of Recycling Fiber Rejects in the Seminole Kraft Corporation's #1 and #2 Bark Boilers

The following draft language of Specific Conditions for the above referenced proposal is offered for your review, edit, etc.:

- o Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component of the total fuel feed into the #1 (#2) Bark Boiler shall be limited to 30 percent or less, by weight, on a 24-hour daily basis. The plastic component of the fuel can only come from what is delivered with the recycled fiber bale(s), as described in Mr. Michael L. Riddle's letter dated November 6, 1991.
- o The #1 (#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 #1 (#2) Bark Boiler.

The final language will be incorporated into each boiler's permit, which will be a mirror of the existing operation permits plus these conditions. Please respond ASAP. Thanks!



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

File Copy

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

Interoffice Memorandum

TO: Andy Kutyna, NED - EM / *sent hand copy*
Ron Roberson, DCAQD - FAX'd, *sent hand copy*
Buck Oven, PPC EM / *hand delivered hand copy*
Richard Donelan, Esq., DER EM / *hand delivered hand copy*
Reading File

FROM: Bruce Mitchell, *RAM* FDER/DARM/BAR

DATE: April 21, 1992 (2nd edition)

SUBJ: Draft Language of Specific Conditions for the Proposed Usage of Recycling Fiber Rejects in the Seminole Kraft Corporation's #1 and #2 Bark Boilers

4-21-92 RAM

The following draft language of Specific Conditions for the above referenced proposal is offered for your review, edit, etc.:

- o Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component of the total fuel feed into the #1 (#2) Bark Boiler shall be limited to 30 percent or less, by weight, on a 24-hour daily basis. The plastic component of the fuel can only come from what is delivered with the recycled fiber bale(s), as described in Mr. Michael L. Riddle's letter dated November 6, 1991.
- o The #1 (#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 #1 (#2) Bark Boiler.

The final language will be incorporated into each boiler's permit, which will be a mirror of the existing operation permits plus these conditions. Please respond ASAP. Thanks!



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Andy Kutyna, NED
Ron Roberson, DCAQD
Buck Owen, PPC
Richard Donelan, Esq., DER

FROM: Bruce Mitchell, ^{RAM}FDER/DARM/BAR

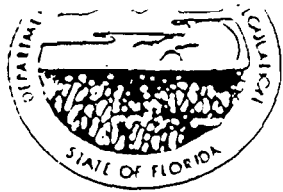
DATE: April 21, 1992 (2nd edition)

SUBJ: Draft Language of Specific Conditions for the Proposed Usage of Recycling Fiber Rejects in the Seminole Kraft Corporation's #1 and #2 Bark Boilers

The following draft language of Specific Conditions for the above referenced proposal is offered for your review, edit, etc.:

- o Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component of the total fuel feed into the #1 (#2) Bark Boiler shall be limited to 30 percent or less, by weight, on a 24-hour daily basis. The plastic component of the fuel can only come from what is delivered with the recycled fiber bale(s), as described in Mr. Michael L. Riddle's letter dated November 6, 1991.
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Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-24

Lawton Chiles, Governor

Carol M. Browner, Secretary

FAX TRANSMITTAL SHEET

DATE: 4-21-92

NAME(S): Ron Roberson

DEPARTMENT/COMPANY: DCAQD

PHONE: 904-630-3638

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 2

FROM: Bruce Mitchell

DEPARTMENT: FDER/DARM/BAR

OFFICE PHONE: 904-488-1344 FAX PHONE: (904)922-6979

SENDER: Sam

COMMENTS: Revision of this morning's Memo - added a SC on the expiration time! Jankovics RSM

MESSAGE COMPLETION

APR-21-1992 TUE 14:24

TELE NO: DIV OF AIR RES MGMT P-9996

TEL NO: 904-922-6979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OF	IN
891	04-21	14:23	00:01:24	1 579 3638		02	00



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

TO: Andy Kutyna, NED
Ron Roberson, DCAQD
Buck Oven, PPC
Richard Donelan, Esq., DER

FROM: Bruce Mitchell, ^{RM}FDER/DARM/BAR

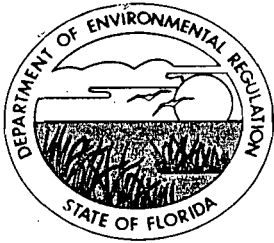
DATE: April 28, 1992 (3rd edition-see bold print for edits)

SUBJ: Draft Language of Specific Conditions for the Proposed
Usage of Recycling Fiber Rejects in the Seminole Kraft
Corporation's #1 and #2 Bark Boilers

The following draft language of Specific Conditions for the above referenced proposal is offered for your review, edit, etc.:

- o Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component (**i.e., bale strapping**) of the total fuel feed into the #1 (#2) Bark Boiler shall be limited to 30 percent or less, by weight, on a 24-hour daily basis. The plastic component of the fuel can only come from what is delivered with the recycled fiber bales, 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.**
- o The #1 (#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 #1 (#2) Bark Boiler.

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Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

TO: Andy Kutyna, NED
Ron Roberson, DCAQD
Buck Oven, PPC
Richard Donelan, Esq., DER

FROM: Bruce Mitchell, ^{RM}FDER/DARM/BAR

DATE: April 28, 1992 (3rd edition-see bold print for edits)

SUBJ: Draft Language of Specific Conditions for the Proposed Usage of Recycling Fiber Rejects in the Seminole Kraft Corporation's #1 and #2 Bark Boilers

The following draft language of Specific Conditions for the above referenced proposal is offered for your review, edit, etc.:

- o Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component (**i.e., bale strapping**) of the total fuel feed into the #1 (#2) Bark Boiler shall be limited to 30 percent or less, by weight, on a 24-hour daily basis. The plastic component of the fuel can only come from what is delivered with the recycled fiber bales, 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.**
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The final language will be incorporated into each boiler's permit, which will be a mirror of the existing operation permits plus these conditions. Please respond ASAP. Thanks!



Stone Container Corporation

Technology and Engineering

Containerboard and Paper Division

2150 Parklawn Drive
Suite 400
Atlanta, Georgia 30345

RECEIVED

404 621-6700

November 14, 1991

NOV 18 1991

Division of Air
Resources Management

Mr. Clair Fancy, Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

On November 6, 1991, you received a letter from Mike Riddle, Technical Director at the Seminole Kraft Paper Mill in Jacksonville, FL which addressed your concerns over the burning of recycled fiber rejects in the bark boilers.

Since sending the letter, we have discovered that the percent plastic value might be misleading. We stated that the plastic was 0.3% which was based on the total recycled fiber bale weight of 750 lbs. The actual reject portion of recycled fiber is approximately 15% or 112 lbs. out of a 750 lb. bale. Therefore, the actual, burnable recycled fiber reject feed contains 96.37% fiber, 1.4% inorganic (sand, glass, etc.) and 2.23% plastic which contains only 190 ppm of chlorine.

We apologize for any confusion that our original calculation may have caused and trust that this letter rectifies any deficiency.

Sincerely,

Craig Hurd
Regional Environmental Manager

bbm

cc: Curt Barton
Terry Cole
Mike Riddle
Larry Stanley
B. Mitchell
A. Rutledge, NE Dist.
R. Hollman, OESD



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-1

Lawton Chiles, Governor

Carol M. Browner, Sec

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FAX TRANSMITTAL SHEET

DATE: 4/28

NAME(S): Bon Roberson

DEPARTMENT/COMPANY: DCAQD

PHONE: 630-3638

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 3

FROM: Bruce Mitchell

DEPARTMENT: DARM / BAR

OFFICE PHONE: 488-1344 FAX PHONE: (904) 922-6979

SENDER: Kim Toker

COMMENTS: Revision

MESSAGE CONFIRMATION

APP-28-150 TUE 11:50

YEAR 100 DIV OF ENVIRONMENT P-2888

TEL NO: 904 922-6979

NO.	DATE	ST. TIME	TYPE	FILE	OF	PAGES
723	04-28	11:48	REGULAR		03	03



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Andy Kutyna, NED
Ron Roberson, DCAQD
Buck Oven, PPC
Richard Donelan, Esq., DER

FROM: Bruce Mitchell, ^{RM}FDER/DARM/BAR

DATE: April 28, 1992 (4th edition-see bold print for edits)

SUBJ: Draft Language of Specific Conditions for the Proposed Usage of Recycling Fiber Rejects in the Seminole Kraft Corporation's #1 and #2 Bark Boilers

The following draft language of Specific Conditions for the above referenced proposal is offered for your review, edit, etc.:

- o Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component (i.e., bale strapping and bags) of the total fuel feed into the #1 (#2) Bark Boiler shall be limited to a 24-hour daily basis. The plastic component of the fuel can only come from what is delivered with the recycled fiber bales, 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.
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State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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To: _____	Location: _____
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From: _____	Date: _____

Interoffice Memorandum

TO: Andy Kutyna, NED
Ron Roberson, DCAQD
Buck Oven, PPC
Richard Donelan, Esq., DER

FROM: Bruce Mitchell, ^{BRM} FDER/DARM/BAR

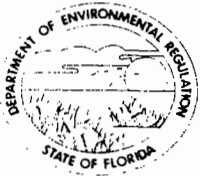
DATE: April 28, 1992 (5th edition-see bold print for edits)

SUBJ: Draft Language of Specific Conditions for the Proposed Usage of Recycling Fiber Rejects in the Seminole Kraft Corporation's #1 and #2 Bark Boilers

The following draft language of Specific Conditions for the above referenced proposal is offered for your review, edit, etc.:

- o Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component (i.e., bale **bindings**: strapping and bag) of the total fuel feed into the #1 (#2) Bark Boiler shall be limited to 30 percent or less, by weight, on a 24-hour daily basis. The plastic component of the fuel can only come from what is delivered with the recycled fiber bales, 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.
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State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Andy Kutyna, NED
Ron Roberson, DCAQD
Buck Oven, PPC
Richard Donelan, Esq., DER

FROM: Bruce Mitchell, ^{MBV}FDER/DARM/BAR

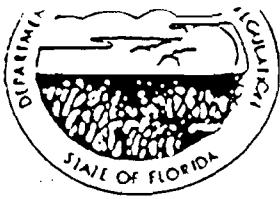
DATE: April 28, 1992 (6th edition-see bold print for edits)

SUBJ: Draft Language of Specific Conditions for the Proposed Usage of Recycling Fiber Rejects in the Seminole Kraft Corporation's #1 and #2 Bark Boilers

The following draft language of Specific Conditions for the above referenced proposal is offered for your review, edit, etc.:

- o Pursuant to 40 CFR 60.51a, Definitions-Cofired Combustor, the plastic component (i.e., bale bindings: strapping and **wrapping** bag) of the total fuel feed into the #1 (#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.
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Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

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FAX TRANSMITTAL SHEET

DATE: 4-29-92

NAME(S): Ron Roberson

DEPARTMENT/COMPANY: DCAAD

PHONE: 904-630-3638

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 2

FROM: Bruce Mitchell

DEPARTMENT: FDER/DARM/BAR

OFFICE PHONE: 904/444-1344 FAX PHONE: (904)922-6979

SENDER: Patty Adams

COMMENTS: Revision - Let me know what you think

Have a Good Day!

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MESSAGE CONFIRMATION

APR-29-1982 WED 14:11

DIV OF AIR RES NGMT P-8999

904-922-8879

NO.	DATE	ST. TIME	TOTAL TIME			DEPT CODE	OK	NS
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State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Andy Kutyna, NED
Ron Roberson, DCAQD
Buck Oven, PPC
Richard Donelan, Esq., DER

FROM: Bruce Mitchell, FDER/DARM/BAR

DATE: April 30, 1992 (7th edition-see bold print for edits)

SUBJ: Draft Language of Specific Conditions for the Proposed Usage of Recycling Fiber Rejects in the Seminole Kraft Corporation's #1 and #2 Bark Boilers

The following draft language of Specific Conditions for the above referenced proposal is offered for your review, edit, etc. (please note, "bag" was deleted after "wrapping" and "only" will remain in bold print and underlined; also, thanks for your responses on the various proposals):

- o 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 #1 (#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 (i.e., < 3.0% by weight).
- o The #1 (#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 #1 (#2) Bark Boiler.

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State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Andy Kutyna, NED
Ron Roberson, DCAQD
Buck Oven, PPC
Richard Donelan, Esq., DER

FROM: Bruce Mitchell, ^{RDW} FDER/DARM/BAR

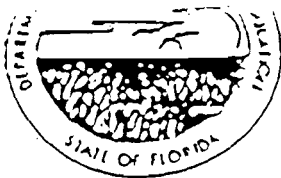
DATE: April 30, 1992 (8th edition-see bold print for edits)

SUBJ: Draft Language of Specific Conditions for the Proposed Usage of Recycling Fiber Rejects in the Seminole Kraft Corporation's #1 and #2 Bark Boilers

The following draft language of Specific Conditions for the above referenced proposal is offered for your review, edit, etc. (please note, the "(i.e., < 3.0% by weight)" was deleted after "1991". This is the final language that will be used. Again, thanks for your recommendations on the various proposals):

- o 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 #1 (#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.
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Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2

Leonidas Chiles, Governor

BEST AVAILABLE COPY

Carol M. Browner, Sec

FAX TRANSMITTAL SHEET

DATE: 4-30-92

NAME(S): Ren Roberson

DEPARTMENT/COMPANY: DCAQD

PHONE: 904-630-3638

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 3

FROM: Bruce Mitchell

DEPARTMENT: FDER/DARM/BAR

OFFICE PHONE: 904-488-1344 FAX PHONE: (904)922-6979

SENDER: Same

COMMENTS: 7th + 8th ed, with the 8th being the final edition. Thanks!!!
BR

MESSAGE COMPLETION

100-30-100 1-0 10188

TELEPHONE NUMBER OF THE FAX UNIT

TELEPHONE NUMBER OF THE FAX UNIT

DATE	TIME	TO	FROM	STATUS
4/30/92	10:15	904-630-3638	904-488-1344	OK

got from Buck 4/21/92
RBR

9. Prior to commercial operation of each source, the permittees shall each submit to the BAR a standardized plan or procedure that will allow that permittee to monitor emission control equipment efficiency and enable the permittee to return malfunctioning equipment to proper operation as expeditiously as possible.

D. Contemporaneous Emission Reductions

This certification and any individual air permits issued subsequent to the final order of the Board certifying the power plant site under 403.509, F.S., shall require that the following Seminole Kraft Corporation sources be permanently shut down and made incapable of operation; and, shall turn in their operation permits to the Division of Air Resources Management's Bureau of Air Regulation upon completion of the initial compliance tests on the AESCB boilers: the No. 1 PB (power boiler), the No. 2 PB, the No. 3 PB, the No. 1 BB (bark boiler), and the No. 2 BB. ^{construction} ~~DCRB~~ shall be specifically informed in writing within thirty days after each individual shut-down of the above referenced ^{equipment}. This requirement shall operate as a joint and individual requirement to assure common control for purpose of ensuring that all commitments relied on are in fact fulfilled.

III. WATER DISCHARGES

Any discharges into any waters of the State during construction and operation of AESCB shall be in accordance with all applicable provisions of Chapters 17-3, and 17-6, F.A.C., and 40 CFR, Part 423, Effluent Guidelines and Standards for Steam Electric Power Generating Point Source Category, except as provided herein. Also, AESCB shall comply with the following conditions of certification:

A. Plant Effluents and Receiving Body of Water

For discharges made from the AESCB power plant the following conditions shall apply:

1. Receiving Body of Water (RBW) - The receiving body of water has been determined by the Department to be those waters of the St. John's River or Broward River and any other waters affected which are considered to be waters of the State within the definition of Chapter 403, Florida Statutes.

2. Point of Discharge (POD) - The point of discharge has been determined by the Department to be where the effluent physically enters the waters of the State in the St. John's River via the SKC discharge outfall 001, which is the existing main outfall from the paper mill emergency overflow to the Broward River

3. Thermal Mixing Zones - The instantaneous zone of thermal mixing for the AESCB cooling system shall not exceed an area of 0.25 acres. The temperature at the point of discharge

§ 60.51a

40 CFR Ch. I (7-1-91 Edition)

al remains in a fluidized state in the primary combustion zone.

Chief facility operator means the person in direct charge and control of the operation of an MWC and who is responsible for daily on-site supervision, technical direction, management, and overall performance of the facility.

Circulating fluidized bed combustor means a fluidized bed combustor in which the majority of the fluidized bed material is carried out of the primary combustion zone and is transported back to the primary zone through a recirculation loop.

Coal/RDF mixed fuel fired combustor means a combustor that fires coal and RDF simultaneously.

Cofired combustor means a unit combusting MSW or RDF with a non-MSW fuel and subject to a Federally enforceable permit limiting the unit to combusting a fuel feed stream, 30 percent or less of the weight of which is comprised, in aggregate, of MSW or RDF as measured on a 24-hour daily basis. A unit combusting a fuel feed stream, more than 30 percent of the weight of which is comprised, in aggregate, of MSW or RDF shall be considered an MWC unit and not a cofired combustor. Cofired combustors which fire less than 30 percent segregated medical waste and no other municipal solid waste are not covered by this subpart.

Continuous emission monitoring system or *CEMS* means a monitoring system for continuously measuring the emissions of a pollutant from an affected facility.

Dioxin/furan means total tetra-through octachlorinated dibenzo-p-dioxins and dibenzofurans.

Federally-enforceable means all limitations and conditions that are enforceable by the Administrator including the requirements of 40 CFR parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 40 CFR 51.24.

Four-hour block average or *4-hour block average* means the average of all hourly emission rates when the affected facility is operating and combusting MSW measured over 4-hour periods of

time from 12 midnight to 4 a.m., 4 a.m. to 8 a.m., 8 a.m. to 12 noon, 12 noon to 4 p.m., 4 p.m. to 8 p.m., and 8 p.m. to 12 midnight.

Large MWC plant means an MWC plant with an MWC plant capacity greater than 225 megagrams per day (250 tons per day) of MSW.

Mass burn refractory MWC means a combustor that combusts MSW in a refractory wall furnace. This does not include rotary combustors without waterwalls.

Mass burn rotary waterwall MWC means a combustor that combusts MSW in a cylindrical rotary waterwall furnace. This does not include rotary combustors without waterwalls.

Mass burn waterwall MWC means a combustor that combusts MSW in a conventional waterwall furnace.

Maximum demonstrated particulate matter control device temperature means the maximum 4-hour block average temperature measured at the final particulate matter control device inlet during the most recent dioxin/furan test demonstrating compliance with the applicable standard for MWC organics specified under § 60.53a. If more than one particulate matter control device is used in series at the affected facility, the maximum 4-hour block average temperature is measured at the final particulate matter control device.

Maximum demonstrated MWC unit load means the maximum 4-hour block average MWC unit load achieved during the most recent dioxin/furan test demonstrating compliance with the applicable standard for MWC organics specified under § 60.53a.

Medical waste means any solid waste which is generated in the diagnosis, treatment, or immunization of human beings or animals, in research pertaining thereto, or in production or testing of biologicals. Medical waste does not include any hazardous waste identified under subtitle C of the Resource Conservation and Recovery Act or any household waste as defined in regulations under subtitle C of the Resource Conservation and Recovery Act.

Modular excess air MWC means a combustor that combusts MSW and that is not field-erected and has multiple combustion chambers, all of which

Environmental Protection Agency

are designed to operate at or above stoichiometric with combustion air amounts in excess of theoretical air requirements.

Modular starved air MWC means a combustor that combusts MSW in a combustor that is not field-erected and has multiple combustion chambers in which the primary combustion chamber is designed to operate at substoichiometric conditions.

Municipal-type solid waste means household, commercial, and/or institutional waste. Household waste includes material discarded by single and multiple residential units, hotels, motels, and other permanent or temporary housing establishments or facilities. Commercial/retail waste includes material discarded by stores, offices, restaurants, warehouses, nonmanufacturing facilities at industrial facilities, and similar establishments or facilities. Institutional waste includes material discarded by schools, hospitals, manufacturing activities at private government facilities and other establishments or facilities. Household, commercial/retail, and institutional waste do not include wood pallets, construction and demolition wastes, industrial process manufacturing wastes, or motor vehicle parts (including motor vehicle parts and motor vehicle parts fluff). Municipal-type solid waste does not include motor vehicle parts, maintenance materials, limited to vehicles, used motor oil, and municipal type solid waste does not include wastes that are solely segregated medical wastes. However, any waste of segregated medical waste other than wastes which contain more than 30 percent waste medical waste discards, is considered to be municipal type solid waste.

Municipal waste combustor or *MWC unit* means any device that combusts, solid, liquid, or gaseous waste including, but not limited to, field-erected incinerators without heat recovery), modular combustors (starved air or excess air) (i.e., steam generating units), furnaces (whether suspended grate-fired, mass-fired, or bed-fired) and gasification/combustion units, engines, or other

CFR Ch. I (7-1-91 Edition)

Environmental Protection Agency

§ 60.51a

be reduced to 12 if Method 1 is used to locate the 12 CO₂ traverse points. Each individual CO₂ sample is taken at each traverse point, the CO₂ concentration (%CO₂) used in the calculation shall be the arithmetic mean of all the individual CO₂ concentrations at each traverse

Sampling is conducted after a traverse, an "adjusted" CO₂ concentration [(%CO₂)_{adj}], which accounts for effects of CO₂ absorption and dilution, may be used instead of the CO₂ concentration determined in paragraph (b). The adjusted CO₂ concentration shall be determined by the procedures in paragraph (c).

The owner or operator may use the following procedures to determine the adjusted CO₂ concentra-

tion. The volumetric flow rates at the inlet and outlet of the wet scrubber and the inlet CO₂ concentration may be used to determine the adjusted CO₂ concentration [(%CO₂)_{adj}] using the following equation:

$$(\%CO_2)_{adj} = (Q_{in}/Q_{out})$$

Adjusted outlet CO₂ concentration, percent dry basis.

(%CO₂)_{in} = CO₂ concentration measured at the inlet of the scrubber, percent dry basis.

Q_{in} = volumetric flow rate of effluent gas from the wet scrubber, dscm/min (dscf/min).

Q_{out} = volumetric flow rate of effluent gas from the wet scrubber, dscm/min (dscf/min).

At the inlet, Method 5 is used to determine the volumetric flow rate of effluent gas.

At the outlet, Method 2 is used to determine the volumetric flow rate of effluent gas as follows: Velocity traverses are conducted immediately before and immediately after each particulate filter at the outlet, and the results are averaged.

At the inlet, the emission rate factor, integrated sampling procedure of Method 3B is used to determine the CO₂ concentration [(%CO₂)_{in}] as follows: At least 12 sampling points are selected ran-

domly from the velocity traverse points and are divided randomly into three sets, equal in number of points; the first set of three or more points is used for the first run, the second set for the second run, and the third set for the third run. The CO₂ sample is taken simultaneously with each particulate run being conducted at the outlet, by traversing the three sampling points (or more) and sampling at each point for equal increments of time.

(2) Excess air measurements may be used to determine the adjusted CO₂ concentration [(%CO₂)_{adj}] using the following equation:

$$(\%CO_2)_{adj} = (\%CO_2)_{in} \frac{[(100 + \%EA_1)]}{(100 + \%EA_o)}$$

where:

(%CO₂)_{adj} = adjusted outlet CO₂ concentration, percent dry basis.

(%CO₂)_{in} = CO₂ concentration at the inlet of the wet scrubber, percent dry basis.

%EA₁ = excess air at the inlet of the scrubber, percent.

%EA_o = excess air at the outlet of the scrubber, percent.

(i) A gas sample is collected as in paragraph (c)(1)(iii) of this section and the gas samples at both the inlet and outlet locations are analyzed for CO₂, O₂, and N₂.

(ii) Equation 3B-3 of Method 3B is used to compute the percentages of excess air at the inlet and outlet of the wet scrubber.

[54 FR 6665, Feb. 14, 1989, as amended at 55 FR 5212, Feb. 14, 1990]

Subpart Ea—Standards of Performance for Municipal Waste Combustors

SOURCE: 56 FR 5507, Feb. 11, 1991, unless otherwise noted.

EFFECTIVE DATE NOTE: At 56 FR 5507, Feb. 11, 1991, Subpart Ea was added, effective Aug. 12, 1991.

§ 60.50a Applicability and delegation of authority.

(a) The affected facility to which this subpart applies is each MWC unit with an MWC unit capacity greater than 225 megagrams per day (250 tons per day) of MSW or RDF for which construction, modification, or recon-

struction is commenced after December 20, 1989.

(b) [Reserved]

(c) Affected facilities that combust tires or fuel derived solely from tires and that combust no other MSW or RDF are exempt from all provisions of this subpart except the initial report required under § 60.59a, paragraph (a).

(d) Cofired combustors, as defined under § 60.51a, are exempt from all provisions of this subpart except the initial report required under § 60.59a, paragraph (a), and records and reports of the daily weight of MSW or RDF and other fuels fired as required under § 60.59a, paragraphs (b)(14) and (m).

(e) Cofired combustors that are subject to a Federally-enforceable permit limiting the operation of the combustor to no more than 225 megagrams per day (250 tons per day) of MSW or RDF are exempt from all provisions of this subpart.

(f) Physical or operational changes made to an existing MWC unit solely to comply with emission guidelines under subpart Ca are not considered a modification or reconstruction and do not bring an existing MWC unit under this subpart.

(g) Municipal waste combustors combusting medical waste combined with other MSW are subject to all provisions of this subpart. Units combusting solely medical waste are not covered by this subpart.

(h) The following authorities shall be retained by the Administrator and not transferred to a State:

None

(i) This subpart shall become effective on August 12, 1991.

§ 60.51a Definitions.

ASME means the American Society of Mechanical Engineers.

Batch MWC means an MWC unit designed such that it cannot combust MSW continuously 24 hours per day because the design does not allow waste to be fed to the unit or ash to be removed while combustion is occurring.

Bubbling fluidized bed combustor means a fluidized bed combustor in which the majority of the bed materi-



Seminole Kraft Corporation

Jacksonville Mill

9489 Eastport Road

P.O. Box 26998

Jacksonville, Florida 32218-0998

RECEIVED

APR 3 1992

904 751-6400

April 3, 1992

D. E. R.
SITING COORDINATION

Mayor Ed Austin
City of Jacksonville
14th Floor, City Hall
220 East Bay Street
Jacksonville, Florida 32202

Dear Mayor:

Since Stone Container/Seminole Kraft purchased and reopened the paper mill on Jacksonville's Northside in 1987, we have made significant changes in the historical way this paper mill has worked in cooperation with this community...and worked to improve the environment.

This letter is to inform you of another step in the journey we began in 1987. We believe, and hope you will agree, the most recent decision made by Seminole Kraft which I will describe to you here is another positive effort on our part to say once again to the people of Northeast Florida--as well as our elected officials-- that Seminole Kraft is very sensitive to the high environmental standards and expectations of our community...and very sensitive to the important role of perceptions in today's political environment.

As you know, Seminole Kraft will soon open the world's largest facility for the recycling of paper products...some 1,700 tons per day. A simultaneous benefit of removing over 600,000 tons of paper from our landfills each year will be the significant benefit of removing the smell from the air which has resulted from the operation of this mill for some four decades.

We think both of these benefits are extremely important not only to the growth and future of Seminole Kraft, but to the quality of life and the future of Northeast Florida.

It has been very expensive for Seminole Kraft to meet this significant milestone. We initially invested some \$50 million in recommissioning the mill after we purchased it, along with installing environmental equipment and controls which has already

Mayor Ed Austin
April 3, 1992
Page Two

resulted in the reduction of odorous TRS emissions by 92 per cent. On top of that \$50 million, Seminole Kraft is now spending another \$117 million to develop and build the facility which will make our paper mill a 100 per cent recycling operation...and totally eliminate the mill's smell.

I might add parenthetically here that none of the requirements from local, state or federal regulatory agencies called for the total elimination of TRS, only a significant reduction. The fact that Seminole Kraft will become 100 per cent odor free is another indication of our anxiousness and willingness to always do more than what is asked or called for in meeting legal requirements, or exceeding community standards.

In the last several months, there has been a misunderstanding and an unfortunate community controversy concerning Seminole Kraft's plans to close, and seek permission to rebuild and reopen three boilers that will meet the latest air emission standards and supply the steam needed to power our paper mill.

As you also know, the plans which were approved by the Florida DER and Jacksonville BESD in 1989 permitted a large low odor Kraft recovery boiler as well as the purchase of steam from AES Cedar Bay to power our mill. This approved plan allowed for 8 permitted sources of air emissions.

Without recounting all of the details, I simply want to point out again, when we determined that Seminole Kraft and Jacksonville's environment would benefit even further by seeking to rebuild three boilers to replace the already permitted low odor Kraft recovery boiler, our plans were always communicated to the proper government agencies and officials through proper channels.

We have every confidence and reason to believe that the Special Counsel appointed by the Governor will concur with this statement. We felt at the time, and still feel today, that this was a decision in the best interest of Seminole Kraft and the best interest of Jacksonville's environment.

Unfortunately, because of the controversy and important community attitudes, it has become apparent that Seminole Kraft has had great difficulty in explaining the environmental validity of this decision or in convincing the community of the correctness of this direction.

Mayor Ed Austin
April 3, 1992
Page Three

Frankly, Mayor, the controversy surrounding this single issue has tended to cloud and cover the tremendous successes made at Seminole Kraft, and it has overshadowed the \$165 million investment we are making to improve Jacksonville's environment.

For those reasons, and because we intend to maintain our policy of being extremely sensitive to the feelings of the people who live and work in this community, Seminole Kraft has decided NOT to seek permission to upgrade and reopen these three controversial boilers once they are closed. When they are shut down, they will become another piece of the past history of this mill.

