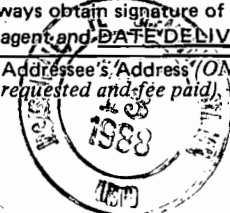


SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.
 1. Show to whom delivered, date, and addressee's address. Restricted Delivery
 ↑(Extra charge)↑ ↑(Extra charge)↑

3. Article Addressed to: Mr. T. Frank Lee, General Manager Seminole Kraft Corp. 9469 Eastport Road P.O. Box 26998 Jacksonville, FL 32218	4. Article Number P 702 175 419 Type of Service: <input type="checkbox"/> Registered <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.
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid) 
6. Signature - Agent X <i>[Handwritten Signature]</i>	
7. Date of Delivery	

Form 3811, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 DOMESTIC RETURN RECEIPT

P 702 175 419
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to Frank Lee, Gen. Mgr.	
Seminole Kraft Corp.	
Street and No. 9469 Eastport Road	
P.O. Box 26998	
State and ZIP Code Jacksonville, FL 32218	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark Date 05/12/88	
Permits: AC 16-141790, -792, -793, -798, -799, -800, -801	

PS Form 3800, June 1985



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMIT

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

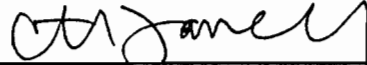
May 12, 1988

Enclosed are permits Nos. AC 16-141790, 16-141792, 16-41793, 16-141798, 16-141799, 16-141800 and 16-141801, for Seminole Kraft Corporation (SKC) to make several changes at its existing facility in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2, which includes replacement of some existing equipment, addition of some existing and new equipment, and upgrading the existing noncondensable gas (NCG) handling system from various sources. The TRS gases will be incinerated in either the No. 2 or 3 Lime Kiln. The location of the proposed project will be at SKC's existing facility in Jacksonville, Duval County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copy furnished to:

B. Stewart, NE Dist.
B. Pittman, Esq.
C. Barton, SCC

J. McKinnon, P.E. SCC
K. Mehta, BESD
T. Cole, Esq.

Final Determination

Seminole Kraft Corporation
Duval County
Jacksonville, Florida

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

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

May 9, 1988

Final Determination

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

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

A. April 18, 1988 letter.

1. AC 16-141790:

Specific Conditions:

a. No. 3:

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

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

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

b. No. 4:

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

From: The maximum pollutant emissions shall not exceed:

- a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
- b) Visible Emissions (VE): 10% Opacity or less
- c) TRS: 20 ppmvd @ standard conditions corrected to 10% O₂, as a 12-hr avg. (1.86 lbs/hr, 8.2 TPY)
- d) SO₂: assumed to be zero for PSD tracking purposes

To: The maximum pollutant emissions shall not exceed:

- a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
- b) Visible Emissions (VE): 10% Opacity or less
- c) TRS: 20 ppmvd @ standard conditions corrected to 10% O₂, as a 12-hr avg. (1.86 lbs/hr, 8.2 TPY)

c. No. 5:

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

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

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

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

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

d. No. 11:

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

From: The No. 1 Lime Kiln shall be tested one-time only for SO₂ emissions to establish the overall removal efficiency of the lime kiln and its associated scrubber system. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

To: The No. 1 Lime Kiln shall be tested one-time only for SO₂ emissions to establish the level of SO₂ for PSD tracking purposes. The test shall be performed using EPA Method 6 in

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

e. No. 13: 1st Paragraph

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

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

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

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

Specific Conditions:

a. No. 3:

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

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

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

b. No. 4:

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

1) AC 16-141792

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

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

2) AC 16-141793

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

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

c. No. 5:

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

From: The maximum pollutant emissions shall not exceed:

- a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
- b) Visible Emissions (VE): 10% Opacity or less
- c) TRS: 20 ppmvd @ standard conditions corrected to 10% O₂, as a 12-hr avg. (2.06 lbs/hr, 9.0 TPY)
- d) SO₂: assumed to be zero for PSD tracking purposes

To: The maximum pollutant emissions shall not exceed:

- a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
- b) Visible Emissions (VE): 10% Opacity or less
- c) TRS: 20 ppmvd @ standard conditions corrected to 10% O₂, as a 12-hr avg. (2.06 lbs/hr, 9.0 TPY)

d. No. 6:

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

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

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

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

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

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

e. No. 13:

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

1) AC 16-141792

From: The No. 2 Lime Kiln shall be tested one-time only for SO₂ emissions to establish the overall removal efficiency of the lime kiln and its associated scrubber system. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

To: The No. 2 Lime Kiln shall be tested one-time only for SO₂ emissions for PSD tracking purposes. The test shall be performed using EPA Method 6 in accordance with FAC Rule 17-2.700(6)(b)6 or other test method previously approved by the Department and approved by the Department for this permit. The results will be used to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

2) AC 16-141793

From: the No. 3 Lime Kiln shall be tested one-time only for SO₂ emissions to establish the overall removal efficiency of the lime kiln and its associated scrubber system. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00

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

To: The No. 3 Lime Kiln shall be tested one-time only for SO₂ emissions for PSD tracking purposes. The test shall be performed using EPA Method 6 in accordance with FAC Rule 17-2.700(6)(b)6 or other test method previously approved by the Department and approved by the Department for this permit. The results will be used to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

f. No. 15: 1st Paragraph

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

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

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

3. AC 16-141798:

Specific Conditions:

a. No. 2:

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

b. No. 3:

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

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

17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

To: The Nos. 1 and 2 batch digester systems are subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.a., which requires combustion of the TRS gases in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

c. No. 8:

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

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

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

d. No. 13: 1st Paragraph

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

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

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

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

e. No. 15:

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

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

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

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

Specific Conditions:

a. No. 2:

Response: See B.2. of the Final Determination

b. No. 3:

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

From: The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

To: The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.a., which requires combustion of the TRS gases in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

c. No. 7:

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

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

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

d. No. 13: 1st Paragraph

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

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

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

e. No. 15:

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

1) AC 16-141799

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

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

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

2) AC 16-141800

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

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

3) AC 16-141801

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

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

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

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

1. AC 16-141798:

Specific Condition:

a. No. 2:

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

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

To:

- 2.a. For PSD purposes, the annual production rate of the Nos. 1 and 2 Batch Digester Systems will be 685,000 TPY ADP (tons per year, air dry pulp).
- b. For NSPS purposes, the maximum production rate of the Nos. 1 and 2 Batch Digester Systems will be 120 TPH ADP (tons per hour, air dry pulp) and 1987 TPD ADP (tons per day, air dry pulp).
- c. For testing purposes, the maximum production rate of the Nos. 1 and 2 Batch Digester Systems will be 82.8 TPH ADP (tons per hour, air dry pulp). Tests for compliance will be performed with the control device (No. 2 and 3 Lime Kiln) operating at 90-100% of maximum Lime Kiln operating rate and with digester systems 1 and 2 operating as near the maximum production rate as possible, but in no case shall the operating rate of the digesters be less than 85% of the maximum production rate.

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

Specific Condition:

a. No. 2:

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

1) AC 16-141799

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

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

2) AC 16-141800

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

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

3) AC 16-141801

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

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

C. May 4, 1988 conference phone call.

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

Attachments to be Incorporated:

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

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

B. AC 16-141798

8. Mr. Terry Cole's letter dated April 14, 1988, and received April 14, 1988.

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

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

11. Mr. Terry Cole's submittal dated May 4, 1988, and received May 5, 1988.

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

8. Mr. Terry Cole's letter dated April 14, 1988, and received April 14, 1988.

9. Mr. Terry Cole's letter revised April 14, 1988, and received April 14, 1988

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

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



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

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

Permit Number: AC 16-141790
Expiration Date: March 27, 1990
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W

Project: No. 1 Lime Kiln

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

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

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

The Standard Classification Codes are: Pulp & Paper Industry

A. Pulp and Paper Industry

Major Group: 26 Sulfate (Kraft) Pulping
o Lime Kiln 3-07-001-06

B. Mineral Products

Major Group 32: Lime Manufacture
o Calcining-Rotary Lime Kiln 3-05-016-04

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

ATTACHMENTS

AC 16-141790

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

1. The lime kiln may operate continuously, i.e., 8760 hrs/yr.
2. The maximum lime production rate shall not exceed 12,200 lbs CaO/hr (dry) and is based on a total process input rate of 24,000 lbs/hr lime mud (dry).
3. The No. 6 Fuel Oil firing rate shall not exceed 60 MMBtu/hr heat input. The sulfur content of the fuel oil shall not exceed 2.3% by weight.

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

4. The maximum pollutant emissions shall not exceed:

- a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
- b) Visible Emissions (VE): 10% Opacity or less
- c) TRS: 20 ppmvd @ standard conditions corrected to 10% O₂, as a 12-hr average (1.86 lbs/hr, 8.2 TPY)

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

11. The No. 1 Lime Kiln shall be tested one-time only for SO₂ emissions to establish the level of SO₂ for PSD tracking purposes. The test(s) shall be performed using EPA Method 6 in accordance with FAC Rule 17-2.700(6)(b)6 or any other test method previously approved by the Department and approved by the Department for this permit.

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

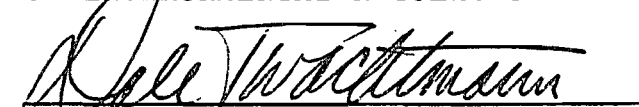
13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results and the Certificate of Completion, to the BESD office 90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

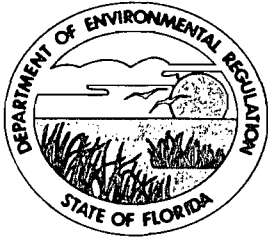
If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct. (FAC Rule 17-4)

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

Issued this 10 day of May,
1988.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

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

Permit Number: AC 16-141792
Expiration Date: March 27, 1990
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W

Project: No. 2 Lime Kiln

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

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

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

The Standard Classification Codes are: Pulp & Paper Industry

A. Pulp and Paper Industry

Major Group: 26 Sulfate (Kraft) Pulping
o Lime Kiln 3-07-001-06

B. Mineral Products

Major Group 32: Lime Manufacture
o Calcining-Rotary Lime Kiln 3-05-016-04

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

ATTACHMENTS

AC 16-141792

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

5. The maximum pollutant emissions shall not exceed:

- a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
- b) Visible Emissions (VE): 10% Opacity or less
- c) TRS: 20 ppmvd @ standard conditions corrected to 10% O₂, as a 12-hr average (1.95 lbs/hr, 8.5 TPY)

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

13. The No. 2 Lime Kiln shall be tested one-time only for SO₂ emissions to establish the level of SO₂ for PSD tracking purposes. The test(s) shall be performed using EPA Method 6 in accordance with FAC Rule 17-2.700(6)(b)6 or other test methods previously approved by the Department and approved by the Department for this permit. The results will be used to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

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

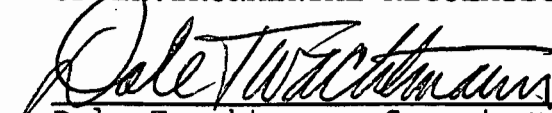
15. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan,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

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

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

Issued this 10 day of May,
1988.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

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

Permit Number: AC 16-141793
Expiration Date: March 27, 1990
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W

Project: No. 3 Lime Kiln

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

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

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

A. Pulp and Paper Industry

Major Group: 26 Sulfate (Kraft) Pulping
o Lime Kiln 3-07-001-06

B. Mineral Products

Major Group 32: Lime Manufacture
o Calcining-Rotary Lime Kiln 3-05-016-04

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

ATTACHMENTS

AC 16-141793

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

5. The maximum pollutant emissions shall not exceed:

- a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
- b) Visible Emissions (VE): 10% Opacity or less
- c) TRS: 20 ppmvd @ standard conditions corrected to 10% O₂, as a 12-hr average (2.06 lbs/hr, 9.0 TPY)

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

13. The No. 3 Lime Kiln shall be tested one-time only for SO₂ emissions to establish the level of SO₂ for PSD tracking purposes. The tests shall be performed using EPA Method 6 in accordance with FAC Rule 17-2.700(6)(b)6 or other test methods previously approved by the Department and approved by the Department for this permit. The results will be used to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

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

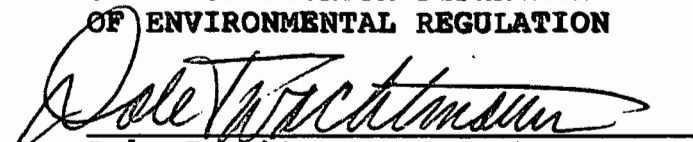
15. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan,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

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

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

Issued this 10 day of May,
1988.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

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

Permit Number: AC 16-141798
Expiration Date: September 24, 1989
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W

Project: Nos. 1 and 2 Batch Digester
Systems

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

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

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

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

ATTACHMENTS

AC 16-141798

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

3. The Nos. 1 and 2 batch digester systems are subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.a., which requires combustion of the TRS gases in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

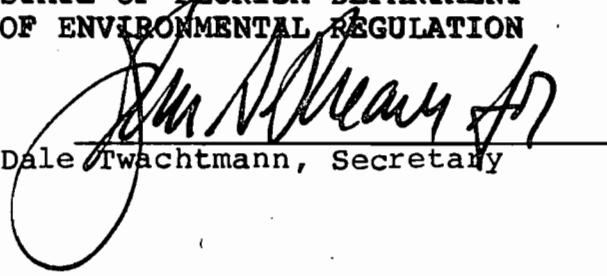
16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO₂ emissions. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

PERMITTEE:
Seminole Kraft Corp.

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

Issued this 11th day of May,
1988.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

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

Permit Number: AC 16-141799
Expiration Date: September 24, 1989
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W

Project: No. 1 Multiple Effect
Evaporator System

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

For the permitting of the No. 1 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s), concentrator(s) and the new noncondensable gas (NCG) handling system constructed to collect and transport all of the NCG emissions from the MEE System to the No. 2 or 3 Lime Kiln for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 744.2 km East and 3365.6 km North.

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

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

ATTACHMENTS

AC 16-141799

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

3. The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.a., which requires combustion of the TRS gases in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

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

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

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

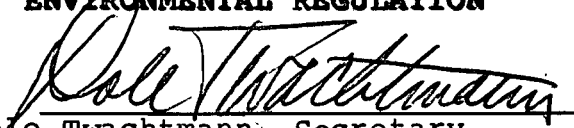
14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to DER's Bureau of Air Quality Management office and the BESD office.

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

16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO₂ emissions. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

Issued this 10 day of July,
1988.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

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

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

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

For the permitting of the No. 2 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s), concentrator(s) and the new noncondensable gas (NCG) handling system constructed to collect and transport all of the NCG emissions from the MEE System to the No. 2 or 3 Lime Kiln for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 744.2 km East and 3365.6 km North.

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

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

ATTACHMENTS

AC 16-141800

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

3. The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.a., which requires combustion of the TRS gases in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

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

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

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

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

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

16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO₂ emissions. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

Issued this 10 day of May,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

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

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

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

For the permitting of the No. 3 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s), concentrator(s) and the new noncondensable gas (NCG) handling system constructed to collect and transport all of the NCG emissions from the MEE System to the No. 2 or 3 Lime Kiln for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 744.2 km East and 3365.6 km North.

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

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

ATTACHMENTS

AC 16-141801

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

3. The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.a., which requires the combustion of the TRS gases in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

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

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

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

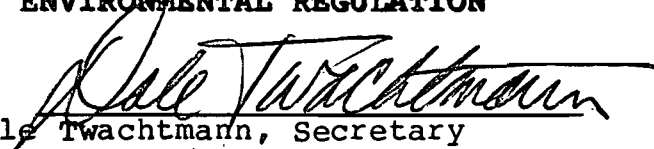
14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to DER's Bureau of Air Quality Management office and the BESD office.

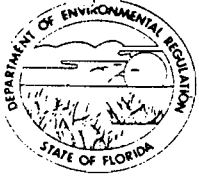
15. The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the lime kilns are the TRS control devices for the No. 3 MEE system.

16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO₂ emissions. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

Issued this 10 day of May,
1988.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtman, Secretary



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: Dale Twachtmann
 FROM: Howard L. Rhodes *HLR*
 SUBJ: Approval of Seminole Kraft Corporation
 State Construction Permit Numbers:
 AC 16-141790, -141792, -141793, -141798, -141799
 -141800, and 141801
 DATE: May 9, 1988

Attached for your approval and signature are permits prepared by Central Air Permitting for the above mentioned company to make several changes at its existing mill in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in FAC Rule 17-2 and the terms contained in the Consent Order, OGC Case No. 86-1405. The facility is located in Jacksonville, Duval County, Florida. Comments were received during the public notice period.

Day 90, after which these permits will be issued by default, is May 26, 1988.

I recommend your approval and signature.

HLR/aqm/bm *HLR*
 attachments

Howard-
 This is the one
 with the May 12
 date. (by Consent Order)
 to start construction
 the digesters.
 It would be
 helpful if Dale could
 sign these today.
 Steve.

Check Sheet

Company Name: Seminole Kraft Corporation
Permit Number: AC 16-141790, -92, -93, -98, -99, -800, -801
PSD Number: _____
Permit Engineer: _____

Application:

- 7 Initial Application ^{798, 799, 800, 801, 790, 793, 793}
 Incompleteness Letters
 Responses
 Waiver of Department Action
 Department Response
 Other

Cross References:

- A016-116140
 A016-116141
 A016-116142
A016-116143

Intent:

- Intent to Issue
 Notice of Intent to Issue
 Technical Evaluation
 BACT or LAER Determination
7 Unsigned Permit ^{790, 792, 793, 798, 799, 800, 801}
Correspondence with:
 EPA
 Park Services
 Other
 Proof of Publication
 Petitions - (Related to extensions, hearings, etc.)
 Waiver of Department Action
 Other

Final

Determination:

- Final Determination
7 Signed Permit ^{790, 792, 793, 798, 799, 800, 801}
 BACT or LAER Determination
 Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
 Other



Interoffice Memorandum

For Routing To Other Than The Addressee

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

To: Air Quality

From: David M. Beebe, Assistant Chief *DMB*
Bureau of Finance and Accounting

Date: 1-09-89

Subject: Refund of Fees

Your application for refund for Seminole Kraft Corporation

File# AC161417989, is complete.

State of Florida Warrant 4 23978780, dated 5-31-88 and
in the amount of \$ 900.00, was mailed 6-2-88.

DMB/lis

Refund processed on Agency Voucher C 06137

Fiscal Year 88-89



Interoffice Memorandum

For Routing To Other Than The Addressee

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

To: Air Quality

From: David M. Beebe, Assistant Chief *DMB*
Bureau of Finance and Accounting

Date: 1-09-89

Subject: Refund of Fees

Your application for refund for Seminole Kraft Corporation

File# AC161417999, is complete.

State of Florida Warrant 4 23978.781, dated 5-31-88 and
in the amount of \$ 900.00, was mailed 6-2-88.

DMB/lis

Refund processed on Agency Voucher C 06137

Fiscal Year 88-89



Interoffice Memorandum

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

To: Air Quality
From: David M. Beebe, Assistant Chief *Dmb*
Bureau of Finance and Accounting
Date: 1-09-89
Subject: Refund of Fees

Your application for refund for Seminole Kraft Corporation
File# AC 161418009, is complete.
State of Florida Warrant 4 23978.82, dated 5-31-88 and
in the amount of \$ 900.00, was mailed 6-2-88.

DME/lis

Refund processed on Agency Voucher C 06137
Fiscal Year 88-89



Interoffice Memorandum

For Routing To Other Than The Addressee

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

To: Air Quality
From: David M. Beebe, Assistant Chief *DMB*
Bureau of Finance and Accounting
Date: 1-09-89
Subject: Refund of Fees

Your application for refund for Seminole Kraft Corporation
File# AC 161418019, is complete.
State of Florida Warrant 4 23978 83, dated 5-31-88 and
in the amount of \$ 900.00, was mailed 6-2-88.

DMB/lis

Refund processed on Agency Voucher C 06137
Fiscal Year 88-89



Interoffice Memorandum

For Routing To Other Than The Addressee

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

To: Air Quality

From: David M. Beebe, Assistant Chief *DMB*
Bureau of Finance and Accounting

Date: 1-09-89

Subject: Refund of Fees

Your application for refund for Seminole Kraft Corporation

File# AC 161417909, is complete.

State of Florida Warrant 4 23978⁵ 84, dated 5-31-88 and
in the amount of \$ 900.00, was mailed 6-2-88.

DMB/lis

Refund processed on Agency Voucher C 06137

Fiscal Year 88-89

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. SMAFFER
ASSISTANT DISTRICT MANAGER

Permittee:

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

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

County:

Latitude/Longitude:

UTM:

Project:

Revised:

31-16-0067-29

AO16-116143

February 5, 1987

September 24, 1989

Duval

30:25:15/81:36:00

E-7441.750 N-3365.600

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 application received February 6, 1986
- (2) Additional information received on November 13, 1986 in response to BioEnvironmental Services Division (BESD) letter dated March 6, 1986

RECEIVED

OCT 17 1988

DER - BAQM

Permittee:
Seminole Kraft Corporation

I.D. Number: 31-16-0067-29
Permit/Certification Number: AO16-116143
Date of Issue: February 5, 1987
Expiration Date: September 24, 1989
Revised:

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:
Revised:

31-16-0067-29
AO16-116143
February 5, 1987
September 24, 1989

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: 31-16-0067-29
Permit/Certification Number: AO16-116143
Date of Issue: February 5, 1987
Expiration Date: September 24, 1989
Revised:

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. 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 RM 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 Kilns No. 2 or No. 3

Permittee:
Seminole Kraft Corporation

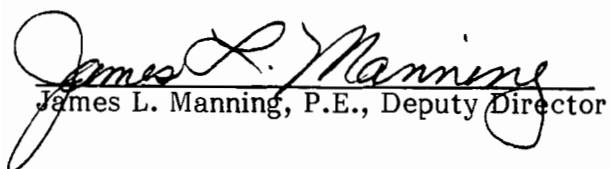
I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:
Revised:

31-16-0067-29
AO16-116143
February 5, 1987
September 24, 1989

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.
12. Final compliance shall be demonstrated as expeditiously as possible, but no later than 662 days after start-up or nine (9) months prior to May 12, 1989 (i.e.: August 12, 1988), whichever occurs first. This schedule is in accordance with Paragraph 23, Consent Order OGC Case No. 86-1405 filed October 29, 1986.
13. The permittee shall minimize TRS emission from MEE No. 3 by:
 - A. Maintaining evaporator ductwork to minimize air infiltration.
 - B. Properly operating cooling towers.
14. The permittee shall vent TRS emissions only in accordance with Rule 17-2.600(4)(c)l.c., FAC.

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, NE District Manager

- 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: 4/12rj)

CERTIFICATION

FACILITY SEMINOLE KRAFT CORP.
SOURCE MULTIPLE EFFECT EVAPORATOR NO. 3
APPLICATION NUMBER 116143

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).

MR. KHURSHID MEHTA
NAME, P.E.

Khurshid Mehta 10/5/88
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
GARY L. SHAFFER
ASSISTANT DISTRICT MANAGER

Permittee:	I.D. Number:	31-16-0067-28
Seminole Kraft Corporation	Permit/Certification Number:	AO16-116142
Post Office Box 26998	Date of Issue:	February 5, 1987
Jacksonville, FL 32218-0998	Expiration Date:	September 24, 1989
	County:	Duval
	Latitude/Longitude:	30:25:15/81:36:00
	UTM:	E-7441.750 N-3365.600
	Project:	Multiple Effect Evaporator No. 2
	Revised:	

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:

<u>Point No.</u>	<u>Source</u>
28	MEE No. 2

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

- (1) Permit application received February 6, 1986
- (2) Additional information received on November 13, 1986 in response to BioEnvironmental Services Division (BESD) letter dated March 6, 1986

RECEIVED

OCT 17 1988

Page 1 of 5

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

DER - BAQM

Best Available Copy

Permittee:

Seminole Kraft Corporation

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

31-16-0067-28

AO16-116142

February 5, 1987

September 24, 1989

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life, or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida 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:

31-16-0067-28

Permit/Certification Number:

AO16-116142

Date of Issue:

February 5, 1987

Expiration Date:

September 24, 1989

Revised:

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 Statute or department rules.
11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rule 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permittee's 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:
Revised:

31-16-0067-28
AO16-116142
February 5, 1987
September 24, 1989

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. 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 RM 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 Kilns No. 2 or No. 3

Permittee:
Seminole Kraft Corporation

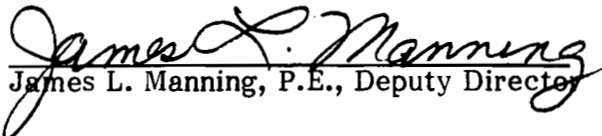
I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:
Revised:

31-16-0067-28
AO16-116142
February 5, 1987
September 24, 1989

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.
12. Final compliance shall be demonstrated as expeditiously as possible, but no later than 662 days after start-up or nine (9) months prior to May 12, 1989 (i.e.: August 12, 1988), whichever occurs first. This schedule is in accordance with Paragraph 23, Consent Order OGC Case No. 86-1405 filed October 29, 1986.
13. The permittee shall minimize TRS emission from MEE No. 2 by:
 - A. Maintaining evaporator ductwork to minimize air infiltration.
 - B. Properly operating cooling towers.
14. The permittee shall vent TRS emissions only in accordance with Rule 17-2.600(4)(c)l.c., FAC.

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, NE District Manager

¹ Florida Administrative Code
² Jacksonville Environmental Protection Board

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
Post Office Box 26998
Jacksonville, FL 32218-0998

I.D. Number:

31-16-0067-27

Permit/Certification Number:

AO16-116141

Date of Issue:

February 5, 1987

Expiration Date:

September 24, 1989

County:

Duval

Latitude/Longitude:

30:25:15/81:36:00

UTM:

E-7441.750 N-3365.600

Project:

Multiple Effect
Evaporator No. 1

Revised:

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 application received February 6, 1986
- (2) Additional information received on November 13, 1986 in response to Bio-Environmental Services Division (BESD) letter dated March 6, 1986

RECEIVED

Page 1 of 5

OCT 17 1988

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

DER - BAQM

Best Available Copy

Permittee:
Seminole Kraft Corporation

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

31-16-0067-27
AO16-116141
February 5, 1987
September 24, 1989

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life, or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.
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.

Best Available Copy

Permittee:

Seminole Kraft Corporation

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

31-16-0067-27

AO16-116141

February 5, 1987

September 24, 1989

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 Rule 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:
Revised:

31-16-0067-27
AO16-116141
February 5, 1987
September 24, 1989

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. 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>	<u>¹FAC</u>	<u>²JEPB</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

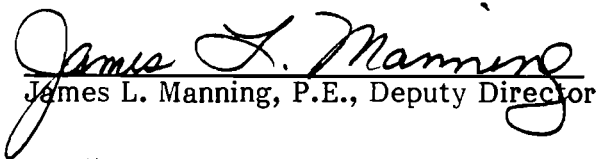
I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:
Revised:

31-16-0067-27
AO16-116141
February 5, 1987
September 24, 1989

11. Final compliance shall be demonstrated as expeditiously as possible, but no later than 662 days after start-up or nine (9) months prior to May 12, 1989 (i.e.: August 12, 1988), whichever occurs first. This schedule is in accordance with paragraph 23, Consent Order OGC Case No. 86-1405 filed October 29, 1986.
12. The permittee shall minimize TRS emission from MEE No. 1 by:
 - A. Maintaining evaporator ductwork to minimize air infiltration.
 - B. Properly operating cooling towers.
13. The permittee shall vent TRS emissions in accordance with Rule 17-2.600(4)(c)1.c., FAC.

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, NE District Manager

- ¹ Florida Administrative Code
- ² Jacksonville Environmental Protection Board

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
 Post Office Box 26998
 Jacksonville, FL 32218-0998

I.D. Number: 31-16-0067-(24, 25)
Permit/Certification Number: AO16-116140
Date of Issue: February 5, 1987
Expiration Date: September 24, 1989
County: Duval
Latitude/Longitude: 30:25:15/81:36:00
UTM: E-7441.750 N-3365.600
Project: Batch Digester System
 No. 1 and 2

Revised:

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 thirteen identical batch digesters which can be used interchangeably to produce pulp for the No. 1 or the No. 2 pulping systems. Wood chips are combined with re-circulated black liquor and white liquor makeup in the batch digesters. Each batch is raised to an elevated pressure and temperature to cook. Each digester is vented during the cook to the condensers where the non-condensable gases (NCG) are discharged to the NCG system and the liquid condensate is discharged to the turpentine decanter. When the cook is completed, the batch is discharged to a blow tank. The off gases go to a hot water accumulator, where the steam is condensed and the remaining gases are vented to the NCG system. The No. 1 pulping system consists of a single blow tank and a single blow heat accumulator with a secondary condenser. The No. 2 pulping system consists of three blow tanks and a single blow heat accumulator system which includes a secondary and tertiary condenser. Both systems contain a separate but interchangeable digester relief condensing system for recovery of turpentine. The non-condensable gases from both of the blow heat accumulators as well as from both of the turpentine condensers are directed to the NCG collection system. The maximum gas discharge to the NCG system would be three simultaneous digester blows. There are no direct emissions to the atmosphere from this system.

Emission source(s) shall be as follows:

<u>Point No.</u>	<u>Source</u>
24	Batch Digester System No. 1
25	Batch Digester System No. 2

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

- (1) Permit application received February 6, 1986
- (2) Additional information received on November 13, 1986
- (3) Bio-Environmental Services Division letter dated March 6, 1986

RECEIVED

OCT 17 1988

DER - BAQM

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)	Initial
<i>REC 4</i>	Date
2.	Initial
<i>OCT 17 1988</i>	Date
3.	Initial
<i>DER - BAQM</i>	Date
4.	Initial
<i>Bruce Mitchell</i>	Date

REMARKS:

BAQM

Per your request.

INFORMATION

- Review & Return
- Review & File
- Initial & Forward

DISPOSITION

- Review & Respond
- Prepare Response
- For My Signature
- For Your Signature
- Let's Discuss
- Set Up Meeting
- Investigate & Report
- Initial & Forward
- Distribute
- Concurrence
- For Processing
- Initial & Return

FROM:

BESD

DATE

10/14/88

PHONE

Best Available Copy

Permittee:

Seminole Kraft Corporation

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

31-16-0067-(24, 25)

AO16-116140

February 5, 1987

September 24, 1989

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal plant or aquatic life, or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida 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.

Best Available Copy

Permittee:

Seminole Kraft Corporation

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

31-16-0067-(24, 25)

AO16-116140

February 5, 1987

September 24, 1989

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 Statute or department rules.
11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rule 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permittee 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:
Revised:

31-16-0067-(24, 25)
AO16-116140
February 5, 1987
September 24, 1989

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, Jacksonville Environmental Protection Board (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 (non-condensable gas [NCG] collection and transport system and lime kilns) shall be provided with a method of access that is safe and readily accessible. Stack sampling ports and platforms shall be required on the NCG system in accordance with Rule 17-2.700(4), FAC, and Rule 2.207, JEPB.
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>	<u>¹FAC</u>	<u>²JEPB</u>	<u>Other</u>
24	Total Reduced Sulphur (TRS)	17-2.600(4)(c)1.	2.202	
25	TRS	17-2.600(4)(c)1.	2.202	

8. The maximum allowable emissions at the final compliance date shall be as follows:

<u>Pt. No.</u>	<u>Pollutant</u>	<u>Other</u>
24	TRS	20 ppm*
25	TRS	20 ppm*

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

9. Operation of each digester system shall be limited to 8760 hours per year.

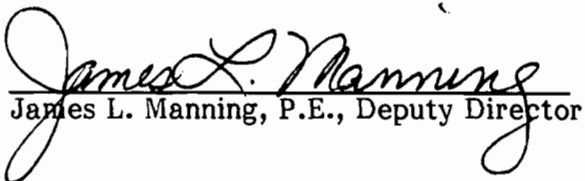
Permittee:
Seminole Kraft Corporation

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

31-16-0067-(24, 25)
AO16-116140
February 5, 1987
September 24, 1989

10. The maximum production rate of the Nos. 1 and 2 batch digester systems shall not exceed 1987 TPD ADP (tons per day of air dried pulp and based on a nominal utilization rate of 580,000 lbs/hr wood chips [dry] and 898,000 lbs/hr. of black/white liquor).
11. Final compliance shall be achieved as expeditiously as possible, but no later than 36 months after May 12, 1986 (i.e. May 12, 1989) in accordance with Rule 17-2.960(1)(d), FAC.
12. The permittee shall minimize TRS emission from the digester systems by:
 - A. Limiting simultaneous digester blows to the utmost extent practicable.
 - B. Maintaining all effluent gas ductwork and non-condensable gas collection and transport apparatus in digester systems in good operating condition.
 - C. Maintaining blow tank and hot water accumulator (including water spray apparatus) in digester systems in good operating condition.
 - D. Maintaining adequate water flow in hot water accumulator.
 - E. Maintaining condensers and turpentine system in proper operating order.
13. The permittee shall vent TRS emissions only in accordance with Rule 17-2.600(4)(c)1.c., FAC.

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, NE District Manager

- ¹ Florida Administrative Code
- ² Jacksonville Environmental Protection Board

APPLICATION FOR REFUND
FROM
STATE OF FLORIDA

Best Available Copy

STATE OF FLORIDA)

COUNTY OF _____)

Pursuant to the provisions of Section 215.26, or Section _____, Florida Statutes, I hereby apply for a refund and request that a State warrant be drawn in favor of:

NAME: Mr. T. Frank Lee, General Manager, Seminole Kraft Corporation

ADDRESS: 9469 Eastport Road, Post Office Box 26998
Jacksonville, FL 32218

AMOUNT: \$900.00, Permit No.: AC 16-141790 (No. 1 Lime Kiln)

which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

Reason for Claim: Over payment for processing of permit.

Receipt No. 76193

CERTIFIED TRUE AND CORRECT this 17 day of May 19 88

(Signature)

Form must be completed if authority is other than Section 215.26, Florida Statutes.

(FOR AGENCY USE ONLY)

Agency recommends denial of above claim based on the following facts, including statutory authority for collection: _____

or

Agency recommends approval of above claim and submits the following information to substantiate such claim.

The amount recommended \$ _____.

The amount requested above was originally deposited into the State Treasury, included on the State Treasurer's Receipt # _____, dated _____.

General Revenue _____
(Revenue Code)

Trust _____
(Name and Code Number of Trust Account)

Statutory Authority for Collection _____

It is requested that payment be made from:

Refund of Overpayment of Taxes - General Revenue-Refunds (1-441-0211)

Trust _____
(Name and Code Number of Trust Account)

CERTIFIED TRUE AND CORRECT this _____ day of _____ 19 _____

(Agency)
R. Bruce Mitchell
(Signature of Authorized Person)
Engineer IV
(Title)

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE RIGHT TO SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted as meaning three years from the date of payment into the State Treasury.

APPLICATION FOR REFUND
FROM
STATE OF FLORIDA

Best Available Copy

STATE OF FLORIDA)
COUNTY OF _____)

Pursuant to the provisions of Section 215.26, or Section _____, Florida Statutes, I hereby apply for a refund and request that a State warrant be drawn in favor of:

NAME: Mr. T. Frank Lee, General Manager, Seminole Kraft Corporation

ADDRESS: 9469 Eastport Road, Post Office Box 26998
Jacksonville, FL 32218

AMOUNT: \$900.00, Permit No.: AC 16-141794 (Smelt Dissolving Tank)

which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

Reason for Claim: Over payment for processing of permit.

Receipt No. 76193

CERTIFIED TRUE AND CORRECT this 17 day of May 19 88

(Signature)

Form to be completed if authority is other than Section 215.26, Florida Statutes.

(FOR AGENCY USE ONLY)

Agency recommends denial of above claim based on the following facts, including statutory authority for collection: _____

or

Agency recommends approval of above claim and submits the following information to substantiate such claim.

The amount recommended \$ _____.

The amount requested above was originally deposited into the State Treasury, included in the State Treasurer's Receipt # _____, dated _____.

General Revenue _____
(Revenue Code)

Trust _____
(Name and Code Number of Trust Account)

Statutory Authority for Collection _____

It is requested that payment be made from:

Refund of Overpayment of Taxes - General Revenue-Refunds (1-441-0211)

Trust _____
(Name and Code Number of Trust Account)

CERTIFIED TRUE AND CORRECT this _____ day of _____ 19 _____

(Agency)

R. Bruce Mitchell
(Signature of Authorized Person)

Engineer IV
(Title)

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE REFUND IS PAID. SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted to mean three years from the date of payment into the State Treasury.

APPLICATION FOR REFUND
FROM
STATE OF FLORIDA

Best Available Copy

STATE OF FLORIDA)
COUNTY OF _____)

Pursuant to the provisions of Section 215.26, or Section _____, Florida Statutes, I hereby apply for a refund and request that a State warrant be shown in favor of:

NAME: Mr. T. Frank Lee, General Manager, Seminole Kraft Corporation

ADDRESS: 9469 Eastport Road, Post Office Box 26998
Jacksonville, FL 32218

AMOUNT: \$900.00, Permit No.: AC 16-141795 (Smelt Dissolving Tank)

Which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

Reason for Claim: Over payment for processing of permit.

Receipt No. 76193

CERTIFIED TRUE AND CORRECT this 17 day of May 19 88

(Signature)

Form to be completed if authority is other than Section 215.26, Florida Statutes.

(FOR AGENCY USE ONLY)

Agency recommends denial of above claim based on the following facts, including statutory authority for collection: _____

or

Agency recommends approval of above claim and submits the following information to substantiate such claim.

