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

4. Article Number
P 274 010 363

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X

7. Date of Delivery

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

PS Form 3811, Feb. 1986 **DOMESTIC RETURN RECEIPT**

P 274 010 363

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to Mr. T. Frank Lee
Seminole Kraft Corporation
Street and No. P.O. Box 26998
P.O., State and ZIP Code 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: 04-05-88 Permits: AC 16-141794, -141795, -141796	

PS Form 3800, June 1985 ★ U.S.G.P.O. 1985-480-794

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

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

April 4, 1988

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

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

Copy furnished to:

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

Final Determination

Seminole Kraft Corporation
Duval County
Jacksonville, Florida

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

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

March 28, 1988

Final Determination

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

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

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

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

1. No response necessary.

2. No response necessary.

3. No response necessary.

4. The Bureau agrees with the comment and the following will be changed:
Specific Condition No. 8:
From: The permittee shall provide proof of compliance in accordance with the Consent Order, OGC Case No. 86-1405, dated October 28, 1986, by May 12, 1988, to the BESD office.
To: The permittee shall be in final compliance in accordance with the Consent Order, OGC Case 86-1405, dated October 28, 1986, by May 12, 1988, and will provide proof of final compliance to the BESD office by June 26, 1988.

5. No response necessary

6. The Bureau agrees with the comment and the following will be changed:
   Specific Condition No. 13, 2nd Paragraph:
   From: If the construction permit expires prior to the permittee obtaining a permit to operate, then all activities at the project must cease. (FAC Rule 17-4)
   To: If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease. (FAC Rule 17-4)

7. The Bureau agrees with the request to change the expiration date:
   From: August 10, 1988
   To: January 1, 1989

8. No response necessary.

Attachments to be Incorporated:

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

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

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

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

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

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

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

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

ATTACHMENTS

AC 16-141794

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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.

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.

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

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

2. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H_2S) shall not exceed 0.048 pound per 3000 pounds black liquor solids (0.82 lb/hr or 3.6 tons/yr and based on a projected maximum processing capacity of 51,500 lbs/hr black liquor solids (BLS) in the No. 1 recovery boiler (RB) - equivalent to 27,000 lbs/hr green liquor solids (GLS)).

SPECIFIC CONDITIONS:

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

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

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

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

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

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

b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources

c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

Issued this 30 day of March, 1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann

Dale Twachtmann, Secretary

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

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

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

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

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

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

ATTACHMENTS

AC 16-141795

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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.

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.

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

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

2. Total reduced sulfur emissions (TRS) as hydrogen sulfide (H_2S) shall not exceed 0.048 pound per 3000 pounds black liquor solids (1.05 lbs/hr or 4.6 tons/yr and based on a projected maximum processing capacity of 65,900 lbs/hr black liquor solids (BLS) in the No. 2 recovery boiler (RB) - equivalent to 34,532 lbs/hr green liquor solids (GLS)).

SPECIFIC CONDITIONS:

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

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

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

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

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

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

b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources

c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

Issued this 30 day of March, 1988.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann

Dale Twachtmann, Secretary

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

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

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

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

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

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

ATTACHMENTS

AC 16-141796

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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.

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.

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

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

2. Total reduced sulfur emissions (TRS) as hydrogen sulfide (H_2S) shall not exceed 0.048 pound per 3000 pounds black liquor solids (1.05 lbs/hr or 4.6 tons/yr and based on a projected maximum processing capacity of 65,900 lbs/hr black liquor solids (BLS) in the No. 3 recovery boiler (RB) - equivalent to 34,532 lbs/hr green liquor solids (GLS)).

SPECIFIC CONDITIONS:

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

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

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

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

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

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

b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources

c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

Issued this 30 day of March, 1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann

Dale Twachtmann, 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: _____

Last page to be signed - Please Thanks

TO: Dale Twachtmann

FROM: Howard L. Rhodes

SUBJ: Approval of Construction Permits Nos.: AC 16-141794
AC 16-141795
AC 16-141796

Seminole Kraft Corporation

DATE: March 28, 1988

Attached for your approval and signature are permits prepared by Central Air Permitting for the above mentioned company to construct/install new Munters T-271 chevron plate type mist eliminators with dual direction spray nozzles mounted underneath the mist eliminators on the existing Nos. 1, 2 and 3 Smelt Dissolving Tanks. The existing 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 June 10, 1988.