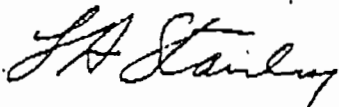
And, at significant expense...at a cost of many millions of dollars...Seminole Kraft will permit and build new boilers meeting the same New Source Performance Standards to supply the steam required to power this mill in addition to that which will be purchased that will allow us to recycle 1,700 tons of OCC and other paper product's each day; clean Jacksonville's air; produce a quality American product which is competitive around the world, and help support Jacksonville's economy through good paying manufacturing jobs.

Mayor, I would say to you again that Seminole Kraft has made monumental contributions to Jacksonville since we reopened the closed mill and restored over 400 jobs.

We came to Northeast Florida with the clear understanding we would be an outstanding member of this community. We said Stone Container and Seminole Kraft would create a paper mill which would become a source of community pride because of its environmental and economic contributions. That was our commitment then, it is our commitment now. The decision I am communicating to you today is just one more way we are demonstrating that Seminole Kraft keeps its commitments.

Finally, Mayor, I want you to know how much I appreciate the willingness of you and the members of your staff to work with us on this issue, the leadership you have provided, and the cooperation and courtesy we have received.

Sincerely,



L.A. Stanley
General Manager



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Power Plant Siting Review Committee
FROM: Buck Oven *B/O*
DATE: March 17, 1992
SUBJECT: AES/Cedar Bay Sufficiency Supplement
Module 8184

Attached please find supplementary materials to the sufficiency response submitted by AES on February 26, 1992.

Attachments

RECEIVED

MAR 18 1992

Division of Air
Resources Management

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

AES CEDAR BAY, INC., and
SEMINOLE KRAFT CORPORATION,

Petitioner,

vs.

DER CASE NO. PA 88-24
DOAH CASE NO. 88-5740

DEPARTMENT OF ENVIRONMENTAL
REGULATION,

Respondent,

and

CITY OF JACKSONVILLE, DEPARTMENT
OF COMMUNITY AFFAIRS, PUBLIC
SERVICE COMMISSION, ST. JOHNS
WATER MANAGEMENT DISTRICT,
JACKSONVILLE ELECTRIC AUTHORITY,
CHARLES L. BOSTWICK, BARNETT BANKS
TRUST COMPANY, IMESON INTERNATIONAL
PARK, INC., and INDUSTRIAL PARK
DEVELOPMENT CORPORATION,

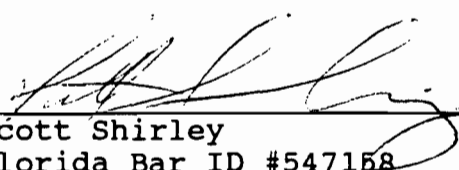
Intervenors.

NOTICE OF FILING ADDENDUM TO SUFFICIENCY RESPONSE

AES Cedar Bay, Inc., by and through undersigned counsel,
hereby gives notice of its filing of an addendum to its sufficiency
response, filed February 26, 1992.

Respectfully submitted,

OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.
Post Office Box 6507
Tallahassee, FL 32314-6507
(904) 877-0099



Scott Shirley
Florida Bar ID #547158
Terry Cole
Florida Bar ID #133550

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that fourteen copies of the foregoing have been furnished by **hand delivery** to Hamilton S. Oven, Chief, Power Plant Siting, Florida Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and copies were furnished by **United States Mail** to:

Kathryn Funchess, Esquire
Office of General Counsel
Department of Community Affairs
2740 Centerview Drive
Tallahassee, FL 32399-2100

Susan Clark, Esquire
General Counsel
Public Service Commission
101 East Gaines #226
Tallahassee, FL 32399-0850

Charles L. Bostwick
1550-2 Hendricks Avenue
Jacksonville, FL 32201

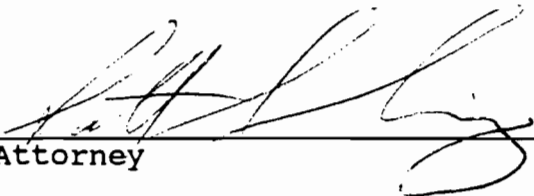
Earl Barker, Esquire
344 East Duval Street
Jacksonville, FL 32202

Richard Donelan, Esquire
Office of General Counsel
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Kathryn L. Mennella, Esquire
St. Johns River Water Management District
Post Office Box 1429
Palatka, FL 32178-1429

Greg Radlinski, Esquire
Assistant General Counsel
Towncentre, Suite 715
421 West Church Street
Jacksonville, FL 32202

this 17th day of **March, 1992.**



Attorney

SS:cjb/1219-4.suf

March 13, 1992

Hamilton S. Oven
Chief, Power Plant Siting
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Buck,

It has come to our attention that certain figures were not included in our submittal of the amended Application for Modification dated February 26, 1992. The figures are attached and should be inserted as follows.

Figure 3.5-1 & Figure 3.5-2	insert following page 11-3
Figure 5.1-1	insert following page 11-13
Figure 5.2-1	insert following page 11-17

We apologize for any inconveniences this omission may have caused.

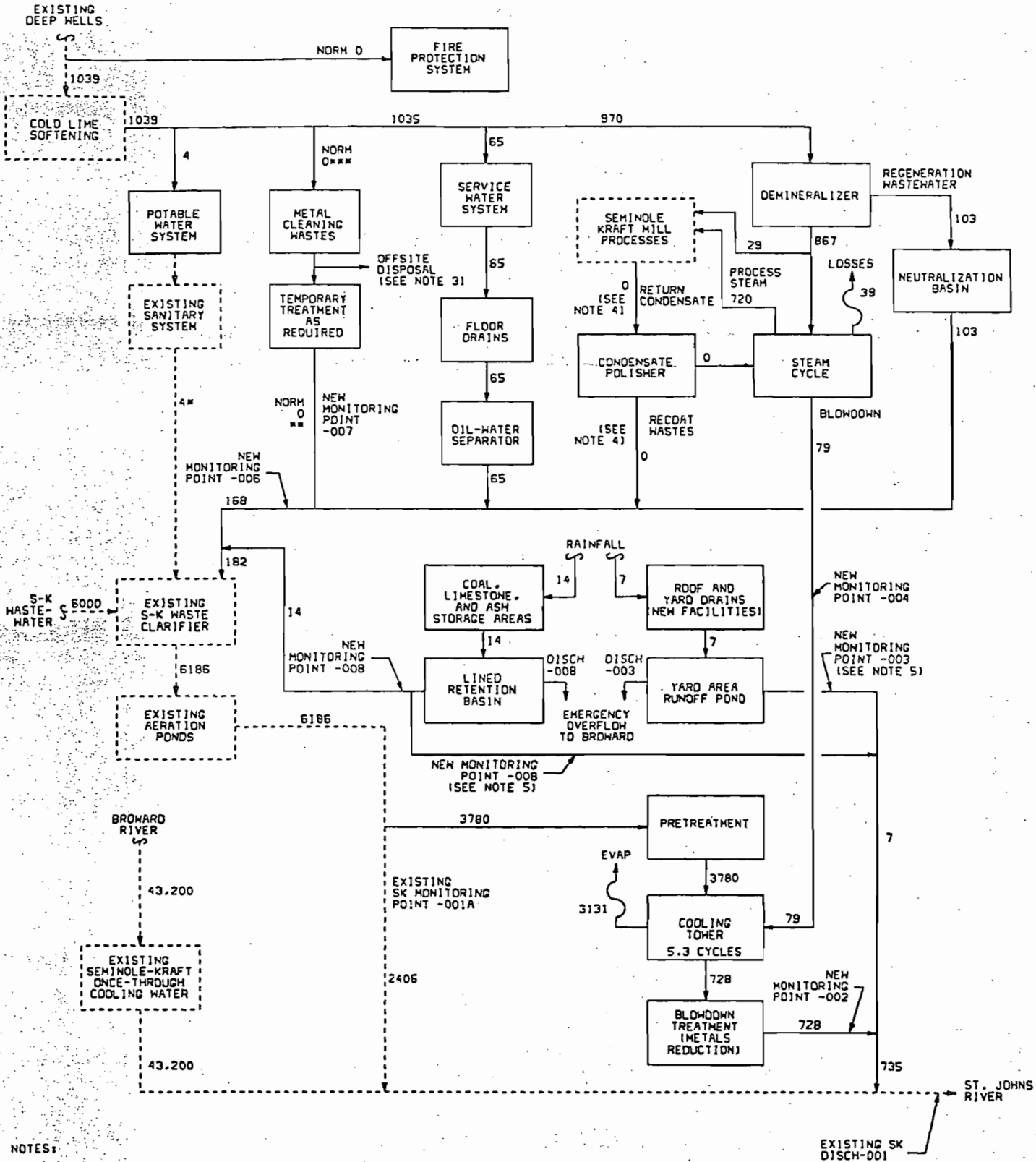
Sincerely,



Steve Wolf
Sr. Project Engineer

Enclosures

AS/Cedar Bay Inc.



NOTES:

1. FLOWS ARE ESTIMATED ANNUAL AVERAGES EXPRESSED IN 1000 GALLONS PER DAY FOR 100 PERCENT LOAD.
2. SOLID LINES REPRESENT NEW EQUIPMENT OR PIPELINES. DASHED LINES REPRESENT EXISTING EQUIPMENT OR PIPELINES.
3. ACID CLEANING SOLUTIONS TO BE DISPOSED OFFSITE TO APPROVED FACILITY.
4. RETURN CONDENSATE CAN VARY FROM 0 TO 432,000 GPD.
5. INCLUDES CONSTRUCTION RUNOFF.

- AMOUNT OF FLOW ATTRIBUTABLE TO CEDAR BAY COGENERATION PROJECT
- FLOW WILL OCCUR ONLY DURING MAINTENANCE OUTAGES.

Figure 3.5-1

**AES Cedar Bay
Water Balance Diagram**

AES CEDAR BAY

CLASS III DISCHARGE COOLING SYSTEM TREATMENT

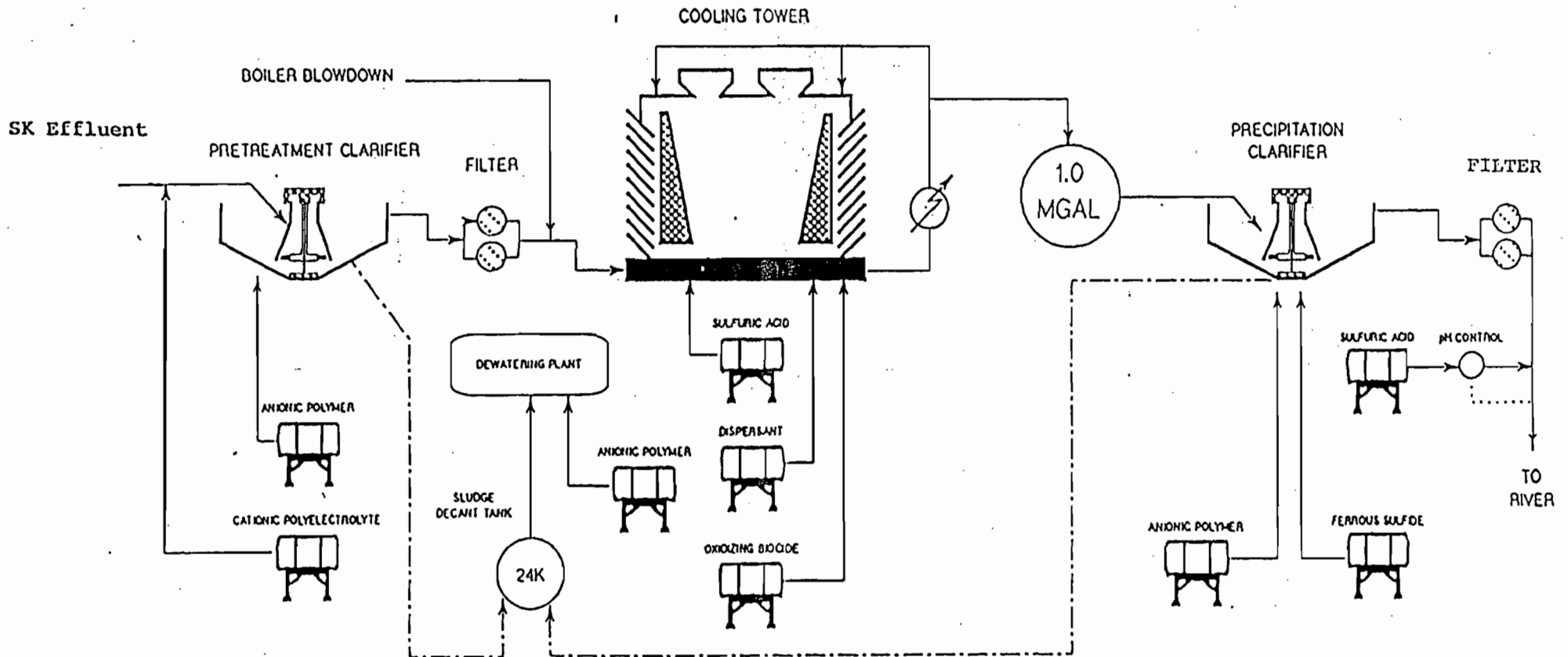
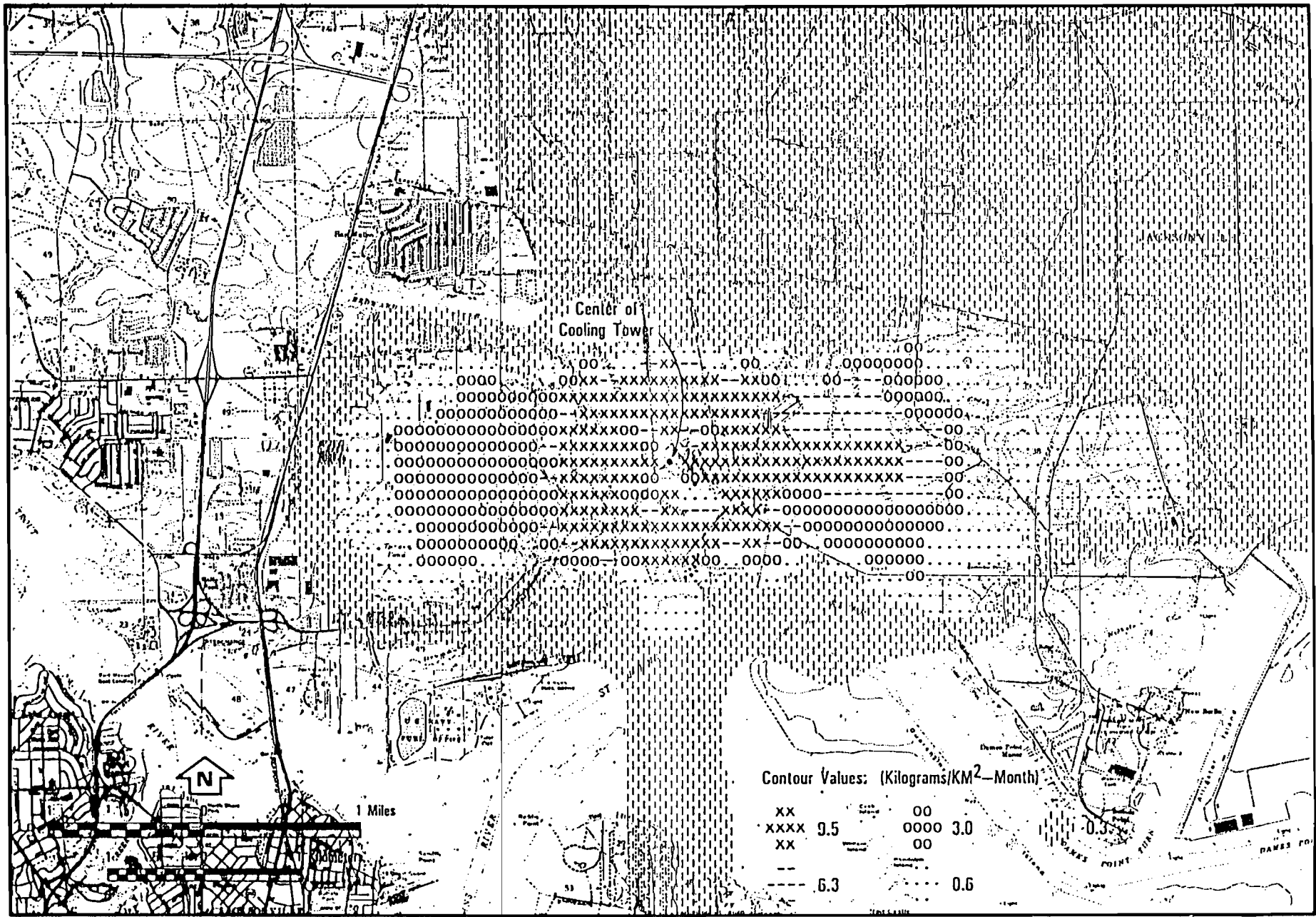


FIGURE 3.5-2



Based on Seminole Kraft Effluent

Figure 5.1-1

PLUME SALT DEPOSITION FROM THE CEDAR BAY COOLING TOWER

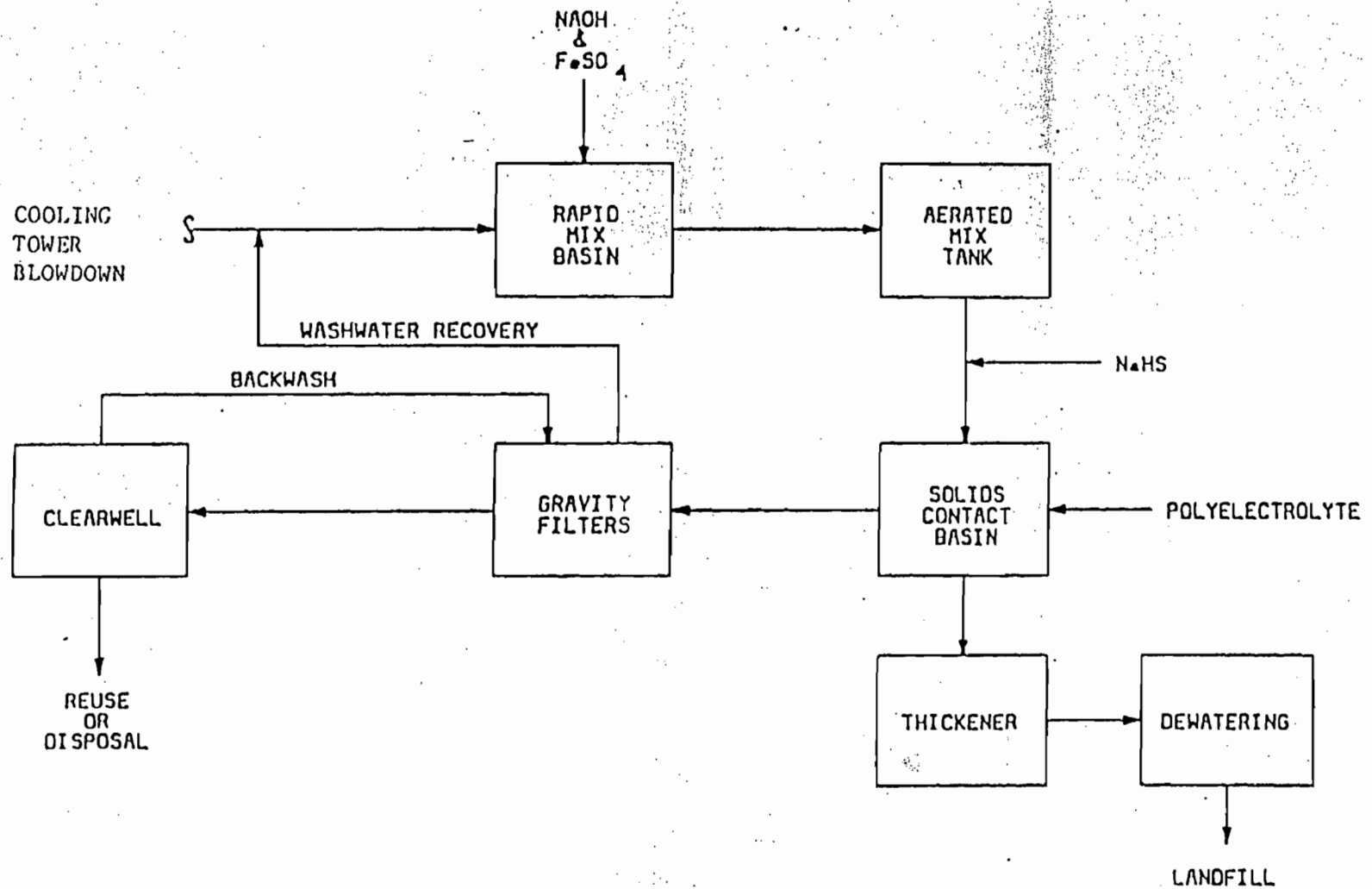


FIGURE 5.2-1

Iron Co-precipitation Process Schematic



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

TO: CLAIR FANCY Barry
FROM: BUCK OVEN
SUBJECT: AES/ CEDAR BAY
DATE: 3/17/92

~~Director~~ Bruce are you doing
this -
You were looking at the
modification request Barry

RECEIVED

MAR 18 1992

Division of Air
Resources Management

~~Barry A~~
Bruce ~~Barry~~) fy
J. L.

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

- | | |
|----|---|
| 1. | Chair Bruce |
| 2. | Subject: Seminole Kraft Co. |
| 3. | #1 & #2 Bark Boilers - utilization |
| 4. | of recycle material |

Remarks:

- ① DKE submitted apps x 2 for Construction Permits on 10 February; AC16-208322
AC16-208323
 - ② 30 Day completeness review ends Wed-11 March; will let you know of any items of incompleteness as they arise;
 - ③ Duval Co. is checking to existing Operation Permits (issued Nov, 1988) for clarity / substance (etc.); both were signed by J. Manning / E. Frey; AD16-149235
AD16-149236
 - ④ If no change of the OPs, then we will develop the specific condition(s) to address the use of recycle material only (there will be no change in the language in the OPs);
- Note: Duval Co's attorney is Richard Donelan will be in total agreement prior to all language(s) prior to sety out on PN!!!! *to finally*

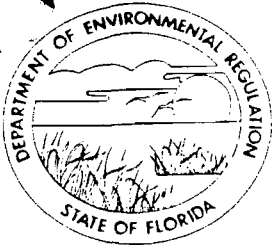
From:

Bruce

Date

3-6-92

Phone



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

NOTICE OF PERMIT

file

Mr. T. Frank Lee
General Manager
Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, FL 32218

Dear Mr. Lee:

Duval County - AP
Seminole Kraft Corporation
Bark Boiler No. 1

Enclosed is Permit Number A016-149235, dated November 9, 1988, to operate the subject air pollution source, issued pursuant to Section 403.087, Florida Statutes (F.S.).

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, F.S., to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5.201, Florida Administrative Code (FAC), and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, F.S.. This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, FAC. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., 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 the Final Order is filed with the Clerk of the Department.

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1.

Bruce Mitchell, DARM

2.

3.

4.

Remarks:

3-6-92

9:52-1:57

Spoke w/ Ron Roberson - asked him to review existing OIs for clarity / substance / etc. - to talk w/ him next week.

BRM

RECEIVED

MAR 01 1992

Division of Air
Resources Management

From:

Johnny

Date

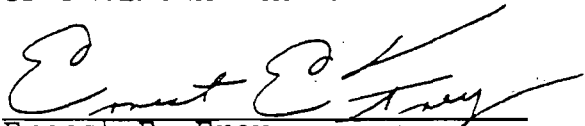
03-03-92

Phone

Mr. T. Frank Lee
Seminole Kraft Corporation
Bark Boiler No. 1
Permit No. A016-149235

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Ernest E. Frey
Deputy Assistant Secretary

WJ EEF:jsk

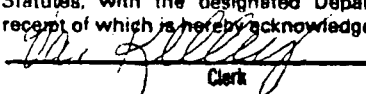
Copies furnished to:
Jacksonville BES

CERTIFICATE OF SERVICE

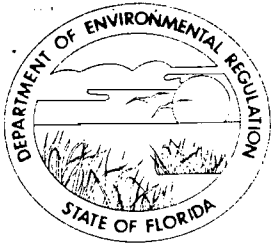
This is to certify that this NOTICE OF PERMIT, and all copies were mailed before the close of business on 11/14/88 to the listed persons.

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to S120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk

11/14/88
Date



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twächtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

I.D. Number:

31-16-0067-04

Permit/Certification Number:

AO16-149235

Date of Issue:

November 9, 1988

Expiration Date:

May 31, 1993

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-7441.800 N-3365.575

Project:

No. 1 Bark Boiler

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

For the operation of No. 1 Bark Boiler, Combustion Engineering Serial No. 16703 for the production of 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.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

No. 1 Bark Boiler

Control Equipment

Two sets of 4 each Buell VT Cyclone Separators in series with a Ducon Venturi Scrubber Type VVO

Emission source(s) shall be as follows:

Point

04

Source

No. 1 Bark Boiler

Located at 9469 Eastport Road, Jacksonville, Florida 32229

Supporting documents shall be as follows:

- (1) Permit AO16-71204
- (2) Operating Permit Application dated May 3, 1988
- (3) DER letter approving transfer of permits dated January 12, 1987
- (4) Stack tests (2) performed on October 28, 1987 and November 4, 1987.
- (5) Operation and Maintenance Plan

Permittee:
Seminole Kraft Corporation

LD. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

31-16-0067-04
AO16-149235
November 9, 1988
May 31, 1993

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.
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 non-compliance, including exact 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 revocation of this permit.

Permittee:
Seminole Kraft Corporation

L.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

31-16-0067-04
AO16-149235
November 9, 1988
May 31, 1993

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 non-compliance 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)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () 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.
 - 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.

Permittee:
Seminole Kraft Corporation

L.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

31-16-0067-04
AO16-149235
November 9, 1988
May 31, 1993

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)5., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
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% Sulfur)	on Request	*
	Visible Emissions (VE)	On request	EPA RM No. 9

*Sulfur 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 BESD, and shall be reported as the sulfur content by percent (%) weight.

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</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

L.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

31-16-0067-04
AO16-149235
November 9, 1988
May 31, 1993

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.

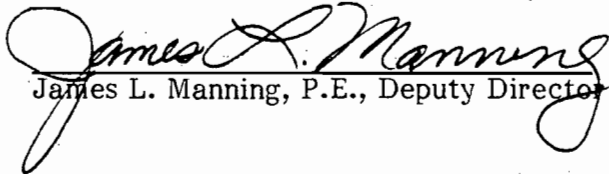
**Any combination shall be limited to 193 x 10⁶ BTU/hr. The allowable PM emission for any combination shall be calculated based on the sum of the individual calculations for carbonaceous fuel and fuel oil.

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

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

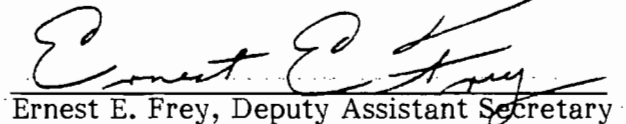
13. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit in accordance with Rule 17-4.090, FAC.

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services


James L. Manning, P.E., Deputy Director

Issued this 9 day of November, 1988

State of Florida
Department of Environmental Regulation


Ernest E. Frey, Deputy Assistant Secretary

¹ Florida Administrative Code

² Jacksonville Environmental Protection Board

CERTIFICATION

FACILITY SEMINOLE KRAFT CORP.
SOURCE NO. 1 BARK BOILER
APPLICATION NUMBER 149235

I HEREBY CERTIFY that the engineering features described in the referenced application provide reasonable assurance of compliance with the applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Title 17. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

James O. Sewell, P.E.
NAME, P.E.

James O. Sewell 25 June 88
Signature and Seal Date

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
904/798-4200



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER

NOTICE OF PERMIT

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

file

Dear Mr. Lee:

Duval County - AP
Seminole Kraft Corporation
No. 2 Bark Boiler

Enclosed is Permit Number A016-149236, dated Sept. 6, 1988, to operate the subject air pollution source, issued pursuant to Section 403.087, Florida Statutes (F.S.).


Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, F.S., to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5.201, Florida Administrative Code (FAC), and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, F.S.. This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, FAC. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., 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 the Final Order is filed with the Clerk of the Department.

Mr. T. Frank Lee
Semionole Kraft Corporation
No. 2 Bark Boilerr
Permit No. A016-149236

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Ernest E. Frey
Deputy Assistant Secretary

WLF
EEF:jsk

Copies furnished to:

Jacksonville BES
John T. McKinnon, P.E.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 9/8/88 to the listed persons.

FILING AND ACKNOWLEDGEMENT

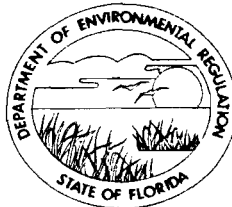
FILED, on this date, pursuant to S120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

W. Kelly 9/8/88
Clerk Desk

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
904/798-4200



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER
GARY L. SHAFFER
ASSISTANT DISTRICT MANAGER

Permittee:

Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

LD. Number:

31-16-0067-05

Permit/Certification Number:

AO16-149236

Date of Issue:

Sept. 6, 1988

Expiration Date:

May 31, 1993

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-7441.800 N-3365.575

Project:

No. 2 Bark Boiler

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

For the operation of Bark Boiler No. 2 - Combustion Engineering Ser. No. 18171 for the production of steam. Maximum heat input shall be 193×10^6 BTUs per hour firing carbonaceous fuel (bark) or Bunker C or No. 6 Fuel Oil with a maximum sulfur content of 2.27% by weight.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

Bark Boiler No. 2

Control Equipment

Two sets of 4 each Buell VT Cyclone Separators in series with a Ducon Venturi Scrubber Type VVO

Emission source(s) shall be as follows:

Point

05

Source

No. 2 Bark Boiler

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

- (1) Operating Permit Application dated April 25, 1988
- (2) Permit AO16-71205
- (3) DER letter approving transfer of permits dated January 12, 1987
- (4) Stack Test performed December 1, 1987

Permittee:

Seminole Kraft Corporation

L.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

31-16-0067-05

AO16-149236

Sept. 6, 1988

May 31, 1993

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.
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 non-compliance, including exact 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 revocation of this permit.