The amount recommended \$ _____.

The amount requested above was originally deposited into the State Treasury, include the State Treasurer's Receipt # _____, dated _____.

General Revenue _____
(Revenue Code)

Trust _____
(Name and Code Number of Trust Account)

Statutory Authority for Collection _____

It is requested that payment be made from:

Refund of Overpayment of Taxes - General Revenue-Refunds (1-441-0211)

Trust _____
(Name and Code Number of Trust Account)

CERTIFIED TRUE AND CORRECT this _____ day of _____ 19 _____

(Agency)
R. Bruce Mitchell
(Signature of Authorized Person)
Engineer III
(Title)

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE DATE SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted as meaning three years from the date of payment into the State Treasury.

APPLICATION FOR REFUND
FROM
STATE OF FLORIDA

Best Available Copy

STATE OF FLORIDA)
COUNTY OF _____)

Pursuant to the provisions of Section 215.26, or Section _____, Florida Statutes, I hereby apply for a refund and request that a State warrant be drawn in favor of:

NAME: Mr. T. Frank Lee, General Manager, Seminole Kraft Corporation
ADDRESS: 9469 Eastport Road, Post Office Box 26998
Jacksonville, FL 32218
AMOUNT: \$900.00, Permit No.: AC 16-141796 (Smelt Dissolving Tank)

which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

Reason for Claim: Over payment for processing of permit.

Receipt No. 76193

CERTIFIED TRUE AND CORRECT this 17 day of May 19 88

(Signature)

This form should be completed if authority is other than Section 215.26, Florida Statutes.

(FOR AGENCY USE ONLY)

Agency recommends denial of above claim based on the following facts, including statutory authority for collection: _____

or

Agency recommends approval of above claim and submits the following information to substantiate such claim.

The amount recommended \$ _____.

The amount requested above was originally deposited into the State Treasury, included in the State Treasurer's Receipt # _____, dated _____.

General Revenue _____
(Revenue Code)

Trust _____
(Name and Code Number of Trust Account)

Statutory Authority for Collection _____

It is requested that payment be made from:

Refund of Overpayment of Taxes - General Revenue-Refunds (1-441-0211)

Trust _____
(Name and Code Number of Trust Account)

CERTIFIED TRUE AND CORRECT this _____ day of _____ 19 _____

(Agency)
R. Bruce Mitchell
(Signature of Authorized Person)
Engineer IV
(Title)

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE REFUND IS PAID. SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted to mean three years from the date of payment into the State Treasury.

Best Available Copy

APPLICATION FOR REFUND
FROM
STATE OF FLORIDA

STATE OF FLORIDA)
COUNTY OF _____)

Pursuant to the provisions of Section 215.26, or Section _____, Florida Statutes, I hereby apply for a refund and request that a State warrant be drawn in favor of:

NAME: Mr. T. Frank Lee, General Manager, Seminole Kraft Corporation

ADDRESS: 9469 Eastport Road, Post Office Box 26998
Jacksonville, FL 32218

AMOUNT: \$900.00, Permit No.: AC 16-141798 (Nos. 1 & 2 Batch Digester System)

Which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

Reason for Claim: Over payment for processing of permit.

Receipt No. 76193

CERTIFIED TRUE AND CORRECT this 17 day of May 19 88

(Signature)

Form to be completed if authority is other than Section 215.26, Florida Statutes.

(FOR AGENCY USE ONLY)

Agency recommends denial of above claim based on the following facts, including statutory authority for collection: _____

or

Agency recommends approval of above claim and submits the following information to substantiate such claim.

The amount recommended \$ _____.

The amount requested above was originally deposited into the State Treasury, included in the State Treasurer's Receipt # _____, dated _____.

General Revenue _____
(Revenue Code)

Trust _____
(Name and Code Number of Trust Account)

Statutory Authority for Collection _____

It is requested that payment be made from:

Refund of Overpayment of Taxes - General Revenue-Refunds (1-441-0211)

Trust _____
(Name and Code Number of Trust Account)

CERTIFIED TRUE AND CORRECT this _____ day of _____ 19 _____

(Agency)

R. Bruce Mitchell
(Signature of Authorized Person)

Engineer II
(Title)

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE REFUND IS PAID. SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted to mean three years from the date of payment into the State Treasury.

Best Available Copy
APPLICATION FOR REFUND
FROM
STATE OF FLORIDA

STATE OF FLORIDA)
COUNTY OF _____)

Pursuant to the provisions of Section 215.26, or Section _____, Florida Statutes, I hereby apply for a refund and request that a State warrant be drawn in favor of:

NAME: Mr. T. Frank Lee, General Manager, Seminole Kraft Corporation
ADDRESS: 9469 Eastport Road, Post Office Box 26998
Jacksonville, FL 32218
AMOUNT: \$900.00, Permit No.: AC 16-141799 ((No. 1 MEE System)

which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

Reason for Claim: Over payment for processing of permit.

Receipt No. 76193

CERTIFIED TRUE AND CORRECT this 17 day of May 19 88

(Signature)

This form should be completed if authority is other than Section 215.26, Florida Statutes.

(FOR AGENCY USE ONLY)

Agency recommends denial of above claim based on the following facts, including statutory authority for collection: _____

or

Agency recommends approval of above claim and submits the following information to substantiate such claim.

The amount recommended \$ _____

The amount requested above was originally deposited into the State Treasury, included in the State Treasurer's Receipt # _____, dated _____

General Revenue _____
(Revenue Code)

Trust _____
(Name and Code Number of Trust Account)

Statutory Authority for Collection _____

It is requested that payment be made from:

Refund of Overpayment of Taxes - General Revenue-Refunds (1-441-0211)

Trust _____
(Name and Code Number of Trust Account)

CERTIFIED TRUE AND CORRECT this _____ day of _____ 19 _____

(Agency)
R Bruce Mitchell
(Signature of Authorized Person)
Engineer IV
(Title)

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE REFUND IS PAID. SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted to mean three years from the date of payment into the State Treasury.

APPLICATION FOR REFUND
FROM
STATE OF FLORIDA

Best Available Copy

STATE OF FLORIDA)
COUNTY OF _____)

Pursuant to the provisions of Section 215.26, or Section _____, Florida Statutes, I hereby apply for a refund and request that a State warrant be drawn in favor of:

NAME: Mr. T. Frank Lee, General Manager, Seminole Kraft Corporation

ADDRESS: 9469 Eastport Road, Post Office Box 26998

Jacksonville, FL 32218

AMOUNT: \$900.00, Permit No.: AC 16-141800 (No. 2 MEE System)

which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

Reason for Claim: Over payment for processing of permit.

Receipt No. 76193

CERTIFIED TRUE AND CORRECT this 17 day of May 19 88

(Signature)

to be completed if authority is other than Section 215.26, Florida Statutes.

(FOR AGENCY USE ONLY)

Agency recommends denial of above claim based on the following facts, including statutory authority for collection: _____

or

Agency recommends approval of above claim and submits the following information to substantiate such claim.

The amount recommended \$ _____.

The amount requested above was originally deposited into the State Treasury, included in the State Treasurer's Receipt # _____, dated _____.

General Revenue _____
(Revenue Code)

Trust _____
(Name and Code Number of Trust Account)

Statutory Authority for Collection _____

It is requested that payment be made from:

Refund of Overpayment of Taxes - General Revenue-Refunds (1-441-0211)

Trust _____
(Name and Code Number of Trust Account)

CERTIFIED TRUE AND CORRECT this _____ day of _____ 19 _____

(Agency)

R Bruce Mitchell

(Signature of Authorized Person)

Engineer III

(Title)

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE DATE SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted to mean three years from the date of payment into the State Treasury.

APPLICATION FOR REFUND
FROM
STATE OF FLORIDA

Best Available Copy

STATE OF FLORIDA)
COUNTY OF _____)

Pursuant to the provisions of Section 215.26, or Section _____, Florida Statutes, I hereby apply for a refund and request that a State warrant be drawn in favor of:

NAME: Mr. T. Frank Lee, General Manager, Seminole Kraft Corporation

ADDRESS: 9469 Eastport Road, Post Office Box 26998
Jacksonville, FL 32218

AMOUNT: \$900.00, Permit No.: AC 16-141801 (No. 3 MEE System)

which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

Reason for Claim: Over payment for processing of permit.

Receipt No. 76193

CERTIFIED TRUE AND CORRECT this 17 day of May 19 88

(Signature)

Not to be completed if authority is other than Section 215.26, Florida Statutes.

(FOR AGENCY USE ONLY)

Agency recommends denial of above claim based on the following facts, including statutory authority for collection: _____

or

Agency recommends approval of above claim and submits the following information to substantiate such claim.

The amount recommended \$ _____.

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General Revenue _____
(Revenue Code)

Trust _____
(Name and Code Number of Trust Account)

Statutory Authority for Collection _____

It is requested that payment be made from:

Refund of Overpayment of Taxes - General Revenue-Refunds (1-441-0211)

Trust _____
(Name and Code Number of Trust Account)

CERTIFIED TRUE AND CORRECT this _____ day of _____ 19 _____

(Agency)

R. Bruce [Signature]

(Signature of Authorized Person)

Engineer III

(Title)

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE DATE SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted to mean three years from the date of payment into the State Treasury.

Department of Environmental Regulation

Daily Cash Listing **Best Available Copy**

Date November 12, 1987

Cost Center 300402

Date Bureau of Actg. & Budgeting Received _____

Lister's Signature Voggie Jauer

Signature of Receiver _____

REMITTED BY	CHECK NUMBER	AMOUNT	RECEIPT NUMBER	REVENUE CODE	FILE NUMBER
Seminole Kraft Corp.	9389	\$1,000.00	76193	001031	AC 16-141794
	9390	1,000.00	76193	001031	16-141795
	9391	1,000.00	76193	001031	16-141796
	9392	1,000.00	76193	001031	16-141798
	9393	1,000.00	76193	001031	16-141799
	9394	1,000.00	76193	001031	16-141800
	9395	1,000.00	76193	001031	16-141801
	9396	1,000.00	76193	001031	16-141790
	9397	1,000.00	76193	001031	16-141792
	9398	1,000.00	76193	001031	16-141793

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No. **76193**

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Seminole Kraft Corp. Date Nov. 12, 1987

Address 9469 Eastport Rd., P.O. Box 26998 Dollars \$ 10,000.00
Jacksonville, FL 32218-0998

Applicant Name & Address T. Frank Lee, Address same as above.

Source of Revenue ✓ # 9389 through ✓ # 9398

Revenue Code 001031 Application Number AC16-141790, 792, 793, 794
795, 796, 798, 799, 800, 801

By _____

TOTAL -

2-15-88

AC 16-141794

Smelt Dissolving Tanks

141795

141796

794

795

796

✓ # 9389

✓ # 9390

✓ # 9391

R# 76193

R# 76193

R# 76193

pd. \$1000.00

pd. \$1000.00

pd. \$1000.00

ref. \$900.00

ref. \$900.00

ref. 900.00

Maggie - Seminole Kraft Corps.

Thanks,
Burr

RECEIVED

RECEIVED

FEB 22 1988

DER-BAQM

RECEIVED

FEB 22 1988

DER-BAQM

RECEIVED

FEB 22 1988

DER-BAQM

RECEIVED

FEB 22 1988

DER-BAQM

Seminole Kraft Corporation

Refunds Due

		Paid	Due	R. #
No. 1 Lime Kiln	AC 16-141790	1000.00	900.00	76193
No. 2 "	141792	1000.00	900.00	76193
No. 3 "	141793	1000.00	900.00	76193
No. 1 + 2 Batch Digester Sys.	141798	1000.00	900.00	76193
No. 1 MEE Sys.	141799	1000.00	900.00	76193
No. 2 "	141800	1000.00	900.00	76193
No. 3 "	141801	1000.00	<u>900.00</u>	76193
			#6300.00	

Maggie,

Flambo,

Bum

3-23-88



Seminole Kraft Corporation

RECEIVED

MAY 12 1988

DER-BAQM

Jacksonville Mill

9469 Eastport Road

P.O. Box 26998

Jacksonville, Florida 32218-0998

May 11, 1988

904 751-6400

Mr. C.H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Florida Dept. of Environmental Regulations
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

This letter is to certify that Seminole Kraft Corporation has started construction to bring the No.1 and No.2 Batch Digester Systems (construction Permit No. AC 16-141798) into final compliance with the TRS Rule (17-2.600(4)(c)1.a.) per the compliance schedule provided in our October 16, 1987 letter.

As reported earlier, TRS gasses from the No.1 and No.2 Batch Digester Systems have been collected and incinerated in the No.2 or No.3 Lime Kiln since 1975. However, the process control system in the Digester System requires upgrading to assure continuous compliance with the TRS Rule. Accordingly, the construction permit, only recently issued by the Department, provides for upgrading the induced draft fan and duct work and installing a computer system to sequence and control all aspects of digester operation including the NCG System.

Seminole Kraft has ordered much of the equipment required for this installation and will order the remainder in the next few weeks. As noted above, construction has begun with work on the extensive wiring system which will be required to allow the computer to sequence and control the digester operation. We should have no problem completing construction by the November 12, 1988 deadline.

Please let me know if you have any questions.

Sincerely,

T. Frank Lee
General Manager

ah

- CC: James Manning - BESD
- Ernest Frey - FDER
- Bill Thomas - FDER
- Malcolm Williams
- Mike Riddle
- John Millican
- Terry Cole

Copied: Bruce Mitchell } 5.13.88
CHFBT

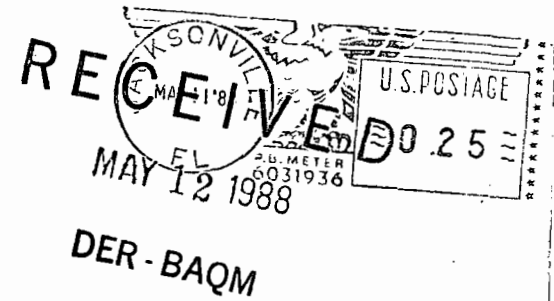
PM
May 11, 1988
Jacksonville, FL

file copy



Seminole Kraft Corporation

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



DER-BAQM

Mr. C.H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Florida Dept. of Environmental Regulations
2600 Blair Stone Road
Tallahassee, FL 32399-2400





Seminole Kraft Corporation

Jacksonville Mill

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

RECEIVED

MAY 10 1988

May 4, 1988

904 751-6400

DER-BAQM

Mr. Ernest E. Frey, District Manager
Florida Department of Environmental Regulation
3426 Bills Road
Jacksonville, FL 32207

Mr. James Manning, Deputy Director
Department of Health, Welfare and
Bio-Environmental Services
421 West Church Street
Jacksonville, FL 32206-4397

Dear Messrs. Frey and Manning:

This is to notify Florida DER and BESD that Seminole Kraft Corporation has completed the installation of and started up the new scrubbers on the Smelt Dissolving Tanks (Permit Nos. AC-16-141794, -141795 and -141796) in accordance with the Consent Order. Construction permits were finally issued by DER on April 4, 1988 and preparation for installation of these new scrubbers began immediately so that we could install them during a planned mill outage (April 19-25, 1988). Unfortunately, Florida DER's delay in issuing these construction permits for the Smelt Tank Scrubbers left little time for construction startup and testing prior to the Consent Order deadline of May 12, 1988.

Construction began on April 19, 1988 on the No.3 Smelt Dissolving Tank Scrubber and was completed on April 22, 1988. Construction began April 23, 1988 on the No.2 Smelt Dissolving Tank Scrubber and was completed on April 25, 1988. Construction began on April 26, 1988 on the No.1 Smelt Dissolving Tank Scrubber and was completed on April 29, 1988. The mill began start up on April 26, 1988 and by April 30, 1988 the mill was almost completely back on line. Compliance testing for the smelt tank scrubbers was scheduled for May 3-5, 1988.

On April 30, 1988 the mill suffered a massive power outage caused by an explosion of an AK Breaker (used for distribution of JEA power) and associated damage to the mill generated power distribution system. This forced us to cancel the compliance test scheduled for May 3-5, 1988. On Monday, May 1, 1988, we were able to restore partial power to the mill and managed to bring a portion of our mill back on-line. However, the mill had to be

Messrs. Frey and Manning
May 4, 1988
Page 2

completely shut down again on Tuesday, May 3, 1988 to install a replacement AK Breaker so that we could supply full power and operate the entire mill. When we attempted to start up on Wednesday, May 4, 1988, a tube blew in the No.2 Recovery Boiler. This boiler was immediately shut down and repairs are underway. The No.2 Recovery Boiler will be down for tube repair for about 6 days and should start up on Wednesday, May 11, 1988.

Accordingly, we now plan to conduct compliance tests on the Smelt Dissolving Tanks May 10-12, 1988. As you can note, this very tight schedule, if it holds, will still allow us to run the test demonstrating compliance with Consent Order by May 12, 1988. To do this, we have had to engage a testing firm (ATC) from Auburn, Alabama because our normal testing firm (TSI) who had been scheduled to conduct this testing originally on May 3-5, has another commitment scheduled for the May 10-12 period. This will double the cost of this testing, but we believe this is appropriate in an effort to still meet the Consent Order deadline and avoiding requesting an extension under paragraph 39 of the Consent Order.

We believe the explosion and recovery boiler tube failure constitute a force majeure event under the Consent Order. However, as detailed above, we are making every effort and sparing no expense to avoid requesting an extension to the compliance date in the Consent Order.

Should further events dictate any further changes to this schedule we will notify Florida DER and BESD immediately. Please let us know if you have any questions.

Sincerely,



T. Frank Lee
General Manager

ah

CC: Steve Smallwood
John Brown
Wayne Tutt

MAY 4 '88 12:47 ATLANTA T-E

PAGE.02 Main FileHand Delivered

AC16-141798

Sumner Kraft

RECEIVED

MAY 05 1988

DER-BAQM

DIGESTER SYSTEM TRS PERMIT**Proposed Section 2 Condition**

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

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

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

TERRY COLE
ATTORNEY AT LAW

OERTEL & HOFFMAN, P. A.
TELEPHONE (904) 877-0099

SUITE C
2700 BLAIR STONE ROAD
POST OFFICE BOX 6507
TALLAHASSEE, FLORIDA 32314

~~11~~

Return to M&J.

of bank

R-
-

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

Basis

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

Calculations

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

$$= 118 \text{ TPH}$$

Use - 120 Tons per hour, Air Dry Pulp

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

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP		ACTION NO
		ACTION DUE DATE
1. TO: (NAME, OFFICE, LOCATION)		Initial
George Sweetwood		Date
2.	Chair	Initial
3.	Bruce 6/17	Date
4.		Initial
		Date
REMARKS: for file, or discard if extra <div style="text-align: right; margin-top: 20px;"><i>clm</i></div>		INFORMATION <input type="checkbox"/> Review & Return <input type="checkbox"/> Review & File <input type="checkbox"/> Initial & Forward DISPOSITION <input type="checkbox"/> Review & Respond <input type="checkbox"/> Prepare Response <input type="checkbox"/> For My Signature <input type="checkbox"/> For Your Signature <input type="checkbox"/> Let's Discuss <input type="checkbox"/> Set Up Meeting <input type="checkbox"/> Investigate & Report <input type="checkbox"/> Initial & Forward <input type="checkbox"/> Distribute <input type="checkbox"/> Concurrence <input type="checkbox"/> For Processing <input type="checkbox"/> Initial & Return
<div style="font-size: 2em; font-weight: bold; margin-bottom: 10px;">RECEIVED</div> <div style="font-size: 1.2em; margin-bottom: 10px;">MAY 05 1988</div>		DATE 5-5-88 PHONE 8-1344
FROM: CHF		



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: <u>KIM / LETTERS</u>	Location: _____
To: <u>BM / SKC / MEMO</u>	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Main Files: AC 16-141798, -141799, -141800, and -141801

THRU: Bill Thomas
Pradeep Raval
Betsy Pittman

FROM: Bruce Mitchell *BM*

DATE: April 26, 1988

SUBJ: Comments on the April 14, 1988 Meeting at the BAQM and Terry Cole's letters dated April 14, 1988

A meeting with representatives of Seminole Kraft Corporation (SKC) was held at the Bureau on April 14, 1988 (see attendee list), to receive comments on the Technical Evaluation and Preliminary Determination and draft construction permits (7). It appeared that all of SKC's concerns with the permits were resolved until the receipt of Mr. Cole's letters, which attempted to restate what was agreed to by SKC and the Bureau at the meeting. Mr. Terry Cole was not present at the meeting. The Bureau does not agree with the language contained in the letters, as we do not feel it reflects the terms agreed to. The Bureau would, in response, offer the following language:

1. AC 16-141798:
Specific Condition No. 2:

The maximum production rate of the Nos. 1 and 2 batch digester systems will be _____ tons per hour of air dried pulp and based on a nominal utilization rate of _____ lbs/hr of wood chips and _____ lbs/hr of white/black liquor. For PSD purposes, the maximum production rate will be 1987 TPD ADP.

The above Specific Condition is as edited in the text that I used to make corrections on at the meeting. Mr. Cole forwarded a letter on April 13, 1988, following a meeting with John Millican and Jerry Cox (Jefferson Smurfit Corporation (JSC)) on JSC's batch digester system, concurring with the specific language that was to be placed in JSC's construction permit.

When Mr. Millcan first offered language for the Specific Condition, I pointed out that it did not contain the two-phased approach that was agreed to for JSC, namely the hourly maximum

Main Files
Page Two
April 26, 1988

production rate, for operation and testing purposes, and the daily maximum production rate, for PSD review purposes. Consequently, that is why there are blanks in the stated condition, which was to be submitted by Mr. Barton. I offered to go and retrieve the JSC's batch digester system construction permit to provide the exact language that Mr. Millican and Mr. Jerry Cox had agreed to, but Mr. Millican, due to his familiarity, began writing and stating the condition, which I helped edit during the process and also made the edits on my working document/text. The Bureau was surprised with the wording received, since this issue has been thoroughly discussed in numerous meetings, two of which were with Mr. Howard Rhodes.

It was pointed out that the hourly maximum production rate/capacity is to reflect the rate that has been documented and achieved through past operation. The maximum hourly capacity was to have been established for the interim operating permits (see FAC Rule 17-2.960(1)(a)). The Bureau used Mr. T. Frank Lee's letter and attachments to Mr. Steve Smallwood, dated November 10, 1987, to establish the maximum production rates/capacities for the sources and these numbers were used in the draft construction permits. Mr. Barton said that he would submit numbers for the first part of the Specific Condition. There was no justification of the production rate/capacity submitted with either of Mr. Cole's letters.

For compliance testing, Mr. Barton said that it would be difficult to operate the entire mill at its maximum capacity. It was pointed out to him by Ms. Betsy Pittman and Mr. Bill Thomas that just those sources, for which compliance is being demonstrated (i.e., the Nos. 1 and 2 batch digester systems and Nos. 1-3 MEE systems), would have to be operated in the 90-100% range of their maximum production rate/capacity, unless SKC wants these sources to be permitted at a lower production rate/capacity. This is in agreement with Mr. C. H. Fancy's letter of April 19, 1988, to Mr. Winston Smith with Region IV, U.S. EPA, and Mr. Terry Cole's letter dated November 5, 1987. Consequently, the language proposed for the second part of the Specific Condition is not acceptable.

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

Since the MEE systems are a continuous feed process, the maximum hourly production rate/capacity of each system should be a direct reflection of the daily production rate/capacity of each system. Therefore, for operation, testing, and PSD purposes, the numbers

Main Files
Page Three
April 26, 1988

are as reflected in Mr. Lee's letter and attachments, since Mr. Barton did not change any of the numbers related to the maximum processing rates/capacities.

The Bureau did not and will not agree with the proposed language for Specific Condition No. 2 in the above referenced construction permits. Since compliance tests are to be conducted with the source(s) operating at 90-100% of its maximum capacity, it is redundant to state "For operation and testing and PSD purposes" because of the obvious, that the only reference necessary is the maximum hourly production rate/capacity.

Again, the Nos. 1-3 MEE systems will have to be operated in the 90-100% range of their maximum hourly production rate/capacity for the compliance test to be acceptable, unless SKC wants the sources to be permitted at a lower production rate/capacity.

BM/ks



Seminole Kraft Corporation

PM
18 April 1988
Jacksonville, FL
Jacksonville Mill

file copy

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

April 15, 1988

904 751-6400

RECEIVED

APR 19 1988

DER-BAQM

Mr. Bill Thomas
Department of Environmental Regulation
Bureau of Air Quality
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Publication of Notice of Intent: TRS Rule
Construction Permit

Dear Mr. Thomas:

Enclosed is the certificate of publication for your Notice of Intent to Issue, our TRS construction permits for the lime kilns, digesters and evaporators.

If you need any more information please contact Mr. Michael Riddle at (904) 751-6400 extension 279.

Sincerely,

T. Frank Lee
General Manager

ah

CC: Malcolm Williams
Ken Johnson
Tom Caradine
Charles Stewart
Curt Barton (Atlanta T&E)

The Florida Times-Union



Jacksonville Journal

FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared Bill Champion

who on oath says that he is

Retail Advertising Supervisor of The Florida Times-Union, and

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

Florida; that the attached copy of advertisement, being a

Legal Notice

in the matter of Notice of Intent

in the Court,

was published in The Jacksonville Journal

in the issues of April 13, 1988

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

Sworn to and subscribed before me this 13th day of

April A.D. 19 88

[Signature]

Notary Public
State of Florida at Large

My Commission Expires

DA 444

NOTARY PUBLIC STATE OF FLORIDA
My commission expires Feb. 19, 1989

[Signature: Bill Champion]

Copied: Bruce Mitchell, Pradup Reval, Bill Stewart, Khurshid Mehta } 4-21-88

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Seminole Kraft Corporation (SKC), to make several changes at its existing facility in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2, which includes replacement of some existing equipment, addition of some existing and new equipment, and upgrading the existing noncondensable gas (NCG) handling system from various sources. The TRS NCG gases will be incinerated in either the No. 2 or 3 Lime Kiln. The location of the proposed project will be at SKC's existing facility in Jacksonville, Duval County, Florida. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The applications are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Dept. of Environmental Regulation
Northeast District Office
3426 Bills Road
Jacksonville, Florida 32207
Duval County Department of Health,
Welfare and Bio-Environmental Services
421 West Church Street
Suite 412
Jacksonville, Florida 32202

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

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APR 19 1988

DER-BAQM

Permits

AC 16-141790
141792
141793
141798
141799
141800
141801

WEB-BV009
APR 18 1988
RELEASE

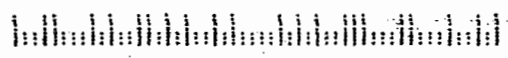


Seminole Kraft Corporation

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



Mr. Bill Thomas
Department of Environmental Regulation
Bureau of Air Quality
2600 Blair Stone Road
Tallahassee, FL 32399-2400



file copy

LAW OFFICES
OERTEL & HOFFMAN
A PROFESSIONAL ASSOCIATION

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

SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301
TELEPHONE (904) 877-0099
MAILING ADDRESS:
POST OFFICE BOX 6507
TALLAHASSEE, FLORIDA 32314-6507

April 18, 1988

BY HAND DELIVERY

RECEIVED

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

APR 19 1988

DER-BAQM

Dear Mr. Thomas:

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

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

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

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

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

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

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

Handwritten notes in the top right corner, including a date and some illegible text.

LAW OFFICES

OERTEL & HOFFMAN

A PROFESSIONAL ASSOCIATION

POST OFFICE BOX 6507

TALLAHASSEE, FLORIDA 32314-6507

BY HAND DELIVERY

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

Vertical stamp or text on the right side of the envelope, possibly indicating a date or time.

Handwritten notes in the bottom right corner, including a date and some illegible text.

- a. EPA method 5, determination of particulate emissions from stationary sources.
- b. EPA method 9, visual determination of the opacity of the emissions from stationary sources.
- c. EPA method 16 or 16A, determination of TRS emissions from stationary sources.

Specific Condition 11 - Amend to Read:

The No. 1 lime kiln shall be tested one time only for SO₂ emissions to establish the level of SO₂ for PSD tracking purposes.

Specific Condition 13 - Retain the first sentence as written. Delete the remainder and add:

The permittee may continue to operate in compliance with all terms of the construction permits as provided in F.A.C. Rules 17-2 and 17-4.

Retain the last paragraph under Specific Condition 13.

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

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

Specific Condition 3 - Amend to Read:

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

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

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

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

Specific Condition 6 - Amend to Read:

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

- a. EPA method 5, determination of particulate emissions from stationary sources.
- b. EPA method 9, visual determination of the opacity of emissions from stationary sources.
- c. EPA method 16 or 16-a, determination of TRS emissions from stationary sources.

Specific Condition 13 - Amend to Read:

The Nos. 2 and 3 lime kilns shall be tested one time only for SO₂ emissions for PSD tracking purposes. The results also will be used to assess the appropriate fee pursuant to F.A.C. Rule 17-4, of which \$1,000.00 (more than 100 TPY potential pollution emissions) has already been received.

Specific Condition 15 - Retain the first sentence as written. Delete the remainder and add:

The permittee may continue to operate in compliance with all terms of the construction permit as provided in F.A.C. Rule 17-2 and 17-4.

Mr. William A. Thomas, P.E. III.
April 18, 1988
Page 4

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

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

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

Specific Condition 3 - Amended to Read:

The Nos. 1 and 2 batch digester systems are subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (F.A.C.), Rule 17-2.600(4)(c)1a which requires combustion of the TRS gasses in the Nos. 2 or 3 lime kiln, from which the exhaust gasses shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12 hour average, in accordance with F.A.C. Rule 17-2.600(4)(c)5.

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

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

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

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

Mr. William A. Thomas, P.E. III
April 18, 1988
Page 5

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

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

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

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

The Nos. 2 and 3 multiple effect evaporators are subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (F.A.C.) Rule 17-2.600(4)(c)1a, which requires combustion of the TRS gasses in the No. 2 or 3 lime kiln, from which the exhaust gasses shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12 hour average in accordance with F.A.C. Rule 17-2.600(4)(c)(5).

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

"and 40 CFR 60, Appendix A".

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

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

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

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

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

Sincerely,

Terry Cole
Terry Cole

TC:slt
1003.014

Copied: CHF/BT
Bruce Mitchell } 4.19.88
Pradeep Rawal }
Khushal Mehta, BOSO }

file copy

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OERTEL & HOFFMAN

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KENNETH F. HOFFMAN
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WILLIAM E. POWERS, JR.

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

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

April 14, 1988
Revised April 15, 1988

BY HAND DELIVERY

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

Dear Mr. Thomas:

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

The specific permits are:

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

RECEIVED

APR 15 1988

DER-BAQM

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

- 2A. For PSD purposes the maximum production rate of the Nos. 1 and 2 batch digester systems will be 1987 TPD ADP (tons per day of air dried pulp based on a nominal utilization rate of 580,000 lbs/hr wood chips (dry) and 898,000 lbs/hr of black/white liquor).
- B. For testing purposes the maximum production rate of the Nos. 1 and 2 batch digester systems will be 120 TPH ADP (tons per hour of air dried pulp). Tests for compliance will be performed with the control device (No. 2 or 3 lime

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 11-19-01 BY 60322/UC/STP

LAW OFFICES

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POST OFFICE BOX 6507

TALLAHASSEE, FLORIDA 32314-6507

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

OERTEL & HOFFMAN

ALL INFORMATION CONTAINED
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DATE 11-19-01 BY 60322/UC/STP

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

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

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

AC 16-141799 - Number 1 MEE

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

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

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

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

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

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

Sincerely,


for Terry Cole

TC:slt
1003.010

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

Copies: Bruce Mitchell
Pradeep Raval
CHFIBT
Khushee Nukta, BESO } 4-19-88

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April 14, 1988

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APR 15 1988

DER-BAQM

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

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- AC 16-141800 - #2 MEE's
- AC 16-141801 - #3 MEE's

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

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OERTEL & HOFFMAN

A PROFESSIONAL ASSOCIATION

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TALLAHASSEE, FLORIDA 32314-6507

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

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APR 14 1984
U.S. DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY MANAGEMENT BUREAU
TALLAHASSEE, FLORIDA 32399-2400

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

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

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

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

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

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

Sincerely,


Terry Cole

TC:slt
1003.010

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

Copied: Bruce Mitchell
Randeep Bawal
CFFBT
Khushid Mehla, B=SD } 4.19.88

Attendees

Meeting @ BAQM

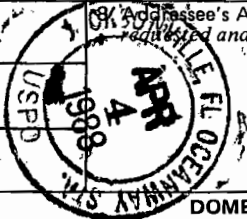
April 14, 1988

1. Bill Thomas DER/BAQM/CAP (904) 488-1344
2. Bruce Mitchell " "
3. Pradeep Raval " "
4. Carl Barton Seminale 404 621 6707
5. JOHN MILLICAN ENV. SERVICES 904/584 - 5137
6. ~~DEBRA PATMAN DER 904/488 9730~~
- 7.

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 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 additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery.

3. Article Addressed to: T. Frank Lee Seminole Kraft Corporation 9469 Eastport Road Jacksonville, FL 32218		4. Article Number P 274 010 361	
		Type of Service: <input type="checkbox"/> Registered <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.			
5. Signature — Addressee X		6. Addressee's Address (ONLY if registered and fee paid)	
6. Signature — Agent X <i>Edman</i>			
7. Date of Delivery <i>6/14</i>			

PS Form 3811, Feb. 1986

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* U.S.G.P.O. 1985-480-794

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Seminole Kraft Corp. 9469 Eastport Road O. State and ZIP Code Jacksonville, FL 32218	
Postage	5
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom Date, and Address of Delivery	
TOTAL Postage and Fees	5
Postmark or Date AC 16-141790, 92, 93, 98, 99, 800, 801	

PS Form 3800, June 1985

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

March 31, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Lee:

Attached is a revised second page of the Notice of Intent, which is to be placed in the paper of local circulation. The designation of Duval County's BESD office and its address was inadvertently left off the original issue. Please replace the original second page with this one. I apologize for the mistake.

If there are any questions, please give me a call at (904)488-1344.

Sincerely,

R. Bruce Mitchell
Bureau of Air Quality
Management

RBM/bm

Attachment

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

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

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation
Northeast District Office
3426 Bills Road
Jacksonville, Florida 32207

Duval County Department of Health,
Welfare and Bio-Environmental Services
421 West Church Street
Suite 412
Jacksonville, Florida 32202

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

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 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 additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery.

3. Article Addressed to: Mr. T. Frank Lee, General Manager Seminole Kraft Corporation P.O. Box 26998 Jacksonville, FL 32218	4. Article Number P 274 010 359
	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail
5. Signature — Addressee X	7. Always obtain signature of addressee or agent and DATE DELIVERED.
6. Signature — Agent X <i>Et. Emma</i>	8. Addressee's Address (ONLY if requested and fee paid)
7. Date of Delivery	

PS Form 3811, Feb. 1986

DOMESTIC RETURN RECEIPT

P 274 010 359

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

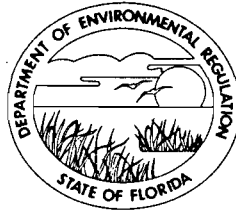
* U.S.G.P.O. 1985-480-794

Mail to T. Frank Lee, Gen. Mgr. Seminole Kraft Corporation Street and No. P.O. Box 26998	
P.O., State and ZIP Code Jacksonville, FL 32218	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 03-31-88 AC 16-141790,-792,-793,-798, -799,-800,-801	

PS Form 3800, June 1985

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

March 31, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Lee:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permits for Seminole Kraft Corporation to make several changes at the existing mill in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2. The changes include replacement of some existing equipment, addition of some existing and new equipment, and upgrading the existing noncondensable gas (NCG) handling system. The NCG will be incinerated in either the No. 2 or 3 Lime Kiln.

Please submit, in writing, any comments which you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

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

CHF/bm

Attachments

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

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Applications for Permits by:

Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

DER File No. AC 16-141790
AC 16-141792
AC 16-141793
AC 16-141798
AC 16-141799
AC 16-141800
AC 16-141801

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue 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 (SKC), applied on November 12, 1987, to the Department of Environmental Regulation for permits to make several changes at its existing facility in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code (FAC) Rule 17-2, which includes replacement of some existing equipment, addition of some existing and new equipment, and upgrading the existing noncondensable gas (NCG) handling system from various sources. The TRS NCG gases will be incinerated in either the No. 2 or 3 Lime Kiln. The location of the proposed project will be at SKC's existing facility in Jacksonville, Duval County, Florida.

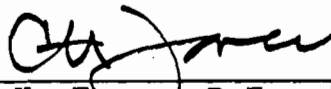
The Department has permitting jurisdiction under Chapter 403, Florida Statutes (F.S.), and FAC Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permits were needed for the proposed work.

Pursuant to Section 403.815, F.S. and FAC Rule 17-103.150, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit applications. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of the notice. 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 petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. 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, F.S. Petitions must comply with the requirement of FAC Rules 17-103.155 and 28-5.201 (copy enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. 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, concerning the subject permit applications. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

- B. Stewart, NE Dist.
- C. Barton, SCC
- J. McKinnon, P.E., SCC
- B. Pittman, Esq.

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

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 March 31, 1988.