I recommend your approval and signatures.

RECEIVED
APR 01 1988
DER - BAQM

HLR/aqm/bm

attachments

RECEIVED
MAR 31 1988
Office of the Secretary

RECEIVED
MAR 30 1988
Office of the Secretary

<u>Check Sheet</u>

Company Name: Seminole Kraft Corporation
Permit Number: AC 16-141794, -795, -796
PSD Number:
Permit Engineer:

Application:

3 ☑ Initial Application
- ☑ Incompleteness Letters
- ☑ Responses
- ☐ Waiver of Department Action
- ☐ Department Response
- ☐ Other

Cross References:
- ☑ Boiler #1 & 2 repairs (4/17/87
- ☐
- ☐

Intent:

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

Final Determination:

- ☑ Final Determination
- 3 ☑ Signed Permit
- ☐ BACT or LAER Determination
  - ☐ Other

Post Permit Correspondence:

- ☐ Extensions/Amendments/Modifications
- ☑ Other

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
ELEANOR A. JOSEPH
DOUGLAS P. MANSON
R. L. CALEEN, 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 17, 1987

Mr. Ernie Frey
District Manager
Northeast Florida District
Department of Environmental Regulation
3426 Bills Road
Jacksonville, Fl 32207

Re: Seminole Kraft Corporation
Repairs to Boilers #1 and 2, Use of Temporary Package Boiler

Dear Mr. Frey:

This is to confirm and supply supporting documents relating to a matter we discussed earlier this week with Bill Stewart, and which has been referred to Clair Fancy, Bill Thomas, and Julie Costas for their assistance.

Seminole Kraft, which we represent, would like to make repairs to Power Boilers #2 and #3 due to leaking generating tubes. These tubes have been plugged to allow operation but the result is boiler shut-down, reduced fuel efficiency, and increased emissions for each unit of steam produced.

The mill proposes to install and operate a temporary package boiler while each of the permanent boilers is under repair. The package boiler would be installed next to the permanent boiler building and would have a separate temporary stack of the same height and diameter as boilers #2 and #3. After boiler #2 is repaired, it would be put back on line and boiler #3 repaired. Repairs to both boilers would take a total of approximately six months and would begin in seven or eight weeks.

As shown on the attached sheets, the temporary boiler is slightly smaller than the permanent boilers so less pollutants should be emitted. The fuel will be low sulfur #6 fuel oil, as used in the permanent boilers.

Since there will be no increase in the actual emission of any air pollutant regulated by DER, it does not appear that a permit is required. See, Rule 17-2.100 (119) F.A.C.

Before proceeding with the work, however, we would like to confirm that no permit is required. Clair Fancy indicated that we should receive DER's response by April 22, 1987.

We thank those involved for their time and efforts.

Sincerely,

R. L. Caleen

R. L. Caleen

RLC:slt

Bill T talked to Tom & said it

cc: Charlie Ackel
John McKinnon
Bill Stewart
Julie Costas
Clair Fancy
Bill Thomas
John Millican
Frank Lee
Don Bayly

POWER SYSTEMS
COMBUSTION ENGINEERING INC

PROPOSAL NO. 100681

PROPOSED TEMPORARY BOILER

PREDICTED PERFORMANCE

The performance data stated below is based on the Performance Conditions and fuel analysis specified in the preceding paragraphs. It is not to be construed as guaranteed unless the data coincides with that stated on the Performance Guarantee Page of this Proposal.

Fuel		Nat. Gas	No. 6 Oil	No. 2 Oil
Evaporation	Lbs./Hr.	150,000	150,000	150,000
Temperature at S.H. Outlet-	°F	850	805	805
Pressure at S.H. Outlet-	PSIG	600	600	600
Superheater Pressure Drop	PSIG	47	46	46
Feedwater Temperature	°F	230	230	230
Blowdown	%	-	-	-
Gas Temp. Leaving Boiler	°F	659	638	640
Gas Leaving Boiler	Lbs./Hr.	207,880	205,940	207,180
Air Leaving F.D. Fan	Lbs./Hr.	196,610	193,750	195,370
Excess Air Leaving Boiler	%	10	15	15
Combustion Rate	Btu/Hr./Cu. Ft.	108,990	100,670	101,760
Fuel Fired	Lbs./Hr.	-	12,190	11,810
	SCFH	226,910	-	-
Efficiency	%	75.95	80.58	79.72
Air & Gas Pressure Drop:				
Superheater	in. wg.	0.89	0.84	0.85
Windbox	in. wg.	9.16	8.88	9.02
Air Ducts	in. wg.	0.30	0.29	0.30
Boiler	in. wg.	10.89	10.35	10.50
Gas Ducts	in. wg.	0.49	0.48	0.49
Total	in. wg.	21.73	20.84	21.16