3-2-92

03:00 :106



Craig Hurd - Stone
cont.

404-621-6734

status of
SEC's appraisal
completeness reviews.

Permittee:

Seminole Kraft Corporation

L.D. Number:

31-16-0067-05

Permit/Certification Number:

AO16-149236

Date of Issue:

Sept. 6, 1988

Expiration Date:

May 31, 1993

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 non-compliance 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)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () 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.
 - 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.

Permittee:
Seminole Kraft Corporation

LD. Number: 31-16-0067-05
Permit/Certification Number: AO16-149236
Date of Issue: Sept. 6, 1988
Expiration Date: May 31, 1993

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)5., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
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) 5
	Fuel Oil Analysis (2.27% S)	On Request	*
	Visible Emissions (VE)	On Request	EPA RM 9

*Sulfur 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 BESD, and shall be reported as the sulfur content by percent (%) weight.

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>1FAC</u>	<u>2JEPB</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

L.D. Number: 31-16-0067-05
Permit/Certification Number: AO16-149236
Date of Issue: Sept. 6, 1988
Expiration Date: May 31, 1993

10. The maximum allowable emissions shall be as follows:

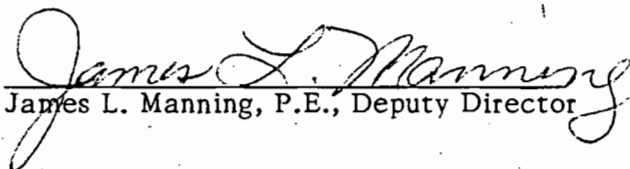
<u>Pt. No</u>	<u>Pollutant</u>	<u>lbs/hr</u>	<u>T/yr</u>	<u>Other</u>	<u>Opacity</u>
05	PM (carbonaceous fuel fired)	38.6	169.07	0.2 lb/10 ⁶ BTU heat input	
	PM (oil fired)	19.3	81.06*	0.1 lb/10 ⁶ BTU heat in put	
	**PM (combination of carbonaceous fuel fired and oil fired)				
	VE				30%

*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. An Operation and Maintenance Plan dated February 8, 1982 and revised by letter dated May 27, 1982 is attached to and becomes part of this permit pursuant to RACT rules, Chapter 17-2, Florida Administrative Code. Operation and Maintenance records outlined by this plan shall be kept for a minimum period of two (2) years and be made available to BESD upon request.
12. Operation shall be limited to 8760 hours per year while firing bark.
13. The pressure drop in the Venturi Scrubber Type VVO shall be maintained at a minimum of 20 inches water gauge.
14. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit in accordance with Rule 17-4.090, FAC.

City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services


James L. Manning, P.E., Deputy Director

Issued this 6 day of September, 1988
State of Florida
Department of Environmental Regulation


Ernest E. Frey, NE District Manager

¹ Florida Administrative Code

² Jacksonville Environmental Protection Board

CERTIFICATION

FACILITY SEMINOLE KRAFT CORP.
SOURCE NO. 2 BARK BOILER
APPLICATION NUMBER 149236

I HEREBY CERTIFY that the engineering features described in the referenced application provide reasonable assurance of compliance with the applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Title 17. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

James O. Sewell, P.E.

NAME, P.E.

James O. Sewell
Signature and Seal

25 June 88
Date

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

- 1. Bruce Mitchell DARN
- 2.
- 3.
- 4.

Remarks:

Attached is the information
on 5-K Bark Baler permits
that you requested. Please
call J. Cole or myself if
there are any questions

RECEIVED
FEB 13 1992
Division of Air
Resources Management

From: *Audrey Kutzner*

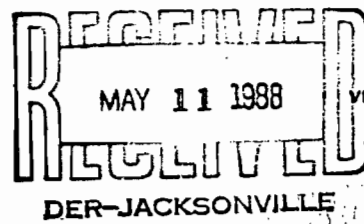
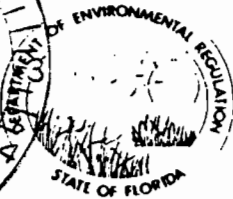
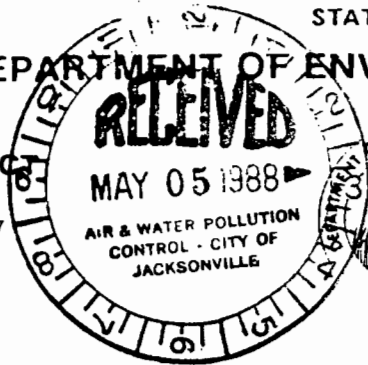
Date: 2-11-92
Phone:

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION
NORTHEAST DISTRICT

NORTHEAST DISTRICT

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKA
SECRETARY

LENEE E. FINE
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

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

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

COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) No. 1 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: T. Frank Lee, 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 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 permit establishment.

*Attach letter of authorization

Signed: [Signature]

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

Date: 5/3/88 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 permit application. There is reasonable assurance, in my professional judgment, that

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

Best Available Copy

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



Signed John T. McKinnon, P.E.

John T. McKinnon, P.E.

Name (Please type)

Stone Container Corporation

Company Name (Please type)

2150 Parklake Dr., Suite 400, Atlanta, GA 3034

Mailing Address (Please type)

Florida Registration No. 37697 Date: 4/29/88 Telephone No. 404-621-6709

SECTION II: GENERAL PROJECT INFORMATION

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

This application is for renewal of operation permit for the No. 1 Bark Boiler. The No. 1 Bark Boiler is equipped with 8 cyclones (Buell VT) and a Venturi Scrubber (Ducon, VVO) and is in compliance with applicable limitations.

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

Start of Construction _____ Completion of Construction _____

- 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.)

This is just an operating permit renewal - n/a

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

A016-32761 issue Aug. 18, 1980 expired July 31, 1985.

A016-71204 issue Aug. 8, 1983 transfer Dec. 8, 1986 expire July 31, 1988.

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

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

The operation and maintenance plan 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 Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual I/yr			lbs/yr	I/yr	
Particulate Bark	Up to 38.6 ^c	74 ^d	0.2 lb/MMBtu ^a	38.6 ^c	338,136	169	6
Particulate Fuel Oil	Up to 19.3 ^c	No Data	0.1 lb/MMBtu ^a	19.3 ^c	169,068	84	
Visible Emissions	N/A		30% Opacity ^a	N/A ^c	N/A		6
SO ₂	483 ^c	71 ^e	2.5 lb/MMBtu ^b	482.5 ^c	4,226,700	2,113	6

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).

a. 17-2.650 (2) (c) 3

b. 17-2.600 (6) (c)

c. Calculated from permit data

d. 20.33 lb/hr x 305 days x 24h/day/2000 lb/hr = 74.41

e. Average of 1983 to 1985 burning 2.27&S Fuel Oil

DLR Form 17-1.202(1)

f. Calculate 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)
Buell VI Cyclone Separator	Particulate	est. 80%	N/A	estimated
Ducon Venturi Scrubber type VVO, Contract # C-73-131	Particulate	est. 92%	N/A	estimated

E. Fuels

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

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

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 onsite landfill. The particulate collected in the
scrubber liquid is sewered to the primary clarifier where it is dewatered with the primary
sludge and landfilled onsite.

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

Description of Waste _____

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

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

Manufacturer _____

Date Constructed _____ Model No. _____

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

Stack Height: _____ ft. Stack 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 device: 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

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 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

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

2.

- a. Control Device: b. Operating Principles:
- c. Efficiency:¹ d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:² h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

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 Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

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

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

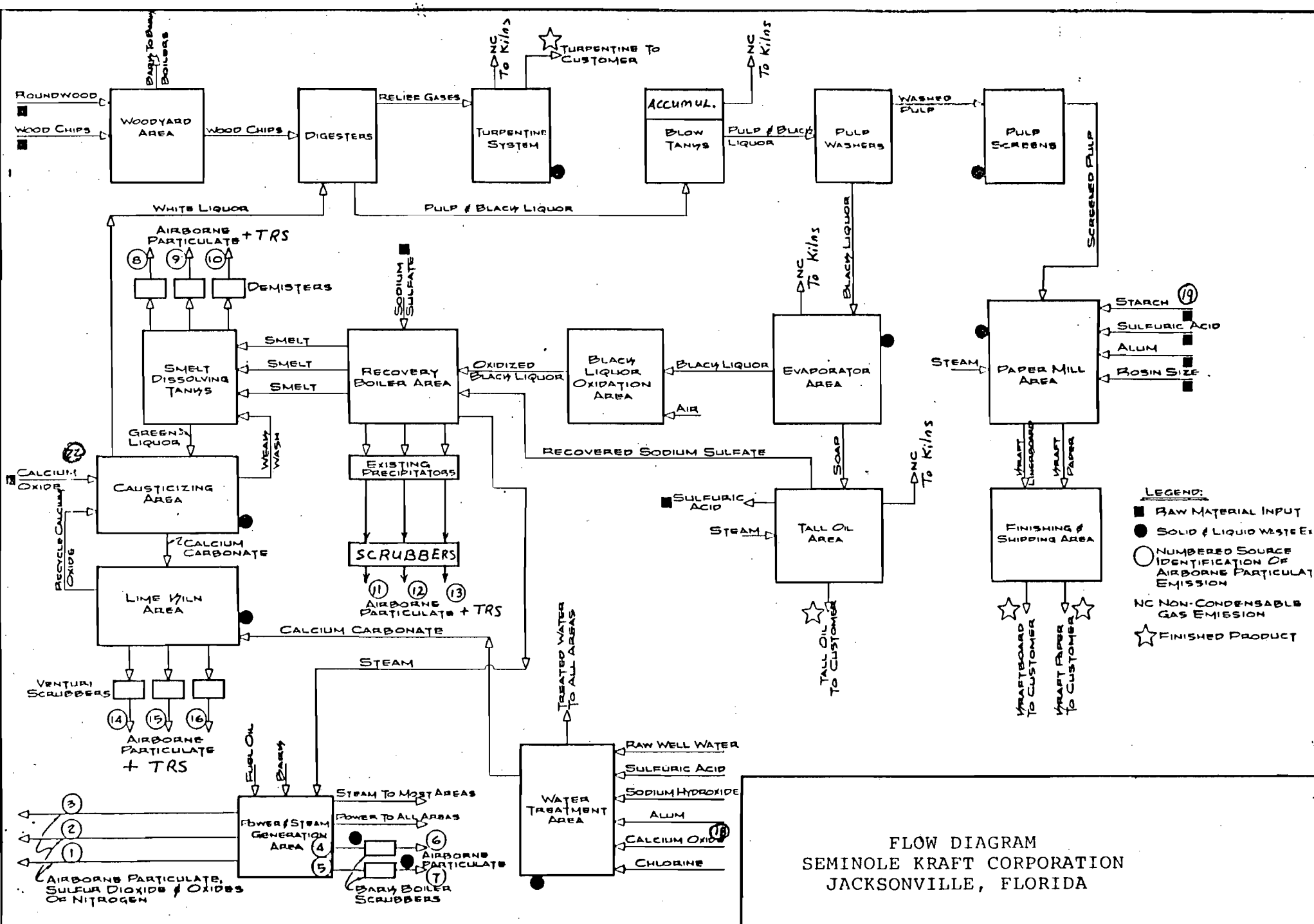
E. Emission Data Used in Modeling

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.

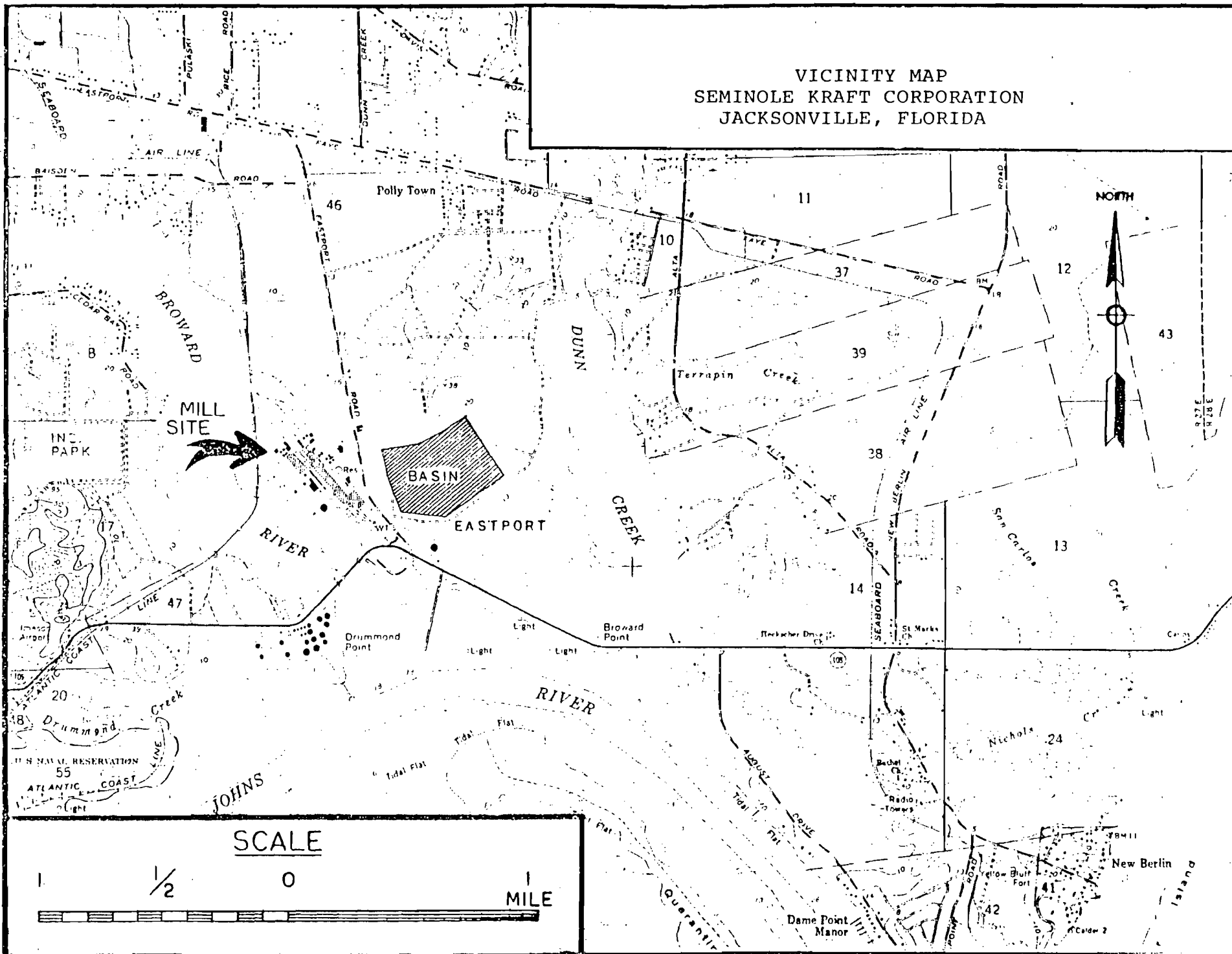
H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.



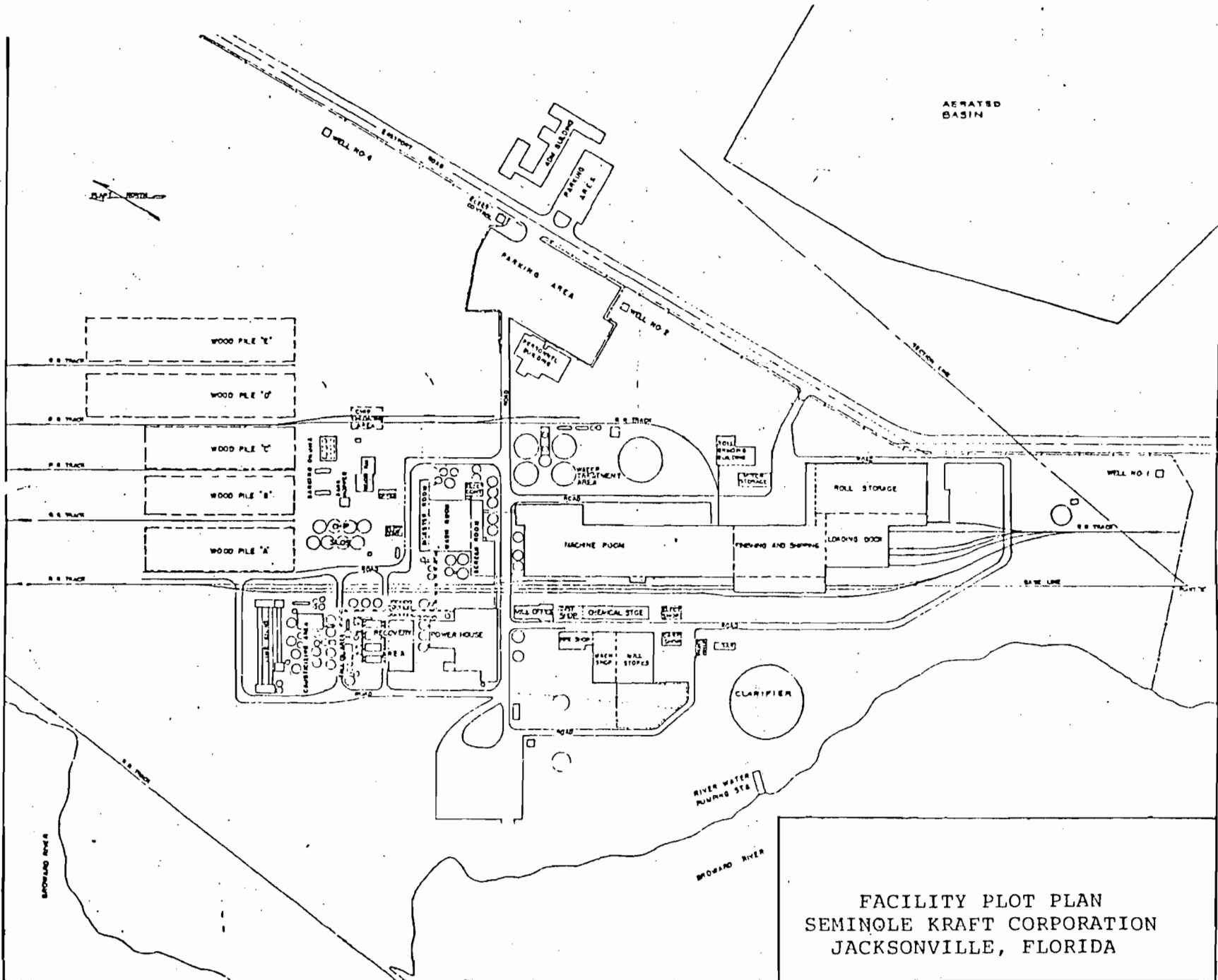
FLOW DIAGRAM
 SEMINOLE KRAFT CORPORATION
 JACKSONVILLE, FLORIDA

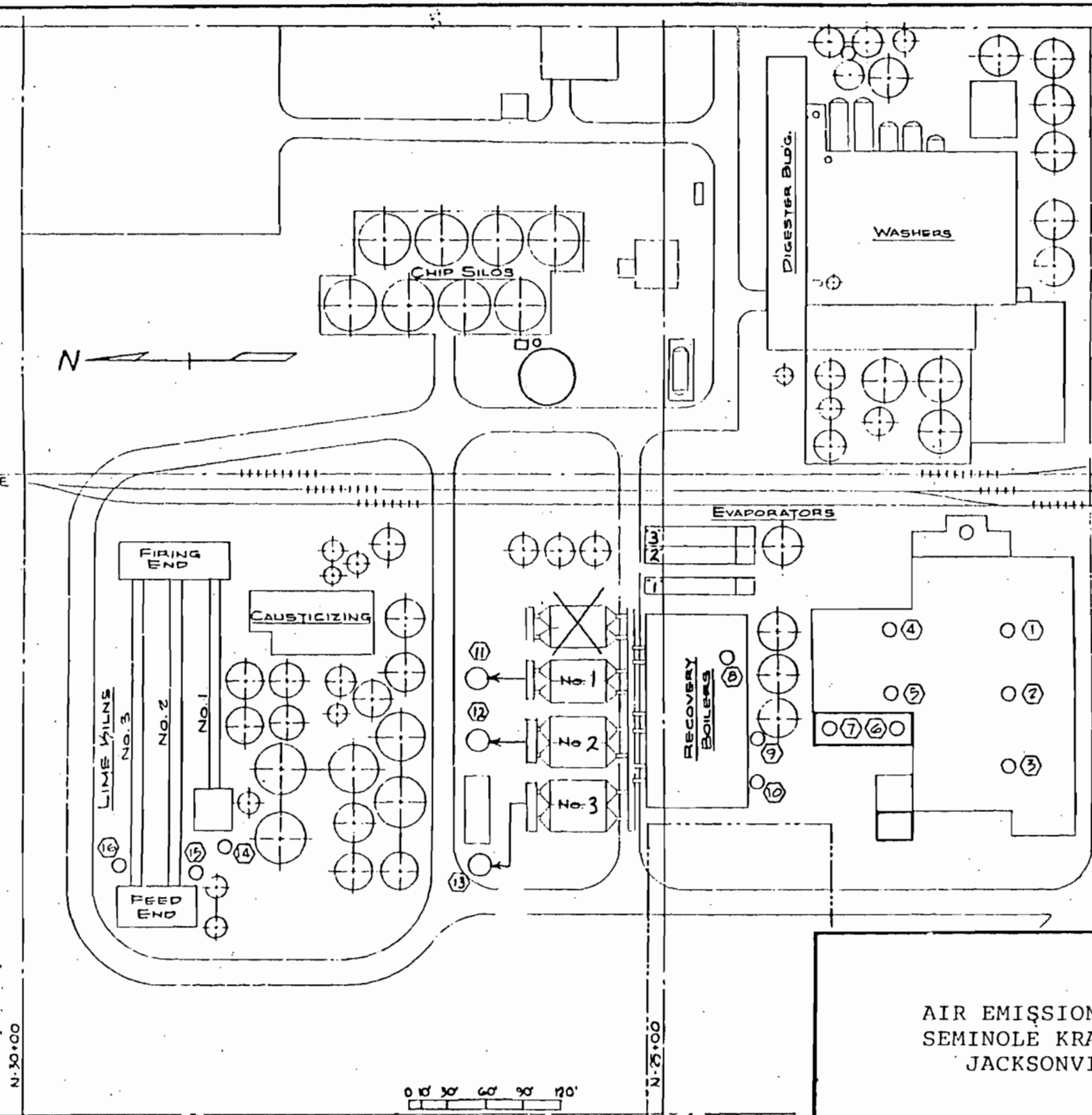
Best Available Copy

VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



Best Available Copy





- ① EXISTING NO. 1 POWER BOILER STACK
- ② EXISTING NO. 2 POWER BOILER STACK
- ③ EXISTING NO. 3 POWER BOILER STACK
- ④ EXISTING NO. 1 BARK BOILER STACK TO BE CAPPED
- ⑤ EXISTING NO. 2 BARK BOILER STACK TO BE CAPPED
- ⑥ NEW NO. 1 BARK BOILER SCRUBBER STACK
- ⑦ NEW NO. 2 BARK BOILER SCRUBBER STACK
- ⑧ EXISTING NO. 1 RECOVERY DISSOLVING TANK VENT STACK
- ⑨ EXISTING NO. 2 RECOVERY DISSOLVING TANK VENT STACK
- ⑩ EXISTING NO. 3 RECOVERY DISSOLVING TANK VENT STACK
- ⑪ EXISTING NO. 1 RECOVERY SCRUBBER
- ⑫ EXISTING NO. 2 RECOVERY SCRUBBER
- ⑬ EXISTING NO. 3 RECOVERY SCRUBBER
- ⑭ EXISTING NO. 1 LIME KILN SCRUBBER STACK
- ⑮ EXISTING NO. 2 LIME KILN SCRUBBER STACK
- ⑯ EXISTING NO. 3 LIME KILN SCRUBBER STACK

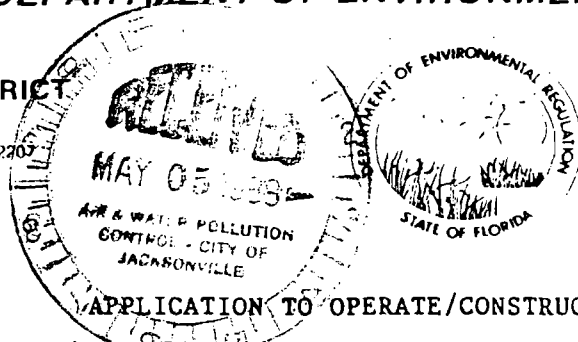
AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT
MAY 11 1988
DER-JACKSONVILLE

NORTHEAST DISTRICT

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

EDNESE E. FREY
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

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

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

COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) No. 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: T. Frank Lee, General Manager

APPLICANT ADDRESS: 9469 Eastport Road, P. O. Box 26998, Jacksonville, FL 322

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 permit establishment.

*Attach letter of authorization

Signed: [Signature]

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

Date: 4/25/88 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 permit application. There is reasonable assurance, in my professional judgment, that

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

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

Signed John T. McKinnon, P.E.

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

Stone Container Corporation
Company Name (Please Type)

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

Florida Registration No. 37697 Date: 4/29/88 Telephone No. 404-621-6709

SECTION II: GENERAL PROJECT INFORMATION

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

This application is for the renewal of the operation permit for the No. 2 bark boiler. The No. 2 bark boiler is equipped with a 56 tube Barron Base III 14K35 - 1006 AV Mechanical collector and a Ducon VVO Venturi Scrubber and is in compliance with emission limitations.

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

Start of Construction _____ Completion of Construction _____

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.)

This is just an operating permit renewal - n/a

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 expires July 31, 1985.

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

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 justifi-
cation 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 Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential ⁴ f Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual I/yr			lbs/yr	T/yr	
Particulate Bark	Up to 38.6 ^c	33.98	0.2 lb/MMBtu ^a	38.6 ^c	338,136	169	6
Particulate Fuel Oil	Up to 19.3 ^c	No Data	0.1 lb/MMBtu ^a	19.3 ^c	169,068	84	6
Visible Emissions	N/A		30% Opacity	N/A	N/A		
SO ₂	483 ^c	78 ^e	2.5 lb/MMBtu ^b	482.5 ^c	4,226,700	2,113	6

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)3. Table 11, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

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

a. 17-2.650 (2) (c) (3)

b. 17-2.600 (6) (c)

c. Calculated from permit data

d. 9.6 lb/hr x 295 days x 24h/day/2000 lb/ton = 33.98 (1987)

DER Form 17-1.202(1)

Effective November 30, 1982

e. Average from 1983 to 1985 for 2.27% S Fuel Oil.

f. Calculate 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)
Barron Base III 14K35- 100 6 AV Mechanical collector	Particulate	est 80%	N/A	estimate
Ducon (type VVO) Venturi Scrubber	Particulate	est 92%	N/A	estimate

E. Fuels

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

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

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 onsite. The particulate collected in the
scrubber water is sewered to the primary clarifier where it is dewatered with the primary
sludge and landfilled onsite.

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

Description of Waste _____

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

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

Manufacturer: _____

Date Constructed _____ Model No. _____

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

Stack Height: _____ ft. Stack 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 device: 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 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways. (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

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 61 applicable to the source?

Yes No

Contaminant	Rate or Concentration

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

Yes No

Contaminant	Rate or Concentration

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

Contaminant	Rate or Concentration

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

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

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft. b. Diameter: ft.
- c. Flow Rate: ACFM d. Temperature: °F.
- e. Velocity: FPS

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

1.

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

2.

- a. Control Device: b. Operating Principles:
- c. Efficiency:¹ d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:² h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

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 Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:¹

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:²

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

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.