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

Martha Wise March 31, 1988
Clerk Date

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Seminole Kraft Corporation (SKC), to make several changes at its existing facility in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2, which includes replacement of some existing equipment, addition of some existing and new equipment, and upgrading the existing noncondensable gas (NCG) handling system from various sources. The TRS NCG gases will be incinerated in either the No. 2 or 3 Lime Kiln. The location of the proposed project will be at SKC's existing facility in Jacksonville, Duval County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

Technical Evaluation
and
Preliminary Determination

Seminole Kraft Corporation
Duval County
Jacksonville, Florida

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

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

March 31, 1988

I. Application

A. Applicant

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

B. Project Description and Location

The applicant made application for construction permits and to make several changes at its existing mill in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code (FAC) Rule 17-2, which includes the replacement of some existing equipment, addition of some existing and new equipment, and upgrading the existing noncondensable gas (NCG) handling system. The NCG is capable of being incinerated in lime kilns Nos. 2 or 3. Specifically, the following changes are proposed:

- o For the No. 1 Lime Kiln, a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up will be installed. The filter will be from the existing No. 3 Lime Kiln and is 8 feet in diameter and 10 feet long.
- o For the Nos. 2 and 3 Lime Kilns, a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up will be installed. The new filters will be 10 feet in diameter and 14 feet long.
- o A computer control system will be installed in the pulp mill digester area to control and sequence the digester cooks and blows in the Nos. 1 and 2 Batch Digester Systems. This system will smooth out the flows of the NCG into the NCG system and will control the venting from the pressure relief valves on the blow tanks and blow heat accumulators.

The NCG system upgrade will consist of piping changes at the inlet of the induced draft fan to prevent condensate from entering the fan. The purpose is to improve fan reliability, eliminate condensate in the combustion air to the kiln(s), and improve combustion control.

- o For the Nos. 1-3 Multiple Effect Evaporator (MEE) Systems, a stainless steel sheet metal cover has been installed on each of the hotwells. Stack connections were made to the existing NCG handling system. This part of the project

was first connected as a trial run for feasibility and was successful.

The project will occur at the applicant's existing kraft pulp mill located in Duval County, Florida. The UTM coordinates are Zone 17, 744.18 km East and 3365.60 km North.

The Standard Industrial Codes are:

1. No. 2621 - Paper Mills

The Standard Classification Codes are:

1. Pulp and Paper Industry

Major Group 26: Sulfate (Kraft) Pulping

- o Batch Digester System 3-07-001-01 (tons ADUP)
- o MEE System 3-07-001-03 (tons ADUP)
- o Lime Kiln 3-07-001-06 (tons ADUP)

2. Mineral Products

Major Group 32: Lime Manufacture

- o Calcining-Rotary Lime Kiln 3-05-016-04 (tons prod.)

C. Process and Controls

The white/black liquor, or cooking liquor, is added to the wood chips in the digesters and cooked. At the end of the cooking cycle, the contents of the vessel(s) are blown to a tank at atmospheric pressure, flashing off steam and NCG. The NCG will be collected and transported to either the No. 2 or 3 Lime Kiln for incineration.

The spent liquor (black liquor) is then concentrated in the multiple effect evaporator system (Nos. 1-3). NCG emitted will be collected and transported to either the Nos. 2 or 3 Lime Kiln for incineration.

The spent lime cake (calcium carbonate) from the slaking cycle is recalcined in a rotary lime kiln (Nos. 1-3) to produce quicklime for recausticing the green liquor. The particulate matter (PM), TRS, and visible emissions will be controlled with a wet scrubber control system. Sulfur dioxide (SO₂) emissions from the oxidation of the TRS NCG should be scrubbed out in the lime mud and the wet scrubber control system. A one time compliance test will be required to verify and establish the SO₂ removal efficiency.

II. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and FAC Rules 17-2 and 17-4.

The application packages were deemed complete on January 26, 1988.

The existing mill is located in the area of Duval County that has been designated nonattainment for PM according to FAC Rule 17-2.410(2)(a)2.

The existing mill is a major emitting facility in accordance with FAC Rule 17-2.100(111) for the pollutants PM and SO₂.

Based on the applicant's response, the Nos. 1 and 2 Batch Digester Systems, the Nos. 1-3 MEE Systems, and the Nos. 1-3 Lime Kilns are existing non-NSPS (new source performance standards) sources.

As stated before, the batch digester systems and MEE systems are sources of TRS and the lime kilns are sources of PM, TRS and visible emissions. SO₂ emissions will be emitted unless the Nos. 2 and 3 Lime Kilns and their associated scrubber system have a removal efficiency of 100%. A one-time test for SO₂ will be required to establish the SO₂ removal efficiency of each lime kiln (Nos. 2 and 3). Also, a one-time test for SO₂ will be required on the No. 1 Lime Kiln, which uses sulfur laden fuel oil, to establish the SO₂ removal efficiency.

Since the mill is under a Consent Order, OGC Case No. 86-1405 (dated October 28, 1986), the Nos. 1-3 MEE Systems are required to be in final compliance by August 12, 1988, which is nine (9) months earlier than FAC Rule 17-2.960(1)(d)1. requires of existing MEEs. Currently, the Nos. 1-3 MEEs are already in compliance with the TRS regulations.

The Consent Order, OGC Case No. 86-1405, contains applicable conditions to the Nos. 1 and 2 Batch Digester Systems that apply to production and the NCG system (see #15).

The applicant requested a more restrictive PM mass emission limit for each lime kiln than what would be allowed pursuant to FAC Rule 17-2.610(1), because of issues associated with the PM nonattainment area (NAA) in Duval County and Duval County's Bio-Environmental Services Division (BESD).

The following table exhibits the projected potential pollutant emissions from the proposed project in tons per year:

Table 1

Source	Projected Potential Pollutant Emiss. (TPY)		
	PM	TRS	SO ₂
Nos. 1 & 2 Batch Digester Systems		0	
Nos. 1-3 MEEs		0	
Lime Kilns			
No. 1	70.1	8.15	0
No. 2	70.1	8.54	0
No. 3	70.1	9.02	0
Total:	210.3	25.71	

- Note: o Annual hours of operation are 8760
o Emissions for the Lime Kilns are based on:
1. PM: Process Weight (FAC Rule 17-2.650(2)(c)9.)
 - a. #1 - 11.09 tons/hr lime mud processed (dry)
 - b. #2 - 11.17 tons/hr lime mud processed (dry)
 - c. #3 - 11.17 tons/hr lime mud processed (dry)
 2. TRS: 20 ppmvd @ std. conditions @ 10% O₂, 12-hr avg.
(FAC Rule 17-2.600(4)(c)5.):
 - a. #1 - 29,100 acfm, 16,180 dscfm; 160°F, 35% H₂O;
9.0% O₂
 - b. #2 - 26,350 acfm; 16,321 dscfm; 150°F; 29% H₂O;
8.5% O₂
 - c. #3 - 22,275 acfm; 14,189 dscfm; 150°F; 26% H₂O;
6.0% O₂

Since the Nos. 1 and 2 Batch Digester Systems, the Nos. 1-3 MEE Systems and the Nos. 1-3 Lime Kilns, are not being modified, the emissions of TRS are not subject to review pursuant to FAC Rule 17-2.500, Prevention of Significant Deterioration (PSD), and the emissions of PM are not subject to review pursuant to FAC Rule 17-2.510, New Source Review for NAA. The emissions of SO₂ will be assumed to be zero and not subject to review pursuant to FAC Rule 17-2.500, PSD. Therefore, the emissions of PM and TRS are subject to review pursuant to FAC Rule 17-2.520, Sources Not Subject to PSD or NAA Review.

The Nos. 1 and 2 Batch Digester Systems and the Nos. 1-3 MEE Systems are subject to the provisions of FAC Rule 17-2.600(4)(c)1. Besides the emissions standard for TRS, which would be allowed and applicable if the applicant did not incinerate the NCG, the regulation contains the provision for establishing a contingency plan.

Pursuant to FAC Rule 17-2.960(1), Compliance Schedules, the Nos. 1 and 2 Batch Digester Systems are to be in final compliance by May 12, 1989.

The Nos. 1-3 Lime Kilns are subject to the provisions of FAC Rule 17-2.650(2)(c)9. for PM and visible emissions (VE). As stated previously, the applicant requested a more stringent PM emission limiting standard than what would be allowed by rule. The VE standard is 10% opacity or less.

The Nos. 1-3 Lime Kilns are subject to the provisions of FAC Rule 17-2.600(4)(c)5. According to FAC Rule 17-2.600(4)(c)5.a., the emission limiting standard is 20 ppm by volume on a dry basis at standard conditions corrected to 10 percent oxygen as a 12-hour average. According to FAC Rule 17-2.600(4)(c)5.b., the sources are subject to FAC Rules 17-2.710, Continuous Emission Monitoring, and 17-2.960(1), Compliance Schedules. Pursuant to FAC Rule 17-2.960(1)(d)3., the lime kilns are to be in final compliance by November 12, 1989.

Compliance tests for PM shall be conducted using EPA Method 5 or 17 in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Compliance tests for TRS shall be conducted using EPA Method 16 or 16A in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Compliance tests for VE shall be conducted using EPA Method 9 in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

The one-time compliance test for SO₂ shall be conducted using EPA Method 6 in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

All of the sources are subject to FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-2.130, Plant Operations-Problems. Any notification required should be made or sent to the BESD office.

All of the sources are subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-2.140, Reports.

In accordance with FAC Rule 17-2.620(2), objectionable odors shall not be allowed off plant property.

III. Summary of Emissions

A. Emission Limitations

The regulated pollutants from the proposed project are TRS and PM. A VE standard also exists for the lime kilns (Nos. 1-3). The following table exhibits the maximum allowable emission standard/limit for the Nos. 1-3 Lime Kilns.

Table 2

Source	Pollutant	Max. Allowable Pollutant Emission Standard/Limit
No. 1 Lime Kiln	PM	16.0 lbs/hr, 70.1 TPY
	TRS	20 ppmvd @ std. conditions @ 10% O ₂ , as a 12-hr avg. (1.86 lbs/hr, 8.2 TPY)
	VE	10% opacity or less
No. 2 Lime Kiln	PM	16.0 lbs/hr, 20.1 TPY
	TRS	20 ppmvd @ std. conditions @ 10% O ₂ , as a 12-hr avg (1.95 lbs/hr, 8.5 TPY)
	VE	10% opacity or less
No. 3 Lime Kiln	PM	16.0 lbs/hr, 20.1 TPY
	TRS	20 ppmvd @ std. conditions @ 10% O ₂ , as a 12-hr avg. (2.06 lbs/hr, 9.0 TPY)
	VE	10% opacity or less

See Table 1's note for rationale

The emission limiting standards/limits are consistent with the applicable requirements pursuant to FAC Rules 17-2 and 17-4 and what was requested by the applicant and accepted by the DER's BAQM and Duval County's BESD.

B. Air Quality Analysis

From a technical review of the application packages and supplementary material, an air quality analysis was not required.

IV. Conclusion

The applicant submitted applications for construction permits in order to comply with the TRS regulations contained in FAC Rule 17-2 and to make changes that will provide compliance with the TRS, PM and visible emission limiting standards applicable to these sources. The applicant requested more restrictive PM emission limits for each lime kiln than what FAC Rule 17-2 would allow and the DER's BAQM and Duval County's BESD accepts the requests and feel that the limits are achievable.

A one-time test for SO₂ will be used to establish the overall SO₂ removal efficiency of each lime kiln and their associated scrubber system (Nos. 1, 2 and 3). Because of the assumption that all of the oxidized TRS NCG (SO₂) will be scrubbed out in each of the Nos. 2 and 3 Lime Kilns and their associated scrubber systems, the potential SO₂ emissions are considered to be zero. The potential SO₂ emissions for the No. 1 Lime Kiln are considered to be zero from the firing of sulfur laden fuel oil, because the SO₂ emissions will be scrubbed out in the lime kiln and its associated scrubber system. An evaluation of the test results will also be used to rule out or require further review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received for each source.

The General and Specific Conditions listed in the proposed permits (attached) will ensure compliance with all applicable requirements of FAC Rules 17-2 and 17-4.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

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

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

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

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

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

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

ATTACHMENTS

AC 16-141790

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The lime kiln may operate continuously, i.e., 8760 hrs/yr.
2. The maximum lime production rate shall not exceed 12,200 lbs CaO/hr (dry) and is based on a total process input rate of 24,000 lbs/hr lime mud (dry).
3. The No. 6 Fuel Oil firing rate shall not exceed 400 gals/hr (60 MMBtu/hr heat input). The sulfur content of the fuel oil shall not exceed 2.3% by weight.

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

4. The maximum pollutant emissions shall not exceed:

- a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
- b) Visible Emissions (VE): 10% Opacity or less
- c) TRS: 20 ppmvd @ standard conditions corrected to 10%
O₂, as a 12-hr average (1.86 lbs/hr, 8.2 TPY)
- d) SO₂: assumed to be zero for PSD tracking purposes

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

11. The No. 1 Lime Kiln shall be tested one-time only for SO₂ emissions to establish the overall removal efficiency of the lime kiln and its associated scrubber system. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

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

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

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

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

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

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

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

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

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

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

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

ATTACHMENTS

AC 16-141792

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The lime kiln may operate continuously, i.e., 8760 hrs/yr.
2. The maximum lime production rate shall not exceed 16,300 lbs CaO/hr (dry) and is based on a total process input rate of 32,000 lbs/hr lime mud (dry).
3. The No. 6 fuel oil firing rate shall not exceed 400 gals/hr (60 MMBtu/hr heat input). The sulfur content of the fuel oil shall not exceed 2.3% by weight.

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

5. The maximum pollutant emissions shall not exceed:

- a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
- b) Visible Emissions (VE): 10% Opacity or less
- c) TRS: 20 ppmvd @ standard conditions corrected to 10% O₂, as a 12-hr average (1.95 lbs/hr, 8.5 TPY)
- d) SO₂: assumed to be zero for PSD tracking purposes

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

13. The No. 2 Lime Kiln shall be tested one-time only for SO₂ emissions to establish the overall removal efficiency of the lime kiln and its associated scrubber system. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

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

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

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

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

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 16-141793
Expiration Date: March 27, 1990
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W

Project: No. 3 Lime Kiln

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

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

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

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

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

ATTACHMENTS

AC 16-141793

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The lime kiln may operate continuously, i.e., 8760 hrs/yr.
2. The maximum lime production rate shall not exceed 16,300 lbs CaO/hr (dry) and is based on a total process input rate of 32,000 lbs/hr lime mud (dry).
3. The No. 6 fuel oil firing rate shall not exceed 400 gals/hr (60 MMBtu/hr heat input). The sulfur content of the fuel oil shall not exceed 2.3% by weight.

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

5. The maximum pollutant emissions shall not exceed:

- a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
- b) Visible Emissions (VE): 10% Opacity or less
- c) TRS: 20 ppmvd @ standard conditions corrected to 10% O₂, as a 12-hr average (2.06 lbs/hr, 9.0 TPY)
- d) SO₂: assumed to be zero for PSD tracking purposes

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

13. The No. 3 Lime Kiln shall be tested one-time only for SO₂ emissions to establish the overall removal efficiency of the lime kiln and its associated scrubber system. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

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

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

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

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

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

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

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

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

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

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

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The Nos. 1 and 2 batch digester systems may operate continuously, i.e. 8760 hours/year.
2. The maximum production rate of the Nos. 1 and 2 batch digester systems shall not exceed 1987 TPD ADP (tons per day of air dried pulp and based on a nominal utilization rate of 580,000 lbs/hr wood chips (dry) and 898,000 lbs/hr of black/white liquor).

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

3. The Nos. 1 and 2 batch digester systems are subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.
4. The batch digester systems are subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.
5. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).
6. The batch digester systems are subject to the provisions of FAC Rules 17-2.240: Circumvention, 17-2.250: Excess Emissions, and 17-4.130: Plant Operation-Problems.
7. The batch digester systems are subject to the provisions of FAC Rules 17-2.710(4): Quarterly Reporting Requirements, and 17-4.140: Reports.
8. Compliance tests using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be conducted if the permittee does not incinerate the TRS gases from the batch digester systems in the No. 2 or 3 Lime Kiln.
9. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.
10. Pursuant to FAC Rule 17-2.960(1), the batch digester systems shall be in final compliance by May 12, 1989, and the permittee shall provide proof of final compliance to the Duval County's Bio-Environmental Services Division (BESD) office by June 26, 1989, unless otherwise restricted by Consent Order, OGC Case No. 86-1405.
11. The Nos. 1 and 2 batch digester systems shall be in compliance with all applicable provisions of FAC Rules 17-2 and 17-4.

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

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

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

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

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

16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO₂ emissions. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

PERMITTEE:
Seminole Kraft Corp.

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

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

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

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

For the permitting of the No. 1 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s), concentrator(s) and the new noncondensable gas (NCG) handling system constructed to collect and transport all of the NCG emissions from the MEE System to the No. 2 or 3 Lime Kiln for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 744.2 km East and 3365.6 km North.

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

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

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The No. 1 MEE system may operate continuously, i.e., 8760 hours/year.
2. The maximum total process input rate to the No. 1 MEE system shall not exceed 330,000 lbs/hr of black liquor (15% solids).

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

3. The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

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

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

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

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

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

16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO₂ emissions. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

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

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

For the permitting of the No. 2 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s), concentrator(s) and the new noncondensable gas (NCG) handling system constructed to collect and transport all of the NCG emissions from the MEE System to the No. 2 or 3 Lime Kiln for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 744.2 km East and 3365.6 km North.

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

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

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-141800
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The No. 2 MEE system may operate continuously, i.e., 8760 hours/year.

2. The maximum total process input rate to the No. 2 MEE system shall not exceed 450,000 lbs/hr of black liquor (15% solids).

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-141800
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

4. The MEE system is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

5. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

6. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).

7. In the event that a compliance test has to be performed on the MEE System for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used.

8. Pursuant to the Consent Order, OGC Case No. 86-1405, the MEE system shall be in compliance by August 12, 1988, and the permittee shall provide proof of final compliance to the Duval County's Bio-Environmental Services Division (BESD) office by September 26, 1988.

9. The MEE system shall be in compliance with all applicable provisions of FAC Rules 17-2 and 17-4.

10. The MEE system is subject to the provisions of FAC Rules 17-2.240: Circumvention, 17-2.250: Excess Emissions, and 17-4.130: Plant Operation-Problems.

11. The MEE system is subject to the provisions of FAC Rules 17-2.710(4): Quarterly Reporting Requirements, and 17-4.140: Reports.

12. The BESD office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the BESD office within 45 days of test completion.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-141800
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. (FAC Rules 17-2 and 17-4)

If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct. (FAC Rule 17-4)

14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to DER's Bureau of Air Quality Management office and the BESD office.

15. The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the lime kilns are the pollution control devices for the No. 2 MEE system.

16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO₂ emissions. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

PERMITTEE:
Seminole Kraft Corp.
P. O. Box 26998
Jacksonville, FL
32218-0998

Permit Number: AC 16-141801
Expiration Date: September 24, 1989
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: No. 3 Multiple Effect
Evaporator System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the permitting of the No. 3 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s), concentrator(s) and the new noncondensable gas (NCG) handling system constructed to collect and transport all of the NCG emissions from the MEE System to the No. 2 or 3 Lime Kiln for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 744.2 km East and 3365.6 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o MEE System 3-07-001-03

Construction will be in accordance with the permit application, plans, documents, and reference materials submitted unless otherwise stated in the General and Specific Conditions.

Attachments to be Incorporated:

1. Seminole Kraft's application package received November 12, 1987.
2. BESD's letter requesting additional information received December 10, 1987.
3. DER's incompleteness letter dated December 11, 1987.
4. NE District office's letter received January 4, 1988.
5. Seminole Kraft's response received January 26, 1988.
6. EPA's letter on NSPS guidelines dated October 23, 1987.
7. Technical Evaluation and Preliminary Determination dated March 31, 1988.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-141801
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-141801
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-141801
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-141801
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The No. 3 MEE system may operate continuously, i.e., 8760 hours/year.
2. The maximum total process input rate to the No. 3 MEE system shall not exceed 450,000 lbs/hr of black liquor (15% solids).

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-141801
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)l.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5.

4. The MEE system is subject to the provisions of FAC Rule 17-2.600(4)(c)l.c., which includes the requirement of establishing a contingency plan.

5. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

6. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).

7. In the event that a compliance test has to be performed on the MEE system for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used.

8. Pursuant to the Consent Order, OGC Case No. 86-1405, the MEE system shall be in final compliance by August 12, 1988, and the permittee shall provide proof of final compliance to the Duval County's Bio-Environmental Services Division (BESD) office by September 26, 1988.

9. The MEE system shall be in compliance with all applicable provisions of FAC Rules 17-2 and 17-4.

10. The MEE system is subject to the provisions of FAC Rules 17-2.240: Circumvention, 17-2.250: Excess Emissions, and 17-4.130: Plant Operation-Problems.

11. The MEE system is subject to the provisions of FAC Rules 17-2.710(4): Quarterly Reporting Requirements, and 17-4.140: Reports.

12. The BESD office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the BESD office within 45 days of test completion.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-141801
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the Certificate of Completion, and the contingency plan, to the BESD office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. (FAC Rules 17-2 and 17-4)

If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct. (FAC Rule 17-4)

14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to DER's Bureau of Air Quality Management office and the BESD office.

15. The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the lime kilns are the pollution control devices for the No. 3 MEE system.

16. The Nos. 2 and 3 Lime Kilns shall be tested for TRS and one-time only for SO₂ emissions. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____ LOCTN: _____
 To: _____ LOCTN: _____
 To: _____ LOCTN: _____
 FROM: _____ DATE: _____

TO: Main File: AC 16-141790

FROM: Bruce Mitchell *BM*

DATE: March 24, 1988

SUBJ: Calculation of TRS Limits From the Emission Limiting Standard

Based on stack test parameters received today via phone from Mr. Mike Riddle, with the Seminole Kraft Corporation, the TRS emission limits are calculated:

Parameters:

29,100 acfm
 9.0% O₂
 35% H₂O
 160° F

Standard: 20ppmvd @ standard conditions @ 10% O₂

Correction for O₂:

$(21-10)/(21-9.0) = 0.917$
 $20 \text{ ppm}/0.917 = 21.81 \text{ ppm}$

Correction for H₂O:

$29,100 \text{ acfm} \times (1-0.35) = 18,915 \text{ dcfm}$

Therefore,

$PV = mRT$
 $m = PV/RT$

$m = (14.7 \times 144) \text{ lbf/ft}^2 \times 18,915 \text{ dcfm} \times \text{lbf-R}^\circ/45.44 \text{ ft-lbf} \times$
 $1/(460+160) \text{ R}^\circ \times 60 \text{ min/hr} \times 21.81 \text{ ppm}/10^6 = 1.86 \text{ lbs/hr}$
 as H₂S

$1.86 \times 4.38 = 8.15 \text{ TPY}$

cc: Reading File }
 Jerry Woosley } 3-24-88 *BM*



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE	
To: _____	LOCTN: _____
To: _____	LOCTN: _____
To: _____	LOCTN: _____
FROM: _____	DATE: _____

TO: Main File: AC 16-141792

FROM: Bruce Mitchell *BM*

DATE: March 24, 1988

SUBJ: Calculation of TRS Limits From the Emission Limiting Standard

Based on stack test parameters received today via phone from Mr. Mike Riddle, with the Seminole Kraft Corporation, the TRS emission limits are calculated:

- Parameters:
- 26,350 acfm
 - 8.5% O₂
 - 29% H₂O
 - 150° F

Standard: 20ppmvd @ standard conditions @ 10% O₂

Correction for O₂:

$$(21-10)/(21-8.5) = 0.880$$

$$20 \text{ ppm}/0.880 = 22.73 \text{ ppm}$$

Correction for H₂O:

$$26,350 \text{ acfm} \times (1-0.71) = 18,709 \text{ dcfm}$$

Therefore,

$$PV = mRT$$

$$m = PV/RT$$

$$m = (14.7 \times 144) \text{ lbf/ft}^2 \times 18,709 \text{ dcfm} \times \text{lbfm-R}^\circ/45.44 \text{ ft-lbf} \times 1/(460+150) \text{ R}^\circ \times 60 \text{ min/hr} \times 22.73 \text{ ppm}/10^6 = 1.95 \text{ lbs/hr}$$

as H₂S

$$1.95 \times 4.38 = 8.54 \text{ TPY}$$

cc: Reading File
 Jerry Woosley, BESD } 3-28-88 *BM*



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

TO: Main File: AC 16-141793

FROM: Bruce Mitchell *B.M.*

DATE: March 24, 1988

SUBJ: Calculation of TRS Limits From the Emission Limiting Standard

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____ LOCTN: _____

To: _____ LOCTN: _____

To: _____ LOCTN: _____

FROM: _____ DATE: _____

Based on stack test parameters received today via phone from Mr. Mike Riddle, with the Seminole Kraft Corporation, the TRS emission limits are calculated:

Parameters:
22,275 acfm
6.0% O₂
26% H₂O
150° F

Standard: 20ppmvd @ standard conditions @ 10% O₂

Correction for O₂:
 $(21-10)/(21-6.0) = 0.733$
20 ppm/0.733 = 27.29 ppm

Correction for H₂O:
22,275 acfm x (1-0.74) = 16,484 dcfm

Therefore,
PV = mRT
m = PV/RT

$m = (14.7 \times 144) \text{ lbf/ft}^2 \times 16,484 \text{ dcfm} \times \text{lbf-R}^\circ / 45.44 \text{ ft-lbf} \times$
 $1 / (460 + 150) \text{ R}^\circ \times 60 \text{ min/hr} \times 27.29 \text{ ppm} / 10^6 = 2.06 \text{ lbs/hr}$
as H₂S

2.06 x 4.38 = 9.02 TPY

cc: Reading File }
Jerry Woosley } 3-28-88 RAN

3-21-84

FC

~~3~~
9:34

Johnny Cote

@ 9:47

← Mike Riddle
@ SKC 751-6400 |

#1	9.0%	^{low} 4.0%
#2	8.5%	4.0%
#3	6.0%	4.0%

Refunds Due

oil line kit	AC 16-141790
"	141792
"	141793
4R Batch Digester Sys.	141798
MEE Sys.	141799
"	141800
"	141801

Paid	Due	R.#
1000.00	900.00	76193
1000.00	900.00	76193
1000.00	900.00	76193
1000.00	900.00	76193
1000.00	900.00	76193
1000.00	900.00	76193
1000.00	<u>900.00</u>	76193
	\$6300.00	

Maggie,

Flamba,

Bunn

3-23-88

AC 16-141794

Smelt Dissolving Tanks

141795

141796

794

795

796

✓ # 9389

✓ # 9390

✓ # 9391

R# 76193

R# 76193

R# 76193

pd. \$1000.00

pd. \$1000.00

pd. \$1000.00

ref. \$900.00

ref. \$900.00

ref. 900.00

Maggie - "Seminole Kraft Corp."

RECEIVED

J. Banks

Bunn

RECEIVED

FEB 8 1988

DEC 8 1987

Best Available Copy
APPLICATION FOR REFUND
FROM
STATE OF FLORIDA

STATE OF FLORIDA)
COUNTY OF _____)

Pursuant to the provisions of Section 215.26, or Section _____, Florida Statutes, I hereby apply for a refund and request that a State warrant be drawn in favor of:

NAME: Mr. T. Frank Lee, General Manager, Seminole Kraft Corporation

ADDRESS: 9469 Eastport Road, Post Office Box 26998
Jacksonville, FL 32218

AMOUNT: \$900.00, Permit No.: AC 16-141792 (No. 2 Lime Kiln)

Which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

Reason for Claim: Over payment for processing of permit.

Receipt No. 76193

CERTIFIED TRUE AND CORRECT this 17 day of May 19 88

(Signature)

Must be completed if authority is other than Section 215.26, Florida Statutes.

(FOR AGENCY USE ONLY)

() Agency recommends denial of above claim based on the following facts, including statutory authority for collection: _____

or

() Agency recommends approval of above claim and submits the following information to substantiate such claim.

The amount recommended \$ _____.

The amount requested above was originally deposited into the State Treasury, included in the State Treasurer's Receipt # _____, dated _____.

() General Revenue _____
(Revenue Code)

() Trust _____
(Name and Code Number of Trust Account)

Statutory Authority for Collection _____

It is requested that payment be made from:

() Refund of Overpayment of Taxes - General Revenue-Refunds (1-441-0211)

() Trust _____
(Name and Code Number of Trust Account)

CERTIFIED TRUE AND CORRECT this _____ day of _____ 19 _____

(Agency)

(Signature of Authorized Person)

(Title)

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE RIGHT TO SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted to mean three years from the date of payment into the State Treasury.

APPLICATION FOR REFUND
FROM
STATE OF FLORIDA

STATE OF FLORIDA)
COUNTY OF _____)

Pursuant to the provisions of Section 215.26, or Section _____, Florida Statutes, I hereby apply for a refund and request that a State warrant be drawn in favor of:

NAME: Mr. T. Frank Lee, General Manager, Seminole Kraft Corporation
ADDRESS: 9469 Eastport Road, Post Office Box 26998
Jacksonville, FL 32218
AMOUNT: \$900.00, Permit No.: AC 16-141793 (No. 3 Lime Kiln)

Which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

Reason for Claim: Over payment for processing of permit.
Receipt No. 76193

CERTIFIED TRUE AND CORRECT this 17 day of May 19 88

(Signature)

Must be completed if authority is other than Section 215.26, Florida Statutes.

(FOR AGENCY USE ONLY)

Agency recommends denial of above claim based on the following facts, including statutory authority for collection: _____

or

Agency recommends approval of above claim and submits the following information to substantiate such claim.
The amount recommended \$ _____.

The amount requested above was originally deposited into the State Treasury, included in the State Treasurer's Receipt # _____, dated _____.

General Revenue _____
(Revenue Code)

Trust _____
(Name and Code Number of Trust Account)

Statutory Authority for Collection _____
It is requested that payment be made from:

Refund of Overpayment of Taxes - General Revenue-Refunds (1-441-0211)

Trust _____
(Name and Code Number of Trust Account)

CERTIFIED TRUE AND CORRECT this _____ day of _____ 19 _____

(Agency)

(Signature of Authorized Person)

(Title)

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE RIGHT TO SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted to mean three years from the date of payment into the State Treasury.

CM: # Missing

PM
1.25.88
Jacksonville, FL
Jacksonville Mill

File Copy



Seminole Kraft Corporation

9469 Eastport Road
P.O. Box 26998
Jacksonville, Florida 32218-0998

DER

904 751-6400

January 22, 1988

JAN 26, 1988

BAQM

Mr. C.H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management.
Florida Dept. of Environmental Regulation
2600 Blair Road
Tallahassee, FL 32301

Subject: Response to Florida DER Incompleteness Letter
of 12-11-87

Dear Mr. Fancy:

This is in response to your letter of December 11, 1987 which deemed our TRS control construction permits to be incomplete. This letter will provide answers to those questions posed by the Department which are applicable to these applications.

DER Question #1 - Not applicable, just a listing of assigned permit numbers.

DER Question #2 - Seminole Kraft does not believe the Department has authority within the context of these TRS construction permits to request this information. However, in the interest of cooperation we will answer this question. There have been no physical changes or changes in the method of operation of any of the sources in the referenced applications except maintenance of various process equipment and the tie in of the non-condensable gases from the evaporator hot wells which took place with the Department's approval in October, 1987. The information requested regarding this latter change is contained in the construction permits for the evaporators previously submitted.

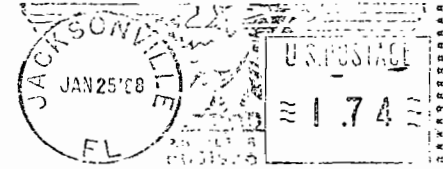
DER Question #3 - We believe the #2 and #3 lime kilns have equal capability to incinerate the TRS gases.



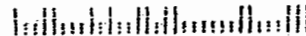
Seminole Kraft Corporation

9469 Eastport Road
P.O. Box 26998
Jacksonville, Florida 32218-0998

1-27-88
~~CHF~~ 1/27/88
Bruce



cy, P.E.
Deputy Chief
Bureau of Air Quality Management
Florida Dept of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301



Mr. C.H. Fancy
Florida DER
Page 2

DER Question #4 - The lime kilns will not be used for incinerating the TRS gases while in a non-processing mode.

DER Question #5 - We plan to run compliance tests at or near the operating rates stated in the applications and will provide those results as soon as available. Where appropriate, we will accept operating rates at which we can demonstrate compliance if compliance cannot be demonstrated at operating rates within 90% of the operating rates stated in the applications per Florida DER regulations. However, we would like to note that these sources have the ability to operate at higher capacity for short periods of time.

DER Question #6 - There will be no net emissions increase as a result of the changes contemplated in these construction permit applications. Therefore, an ambient air quality analysis and a PSD maximum concentration increase (increment) analysis is not required.

DER Question #7 - This refers to a letter from BESD with a series of questions.

Lime Kiln Nos. 1, 2 & 3

Section III A - As indicated in our answer to DER Question #5.

Section III B - Dry basis means dry solids without associated water.

Section III C - See Attachment A for calculations.

Section III E - Because the #1 lime kiln is shorter, it requires more BTU's per ton of lime to get the job done.

Smelt Dissolving Tank No.s 1, 2 & 3

Section III A - As indicated in our answer to DER Question #5. Also, with respect to BESD's point that particulate and TRS emission limits from these sources should be based on black liquor solids; we disagree. While the TRS emissions limit for these sources is based on black liquor solids, the particulate emissions have traditionally been based on molten smelt through the smelt tank.

Section III C - See Attachment B for calculations.

Section III D - A revised operation and maintenance plan will be prepared in conjunction with an operation permit application for this source at a later date.

Batch Digester System No.1 & 2

Section II C - The costs should have read as follows:

NCG System Upgrade	\$ 65,000
Computer Control System	<u>1,185,000</u>
TOTAL	\$1,250,000

Section III A - Florida DER previously determined that this is one system so the maximum capacity is for the total of both systems and was provided as indicated in Section III A of application.

Section III C -

Total Process Input Rate (lb/hr) = 1,478,000 lbs/hr
Product weight (lb/hr) = 165,583 lbs AD Pulp/hr

III H - Based on previous discussions with DER the emission point for the non-condensable gas system, should be provided here. This is the lime kilns and the information can be found at Section III-H on the lime kiln applications.

Attachment A

Lime Kiln #1 will not be used for NCG incineration.

Seminole Kraft believes this response and the information contained herein should be more than adequate to allow the Department to deem our TRS construction permit applications complete. Hence, we urge the Department to issue construction permits for these sources as soon as possible so that Seminole Kraft can proceed with installation of these additional TRS control measures. We must also point out

Mr. C.H. Fancy
 Florida DER
 Page 4

that the Consent Order executed by BESD, Florida DER and Seminole Kraft Corporation requires that certain of these improvements be complete in the very near future. They are:

<u>Item</u>	<u>Final Compliance Dates</u>
Smelt Dissolving Tanks	May, 1988
ME Evaporators	August, 1988

As you know, the evaporators have already, with the Department's approval, been completed. However, the smelt tanks' construction must begin in the near future to meet the May final compliance date. Accordingly, we request the Department provide expedited handling of this permit so that the final Consent Order compliance date is not put in jeopardy.

Finally, we note that a change in the Department's rules indicate that potential emissions are now after the control equipment and, hence, we submitted more in permit fees than was necessary. Accordingly, we now believe the proper fees should have been as shown below and we request the Department refund the amount shown.

<u>Source</u>	<u>Fee Submitted</u>	<u>Actual Required</u>
No.1 Dissolving Tank	\$ 1,000	\$ 100
No.2 Dissolving Tank	1,000	100
No.3 Dissolving Tank	1,000	100
No.1 & 2 Batch Digestor	1,000	100
No.1 Line Multi Effect Evap.	1,000	100
No.2 Line Multi Effect Evap.	1,000	100
No.3 Line Multi Effect Evap.	1,000	100
No.1 Lime Kiln	1,000	100
No.2 Lime Kiln	1,000	100
No.3 Lime Kiln	1,000	100
	<u>\$10,000</u>	<u>\$1,000</u>
Refund Due:	\$ 9,000	

Mr. C.H. Fancy
Florida DER
Page 5

Please send a refund check made payable to Seminole Kraft Corporation to David P. Ledbetter, Seminole Kraft Corporation, 9469 Eastport Road, P.O. Box 26998, Jacksonville, Florida 32218-0998.

Sincerely,

SEMINOLE KRAFT CORPORATION



T. Frank Lee
General Manager

ah

CC: Mr. Ernest Frey - Florida DER
Mr. Donald Bayly - BESD
Mr. Jerry Woosley - BESD
Mr. John Millican
Mr. Terry Cole
Mr. Malcolm Williams
Mr. Mike Riddle
Mr. Curt Barton

Copied: Bruce Mitchell }
Roderic Raval } 1-26-88 (mp)
CHF/BT

ATTACHMENT A

Lime Kiln Emissions

Particulate Emissions

Allowable - Based on $E = 3.59P^{0.63}$ at process weight indicated in original operation permit application. We are accepting these original limits to avoid an emission increase.

$$\#1 \text{ Kiln} - E = 3.59 (11.09)^{0.62} = 16 \text{ lb/hr}$$

$$\#2 \text{ Kiln} - E = 3.59 (11.17)^{0.62} = 16 \text{ lb/hr}$$

$$\#3 \text{ Kiln} - E = 3.59 (11.17)^{0.62} = 16 \text{ lb/hr}$$

Potential Emissions - Based on original potential emissions submitted by Jacksonville Kraft.