EXISTING BOILERS

PREDICTED PERFORMANCE

The following performance is predicted only and is not to be construed as being guaranteed except where the points coincide with those on the preceding page.

			Oil	
Fuel				
Evaporation,		lb/hr	200,000	220,000
Temperature at superheater outlet,		deg F	740	750
Pressure at superheater outlet,		psi	625	625
Superheater pressure drop,		psi	21.0	25.0
Feedwater temperature,		deg F	350	350
Efficiency,		pct	86.17	85.96
Fuel fired,		lb/hr	13,300	14,600
Combustion rate,	Btu/cu	ft/hr	27,000	29,700
Excess air leaving boiler,		pct	20.0	20.0
Gas leaving air heater,		lb/hr	234,000	258,000
Air leaving air heater,		lb/hr	203,000	226,000
Gas temperature leaving boiler,		deg F	660	670
Gas temperature leaving air heater,		deg F	355	365
Air temperature entering air heater,		deg F	80	80
Air temperature leaving air heater,		deg F	455	490
Draft losses: Furnace,		"wg	0.15	0.15
Superheater,		"wg	0.90	1.20
Boiler,		"wg	2.65	3.10
Air heater,		"wg	2.20	2.60
Ducts,		"wg	0.45	0.55
Total,		"wg	6.35	7.60
Air pressure losses: Burners,		"wg	3.50	4.80
Air heater,		"wg	2.75	3.25
Ducts,		"wg	0.70	0.75
Total,		"wg	6.95	8.80
Heat balance losses: Dry gas,		pct	5.90	6.12
H_2O & H_2 in fuel,		pct	5.75	5.78
H_2O in air,		pct	0.15	0.16
Carbon,		pct	0	0
Radiation,		pct	0.53	0.48
Unaccounted for,		pct	1.50	1.50
Total,		pct	13.83	14.04

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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# AC161417969, is complete.

State of Florida Warrant 4 23978[illegible]78, dated 5-31-88 and

in the amount of $ 900.00, was mailed 6-2-88.

DMB/ls

Refund processed on Agency Voucher C 06137

Fiscal Year 88-89

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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# AC161417959, is complete.

State of Florida Warrant 4 23978479, dated 5-31-88 and

in the amount of $900.00, was mailed 6-2-88.

DMB/ls

Refund processed on Agency Voucher C 06137

Fiscal Year 88-89

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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
Mr. T. Frank Lee General Manager

File# AC 161417949, is complete.

State of Florida Warrant 4 2397877, dated 5-31-88 and

in the amount of $ 900.00, was mailed 6-2-88.

DMB/ls

Refund processed on Agency Voucher C 06137

Fiscal Year 88-89

2-15-84

AC 16-141794 Small Disadvantaged Business

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 Craft Corps."

Thanks,
Bonnie

shut down and repairs were begun immediately. The No.2 Recovery Boiler was down for tube repair for about 6 days and was started up on Tuesday, May 10, 1988.

In anticipation of startup of the No.2 Recovery Boiler sometime early the week of May 8, 1988, we rescheduled compliance testing for the Smelt Dissolving Tanks for May 10-12, 1988 in an effort to still meet the May 12, 1988 Consent Order deadline. To do this, we 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, had another commitment scheduled for the May 10-12 period. This doubled the cost of this testing, but we believe this was appropriate in an effort to still meet the Consent Order deadline and avoid requesting an extension under paragraph 39 of the Consent Order.