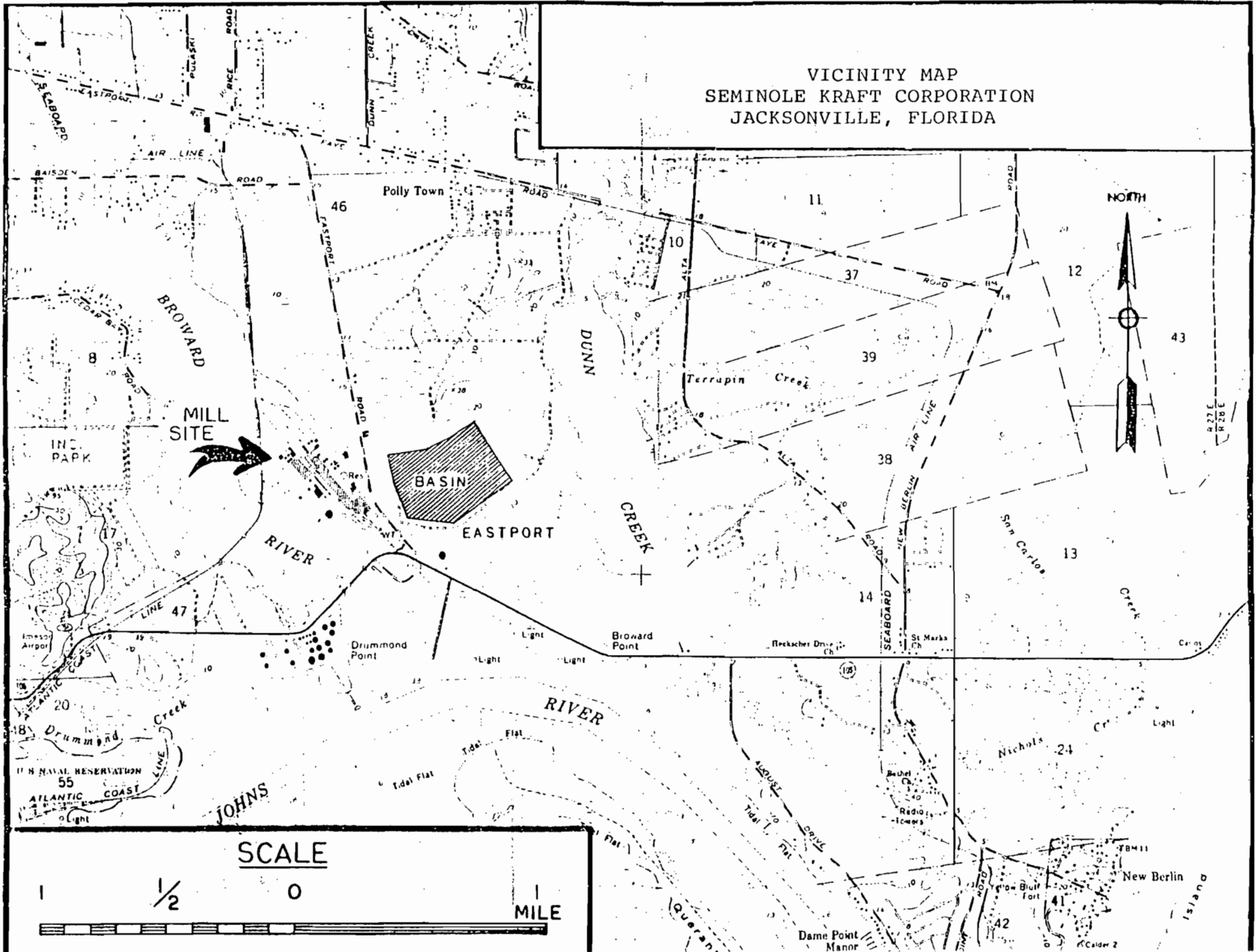
F. Attach all other information supportive to the PSD review.

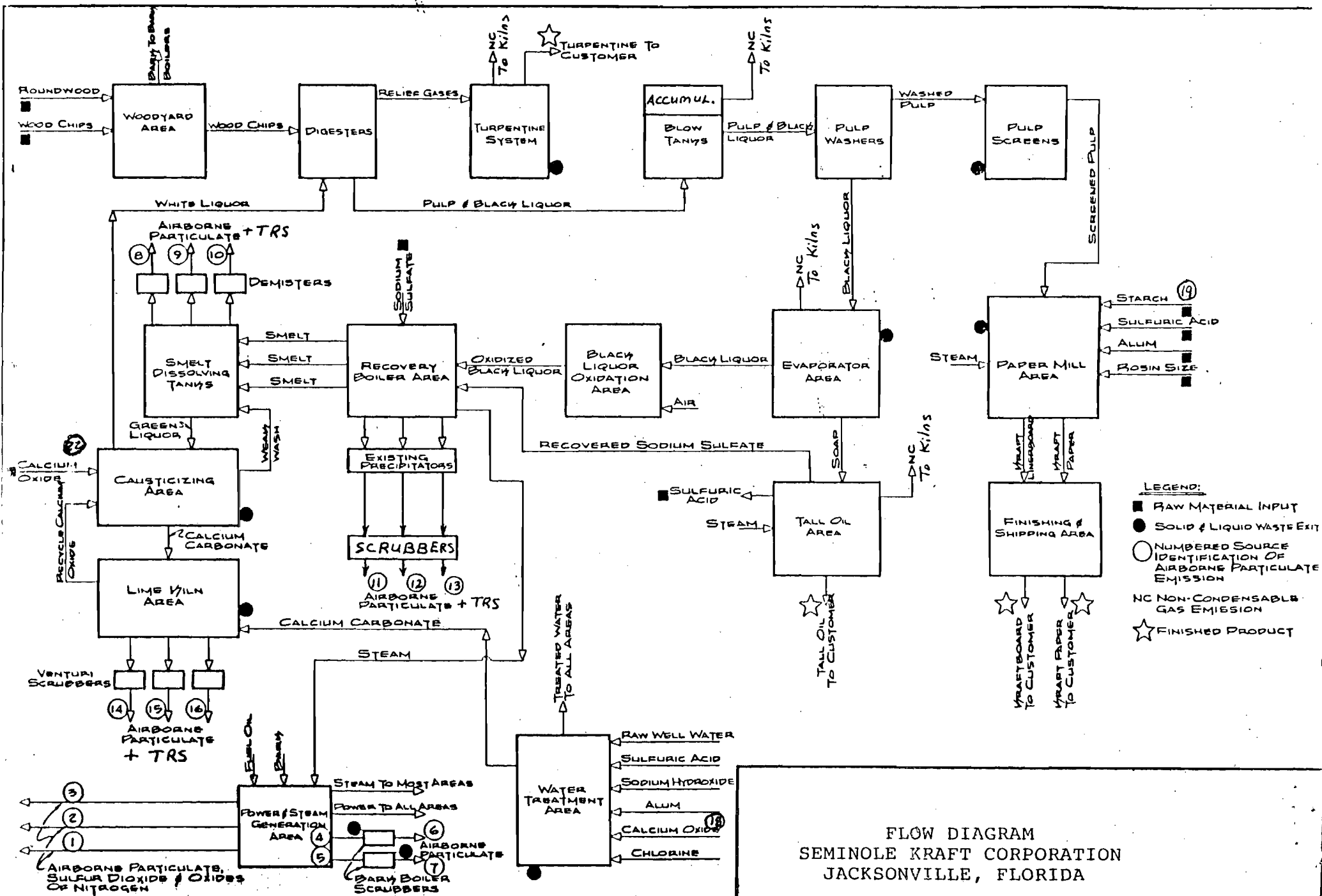
G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

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.

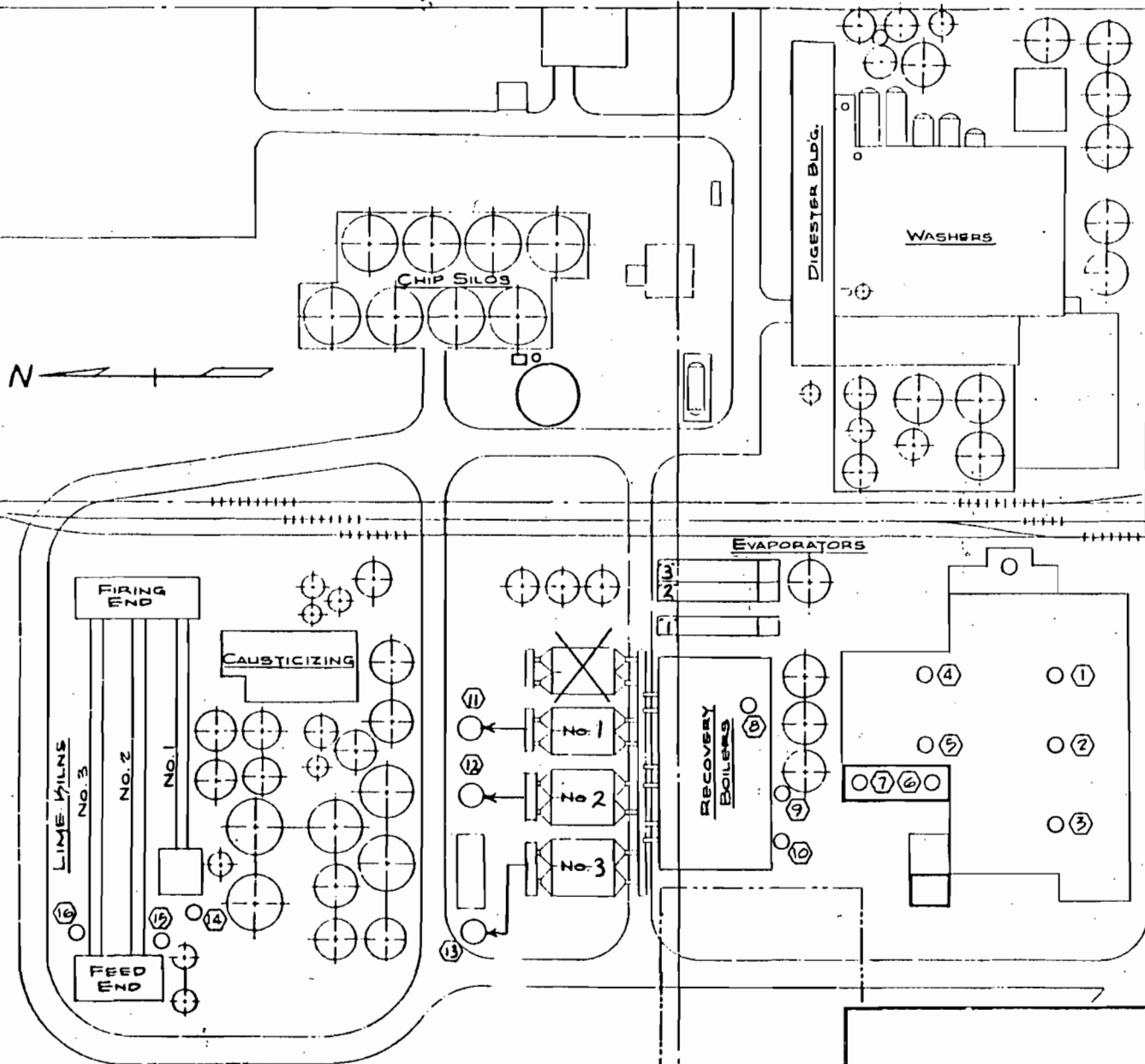
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VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





FLOW DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



- ① EXISTING NO. 1 POWER BOILER STACK
- ② EXISTING NO. 2 POWER BOILER STACK
- ③ EXISTING NO. 3 POWER BOILER STACK
- ④ EXISTING NO. 1 BARN BOILER STACK TO BE CAPPED
- ⑤ EXISTING NO. 2 BARN BOILER STACK TO BE CAPPED
- ⑥ NEW NO. 1 BARN BOILER SCRUBBER STACK
- ⑦ NEW NO. 2 BARN BOILER SCRUBBER STACK
- ⑧ EXISTING NO. 1 RECOVERY DISSOLVING TANK VENT STACK
- ⑨ EXISTING NO. 2 RECOVERY DISSOLVING TANK VENT STACK
- ⑩ EXISTING NO. 3 RECOVERY DISSOLVING TANK VENT STACK
- ⑪ EXISTING NO. 1 RECOVERY SCRUBBER
- ⑫ EXISTING NO. 2 RECOVERY SCRUBBER
- ⑬ EXISTING NO. 3 RECOVERY SCRUBBER
- ⑭ EXISTING NO. 1 LIME KILN SCRUBBER STACK
- ⑮ EXISTING NO. 2 LIME KILN SCRUBBER STACK
- ⑯ EXISTING NO. 3 LIME KILN SCRUBBER STACK

AIR EMISSION SOURCE DIAGRAM
 SEMINOLE KRAFT CORPORATION
 JACKSONVILLE, FLORIDA



Seminole Kraft Corporation

Jacksonville Mill

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

September 21, 1988

904 751-6400



Mr. Ernest E. Frey
District Manager
Department of Environmental Regulation
3426 Bills Road
Jacksonville, FL 32207

Dear Mr. Frey:

This letter is in response to DER's Notice of Permits for the following sources at our mill in Jacksonville:

#1 Bark Boiler	AO16-149235
#2 Bark Boiler	AO16-149236
#1 Power Boiler	AO16-149237
#2 Power Boiler	AO16-149238
#3 Power Boiler	AO16-149239

With respect to the permits to operate for the two bark boilers, we note that DER has apparently added a provision regarding the pressure drop in the Venturi Scrubbers (specific condition--13) which was previously made a condition of these permits when they were last reissued and then was removed by letter, dated September 13, 1983, (see letter attached). Accordingly, we believe, as the Department and Jacksonville Kraft previously concluded, that the pressure drop requirement is not necessary so long as these sources operate in compliance with the other conditions of these permits and therefore should be deleted from each bark boiler permit.


Regarding the permits to operate for the three power boilers, we note that DER has included in specific condition 14, language from the consent order regarding the sulfur content of the fuel oil to be burned. We do not object to most of the provisions contained in this condition except for the fuel oil testing requirement and more specifically, the initial frequency of such testing. Apparently, DER simply duplicated the language from the consent order which called for more frequent (weekly rather than monthly) testing during the first six months of mill operation.

Mr. Ernest E. Frey
September 21, 1988
Page 2

We must point out that this requirement was completed during the first six months of mill operation in 1987 and testing of the fuel oil has been monthly since that time. Therefore, we request that DER modify specific condition 14 in each power boiler permit to only require monthly fuel oil testing for sulfur content.

We appreciate this opportunity to comment on these permits to operate. As you may know, we filed a motion for Extension of Time for Filing Petition for Hearing regarding these permits in order to provide time to resolve the two issues noted above. Assuming the Department agrees with these suggested modifications, we would not plan to request a hearing regarding these permits. Please let us know if you have any questions or concerns.

Sincerely,



T. F. Lee
General Manager

ah

attachment

CC: J.L. Manning, BESD
Curt Barton
Terry Cole
John Millican
Mike Riddle
Malcolm Williams

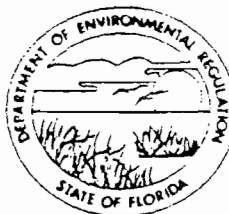
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STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

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



Boyer
9

BOB GRA
GOVER

VICTORIA J. TSCHIN
SECRET

G. DOUG DUT
DISTRICT MANA

September 13, 1983

Mr. J. Michael Watson, Attorney
Jacksonville Kraft Paper Co., Inc.
2400 Gulf Life Tower
Jacksonville, Florida 32207

Dear Mr. Watson:

Duval County - AP
Jacksonville Kraft Paper Co., Inc.
Bark Boilers No. 1 and No. 2
Permits No. A016-71204 and A016-71205

Reference your letter to Bio-Environmental Services Division August 29, 1983 and B.E.S. response dated September 7, 1983.

You are advised that the captioned permits are revised to delete Specific Condition No. 9 which sets forth a minimum pressure drop in the venturi scrubbers Type VVO.

This revision does not change the requirement set forth in the Operation and Maintenance Plan for Particulate Control, RACT Rule, Section 17-2.650(2)(g), Florida Administrative Code, which requires recording the hourly differential pressure drop in these scrubbers and other performance parameters which are indicators of the condition, operating rates and efficiencies.

Sincerely,

G. Doug Dutton
for G. Doug Dutton
District Manager

GDD:jkk

cc: Donald C. Bayly, BES
Eugene T. Tonn, P.E.



Seminole Kraft Corporation

Jacksonville Mill

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

RECEIVED
DER - MAIL ROOM
1992 FEB 10 AM 11:02

February 6, 1992

904 751-6400

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 it s 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

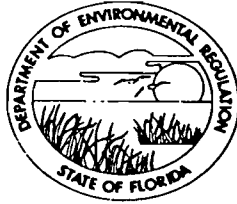
attachments

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

#250 pd,
2-10-92
Receipt #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

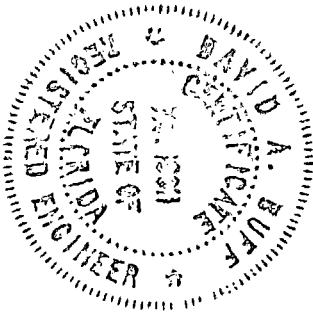
L.A. Stanley, General Manager
Name and Title (Please Type)

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 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 sewerd 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 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Examples: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

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.

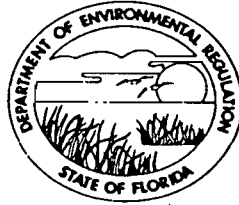
F. Attach all other information supportive to the PSD review.

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

\$250 pd.
3-10-92
Receipt # 180741



AC 16-208323

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

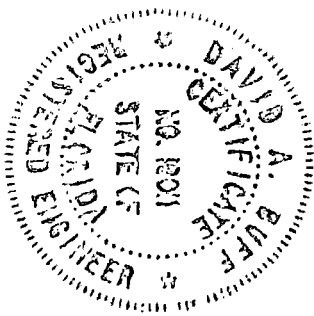
L.A. Stanley, General Manager
Name and Title (Please Type)

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. 1901 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	
Particulate Bark	Up to 38.6 ^c	33.98 ^d	0.2 lb/MMBtu ^a	38.6 ^c	338,136	169	6
Particulate Fuel Oil	Up to 19.3 ^c	No Data	0.1 lb/MMBtu ^a	19.3 ^c	169,068	84	6
Visible Emissions	N/A		30% Capacity	N/A	N/A		
SO ₂	483 ^c	78 ^e	2.5 lb/MMBtu ^b	482.5 ^c	4,266,700	2,113	6

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 sewerd 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.

To Bruce Mitchell
Date 4/9 Time 2:41

WHILE YOU WERE OUT
M Mr. Heard Heard
of Craig
Phone 404 621-6734
Area Code Number Extension

<input checked="" type="checkbox"/> TELEPHONED	<input type="checkbox"/> PLEASE CALL
<input type="checkbox"/> CALLED TO SEE YOU	<input type="checkbox"/> WILL CALL AGAIN
<input type="checkbox"/> WANTS TO SEE YOU	<input type="checkbox"/> URGENT
<input type="checkbox"/> RETURNED YOUR CALL	

Message S.K.C.: Boiler² permitting status
send him a copy of the TEDD

MS
Operator

Stom Contain Corp.
2150 Parklake Dr.
Suite 400
At
30345

Dir. of Env Affs;

Region Mg of Envir Servs

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.

SHIPPING

FROM INGOLE KRAFT 9469 EASTPORT RD JACKSONVILLE FL 32218 ANNE HARRIS 904 751 6400		ORIGIN JAX	AIRBILL NO. 705161435
TO Florida Department of Environmental Res 2600 Blair Stone Road Tallahassee, FL 32399-2400 Mr. Clair H. Fancy, P.E.		AIRBORNE EXPRESS	
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THANK YOU FOR SHIPPING WITH AIRBORNE EXPRESS

001 REV 01/80

SEMINOLE KRAFT CORPORATION

Best Available Copy

010878

9469 EASTPORT ROAD JACKSONVILLE, FL 32218

ED ROOM
AM 11: 02

date

2/06/92

amount

****500 dollars and ****00 cents

\$500.00

PAY
to the order of

FLORIDA DEPT. OF ENVMTL. REG.
515 W. 6TH STREET
JACKSONVILLE FL 322064397

NCNB NATIONAL BANK OF NORTH CAROLINA
ASHEVILLE, NORTH CAROLINA

Seminole Kraft Corporation

James P. Ledbetter

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 it s right to contest such a finding by the Department in the future), we have enclosed an application for each bark

Seminole Kraft Corporation

invoice date/account	invoice reference	invoice amount	discount	net amount
2/05/92	PERMIT FEE B 175	500.00	.00	500.00 \$500.00*

001032

detach before presenting check for payment

SEMINOLE KRAFT CORPORATION

010878

9469 EASTPORT ROAD JACKSONVILLE, FL 32218

531

date

2/06/92

amount

\$500.00

PAY
to the order of

****500 dollars and ****00 cents

FLORIDA DEPT. OF ENVMTL. REG.
515 W. 6TH STREET
JACKSONVILLE FL 322064397

NCNB NATIONAL BANK OF NORTH CAROLINA
ASHEVILLE, NORTH CAROLINA

Seminole Kraft Corporation

Edward P. Ledbetter



1-31-92

mtg @ BAR @ SKC representatives

Clair Fancy - FOER/DARM/BAR

Bruce Mitchell - FOER/DARM/BAR

Curt Barton - SKC - corporate

Terry Cole - Oertel Hoffman Fernandez, Cole

Issue on recycle usage in #1 & #2 BB.



Seminole Kraft Corporation

Jacksonville Mill

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

January 24, 1992

904 751-6400

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

RECEIVED
JAN 29 1992
Division of Air
Resources Management

Dear Mr. Fancy

This will respond to your letter of January 23, 1992, regarding Seminole Kraft's notice of its desire to burn recycled fiber rejects in its Bark Boilers at the Seminole Kraft facility in the interim period between start up of the recycled fiber project and commercial operation of AES Cedar Bay. We believe that recycled fiber rejects which we wish to burn in the two Bark Boilers are a carbonaceous fuel under Department and EPA rules. Both Bark Boilers are authorized by permit to burn carbonaceous fuel.

We do not agree that the small percentage of recycled fiber rejects, which would be burned in the Bark Boilers, are municipal-type solid waste or MSW. Federal regulations, which the Department referenced in its letter, 40 CFR Section 60.51a, define MSW as household, commercial/retail, and/or institutional waste. The Old Corrugated Containers (OCC), which will be the source of fiber for the mill, are not a waste since they have not been discarded but bought and sold as a commodity. Further, the OCC are not what will be burned in the Bark Boilers. The recycled fiber rejects, which would be burned in the Bark Boilers, are an industrial process waste which will result from the manufacturing of paper at the Seminole Kraft Mill after conversion to recycled fiber operation. Industrial process waste is specifically exempted from being classified as municipal type solid waste in 40 CFR 60.51a. MSW means "household, commercial/retail and/or institutional waste." The definition of commercial/retail waste includes only "non-manufacturing activities at industrial facilities." Commercial or retail wastes "do not include sewage, wood pallets, construction and demolition waste, industrial process or manufacturing wastes or motor vehicles." The fiber rejects which would be sent to the Bark Boilers are clearly industrial process wastes and, therefore, do not fit within the definition of MSW waste.

Because the recycled fiber rejects are not a MSW, neither do they qualify as a refuse-derived fuel or RDF since that is only a type

Mr. C.H. Fancy

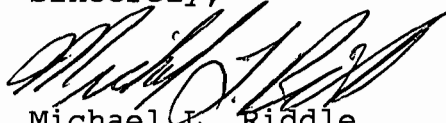
Page 2

of MSW which is produced by processing MSW through shredding and size classification.

Therefore, Seminole Kraft Corporation does not need to have the Bark Boilers classified as "cofired combustors" pursuant to 40 CFR 60.51a as suggested in the letter. Instead, we believe that the recycled fiber rejects should be recognized as a carbonaceous fuel which is already authorized to be burned in the Bark Boilers. We see no requirement for obtaining a permit, unless it is a minor amendment recognizing a change in the subcategories of fuel within the overall category of carbonaceous fuel.

Accordingly, we believe sufficient documentation has been provided to the Department to allow it by letter to approve the change in carbonaceous fuel. We appreciate the amount of work that the Department has devoted to researching this matter and will continue to work with the Department in ensuring all of its information needs are addressed.

Sincerely,



Michael L. Riddle
Manager, Technical Services

pt

cc: Bruce Mitchell, w/attachment
A. Kutyna, N.E. District, w/attachment
R. Roberson, BESD, w/attachment
G. Worley, EPA, w/attachment
Curt Barton, w/attachment
Terry Cole, w/attachment
Larry Stanley, w/attachment

MR14.doc

120:0370

FEDERAL REGULATIONS

Subpart Ea—Standards of Performance for Municipal Waste Combustors

[Subpart Ea added by 56 FR 5506, February 11, 1991]

§ 60.50a Applicability and delegation of authority.

(a) The affected facility to which this subpart applies is each MWC unit with an MWC unit capacity greater than 225 megagrams per day (250 tons per day) of MSW or RDF for which construction, modification, or reconstruction is commenced after December 20, 1989.

(b) [Reserved]

(c) Affected facilities that combust tires or fuel derived solely from tires and that combust no other MSW or RDF are exempt from all provisions of this subpart except the initial report required under § 60.59a, paragraph (a).

(d) Cofired combustors, as defined under § 60.51a, are exempt from all provisions of this subpart except the initial report required under § 60.59a, paragraph (a), and records and reports of the daily weight of MSW or RDF and other fuels fired as required under § 60.58a, paragraphs (b)(14) and (m).

(e) Cofired combustors that are subject to a Federally-enforceable permit limiting the operation of the combustor to no more than 225 megagrams per day (250 tons per day) of MSW or RDF are exempt from all provisions of this subpart.

(f) Physical or operational changes made to an existing MWC unit solely to comply with emission guidelines under subpart Ca are not considered a modification or reconstruction and do not bring an existing MWC unit under this subpart.

(g) Municipal waste combustors combusting medical waste combined with other MSW are subject to all provisions of this subpart. Units combusting solely medical waste are not covered by this subpart.

(h) The following authorities shall be retained by the Administrator and not transferred to a State:

None

(i) This subpart shall become effective on August 12, 1991.

§ 60.51a Definitions.

ASME means the American Society of Mechanical Engineers.

Batch MWC means an MWC unit designed such that it cannot combust MSW continuously 24 hours per day because the design does not allow waste to be fed to the unit or ash to be removed while combustion is occurring.

Bubbling fluidized bed combustor means a fluidized bed combustor in which the majority of the bed material remains in a fluidized state in the primary combustion zone.

Chief facility operator means the person in direct charge and control of the operation of an MWC and who is responsible for daily on-site supervision, technical direction, management, and overall performance of the facility.

Circulating fluidized bed combustor means a fluidized bed combustor in which the majority of the fluidized bed material is carried out of the primary combustion zone and is transported back to the primary zone through a recirculation loop.

Coal/RDF mixed fuel fired combustor means a combustor that fires coal and RDF simultaneously.

Cofired combustor means a unit combusting MSW or RDF with a non-MSW fuel and subject to a Federally enforceable permit limiting the unit to combusting a fuel feed stream, 30 percent or less of the weight of which is comprised, in aggregate, of MSW or RDF as measured on a 24-hour daily basis. A unit combusting a fuel feed stream, more than 30 percent of the weight of which is comprised, in aggregate, of MSW or RDF shall be considered an MWC unit and not a cofired combustor. Cofired combustors which fire less than 30 percent segregated medical waste and no other municipal solid waste are not covered by this subpart.

Continuous emission monitoring system or CEMS means a monitoring system for continuously measuring the emissions of a pollutant from an affected facility.

Dioxin/furan means total tetra- through octachlorinated dibenzo-p-dioxins and dibenzofurans.

Federally-enforceable means all limitations and conditions that are enforceable by the Administrator including the requirements of 40 CFR parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 40 CFR 51.24.

Four-hour block average or 4-hour block average means the average of all hourly emission rates when the affected facility is operating and combusting MSW measured over 4-hour periods of time from 12 midnight to 4 a.m., 4 a.m. to 8 a.m., 8 a.m. to 12 noon, 12 noon to 4 p.m., 4 p.m. to 8 p.m., and 8 p.m. to 12 midnight.

Large MWC plant means an MWC plant with an MWC plant capacity greater than 225 megagrams per day (250 tons per day) of MSW.

Mass burn refractory MWC means a combustor that combusts MSW in a refractory wall furnace. This does not include rotary combustors without waterwalls.

Mass burn rotary waterwall MWC means a combustor that combusts MSW in a cylindrical rotary waterwall furnace. This does not include rotary combustors without waterwalls.

Mass burn waterwall MWC means a combustor that combusts MSW in a conventional waterwall furnace.

Maximum demonstrated particulate matter control device temperature means the maximum 4-hour block average temperature measured at the final particulate matter control device inlet during the most recent dioxin/furan test demonstrating compliance with the applicable standard for MWC organics specified under § 60.53a. If more than one particulate matter control device is used in series at the affected facility, the maximum 4-hour block average temperature is measured at the final particulate matter control device.

Maximum demonstrated MWC unit load means the maximum 4-hour block average MWC unit load achieved during the most recent dioxin/furan test demonstrating compliance with the applicable standard for MWC organics specified under § 60.53a.

Medical waste means any solid waste which is generated in the diagnosis, treatment, or immunization of human beings or animals, in research pertaining thereto, or in production or testing of biologicals. Medical waste does not include any hazardous waste identified under subtitle C of the Resource Conservation and Recovery Act or any household waste as defined in regulations under subtitle C of the Resource Conservation and Recovery Act.

Modular excess air MWC means a combustor that combusts MSW and that is not field-erected and has multiple combustion chambers, all of which are designed to operate at conditions with combustion air amounts in excess of theoretical air requirements.

Modular starved air MWC means a combustor that combusts MSW and that is not field-erected and has multiple combustion chambers in which the primary combustion chamber is designed to operate at substoichiometric conditions.

Municipal-type solid waste or MSW means household, commercial/retail, and/or institutional waste. Household waste includes material discarded by single and multiple residential dwellings, hotels, motels, and other similar permanent or temporary housing establishments or facilities. Commercial/retail waste includes material discarded by stores, offices, restaurants, warehouses, nonmanufacturing activities at industrial

STATIONARY SOURCES

facilities, and other similar establishments or facilities. Institutional waste includes material discarded by schools, hospitals, nonmanufacturing activities at prisons and government facilities and other similar establishments or facilities. Household, commercial/retail, and institutional waste do not include sewage, wood pallets, construction and demolition wastes, industrial process or manufacturing wastes, or motor vehicles (including motor vehicle parts or vehicle fluff). Municipal-type solid waste does include motor vehicle maintenance materials, limited to vehicle batteries, used motor oil, and tires. Municipal type solid waste does not include wastes that are solely segregated medical wastes. However, any mixture of segregated medical wastes and other wastes which contains more than 30 percent waste medical waste discards, is considered to be municipal-type solid waste.

Municipal waste combustor or MWC or MWC unit means any device that combusts, solid, liquid, or gasified MSW including, but not limited to, field-erected incinerators (with or without heat recovery), modular incinerators (starved air or excess air), boilers (i.e., steam generating units), furnaces (whether suspension-fired, grate-fired, mass-fired, or fluidized bed-fired) and gasification/combustion units. This does not include combustion units, engines, or other devices that combust landfill gases collected by landfill gas collection systems.