ATTACHMENT B

Smelt Dissolving Tank Emissions

Particulate Emissions

Allowable - Based on $E = 3.59P^{0.62}$ at process weight indicated in the original operation permit application. We are accepting these original limits to avoid an emission increase.

$$\#1 \text{ Dissolver} - E = 3.59 (11.35)^{0.62} = 16.2 \text{ lb/hr}$$

$$\#2 \text{ Dissolver} - E = 3.59 (14.52)^{0.62} = 18.9 \text{ lb/hr}$$

$$\#3 \text{ Dissolver} - E = 3.59 (14.52)^{0.62} = 18.9 \text{ lb/hr}$$

Note: Calculation in original application had a typo and indicated allowable on #2 and #3 dissolver was 18.6. Those allowable emissions shown above are correct. This change should be reflected on the interim operating permits.

Potential Emissions - Based on original potential emissions submitted by Jacksonville Kraft.

TRS EMISSIONS

Allowable - Based on 0.048 lb/3000 #BLS and process rates shown for each Recovery Boiler.

$$\#1 \text{ Dissolver} - \frac{0.048 \text{ lb}}{3000 \text{ \#BLS}} \times \frac{51,500 \text{ lb BLS}}{\text{hr}} = .82 \text{ lb/hr}$$

$$\#2 \text{ Dissolver} - \frac{0.048 \text{ lb}}{3000 \text{ \#BLS}} \times \frac{65,900 \text{ lb BLS}}{\text{hr}} = 1.05 \text{ lb/hr}$$

$$\#3 \text{ Dissolver} - \frac{0.048 \text{ lb}}{3000 \text{ \#BLS}} \times \frac{65,900 \text{ lb BLS}}{\text{hr}} = 1.05 \text{ lb/hr}$$

Saver

ATTACHMENT A

Lime Kiln Emissions

Particulate Emissions

Allowable - Based on $E = 3.59P^{0.63}$ at process weight indicated in original operation permit application. We are accepting these original limits to avoid an emission increase.

					<i>allowable</i>
#1 Kiln	- E = 3.59	(11.09)	0.62	= 16 lb/hr	16.76
		12.00 (11-10-87)		15.96	
#2 Kiln	- E = 3.59	(11.17)	0.62	= 16 lb/hr	20.03
		16.00 (11-10-87)		16.03	
#3 Kiln	- E = 3.59	(11.17)	0.62	= 16 lb/hr	20.03
		16.00 (11-10-87)		16.03	

Potential Emissions - Based on original potential emissions submitted by Jacksonville Kraft.

Save

14.52
2000
2904000

ATTACHMENT B

Smelt Dissolving Tank Emissions

Particulate Emissions

Allowable - Based on $E = 3.59P^{0.62}$ at process weight indicated in the original operation permit application. We are accepting these original limits to avoid an emission increase.

#1 Dissolver - E = 3.59 (11.35) ^{0.62}	= 16.2 lb/hr	18.03	+ 8.01
AC 16-141794	13.50 (11-10-87)	16.19	
#2 Dissolver - E = 3.59 (14.52) ^{0.62}	= 18.9 lb/hr	21.0	+ 9.20
AC 16-141795	17.27	18.86	
#3 Dissolver - E = 3.59 (14.52) ^{0.62}	= 18.9 lb/hr	21.0	+ 9.20
AC 16-141796	17.27	18.86	
			26.21

Note: Calculation in original application had a typo and indicated allowable on #2 and #3 dissolver was 18.6. Those allowable emissions shown above are correct. This change should be reflected on the interim operating permits.

Potential Emissions - Based on original potential emissions submitted by Jacksonville Kraft.

TRS EMISSIONS

Allowable - Based on 0.048 lb/3000 #BLS and process rates shown for each Recovery Boiler.

#1 Dissolver - $\frac{0.048 \text{ lb}}{3000 \text{ #BLS}}$ x	$\frac{51,500 \text{ lb BLS}}{\text{hr}}$ (11-10-87)	= .82 lb/hr
#2 Dissolver - $\frac{0.048 \text{ lb}}{3000 \text{ #BLS}}$ x	$\frac{65,900 \text{ lb BLS}}{\text{hr}}$ (11-10-87)	= 1.05 lb/hr
#3 Dissolver - $\frac{0.048 \text{ lb}}{3000 \text{ #BLS}}$ x	$\frac{65,900 \text{ lb BLS}}{\text{hr}}$ (11-10-87)	= 1.05 lb/hr

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

January 22, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. T. Frank Lee, General Mgr.
Seminole Kraft Corp.
9469 Eastpoint Road
P. O. Box 26998
Jacksonville, Florida 32218-0998

Dear Mr. Lee:

Re: Pre and Post Test to Establish SO₂ Control Efficiencies

It has become apparent in the review of the various permit applications received regarding the TRS NCG systems that the selected combustion devices and their associated control efficiencies for sulfur dioxide (SO₂) are not established. Therefore, a pre and post test will be required to establish the SO₂ removal efficiency of each combustion device (e.g. lime kiln), which is currently operating and in which TRS emissions are proposed to be incinerated.

It is advised that you perform the pre-test at your next earliest convenience (e.g. annual compliance test). Please submit the test data to the Department's Bureau of Air Quality Management to review and to document the results for the file.

If you have any questions, please call Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/PR/s

cc: S. Smallwood
J. Brown
B. Thomas
B. Pittman
M. Zilberberg
K. Mehta

Protecting Florida and Your Quality of Life

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

Mr. T. Frank Lee
General Manager
Seminole Kraft Corporation
P. O. Box 26998
Jacksonville, Florida 32218-0998

Re: Seminole Kraft Mill
Production Capacity
November 10, 1987, Letter

DER
JAN 04 1988
BAQM

Dear Mr. Lee:

The Bio-Environmental Services Division (BESD) and the Department of Environmental Regulation (DER) have reviewed the above captioned document and the appropriate attachments concerning maximum capacities of various pollution sources at the mill. The following comments and questions are provided:

1. Please explain the difference between air dried pulp (ADP) and machine dried pulp (MDP)? Please indicate what the relationship is between these terms.
2. On the amendments to the Recovery Boiler applications, please indicate the percent moisture in Section III B, on each application. Provide the emission calculations which support the emission rates presented in Section III C.
3. On the amendments to the Smelt Dissolving Tank applications please provide the black liquor solids input on the corresponding recovery boiler since the particulate emission rate is predicated upon this rate. In Section III C, please provide the emission calculation supporting the emission rates in columns 1 and 3, Section III C.
4. On the amendments to the Batch Digester Systems applications, please indicate the maximum capacity of each unit and not the average operating condition input rates.

The lbs/hr of TRS generated by the digesting systems should be provided. What is the expected increase in sulphur dioxide emissions from the lime kilns due to the oxidation of the reduced sulphur compounds?

5. On the amendments to the Multiple Effective Evaporator Systems what are expected TRS emissions on a lbs/hr basis from the hot wells? What is the expected increase in sulphur dioxide emissions from the lime kilns due to the oxidation of the reduced sulphur compounds?

6. On the amendments to the Lime Kiln applications, please indicate what is dry basis? Provide emission calculations supporting the emission rates found in columns 1 and 3, Section III, C.

In reference to the letter from Mr. Terry Cole to Mr. Mark Zilberberg dated November 5, 1987, the suggested language suggested for a specific condition is not appropriate. The purpose of the discussions concerning "capacity" is to state on the permit what the maximum operating capacity of each unit is at the existing configuration of each unit. This language allows operation on a unit at a higher level which does not provide reasonable assurance based upon test results that a source is in compliance nor has the question of maximum capacity been answered. It is not the desire of the Department nor BESD to limit operation of the units in questions so as to arbitrarily reduce production or economic benefit, however, each unit does have a maximum capacity and that is required on each permit.

The Department and BESD have agreed to allow testing to determine the existing maximum capacity of each unit. In order to determine this maximum and proceed with the issuance of the interim operation permits it is requested that testing be scheduled for each unit for which an increase of the permitted capacity is requested. Appropriate notification of the tests should be provided to the BESD and testing should be accomplished on or before January 31, 1988. The test reports should be submitted to BESD as soon as possible thereafter but no later than 45 days after the test. Hopefully this procedure will allow an expeditious resolution of these matters.


Your response to the questions above on or before December 31, 1987 is appreciated.

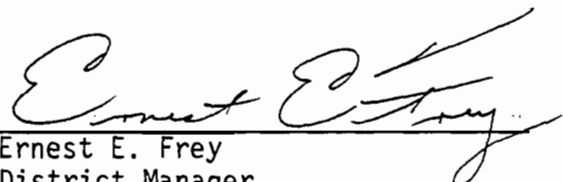
If you have any further questions concerning this matter, please contact Mr. Khurshid Mehta or Mr. Jerry Woosley at (904) 630-3210.

Very truly yours,

City of Jacksonville
Bio-Environmental Services Division

State of Florida
Dept. of Environmental Regulation


Donald C. Bayly
Interim Deputy Director


Ernest E. Frey
District Manager

 DCB/EEF/ecr

cc: BESD File 2155
Disc 2, 25
~~Mr. Clair Fancy, P.E., DER~~

Copied: CHE/BT
Bruce Mitchell }
Pradeep Raval } 1.4.88

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

~~TO~~ CLAIR FANCY

Initial

Date

2.

TALLY

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

DER
JAN 4 1988
BAQM

FROM: DER-JAX

~~DER~~ AIR

DATE

DB

PHONE

P 274 007 620

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

U.S.G.P.O. 1985-480-794

SM: T. Frank Lee, G.M.	
Seminole Kraft Corporation	
Street and No. 9469 Eastport Road	
P.O. Box 26998	
Jacksonville, FL 32218-0998	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$

Postmark or Date Mailed: 12/11/87
Permits: AC 16-141790, -92, -93, -94, -95, -96, -98, -99, -300, and -801

PS Form 3800, June 1985

PS Form 3811, July 1983 447-845

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: T. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Post Office Box 26998
Jacksonville, FL 32218-0998

4. Type of Service: Article Number

<input type="checkbox"/> Registered	<input type="checkbox"/> Insured	P 274 007 620
<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD	
<input type="checkbox"/> Express Mail		

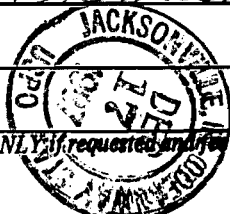
Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
X *T. Frank Lee*

6. Signature - Agent
X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)



DOMESTIC RETURN RECEIPT

file

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

December 11, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. T. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Post Office Box 26998
Jacksonville, Florida 32218-0998

Dear Mr. Lee:

Re: Completeness Review of Applications to Construct
AC 16-141790, -141792, -141793, -141794, -141795, -141796,
-141798, -141799, -141800 and -141801

The Department received your cover letter and above referenced applications, dated November 11, 1987, on November 12, 1987. Based on a technical review of these applications, they have been deemed incomplete. Therefore, please submit to the DER's Bureau of Air Quality Management (BAQM) office, including all assumptions, calculations and reference material, the following information so their status can, again, be ascertained:

1. For reference purposes, the assigned permit numbers and sources are:

AC 16-141790	No. 1 Lime Kiln
-141792	No. 2 Lime Kiln
-141793	No. 3 Lime Kiln
-141794	No. 1 Smelt Dissolving Tank (SDT)
-141795	No. 2 SDT
-141796	No. 3 SDT
-141798	Nos. 1 & 2 Digester Systems
-141799	No. 1 Multiple Effect Evaporator (MEE) System
-141800	No. 2 MEE System
-141801	No. 3 MEE System

2. Since September 24, 1976, has there been any physical changes to or change in the method of operation to any of the sources in the above referenced applications? Please document any change(s) and their associated cost(s).

Mr. T. Frank Lee
Page Two
December 11, 1987

3. What lime kiln will be designated as the primary combustion source for incinerating the TRS gases that will be collected and transported by the noncondensable gas (NCG) handling system? Secondary source, etc.?
4. Will a lime kiln be used to incinerate any TRS gases from the NCG handling system while in a non-processing mode of operation? If so, please explain.
5. Until the Interim Operation Permits (IOP) have been amended, the affected sources' proposed increases in the raw materials and chemicals, product weight, and pollutant emissions above the IOP capacities will subject the facility to new source review for both prevention of significant deterioration (PSD) and nonattainment areas pursuant to Florida Administrative Code (FAC) Rules 17-2.500(5) and 17-2.510(4), respectively. Therefore, please provide the DER's BAQM office and the Duval County's Bio-Environmental Services Division (BESD) office with test results and pertinent documentation to provide reasonable assurance that each source, in its current state, can achieve the maximum process capacity of raw materials and chemicals and product weight requested in the above referenced applications and comply with the emission limiting standards in FAC Rule 17-2, and includes the Nos. 1, 2 and 3 Recovery Boilers.
6. Please provide an ambient air quality standards (AAQS) analysis and a PSD maximum concentration increase (increment) analysis for all pollutants which have a facility-wide PSD significant net emissions increase. These analyses should be sufficient to give the Department and BESD reasonable assurance that the net emissions increase will not cause or contribute to any AAQS or increments violation.
7. Please address all of the concerns listed in the attached letter from the BESD office. If there are any repetitive questions, please just provide the one answer and acknowledge the citing in your response.

Mr. T. Frank Lee
Page Three
December 11, 1987

If there are any questions, please call Bruce Mitchell, Pradeep Raval or Max Linn, at (904)488-1344, or write to me at the above address.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/BM/bm

Attachment

cc: K. Mehta, BESD
B. Pittman, Esq.
J. McKinnon, P.E., SCC

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division
Air and Water Pollution Control

December 10, 1987



DER

DEC 10 1987

BAQM

Mr. Claire Fancy, P.E.,
Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Office Bldg.
Tallahassee, Florida 32077

Re: Jefferson Smurfit Corporation
TRS Construction Permit Applications

Dear Mr. Fancy:

Bio-Environmental Services Division (BESD) provides the following comments on the captioned permit applications:

Smelt Dissolving Tank

Section III A

Does the given smelt process weight (96,240 lbs/hr) correspond to the recovery boiler process weight (137,500 lbs/hr black liquor solids) or the previous recovery boiler process weight (120,000 lbs/hr black liquor solids)?

The applicable rule for the SDT particulate matter emissions is 17-2.650(2)(c)10., Florida Administrative Code (FAC). The same rule is applicable for visible emissions.

It is noted that the requested particulate matter emission rate is significantly lower than the rate which is derived using the equation found in the referenced rule. If Jefferson Smurfit Corporation (JSC) desires a lower particulate matter limit it must be understood that the limit cannot be increased at a later date without a modification permit. The potential emissions should be reported as uncontrolled emissions in accordance with the permit application procedures.

Recovery Boiler

Section III A

At what percent moisture are the black liquor solids fired? What is dry?

Section III C

It is noted that the allowable particulate matter emission rate calculated using the correct standard (3 lbs/3000 lbs black liquor solids fired) is 137.5 lbs/hr. based upon the requested operating rate. If JSC desires a lower particulate matter limit it must be understood that the limit cannot be increased at a later date without a modification permit. The potential emissions should be reported as uncontrolled emissions in accordance with the permit application procedures.

Section III E

Are black liquor and fuel oil fired simultaneously at the given rates?

Digester System

Attachment B, Section I A and B

Do the figures in A represent the maximum hourly capacity and the figures in B the maximum hourly average based on maximum daily input? This item should be clearly explained.

General Comments

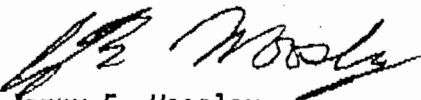
The construction permit applications definitely request higher operating capacities than are currently permitted. In accordance with the agreement reached in the November 4, 1987 meeting in Tallahassee (concerning the permit applications), testing for demonstrating highest existing capacity of a unit should be performed at a minimum of 96% of the maximum capacity. This testing is essential in establishing the actual capacities of the units. It is strongly urged that testing at these rates be done prior to issuance of any construction permit.

It is noted from the literature provided that the modifications proposed for the Recovery Boiler will allow increases in production capacity through increased efficiency and higher furnace operating rates. This literature further supports the need for establishing the maximum capacities of the units at this time.

In addition to the capacity increase the literature indicates a prime environmental benefit of a significant reduction in furnace generated TRS (below 3 ppm). This modification coupled with the recently installed molecular oxygen system on the black liquor oxidation system should allow JSC to consistently maintain TRS emissions at or below the 5 ppm level. In furtherance of a good faith effort by JSC and an opportunity to reduce allowable TRS emissions by an additional 70 tons per year it is requested that the JSC agree to the 5 ppm emission limit in the construction permit. The technology review presented in the permit application appears to make this option feasible.

If BESD may be of further assistance in this matter, please advise.

Very truly yours,



Jerry E. Woosley
Associate Pollution Control Engineer

JEW/ecr

cc: Mr. Bill Stewart, P.E., DER
Mr. Gene Tonn, P.E., JSC
BESD 1010 A
Disc 1, 46

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division
Air and Water Pollution Control

December 10, 1987



Mr. Clair Fancy P.E.
Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Office Bldg.
Tallahassee, Florida 32077

DER

DEC 10 1987

BAQM

Re: Seminole Kraft Corporation
TRS Construction Permit Applications

Dear Mr. Fancy:

Bio-Environmental Services Division provides the following comments on the captioned permits:

Lime Kiln Nos. 1, 2, and 3

Section III A

The requested process input rates are higher than the current operation permits limits. Testing at the actual maximum capacity should be performed prior to issuance of the construction permits.

Section III B

What is dry basis? Please clarify.

Section III C

Show the emission calculations. Note: On Lime Kiln Nos. 2 and 3 the given maximum allowable and maximum actual emissions are less than the calculated emissions using the process weight table. This point should be clarified.

Section III E

The heat input for each of the three kilns is listed as 60×10^6 BTUs per hour, however, the process input rate on Kiln Nos. 2 and 3 is approximately 33% higher than on Kiln No. 1. Please clarify.

Smelt Dissolving Tank Nos. 1, 2, and 3

Section III A

The requested input rates are higher than the current operation permit limits. Testing at the maximum actual capacity should be performed prior to issuance of the construction permits. It is also noted that the application indicates the utilization rate of molten smelt. The allowable emissions for particulate matter and TRS are based upon the black liquor solids input to the recovery boiler and not the smelt input to the smelt dissolving tank. This point should be clarified.



Section III C

Show the emission calculations.

Section III D

A revised operation and maintenance plan should be submitted with the operation permit application.

Multiple Effect Evaporator Line Nos. 1, 2, and 3

Applications are satisfactory.

Batch Digester System Nos. 1 and 2

Section III C

Costs of the pollution control systems are incorrectly totaled. Please correct.

Section III A

The maximum capacity for each system should be given. This is required by Rule 17-2.960 Florida Administrative Code (FAC).

Section III C

What is the maximum process input rate and maximum product weight?

Section III H

The operating characteristics of the non-condensable gas systems should be provided. This is needed to check the capability of the systems to capture and transport the digester system emissions to the lime kiln(s).

Attachment A

Will Lime Kiln No. 1 be used for NCG incineration? If so please provide documentation indicating the capabilities of Lime Kiln No. 1 to accommodate the NCG gases.

If BESD may be of further assistance in this matter, please advise.

Very truly yours,



Jerry E. Woosley
Associate Pollution Control Engineer

JEW/ecr

cc: Mr. Bill Stewart, P.E., DER
Mr. Mike Riddle, Seminole Kraft Corp.
BESD File 2155-A
Disc 1, 45

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. SHAFER
ASSISTANT DISTRICT MANAGER

FAX TRANSMITTAL LETTER

Date Sent: 12/10/87

TO:

Name: Clair Fancy, P.E.

Agency: BAQM DER

FAX Phone Number: _____

Number of pages (including this cover sheet): 5

FROM:

Jacksonville District

Transmitted on a Hitachi HIFAX 35; FAX phone number:
(904) 396-6196. This is a dedicated line.

If you have any questions please call Suncom 826-4200
or (904) 798-4200 and ask for _____.

Please call immediately if any of these pages are not
clearly received.

Senders name: Jerry Woosley

Remarks: Route to Pradeep Raval - CAPS



Seminole Kraft Corporation

Jacksonville Mill
9469 Eastport Road
P.O. Box 26998
Jacksonville, Florida 32218-0998

DER

November 10, 1987

904 751-6400

NOV 12 1987

BAQM

Mr. Steve Smallwood, P.E.
Chief, Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

Subject: Production Capacity of Seminole Kraft Mill

Dear Mr. Smallwood:

Following the submittal of the original interim operating permit applications for Seminole Kraft, there have been extensive discussions regarding the maximum rates of certain processes and the regulatory significance of these rates. In recent weeks the mill's production capacity has been the subject of various discussions. In the process of examining maximum rates, several mistakes were found in the original interim operating permit applications. The purpose of this letter is to correct these mistakes, provide accurate information on the maximum rates for certain processes within the mill and to set the record straight on the mill's overall capacity. This will allow our future discussions to have the same starting point.

Chapter 17-2.960(1)(a), FAC requires that the maximum capacity to emit TRS be included in the interim operating permits. In addition, at our meeting with you on October 6, 1987, you directed the industry representatives to amend existing interim operating permits to reflect maximum production rates as well as the maximum TRS emission rates. The maximum pulp production capacity is calculated below. The maximum TRS emission rates are shown on the attached pages which amend the original interim operating permit applications (page 4 of DER Form 17-1.101(1)).

Digester Pulp Production

The mill has 13 batch digesters. One digester will produce 14.08 machine dried (6% moisture) tons (MDT) of high yield pulp for

ADU
7:11
10/11

11-12-87

~~CHT~~
~~RE~~

FYI, I

have a copy for the
files. Steve has his
copy. District + local were
ced.

Slawson,

I have an X-tra copy.

Benn

Mr. Steve Smallwood
November 10, 1987
Page 2

each cook. Each cook requires 138 minutes to complete. The maximum pulp production can be calculated as follows:

$$(13 \text{ digesters}) \left(\frac{1440 \text{ Minutes}}{\text{day}} \right) \left(\frac{\text{cook}}{138 \text{ minutes}} \right) = 136 \frac{\text{cooks}}{\text{day}}$$

$$\left(\frac{136 \text{ cooks}}{\text{day}} \right) \left(\frac{14.08 \text{ MDT}}{\text{cook}} \right) = 1915 \frac{\text{MDT}}{\text{day}} \text{ pulp}$$

Based upon the mill's capacity as indicated above, we would now like to provide revised maximum capacities for the process emission sources regulated by the TRS Rule. The capacity of those process emission sources regulated by the TRS Rule are shown below:

Existing Recovery Boilers:

- #1 - 51,500 BLS/hr
- #2 - 65,900 BLS/hr
- #3 - 65,900 BLS/hr

Total - 183,300 BLS/hr or 4,400,000# BLS/day

Existing Smelt Tanks - Same as Recovery Boilers

Existing Digesters:

- 580,000# wood/hr @ 48% moisture
- 898,000# white & black liquor/hr

Existing Evaporators:

- #1 - 330,000#/hr @ 15% solids
- #2 - 450,000#/hr @ 15% solids
- #3 - 450,000#/hr @ 15% solids

Total - 1,230,000#/hr. or 29,520,000#/day @ 15% solids

Existing Lime Kilns:

- #1 - 24,000#/hr
- #2 - 24,000#/hr
- #3 - 32,000#/hr

Total - 80,000#/hr
or 1,920,000#/day

Mr. Steve Smallwood
November 10, 1987
Page 3

We are attaching the revised page from each original interim operating permit application for your convenience in revising the applications.

Attached is a copy of a letter from Mr. Terry Cole to Mr. Mark Zilberberg which provides details of an agreement negotiated by Mr. Cole with you and Mr. Zilberberg. We would expect that this agreement would be incorporated into the interim operating permits.

Also, we recognize the requirement to test the following sources to demonstrate compliance with their respective permitted particulates mass emission rates:

Recovery Boilers
Smelt Dissolving
Lime Kilns

These tests will be conducted as expeditiously as possible and in accordance with applicable requirements.

Please let us know if you have any questions regarding this information. We would be happy to meet with you and your staff to discuss any questions or concerns you may have.

Sincerely,

SEMINOLE KRAFT CORPORATION



T. Frank Lee
General Manager

ah

attachments

CC: Mr. Ernest Frey - Florida DER
Mr. Donald C. Bayly - BESD
Mr. Terry Cole
Mr. John Millican
Mr. Malcolm Williams
Mr. Mike Riddle
Mr. John McKinnon
Mr. Curt Barton

LIST OF ATTACHMENTS

Revised page 4 for Interim Operating Permit Applications
for the following sources:

1. No.1 Recovery Boiler
2. No.2 Recovery Boiler
3. No.3 Recovery Boiler
4. No.1 Smelt Dissolving Tank
5. No.2 Smelt Dissolving Tank
6. No.3 Smelt Dissolving Tank
7. No.1 & 2 Batch Digester System
8. No.1 Multi-effect Evaporator
9. No.2 Multi-effect Evaporator
10. No.3 Multi-effect Evaporator
11. No.1 Lime Kiln
12. No.2 Lime Kiln
13. No.3 Lime Kiln

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Black liquor (50%)	N/A	N/A	51,500	11

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 51,500 # BLS/hour (Dry)

2. Product Weight (lbs/hr): 27,000 #/hr Green liquor solids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulate	43.3	170	(a) 3#/3000# BLS	43.3	(b) 17,266,214	8634	11
TRS	9.2	40.3	17.5 ppm	9.2	7,135,135	3568	11

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) 17-2.600(4)

b) AP-42

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Black liquor (50%)	N/A	N/A	65,900	12

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 65,900 #BLS/hr (Dry)
2. Product Weight (lbs/hr): 34,532 #/hr Green liquor solids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulate	55.4	218	(a) 3#/3000# BLS	55.4	(b) 22,199,418	11,112	21
TRS	12.2	53.6	17.5 ppm	12.2	9,461,189	4,731	12

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) 17-2.600(4)
b) AP-42

No.3 Recovery Boiler

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Black liquor (50%)	N/A	N/A	65,900	13

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 65,900 #BLS/hour (dry)
- Product Weight (lbs/hr): 34,532 #/hr Green liquor solids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2 (a)	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulate	55.4	218	3#/3000#BLS	55.4	22,199,418	11,112	13
TRS	12.2	53.6	17.5 ppm	12.2	9,461,189	4,731	13

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).

- 17-2.600(4)
- AP-42

No.1 Smelt Dissolving Tank

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Molten Smelt	N/A	N/A	27,000	8

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 27,000 # Green liquor solids
- Product Weight (lbs/hr): 27,000 # Green liquor solids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulate	16.2	64	(a) 0.62 E=3.59P	16.2	(b) 575,501	288	
TRS	N/A		N/A	N/A	(c) 753,579	377	

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)(10)(b)

b) AP-42

c) EPA 450/2-78-003b $\frac{3.7 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{558 \text{ tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = \frac{753,579 \text{ lbs TRS}}{\text{year}} = \frac{377 \text{ tons}}{\text{year}}$

No.2 Smelt Dissolving Tank

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Molten Smelt	N/A	N/A	34,532	9

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 34,532 #Green liquor solids
- Product Weight (lbs/hr): 34,532 # Green Liquor solids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2 (a) 0.62	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulate	18.6	73	E=3.59P	18.6	739,987 (b)	370	
TRS		N/A	N/A	N/A	964,257 (c)	482	

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)(10)(b)
 b) AP-42
 c) EPA 450/2-78-003b

$$\frac{3.7 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{714 \text{ tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = \frac{964,257 \text{ lbs TRS}}{\text{year}} = \frac{482 \text{ tons}}{\text{year}}$$

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Molten smelt	N/A	N/A	34,532	10

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 34,532 # Green liquor solids
- Product Weight (lbs/hr): 34,532 # Green liquor solids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2 (a) 0.62	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulate	18.6	73	E=3.59P	18.6	739,987	370	
TRS	N/A		N/A	N/A	964,257	482	

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)(10)(b)

b) AP-42

c) EPA 450/2-78-003b

$$\frac{3.7 \text{ lbs}}{\text{ton pulp}} \times \frac{714 \text{ tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = \frac{964,257 \text{ lbs TRS}}{\text{year}} = \frac{482 \text{ tons}}{\text{year}}$$

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Wood Chips	N/A	N/A	580,000	21 & 22
Black & White liquor			898,000	
NOTE: AS NO.1 AND NO.2 BATCH DIGESTER SYSTEMS VARY IN PROPORTION TO TOTAL PROCESS RAW MATERIALS, THE FOLLOWING INFORMATION REPRESENTS THE TOTALS BOTH SYSTEMS UNDER AVERAGE OPERATING CONDITIONS.				

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 1,478,000 lbs/hr

2. Product Weight (lbs/hr): 165,583 lbs A.D. Pulp/hr

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
TRS	N/A	N/A	N/A	N/A	7,615,178	3808	21 & 22

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) EPA-450/2-78-003b

$$10.5 \text{ lbs TRS} \times \frac{1987 \text{ A.D. Tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = 7,615,178 \frac{\text{lbs TRS}}{\text{year}} = 3808 \frac{\text{tons}}{\text{year}}$$

No.1 Line Multi-effect evaporators

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
15% Black liquor	N/A	N/A	330,000	18

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 330,000 lbs/hr @ 15% solids

2. Product Weight (lbs/hr): 99,000 lbs/hr @ 50% solids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
TRS	N/A	N/A	N/A	N/A	1,225,634	613	18

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) EPA-450/2-78-003b

$$533 \frac{\text{tons pulp}}{\text{day}} \times 6.3 \frac{\text{lbTRS}}{\text{ton pulp}} \times \frac{365 \text{ days}}{\text{year}} = 1,225,634 \frac{\text{lbs TRS}}{\text{year}} = 613 \frac{\text{tons}}{\text{year}}$$

No.2 Line Multi-effect Evaporators

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
15% Black liquor	N/A	N/A	450,000	19

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 450,000 lbs/hr @ 15% solids
- Product Weight (lbs/hr): 135,000 lbs/hr @ 50% solids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
TRS	N/A	N/A	N/A	N/A	1,671,737	836	19

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).

EPA 450/2-78-003b

$$\frac{727 \text{ tons pulp}}{\text{day}} \times \frac{6.3 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{365 \text{ days}}{\text{year}} \times \frac{1,671,737 \text{ lbs TRS}}{\text{year}} = \frac{836 \text{ tons}}{\text{year}}$$

No.3 Line Multi-effect Evaporators

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
15% black liquor	N/A	N/A	450,000	20

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 450,000 lbs/hr @ 15% solids

2. Product Weight (lbs/hr): 135,000 lbs/hr @ 50% solids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
TRS	N/A	N/A	N/A	N/A	1,671,737	836	20

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).

$$\frac{727 \text{ tons pulp}}{\text{Day}} \times \frac{6.3 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{365 \text{ days}}{\text{year}} = \frac{1,671,737 \text{ lbs TRS}}{\text{year}} = 836 \frac{\text{tons}}{\text{year}}$$

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Lime Mud	N/A	N/A	24,000	14

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 24,000 lbs/hr (Dry basis)

2. Product Weight (lbs/hr): 12,200 lbs CaO/hr (Dry basis)

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulate	16	63	(a) 0.62 E=3.59P	16	(b) 8,212,500	4,106	14
Visible Emissions	N/A	N/A	10% opacity	N/A	N/A		14
TRS	N/A	N/A	N/A		(c) 913,668	457	14

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)(9)

b) AP-42
$$\frac{4.2 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{596 \text{ tons pulp}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = \frac{913,668 \text{ lbs TRS}}{\text{year}} = \frac{457 \text{ tons}}{\text{year}}$$

c) EPA 450/2-78-003b

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Lime Mud	N/A	N/A	24,000	15

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 24,000 lbs/hr (Dry basis)
- Product Weight (lbs/hr): 12,200 lbs CaO/hr (Dry basis)

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulate	16	63	(a) 0.62 E=3.59P	16	(b) 8,212,500	4,106	15
Visible Emissions	N/A		10% opacity	N/A	N/A		15
TRS	N/A		N/A		(c) 913,668	457	15

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)(9)

b) AP-42
$$\frac{4.2 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{596 \text{ tons pulp}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = \frac{913,668 \text{ lbs TRS}}{\text{year}} = \frac{457 \text{ tons}}{\text{year}}$$

c) EPA 450/2-78-003b

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Lime Mud	N/A	N/A	32,000	16

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 32,000 lbs/hour (Dry basis)

2. Product Weight (lbs/hr): 16,300 lbs CaO/hour (Dry Basis)

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulate	16	63	(a) 0.62 E=3.59P	16	(b) 8,212,500	4,106	16
Visible Emissions		N/A	10% Opacity	N/A	(c) N/A		16
TRS	N/A		N/A	N/A	1,218,735	609	16

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)(9)

b) AP-42

c) EPA 450/2-78-003b

$$\frac{4.2 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{795 \text{ tons pulp}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = \frac{1,218,735 \text{ lbs TRS}}{\text{year}} = \frac{609 \text{ tons}}{\text{year}}$$

LAW OFFICES
OERTEL & HOFFMAN
A PROFESSIONAL ASSOCIATION

COPY

KENNETH G. OERTEL
KENNETH F. HOFFMAN
SEGUNDO J. FERNANDEZ
TERRY COLE
HAROLD F. X. PURNELL
M. CHRISTOPHER BRYANT
W. DAVID WATKINS
MARTHA J. EDENFIELD
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WILLIAM E. POWERS, JR.

SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301
TELEPHONE (904) 877-0099

MAILING ADDRESS:
POST OFFICE BOX 6507
TALLAHASSEE, FLORIDA 32314-6507

November 5, 1987

Mr. Mark Zilberberg
Assistant General Counsel
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mark:

As you and Steve Smallwood suggested, I have redrafted language for the Seminole Kraft Corporation Interim Operating Permits. The language is to resolve the question of how capacity of an individual source should be specified in the permits. The provision was also to clarify the manner in which the capacity provision would be enforced. I therefore suggest the following language for insertion into the permit as a specific condition of the permit:

The maximum permitted capacity of this source is ___ pounds per hour. It is recognized that the source may operate for relatively brief periods of time above that level. Although testing will be accomplished at the specified permitted capacity, the source will not be subject to enforcement action for operating at levels above that, so long as the continuous emission monitors (CEMS) have been properly installed, certified, and are operating any time the source is operating above its maximum permitted capacity. The source must be able to demonstrate through the CEMS that the source was in compliance with the applicable rule. For sources requiring stack testing, testing will be performed at 90 to 100% of the specified maximum permitted capacity.

I hope that this satisfies the concerns which we addressed. I did not include the second higher level, although we can easily incorporate that into this suggestion. However, after working with the two level concept, it seemed clearer

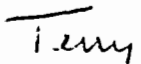
Mr. Mark Zilberberg
November 5, 1987
Page Two

than the three level concept we discussed. I believe that this version carries out the intent of both the Department and Seminole Kraft. It ensures that there is an incentive for the Company to keep it CEMS in good working order and to stay in compliance with the emission limitations, including any levels of operation above the maximum permitted capacity. On the other hand it ensures that the Department will not bring enforcement action against the source merely for operating over its maximum permitted capacity when it was otherwise meeting the emission limiting standard of the Department.

Should you have any comments on this, please let me know. If I come up with any further ideas, I will forward them to you. If it looks okay with you, please forward it to BESD and the District Office in Jacksonville. I would appreciate your copying me with that correspondence and letting me know what transpires.

We appreciate your and Steve's patience in meeting with us to discuss this so late into the evening.

Sincerely,


Terry Cole

TC:slt



Seminole Kraft Corporation

Jacksonville Mill

9469 Eastport Road
P.O. Box 26998
Jacksonville, Florida 32218-0998

DER

NOV 12 1987

904 751-6400

November 11, 1987

BAQM

Mr. Steve Smallwood, P.E.
Chief, Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

Subject: Construction Permits to comply with TRS Rule

Dear Mr. Smallwood:

Enclosed please find the Construction Permits required by FDER to allow Seminole Kraft to make improvements to certain TRS sources at our mill to come into compliance with the TRS Rule (Chapter 17-2.600(4)(c)). The following construction permits are included in this package:

- No.1 Dissolving Tank-AC 16-141794
- No.2 Dissolving Tank-AC 16-141795
- No.3 Dissolving Tank-AC 16-141796
- No.1 & 2 Batch Digester System-AC 16-141798
- No.1 Line Multi-Effect Evaporator-AC 16-141799
- No.2 Line Multi-Effect Evaporator-AC 16-141800
- No.3 Line Multi-Effect Evaporator-AC 16-141801
- No.1 Lime Kiln-AC 16-141790
- No.2 Lime Kiln-AC 16-141792
- No.3 Lime Kiln-AC 16-141793

Please note that the projects outlined in these applications will bring all regulated TRS sources at our mill into compliance with the TRS rule except the Recovery Boilers. As explained in our October 16, 1987 letter to Mr. Donald Bayly, which revised Seminole Kraft's TRS Conceptual Compliance Plan, we plan to replace our three (3) existing recovery boilers with one new recovery boiler. Hence, we will be submitting a construction permit for this new boiler some time prior to May 12, 1989. The new boiler will be a low-odor, NSPS boiler vs. three 1950's vintage boilers. This means that Seminole Kraft will ultimately control TRS emissions from its recovery boiler to 5 ppm rather

Mr. Steve Smallwood
November 11, 1987
Page 2

than the 17.5 ppm allowed for the existing three boilers. In the interim, Seminole will do its best to control TRS emissions from the existing boilers at the compliance limit that would be required otherwise. Our CEMS data indicate that we can do this almost all the time. Of course, we will continue to comply with the old TRS limit of 17.5 ppm based on compliance tests. As we have in the past, we anticipate meeting or bettering all applicable compliance dates and we do not anticipate filing any requests for variances or extensions of time.