Unfortunately, this schedule did not quite hold. On the first day of testing (May 10, 1988), the consultant's gas chromatograph failed at the beginning of the Method 16 test on the No.3 Smelt Tank Vent and could not be fixed until late that day. Hence, this test had to be rescheduled to follow testing of the other two smelt tank vents (No.2 on May 11, 1988 and No.1 on May 12, 1988) to Friday, May 13, 1988. However, on May 13 one side of the ESP on the No.3 Recovery Boiler had to be shut down due to problems with the drags. This required a reduction in operating rate under the Consent Order and again forced cancellation of the compliance test on No.3 Smelt Dissolving Tank until Saturday, May 14, 1988. The compliance test on the No.3 Smelt Dissolving test was finally completed on May 14, 1988. In summary, we demonstrated compliance with the TRS emission limiting standards for No.1 Smelt Dissolving Tank on May 12, 1988, No.2 Smelt Dissolving Tank on May 11, 1988 and No.3 Smelt Dissolving Tank on May 14 1988.

As provided for in Section 39, of the Consent Order, Seminole Kraft is hereby notifying the Department that circumstances beyond our reasonable control which could not have been overcome by due diligence have occurred which prevented us from demonstrating compliance with the TRS emission limiting standards on the No.3 Smelt Dissolving Tank by the May 12, 1988 deadline. However, the delay was only two days with the required testing of the No.3 Smelt Dissolving Tank occurring on May 14, 1988. As noted above, the events which caused this minor delay included failure by the Department to issue construction permits until April 4, 1988, an electrical failure which shut down the entire mill, a Recovery Boiler Tube failure which shut down one of the sources to be tested, the failure of the compliance testing

CHF - FYI
send a copy to PCB
-stw
5-20-88

Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

May 16, 1988

Mr. Ernest 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
Suite 412
Jacksonville, FL 32206-4397

RECEIVED
MAY 19 1988
DER - BAQM

Dear Messrs. Frey and Manning:

This is to follow up our May 4, 1988 letter to you regarding the completion of construction and startup of the new scrubbers on the Smelt Dissolving Tanks (Permit Nos. AC 16-141794, -141795 and -141796) in accordance with the Consent Order and our TRS compliance schedule. As noted in that letter, Florida DER did not issue construction permits for these sources until April 4, 1988 and hence we were not able to complete installation of these scrubbers until April 22 (AC-16-151796), April 25 (AC-16-141795) and April 29 (AC-16-141794), 1988 during our mill outage of the same period. Accordingly, the first time we could schedule a consultant to do compliance testing was May 3-5, 1988.

As noted in our earlier letter, 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 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

consultant's gas chromatograph during the Method 16 test on one of the sources and finally, problems with the drags on the No.3 Recovery Boiler ESP. Accordingly, we believe these events constitute a force majure event under the Consent Order and that Seminole Kraft should be granted an extension of time as provided for in the Consent Order.

Please let us know if you have any questions.

Sincerely,

T. Frank Lee
General Manager

ah

CC: Steve Smallwood
John Brown
Wayne Tutt

6-13

Bruce—
pls copy John Brown and check with him what people intend to do about the consent order.
Thanks.

Clair

6-14-88 Done. Sent to MVI for filing.

Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

May 4, 1988

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

RECEIVED
MAY 10 1988
DER-BAQM

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

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 majure 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

copied: Bruce Mitchell

PM
3·16·88
Jacksonville, FL

Airborne Express
6854777634

Full copy

Seminole Kraft Corporation

Jacksonville Mill

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

March 15, 1988

904 751-6400

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

Subject: Publication of Notice of Intent to issue construction permits for No. 1, 2 and 3 Smelt Dissolving Tank Vent Scrubbers

Dear Mr. Thomas:

Please find enclosed the certification of public notice of the above referenced notice of intent. If you have any questions, please contact me.

Sincerely,

Michael L. Riddle

cc: Malcolm Williams
Curt Barton
Frank Lee

Copied: Bruce Mitchell
Pradeep Raval
Khurshid Mehta-BESD
} 3·21·88

AIRBORNE EXPRESS℠

RECEIVER'S COPY

202 (5/86)

ORIGIN | AIRBILL NO.

FROM

SEMINOLE POINT

9669 EASTPOINT RD

JACKSONVILLE FL 32218

STEVE HARRIS 904 751 6400

TO

Central Air Permit Dvision

2600 Blair Stone Road

Tallahassee, FL 32301

Mr. Bill Thomas

BILLING REFERENCE INFORMATION TO APPEAR ON INVOICE

Mike Liddle

RECEIVER'S AIRBORNE EXPRESS ACCOUNT NO.