MWC acid gases means all acid gases emitted in the exhaust gases from MWC units including, but not limited to, sulfur dioxide and hydrogen chloride gases.

MWC metals means metals and metal compounds emitted in the exhaust gases from MWC units.

MWC organics means organic compounds emitted in the exhaust gases from MWC units and includes total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans.

MWC plant means one or more MWC units at the same location for which construction, modification, or reconstruction is commenced after December 20, 1989.

MWC plant capacity means the aggregate MWC unit capacity of all MWC units at an MWC plant for which construction, modification, or reconstruction commenced after December 20, 1989. Any MWC units for which construction, modification, or reconstruction is commenced on or before December 20, 1989, are not included for determining applicability under this subpart.

MCW unit capacity means the maximum design charging rate of an MWC unit expressed in megagrams per

day (tons per day) of MSW combusted, calculated according to the procedures under § 60.58a, paragraph (j). Municipal waste combustor unit capacity is calculated using a design heating value of 10,500 kilojoules per kilogram (4,500 British thermal units per pound) for MSW and 19,800 kilojoules per kilogram (8,500 British thermal units per pound) for medical waste. The calculational procedures under § 60.58a(j) include procedures for determining MWC unit capacity for batch MWC's and cofired combustors and combustors firing mixtures of medical waste and other MSW.

Particulate matter means total particulate matter emitted from MWC units as measured by Method 5 (see § 60.58a).

Potential hydrogen chloride emission rate means the hydrogen chloride emission rate that would occur from combustion of MSW in the absence of any hydrogen chloride emissions control.

Potential sulfur dioxide emission rate means the sulfur dioxide emission rate that would occur from combustion of MSW in the absence of any sulfur dioxide emissions control.

Refuse-derived fuel or RDF means a type of MSW produced by processing MSW through shredding and size classification.

This includes all classes of RDF including low density fluff RDF through densified RDF and RDF fuel pellets.

RDF stoker means a steam generating unit that combusts RDF in a semi-suspension firing mode using air-fed distributors.

Same location means the same or contiguous property that is under common ownership or control, including properties that are separated only by a street, road, highway, or other public right-of-way. Common ownership or control includes properties that are owned, leased, or operated by the same entity, parent entity, subsidiary, subdivision, or any combination thereof, including any municipality or other governmental unit, or any quasigovernmental authority (e.g., a public utility district or regional waste disposal authority).

Shift supervisor means the person in direct charge and control of the operation of an MWC and who is responsible for on-site supervision, technical direction, management, and overall performance of the facility during an assigned shift.

Standard conditions means a temperature of 293° Kelvin (68° Fahrenheit) and a pressure of 101.3 kilopascals (29.92 inches of mercury).

Twenty-four hour daily average or **24-hour daily average** means the arithmetic

or geometric mean (as specified in § 60.58a (e), (g), or (h) as applicable) of all hourly emission rates when the affected facility is operating and firing MSW measured over a 24-hour period between 12 midnight and the following midnight.

§ 60.52a Standard for municipal waste combustor metals.

(a) On and after the date on which the initial compliance test is completed or is required to be completed under § 60.8, no owner or operator of an affected facility located within a large MWC plant shall cause to be discharged into the atmosphere from that affected facility any gases that contain particulate matter in excess of 34 milligrams per dry standard cubic meter (0.015 grains per dry standard cubic foot), corrected to 7 percent oxygen (dry basis).

(b) On and after the date on which the initial compliance test is completed or is required to be completed under § 60.8, no owner or operator of an affected facility subject to the particulate matter emission limit under paragraph (a) of this section shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than 10 percent opacity (6-minute average).

(c) [Reserved]

§ 60.53a Standard for municipal waste combustor organics.

(a) [Reserved]

(b) On and after the date on which the initial compliance test is completed or is required to be completed under § 60.8, no owner or operator of an affected facility located within a large MWC plant shall cause to be discharged into the atmosphere from that affected facility any gases that contain dioxin/furan emissions that exceed 30 nanograms per dry standard cubic meter (12 grains per billion dry standard cubic feet), corrected to 7 percent oxygen (dry basis).

§ 60.54a Standard for municipal waste combustor acid gases.

(a) [Reserved]

(b) [Reserved]

(c) On and after the date on which the initial compliance test is completed or is required to be completed under § 60.8, no owner or operator of an affected facility located within a large MWC plant shall cause to be discharged into the atmosphere from that affected facility any gases that contain sulfur dioxide in excess of 20 percent of the potential sulfur dioxide emission rate (80 percent reduction by weight or

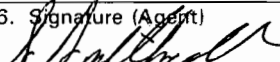
SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to: Mr. Michael L. Riddle Technical Director Seminole Kraft Corporation 9469 Eastport Road P. O. Box 26998 Jacksonville, FL 32218-0998	4a. Article Number P 832 538 767
5. Signature (Addressee)	4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature (Agent) 	7. Date of Delivery 1-27-92
	8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, October 1990

U.S. GPO: 1990-273-861

DOMESTIC RETURN RECEIPT

P 832 538 767



Certified Mail Receipt

No Insurance Coverage Provided
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 (See Reverse)

PS Form 3800, June 1990

Sent to	
Mr. Michael L. Riddle, SKC	
Street & No.	
P. O. Box 26998	
P.O., State & ZIP Code	
Jacksonville, FL 32218-0998	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 1-23-92	



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 23, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Michael L. Riddle
Technical Director
Seminole Kraft Corporation
9469 Eastport Road
P.O. Box 26998
Jacksonville, Florida 32218-0998

Dear Mr. Riddle:

The Department's Bureau of Air Regulation, the Duval County's Air Quality Division, and the U.S. EPA's Region IV, have reviewed your letters of November 12 and 18, 1991, which identifies the proposed supplementary fuel stream (i.e., recycle rejects) that will be combusted in the Nos. 1 & 2 Bark Boilers along with the current fuels (i.e., carbonaceous and fuel oil) during the interim period prior to deactivation of these units/sources as required by Condition II D of the AES/Cedar Bay Site Certification. To avoid the affected sources being made subject to the regulations of 40 CFR 60, Subpart Ea (Municipal Waste Combustors), Seminole Kraft Corporation will need to get the affected source(s) classified as "cofired combustor(s)" pursuant to 40 CFR 60.51a. This requires a federally enforceable permit limiting each unit/source to combusting a fuel feed stream, 30% or less of the weight of which is comprised, in aggregate, of MSW or RDF as measured on a 24-hour basis. In order to do this, please submit an application for each affected source, along with the appropriate processing fee, to the Department's Bureau of Air Regulation.

If there are any questions, please call Mr. Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,

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

Mr. Michael L. Riddle
Page Two

CHF/BM/rbm

Attachments

c: A. Kutyna, NED
R. Roberson, AQD
G. Smallridge, Esq., DER
R. Donelan, Esq., DER
G. Radlinski, Esq., JOGC
G. Worley, EPA
L. Stanley, SKC
C. Barton, SKC
T. Cole, Esq., OHF&C

Attachments



Seminole Kraft Corporation

Jacksonville Mill

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

November 6, 1991

904 751-6400

RECEIVED

NOV 12 1991

Bureau of
Air Regulation

Mr. Clair Fancy, Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

In September you met with Stone Container representatives, Mr. Curt Barton and Mr. Terry Cole, concerning Seminole Kraft Corporation's request to burn recycled fiber rejects in the bark boilers. This request was for the period of time between the mill conversion to recycled fiber operation in the Summer/Fall 1992 and AES Compliance testing (Spring 1994). In a July 23, 1991 letter to Mr. Steve Smallwood, it was stated that the rejects would be less than 25% of the fuel and would not result in the increase of allowable emissions or heat input.

At the meeting you expressed three concerns: 1) Of the estimated 10% plastic content, how much is chlorinated plastic, 2) is there a danger of increased metals emissions from the estimated 15% inorganic portion, and 3) will there be a significant increase in VOC emissions. During the past month, we have initiated several projects to help address these concerns.

Quantity of Chlorinated Plastic

Stone Container's Missoula, Montana mill has a new recycled fiber plant which is similar in operation, reject removal and burning, and raw material feed to the one being constructed at Seminole Kraft. A typical 750 pound bale of recycled fiber was broken open and hand sorted for plastic material. While most of the plastic could not be identified as to original use, nearly all of it fell into one of two categories; strapping or bags. Further, the total 2 1/2 pounds of retrieved plastic (0.3% of the bale weight) was nearly equally divided between the two fractions. These two samples were sent to Galbraith Laboratories for chlorine analyses and the results are included in Appendix I.

The average chlorine content, 190 ppm, is low and is comparable with the chlorine content of bark, 153 ppm, (Appendix II). Total chlorine contribution from the plastic is 190 ppm CH x 0.3% plastic = 0.0001%.

Mr. Clair Fancy, Chief
November 4, 1991
Page 2

Inorganic Fraction of Recycle Rejects

Again, our Missoula, Montana operation was used to provide the necessary data. Samples of actual recycle fiber reject material was taken from the collection bin just prior to burning. The samples were ashed and the results (Appendix III) revealed that the inorganic portion was 1.43% which is much lower than the original estimate of 15% and, in fact, is lower than the inorganic fraction found in bark, 3.4%, (Appendix II). As a second check, a sample of recycle fiber rejects from Stone Container's Florence, South Carolina mill was also ashed. The inorganic portion was found to be 1.23% (Appendix IV) which agrees with the Missoula results. This low ash content is similar to carbonaceous fuels presently being burned in the bark boilers, and indicates there should be no increase in metal emissions resulting from burning recycle fiber rejects.

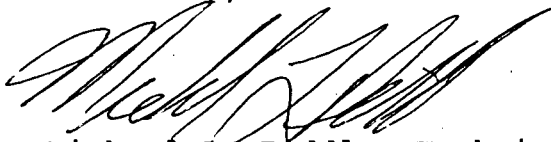
VOC Emissions

As you suggested at the September meeting, the best way of ascertaining that there will be no significant increase in VOC emission is to conduct a VOC stack test before and after the introduction of recycle fiber rejects to the bark boilers. Seminole Kraft agrees to conduct these tests.

Summary

In summary, our projects portray a burnable recycle fiber reject feed containing 98.3% fiber, 1.4% inorganic (sand, glass, etc.) and 0.3% plastic which contained only 190 ppm chlorine. We trust these data adequately answer your concerns and that we have demonstrated that this interim burning of recycle fiber rejects will have no environmental impact.

Sincerely,



Michael E. Riddle, Technical Director
Craig Hurd, Regional Environmental Manager

/pt

cc: L.A. Stanley
Terry Cole
Curt Barton

CHF/BA/PL
Bruce Mitchell
Andy Kutyna, NED
Ron Roberson, BESO

} 11-12-91 fan



Stone Container Corporation

Missoula Mill

Mullan Road
P.O. Box 4707

Containerboard and Paper Division

Missoula, Montana 59806-4707

APPENDIX I

406 626-4451

Oct 2, 1991

Dear Mike:

Here it is. The plastic that was contained in a bale that weighed approximately 750 lb. Let me know what you find regarding percent PVC after your investigation is over.

Best Regards,
Jenny Brown

Separated	in two piles by Seminole.	
<u>straps/tape</u>	<u>bags</u>	
412.2 grams	737.7 grams	total 1149.9 grams
		or 2.5 pounds

cc. Craig Hood.

GALBRAITH

Laboratories, Inc.

QUANTITATIVE MICROANALYSES
ORGANIC — INORGANIC
PHONE 615/546-1335 FAX 615/546-7209

HARRY W. GALBRAITH, Ph.D.
CHAIRMAN OF THE BOARD
KENNETH S. WOODS
PRESIDENT
VELMA M. RUSSELL
SECRETARY-TREASURER
DAVID J. STROM
SENIOR VICE-PRESIDENT
GAIL R. HUTCHENS
EXECUTIVE VICE-PRESIDENT
WILLIAM M. LONGMIRE
VICE-PRESIDENT
TECHNICAL SERVICES

Mr. Gene Doss
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

October 21, 1991

Received: Oct. 16th
PO#: 11423

Dear Mr. Doss:

Analysis of your compound gave the following results:

Your #,	Our #,	ppm Chlorine,
A <i>strap/tape</i>	T-3677	270
B <i>bags</i>	T-3678	109

Sincerely yours,

GALBRAITH LABORATORIES, INC.

Gail R. Hutchens
Gail R. Hutchens
Exec. Vice-President

GRH:sla

APPENDIX II

Average of 7 attached bark tests.

Ash = 3.4%

Chlorine = 153 ppm



TECHNICAL SERVICES, INC.

ENVIRONMENTAL CONSULTANTS — INDUSTRIAL CHEMISTS

OFFICE 2471 SWAN ST. — P.O. BOX 52329

LABORATORIES 103-107 STOCKTON STREET

JACKSONVILLE, FLORIDA 32201

(904) 353-5761



Laboratory No. 82968

February 24, 1988

Sample of Bark

Date Received 02/16/88

For Seminole Kraft Corporation, P.O. Box 26998, Jacksonville, Florida 32218
Attention: Mr. Hodges

Marks: 02/16/88

CERTIFICATE OF ANALYSIS OR TESTS

		<u>Method</u>	<u>Date/Time</u>	<u>Analyst</u>
BTU/lb (Dry Basis)	6,971	ASTM D2015	02/17/88-1525	RK
Carbon (Dry Basis)	50.11 %			
Hydrogen (Dry Basis)	6.08 %			
Nitrogen (Dry Basis)	0.26 %			
Sulfur (Dry Basis)	0.012 %	ASTM D3177	02/18/88-0911	RK
Chloride (Dry Basis)	0.061 %	ASTM D808	02/18/88-1341	RK
Oxygen	41.67 %	By Difference		
Ash (Dry Basis)	1.804 %	ASTM D3174	02/17/88-1427	RK
Moisture (as received)	34.89 %	ASTM D3172	02/17/88-0912	RK

368 ppm as Chlorine
 calculated by M. Riddle 10/31/91
 Assume Chloride = NaCl
 Chlorine = 60.3% of chloride

Respectfully submitted,

TECHNICAL SERVICES, INC.

BY Harvey C. Gray, Jr.

GALBRAITH

Laboratories, Inc.

QUANTITATIVE MICROANALYSES

ORGANIC — INORGANIC

PHONE 615/546-1335 FAX 615/546-7209

HARRY W. GALBRAITH, PH.D.
CHAIRMAN OF THE BOARD
KENNETH S. WOODS
PRESIDENT
VELMA M. RUSSELL
SECRETARY-TREASURER
DAVID J. STROM
SENIOR VICE-PRESIDENT
GAIL R. HUTCHENS
EXECUTIVE VICE-PRESIDENT
WILLIAM M. LONGMIRE
VICE-PRESIDENT
TECHNICAL SERVICES

Mr. G. Doss
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

September 10, 1991

Received: August 28th
PO#: 10441

Dear Mr. Doss:

(Bark)
Analysis of your compound gave the following results:

Your #,	Our #,	Analyses,	
1	S-6602	As Received,	
		% Moisture	41.76
		% Ash	2.15
		Dry Basis,	
		% Carbon	51.13
		% Hydrogen	5.73
		% Kjeldahl Nitrogen	0.15
		ppm Sulfur	228
		ppm Chlorine	91
		% Ash	3.70
		% Oxygen (By Diff)	39.41
2	S-6603	As Received,	
		% Moisture	44.91
		% Ash	3.48
		Dry Basis,	
		% Carbon	46.61
		% Hydrogen	5.78
		% Kjeldahl Nitrogen	0.12
		ppm Sulfur	1247
		ppm Chlorine	336
		% Ash	6.31
		% Oxygen (By Diff)	41.14

Mr. Doss
Page 2
September 10, 1991

Your #,	Our #,	Analyses,	
3	S-6604	As Received,	
		% Moisture	40.99
		% Ash	1.28
		Dry Basis,	
		% Carbon	52.79
		% Hydrogen	5.72
		% Kjeldahl Nitrogen	0.19
		ppm Sulfur	272
		ppm Chlorine	97
		% Ash	2.17
		% Oxygen (By Diff)	39.28
4	S-6605	As Received,	
		% Moisture	40.16
		% Ash	1.96
		Dry Basis,	
		% Carbon	51.96
		% Hydrogen	5.65
		% Kjeldahl Nitrogen	0.15
		ppm Sulfur	245
		ppm Chlorine	80
		% Ash	3.27
		% Oxygen (By Diff)	39.09
5	S-6606	As Received,	
		% Moisture	63.15
		% Ash	1.69
		Dry Basis,	
		% Carbon	51.05
		% Hydrogen	5.50
		% Kjeldahl Nitrogen	0.27
		ppm Sulfur	663
		ppm Chlorine	79
		% Ash	4.58
		% Oxygen (By Diff)	38.80

Mr. Doss
Page 3
September 10, 1991

Your #,	Our #,	Analyses,	
6	S-6607	As Received,	
		% Moisture	57.49
		% Ash	0.87
		Dry Basis,	
		% Carbon	51.84
		% Hydrogen	5.59
		% Kjeldahl Nitrogen	0.34
		ppm Sulfur	348
		ppm Chlorine	19
		% Ash	2.04
		% Oxygen (By Diff)	40.49

Sincerely yours,

GALBRAITH LABORATORIES, INC.

Gail R. Hutchens/dse

Gail R. Hutchens
Exec. Vice-President

GRH:dse



Stone Container Corporation

Missoula Mill

APPENDIX III

Mullan Road
P.O. Box 4707
Missoula, Montana 59806-4707

Containerboard and Paper Division

October 30, 1991

406 626-4451

Craig Hurd
Regional Manager
Environmental Services
Stone Container Corporation
Technology and Environmental Center
2150 Parklake Drive, Suite 400
Atlanta, GA 30345

Dear Craig,

As you requested, I had a sample of our burnable wastes tested for ash content. The averaged ash content was 1.43%.

A representative sample of our burnable OCC rejects was collected from the central collection bin. These rejects are a combination of rejects from: 1) the hydrapurge/selectpurge system, 2) the Wandel vibration screens (rejects from the coarse screens) and 3) the hydradenser (rejects from the tertiary slotted screen and waxes and stickies from the Krofta clarifier). I have included a print out of the basic scheme of the Missoula OCC plant from the Honeywell computer controls for reference.

This sample was divided into three parts and dried for 24 hours and weighed on a bone dry basis. The samples were then brought gradually up to approximately 575 degrees Centigrade in our muffle furnace and burned at that temperature for approximately three hours. The samples were then cooled for about one hour in a desiccator and weighed. The weights, in grams, are recorded below along with the calculated inorganic fraction of the sample in percent.

	<u>Bone Dry</u>	<u>Ash</u>	<u>%Ash</u>
Sample 1	1.7913	0.0237	1.323
Sample 2	0.8943	0.0133	1.487
Sample 3	0.9651	0.0152	1.606
Average:	1.2169	0.0174	1.430 (using the average weights.)

If you have any questions, please let me know.

Sincerely,

Jenny Brown
Quality Control Engineer

APPENDIX IV

A representative sample off recycle fiber rejects from the Stone Container mill in Florence, South Carolina was dried and then ashed in a muffle furnace at 600°C.

Bone Dry Weight:

58.5604	53.6512
- <u>53.5902</u> (crucible)	- <u>53.5902</u>

4.9702 grams	0.0610
--------------	--------

0.0610/4.9702 = 0.0123

= 1.23% Ash

October 22, 1991
Gene Doss



Stone Container Corporation

Technology and Engineering

Containerboard and Paper Division

2150 Parklake Drive
Suite 400
Atlanta, Georgia 30345

November 14, 1991

RECEIVED

404 621-6700

NOV 18 1991

Division of Air
Resources Management

Mr. Clair Fancy, Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

On November 6, 1991, you received a letter from Mike Riddle, Technical Director at the Seminole Kraft Paper Mill in Jacksonville, FL which addressed your concerns over the burning of recycled fiber rejects in the bark boilers.

Since sending the letter, we have discovered that the percent plastic value might be misleading. We stated that the plastic was 0.3% which was based on the total recycled fiber bale weight of 750 lbs. The actual reject portion of recycled fiber is approximately 15% or 112 lbs. out of a 750 lb. bale. Therefore, the actual, burnable recycled fiber reject feed contains 96.37% fiber, 1.4% inorganic (sand, glass, etc.) and 2.23% plastic which contains only 190 ppm of chlorine.

We apologize for any confusion that our original calculation may have caused and trust that this letter rectifies any deficiency.

Sincerely,

Craig Hurd
Regional Environmental Manager

bbm

cc: Curt Barton
Terry Cole
Mike Riddle
Larry Stanley
B. Mitchell
A. Nuttison, NE Dist.
R. Rollerson, OESD

MEDIA HOT SHEET

BEST AVAILABLE COPY

Date: 12/19/91

Reporter: Sue Yanello

At (Newspaper, T.V., Radio, etc.): Channel 12
FAX

cc: Steve Smallwood
Richard Donelan
Bobr Fancy
Bary Andrews
Preston Lewis
Gary Smallbridge
Buck Owen

From: Bruce Mitchell
Division: of Air Resources Management
Bureau: of Air Regulation
Phone: 488-1344

Topic of Call: AES - Cedar Bay / Seminole Knatt Co.
meeting held @ DER, Rm 609 on 12/19/91

- Questions asked:
1. What was the meeting about?
 2. Who were the actors in the meeting?
 3. What are the ramifications of the meeting? What will happen next?

Deadline:

Summary of Conversation (use remainder of sheet, and back, if necessary):

① The meeting was concerning the power plant certification issued by the Governor-Cabinet and whether or not AES-CB/SKC was misleading in their information regarding the permanent shut-down during the certification project. As required in the certification, certain power (steam & electrical) sources are to be permanently shut-down and their permits surrendered to the Department. Since SKC may not be able to acquire the necessary steam demand from AES-CB and their electrical demand from FEA, then SKC is considering the potential of re-permitting one of the ~~designated~~ ^{designated} power sources for shut-down or the permitting of a new power source. However, no violation of the certification has occurred to date.

② Steve Smallwood (Division Director of DARM), Terry Cole @ Derfel Hoffman Fernan and Palo the lawyer for BESD? (she knew of him). Richard Donelan @ OAC.

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. *Bruce Mitchell*
2. *Re - Cedar Bay Hot Sheet*
- 3.
- 4.

Remarks:

*Thanks for TV reporter "Hot Sheet"!
You do a Very good job of
Providing "facts" to answer
media question. I appreciate
you keeping me and others
informed!*

*cc Smallwood
Dondan
Terry
Andrews
Smallwood
over*

From *Pector Lewis*

Date *12/23/91*
Phone



Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

December 13, 1991

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

RECEIVED

DEC 18 1991

DIVISION OF AIR
RESOURCES MANAGEMENT

**Subject: Progress Report on OCC Conversion Project as Required
for Construction Permits AC16-168607 and AC16-144791**

Dear Mr. Fancy:

This report is in compliance with Specific Condition 15(c) of AC16-168607 and Specific Condition 11 of AC16-144791. This semi-annual update reports progress made on the project as of December 1, 1991.

The two recycle lines work is progressing steadily, however, we believe we are 1.5 to 2 months behind our internal schedule for completion of this portion of our project. Over 95% of the major equipment for the two recycle lines is installed on its foundation and rough aligned.

Piping work to inter connect the recycle lines is 50% complete. Electrical runs and instrumentation is just started and is less than 5% complete.

The outside storage pads are 90% complete with much of the remaining work to be completed shortly after the first of the year.

Final assembly and check-out of the major paper machine equipment is being completed in December, this equipment will begin to be shipped to our site during the first quarter 1992. Piping and inter connections from the OCC plant to the paper machine will begin in the first quarter of 1991.

Although we are behind our internal schedule we still believe we will start up in the last summer of 1992. The next scheduled update will be issued in June 1992.

Mr. Clair H. Fancy
December 13, 1991
Page 2

If you have any questions or if you and your staff would like to visit the site, please contact me at 904/751-6400, ext. 252.

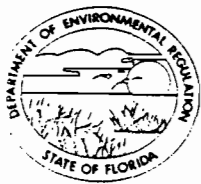
Sincerely,



Michael L. Riddle
Manager, Technical Services

/pt

cc: L.A. Stanley
Curt Barton
Craig Hurd



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: <u>Bruce</u>	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Steve Smallwood
Gary Smallridge
Richard Donelan
Buck Oven
Bruce Mitchell
Andy Kutyna, NE District
Steve Pace, BESD
Gregg Radlinski, BESD

FROM: Clair Fancy *CAF*

DATE: December 12, 1991

SUBJ: Meeting with Seminole Kraft Corporation

A meeting that is scheduled to discuss AES Cedar Bay/Seminole Kraft Corporation air permitting and site certification situation at DER for December 19, 11:00 a.m. - 1:00 p.m. on the 6th Floor, room 611.

Thank you.

CHF/kt

cc: T. Cole, Ortel & Hoffman

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
KENNETH G. OERTEL
HAROLD F. X. PURNELL
PATRICIA A. RENOVITCH
SCOTT SHIRLEY
THOMAS G. TOMASELLO
W. DAVID WATKINS

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TALLAHASSEE, FLORIDA 32301

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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)

December 2, 1991

Gregory G. Radlinski, Assistant Counsel
Environmental Law Division
City of Jacksonville
Suite 715 - Town Center
4251 West Church Street
Jacksonville, Florida 32202-4156

RECEIVED
DEC 2 1991
Division of Air
Resources Management

RE: Seminole Kraft Corporation, Bark Boilers

Dear Mr. Radlinski:

This will respond to your letter of November 14, 1991 regarding continued operation of certain Seminole Kraft bark and power boilers after commercial operation of the AES Cedar Bay Facility was reached.

I do not believe there is any issue involving the odor settlement between the City and Seminole Kraft. The settlement related to agreeing to shut down certain TRS specified sources, including the recovery boilers. Seminole Kraft is on schedule to meet the specified dates in that consent judgment. That settlement did not include or have any relevance to operation of the power or bark boilers. The settlement specifically reserved the creditable emission reductions from retiring the old recovery boilers.

The bark and power boilers were offered as creditable emission reductions as part of the AES power plant siting process. The creditable emissions remain intact and available to AES and Cedar Bay. At the time the application was filed Seminole Kraft planned to replace the three old recovery boilers with one large new recovery boiler. They planned to retire the power boilers and burn the bark in the AES circulating fluidized bed boilers. Based upon market conditions, the desire of the City and the State to promote additional recycling in the state and the desire to make a much larger reduction in odors by eliminating the Kraft pulping process from the mill, the proposal was later changed to eliminate the new recovery boiler (which had been permitted) and instead to convert the mill to a recycled fiber facility. It was at that point that agreement was reached with the City and later filed in circuit court resolving the pending odor questions. Meetings were held with the City and the State to discuss


Mr. Gregory G. Radlinski
December 2, 1991
Page 2

the proposed conditions of certification relating to shutting down the bark and power boilers. It was agreed this condition did not preclude Seminole Kraft from applying for additional permits for new sources in the future, utilizing the recovery boiler offsets, should Seminole be able to demonstrate compliance with applicable environmental requirements. The City made clear that should Seminole Kraft file such applications that it would expect NSPS requirements to be met. Although it is not clear NSPS requirements are applicable, the application that Seminole Kraft files will honor the City's request that NSPS limitations be met.

I have attached copies of relevant correspondence from the Department of Environmental Regulation, EPA and Seminole Kraft for your information. It should be noted for informational purposes that Seminole Kraft also has provided notice to DER that upon completion of the recycle fiber project, there will be a change in the mix of carbonaceous fuel burned in the bark boilers in the interim between the startup of the new recycled fiber process next year and commercial operation of AES.

As you will see from the correspondence Seminole Kraft has been candid and open on this issue since the possibility of converting the application for a new recovery boiler to recycled fiber project for the entire mill was first discussed and later approved by the City and the State. Once you have had the opportunity to review these materials and this letter, we will be glad to meet with you to discuss this in more detail. Please feel free to call me should you have any questions.

Sincerely,


Terry Cole

TC/kp

cc: Steve Smallwood
Richard Donellan
Larry Stanley
Curt Barton
Bruce Mitchell



OFFICE OF
GENERAL COUNSEL
CITY OF JACKSONVILLE
SUITE 715 TOWNCENTRE
421 WEST CHURCH STREET
JACKSONVILLE, FLORIDA 32202-4156

JOHN A. DELANEY
GENERAL COUNSEL

TEL (904) 630-4900
FAX (904) 630-4991

RECEIVED

NOV 18 1991

November 14, 1991

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

Terry Cole, Esq.
Oertel, Hoffman, Fernandez & Cole, P.A.
2700 Blair Stone Road, Suite C
P. O. Box 6507
Tallahassee, Florida 32314-6507

RE: Seminole Kraft Corp., Jacksonville Plant, continued boiler use

Dear ^{Terry}Mr. Cole:

Yesterday, Mr. Larry Stanley, the manager of the Seminole Kraft plant in Jacksonville, addressed a group of concerned citizens. He explained Seminole's recent application to change Seminole Kraft's land use classification from light industrial to heavy industrial. At the meeting, he also mentioned that Seminole Kraft would not be receiving all of its steam power from AES Cedar Bay's cogeneration plant, and would continue to operate some of its present boilers. Would you please confirm and explain Seminole Kraft's intentions regarding the existing boilers and the power sharing arrangement with AES.

AES/Cedar Bay and Seminole Kraft, co-applicants for a co-generation plant under Florida's Electric Power Plant Siting Act, have represented that one of the major benefits of the project was elimination of Seminole's inefficient boilers. As Hearing Officer Benton found in his May, 1990, Recommended Order


Construction of the new cogeneration facility will allow the existing bark boilers and oil-fired boilers at the mill to shut down. (cit. omit.) Seminole Kraft is under orders to close down the most egregious of its several air pollution sources, in any event.