We would also like to call your particular attention to the dissolving tank permit applications. As you know, our consent order, as well as our conceptual compliance plan, requires compliance with the smelt dissolving tank limits in the TRS rule by May 12, 1988. As noted on the conceptual compliance plan, to achieve that compliance date, we must start construction by March 1, 1988. Accordingly, it is imperative that DER issue the construction permits for the three dissolving tanks we are requesting today, prior to March 1, 1988.

Please let us know if you have any questions.

Sincerely,

SEMINOLE KRAFT CORPORATION



T. Frank Lee
General Manager

ah

attachments

CC: Mr. Ernest Frey - Florida DER
Mr. Donald C. Bayly - BESD
Mr. Terry Cole
Mr. John Millican
Mr. Malcolm Williams
Mr. Mike Riddle
Mr. John McKinnon
Mr. Curt Barton

Subsection 01

File Copy
Receipt # 76193
#9396
Pd. \$1000.00
AC 16-141790

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NOV 12 1987

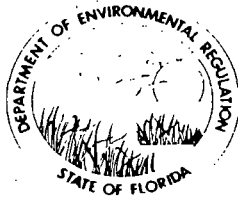
BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ERNEST E. FREY
DISTRICT MANAGER

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959



BAQM

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [] New¹ [X] Existing¹

APPLICATION TYPE: [X] Construction [] Operation [] Modification

COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) No.1 Lime Kiln

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.75 North 3365.60

Latitude 30° 25' 15"N Longitude 81° 36' 00"W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P.O. Box 26998 Jacksonville, FL 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corp.

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: [Signature]

T. Frank Lee, General Manager
Name and Title (Please Type)

Date: 11-11-87 Telephone No. (904) 751-6400

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

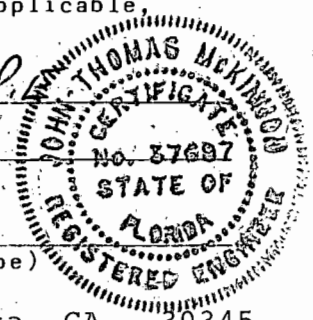
This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

430

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed John T. McKinnon, P.E.
John T. McKinnon P.E.
 Name (Please Type)
Stone Container Corporation
 Company Name (Please Type)
Suite 400
2150 Parklake Drive, Atlanta, GA 30345
 Mailing Address (Please Type)



Florida Registration No. 37697 Date: 11-11-87 Telephone No. (404) 621-6709

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

See Attachment A

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction Sept 12, 1988 Completion of Construction Sept 12, 1989

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Relocate #3 Mud Filter to #1 Lime Kiln - \$100,000

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Operating Permit A016-71212

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions.
(Yes or No).

1. Is this source in a non-attainment area for a particular pollutant? NA

a. If yes, has "offset" been applied? _____

b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. _____

3. Does the State "Prevention of Significant 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? NA

a. If yes, for what pollutants? _____

b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Lime Mud	NA	NA	24,000	14

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 24,000 lbs/hour (Dry Basis)
2. Product Weight (lbs/hr): 12,200 lbs. CaO/hr (Dry Basis)

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2 (a) 0.62	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulate	16	63	E=3.59P	16	8,212,500	4,106	14
Visible Emission		NA	10% Opacity (d)	NA		NA	
TRS		NA	20 ppm	NA	913,668	457	

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) 17.2650(2)(c)(9)

b) AP-42

c) EPA 450/2-78-003b

d) 17-2.600(4)(c)(5)

$$\frac{4.2 \text{ lb TRS}}{\text{ton pulp}} \times \frac{596 \text{ tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = 913,668 \frac{\text{lbs/TRS}}{\text{year}} = \frac{457 \text{ tons}}{\text{year}}$$

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Mud filter	TRS	*	NA	See attachments
* Will meet applicable emission limits				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
No.6 Fuel Oil	204 GPH	400 GPH	60

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: 2.27 Percent Ash: 0.048
 Density: 8.0 lbs/gal Typical Percent Nitrogen: 0.3
 Heat Capacity: 18,750 BTU/lb 150,000 BTU/gal
 Other Fuel Contaminants (which may cause air pollution): -

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average NA Maximum

G. Indicate liquid or solid wastes generated and method of disposal.

Dust recovered by the lime kiln scrubber is recycled back to kiln and water is used in liquor make up cycle.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 69.0 ft. Stack Diameter: 5.83 ft.
 Gas Flow Rate: 29,100 ACFM 16,180 DSCFM Gas Exit Temperature: 160 °F.
 Water Vapor Content: 35 % Velocity: 18 FPS

SECTION IV: INCINERATOR INFORMATION

NA

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack 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: _____

See attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Water is used in liquor make up cycle

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
See Section IIIA
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
See Section III C and Attachment A
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).
See Attachment A
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
See Attachment B
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
See Attachment C
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.
See attachment D & E

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

NA

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant

Rate or Concentration

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

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

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

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

NA

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.

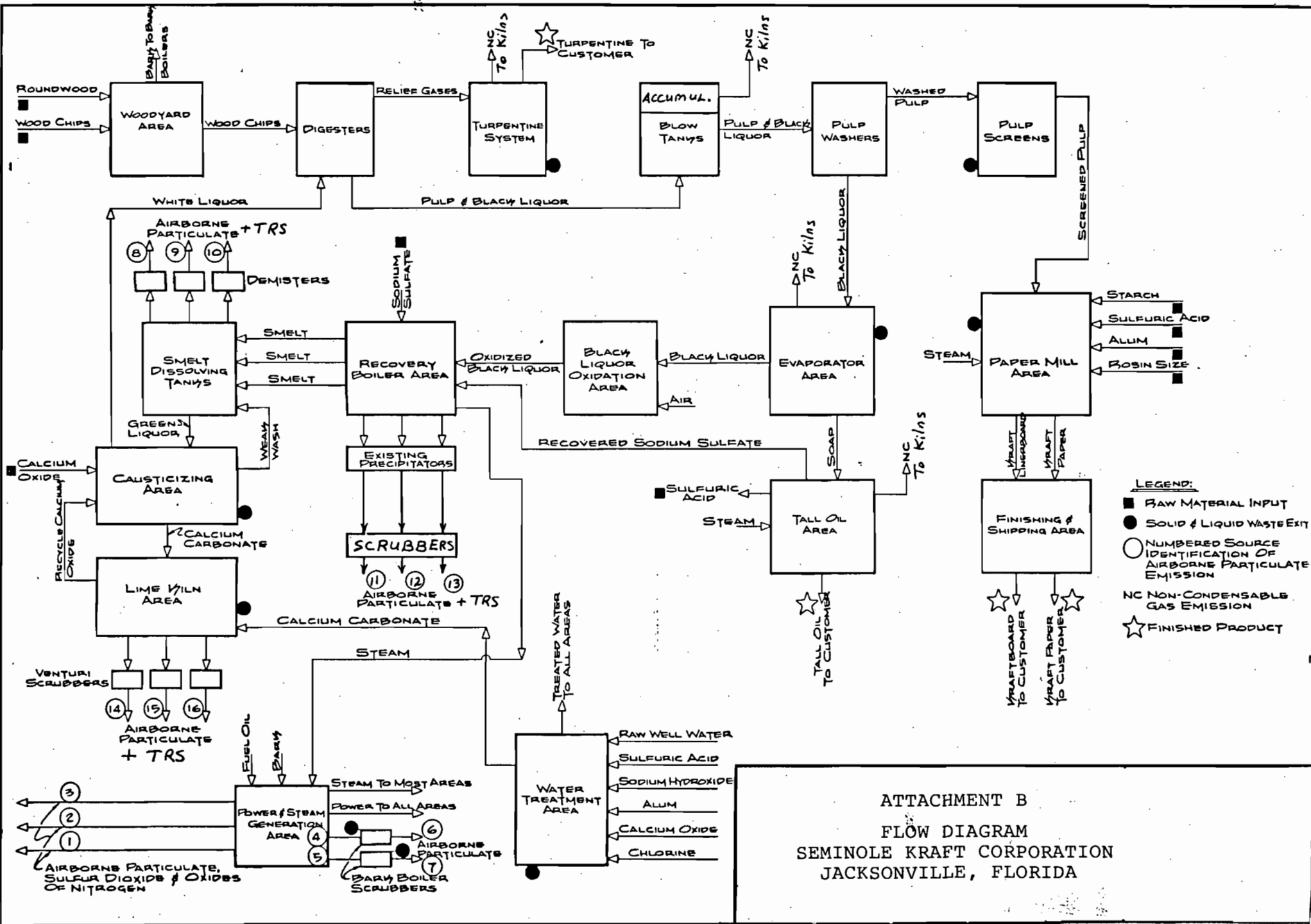
ATTACHMENT A

Lime Kiln No.1 Construction Permit Application

Lime Kiln No.1 is currently equipped with a lime mud filter and exit gas scrubber. The mud filter showers and scrubber make-up are supplied from the pulp mill hot condensate system (from the blow heat accumulators). The current mud filter on Lime Kiln No.1 is too small to provide adequate sulfide removal in order to meet the 20 ppm TRS limit in the Florida TRS rule. The hot condensate currently used occasionally is contaminated, causing intermittent spikes in TRS emissions.

This construction permit will cover the installation of a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up. The new filter will be an 8 foot diameter, 10 foot long filter (taken from Lime Kiln No.3) replacing the existing 6 foot diameter, 8 foot long filter. The larger filter will increase the filtering surface area by 66%, producing a lime kiln feed which is higher in solids and more even in moisture contents. The use of fresh water on the filter showers and scrubber make-up will eliminate the spikes of TRS due to contaminated condensate.

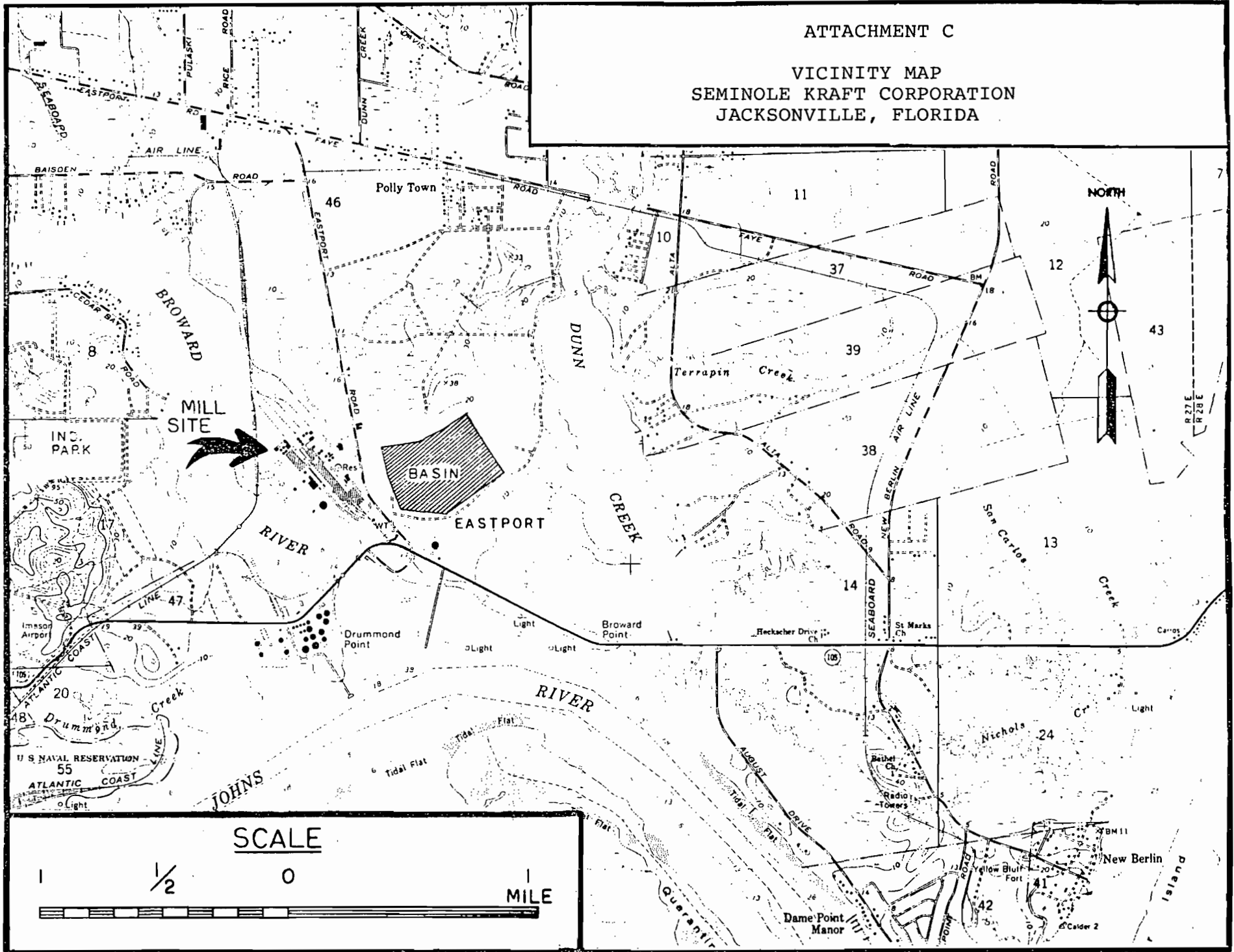
With the installation of this project, the emissions from Lime Kiln No.1 will meet the 20 ppm limit stipulated in the TRS rule.

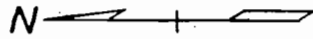


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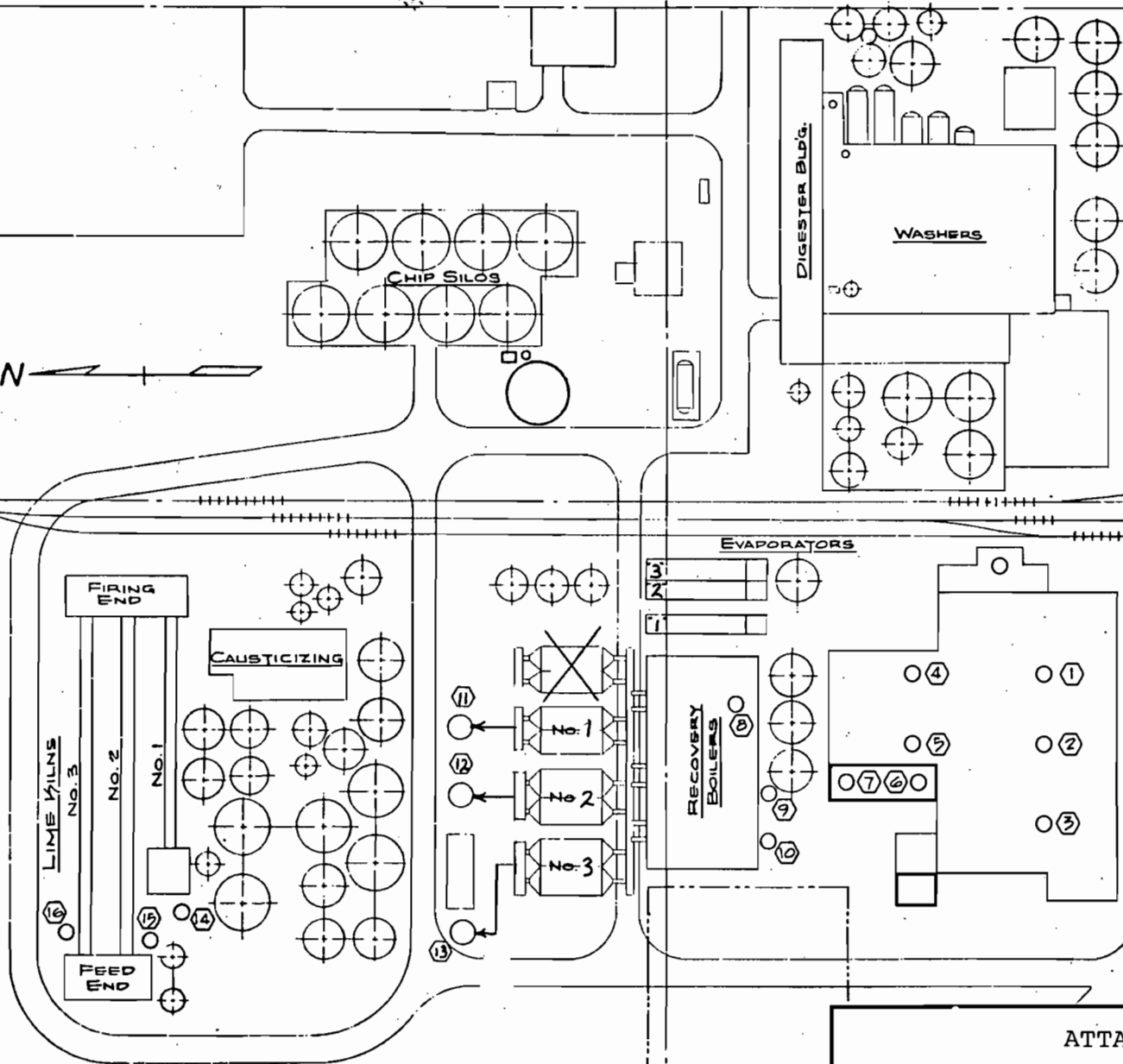
ATTACHMENT C

VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





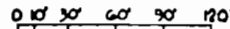
E-2000
BASE LINE



- 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

ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;
2. Execution of permit applications as required for operation of the corporation's facilities; and
3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: 

Vice President

Subcode 01

File Copy
Receipt # 16193
V# 9397
Pd. \$ 1000.00
AC 16-141792

STATE OF FLORIDA

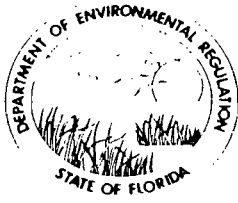
DEPARTMENT OF ENVIRONMENTAL REGULATION

DER

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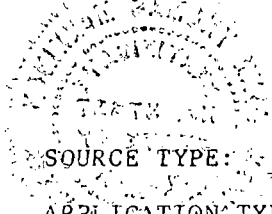
BAQM

BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER



NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959



APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [] New¹ [X] Existing¹

APPLICATION TYPE: [X] Construction [] Operation [] Modification

COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) #2 Lime Kiln

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.75 North 3365.60

Latitude 30° 25' 15" N Longitude 81° 36' 00" W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P.O. Box 26998 Jacksonville, Florida 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corp.

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: [Signature]

T. Frank Lee, General Manager
Name and Title (Please Type)

Date: 11-11-87 Telephone No. (904) 751-6400

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed John T. McKinnon

John T. McKinnon, P.E.

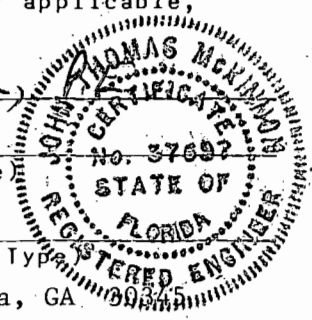
Name (Please Type)

Stone Container Corporation

Company Name (Please Type)

2150 Parklake Dr. Suite 400, Atlanta, GA

Mailing Address (Please Type)



Florida Registration No. 37697 Date: 11-11-87 Telephone No. (404) 621-6709

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

See Attachment A

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction Sept 12, 1988 Completion of Construction Sept. 12, 1989

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Replace Mud Filter - \$400,000

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Operating Permit - A016-71213

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

- 1. Is this source in a non-attainment area for a particular pollutant? NA
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
- 2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. _____
- 3. Does the State "Prevention of Significant 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? NA
- a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Lime Mud	NA	NA	32,000	15

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 32,000 lbs/hr (Dry Basis)
- Product Weight (lbs/hr): 16,300 # CaO/hr (Dry Basis)

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulate	16	63	(a) 0.62 E=3.59P	16	(b) 8,212,500	4,106	15
Visible Emissions		NA	10% Opacity (d)	NA	NA		
TRS		NA	20 ppm	NA	1,218,735	609	

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)(9)

b) AP-42

c) EPA 450/2-78-003b

d) 17-2.600(4)(c)(5)

DER Form 17-1.202(1)

$$\frac{4.2 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{795 \text{ tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = 1,218,735 \frac{\text{lbs TRS}}{\text{year}} = 609 \frac{\text{tons}}{\text{year}}$$

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Mud Filter	TRS	*	NA	See attachment A
* will meet applicable emission limits				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
No.6 Fuel Oil	292 GPH	400 GPH	60

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: 2.27 Percent Ash: 0.048
 Density: 8.0 lbs/gal Typical Percent Nitrogen: 0.3
 Heat Capacity: 18,750 BTU/lb 150,000 BTU/gal
 Other Fuel Contaminants (which may cause air pollution): -

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average NA Maximum

G. Indicate liquid or solid wastes generated and method of disposal.

Dust recovered by the scrubber is recycled back to Kiln. The water is used in
the liquor make up cycle.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 74.58 ft. Stack Diameter: 4.67 ft.
 Gas Flow Rate: 26,350 ACFM 16,321 DSCFM Gas Exit Temperature: 150 °F.
 Water Vapor Content: 29 % Velocity: 26 FPS

SECTION IV: INCINERATOR INFORMATION NA

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack 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: _____

See attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Water is used in the liquor make up cycle

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
See Section III A
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
See Section III C & Attachment A
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
See Section III C
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
See Attachment A
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
See Attachment A
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
See Attachment B
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.
See Attachment C

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

NA

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant

Rate or Concentration

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

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

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

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

NA

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.

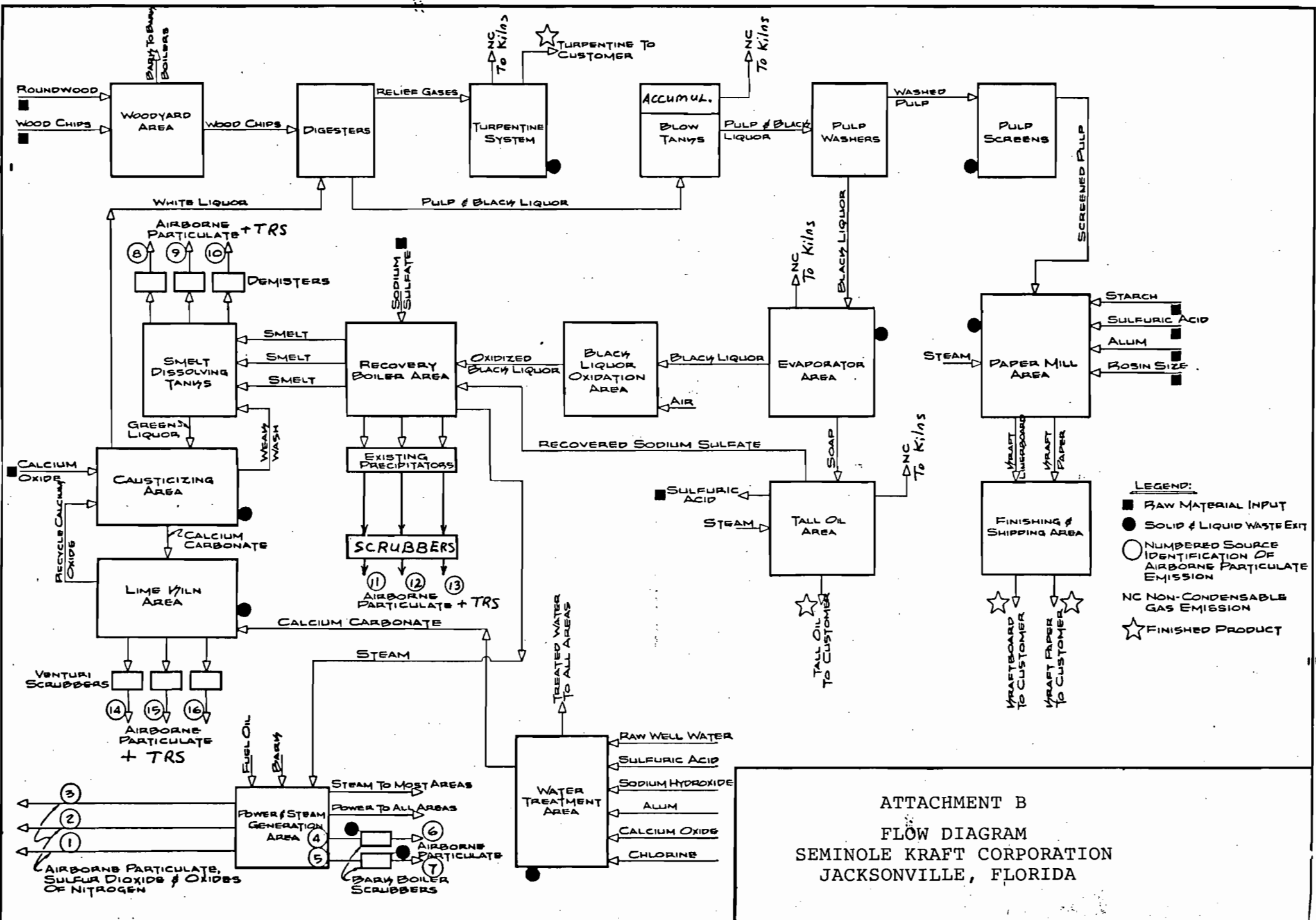
ATTACHMENT A

Lime Kiln No.2 Construction Permit Application

Lime Kiln No.2 is currently equipped with a mud filter and exit gas scrubber. The mud filter showers and scrubber make-up are supplied from the pulp mill hot condensate system (from the blow heat accumulators). The current mud filter on Lime Kiln No.2 is too small to provide adequate sulfide removal in order to meet the 20 ppm TRS limit in the Florida TRS rule. The hot condensate currently used occasionally is contaminated, causing intermittent spikes in TRS emissions.

This construction permit will cover the installation of a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up. The new filter will be an 10 foot diameter, 14 foot long filter (purchased new) replacing the existing 6 foot diameter, 8 foot long filter. The larger filter will increase the filtering surface area by 191%, producing a lime kiln feed which is higher in solids and more even in moisture contents. The use of fresh water on the filter showers and scrubber make-up will eliminate the spikes of TRS due to contaminated condensate.

With the installation of this project, the emissions from Lime Kiln No.2 will meet the 20 ppm limit stipulated in the TRS rule.



LEGEND:

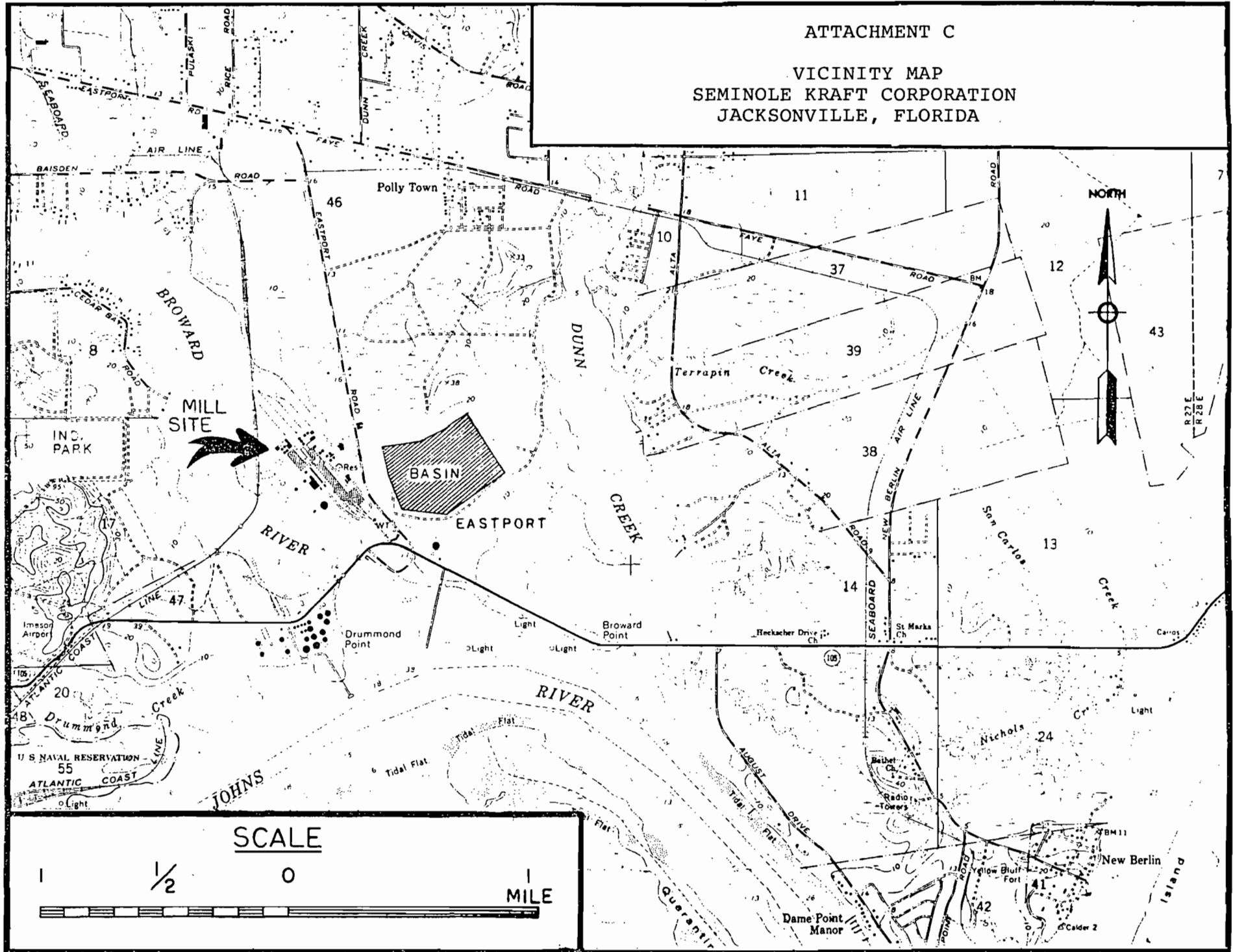
- RAW MATERIAL INPUT
- SOLID & LIQUID WASTE EXIT
- NUMBERED SOURCE IDENTIFICATION OF AIRBORNE PARTICULATE EMISSION
- NC NON-CONDENSABLE GAS EMISSION
- ☆ FINISHED PRODUCT

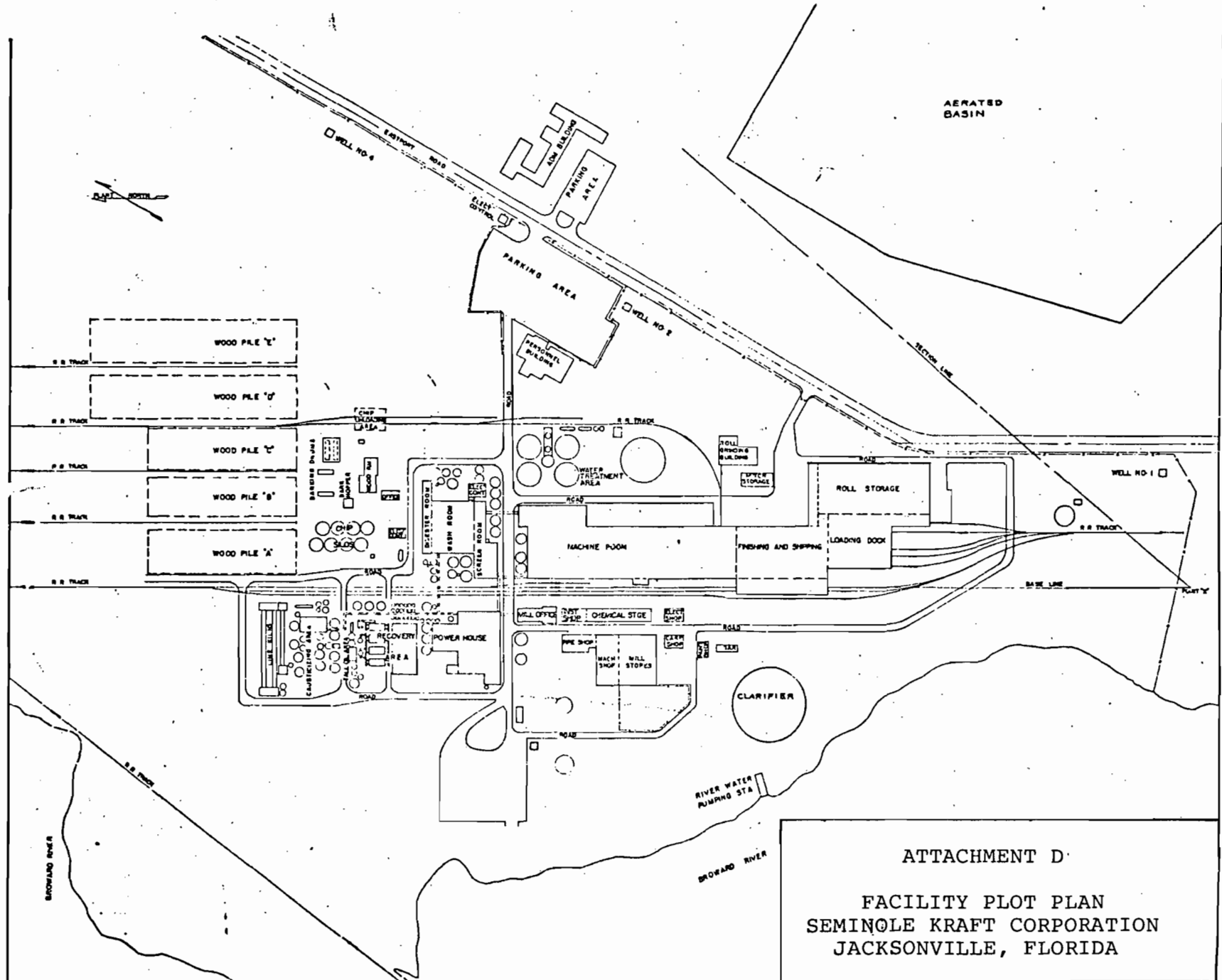
ATTACHMENT B
 FLOW DIAGRAM
 SEMINOLE KRAFT CORPORATION
 JACKSONVILLE, FLORIDA

Best Available Copy

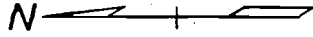
ATTACHMENT C

VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

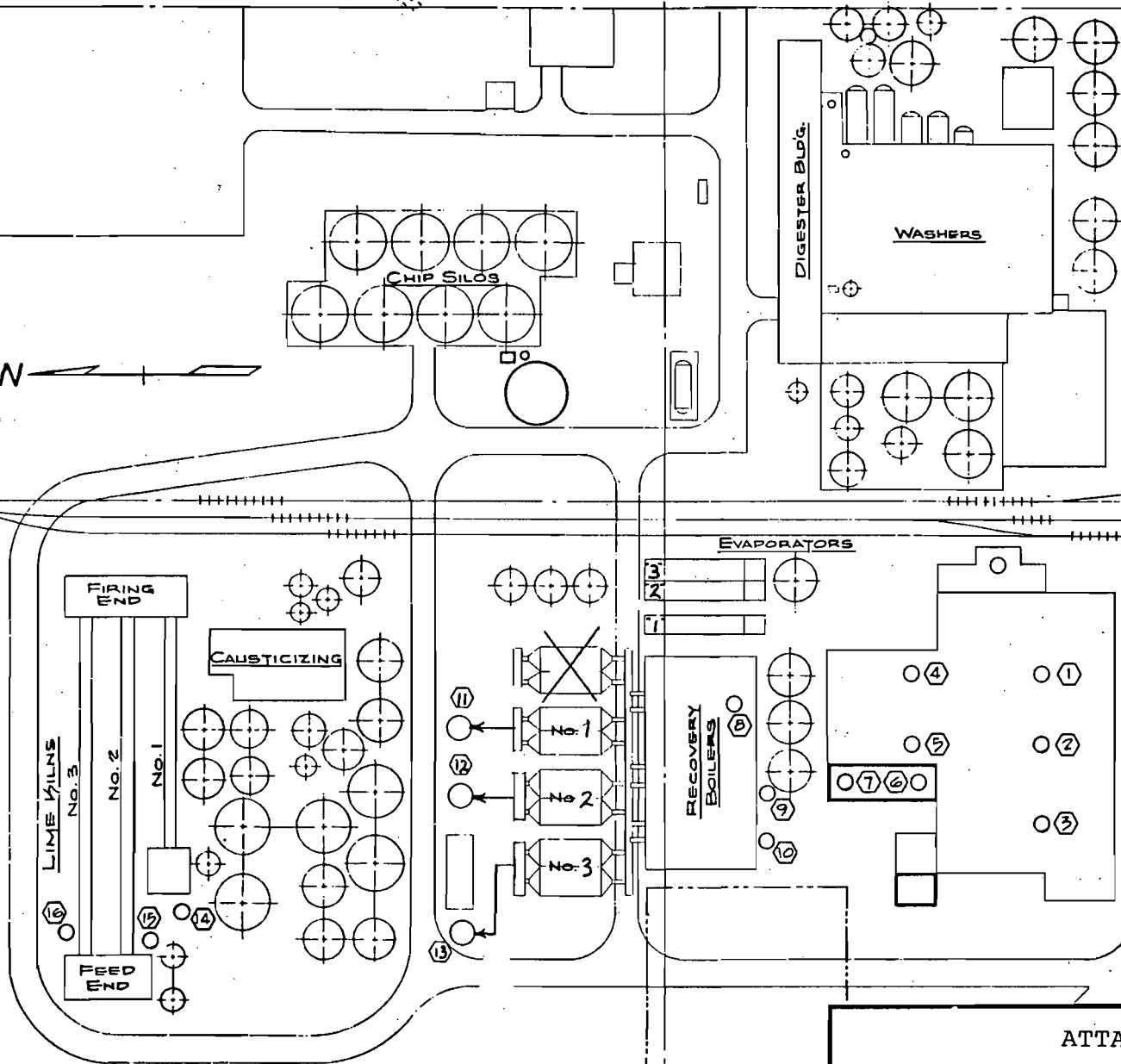




E-2750



E-2000
BASE LINE



- 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

ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

0 30 60 90 120'

E-1500

N:30°00

N:25°00

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;
2. Execution of permit applications as required for operation of the corporation's facilities; and
3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: 

Vice President

Subcode 01

File Copy
Receipt # 76193
9398
Pd. \$1000.00
16-141793

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

DER

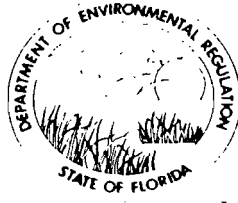
NOV 12 1987

BAQM

BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER

NORTHEAST DISTRICT

3426 HILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959



APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [] New¹ [X] Existing¹

APPLICATION TYPE: [X] Construction [] Operation [] Modification

COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) #3 Lime Kiln

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.75 North 3365.60

Latitude 30° 25' 15" N Longitude 81° 36' 00" W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P.O. Box 26998 Jacksonville, Florida 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corp.

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: [Signature]

T. Frank Lee, General Manager
Name and Title (Please Type)

Date: 11-11-87 Telephone No. (904)751-6400

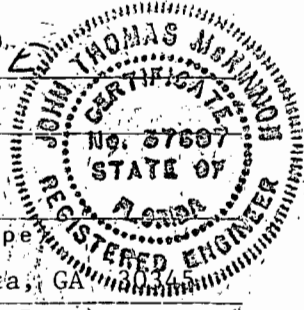
B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed John T. McKinnon, P.E.
John T. McKinnon, P.E.
Name (Please Type)
Stone Container Corporation,
Company Name (Please Type)
2150 Parklake Drive, Suite 400, Atlanta, GA
Mailing Address (Please Type)



Florida Registration No. 37697 Date: 11-11-87 Telephone No. (404) 621-6709

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

See attachment A

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction Sept 12, 1988 Completion of Construction Sept 12, 1989

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Replace Mud Filter - \$400,000

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Operating Permit A016-71214

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52; if power plant, hrs/yr _____; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions. (Yes or No).

- 1. Is this source in a non-attainment area for a particular pollutant? NA
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
- 2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. _____
- 3. Does the State "Prevention of Significant 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? NA
 - a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Lime Kiln	NA	NA	32,000	16

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 32,000 lbs/hr (Dry Basis)
- Product Weight (lbs/hr): 16,300 lbs CaO/hr (Dry Basis)

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulate	16	63	(a) E=3.59P 0.62	16	(b) 8,212,500	4,106	16
Visible Emissions		NA	10% Opacity (d)	NA	NA		
TRS		NA	20 ppm	NA	(c) 1,218,735	609	

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) 17-2.605(2)(c)(9)

b) AP-42

c) EPA 450/2-78-003b

d) 17-2.600(4)(c)(5)

$$\frac{4.2 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{795 \text{ tons}}{\text{day}} \times \frac{365 \text{ Days}}{\text{year}} = \frac{1,218,735 \text{ lbs TRS}}{\text{year}} = 609 \frac{\text{tons}}{\text{year}}$$

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Mud Filter	TRS	*	NA	See Attachment A
* Will meet applicable	emission limits			

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
No.6 Fuel Oil	289 GPH	400 GPH	60

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: 2.27 Percent Ash: 0.048
 Density: 8.0 lbs/gal Typical Percent Nitrogen: 0.3
 Heat Capacity: 18,750 BTU/lb 150,000 BTU/gal
 Other Fuel Contaminants (which may cause air pollution): -

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average NA Maximum

G. Indicate liquid or solid wastes generated and method of disposal.

Dust recovered by the seflubber is recycled back to kiln. The water is used in the liquor make up cycle.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 75.25 ft. Stack Diameter: 3.67 ft.
 Gas Flow Rate: 22,275 ACFM 14,189 DSCFM Gas Exit Temperature: 150 °F.
 Water Vapor Content: 26 % Velocity: 35 FPS

SECTION IV: INCINERATOR INFORMATION

NA

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack 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: _____

See Attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Water is used in the liquor make up cycle.

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
See Section III A
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
See Section III C and Attachment A
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
See Section III C
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
See Attachment A
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
See Attachment B
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
See Attachment C
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.
See Attachments D & E

- 9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
- 10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY NA

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

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

NA

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.

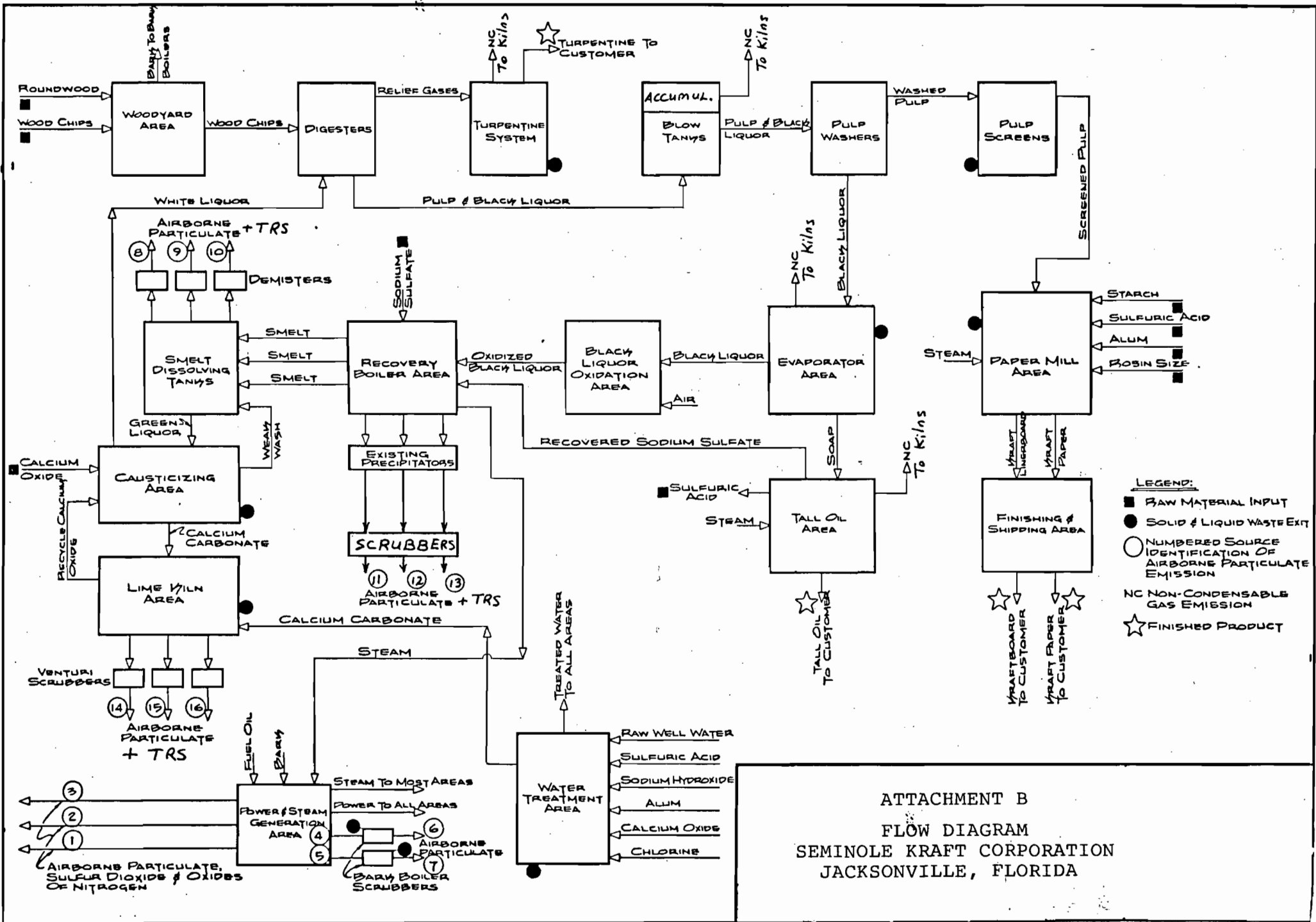
ATTACHMENT A

Lime Kiln No.3 Construction Permit Application

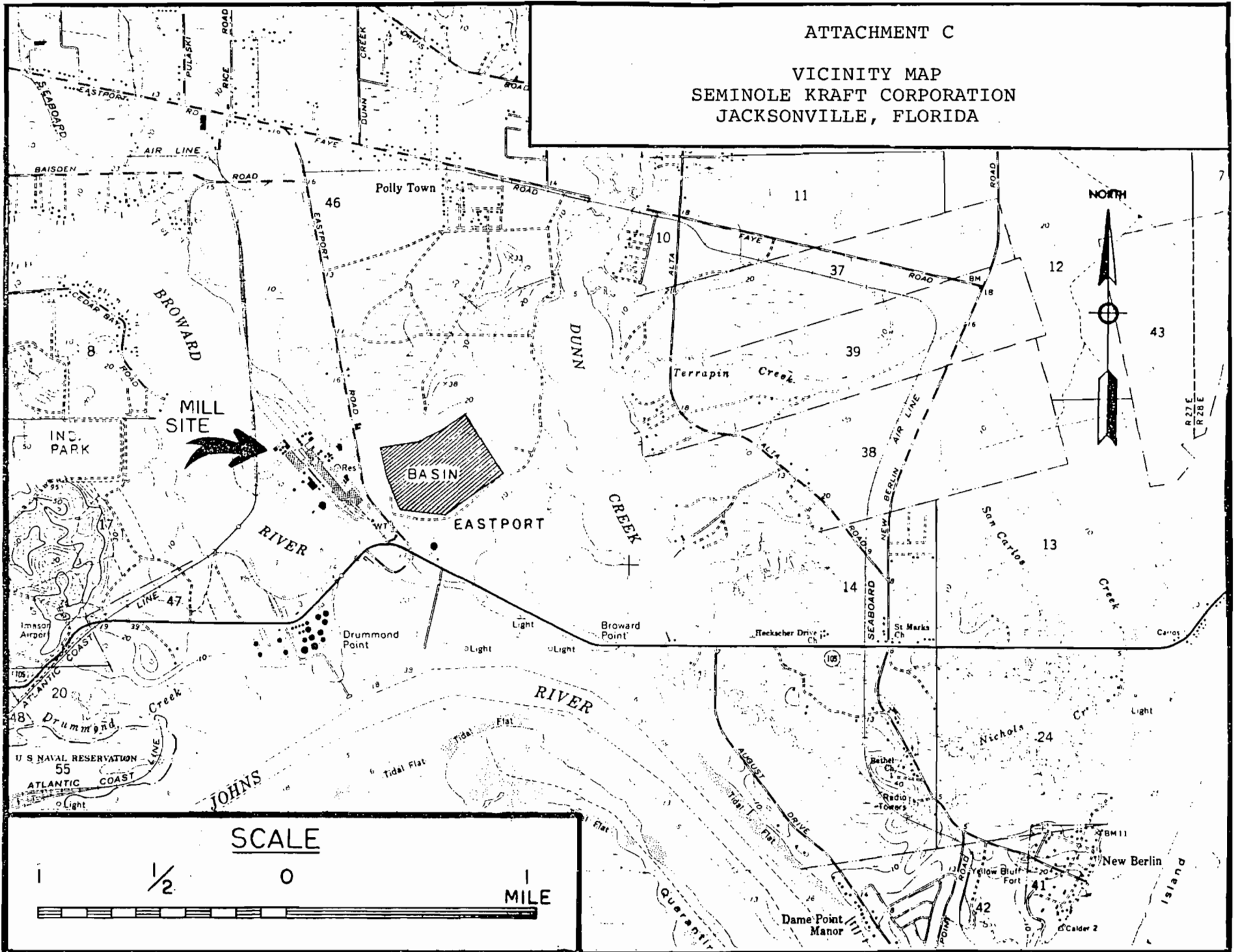
Lime Kiln No.3 is currently equipped with a mud filter and exit gas scrubber. The mud filter showers and scrubber make-up are supplied from the pulp mill hot condensate system (from the blow heat accumulators). The current mud filter on Lime Kiln No.3 is too small to provide adequate sulfide removal in order to meet the 20 ppm TRS limit in the Florida TRS rule. The hot condensate currently used occasionally is contaminated, causing intermittent spikes in TRS emissions.

This construction permit will cover the installation of a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up. The new filter will be an 10 foot diameter, 14 foot long filter (purchased new) replacing the existing 8 foot diameter, 10 foot long filter. The larger filter will increase the filtering surface area by 75%, producing a lime kiln feed which is higher in solids and more even in moisture contents. The use of fresh water on the filter showers and scrubber make-up will eliminate the spikes of TRS due to contaminated condensate.

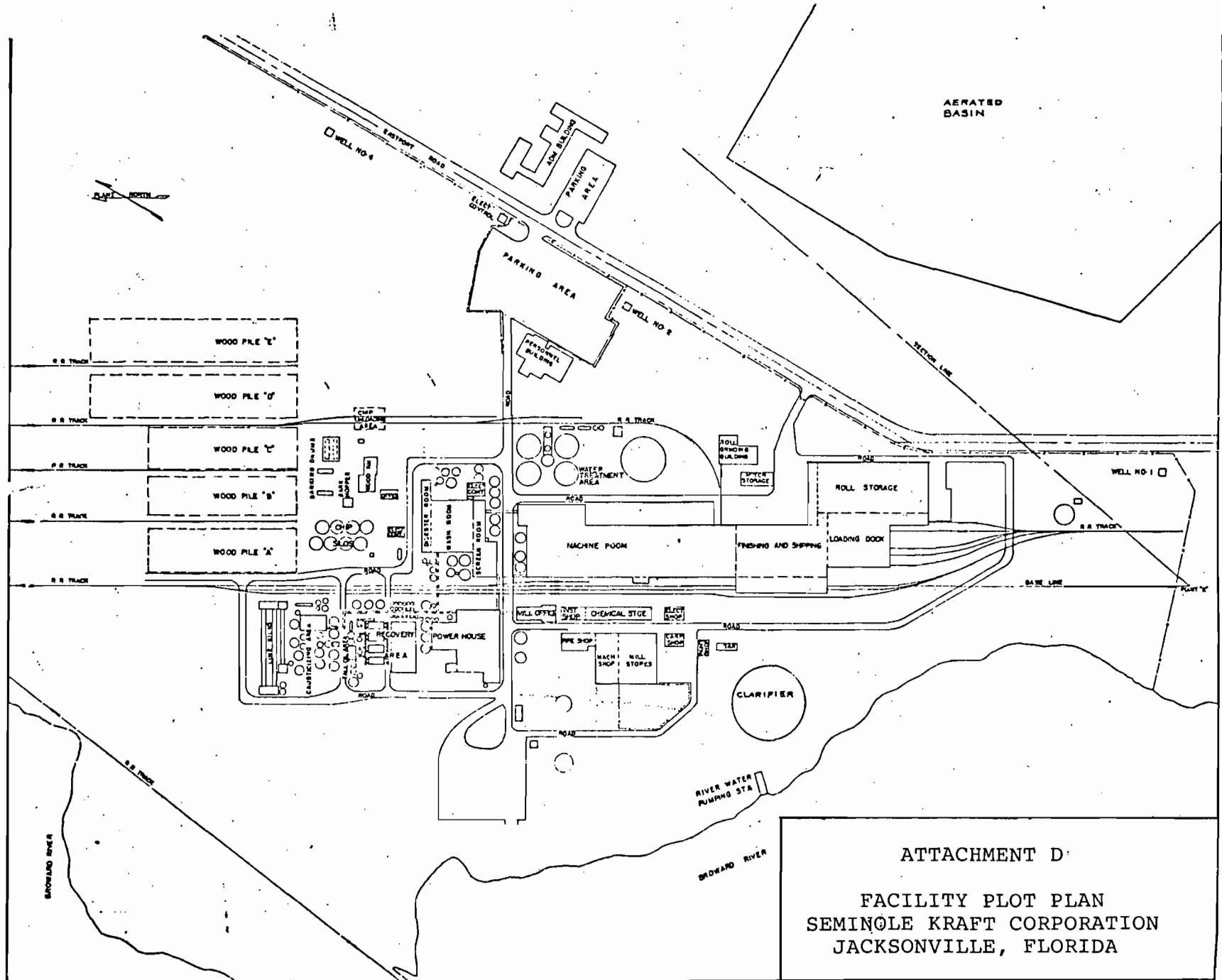
With the installation of this project, the emissions from Lime Kiln No.3 will meet the 20 ppm limit stipulated in the TRS rule.



ATTACHMENT B
 FLOW DIAGRAM
 SEMINOLE KRAFT CORPORATION
 JACKSONVILLE, FLORIDA



Best Available Copy



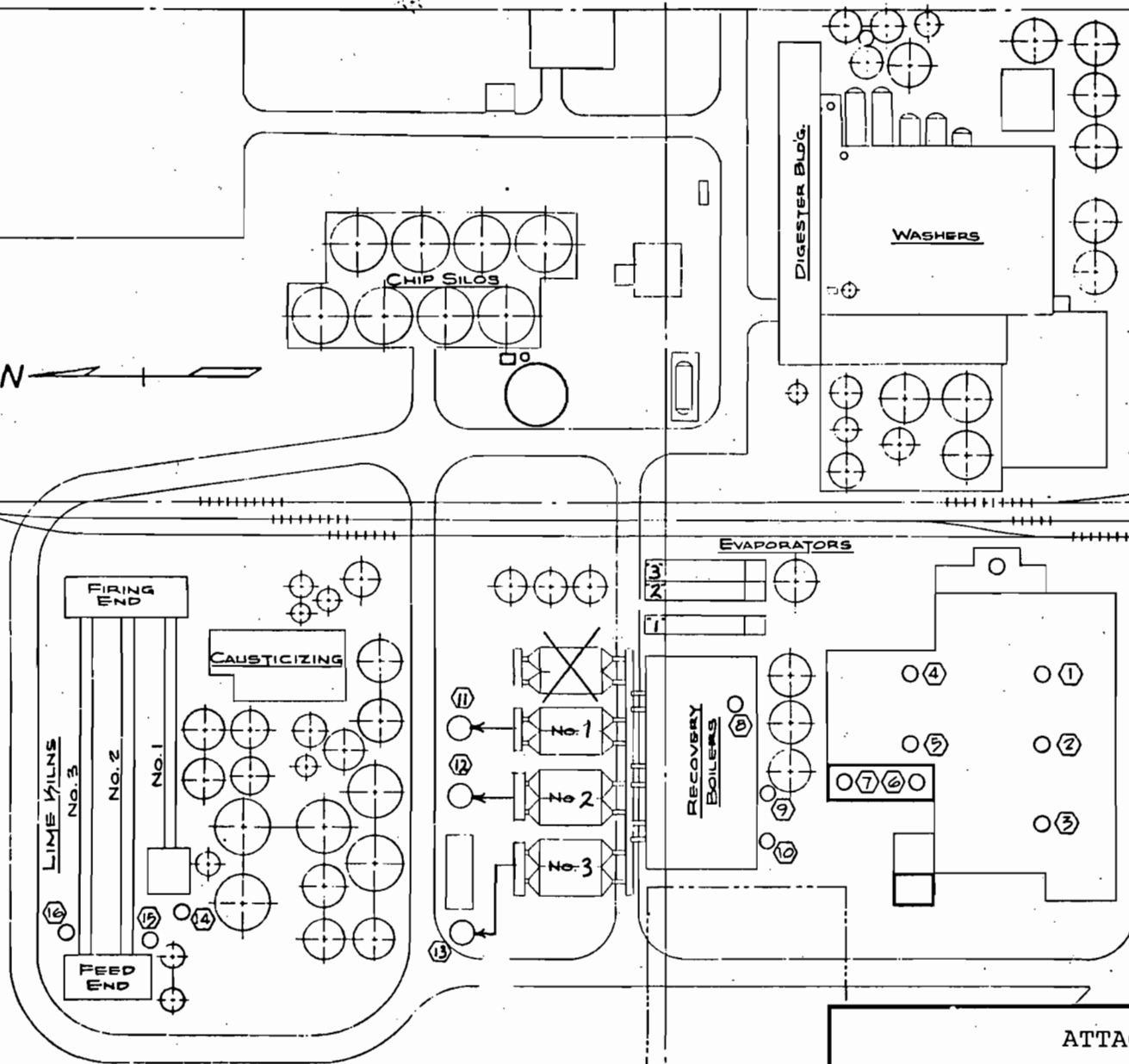
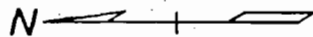
E-2250

E-2000
BASE LINE

N:30+00

N:25+00

0 15 30 60 90 120'



- 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
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ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;
2. Execution of permit applications as required for operation of the corporation's facilities; and
3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

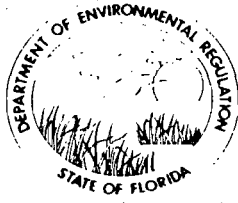
By: 

Vice President

Final check 01

file copy
Receipt # 46193
V # 9392
Pd. \$1000.00
AC 16-141798

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



NOV 12 1987

BAQM

BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
ERNEST L. FREY
DISTRICT MANAGER

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [] New¹ [x] Existing¹

APPLICATION TYPE: [x] Construction [] Operation [] Modification

COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime #1 and Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) #2 Batch Digester System

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville

UTM: East 7441.75 North 3365.60

Latitude 30 ° 25 ' 15 "N Longitude 81 ° 36 ' 00 "W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P. O. Box 26998, Jacksonville, Florida 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corporation

I certify that the statements made in this application for a construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: [Signature]
T. Frank Lee, General Manager
Name and Title (Please Type)

Date: 11/11/87 Telephone No. 904/751-6400

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

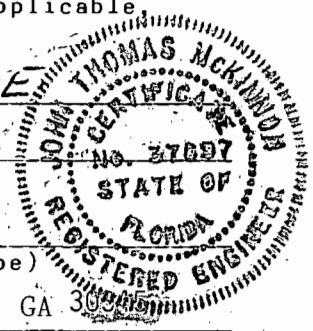
This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

430

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed John T. McKinnon, P.E.
 John T. McKinnon, P.E.
 Name (Please Type)
 Stone Container Corporation
 Company Name (Please Type)
 Suite 400, 2150 Parklake Dr., Atlanta, GA 30328
 Mailing Address (Please Type)



Florida Registration No. 37697 Date: 11/11/87 Telephone No. 404/621-6709

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

See Attachment A

B. Schedule of project covered in this application (Construction Permit Application Only)
 Start of Construction May 12, 1988 Completion of Construction November 12, 1988

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

NCG System Upgrade	- \$65,000
Computer Control System	- \$1,985,000
Total	\$1,250,000

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.
Draft Interim Operating Permit - A016-116140

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions. NA
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? _____
a. If yes, has "offset" been applied? _____
b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? _____
If yes, see Section VI. _____

3. Does the State "Prevention of Significant 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? no

a. If yes, for what pollutants? _____

b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Wood Chips	NA	NA	580,000	21 & 22
Black & White Liquor			898,000	
Note: As No. 1 and No. 2 Batch digester systems vary in proportion to total process raw materials, the following information represents the totals of both systems under average operating conditions.				

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 1,478,000 lbs./hr
2. Product Weight (lbs/hr): 165,583 16 A.D. Pulp/hr.

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
TRS	NA - Incinerated		in lime kilns		7,615,178	3808	21 & 22

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).

EPA - 450/2-78-003 b

$$10.5 \text{ lbs. TRS} \times \frac{1987 \text{ A.D. Tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = 7,615,178 \frac{\text{Lbs TRS}}{\text{year}}$$

$$= 3808 \frac{\text{tons}}{\text{year}}$$

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Incineration in	TRS	~ 100%	NA	See attachment A
Lime Kiln				

E. Fuels NA

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating. NA

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Nothing from digester system is intentionally wasted. Small amounts of fiber and black liquor are inadvertently lost in process. These materials are treated by an on-site NPDES waste treatment system. Sludge from waste treatment system is disposed in on-site landfill.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: See LimeKiln ft. Stack Diameter: _____ ft.
 Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.
 Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION NA

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack 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: _____
See Attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):
NA

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
See Section III A
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
See Section III C and Attachment A
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
See Section III C
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
See Attachment A
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
See Attachment A
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
See Attachment B
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
See Attachment C
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.
See Attachments D & E

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY NA

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant

Rate or Concentration

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

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

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

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 NA

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.

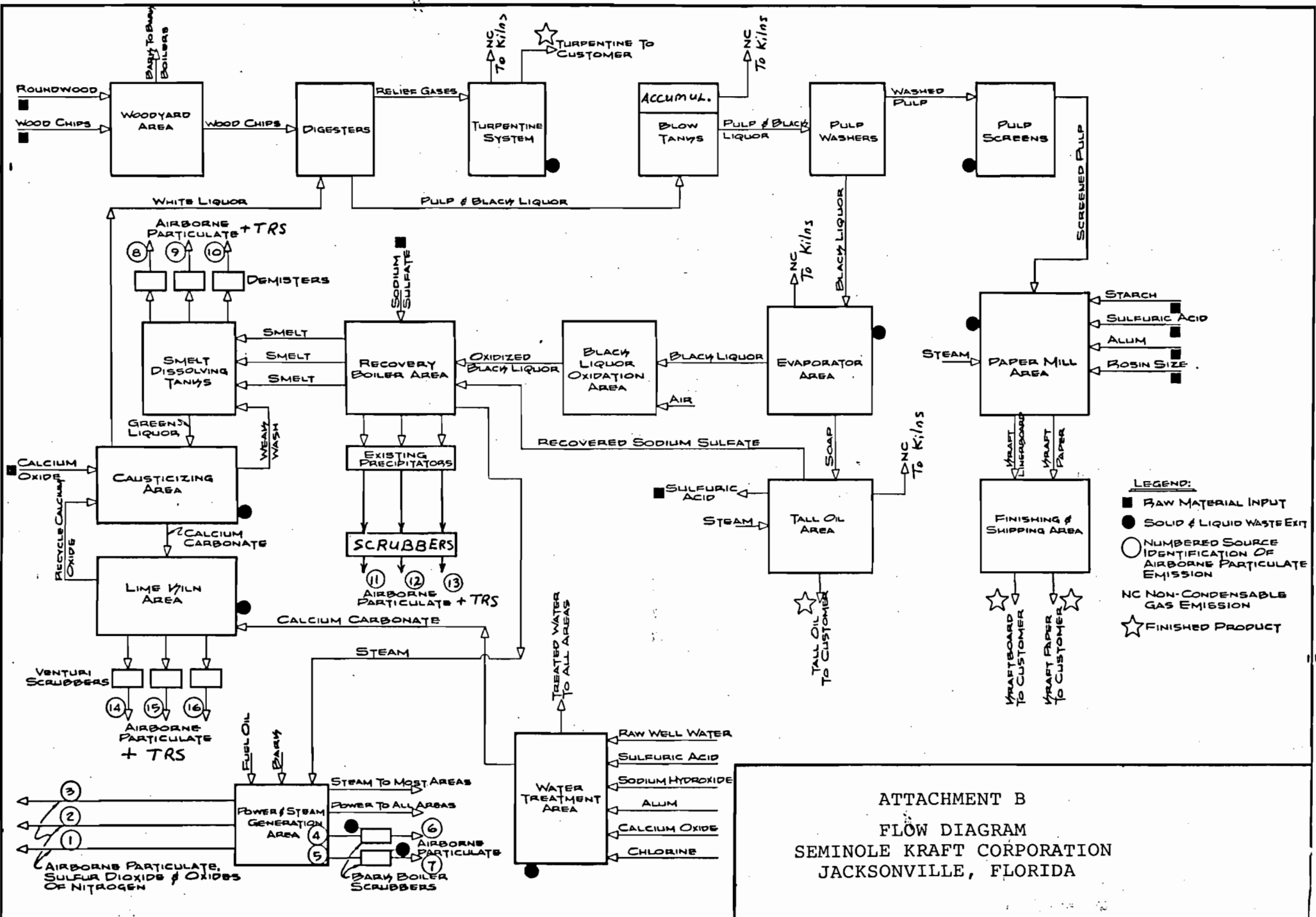
ATTACHMENT A

No.1 and 2 Batch Digester Systems Construction Permit Application

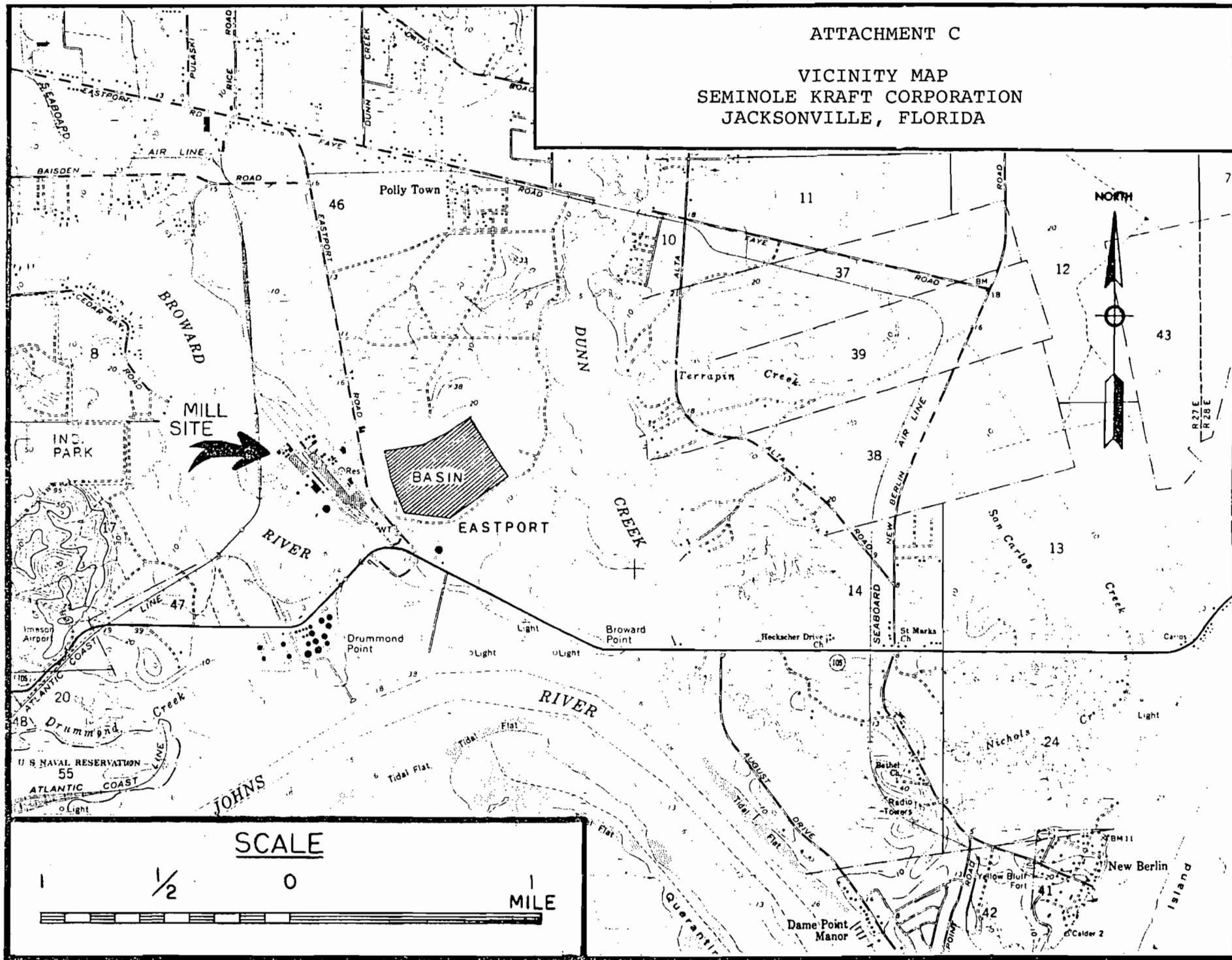
TRS emissions from No.1 and 2 Batch Digester Systems are currently controlled by collection in an existing non-condensable gas (NCG) system and incineration in either of No.2 or No.3 Lime Kilns. The use of lime kilns to achieve complete destruction of TRS compounds is a recognized technology that is well documented. As stated in EPA 4450/3-83-017, "Review of New Source Performance Standards for Kraft Pump Mills", incineration in lime kilns adequately achieves the 1200 F and 0.5 second retention time required to completely destroy TRS compounds. This is because a temperature of 1200 F or above is necessary to calcine the lime mud to CaO, and lime kilns (such as Seminole's) typically have at least two to three seconds of retention time. EPA further recognized this fact in their reviews of the standards for pulp mills (49 FR 2452 and 51 FR 18538), and deleted the requirement to monitor the lime kiln temperatures. Thus, it is appropriate to assume 100% destruction of all TRS compounds collected from No.1 and 2 Digester Systems by the NCG System using incineration in lime kiln No.2 or 3.

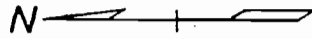
This construction permit covers installation of a pulp mill computer control system and an upgrade of the existing NCG System. A computer control system will be installed in the pulp mill digester area to control and sequence the digester cooks and blows. This system will smooth out the flows of non-condensable gasses into the NCG system and will control the venting from the pressure relief valves on the blow tanks and blow heat accumulators. The NCG System upgrade will consist of piping changes at the inlet of the induced draft fan to prevent condensate from entering the fan. This will improve fan reliability and eliminate condensate in the combustion air to the kilns, improving combustion control.

The equipment installed under this construction permit will allow the digester systems to comply with the Florida TRS rule.

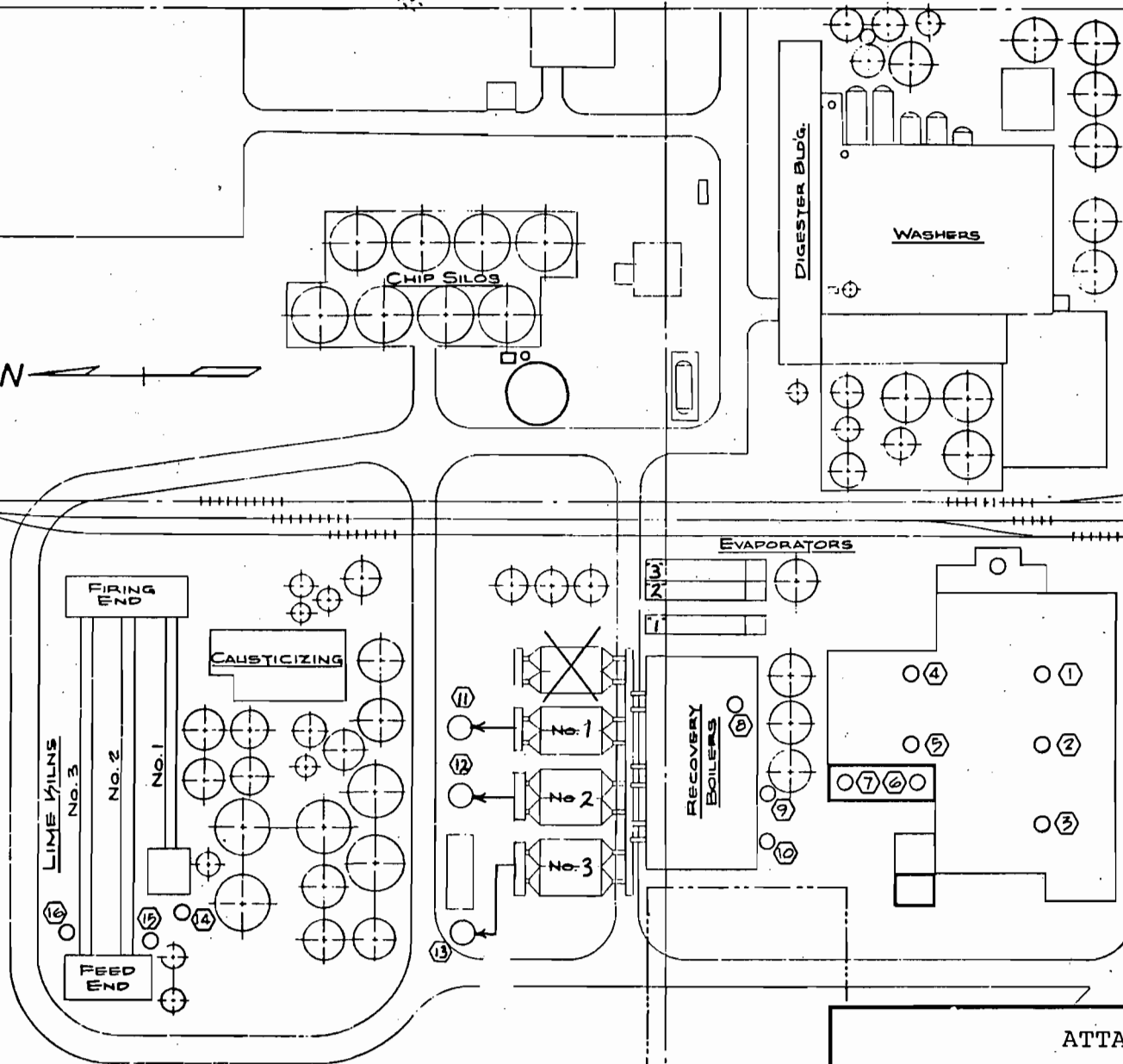


ATTACHMENT B
 FLOW DIAGRAM
 SEMINOLE KRAFT CORPORATION
 JACKSONVILLE, FLORIDA

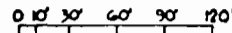




E-2000
BASE LINE



- 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



ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;
2. Execution of permit applications as required for operation of the corporation's facilities; and
3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: 

Vice President

Subcode 01

File Copy
Receipt 76193
V# 9393
Pd. \$1000.00
AC 16-141799

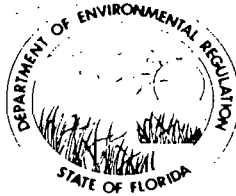
STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

DER

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959



NOV 12 1987

BAQM

BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [] New¹ [x] Existing¹

APPLICATION TYPE: [x] Construction [] Operation [] Modification

COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired)#1 Line Multi-Effect

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville
Evaporators

UTM: East 7441.75 North 3365.60

Latitude 30 ° 25 ' 15 "N Longitude 81 ° 36 ' 00 "W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P. O. Box 26998, Jacksonville, Florida 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corporation

I certify that the statements made in this application for a construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed:

T. Frank Lee, General Manager
Name and Title (Please Type)

Date: 11/11/87 Telephone No. 904/751-6400

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

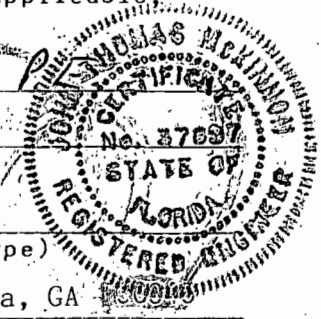
This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

DER

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
 John T. McKinnon, P.E.
 Name (Please Type)
 Stone Container Corporation
 Company Name (Please Type)
 Suite 400, 2150 Parklake Drive; Atlanta, GA
 Mailing Address (Please Type)



Florida Registration No. 37697 Date: 11/11/87 Telephone No. 404/621-6709

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

See attachment A

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction complete Completion of Construction complete

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Hotwell covers and vent stack tie-in - \$30,000

(cost covers all three lines)

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Draft Interim Operating Permit - A016-116141

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions. NA
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? _____
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. _____
3. Does the State "Prevention of Significant 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? NA
- a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
15% Black Liquor	NA	NA	330,000	18

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 330,000 lbs/hr @ 15% solids
- Product Weight (lbs/hr): 99,000 #/hr @ 50% solids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual I/yr			lbs/yr	T/yr	
TRS	NA - Incinerated		in lime kilns		1,225,634	613	18

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).