Under the Consent Judgment approved by Circuit Judge Darden last December, Seminole Kraft agreed to shut down the old pulp mill by September, 1992, including discontinuing use of the recovery boilers.

Terry Cole, Esq.
November 14, 1991
Page -2-

Mr. Stanley's comments suggest that Seminole Kraft has other plans. If that is true, the City would like those plans explained. If Mr. Stanley is misinformed, your explanation of the true circumstances will help allay our understandable concerns.

Sincerely,


Gregory K. Radlinski
Assistant Counsel
Environmental Law Division

cc:
Councilman Reagan
Councilman Carlucci
Councilman Crescimbeni
General Counsel Delaney
J. Heard, Esq.
R. Pennington, Esq.
Mr. S. Campbell
Mrs. B. Broward
R. G. Haines, Ph.D.
R&ESD

GKR/lou



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

I.D. Number:

31-16-0067-04

Permit/Certification Number:

AO16-149235

Date of Issue:

November 9, 1988

Expiration Date:

May 31, 1993

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-7441.800 N-3365.575

Project:

No. 1 Bark Boiler

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

For the operation of No. 1 Bark Boiler, Combustion Engineering Serial No. 16703 for the the production of 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.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

No. 1 Bark Boiler

Control Equipment

Two sets of 4 each Buell VT Cyclone Separators in series with a Ducon Venturi Scrubber Type VVO

Emission source(s) shall be as follows:

Point

04

Source

No. 1 Bark Boiler

Located at 9469 Eastport Road, Jacksonville, Florida 32229

Supporting documents shall be as follows:

- (1) Permit AO16-71204
- (2) Operating Permit Application dated May 3, 1988
- (3) DER letter approving transfer of permits dated January 12, 1987
- (4) Stack tests (2) performed on October 28, 1987 and November 4, 1987.
- (5) Operation and Maintenance Plan

Permittee:
Seminole Kraft Corporation

I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

31-16-0067-04
AO16-149235
November 9, 1988
May 31, 1993

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)5., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
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% Sulfur)	on Request	*
	Visible Emissions (VE)	On request	EPA RM No. 9

*Sulfur 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 BESD, and shall be reported as the sulfur content by percent (%) weight.

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</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	

Seminole Kraft Corporation
Bark Boilers

I. Current Permit

A. Fuel

1. Carbonaceous Fuel (Bark)
2. No. 6 Fuel Oil (2.27% Sulfur)

B. Boiler Capacity

Max. Rate - 193 mmBtu/hr heat input

C. Normal Operation - 100% Carbonaceous Fuel

D. Abnormal Operation - No. 6 Oil & Carbonaceous Fuel
(Startup, Shutdown, Malfunction, etc.)

E. Allowable Emissions

- PM (Carbonaceous Fuel) 0.2 lb/mmBtu or 38.6 lb/hr
- PM (Oil Fired) 0.1 lb/mmBtu or 19.3 lb/hr
- PM (Combinations of Carbonaceous and Oil - Limited to 193 mmBtu/hr. Allowable PM emissions for any combination shall be calculated on the sum of the individual calculations for carbonaceous and oil fuels.

II. Projected Fuel After Startup of Recycle Operation

A. Fuel

1. Carbonaceous Fuel (Bark & Wastepaper Rejects)
2. No. 6 Fuel Oil (1.0% Sulfur)

B. Boiler Capacity

Max. Rate - 193 mmBtu/hr per boiler

C. Normal Operation - 100% Carbonaceous Fuel

D. Abnormal Operation - No. 6 Oil & Carbonaceous Fuel

E. Carbonaceous Fuel Data

1. Heat Value
Bark (Dry) - 6500 Btu/#
Wastepaper Rejects (Dry) - 8000 Btu/#
2. Fuel Quantity
Bark (Dry) - 11.15 Tons/hr
3. Firing Rate
Wastepaper Rejects (Dry) - 3 Tons/hr
Bark Heat Input = 6500 (11.15) 2000 = 145 mmBtu/hr
Wastepaper Rejects = 8000 (3) 2000 = 48 mmBtu/hr
Total Heat Input = 193 mmBtu/hr

F. Allowable Emissions

- PM (Carbonaceous Fuel) = 0.2 lb/mmBtu or 38.6 lb/hr
PM (Oil Fired) = 0.1 lb/mmBtu or 19.3 lb/hr
PM (Combinations of Carbonaceous Fuel and Oil limited to 193 mmBtu/hr. Allowable PM emissions for any combination shall be calculated based on the sum of the individual calculations for Carbonaceous and Oil Fuels.

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
KENNETH G. OERTEL
HAROLD F. X. PURNELL
PATRICIA A. RENOVITCH
SCOTT SHIRLEY
THOMAS G. TOMASELLO
W. DAVID WATKINS

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2700 BLAIR STONE ROAD
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MAILING ADDRESS:
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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 26, 1990

Mr. Steve Smallwood
Bureau of Air Quality Management
Department of Environmental Regula
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Post-It™ brand fax transmittal memo 7671		# of pages ▶
To	Chick Schrenk	From
Co.		Co.
Dept.		Phone #
Fax #	512 855 7312	Fax #

RE: Refurbishment or replacement of
Seminole Kraft Bark Boilers; Changing Fuel Mix

Dear Steve:

The purpose of this letter is to confirm your previous discussion with Julie Blunden, Curt Barton, and me concerning refurbishment or replacement of existing bark boilers, or the use of such boilers to burn recycled fiber rejects as well as bark.

As you know, Seminole Kraft Corporation proposes to convert its Jacksonville mill to a 100% recycle operation. This will benefit the community in many ways, including reducing the need to landfill used corrugated containers and eliminating all TRS emissions.

In processing the recycled fiber a certain amount of rejects will be produced which must be burned or landfilled. Due to the volume of rejects generated over the long term, incineration is preferred. The fiber rejects have a high energy content and they can be efficiently burned with bark (also generated on-site) in boilers adequate for this purpose.

The DER permitting requirements for boilers used for this purpose would depend on whether the AES Cedar Bay/Seminole Kraft Co-generation Project is ultimately certified.

Permitting Requirements if AES Cedar Bay/Seminole Kraft Project is Certified:

If the Co-generation Project is certified, Condition IID of the proposed Conditions of Certification (revised 7-19-90) requires

Mr. Steve Smallwood
October 26, 1990
Page 2

that Power Boiler Nos. 1 through 3 and Bark Boiler Nos. 1 and 2 are to be "permanently shut down and made incapable of operation" at the time initial compliance tests on the AESCB boilers are completed. This provision constitutes a federally enforceable permit condition upon final action by the Siting Board and Secretary.

In light of this condition, the same permitting requirements apply irrespective of whether a new boiler is constructed to burn bark and fiber rejects or an existing boiler is refurbished for this purpose. These requirements would consist of the applicable federal and state New Source Performance Standard; assurance that ambient air quality standards will not be violated; and Prevention of Significant Deterioration (PSD) review in the absence of creditable emission reductions such as those resulting from the shut-down of the Kraft Recovery Boilers. See Rule 17-2.500, F.A.C. There is no prohibition against applying for a new source permit because of a federally enforceable condition requiring retirement of an existing source.

Permitting Requirements for Bark Boilers if AES Cedar Bay/Seminole Kraft Project Not Certified:

The permitting requirements are different, however, if the proposed Co-generation Project is not certified. The existing Bark Boiler(s) are capable of being used to burn the fiber rejects as well as bark.

It appears that the change in fuel content -- from 100% bark to a 75% bark/25% fiber reject mix -- does not constitute a modification for purposes of applying new source performance standards or PSD review. This is because of the way "modification" is defined and the specific exemption to that definition.

Modification is defined in 40 CFR §60.2 (also found in Chapter 17-2, F.A.C.) as:

Any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

Mr. Steve Smallwood
October 26, 1990
Page 3

There is, however, an exception to the definition which applies to use of an alternative fuel or raw material if prior to the applicable date of the regulation the existing facility was capable of accommodating an alternative fuel use. A "facility" is capable of accommodating an alternative fuel use if the use could be accomplished under the facility's construction specifications as amended prior to the change. 40 CFR §60.14(e)(4).

DER rules contain a similar exemption. Rule 17-2.500(2)(c)4, F.A.C., exempts the use of an alternative fuel which the facility was capable of accommodating before January 6, 1975, unless such change is prohibited under any federally enforceable permit condition established after January 6, 1975.

Since prior to January 6, 1975, the bark boilers were capable of burning the reject fibers in the percentages anticipated, and still are, they fall within the exception to the general NSPS requirement.

EPA and DER rules also subject "major modifications" of existing facilities to PSD review. Such modifications are generally defined as any physical change in, or change in the method of operation of, a major stationary source which would result in a significant net emissions increase of any pollutants subject to regulation. The rules also contain, however, an exemption for a physical change or change in method of operation for the use of an alternative fuel or raw material which the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition established after January 6, 1975. 40 CFR 52.21(2)(d); see also §17-2.500(2)(c)4., F.A.C.

Consequently, under the situation described, the switch in fuel mixture would not be a major modification requiring PDS review. Seminole Kraft would, however, notify the Department before burning the reject fibers and answer any questions concerning it.

Mr. Steve Smallwood
October 26, 1990
Page 4

I would appreciate your confirming my understanding of our discussion. Please do not hesitate to provide corrections or clarification where needed. Thank you for your cooperation.

Sincerely,


Terry Cole

TC/kp

cc: Curt Barton
Julie Blunden

s-smallw.ltr



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 (AESCB) 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.

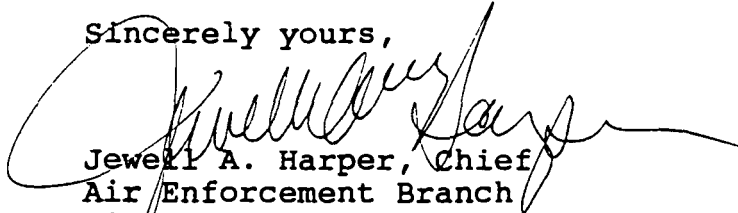
If the bark boilers were not capable of firing the alternative fuel prior to August 17, 1971, then they could be subject to either Subparts D or E or both if an increase in the emission rate of a regulated pollutant occurs. In addition, in order for Subpart E to apply, the combination of bark and fiber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

1003 -
new print



Stone Container Corporation

Technology and Engineering

Containerboard and Paper Division

2150 Parklake Drive
Suite 400
Atlanta, Georgia 30345

404 621-6700

November 14, 1991

RECEIVED
NOV 18 1991

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

Mr. Clair Fancy, Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

On November 6, 1991, you received a letter from Mike Riddle, Technical Director at the Seminole Kraft Paper Mill in Jacksonville, FL which addressed your concerns over the burning of recycled fiber rejects in the bark boilers.

Since sending the letter, we have discovered that the percent plastic value might be misleading. We stated that the plastic was 0.3% which was based on the total recycled fiber bale weight of 750 lbs. The actual reject portion of recycled fiber is approximately 15% or 112 lbs. out of a 750 lb. bale. Therefore, the actual, burnable recycled fiber reject feed contains 96.37% fiber, 1.4% inorganic (sand, glass, etc.) and 2.23% plastic which contains only 190 ppm of chlorine.

We apologize for any confusion that our original calculation may have caused and trust that this letter rectifies any deficiency.

Sincerely,

Craig Hurd
Regional Environmental Manager

bbm

cc: Curt Barton
Terry Cole
Mike Riddle
Larry Stanley



Seminole Kraft Corporation

Jacksonville Mill

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

November 6, 1991

904 751-6400

Mr. Clair Fancy, Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

NOV 8 1991

Dear Mr. Fancy:

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

In September you met with Stone Container representatives, Mr. Curt Barton and Mr. Terry Cole, concerning Seminole Kraft Corporation's request to burn recycled fiber rejects in the bark boilers. This request was for the period of time between the mill conversion to recycled fiber operation in the Summer/Fall 1992 and AES Compliance testing (Spring 1994). In a July 23, 1991 letter to Mr. Steve Smallwood, it was stated that the rejects would be less than 25% of the fuel and would not result in the increase of allowable emissions or heat input.

At the meeting you expressed three concerns: 1) Of the estimated 10% plastic content, how much is chlorinated plastic, 2) is there a danger of increased metals emissions from the estimated 15% inorganic portion, and 3) will there be a significant increase in VOC emissions. During the past month, we have initiated several projects to help address these concerns.

Quantity of Chlorinated Plastic

Stone Container's Missoula, Montana mill has a new recycled fiber plant which is similar in operation, reject removal and burning, and raw material feed to the one being constructed at Seminole Kraft. A typical 750 pound bale of recycled fiber was broken open and hand sorted for plastic material. While most of the plastic could not be identified as to original use, nearly all of it fell into one of two categories; strapping or bags. Further, the total 2 1/2 pounds of retrieved plastic (0.3% of the bale weight) was nearly equally divided between the two fractions. These two samples were sent to Galbraith Laboratories for chlorine analyses and the results are included in Appendix I.

The average chlorine content, 190 ppm, is low and is comparable with the chlorine content of bark, 153 ppm, (Appendix II). Total chlorine contribution from the plastic is 190 ppm CH x 0.3% plastic = 0.0001%.

Mr. Clair Fancy, Chief
November 4, 1991
Page 2

Inorganic Fraction of Recycle Rejects

Again, our Missoula, Montana operation was used to provide the necessary data. Samples of actual recycle fiber reject material was taken from the collection bin just prior to burning. The samples were ashed and the results (Appendix III) revealed that the inorganic portion was 1.43% which is much lower than the original estimate of 15% and, in fact, is lower than the inorganic fraction found in bark, 3.4%, (Appendix II). As a second check, a sample of recycle fiber rejects from Stone Container's Florence, South Carolina mill was also ashed. The inorganic portion was found to be 1.23% (Appendix IV) which agrees with the Missoula results. This low ash content is similar to carbonaceous fuels presently being burned in the bark boilers, and indicates there should be no increase in metal emissions resulting from burning recycle fiber rejects.

VOC Emissions

As you suggested at the September meeting, the best way of ascertaining that there will be no significant increase in VOC emission is to conduct a VOC stack test before and after the introduction of recycle fiber rejects to the bark boilers. Seminole Kraft agrees to conduct these tests.

Summary

In summary, our projects portray a burnable recycle fiber reject feed containing 98.3% fiber, 1.4% inorganic (sand, glass, etc.) and 0.3% plastic which contained only 190 ppm chlorine. We trust these data adequately answer your concerns and that we have demonstrated that this interim burning of recycle fiber rejects will have no environmental impact.

Sincerely,



Michael E. Riddle, Technical Director
Craig Hurd, Regional Environmental Manager

/pt

cc: L.A. Stanley
Terry Cole
Curt Barton



Stone Container Corporation

Missoula Mill

Mullan Road
P.O. Box 4707

Missoula, Montana 59806-4707

Containerboard and Paper Division

APPENDIX I

406 626-4451

Oct 2, 1991

Dear Mike:

Here it is. The plastic that was contained in a bale that weighed approximately 750 lb. Let me know what you find regarding percent PVC after your investigation is over.

Best Regards,
Jimmy Brown

Separated	in two piles by Seminole.	
<u>straps/tape</u>	<u>bags</u>	
412.2 grams	737.7 grams	total 1149.9 grams
		or 2.5 pounds

cc. Craig Hurd.

GALBRAITH

Laboratories, Inc.

QUANTITATIVE MICROANALYSES

ORGANIC — INORGANIC

PHONE 615/546-1335 FAX 615/546-7209

HARRY W. GALBRAITH, Ph.D
CHAIRMAN OF THE BOARD
KENNETH S. WOODS
PRESIDENT
VELMA M. RUSSELL
SECRETARY-TREASURER
DAVID J. STROM
SENIOR VICE-PRESIDENT
GAIL R. HUTCHENS
EXECUTIVE VICE-PRESIDENT
WILLIAM M. LONGMIRE
VICE-PRESIDENT
TECHNICAL SERVICES

Mr. Gene Doss
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

October 21, 1991

Received: Oct. 16th
PO#: 11423

Dear Mr. Doss:

Analysis of your compound gave the following results:

Your #,	Our #,	ppm Chlorine,
A <i>strap/tape</i>	T-3677	270
B <i>bags</i>	T-3678	109

Sincerely yours,

GALBRAITH LABORATORIES, INC.

Gail R. Hutchens
Gail R. Hutchens
Exec. Vice-President

GRH:sla

APPENDIX II

Average of 7 attached bark tests.

Ash = 3.4%

Chlorine = 153 ppm



TECHNICAL SERVICES, INC.

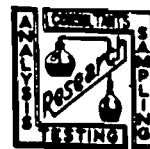
ENVIRONMENTAL CONSULTANTS — INDUSTRIAL CHEMISTS

OFFICE 2471 SWAN ST. — P.O. BOX 52329

LABORATORIES 103-107 STOCKTON STREET

JACKSONVILLE, FLORIDA 32201

(904) 353-5761



Laboratory No. 82968

February 24, 1988

Sample of Bark

Date Received 02/16/88

For Seminole Kraft Corporation, P.O. Box 26998, Jacksonville, Florida 32218
Attention: Mr. Hodges

Marks: 02/16/88

CERTIFICATE OF ANALYSIS OR TESTS

		<u>Method</u>	<u>Date/Time</u>	<u>Analyst</u>
BTU/lb (Dry Basis)	6,971	ASTM D2015	02/17/88-1525	RK
Carbon (Dry Basis)	50.11 %			
Hydrogen (Dry Basis)	6.08 %			
Nitrogen (Dry Basis)	0.26 %			
Sulfur (Dry Basis)	0.012 %	ASTM D3177	02/18/88-0911	RK
Chloride (Dry Basis)	0.061 %	ASTM D808	02/18/88-1341	RK
Oxygen	41.67 %	By Difference		
Ash (Dry Basis)	1.804 %	ASTM D3174	02/17/88-1427	RK
Moisture (as received)	34.89 %	ASTM D3172	02/17/88-0912	RK

*368 ppm as Chlorine
calculated by M. Riddle 10/31/91
Assume Chloride = NaCl
Chlorine = 60.3% of chloride*

Respectfully submitted,

TECHNICAL SERVICES, INC.

BY *Henry C. Gray, Jr.*

GALBRAITH

Laboratories, Inc.

QUANTITATIVE MICROANALYSES

ORGANIC - INORGANIC

PHONE 615/546-1335 FAX 615/546-7209

HARRY W. GALBRAITH, Ph.D.
CHAIRMAN OF THE BOARD
KENNETH S. WOODS
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VELMA M. RUSSELL
SECRETARY-TREASURER
DAVID J. STROM
SENIOR VICE-PRESIDENT
GAIL R. HUTCHENS
EXECUTIVE VICE-PRESIDENT
WILLIAM M. LONGMIRE
VICE-PRESIDENT
TECHNICAL SERVICES

Mr. G. Doss
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

September 10, 1991

Received: August 28th
PO#: 10441

Dear Mr. Doss:

(Bark)
Analysis of your compound gave the following results:

Your #,	Our #,	Analyses,	
1	S-6602	As Received,	
		% Moisture	41.76
		% Ash	2.15
		Dry Basis,	
		% Carbon	51.13
		% Hydrogen	5.73
		% Kjeldahl Nitrogen	0.15
		ppm Sulfur	228
		ppm Chlorine	91
		% Ash	3.70
		% Oxygen (By Diff)	39.41
2	S-6603	As Received,	
		% Moisture	44.91
		% Ash	3.48
		Dry Basis,	
		% Carbon	46.61
		% Hydrogen	5.78
		% Kjeldahl Nitrogen	0.12
		ppm Sulfur	1247
		ppm Chlorine	336
		% Ash	6.31
		% Oxygen (By Diff)	41.14

Mr. Doss
Page 2
September 10, 1991

Your #,	Our #,	Analyses,	
3	S-6604	As Received,	
		% Moisture	40.99
		% Ash	1.28
		Dry Basis,	
		% Carbon	52.79
		% Hydrogen	5.72
		% Kjeldahl Nitrogen	0.19
		ppm Sulfur	272
		ppm Chlorine	97
		% Ash	2.17
		% Oxygen (By Diff)	39.28
4	S-6605	As Received,	
		% Moisture	40.16
		% Ash	1.96
		Dry Basis,	
		% Carbon	51.96
		% Hydrogen	5.65
		% Kjeldahl Nitrogen	0.15
		ppm Sulfur	245
		ppm Chlorine	80
		% Ash	3.27
		% Oxygen (By Diff)	39.09
5	S-6606	As Received,	
		% Moisture	63.15
		% Ash	1.69
		Dry Basis,	
		% Carbon	51.05
		% Hydrogen	5.50
		% Kjeldahl Nitrogen	0.27
		ppm Sulfur	663
		ppm Chlorine	79
		% Ash	4.58
		% Oxygen (By Diff)	38.80

Mr. Doss
Page 3
September 10, 1991

Your #,	Our #,	Analyses,	
6	S-6607	As Received,	
		% Moisture	57.49
		% Ash	0.87
		Dry Basis,	
		% Carbon	51.84
		% Hydrogen	5.59
		% Kjeldahl Nitrogen	0.34
		ppm Sulfur	348
		ppm Chlorine	19
		% Ash	2.04
		% Oxygen (By Diff)	40.49

Sincerely yours,

GALBRAITH LABORATORIES, INC.

Gail R. Hutchens/dse

Gail R. Hutchens
Exec. Vice-President

GRH:dse



Stone Container Corporation

Missoula Mill

APPENDIX III

Mullan Road
P.O. Box 4707
Missoula, Montana 59806-4707

Containerboard and Paper Division

October 30, 1991

406 626-4451

Craig Hurd
Regional Manager
Environmental Services
Stone Container Corporation
Technology and Environmental Center
2150 Parklake Drive, Suite 400
Atlanta, GA 30345

Dear Craig,

As you requested, I had a sample of our burnable wastes tested for ash content. The averaged ash content was 1.43%.

A representative sample of our burnable OCC rejects was collected from the central collection bin. These rejects are a combination of rejects from: 1) the hydrapurge/selectpurge system, 2) the Wandel vibration screens (rejects from the coarse screens) and 3) the hydradenser (rejects from the tertiary slotted screen and waxes and stickies from the Krofta clarifier). I have included a print out of the basic scheme of the Missoula OCC plant from the Honeywell computer controls for reference.

This sample was divided into three parts and dried for 24 hours and weighed on a bone dry basis. The samples were then brought gradually up to approximately 575 degrees Centigrade in our muffle furnace and burned at that temperature for approximately three hours. The samples were then cooled for about one hour in a desiccator and weighed. The weights, in grams, are recorded below along with the calculated inorganic fraction of the sample in percent.

	<u>Bone Dry</u>	<u>Ash</u>	<u>%Ash</u>
Sample 1	1.7913	0.0237	1.323
Sample 2	0.8943	0.0133	1.487
Sample 3	0.9651	0.0152	1.606
Average:	1.2169	0.0174	1.430 (using the average weights.)

If you have any questions, please let me know.

Sincerely,

Jenny Brown
Quality Control Engineer

APPENDIX IV

A representative sample off recycle fiber rejects from the Stone Container mill in Florence, South Carolina was dried and then ashed in a muffle furnace at 600°C.

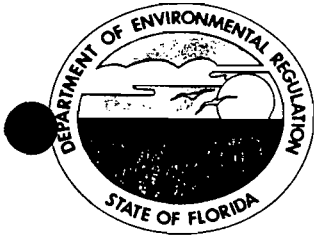
Bone Dry Weight:

58.5604	53.6512
- <u>53.5902</u> (crucible)	- <u>53.5902</u>
4.9702 grams	0.0610

$0.0610/4.9702 = 0.0123$
 $= 1.23\% \text{ Ash}$

October 22, 1991
Gene Doss

AUG 1 - 1991



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 16, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RECEIVED
8/11/91
M. KIDDER
P. BARNES
A. KOESTER

Mr. L. A. Stanley
General Manager
Seminole Kraft Corporation
9469 Eastport Road
P. O. Box 26998
Jacksonville, Florida 32218-0998

AUG 5 1991

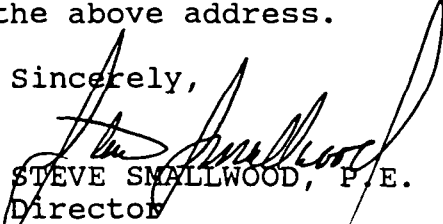
OERTEL, HOFFMAN,
FERNANDEZ & COLE, P.A.

Dear Mr. Stanley:

Re: Request to Burn Recycle Fiber as a Fuel
Nos. 1 and 2 Bark Boilers

The Department has reviewed your letter with attachments received June 28, 1991, regarding the request to burn recycle fiber as a fuel in the above referenced combination (carbonaceous and fossil fuels) boilers. Based on a review of the letter and attachments, a construction permit for a modification will be required in order for the boilers to be allowed to burn recycle fiber as a fuel, because the boilers are not currently permitted to burn plastics and metals (other than the normal constituents of the fossil fuels permitted as fuels), which are components of the recycle fiber. Therefore, please submit the proper application form(s), including all assumptions, calculations and reference material, and the appropriate processing fee to the Department of Environmental Regulation; and, the evaluation of all pollutants should compare the current actual emissions versus the future potential/allowable emissions. Also, provide an ultimate analysis of the current fuel(s) and the proposed fuels on a bone dry, percent weight basis; and, provide the fuel utilization rates on a tons per hour and tons per day basis. Please explain where the plastics will come from and how it is part of the recycle fiber waste stream.

If there are any questions, please call Mr. Clair Fancy at (904) 488-1344 or write to me at the above address.

Sincerely,

STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

SS/BM/t

cc: A. Kutyna, NE District G. Smallridge, Esq., DER
R. Roberson, BESD

file 1003
Seminole K
Bark Boilers

Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

June 25, 1991

Mr. Steve Smallwood, Director
Division of Air Resources Management
Florida Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

JUN 28 1991

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

Re: Notice in the change of Mix of Carbonaceous
Fuels for Seminole Kraft Bark Boilers

Dear Mr. Smallwood:

This letter is to notify the Department of an anticipated change in the mix of carbonaceous fuels for the Seminole Kraft Corporation No.1 and No.2 bark boilers for the period of time between conversion to recycled fiber operation (Summer/Fall 1992) and AES compliance testing (Spring, 1994). These boilers are authorized to burn carbonaceous fuel and oil. Carbonaceous fuel will remain the primary fuel with oil used during startup, shutdown upsets or malfunctions.

As you know, Seminole Kraft has been authorized to replace its existing kraft mill with a recycled fiber operation. Seminole Kraft is required to have that project completed and the recovery boilers shut down by November 12, 1992 under the state permit. In addition, in a settlement with the City of Jacksonville, Seminole Kraft has agreed to expedite that process.

Seminole Kraft hopes to start the new recycled fiber operation in the summer of 1992. At that time the bark boilers will continue to burn bark but, in addition, will need to burn a small amount, less than 25%, of recycled fiber rejects. These recycled fiber rejects consist of 75% wood fiber, 15% inorganic material (sand, grit, glass and metal), and 10% plastic. Hence, on a BTU basis, wood fiber will still account for over 90% of the carbonaceous fuel. There will be no increase in the allowable emissions or heat input. Please see Attachment A for more details.

The boilers will require no physical changes to accommodate the fuel and would have been capable of burning that mix of fuel prior to January 6, 1975, or prior to 1971. There is no change in the method of operation since the boilers were capable of accommodating an alternative fuel under the facility's

Mr. Steve Smallwood
Carbonaceous Fuels
June 25, 1991
Page Two

construction specifications. See 40 CFR 60.14(e)(4). Similarly, under F.A.C. Rule 17-2.500(2)(c)4, there is an exemption from the definition of "modification" for the use of an alternative fuel which the facility was capable of accommodating before January 6, 1975, unless such change is prohibited under any federally enforceable permit condition established after January 6, 1979. This also would be outside the definition of "major modification" as an alternative fuel since the source was capable of accommodating the fuel prior to January 6, 1975. See 40 CFR 52.21(2)(d) and F.A.C. Rule 17-2.500(2)(c)4. Accordingly, we believe no permit is required to accommodate such a minor change in the mix of carbonaceous fuels. We would request that this letter be attached to the operating permit file.

We would like to continue to operate the two bark boilers in this fashion subject to renewal of its operating permit up until they are required to be shut down under terms of the AES Cedar Bay Certification Order. In the meantime, and most likely within the next three months, Seminole Kraft will apply for a construction permit to address operating requirements after the date on which the existing bark boilers are required to be shut down and their current operating permits surrendered. This will allow sufficient time to address all necessary information requirements of the Department in order to ensure their continued operation in accordance with applicable requirements of the Department and the City, as well as EPA. I have attached copies of significant correspondence regarding this matter, the operating permits for these sources and the relevant portion of the AES Cedar Bay conditions and certification.

In summary, we believe no special permitting is required to enable Seminole Kraft to continue to burn carbonaceous fuels in the bark boilers. We do intend to submit a full construction permit application for operation after AES Cedar Bay startup and testing and will submit such an application to you within the next two months.

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

Sincerely,



L.A. Stanley
General Manager

ah
attachments

CC: Curt Barton
Terry Cole

Ernest Frey
James Manning

Clair Fancy
Mike Riddle

ATTACHMENT A

Seminole Kraft Corporation
Bark Boilers

I. Current Permit

A. Fuel

1. Carbonaceous Fuel (Bark)
2. No. 6 Fuel Oil (2.27% Sulfur)

B. Boiler Capacity

Max. Rate - 193 mmBtu/hr heat input

C. Normal Operation - 100% Carbonaceous Fuel

D. Abnormal Operation - No. 6 Oil & Carbonaceous Fuel
(Startup, Shutdown, Malfunction, etc.)

E. Allowable Emissions

PM (Carbonaceous Fuel) 0.2 lb/mmBtu or 38.6 lb/hr
PM (Oil Fired) 0.1 lb/mmBtu or 19.3 lb/hr
PM (Combinations of Carbonaceous and Oil - Limited to 193 mmBtu/hr. Allowable PM emissions for any combination shall be calculated on the sum of the individual calculations for carbonaceous and oil fuels.

II. Projected Fuel After Startup of Recycle Operation

A. Fuel

1. Carbonaceous Fuel (Bark & Wastepaper Rejects*)
2. No. 6 Fuel Oil (1.0% Sulfur)

B. Boiler Capacity

Max. Rate - 193 mmBtu/hr per boiler

C. Normal Operation - 100% Carbonaceous Fuel

D. Abnormal Operation - No. 6 Oil & Carbonaceous Fuel

* Wastepaper rejects consist of approximately 75% wood fiber, 15% inorganic material (sand, grit, glass and metal fragments) and 10% plastic.

E. Carbonaceous Fuel Data

1. Heat Value
Bark (Dry) - 6500 Btu/#
Wastepaper Rejects (Dry) - 8000 Btu/#
2. Fuel Quantity
Bark (Dry) - 11.15 Tons/hr
Wastepaper Rejects (Dry) - 3 Tons/hr
3. Firing Rate
Bark Heat Input = 6500 (11.15) 2000 = 145 mmBtu/hr
Wastepaper Rejects = 8000 (3) 2000 = 48 mmBtu/hr
Total Heat Input = 193 mmBtu/hr

F. Allowable Emissions

PM (Carbonaceous Fuel) = 0.2 lb/mmBtu or 38.6 lb/hr
PM (Oil Fired) = 0.1 lb/mmBtu or 19.3 lb/hr
PM (Combinations of Carbonaceous Fuel and Oil limited to 193 mmBtu/hr. Allowable PM emissions for any combination shall be calculated based on the sum of the individual calculations for Carbonaceous and Oil Fuels.



ATTACHMENT B

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 (AESCB) 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.

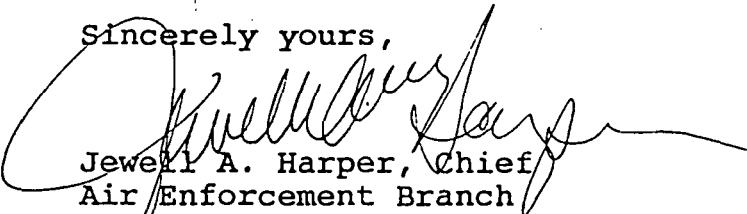
If the bark boilers were not capable of firing the alternative fuel prior to August 17, 1971, then they could be subject to either Subparts D or E or both if an increase in the emission rate of a regulated pollutant occurs. In addition, in order for Subpart E to apply, the combination of bark and fiber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

ATTACHMENT C

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

ATTORNEYS AT LAW

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R. L. CALEEN, JR.
C. ANTHONY CLEVELAND
TERRY COLE
ROBERT C. DOWNIE, II
MARTHA J. EDENFIELD
SEGUNDO J. FERNANDEZ
KENNETH F. HOFFMAN
KENNETH G. OERTEL
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TELEPHONE (904) 877-0099
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JOHN H. MILLICAN
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)
J. R. SUBRAMANI, PH. D., P. E.
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

October 26, 1990

Mr. Steve Smallwood
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Refurbishment or replacement of
Seminole Kraft Bark Boilers; Changing Fuel Mix

Dear Steve:

The purpose of this letter is to confirm your previous discussion with Julie Blunden, Curt Barton, and me concerning refurbishment or replacement of existing bark boilers, or the use of such boilers to burn recycled fiber rejects as well as bark.

As you know, Seminole Kraft Corporation proposes to convert its Jacksonville mill to a 100% recycle operation. This will benefit the community in many ways, including reducing the need to landfill used corrugated containers and eliminating all TRS emissions.

In processing the recycled fiber a certain amount of rejects will be produced which must be burned or landfilled. Due to the volume of rejects generated over the long term, incineration is preferred. The fiber rejects have a high energy content and they can be efficiently burned with bark (also generated on-site) in boilers adequate for this purpose.

The DER permitting requirements for boilers used for this purpose would depend on whether the AES Cedar Bay/Seminole Kraft Co-generation Project is ultimately certified.

Permitting Requirements if AES Cedar Bay/Seminole Kraft Project is Certified:

If the Co-generation Project is certified, Condition IID of the proposed Conditions of Certification (revised 7-19-90) requires

Mr. Steve Smallwood
October 26, 1990
Page 2

that Power Boiler Nos. 1 through 3 and Bark Boiler Nos. 1 and 2 are to be "permanently shut down and made incapable of operation" at the time initial compliance tests on the AESCB boilers are completed. This provision constitutes a federally enforceable permit condition upon final action by the Siting Board and Secretary.

In light of this condition, the same permitting requirements apply irrespective of whether a new boiler is constructed to burn bark and fiber rejects or an existing boiler is refurbished for this purpose. These requirements would consist of the applicable federal and state New Source Performance Standard; assurance that ambient air quality standards will not be violated; and Prevention of Significant Deterioration (PSD) review in the absence of creditable emission reductions such as those resulting from the shut-down of the Kraft Recovery Boilers. See Rule 17-2.500, F.A.C. There is no prohibition against applying for a new source permit because of a federally enforceable condition requiring retirement of an existing source.

Permitting Requirements for Bark Boilers if AES Cedar Bay/Seminole Kraft Project Not Certified:

The permitting requirements are different, however, if the proposed Co-generation Project is not certified. The existing Bark Boiler(s) are capable of being used to burn the fiber rejects as well as bark.

It appears that the change in fuel content -- from 100% bark to a 75% bark/25% fiber reject mix -- does not constitute a modification for purposes of applying new source performance standards or PSD review. This is because of the way "modification" is defined and the specific exemption to that definition.

Modification is defined in 40 CFR §60.2 (also found in Chapter 17-2, F.A.C.) as:

Any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

Mr. Steve Smallwood
October 26, 1990
Page 3

There is, however, an exception to the definition which applies to use of an alternative fuel or raw material if prior to the applicable date of the regulation the existing facility was capable of accommodating an alternative fuel use. A "facility" is capable of accommodating an alternative fuel use if the use could be accomplished under the facility's construction specifications as amended prior to the change. 40 CFR §60.14(e)(4).

DER rules contain a similar exemption. Rule 17-2.500(2)(c)4, F.A.C., exempts the use of an alternative fuel which the facility was capable of accommodating before January 6, 1975, unless such change is prohibited under any federally enforceable permit condition established after January 6, 1975.

Since prior to January 6, 1975, the bark boilers were capable of burning the reject fibers in the percentages anticipated, and still are, they fall within the exception to the general NSPS requirement.

EPA and DER rules also subject "major modifications" of existing facilities to PSD review. Such modifications are generally defined as any physical change in, or change in the method of operation of, a major stationary source which would result in a significant net emissions increase of any pollutants subject to regulation. The rules also contain, however, an exemption for a physical change or change in method of operation for the use of an alternative fuel or raw material which the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition established after January 6, 1975. 40 CFR 52.21(2)(d); see also §17-2.500(2)(c)4., F.A.C.

Consequently, under the situation described, the switch in fuel mixture would not be a major modification requiring PDS review. Seminole Kraft would, however, notify the Department before burning the reject fibers and answer any questions concerning it.

Mr. Steve Smallwood
October 26, 1990
Page 4

I would appreciate your confirming my understanding of our discussion. Please do not hesitate to provide corrections or clarification where needed. Thank you for your cooperation.

Sincerely,


Terry Cole

TC/kp

cc: Curt Barton
Julie Blunden

s-smallw.ltr

ENVIRONMENTAL CONSULTING SERVICES, CO.

P.O. Box 733

Orange Park, FL 32067-0733

(904) 282-7788

ROBERT G. HAINES, Ph.D.

President

November 19, 1991

RECEIVED

NOV 22 1991

Division of Air
Resources Management

Mr. H.S. Owen
Power Plant Siting Coordinator
FDER
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Dear Buck:

Enclosed is our general counsel's letter to the folks next door relative to the Seminole Kraft's statements regarding their boilers.

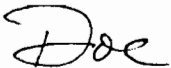
We have many problems with this situation, if true. Are the boilers really going to be used after the plant is operable?

As you may recall, when I first became involved in this case, I mentioned vinyl chloride. After several inquiries, it appears that this potential dangerous pollutant can originate from the SKC boilers. Wood chips that contain portions of polyethylene are burned in these types of boilers. Since SKC is a co-applicant, we need to evaluate this apparent "modification" of the certification. In Ms. Julie Blunden's letter to DARM (Jan. 2, 1990) AES Cedar Bay "provides SKC with an opportunity to retire the paper mill's outdated power boilers." Is SKC not exercising this option?

Another troubling factor is the alleged reduction of NO_x and SO₂ emissions. Your comments in July and again in our meeting on September 13 indicate clearly AES does not intend to use maximum acceptable control technology, a term employed in the Clean Air Act of 1990. Since their projected completion date is but one year from the required compliance with emission standards for 189 pollutants, it is inconceivable for us to believe their equipment as now designed will meet all these standards yet to be developed. AES has represented in a public meeting that their equipment will meet any standard as built. More disturbing is the letter from EPA's Winston Smith (March 27, 1991) regarding the SO₂ offset theory as not being accurate and the BACT question. Herein lies substantive conflict in opinion on emissions and BACT control.

Your comments on these items are important. Please respond.

Sincerely,



R. G. Haines, Ph.D.
President

ejh
Enclosures



JOHN A. DELANEY
GENERAL COUNSEL

OFFICE OF
GENERAL COUNSEL
CITY OF JACKSONVILLE
SUITE 715 TOWNCENTRE
421 WEST CHURCH STREET
JACKSONVILLE, FLORIDA 32202-4156

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FAX (904) 630-4991

November 14, 1991

Terry Cole, Esq.
Oertel, Hoffman, Fernandez & Cole, P.A.
2700 Blair Stone Road, Suite C
P. O. Box 6507
Tallahassee, Florida 32314-6507

RE: Seminole Kraft Corp., Jacksonville Plant, continued boiler use

Terry
Dear Mr. Cole:

Yesterday, Mr. Larry Stanley, the manager of the Seminole Kraft plant in Jacksonville, addressed a group of concerned citizens. He explained Seminole's recent application to change Seminole Kraft's land use classification from light industrial to heavy industrial. At the meeting, he also mentioned that Seminole Kraft would not be receiving all of its steam power from AES Cedar Bay's cogeneration plant, and would continue to operate some of its present boilers. Would you please confirm and explain Seminole Kraft's intentions regarding the existing boilers and the power sharing arrangement with AES.

AES/Cedar Bay and Seminole Kraft, co-applicants for a co-generation plant under Florida's Electric Power Plant Siting Act, have represented that one of the major benefits of the project was elimination of Seminole's inefficient boilers. As Hearing Officer Benton found in his May, 1990, Recommended Order


Construction of the new cogeneration facility will allow the existing bark boilers and oil-fired boilers at the mill to shut down. (cit. omit.) Seminole Kraft is under orders to close down the most egregious of its several air pollution sources, in any event.

Under the Consent Judgment approved by Circuit Judge Darden last December, Seminole Kraft agreed to shut down the old pulp mill by September, 1992, including discontinuing use of the recovery boilers.

Terry Cole, Esq.
November 14, 1991
Page -2-

Mr. Stanley's comments suggest that Seminole Kraft has other plans. If that is true, the City would like those plans explained. If Mr. Stanley is misinformed, your explanation of the true circumstances will help allay our understandable concerns.

Sincerely,


Gregory K. Radlinski
Assistant Counsel
Environmental Law Division

cc:
Councilman Reagan
Councilman Carlucci
Councilman Crescimbeni
General Counsel Delaney
J. Heard, Esq.
R. Pennington, Esq.
Mr. S. Campbell
Mrs. B. Broward
R. G. Haines, Ph.D.
R&ESD

GKR/lou

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. ~~CLAIR FAMILY~~
2. Bruce 11/22
3. please get with
4. Barry's Buck on
his.

Remarks: Clair

From
BUCK

Date 11/22
Phone



Stone Container Corporation

Technology and Engineering

Containerboard and Paper Division

2150 Parklake Drive
Suite 400
Atlanta, Georgia 30345

RECEIVED

404 621-6700

November 14, 1991

NOV 18 1991

Division of Air
Resources Management

Mr. Clair Fancy, Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

On November 6, 1991, you received a letter from Mike Riddle, Technical Director at the Seminole Kraft Paper Mill in Jacksonville, FL which addressed your concerns over the burning of recycled fiber rejects in the bark boilers.

Since sending the letter, we have discovered that the percent plastic value might be misleading. We stated that the plastic was 0.3% which was based on the total recycled fiber bale weight of 750 lbs. The actual reject portion of recycled fiber is approximately 15% or 112 lbs. out of a 750 lb. bale. Therefore, the actual, burnable recycled fiber reject feed contains 96.37% fiber, 1.4% inorganic (sand, glass, etc.) and 2.23% plastic which contains only 190 ppm of chlorine.

We apologize for any confusion that our original calculation may have caused and trust that this letter rectifies any deficiency.

Sincerely,

Craig Hurd
Regional Environmental Manager

bbm

- cc: Curt Barton
- Terry Cole
- Mike Riddle
- Larry Stanley
- B. Mitchell
- A. Nutterson, NEQIA
- R. Robinson, OESD

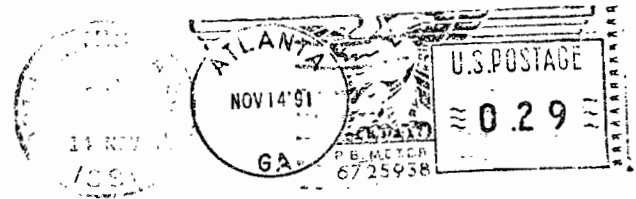


Stone Container Corporation

Containerboard and Paper Division

2150 Parklake Drive
Suite 400
Atlanta, Georgia 30345

Mr. Clair Fancy, Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400





Seminole Kraft Corporation

PM
11-7-91
Jacksonville

File Copy
Recycle Fiber

Jacksonville Mill

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

November 6, 1991

904 751-6400

RECEIVED

NOV 12 1991

Mr. Clair Fancy, Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Bureau of
Air Regulation

Dear Mr. Fancy:

In September you met with Stone Container representatives, Mr. Curt Barton and Mr. Terry Cole, concerning Seminole Kraft Corporation's request to burn recycled fiber rejects in the bark boilers. This request was for the period of time between the mill conversion to recycled fiber operation in the Summer/Fall 1992 and AES Compliance testing (Spring 1994). In a July 23, 1991 letter to Mr. Steve Smallwood, it was stated that the rejects would be less than 25% of the fuel and would not result in the increase of allowable emissions or heat input.

At the meeting you expressed three concerns: 1) Of the estimated 10% plastic content, how much is chlorinated plastic, 2) is there a danger of increased metals emissions from the estimated 15% inorganic portion, and 3) will there be a significant increase in VOC emissions. During the past month, we have initiated several projects to help address these concerns.

Quantity of Chlorinated Plastic

Stone Container's Missoula, Montana mill has a new recycled fiber plant which is similar in operation, reject removal and burning, and raw material feed to the one being constructed at Seminole Kraft. A typical 750 pound bale of recycled fiber was broken open and hand sorted for plastic material. While most of the plastic could not be identified as to original use, nearly all of it fell into one of two categories; strapping or bags. Further, the total 2 1/2 pounds of retrieved plastic (0.3% of the bale weight) was nearly equally divided between the two fractions. These two samples were sent to Galbraith Laboratories for chlorine analyses and the results are included in Appendix I.

The average chlorine content, 190 ppm, is low and is comparable with the chlorine content of bark, 153 ppm, (Appendix II). Total chlorine contribution from the plastic is 190 ppm CH x 0.3% plastic = 0.0001%.

Mr. Clair Fancy, Chief
November 4, 1991
Page 2

Inorganic Fraction of Recycle Rejects

Again, our Missoula, Montana operation was used to provide the necessary data. Samples of actual recycle fiber reject material was taken from the collection bin just prior to burning. The samples were ashed and the results (Appendix III) revealed that the inorganic portion was 1.43% which is much lower than the original estimate of 15% and, in fact, is lower than the inorganic fraction found in bark, 3.4%, (Appendix II). As a second check, a sample of recycle fiber rejects from Stone Container's Florence, South Carolina mill was also ashed. The inorganic portion was found to be 1.23% (Appendix IV) which agrees with the Missoula results. This low ash content is similar to carbonaceous fuels presently being burned in the bark boilers, and indicates there should be no increase in metal emissions resulting from burning recycle fiber rejects.

VOC Emissions

As you suggested at the September meeting, the best way of ascertaining that there will be no significant increase in VOC emission is to conduct a VOC stack test before and after the introduction of recycle fiber rejects to the bark boilers. Seminole Kraft agrees to conduct these tests.

Summary

In summary, our projects portray a burnable recycle fiber reject feed containing 98.3% fiber, 1.4% inorganic (sand, glass, etc.) and 0.3% plastic which contained only 190 ppm chlorine. We trust these data adequately answer your concerns and that we have demonstrated that this interim burning of recycle fiber rejects will have no environmental impact.

Sincerely,



Michael E. Riddle, Technical Director
Craig Hurd, Regional Environmental Manager

/pt

cc: L.A. Stanley
Terry Cole
Curt Barton

CHF/BA/PL
Bruce Mitchell
Andy Kutyna, NED
Ron Roberson, BESD

} 11-12-91 Am



Stone Container Corporation

Missoula Mill

Mullan Road
P.O. Box 4707

Missoula, Montana 59806-4707

Containerboard and Paper Division

APPENDIX I

406 626-4451

Oct 2, 1991

Dear Mike:

Here it is. The plastic that was contained in a bale that weighed approximately 750 lb. Let me know what you find regarding percent PVC after your investigation is over.

Best Regards,
Jenny Brown

Separated	in two piles by Seminole.	
<u>straps/tape</u>	<u>bags</u>	
412.2 grams	737.7 grams	total 1149.9 grams
		or 2.5 pounds

cc. Craig Ford.

GALBRAITH

Laboratories, Inc.

QUANTITATIVE MICROANALYSES

ORGANIC — INORGANIC

PHONE 615/546-1335 FAX 615/546-7209

HARRY W. GALBRAITH, Ph.D
CHAIRMAN OF THE BOARD
KENNETH S. WOODS
PRESIDENT
VELMA M. RUSSELL
SECRETARY-TREASURER
DAVID J. STROM
SENIOR VICE-PRESIDENT
GAIL R. HUTCHENS
EXECUTIVE VICE-PRESIDENT
WILLIAM M. LONGMIRE
VICE-PRESIDENT
TECHNICAL SERVICES

Mr. Gene Doss
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

October 21, 1991

Received: Oct. 16th
PO#: 11423

Dear Mr. Doss:

Analysis of your compound gave the following results:

Your #,	Our #,	ppm Chlorine,
A <i>strap/tape</i>	T-3677	270
B <i>bags</i>	T-3678	109

Sincerely yours,

GALBRAITH LABORATORIES, INC.

Gail R. Hutchens
Gail R. Hutchens
Exec. Vice-President

GRH:sla

APPENDIX II

Average of 7 attached bark tests.

Ash = 3.4%

Chlorine = 153 ppm



TECHNICAL SERVICES, INC.

ENVIRONMENTAL CONSULTANTS — INDUSTRIAL CHEMISTS
OFFICE 2471 SWAN ST. — P.O. BOX 52329
LABORATORIES 103-107 STOCKTON STREET
JACKSONVILLE, FLORIDA 32201
(904) 353-5761



Laboratory No. 82968

February 24, 19 88

Sample of Bark

Date Received 02/16/88

For Seminole Kraft Corporation, P.O. Box 26998, Jacksonville, Florida 32218
Attention: Mr. Hodges

Marks: 02/16/88

CERTIFICATE OF ANALYSIS OR TESTS

		<u>Method</u>	<u>Date/Time</u>	<u>Analyst</u>
BTU/lb (Dry Basis)	6,971	ASTM D2015	02/17/88-1525	RK
Carbon (Dry Basis)	50.11 %			
Hydrogen (Dry Basis)	6.08 %			
Nitrogen (Dry Basis)	0.26 %			
Sulfur (Dry Basis)	0.012 %	ASTM D3177	02/18/88-0911	RK
Chloride (Dry Basis)	0.061 %	ASTM D808	02/18/88-1341	RK
Oxygen	41.67 %	By Difference		
Ash (Dry Basis)	1.804 %	ASTM D3174	02/17/88-1427	RK
Moisture (as received)	34.89 %	ASTM D3172	02/17/88-0912	RK

368 ppm as Chlorine
calculated by M. Riddle 10/31/91
Assume Chloride = NaCl
Chlorine = 60.3% of chloride

Respectfully submitted,

TECHNICAL SERVICES, INC.

BY Henry C. Gray, Jr.

GALBRAITH

Laboratories, Inc.

QUANTITATIVE MICROANALYSES

ORGANIC — INORGANIC

PHONE 615/546-1335 FAX 615/546-7209

HARRY W. GALBRAITH, Ph.D.
CHAIRMAN OF THE BOARD
KENNETH S. WOODS
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EXECUTIVE VICE-PRESIDENT
WILLIAM M. LONGMIRE
VICE-PRESIDENT
TECHNICAL SERVICES

Mr. G. Doss
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

September 10, 1991

Received: August 28th
PO#: 10441

Dear Mr. Doss:

(Bark)

Analysis of your compound gave the following results:

Your #,	Our #,	Analyses,	
1	S-6602	As Received,	
		% Moisture	41.76
		% Ash	2.15
		Dry Basis,	
		% Carbon	51.13
		% Hydrogen	5.73
		% Kjeldahl Nitrogen	0.15
		ppm Sulfur	228
		ppm Chlorine	91
		% Ash	3.70
		% Oxygen (By Diff)	39.41
2	S-6603	As Received,	
		% Moisture	44.91
		% Ash	3.48
		Dry Basis,	
		% Carbon	46.61
		% Hydrogen	5.78
		% Kjeldahl Nitrogen	0.12
		ppm Sulfur	1247
		ppm Chlorine	336
		% Ash	6.31
		% Oxygen (By Diff)	41.14

Mr. Doss
Page 2
September 10, 1991

Your #,	Our #,	Analyses,	
3	S-6604	As Received,	
		% Moisture	40.99
		% Ash	1.28
		Dry Basis,	
		% Carbon	52.79
		% Hydrogen	5.72
		% Kjeldahl Nitrogen	0.19
		ppm Sulfur	272
		ppm Chlorine	97
		% Ash	2.17
		% Oxygen (By Diff)	39.28
4	S-6605	As Received,	
		% Moisture	40.16
		% Ash	1.96
		Dry Basis,	
		% Carbon	51.96
		% Hydrogen	5.65
		% Kjeldahl Nitrogen	0.15
		ppm Sulfur	245
		ppm Chlorine	80
		% Ash	3.27
		% Oxygen (By Diff)	39.09
5	S-6606	As Received,	
		% Moisture	63.15
		% Ash	1.69
		Dry Basis,	
		% Carbon	51.05
		% Hydrogen	5.50
		% Kjeldahl Nitrogen	0.27
		ppm Sulfur	663
		ppm Chlorine	79
		% Ash	4.58
		% Oxygen (By Diff)	38.80

Mr. Doss
Page 3
September 10, 1991

Your #,	Our #,	Analyses,	
6	S-6607	As Received,	
		% Moisture	57.49
		% Ash	0.87
		Dry Basis,	
		% Carbon	51.84
		% Hydrogen	5.59
		% Kjeldahl Nitrogen	0.34
		ppm Sulfur	348
		ppm Chlorine	19
		% Ash	2.04
		% Oxygen (By Diff)	40.49

Sincerely yours,

GALBRAITH LABORATORIES, INC.



Gail R. Hutchens
Exec. Vice-President

GRH:dse



Stone Container Corporation

Missoula Mill

APPENDIX III

Mullan Road
P.O. Box 4707
Missoula, Montana 59806-4707

Containerboard and Paper Division

October 30, 1991

Craig Hurd
Regional Manager
Environmental Services
Stone Container Corporation
Technology and Environmental Center
2150 Parklake Drive, Suite 400
Atlanta, GA 30345

406 626-4451

Dear Craig,

As you requested, I had a sample of our burnable wastes tested for ash content. The averaged ash content was 1.43%.

A representative sample of our burnable OCC rejects was collected from the central collection bin. These rejects are a combination of rejects from: 1) the hydrapurge/selectpurge system, 2) the Wandel vibration screens (rejects from the coarse screens) and 3) the hydradenser (rejects from the tertiary slotted screen and waxes and stickies from the Krofta clarifier). I have included a print out of the basic scheme of the Missoula OCC plant from the Honeywell computer controls for reference.

This sample was divided into three parts and dried for 24 hours and weighed on a bone dry basis. The samples were then brought gradually up to approximately 575 degrees Centigrade in our muffle furnace and burned at that temperature for approximately three hours. The samples were then cooled for about one hour in a desiccator and weighed. The weights, in grams, are recorded below along with the calculated inorganic fraction of the sample in percent.

	<u>Bone Dry</u>	<u>Ash</u>	<u>%Ash</u>
Sample 1	1.7913	0.0237	1.323
Sample 2	0.8943	0.0133	1.487
Sample 3	0.9651	0.0152	1.606
Average:	1.2169	0.0174	1.430 (using the average weights.)

If you have any questions, please let me know.

Sincerely,

Jenny Brown
Quality Control Engineer

APPENDIX IV

A representative sample off recycle fiber rejects from the Stone Container mill in Florence, South Carolina was dried and then ashed in a muffle furnace at 600°C.

Bone Dry Weight:

58.5604		53.6512
- <u>53.5902</u> (crucible)		- <u>53.5902</u>
4.9702 grams		0.0610
0.0610/4.9702	=	0.0123
	=	1.23% Ash

October 22, 1991
Gene Doss

11-12-91

~~Att~~
~~BT~~
~~BT~~

FYI, review
initial. Please return
to Patty for filing.
cc'd: Bruce
Andy Kutyna
Ron Robertson

Olson
B

meeting @ BAR 10:30-11:30 8-16-91
CIT #, Mr. Terry Cole & Curt Barton
(SKC)

Residence Time calc. -

HCL concerns -

chlorinated organics -

VOCs -

THCs -

if CI
containing
waste
plastic

Recycle Project - To shut down RB's due to
TAS rule

~~RES~~

Feb-Mar 92 - #1 line of BCRP (baled corrugated
recycle paper)

Jun 92 - #2 line of BCRP (baled corrugated
recycle paper)

early '94 - AES will come on-line

2 x 193 MMBtu/hr HI -

Bark will be used less due to ↑ in
BCRP.

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. L. A. Stanley, Gen. Mgr.
 Seminole Kraft Corp.
 9469 Eastport Road
 P.O. Box 26998
 Jacksonville, FL 32218-0998

4a. Article Number

P 832 538 664

4b. Service Type

- Registered Insured
 Certified COD
 Express Mail Return Receipt for

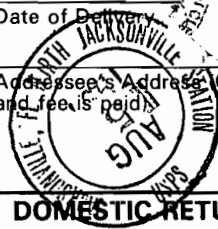
7. Date of Delivery

8. Addressee's Address Only if requested and fees paid

5. Signature (Addressee)

6. Signature (Agent)

Allen Corrado
 8-1-91



PS Form 3811, October 1990

U.S. GPO: 1990-273-881

DOMESTIC RETURN RECEIPT

P 832 538 664



Certified Mail Receipt

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to Mr. L. A. Stanley, Gen. Mgr.	
Seminole Kraft Corp.	
Street & No. 9469 Eastport Road	
P.O. Box 26998	
P.O., State & ZIP Code Jacksonville, FL 32218-0998	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date mailed: 7/29/91 Nos. 1 & 2 Bark Boilers: Recycle Fiber (Duval Co.)	

PS Form 3800, June 1990



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Lawton Chiles, Governor Carol M. Browner, Secretary

July 16, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

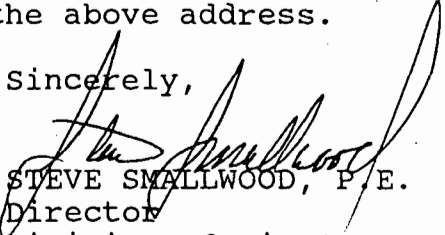
Mr. L. A. Stanley
General Manager
Seminole Kraft Corporation
9469 Eastport Road
P. O. Box 26998
Jacksonville, Florida 32218-0998

Dear Mr. Stanley:

Re: Request to Burn Recycle Fiber as a Fuel
Nos. 1 and 2 Bark Boilers

The Department has reviewed your letter with attachments received June 28, 1991, regarding the request to burn recycle fiber as a fuel in the above referenced combination (carbonaceous and fossil fuels) boilers. Based on a review of the letter and attachments, a construction permit for a modification will be required in order for the boilers to be allowed to burn recycle fiber as a fuel, because the boilers are not currently permitted to burn plastics and metals (other than the normal constituents of the fossil fuels permitted as fuels), which are components of the recycle fiber. Therefore, please submit the proper application form(s), including all assumptions, calculations and reference material, and the appropriate processing fee to the Department of Environmental Regulation; and, the evaluation of all pollutants should compare the current actual emissions versus the future potential/allowable emissions. Also, provide an ultimate analysis of the current fuel(s) and the proposed fuels on a bone dry, percent weight basis; and, provide the fuel utilization rates on a tons per hour and tons per day basis. Please explain where the plastics will come from and how it is part of the recycle fiber waste stream.