EPA - 450/2-78-003b

$$\frac{533 \text{ tons Pulp}}{\text{day}} \times \frac{6.3 \text{ lbs. TRS}}{\text{ton pulp}} \times \frac{365 \text{ days}}{\text{year}} = 1,225,634 \frac{\text{lbs. TRS}}{\text{year}} = \frac{613 \text{ tons}}{\text{year}}$$

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Incineration in lime kiln	TRS	~ 100%	NA	See Attachment A

E. Fuels NA

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis: NA

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Clean condensate to boiler feedwater. Contaminated condensate
from hotwell to sewer for treatment in aeration basin.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: See Lime Kiln ft. Stack Diameter: _____ ft.
 Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.
 Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION NA

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____
 Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____
 Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____
 Manufacturer _____
 Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack 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: _____

See Attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Contaminated condensate from hot well to sewer for treatment in
aeration basin. Clean condensate returned to boiler feed water.

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
See Section III A
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
See Section III C and Attachment A
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
See Section III C
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
See Attachment A
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
See Attachment A
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
See Attachment B
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
See Attachment C
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.
See Attachments D & E

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY NA

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

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

NA

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.

ATTACHMENT A

No.1 Line Multiple-Effect Evaporator Construction Permit Application

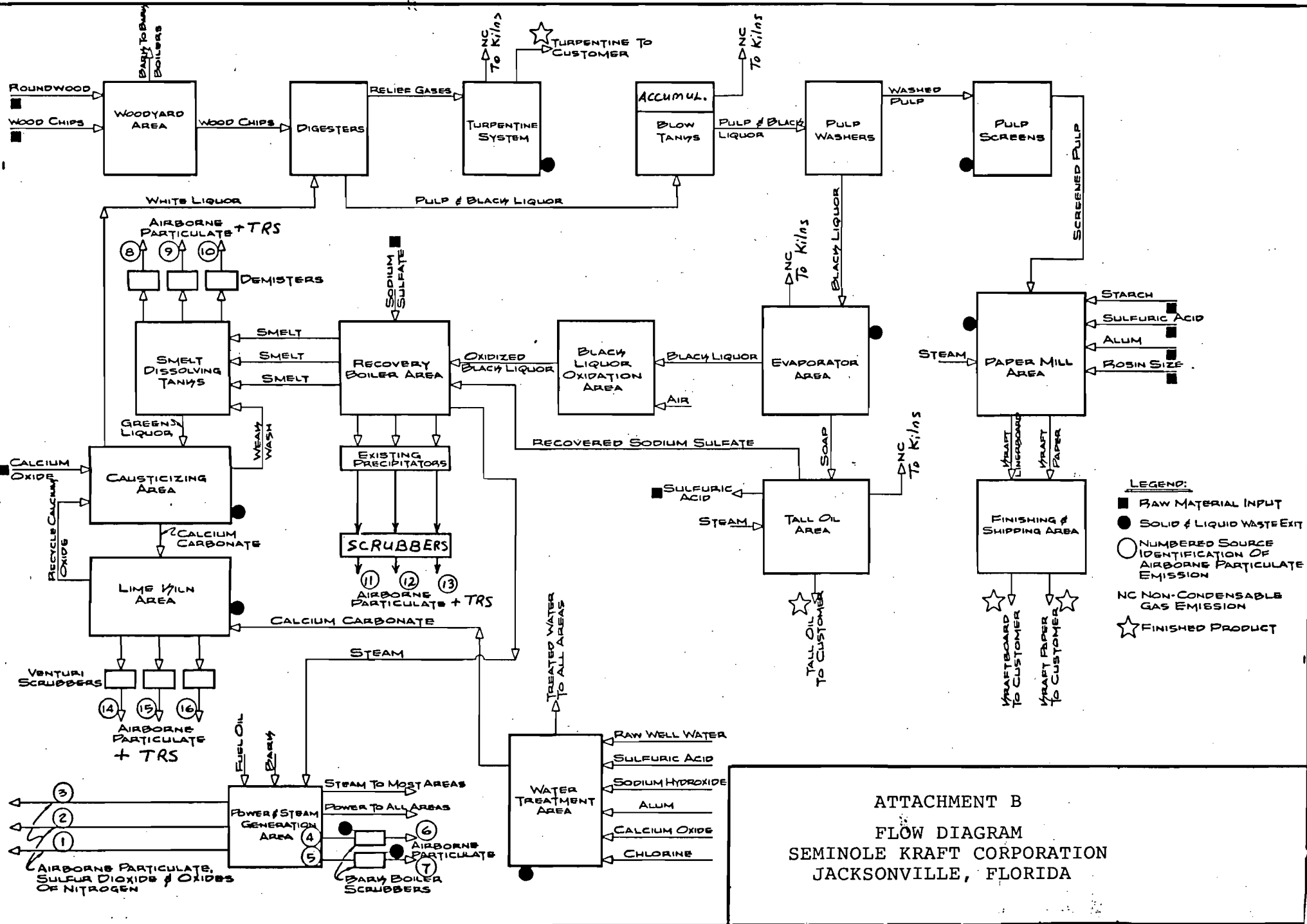
TRS emissions from multiple-effect evaporators are emitted from the condensate hotwells. The hotwell on No.1 Line multiple-effect evaporator was previously open to the atmosphere with no control of TRS.

This construction permit will cover the installation of a stainless steel sheet metal cover on the hotwell with a stack connected to the existing non-condensable gas collection (NCG) system. The cover and stack were installed first in order to analyze the TRS emissions. This was necessary to determine if the mass emission rate of TRS could safely be introduced into the NCG system for incineration in the lime kilns. The data indicated that this was feasible. Then, with the consent of Mr. Jerry Wosley of the Jacksonville BESD, the hotwell stack was tied into the NCG system (along with the hotwells from Numbers 2 and 3 lines multiple-effect evaporators) for a full-scale trial. The piping was installed in a manner which would allow it to be a permanent installation if the trial was successful.

The trial demonstrated that the TRS gasses from all three lines of multiple-effect evaporators may safely be collected in the existing NCG system and incinerated in the lime kilns. Therefore, this construction permit application is to cover the existing installation which is currently in operation.

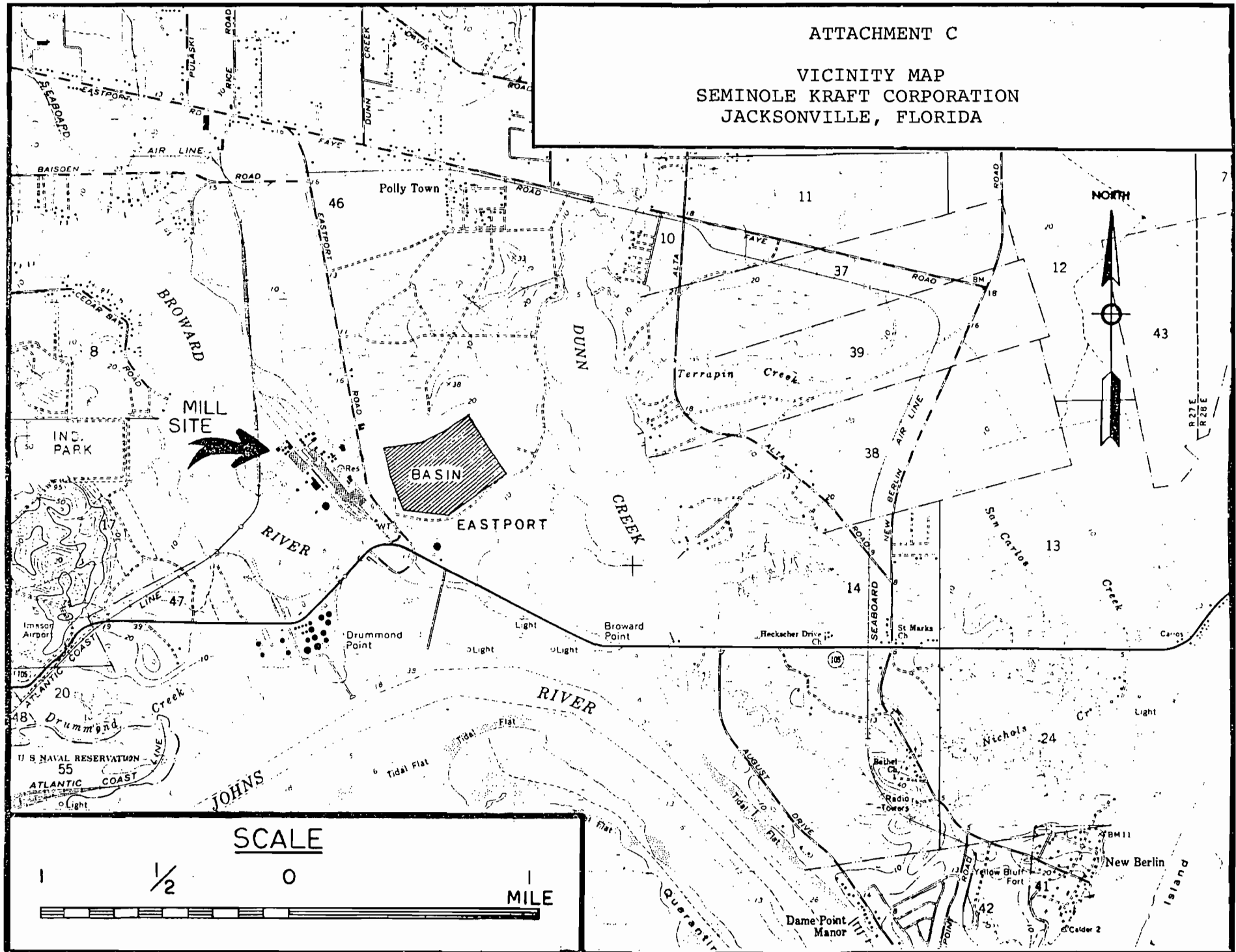
The use of lime kilns to achieve complete destruction of TRS compounds is a recognized technology that is well documented. AS stated in EPA 450/3-83-017, "Review of New Source Performance Standards for Kraft Pulp Mills", incineration in lime kilns adequately achieves the 1200^oF and 0.5 second retention time required to completely destroy TRS compounds. This is because a temperature of 1200^oF or above is necessary to calcine the lime mud to CaO, and lime kilns (such as Seminole's) typically have at least two to three seconds of retention time. EPA further recognized this fact in their reviews of the standards for pulp mills (49 FR 2452 and 51 FR 18538), and deleted the requirement to monitor the lime kiln temperatures. Thus, it is appropriate to assume 100% destruction of all TRS compounds from the No.1 Line Multiple-Effect Evaporator in the lime kiln.

Since incineration in lime kilns is a specified control technology in 17-2.600(4)(c)(1)a, FAC, No.1 Line Multiple-Effect Evaporators is currently in compliance with the Florida TRS rule.

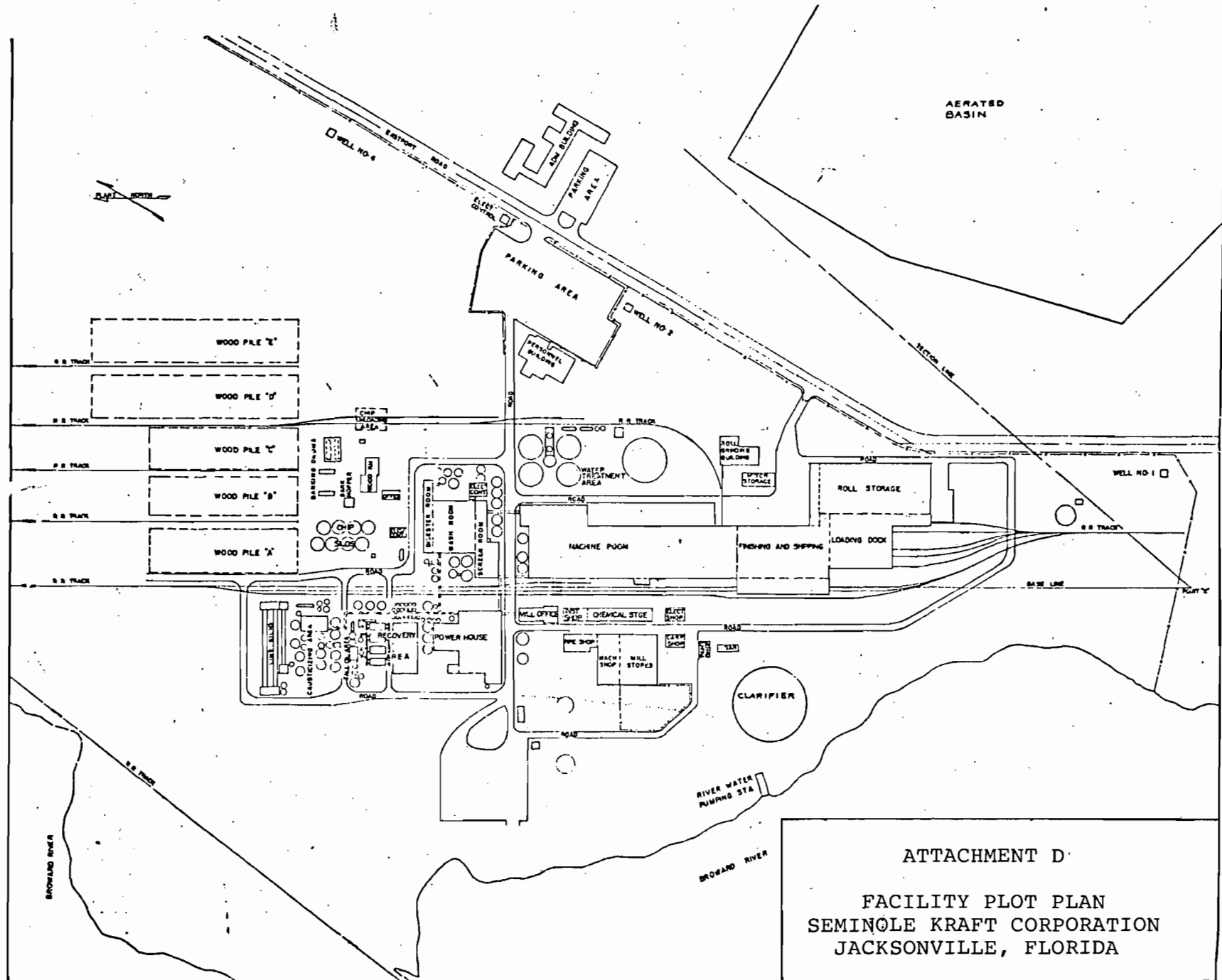


ATTACHMENT B
 FLOW DIAGRAM
 SEMINOLE KRAFT CORPORATION
 JACKSONVILLE, FLORIDA

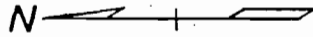
Best Available Copy



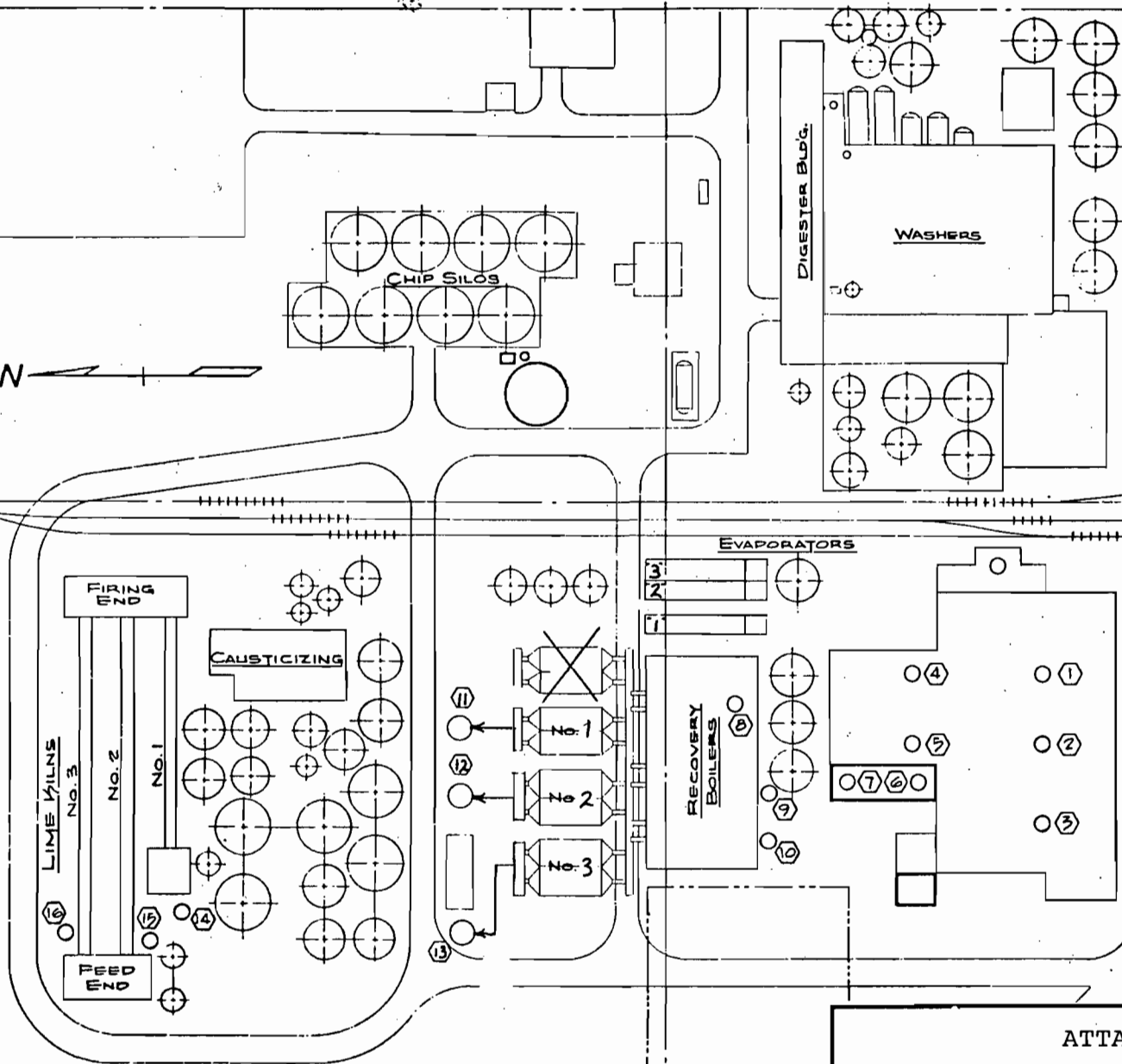
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ATTACHMENT D
FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

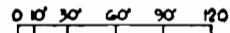


E-2000
BASE LINE



- 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

E-1500
N: 30+00



N: 25+00

ATTACHMENT E
 AIR EMISSION SOURCE DIAGRAM
 SEMINOLE KRAFT CORPORATION
 JACKSONVILLE, FLORIDA

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;
2. Execution of permit applications as required for operation of the corporation's facilities; and
3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: 

Vice President

Subcode 01

File Copy
Receipt # 76193
Pd. \$1000.00
AC 16-141800
✓ # 9394

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NOV 12 1987

BAQM

BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
ERNEST L. FREY
DISTRICT MANAGER



NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959



APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [] New¹ [x] Existing¹

APPLICATION TYPE: [x] Construction [] Operation [] Modification

COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) #2 Line Multi-Effect Evaporators

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville
UTM: East 7441.75 North 3365.60
Latitude 30 ° 25 ' 15 " N Longitude 81 ° 36 ' 00 " W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P. O. Box 26998, Jacksonville, Florida 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corporation

I certify that the statements made in this application for a construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: [Signature]
T. Frank Lee, General Manager
Name and Title (Please Type)
Date: 11/11/87 Telephone No. 904/751-6400

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

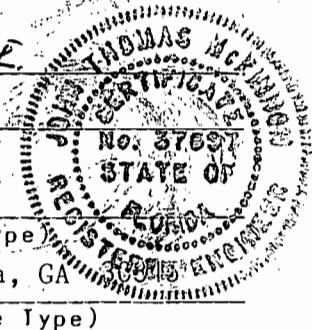
This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

930

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed John T. McKinnon P.E.
 John T. McKinnon, P.E.
 Name (Please Type)
 Stone Container Corporation
 Company Name (Please Type)
 Suite 400, 2150 Parklake Drive, Atlanta, GA
 Mailing Address (Please Type)



Florida Registration No. 37697 Date: 11/11/87 Telephone No. 404/621-6709

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Attachment A

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction complete Completion of Construction complete

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Hot well covers and vent stack tie-in = \$30,000

(cost covers all three lines)

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Draft Interim Operating Permit = A016-116142

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52; if power plant, hrs/yr _____; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions. (Yes or No). NA

- 1. Is this source in a non-attainment area for a particular pollutant? _____
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
- 2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. _____
- 3. Does the State "Prevention of Significant 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? NA

- a. If yes, for what pollutants? _____
- b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate -- lbs/hr	Relate to Flow Diagram
	Type	% Wt		
15% Black Liquor	NA	NA	450,000	19

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 450,000 lbs/hr @ 15% solids
- Product Weight (lbs/hr): 135,000 lbs. /hr @ 50% solids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
TRS	NA - Incinerated		in lime kilns		1,671,737	836	19

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).

$$727 \frac{\text{Ton Pulp}}{\text{Day}} \times \frac{6.3 \text{ lbs. TRS}}{\text{Ton Pulp}} \times \frac{365 \text{ days}}{\text{Year}} = 1,671,737 \frac{\text{lbs. TRS}}{\text{Year}} = 836 \frac{\text{Tons}}{\text{Year}}$$

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Incineration in Lime Kilns	TRS	100%	NA	See Attachment A

E. Fuels NA

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating. NA

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Clean condensate to boiler feed water. Contaminated condensate from
hot well to sewer for treatment in aeration basin.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: See Lime Kilns ft. Stack Diameter: _____ ft.
 Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.
 Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION NA

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____
 Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____
 Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____
 Manufacturer _____
 Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack 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: _____

See Attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Contaminated condensate from hot well to sewer for treatment in aeration basin.

Clean condensate returned to boiler feedwater.

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

- 1. Total process input rate and product weight - show derivation [Rule 17-2.100(127)]
See Section III A
- 2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
See Section III C and Attachment A
- 3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
See Section III
- 4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
See Attachment A
- 5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
See Attachment A
- 6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
See Attachment B
- 7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
See Attachment C
- 8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.
See Attachments D & E

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY NA

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant

Rate or Concentration

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

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:
3. Efficiency:*

2. Operating Principles:
4. Capital Costs:

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

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 NA

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.

ATTACHMENT A

No.2 Line Multiple-Effect Evaporator Construction Permit Application

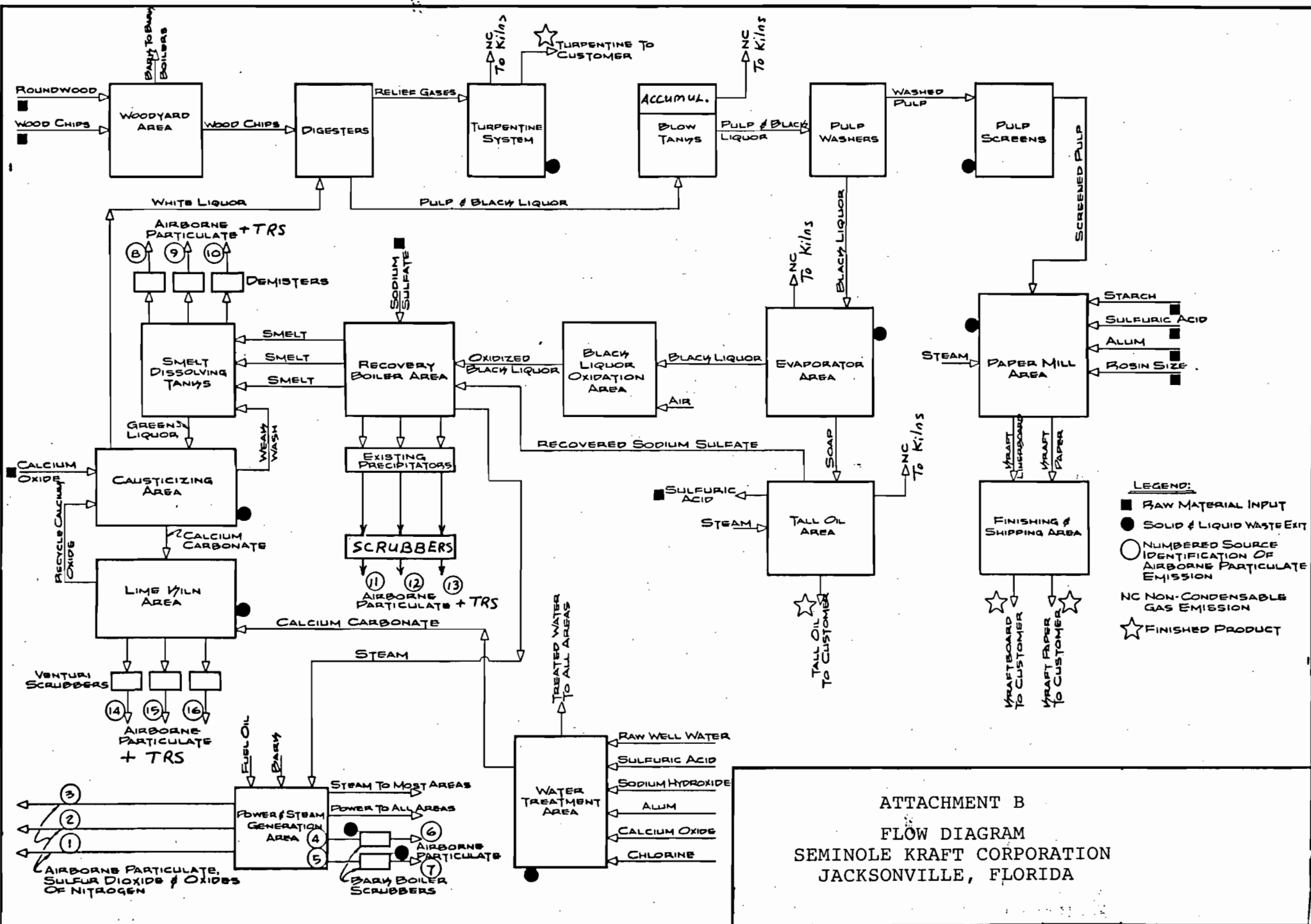
TRS emissions from multiple-effect evaporators are emitted from the condensate hotwells. The hotwell on No.2 Line multiple-effect evaporator was previously open to the atmosphere with no control of TRS.

This construction permit will cover the installation of a stainless steel sheet metal cover on the hotwell with a stack connected to the existing non-condensable gas collection (NCG) system. The cover and stack were installed first in order to analyze the TRS emissions. This was necessary to determine if the mass emission rate of TRS could safely be introduced into the NCG system for incineration in the lime kilns. The data indicated that this was feasible. Then, with the consent of Mr. Jerry Wosley of the Jacksonville BESD, the hotwell stack was tied into the NCG system (along with the hotwells from Numbers 1 and 3 lines multiple-effect evaporators) for a full-scale trial. The piping was installed in a manner which would allow it to be a permanent installation if the trial was successful.

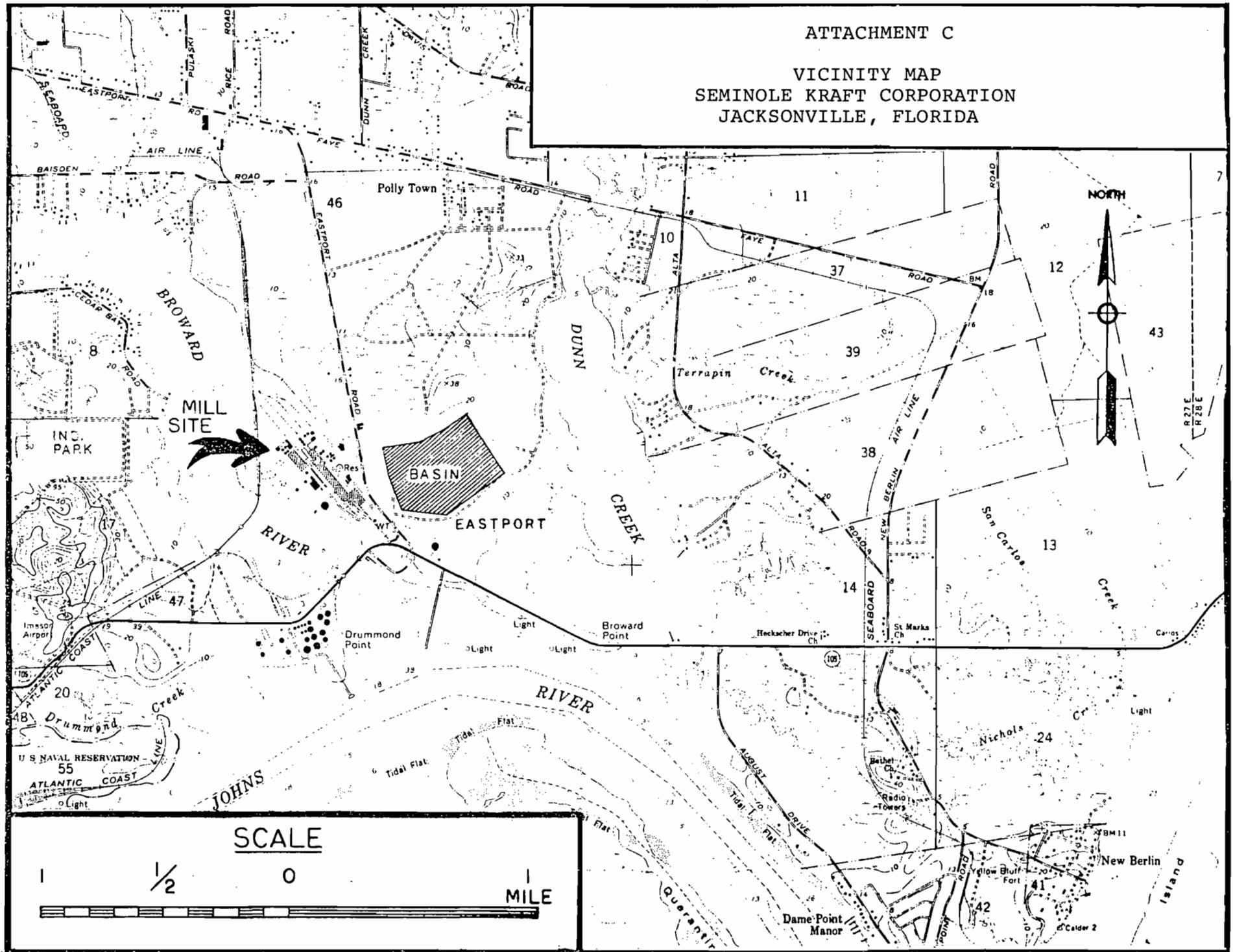
The trial demonstrated that the TRS gasses from all three lines of multiple-effect evaporators may safely be collected in the existing NCG system and incinerated in the lime kilns. Therefore, this construction permit application is to cover the existing installation which is currently in operation.

The use of lime kilns to achieve complete destruction of TRS compounds is a recognized technology that is well documented. AS stated in EPA 450/3-83-017, "Review of New Source Performance Standards for Kraft Pulp Mills", incineration in lime kilns adequately achieves the 1200°F and 0.5 second retention time required to completely destroy TRS compounds. This is because a temperature of 1200°F or above is necessary to calcine the lime mud to CaO, and lime kilns (such as Seminole's) typically have at least two to three seconds of retention time. EPA further recognized this fact in their reviews of the standards for pulp mills (49 FR 2452 and 51 FR 18538), and deleted the requirement to monitor the lime kiln temperatures. Thus, it is appropriate to assume 100% destruction of all TRS compounds from the No.2 Line Multiple-Effect Evaporator in the lime kiln.

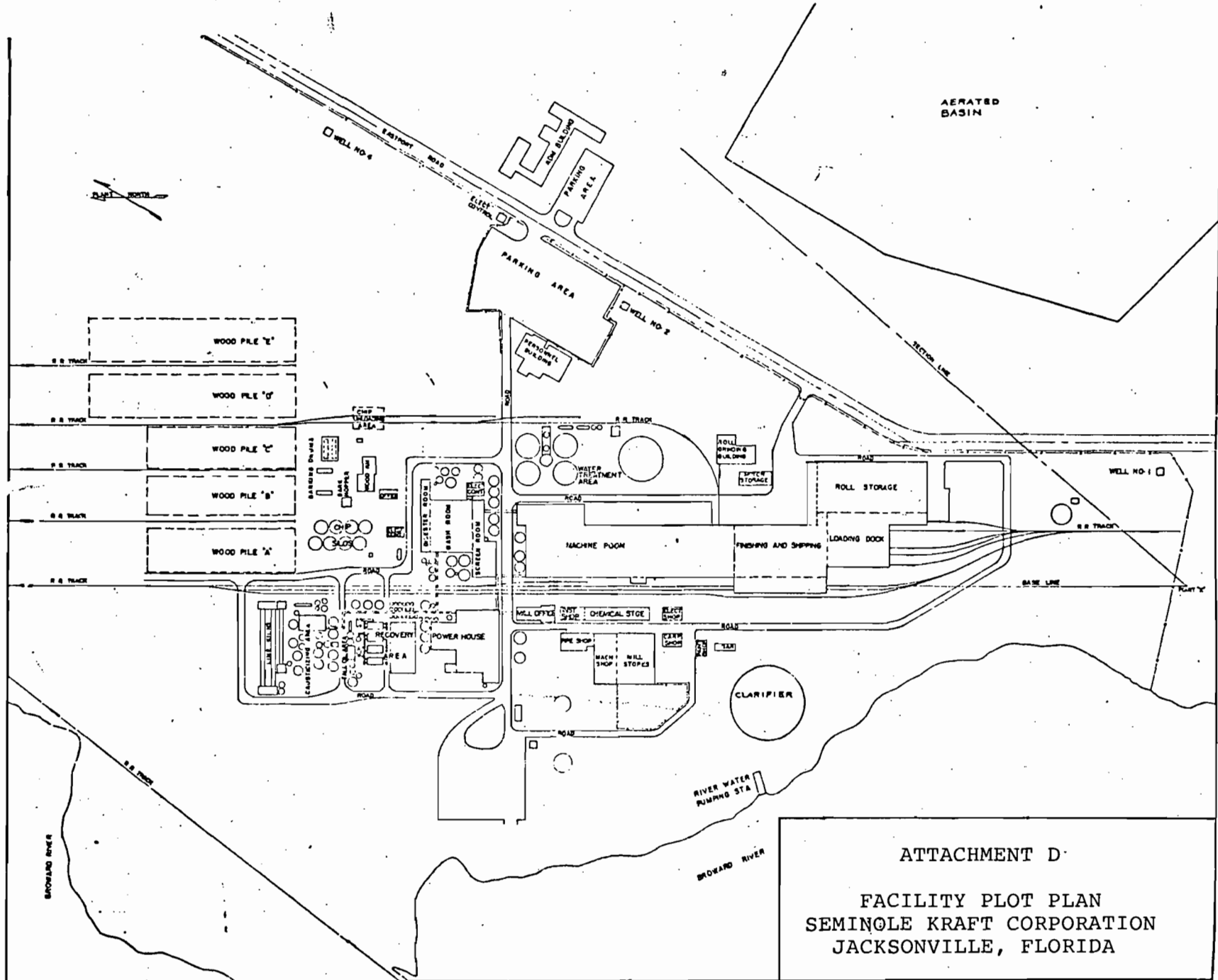
Since incineration in lime kilns is a specified control technology in 17-2.600(4)(c)(1)a, FAC, No.2 Line Multiple-Effect Evaporators is currently in compliance with the Florida TRS rule.