If there are any questions, please call Mr. Clair Fancy at (904) 488-1344 or write to me at the above address.

Sincerely,

STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

SS/BM/t

cc: A. Kutyna, NE District G. Smallridge, Esq., DER
R. Roberson, BESD

Reading File }
Bruce Mitchell } 7-29-91 RM



Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

June 25, 1991

Mr. Steve Smallwood, Director
Division of Air Resources Management
Florida Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

JUN 28 1991

Division of Air
Resources Management

Re: Notice in the change of Mix of Carbonaceous
Fuels for Seminole Kraft Bark Boilers

Dear Mr. Smallwood:

This letter is to notify the Department of an anticipated change in the mix of carbonaceous fuels for the Seminole Kraft Corporation No.1 and No.2 bark boilers for the period of time between conversion to recycled fiber operation (Summer/Fall 1992) and AES compliance testing (Spring, 1994). These boilers are authorized to burn carbonaceous fuel and oil. Carbonaceous fuel will remain the primary fuel with oil used during startup, shutdown upsets or malfunctions.

As you know, Seminole Kraft has been authorized to replace its existing kraft mill with a recycled fiber operation. Seminole Kraft is required to have that project completed and the recovery boilers shut down by November 12, 1992 under the state permit. In addition, in a settlement with the City of Jacksonville, Seminole Kraft has agreed to expedite that process.

Seminole Kraft hopes to start the new recycled fiber operation in the summer of 1992. At that time the bark boilers will continue to burn bark but, in addition, will need to burn a small amount, less than 25%, of recycled fiber rejects. These recycled fiber rejects consist of 75% wood fiber, 15% inorganic material (sand, grit, glass and metal), and 10% plastic. Hence, on a BTU basis, wood fiber will still account for over 90% of the carbonaceous fuel. There will be no increase in the allowable emissions or heat input. Please see Attachment A for more details.

The boilers will require no physical changes to accommodate the fuel and would have been capable of burning that mix of fuel prior to January 6, 1975, or prior to 1971. There is no change in the method of operation since the boilers were capable of accommodating an alternative fuel under the facility's

Mr. Steve Smallwood
Carbonaceous Fuels
June 25, 1991
Page Two

construction specifications. See 40 CFR 60.14(e)(4). Similarly, under F.A.C. Rule 17-2.500(2)(c)4, there is an exemption from the definition of "modification" for the use of an alternative fuel which the facility was capable of accommodating before January 6, 1975, unless such change is prohibited under any federally enforceable permit condition established after January 6, 1979. This also would be outside the definition of "major modification" as an alternative fuel since the source was capable of accommodating the fuel prior to January 6, 1975. See 40 CFR 52.21(2)(d) and F.A.C. Rule 17-2.500(2)(c)4. Accordingly, we believe no permit is required to accommodate such a minor change in the mix of carbonaceous fuels. We would request that this letter be attached to the operating permit file.

We would like to continue to operate the two bark boilers in this fashion subject to renewal of its operating permit up until they are required to be shut down under terms of the AES Cedar Bay Certification Order. In the meantime, and most likely within the next three months, Seminole Kraft will apply for a construction permit to address operating requirements after the date on which the existing bark boilers are required to be shut down and their current operating permits surrendered. This will allow sufficient time to address all necessary information requirements of the Department in order to ensure their continued operation in accordance with applicable requirements of the Department and the City, as well as EPA. I have attached copies of significant correspondence regarding this matter, the operating permits for these sources and the relevant portion of the AES Cedar Bay conditions and certification.

In summary, we believe no special permitting is required to enable Seminole Kraft to continue to burn carbonaceous fuels in the bark boilers. We do intend to submit a full construction permit application for operation after AES Cedar Bay startup and testing and will submit such an application to you within the next two months.

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

Sincerely,



L.A. Stanley
General Manager

ah
attachments

CC: Curt Barton
Terry Cole

Ernest Frey
James Manning

Clair Fancy
Mike Riddle

ATTACHMENT A

Seminole Kraft Corporation
Bark Boilers

I. Current Permit

A. Fuel

1. Carbonaceous Fuel (Bark)
2. No. 6 Fuel Oil (2.27% Sulfur)

B. Boiler Capacity

Max. Rate - 193 mmBtu/hr heat input

C. Normal Operation - 100% Carbonaceous Fuel

D. Abnormal Operation - No. 6 Oil & Carbonaceous Fuel
(Startup, Shutdown, Malfunction, etc.)

E. Allowable Emissions

PM (Carbonaceous Fuel) 0.2 lb/mmBtu or 38.6 lb/hr

PM (Oil Fired) 0.1 lb/mmBtu or 19.3 lb/hr

PM (Combinations of Carbonaceous and Oil - Limited to 193 mmBtu/hr. Allowable PM emissions for any combination shall be calculated on the sum of the individual calculations for carbonaceous and oil fuels.

II. Projected Fuel After Startup of Recycle Operation

A. Fuel

1. Carbonaceous Fuel (Bark & Wastepaper Rejects*)
2. No. 6 Fuel Oil (1.0% Sulfur)

B. Boiler Capacity

Max. Rate - 193 mmBtu/hr per boiler

C. Normal Operation - 100% Carbonaceous Fuel

D. Abnormal Operation - No. 6 Oil & Carbonaceous Fuel

* Wastepaper rejects consist of approximately 75% wood fiber, 15% inorganic material (sand, grit, glass and metal fragments) and 10% plastic.

E. Carbonaceous Fuel Data

1. Heat Value

Bark (Dry) - 6500 Btu/#

Wastepaper Rejects (Dry) - 8000 Btu/#

2. Fuel Quantity

Bark (Dry) - 11.15 Tons/hr

Wastepaper Rejects (Dry) - 3 Tons/hr

3. Firing Rate

Bark Heat Input = 6500 (11.15) 2000 = 145 mmBtu/hr

Wastepaper Rejects = 8000 (3) 2000 = 48 mmBtu/hr

Total Heat Input = 193 mmBtu/hr

F. Allowable Emissions

PM (Carbonaceous Fuel) = 0.2 lb/mmBtu or 38.6 lb/hr

PM (Oil Fired) = 0.1 lb/mmBtu or 19.3 lb/hr

PM (Combinations of Carbonaceous Fuel and Oil limited to 193 mmBtu/hr. Allowable PM emissions for any combination shall be calculated based on the sum of the individual calculations for Carbonaceous and Oil Fuels.



ATTACHMENT B

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 (AESCB) 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.

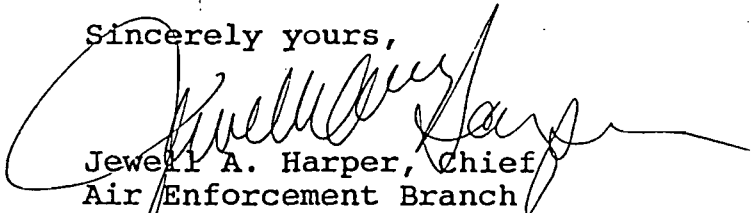
If the bark boilers were not capable of firing the alternative fuel prior to August 17, 1971, then they could be subject to either Subparts D or E or both if an increase in the emission rate of a regulated pollutant occurs. In addition, in order for Subpart E to apply, the combination of bark and fiber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

ATTACHMENT C

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
KENNETH G. OERTEL
HAROLD F. X. PURNELL
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 26, 1990

Mr. Steve Smallwood
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Refurbishment or replacement of
Seminole Kraft Bark Boilers; Changing Fuel Mix

Dear Steve:

The purpose of this letter is to confirm your previous discussion with Julie Blunden, Curt Barton, and me concerning refurbishment or replacement of existing bark boilers, or the use of such boilers to burn recycled fiber rejects as well as bark.

As you know, Seminole Kraft Corporation proposes to convert its Jacksonville mill to a 100% recycle operation. This will benefit the community in many ways, including reducing the need to landfill used corrugated containers and eliminating all TRS emissions.

In processing the recycled fiber a certain amount of rejects will be produced which must be burned or landfilled. Due to the volume of rejects generated over the long term, incineration is preferred. The fiber rejects have a high energy content and they can be efficiently burned with bark (also generated on-site) in boilers adequate for this purpose.

The DER permitting requirements for boilers used for this purpose would depend on whether the AES Cedar Bay/Seminole Kraft Co-generation Project is ultimately certified.

Permitting Requirements if AES Cedar Bay/Seminole Kraft Project is Certified:

If the Co-generation Project is certified, Condition IID of the proposed Conditions of Certification (revised 7-19-90) requires

Mr. Steve Smallwood
October 26, 1990
Page 2

that Power Boiler Nos. 1 through 3 and Bark Boiler Nos. 1 and 2 are to be "permanently shut down and made incapable of operation" at the time initial compliance tests on the AESCB boilers are completed. This provision constitutes a federally enforceable permit condition upon final action by the Siting Board and Secretary.

In light of this condition, the same permitting requirements apply irrespective of whether a new boiler is constructed to burn bark and fiber rejects or an existing boiler is refurbished for this purpose. These requirements would consist of the applicable federal and state New Source Performance Standard; assurance that ambient air quality standards will not be violated; and Prevention of Significant Deterioration (PSD) review in the absence of creditable emission reductions such as those resulting from the shut-down of the Kraft Recovery Boilers. See Rule 17-2.500, F.A.C. There is no prohibition against applying for a new source permit because of a federally enforceable condition requiring retirement of an existing source.

Permitting Requirements for Bark Boilers if AES Cedar Bay/Seminole Kraft Project Not Certified:

The permitting requirements are different, however, if the proposed Co-generation Project is not certified. The existing Bark Boiler(s) are capable of being used to burn the fiber rejects as well as bark.

It appears that the change in fuel content -- from 100% bark to a 75% bark/25% fiber reject mix -- does not constitute a modification for purposes of applying new source performance standards or PSD review. This is because of the way "modification" is defined and the specific exemption to that definition.

Modification is defined in 40 CFR §60.2 (also found in Chapter 17-2, F.A.C.) as:

Any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

Mr. Steve Smallwood
October 26, 1990
Page 3

There is, however, an exception to the definition which applies to use of an alternative fuel or raw material if prior to the applicable date of the regulation the existing facility was capable of accommodating an alternative fuel use. A "facility" is capable of accommodating an alternative fuel use if the use could be accomplished under the facility's construction specifications as amended prior to the change. 40 CFR §60.14(e)(4).

DER rules contain a similar exemption. Rule 17-2.500(2)(c)4, F.A.C., exempts the use of an alternative fuel which the facility was capable of accommodating before January 6, 1975, unless such change is prohibited under any federally enforceable permit condition established after January 6, 1975.

Since prior to January 6, 1975, the bark boilers were capable of burning the reject fibers in the percentages anticipated, and still are, they fall within the exception to the general NSPS requirement.

EPA and DER rules also subject "major modifications" of existing facilities to PSD review. Such modifications are generally defined as any physical change in, or change in the method of operation of, a major stationary source which would result in a significant net emissions increase of any pollutants subject to regulation. The rules also contain, however, an exemption for a physical change or change in method of operation for the use of an alternative fuel or raw material which the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition established after January 6, 1975. 40 CFR 52.21(2)(d); see also §17-2.500(2)(c)4., F.A.C.

Consequently, under the situation described, the switch in fuel mixture would not be a major modification requiring PDS review. Seminole Kraft would, however, notify the Department before burning the reject fibers and answer any questions concerning it.

Mr. Steve Smallwood
October 26, 1990
Page 4

I would appreciate your confirming my understanding of our discussion. Please do not hesitate to provide corrections or clarification where needed. Thank you for your cooperation.

Sincerely,


Terry Cole

TC/kp

cc: Curt Barton
Julie Blunden

s-smallw.ltr

7-15-91

OL

Chair,
Action Item # DARM
-278 due 7/16/91,
for SS's signature.
Hawkes,
Bruce

Department of Environmental Regulation
and Transmittal Slip

1.	Chair AI: DARM 278
2.	Due: 7-16
3.	Bruce 7/10
4.	pls draft brief response
Remarks:	
<p><i>Ca</i> draft response for SS's sig.</p> <p>if you determine this does not need a response, let me know.</p> <p>Thanks!</p>	
From:	Date
<i>Judy</i>	7-9-91
	Phone



Seminole Kraft Corporation

Jacksonville Mill

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

RECEIVED

June 25, 1991

904 751-6400

JUN 27 1991

Division of Air
Resources Management

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

Subject: Progress report on OCC conversion as required for
Construction Permits AC16-168607 and AC16-144791

Dear Mr. Fancy:

This letter is to comply with Specific Condition 15(c) of Construction Permit AC16-168607 and Specific Condition 11 of Construction Permit AC16-144791. This semi-annual update details progress made on the project as of June 1991.

Work on recycle line 1 progresses satisfactorily with work approximately 80% complete on internal tankage and 50% on foundations. Electrical and process equipment has begun arriving on-site and is being readied for installation.

Work on the outside storage pad has started. A small delay in issuance of city building permit was experienced but should not delay the project as a whole. We still anticipate a start-up in the summer of 1992.

If you have any questions, please contact me.

Sincerely,

Michael L. Riddle
Manager, Technical Services

/pt

cc: James Manning
Ernest Frey
L.A. Stanley
Curt Barton



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32229

I.D. Number:

31-16-0067-04

Permit/Certification Number:

AO16-149235

Date of Issue:

November 9, 1988

Expiration Date:

May 31, 1993

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-7441.800 N-3365.575

Project:

No. 1 Bark Boiler

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

For the operation of No. 1 Bark Boiler, Combustion Engineering Serial No. 16703 for the the production of 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.

Particulate Matter (PM) emissions shall be controlled as follows:

Source

No. 1 Bark Boiler

Control Equipment

Two sets of 4 each Buell VT Cyclone Separators in series with a Ducon Venturi Scrubber Type VVO

Emission source(s) shall be as follows:

Point

04

Source

No. 1 Bark Boiler

Located at 9469 Eastport Road, Jacksonville, Florida 32229

Supporting documents shall be as follows:

- (1) Permit AO16-71204
- (2) Operating Permit Application dated May 3, 1988
- (3) DER letter approving transfer of permits dated January 12, 1987
- (4) Stack tests (2) performed on October 28, 1987 and November 4, 1987.
- (5) Operation and Maintenance Plan

Permittee:
Seminole Kraft Corporation

I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

31-16-0067-04
AO16-149235
November 9, 1988
May 31, 1993

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)5., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.
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, BESD, 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.
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), FAC, and Rule 2.207, JEPB.
7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
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% Sulfur)	on Request	*
	Visible Emissions (VE)	On request	EPA RM No. 9

*Sulfur 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 BESD, and shall be reported as the sulfur content by percent (%) weight.

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</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	

Seminole Kraft Corporation
Bark Boilers

I. Current Permit

A. Fuel

1. Carbonaceous Fuel (Bark)
2. No. 6 Fuel Oil (2.27% Sulfur)

B. Boiler Capacity

Max. Rate - 193 mmBtu/hr heat input

C. Normal Operation - 100% Carbonaceous Fuel

D. Abnormal Operation - No. 6 Oil & Carbonaceous Fuel
(Startup, Shutdown, Malfunction, etc.)

E. Allowable Emissions

- PM (Carbonaceous Fuel) 0.2 lb/mmBtu or 38.6 lb/hr
- PM (Oil Fired) 0.1 lb/mmBtu or 19.3 lb/hr
- PM (Combinations of Carbonaceous and Oil - Limited to 193 mmBtu/hr. Allowable PM emissions for any combination shall be calculated on the sum of the individual calculations for carbonaceous and oil fuels.

II. Projected Fuel After Startup of Recycle Operation

A. Fuel

1. Carbonaceous Fuel (Bark & Wastepaper Rejects)
2. No. 6 Fuel Oil (1.0% Sulfur)

B. Boiler Capacity

Max. Rate - 193 mmBtu/hr per boiler

C. Normal Operation - 100% Carbonaceous Fuel

D. Abnormal Operation - No. 6 Oil & Carbonaceous Fuel

E. Carbonaceous Fuel Data

1. Heat Value

Bark (Dry) - 6500 Btu/#

Wastepaper Rejects (Dry) - 8000 Btu/#

2. Fuel Quantity

Bark (Dry) - 11.15 Tons/hr

3. Firing Rate

Wastepaper Rejects (Dry) - 3 Tons/hr

~~Bark Heat Input = 6500 (11.15) 2000 = 145 mmBtu/hr~~

Wastepaper Rejects = 8000 (3) 2000 = 48 mmBtu/hr

Total Heat Input = 193 mmBtu/hr

F. Allowable Emissions

PM (Carbonaceous Fuel) = 0.2 lb/mmBtu or 38.6 lb/hr

PM (Oil Fired) = 0.1 lb/mmBtu or 19.3 lb/hr

PM (Combinations of Carbonaceous Fuel and Oil limited to 193 mmBtu/hr. Allowable PM emissions for any combination shall be calculated based on the sum of the individual calculations for Carbonaceous and Oil Fuels.

OERTEL, HOFFMAN, FERNANDEZ & COLE, P A.

ATTORNEYS AT LAW

SUZANNE BROWNLESS
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R. L. CALEEN, JR.
C. ANTHONY CLEVELAND
TERRY COLE
ROBERT C. DOWNIE, II
MARTHA J. EDENFIELD
SEGUNDO J. FERNANDEZ
KENNETH F. HOFFMAN
KENNETH G. OERTEL
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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. R. E.
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

October 26, 1990

Post-It™ brand fax transmittal memo 7671		# of pages ▶
To <i>Chuck Schrant</i>	From <i>Curt Barton</i>	
Co.	Co.	
Dept.	Phone #	
Fax # <i>312 853 7312</i>	Fax #	

Mr. Steve Smallwood
Bureau of Air Quality Management
Department of Environmental Regula
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Refurbishment or replacement of
Seminole Kraft Bark Boilers; Changing Fuel Mix

Dear Steve:

The purpose of this letter is to confirm your previous discussion with Julie Blunden, Curt Barton, and me concerning refurbishment or replacement of existing bark boilers, or the use of such boilers to burn recycled fiber rejects as well as bark.

As you know, Seminole Kraft Corporation proposes to convert its Jacksonville mill to a 100% recycle operation. This will benefit the community in many ways, including reducing the need to landfill used corrugated containers and eliminating all TRS emissions.

In processing the recycled fiber a certain amount of rejects will be produced which must be burned or landfilled. Due to the volume of rejects generated over the long term, incineration is preferred. The fiber rejects have a high energy content and they can be efficiently burned with bark (also generated on-site) in boilers adequate for this purpose.

The DER permitting requirements for boilers used for this purpose would depend on whether the AES Cedar Bay/Seminole Kraft Co-generation Project is ultimately certified.

Permitting Requirements if AES Cedar Bay/Seminole Kraft Project is Certified:

If the Co-generation Project is certified, Condition IID of the proposed Conditions of Certification (revised 7-19-90) requires

Mr. Steve Smallwood
October 26, 1990
Page 2

that Power Boiler Nos. 1 through 3 and Bark Boiler Nos. 1 and 2 are to be "permanently shut down and made incapable of operation" at the time initial compliance tests on the AESCB boilers are completed. This provision constitutes a federally enforceable permit condition upon final action by the Siting Board and Secretary.

In light of this condition, the same permitting requirements apply irrespective of whether a new boiler is constructed to burn bark and fiber rejects or an existing boiler is refurbished for this purpose. These requirements would consist of the applicable federal and state New Source Performance Standard; assurance that ambient air quality standards will not be violated; and Prevention of Significant Deterioration (PSD) review in the absence of creditable emission reductions such as those resulting from the shut-down of the Kraft Recovery Boilers. See Rule 17-2.500, F.A.C. There is no prohibition against applying for a new source permit because of a federally enforceable condition requiring retirement of an existing source.

Permitting Requirements for Bark Boilers if AES Cedar Bay/Seminole Kraft Project Not Certified:

The permitting requirements are different, however, if the proposed Co-generation Project is not certified. The existing Bark Boiler(s) are capable of being used to burn the fiber rejects as well as bark.

It appears that the change in fuel content -- from 100% bark to a 75% bark/25% fiber reject mix -- does not constitute a modification for purposes of applying new source performance standards or PSD review. This is because of the way "modification" is defined and the specific exemption to that definition.

Modification is defined in 40 CFR §60.2 (also found in Chapter 17-2, F.A.C.) as:

Any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

Mr. Steve Smallwood
October 26, 1990
Page 3

There is, however, an exception to the definition which applies to use of an alternative fuel or raw material if prior to the applicable date of the regulation the existing facility was capable of accommodating an alternative fuel use. A "facility" is capable of accommodating an alternative fuel use if the use could be accomplished under the facility's construction specifications as amended prior to the change. 40 CFR §60.14(e)(4).

DER rules contain a similar exemption. Rule 17-2.500(2)(c)4, F.A.C., exempts the use of an alternative fuel which the facility was capable of accommodating before January 6, 1975, unless such change is prohibited under any federally enforceable permit condition established after January 6, 1975.

Since prior to January 6, 1975, the bark boilers were capable of burning the reject fibers in the percentages anticipated, and still are, they fall within the exception to the general NSPS requirement.

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Consequently, under the situation described, the switch in fuel mixture would not be a major modification requiring PDS review. Seminole Kraft would, however, notify the Department before burning the reject fibers and answer any questions concerning it.

Mr. Steve Smallwood
October 26, 1990
Page 4

I would appreciate your confirming my understanding of our discussion. Please do not hesitate to provide corrections or clarification where needed. Thank you for your cooperation.

Sincerely,


Terry Cole

TC/kp

cc: Curt Barton
Julie Blunden

s-smallw.ltr



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 (AESCB) 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.

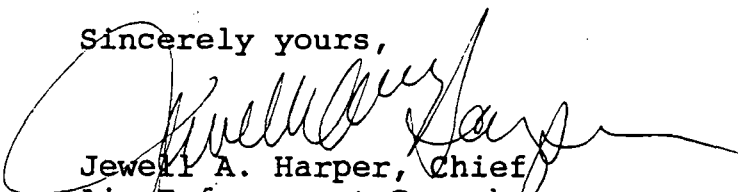
If the bark boilers were not capable of firing the alternative fuel prior to August 17, 1971, then they could be subject to either Subparts D or E or both if an increase in the emission rate of a regulated pollutant occurs. In addition, in order for Subpart E to apply, the combination of bark and fiber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

May 29, 1991

Seminole Kraft

1. Recycle Project: Financing complete, engineering done, const started, equipment ordered, hopes to be running late summer 1992 ~~_____~~

2. Bark boiler AES Jan 94 - startup
Apr 94 - commercial

continue to operate 1 1/2 years
burn $1/2 \times 10^5$ gal oil now

25% { 75% fibre
10% sawdust
10% plastic
5% wire, glass

Missoula, Mt.

3. PSD req of SO₂, NOx < modelled SO₂ problem in Jax >



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

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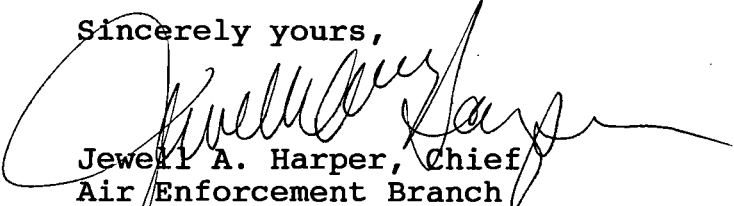
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With regard to PSD, since the bark boilers were capable of firing bark and fiber refuse prior to January 6, 1975, then PSD review would not be required.

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

To: BA/CHF
Date: 12-10-90 @ 10:40 a.m.
Subj: Paul Reierman @ EPA
From: Received via phone by Bruce Mitchell

Comments on CHF's letter to EPA on S&C's proposed project:

- ① Describe in detail "recycle fiber". It may implicate Subpart C.
- ② If the AES project is approved, will there be a specific condition in the permits (P.B's 1-3, BB's 1-2 and the AES boilers) to prevent a significant increase in emissions while dually operating (i.e., shake down and testing)?
- ③ If the AES is not approved, and the "recycle fiber" is to be fired in the BB's 1-2, then what ^{fuel(s)} was each boiler originally designed to fire (MSPS purposes)?

Paul said that a hard copy will be sent to CHF.

12-10-90

Bruce

Bruce

~~BA~~
~~cos~~

PYI. Please initial
and forward. Return
to me for filing.

Blanton

Bruce



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

November 21, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Ms. Jewell A. Harper, Chief
Air Enforcement Branch
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Ms. Harper:

Re: Seminole Kraft Corporation: Use of Recycling Fiber as a
Fuel in an Existing Boiler(s)

The Department's Bureau of Air Regulation received a letter requesting an interpretation and rule applicability to a proposed operational change at SKC's existing facility. The letter has been enclosed. Prior to sending SKC a response from us, we would appreciate your consideration, review, and a response on how EPA would interpret the proposal that is presented.

If there are any questions, please call Mr. Bruce Mitchell or me at 904-488-1344 or write to me at the above address. A timely response would be very much appreciated.

Sincerely,

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

CHF/BM/plm

Enclosure

c: A. Kutyna, NE Dist.
R. Roberson, BESD
G. Smallridge, OGC
T. Cole, OHF&C

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. ~~Clain~~ AI: DARM 021
2. Due: 11/15/90
3. Barry 11/1
4. Bruce rec'd 11-21-90

Remarks:

Prepare response for SSM
Signature

need to draft response and needs to be
of by OGC. This is an important
policy issue — Clain

To Bruce 11/20

From:

Sudy

Date

10/31/90

Phone

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October 26, 1990

RECEIVED

OCT 29 1990

DER-BAQM

Mr. Steve Smallwood
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Refurbishment or replacement of
Seminole Kraft Bark Boilers; Changing Fuel Mix

Dear Steve:

The purpose of this letter is to confirm your previous discussion with Julie Blunden, Curt Barton, and me concerning refurbishment or replacement of existing bark boilers, or the use of such boilers to burn recycled fiber rejects as well as bark.

As you know, Seminole Kraft Corporation proposes to convert its Jacksonville mill to a 100% recycle operation. This will benefit the community in many ways, including reducing the need to landfill used corrugated containers and eliminating all TRS emissions.

In processing the recycled fiber a certain amount of rejects will be produced which must be burned or landfilled. Due to the volume of rejects generated over the long term, incineration is preferred. The fiber rejects have a high energy content and they can be efficiently burned with bark (also generated on-site) in boilers adequate for this purpose.

The DER permitting requirements for boilers used for this purpose would depend on whether the AES Cedar Bay/Seminole Kraft Co-generation Project is ultimately certified.

Permitting Requirements if AES Cedar Bay/Seminole Kraft Project is Certified:

If the Co-generation Project is certified, Condition IID of the proposed Conditions of Certification (revised 7-19-90) requires

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that Power Boiler Nos. 1 through 3 and Bark Boiler Nos. 1 and 2 are to be "permanently shut down and made incapable of operation" at the time initial compliance tests on the AESCB boilers are completed. This provision constitutes a federally enforceable permit condition upon final action by the Siting Board and Secretary.

In light of this condition, the same permitting requirements apply irrespective of whether a new boiler is constructed to burn bark and fiber rejects or an existing boiler is refurbished for this purpose. These requirements would consist of the applicable federal and state New Source Performance Standard; assurance that ambient air quality standards will not be violated; and Prevention of Significant Deterioration (PSD) review in the absence of creditable emission reductions such as those resulting from the shut-down of the Kraft Recovery Boilers. See Rule 17-2.500, F.A.C. There is no prohibition against applying for a new source permit because of a federally enforceable condition requiring retirement of an existing source.

Permitting Requirements for Bark Boilers if AES Cedar Bay/Seminole Kraft Project Not Certified:

The permitting requirements are different, however, if the proposed Co-generation Project is not certified. The existing Bark Boiler(s) are capable of being used to burn the fiber rejects as well as bark.

It appears that the change in fuel content -- from 100% bark to a 75% bark/25% fiber reject mix -- does not constitute a modification for purposes of applying new source performance standards or PSD review. This is because of the way "modification" is defined and the specific exemption to that definition.

Modification is defined in 40 CFR §60.2 (also found in Chapter 17-2, F.A.C.) as:

Any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

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There is, however, an exception to the definition which applies to use of an alternative fuel or raw material if prior to the applicable date of the regulation the existing facility was capable of accommodating an alternative fuel use. A "facility" is capable of accommodating an alternative fuel use if the use could be accomplished under the facility's construction specifications as amended prior to the change. 40 CFR §60.14(e)(4).

DER rules contain a similar exemption. Rule 17-2.500(2)(c)4, F.A.C., exempts the use of an alternative fuel which the facility was capable of accommodating before January 6, 1975, unless such change is prohibited under any federally enforceable permit condition established after January 6, 1975.

Since prior to January 6, 1975, the bark boilers were capable of burning the reject fibers in the percentages anticipated, and still are, they fall within the exception to the general NSPS requirement.

EPA and DER rules also subject "major modifications" of existing facilities to PSD review. Such modifications are generally defined as any physical change in, or change in the method of operation of, a major stationary source which would result in a significant net emissions increase of any pollutants subject to regulation. The rules also contain, however, an exemption for a physical change or change in method of operation for the use of an alternative fuel or raw material which the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition established after January 6, 1975. 40 CFR 52.21(2)(d); see also §17-2.500(2)(c)4., F.A.C.

Consequently, under the situation described, the switch in fuel mixture would not be a major modification requiring PDS review. Seminole Kraft would, however, notify the Department before burning the reject fibers and answer any questions concerning it.

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I would appreciate your confirming my understanding of our discussion. Please do not hesitate to provide corrections or clarification where needed. Thank you for your cooperation.

Sincerely,


Terry Cole

TC/kp

cc: Curt Barton
Julie Blunden

s-smallw.ltr