ATTACHMENT B
 FLOW DIAGRAM
 SEMINOLE KRAFT CORPORATION
 JACKSONVILLE, FLORIDA



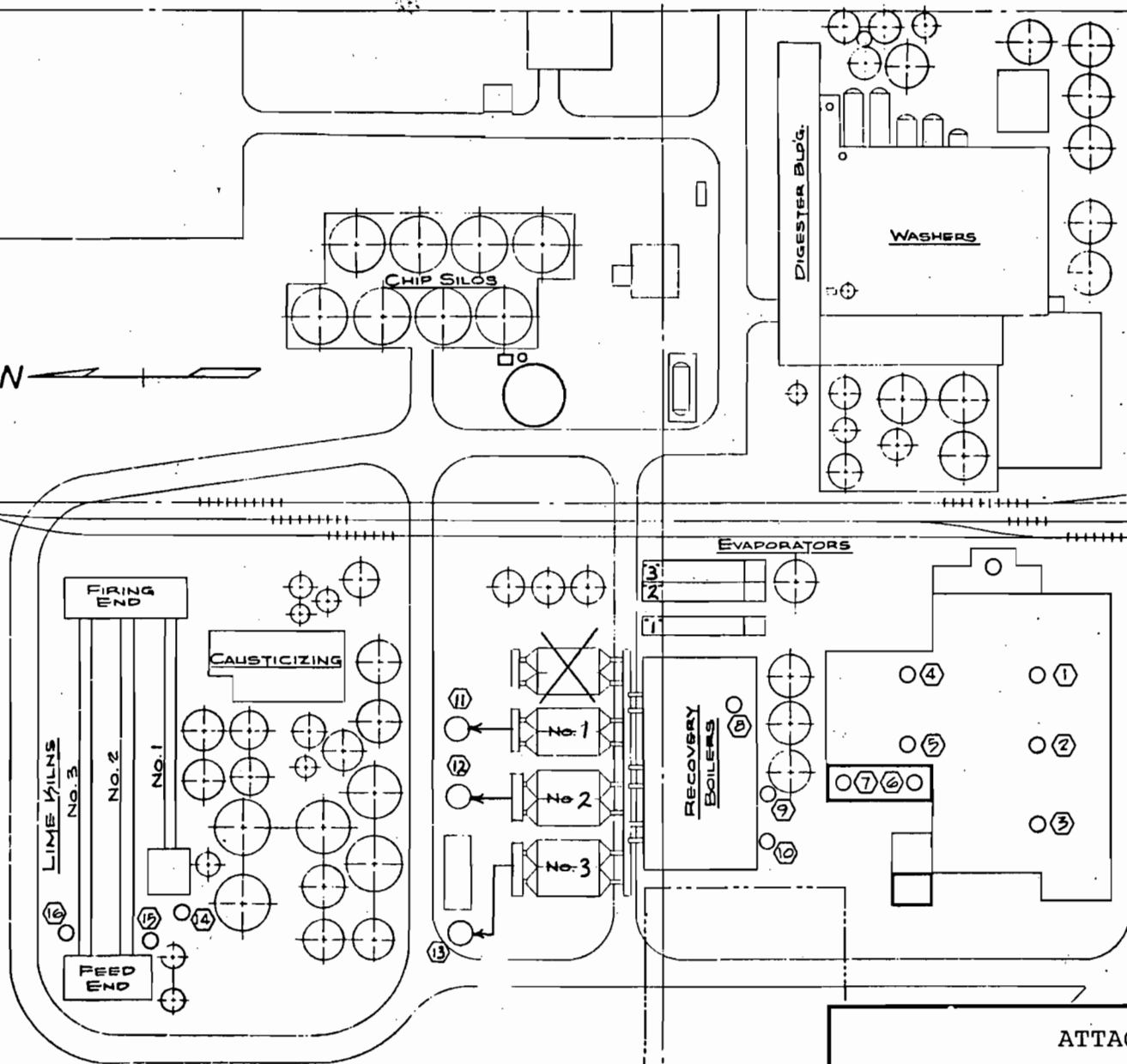
Best Available Copy



ATTACHMENT D
FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



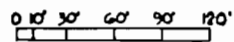
E-2000
BASE LINE



- 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

ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



N. 30 x 00

N. 5 x 00

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;
2. Execution of permit applications as required for operation of the corporation's facilities; and
3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: 

Vice President

DEPARTMENT OF ENVIRONMENTAL REGULATION

DER

NOV 12 1987

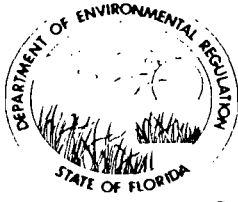
BAQM

File Copy
Receipt 76193
✓ # 9395
Pd. \$1000.00
AC 16-141801

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ERNEST L. FREY
DISTRICT MANAGER



NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [] New¹ [] Existing¹

APPLICATION TYPE: [] Construction [] Operation [] Modification

COMPANY NAME: Seminole Kraft Corporation COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) #3 Line Multi-Effect

SOURCE LOCATION: Street 9469 Eastport Road City Jacksonville ^{Evaporators}

UTM: East 7441.75 North 3365.60

Latitude 30 ° 25 ' 15 "N Longitude 81 ° 36 ' 00 "W

APPLICANT NAME AND TITLE: T. Frank Lee, General Manager

APPLICANT ADDRESS: P. O. Box 26998, Jacksonville, Florida 32218

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Seminole Kraft Corporation

I certify that the statements made in this application for a construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: [Signature]

T. Frank Lee, General Manager

Name and Title (Please Type)

Date: 11/11/87 Telephone No. 904/751-6400

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

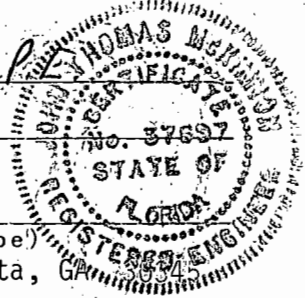
This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

NOAB

Signed John T. McKinnon
John T. McKinnon, P.E.
Name (Please Type)
Stone Container Corporation



Company Name (Please Type)
Suite 400, 2150 Parklake Drive, Atlanta, GA
Mailing Address (Please Type)

Florida Registration No. 37697 Date: 11/11/87 Telephone No. 404/621-6709

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

See Attachment A

B. Schedule of project covered in this application (Construction Permit Application Only)
Start of Construction complete Completion of Construction complete

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Hot well covers and stack tie-in - \$30,000

(Cost covers all three lines)

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Draft Interim Operating Permit = A016-116143

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions. NA
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? _____
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
2. Does best available control technology (BACT) apply to this source? _____
If yes, see Section VI. _____
3. Does the State "Prevention of Significant 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? NA

- a. If yes, for what pollutants? _____
- b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
15% Black Liquor	NA	NA	450,000	20

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 450,000 lbs/hr @ 15% solids

2. Product Weight (lbs/hr): 135,000 lbs/hr. @ 50% solids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
TRS	NA - Incinerated		in lime kiln		1,671,737	836	20

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).

EPA 450/2-78-003b

$$727 \frac{\text{tons pulp}}{\text{day}} \times \frac{6.3 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{365 \text{ days}}{\text{year}} = 1,671,737 \frac{\text{lbs. TRS}}{\text{year}} = 836 \frac{\text{tons}}{\text{year}}$$

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Incineration in Lime Kilns	TRS	~100%	NA	See Attachment A

E. Fuels NA

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating. NA

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Clean condensate to boiler feedwater. Contaminated condensate from hot wells to
sewer for treatment in aeration basin.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: See Lime Kilns ft. Stack Diameter: _____ ft.
 Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.
 Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

NA

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack 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: _____

See Attachment A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Contaminated condensate from hot well to sewer for treatment in aeration basin.

Clean condensate returned to boiler feedwater.

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

- 1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
See Section IIIA
- 2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
See Section III C and Attachment A
- 3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
See Section III C
- 4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
See Attachment A
- 5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
See Attachment A
- 6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
See Attachment B
- 7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
See Attachment C
- 8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

See Attachments D & E

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY NA

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant

Rate or Concentration

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

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

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

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 NA

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).

ATTACHMENT A

No.3 Line Multiple-Effect Evaporator Construction Permit Application

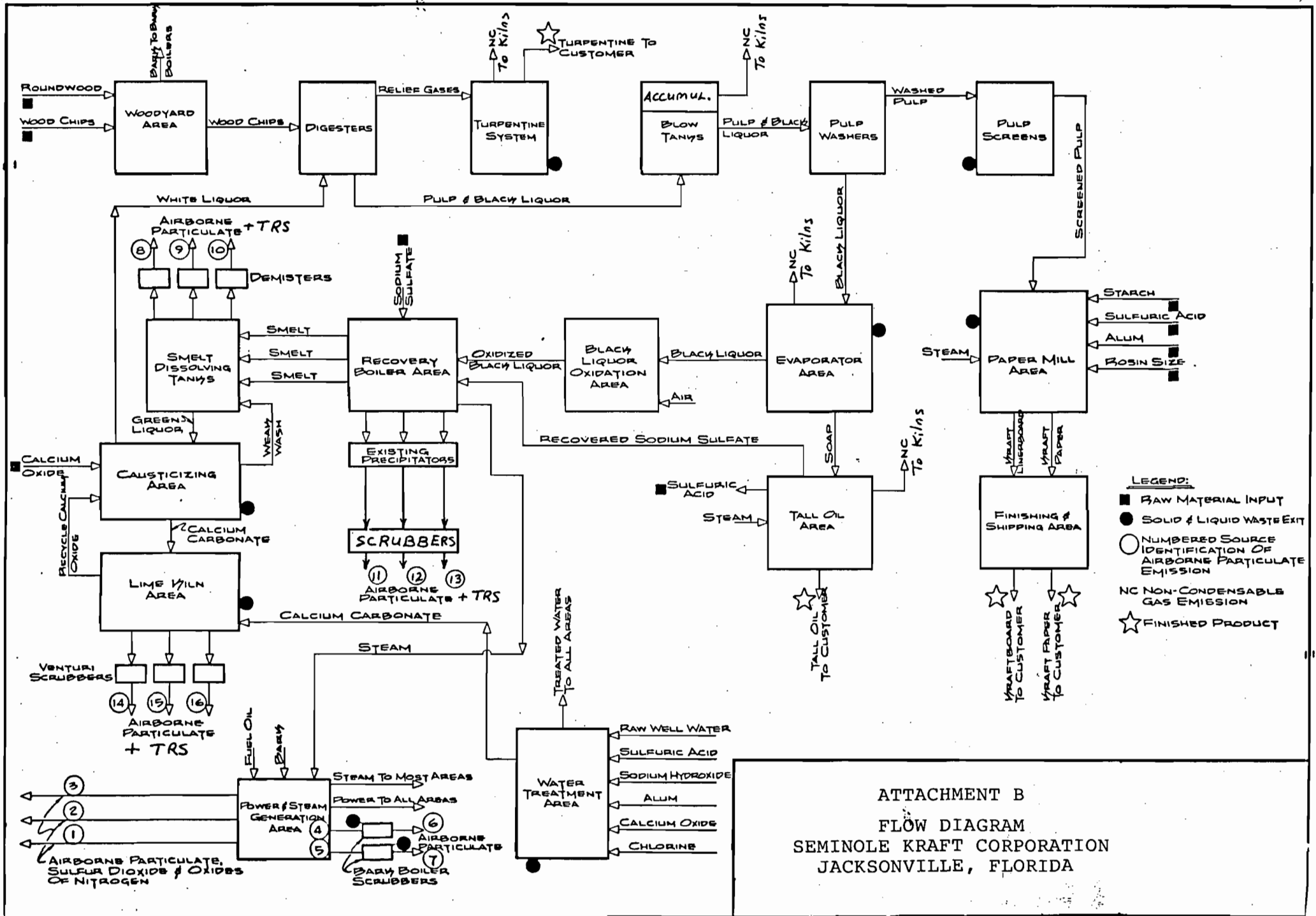
TRS emissions from multiple-effect evaporators are emitted from the condensate hotwells. The hotwell on No.3 Line multiple-effect evaporator was previously open to the atmosphere with no control of TRS.

This construction permit will cover the installation of a stainless steel sheet metal cover on the hotwell with a stack connected to the existing non-condensable gas collection (NCG) system. The cover and stack were installed first in order to analyze the TRS emissions. This was necessary to determine if the mass emission rate of TRS could safely be introduced into the NCG system for incineration in the lime kilns. The data indicated that this was feasible. Then, with the consent of Mr. Jerry Woosley of the Jacksonville BESD, the hotwell stack was tied into the NCG system (along with the hotwells from Numbers 1 and 2 lines multiple-effect evaporators) for a full-scale trial. The piping was installed in a manner which would allow it to be a permanent installation if the trial was successful.

The trial demonstrated that the TRS gasses from all three lines of multiple-effect evaporators may safely be collected in the existing NCG system and incinerated in the lime kilns. Therefore, this construction permit application is to cover the existing installation which is currently in operation.

The use of lime kilns to achieve complete destruction of TRS compounds is a recognized technology that is well documented. AS stated in EPA 450/3-83-017, "Review of New Source Performance Standards for Kraft Pulp Mills", incineration in lime kilns adequately achieves the 1200^oF and 0.5 second retention time required to completely destroy TRS compounds. This is because a temperature of 1200^oF or above is necessary to calcine the lime mud to CaO, and lime kilns (such as Seminole's) typically have at least two to three seconds of retention time. EPA further recognized this fact in their reviews of the standards for pulp mills (49 FR 2452 and 51 FR 18538), and deleted the requirement to monitor the lime kiln temperatures. Thus, it is appropriate to assume 100% destruction of all TRS compounds from the No.3 Line Multiple-Effect Evaporator in the lime kiln.

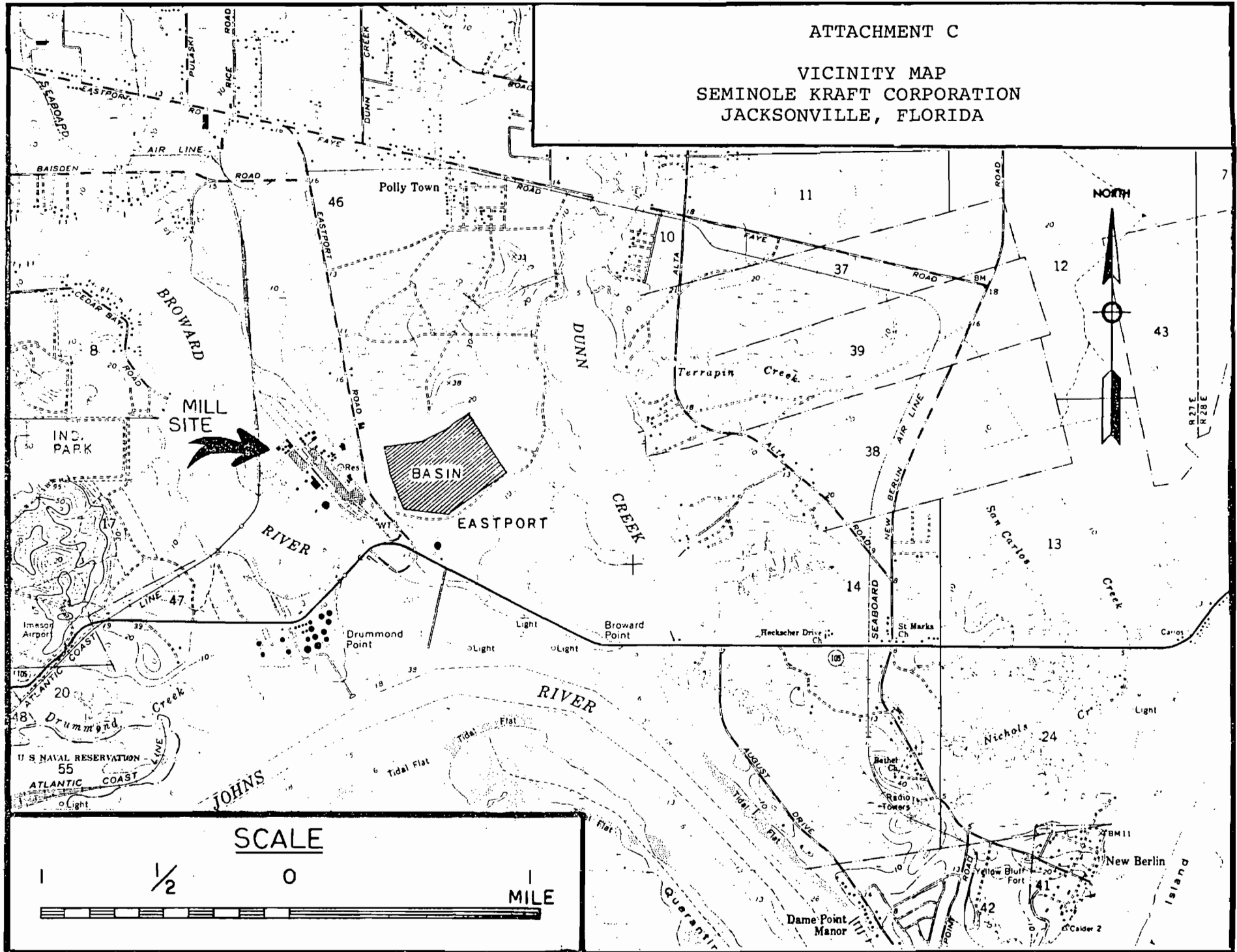
Since incineration in lime kilns is a specified control technology in 17-2.600(4)(c)(1)a, FAC, No.3 Line Multiple-Effect Evaporators is currently in compliance with the Florida TRS rule.

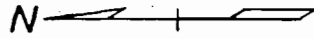


- LEGEND:**
- RAW MATERIAL INPUT
 - SOLID & LIQUID WASTE EXIT
 - NUMBERED SOURCE IDENTIFICATION OF AIRBORNE PARTICULATE EMISSION
 - NC NON-CONDENSABLE GAS EMISSION
 - ☆ FINISHED PRODUCT

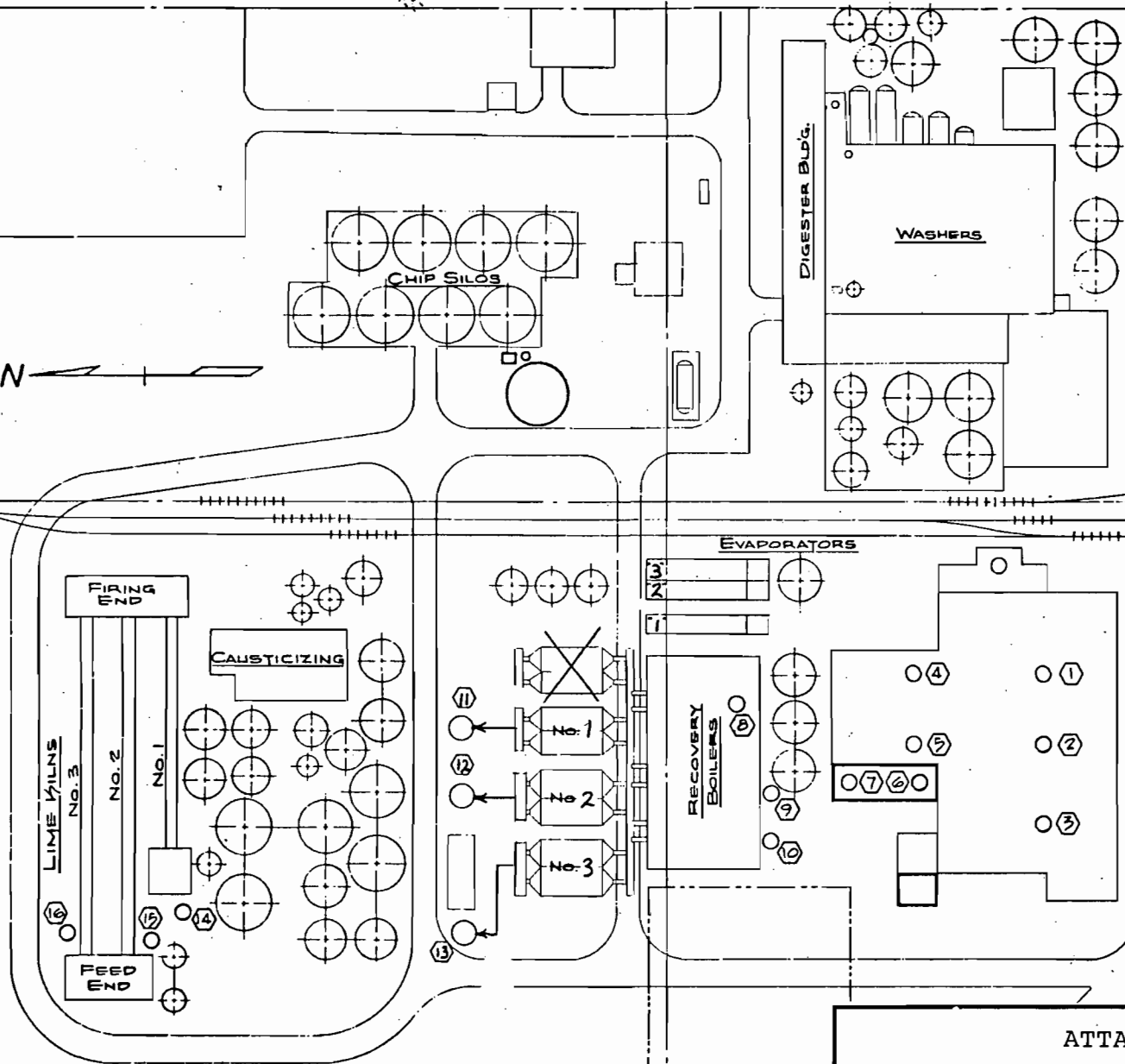
ATTACHMENT B
 FLOW DIAGRAM
 SEMINOLE KRAFT CORPORATION
 JACKSONVILLE, FLORIDA

Best Available Copy

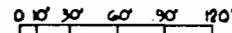




E-2000
BASE LINE



- 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



ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

October 30, 1986

Mr. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

Dear Mr. Lee:

This letter confirms authorization previously given you to undertake certain activities relating to compliance with environmental statutes and regulations on behalf of Seminole Kraft Corporation to bind the Corporation by your actions.

Those activities include:

1. Attendance at meeting with Federal, State and local regulatory officials;
2. Execution of permit applications as required for operation of the corporation's facilities; and
3. Execution of consent orders requiring compliance with various environmental statutes and regulations.

Sincerely yours,

Seminole Kraft Corporation

By: 

Vice President



23 Oct. 87
Atlanta, GA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4APT-AC

OCT 23 1987

Mr. William A. Thomas, P.E., Administrator
Central Air Permitting
Florida Department of Environmental
Regulation
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
OCT 26 1987
BAQM

Dear Mr. Thomas:

As requested in your letter of September 24, 1987, we have reviewed the planned renovations to the No. 6 Recovery Furnace at St. Joe Paper Company's Port St. Joe, Florida facility. The planned renovation for the No. 6 Recovery Furnace includes: increasing the firing rate from 900,000 lb per day of black liquor to 1,200,000 lb per day; replacing the direct contact evaporator with an indirect contact evaporator; renovating the wet-bottom ESP to increase particulate removal efficiency; and renovating the wet-bottom portion of the ESP.

Your letter contained various statements and conclusions regarding the possible application of New Source Performance Standards (40 CFR Part 60, Subpart BB) and Prevention of Significant Deterioration (PSD) to the recovery furnace after it has been renovated. We are providing the following response regarding your conclusions.

Applicability of 40 CFR Part 60, Subpart BB

An existing facility can become subject to the applicable provisions of New Source Performance Standards (NSPS) if it is either modified or reconstructed. Modification is addressed in 40 CFR §60.14, which states that any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification. Reconstruction is defined in 40 CFR §60.15. In order for an existing facility to be considered reconstructed, the fixed capital cost of the new (replacement) components must exceed 50 percent of the fixed capital cost of a comparable, entirely new facility.

Based on the information provided and in the literature, we believe that the Total Reduced Sulfur (TRS) emission rate from the recovery furnace should decrease. Therefore, the facility would not become subject to the TRS standard of Subpart BB because a modification would not have occurred.

Removing the direct contact evaporator and increasing the firing rate of the recovery furnace will increase the amount of particulate to the ESP, however, the renovated ESP should have a higher particulate removal efficiency. This combination makes it unclear whether the particulate emission rate will increase, decrease, or remain the same.

St. Joe Paper Company's basis for demonstrating a decrease in the particulate emission rate is not acceptable. Their estimate of the particulate emission rate before renovation is based on the current particulate standard for the No. 6 Recovery Furnace. Previous test data (July 26, 1976) indicates that the actual particulate emission rate was 14 percent of the standard. This indicates that an increase in the particulate emission rate will occur after renovation if the renovated ESP emits particulate at the level that the ESP vendor guarantees.

A determination of the applicability of the particulate emission standard of 40 CFR Part 60, Subpart BB because of modification can only be made by a comparison of test data from before and after the renovation. Although St. Joe Paper Company contends that test data obtained before the renovation is not valid because the test methods utilized did not meet today's criteria in Method 5, we believe that the test data generated from these tests are the best estimate of actual emissions before the renovation. When tests are conducted after the renovation, we propose that the test method that was utilized before the renovation be employed so that comparable results can be obtained. For example, if aluminum thimbles were used to collect particulate during the tests before the renovation then they should be utilized for the tests after the renovation. This testing methodology would be used only for comparative purposes and not for compliance determinations.

The information provided to substantiate that reconstruction (as defined in 40 CFR §60.15) will not occur is not acceptable since we could not determine the exact cost basis for the estimate. The December 16, 1985, preamble to the reconstruction regulations defines fixed capital cost as the capital needed to provide all the depreciable components, including the costs of engineering, purchase and installation of major process equipment, contractor fees, instrumentation, auxiliary facilities, buildings and structures. In addition, costs associated with the purchase and installation of air pollution control equipment are only included in the fixed capital cost to the extent that the equipment is required as part of the manufacturing/operation process. The reconstruction regulation also specifies that the entirely new facility must be comparable to the planned renovated facility.

The fixed capital cost of the renovated recovery furnace and the entirely new facility must be detailed and revised to include the items referenced above. In addition, we request that the cost of retrofitting the wet-bottom ESP and a comparable entirely new wet-bottom ESP be included as separate cost items. The cost associated with the wet-bottom ESP may be included in the fixed capital costs if it is determined that it is required as part of the operating process.

The fixed capital cost for the entirely new facility included the cost of a cascade evaporator (direct contact evaporator). This cost can not be used because the planned renovated facility will not include a cascade evaporator.

When you receive the revised reconstruction costs of the facility, we would appreciate the opportunity to review this information.

We are in agreement with you that an increase in the smelt feed rate to the smelt tanks does not necessarily make the smelt tanks subject to NSPS. If the smelt tanks were originally designed to accommodate the higher feed rate then the smelt tanks would not be considered modified. However, Mr. Mike Harley of your office indicated that the practice of recirculating green liquor back to the smelt tanks will cease in order to accommodate the increased smelt feed rate. We view this as an operational change (as cited in 40 CFR §60.14) to the smelt tanks. Therefore, the smelt tanks will become subject to 40 CFR Part 60, Subpart BB because the operational change will increase the TRS emission rate.

Increasing the design capacity of an existing facility does not necessarily subject the existing facility to NSPS. In order for the existing facility to become subject to NSPS, an increase in the actual (not allowable) emission rate of a pollutant to the atmosphere for which a NSPS standard applies would have to accompany the increase in the design capacity. Either AP-42 factors or actual emission tests can document the change in the emission rate. If the facility owner or operator does not inform you of the increase in design capacity of the facility and an increase in the actual emission rate of a regulated pollutant occurs, then the facility owner or operator would be in violation of NSPS from the time that the design capacity was increased.

Applicability of PSD Regulations

In your letter, you stated that the reactivation of the No. 6 recovery furnace will not trigger a full PSD review. EPA agrees in part with this determination.

It is current EPA policy that if a source can demonstrate, to the satisfaction of the Administrator, that the shutdown of a unit was not intended to be of a permanent nature, PSD review would not apply to that unit's reactivation. Recovery furnace No. 6 has been in cold standby for the last 9-1/2 years. However, the company has maintained a continuous state operating permit and has made it clear that the unit was not permanently shutdown. Therefore, the mere startup of recovery furnace No. 6 would not trigger new source review.

However, since the company is proposing to make physical and operational changes to recovery furnace No. 6 prior to reactivation, some change in previous emission levels may occur. It cannot be determined from the available information whether or not this modification would cause a "significant" net emissions increase and subject the renovated No. 6 recovery furnace to PSD requirements. In order to assess whether a major modification will occur, the increase in emissions over previous actual emission levels will need to be projected. For TRS, the new emissions change should be negative due to the increased capability of the recovery boiler to control TRS emissions and the removal of the direct contact evaporator. However, for particulate emissions, pre-shutdown test data should be compared to estimated post-startup emission levels. (Note that PM₁₀ emissions may also need to be addressed). In addition, the net emissions change for other pollutants

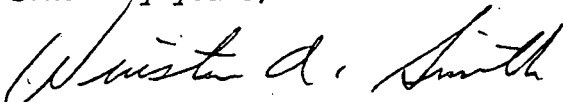
(SO₂, NO_x, CO, etc.) will have to be determined. The emissions charges associated with the appropriate smelt dissolving tank should also be included in the net emissions calculations. If a "significant" net emissions increase of any pollutant occurs as a result of the physical changes to the No. 6 recovery furnace, then PSD would apply to the reactivation/modification.

You stated in your letter that the PSD review for the No. 9 power boiler did not include emissions from the No. 5 or the No. 6 recovery furnaces. Since these two units were on cold standby at the time of the PSD application for the No. 9 power boiler, the actual emissions of these units were assumed to be zero and were not included in any ambient impact analyses. EPA guidance specifies that when modeling multi-source areas to determine compliance with short-term and annual ambient standards, nearby background sources should be modeled using the following: maximum allowable emissions, actual or design capacity (whichever is greater), and time periods which represent continuous operation. Even though both recovery furnaces No. 5 and No. 6 were not operating, they both had valid operating permits and should have been included in the PSD modeling for power boiler No. 9 at their allowable emission rates and design capacities.

In order to allow the reactivation of recovery furnaces No. 5 and No. 6, ambient analyses must be performed to validate the previous PSD review. If both recovery furnaces were in existence on the baseline date, these units would not contribute to increment consumption and therefore any increment modeling done in conjunction with the No. 9 power boiler's PSD application would be preserved. However, emissions from these two units will affect the results of the ambient standard analysis. As you have proposed in your letter, modeling analyses should be done for recovery furnaces No. 5 and No. 6 to ensure attainment of the ambient particulate standard. All changes in particulate emission levels due to the reactivation of these sources (including any increase from the modification of recovery furnace No. 6 and any increases from the smelt dissolving tanks) should also be included in the ambient analysis.

Thank you for the opportunity to review this source modification package. If we may be of further assistance to you or your staff, please contact us. Any questions regarding NSPS, may be addressed to Paul Reinermann at 404/347-2904. If you have any questions regarding PSD, please contact Janet Hayward at 404/347-2864.

Sincerely yours,



Winston A. Smith, Director
Air, Pesticides and Toxics
Management Division

Copied: CHF / BT

Bruce Mitchell

Mike Harley

Betsy Pittman / Mark Zilburburg

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May 4, 1987

DER
MAY 8 1987
BAQM



Mr. Frank Lee
Seminole Kraft Paper Company
P. O. Box 26998
Jacksonville, FL 32218-0998

Re: Foam Control
Rainbird System

Dear Mr. Lee:

In regard to the referenced subject, the Bio-Environmental Services Division (BESD) staff has brought to my attention the modification contemplated on the Rainbird system in order to combat foam formation.

In specific, I was impressed with the long range plan to modify the Rainbird system by extension of the piping, installation of a second pump and the addition of 14 spray nozzles. The problem of foam fallout from the wastewater pond has plagued Jacksonville for many years (especially during the dry months) and a solution of the kind proposed will go a long way towards the elimination of this chronic nuisance. The money (\$150,000) earmarked for this project demonstrates a good faith effort on the part of Seminole Kraft Corporation to correct the problem. The Environmental Protection Board (EPB), by way of this letter, applauds the initiative and urges Seminole Kraft Corporation to complete the project at the earliest time in view of the approaching dry season.

I have also been briefed by the BESD staff on the extensive modifications done at the mill and of the fact that \$5 million of the approximately \$18 million spent on mill modifications went towards the improvement of environmental systems. The EPB appreciates the effort being made by Seminole Kraft Corporation to nurse the mill back to health in full cognizance of the air pollution regulations.

I would like to reaffirm the EPB's resolve to ensure the mill's operation in compliance with all environmental rules. The mill has had its share of problems in the past and I am, therefore, directing the BESD staff to continue close surveillance of the mill's operation, especially in regard to the following:

1. Continued compliance with all existing emission standards for criteria pollutants.
2. Compliance with the schedule in the TRS rule, as adopted in the City of Jacksonville's Odor Attainment Plan.

/Continued.....



Seminole Kraft

	TOPs	Proposed App.
1. No. 2 Batch Digestor Sys AC 16-141798 1857 ADP tons/day 1987 AD Tons pulp/day	450,667 <u>30,767</u> 481,434 189,602	580,000 wood chips <u>898,000</u> Blk wt 11% 1,478,000 lbs/hr Total processing unit 165,583 ADP pulp/hr
2. No. 1 Lime kiln AC 16-141790 596 TPD		24,000 lbs/hr lime mud (dry) 12,200 lbs/hr CaO (dry)
3. No. 2 Lime kiln AC 16-141792 795 TPD		32,000 16,300
4. No. 3 Lime kiln AC 16-141793 795 TPD		32,000 16,300
5. No. 1 SOT AC 16-141794 307 lbs TDS ton pulp 558 TPD		27,000 lbs/hr molten salt 27,000 " general solids 27,000 " " product out
6. No. 2 SOT AC 16-141795 714 TPD		34,532 lbs/hr 34,532 34,532
7. No. 3 SOT AC 16-141796 714 TPD		34,532 lbs/hr 34,532 34,532
8. No. 1 MBE AC 16-141799 420 vs 533 Tons Pulp/Day	275,000 lbs/hr @ 15% ALS 22,500 " @ 50%	330,000 lbs/hr 15% ALS 99,000 lbs/hr @ 50% ALS
9. No. 2 MBE AC 16-141800 520 vs 727 Tons Pulp/Day	380,350 @ 13.4% 102,000 @ 50%	450,000 @ 15% ALS 135,000 lbs/hr @ 50% ALS
10. No. 3 MBE AC 16-141801 520 vs 727	380,350 @ 13.4% 102,000 @ 50%	

Sample Craft

Small Drinking Table

new scrubber
+ demister

No 1

Revised
27000 1 1/2 hr GLS

Interi

Clung

PM

64704

@ .04414 / 1000 GLS

TKS

3.6704

No 2

34532 1 1/2 hr GLS

PM

73704

TKS

4.6717

@ .04414 / 1000 GLS

u

No 3

34532 1 1/2 hr GLS

PM

73704

TKS

4.6704

1. How much BLS are there? Std is 9000 BLS
and # are in GLS!

2. PLS verify that densiter can handle
in excess of 10000 Apts (No 2 & 3 & Totals)!

OK up to
17.5 KPS

in excess of 14 fps (No 2 & 3) #

Black Digesters

Computers
NCG Syst

Wood Chys 580 G 1 1/2
B+W Cyran 598 G
TFS 3808 TP4

Prop

Refine

6. Long

Folium Fila

No 2 / No 3

↑

MED #1

15/ BLS 330 G 1 1/2
Product (50%) 99 G
TFS 612 TP4

Household
concs
& NCG dust

MED #2

15/ BLS 450 G 1 1/2
Product (50%) 135 G 1 1/2
TFS 836 TP4

MED #3

15/ BLS 450 G 1 1/2
Product (50%) 135 G
TFS 836 TP4

already
in place
new document

1. Existing NCG system on line files, #?

2. Contained condensate from list well to aerolizer
basin gas f TRS??

~~Atok~~ Lin Koko

Mud Filter
60% extra scrubbing

No 1

~~Repaired~~

~~NW~~

~~Clay~~

Mud 246 lb/h
 CaO dry 12.2 G 14/h
 PM 63 TRP
 No 6 oil 400 GPH
 60 mm 180/h
 TRS 20ppm (457 TRP)
100

Replace Mud filter

No 2

Mud 32 G 14/h
 CaO dry 16.3 G 14/h
 TRS 20ppm (609 TRP)
110
 PM 63 TRP
 No 6 oil 400 GPH
 60 mm 180/h

Replace Mud filter

No 3

Mud 32 G 14/L
 CaO dry 16.3 G
 PM 63 TRP
 TRS 20ppm (609 TRP)
 No 6 oil 400 GPH
 60 mm 180/h