TYPE OF PACKAGING

- ☐ EXPRESS/AD PACK ENVELOPE
- ☒ LETTER EXPRESS (UP TO 8 OZ.)
- ☐ EXPRESS PACK BOX/TUBE
- ☐ MAG TAPE PACK

DESCRIPTION OF CONTENTS

NO. OF PACKAGES	WEIGHT (LBS.)

SENDER'S C.O.D. $

ROUTING

TLH

3B

BILL CHARGES TO (ASSUMED SENDER UNLESS OTHERWISE SPECIFIED)

- ☒ SENDER
- ☐ RECEIVER
- ☐ 3RD PARTY _____ AIRBORNE EXPRESS ACCOUNT NO.
- ☐ PAID IN ADVANCE $ _____
- CHECK NUMBER _____

TYPE OF SPECIAL SERVICE (EXTRA CHARGES MAY APPLY)

- ☐ SPECIAL PICKUP
- ☐ SATURDAY DELIVERY
- ☐ SPECIAL DELIVERY _____ : TIME
- ☐ HOLD AT AIRBORNE FOR PICKUP (NO CHARGE)
- ☐

34 AIRBORNE SIGNATURE | DATE RECEIVED

TO REMOVE COPY INSERT PENCIL

AC 16-141794
141795
141796

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 March 10, 1988

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

Sworn to and subscribed before me this 10th day of March A.D. 19 88

Bill Champion

Notary Public
State of Florida at Large.

My Commission Expires Feb. 19, 1989

DA 444

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to *Seminole Kraft Corporation* to construct/install new Munters T-271 chevron plate type mist eliminators with duel direction spray nozzles mounted underneath the mist eliminators on the existing Nos. 1, 2 and 3 Smelt Dissolving Tanks. The project will be located at Seminole Kraft Corporation's existing facility in Jacksonville, Duval County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administative 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 Administative Hearings, *Department of Administration*, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dept. of Health, Welfare and Bio-Environmental Services Division
515 West 6th Street
Jacksonville, Florida 32206-4397

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

RECEIVED
MAR 17 1988
DER - BAQM

2/4138
Jacksonville 12

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

RECEIVED
MAR 7 1988
DER - BAQM

March 7, 1988

3/7/88

Mr. Clair Fancy, P.E.
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blairstone Road
Tallahassee, FL 32301

RE: Seminole Kraft Corporation
Construction Permit Application
Lime Slaker

Dear Mr. Fancy:

Bio-Environmental Services Division (BESD) provides the following comments on the captioned application:

A. Section I B. The seal of the Professional Engineer was not affixed to the application.

B. Section II F. The source is in a non-attainment area for the pollutant ozone. This should be stated.

C. Section III A and B. Are the solids figures dry or wet? Please clarify.

D. Section III C. What other pollutants are emitted from this process? Please clarify.

E. Section III D. What is the expected pressure differential across the scrubber during normal operation? A manufacturers specification sheet should be submitted.

F. Attachment F II Please indicate the page number and date of the AP 42 reference for the lime slaker in this section.

The test methods prescribed by Section V are not listed in Attachment F. It is suggested that if particulate matter is the only pollutant then EPA Reference Method No. 5 and EPA RM No. 9 are the applicable methods to demonstrate compliance.

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

Very truly yours,

Jerry E. Woosley

Jerry E. Woosley
Associate Pollution Control Engineer

JEW/mh

cc: Mr. Bill Stewart, P.E.
BESD File 2155 A

disc 6mh/4

Copies Teresa Heron CHF/BT } 3/7/88

Hand Delivered
2-26-88

File Copy

Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

February 25, 1988

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

Dear Mr. Fancy:

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

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

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

No.1 Smelt Dissolving Tank - AC16-141794

No.2 Smelt Dissolving Tank - AC16-141795

No.3 Smelt Dissolving Tank - AC16-141796

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

MR. CLAIR FANCY
FLORIDA DEPARTMENT OF ENVIRONMENTAL
REGULATION

2-26-88

~~CHF~~:
BT:

FYI. Return
to Maggie for
filing. Thanks,
Bruce

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

1. Specific conditions 1,2,3,4,6,9,11 and 12 are all mutually acceptable as written.

2. Specific conditions No.5 and 7b relate to the visible emissions limit of 10% opacity. We agreed at the meeting that these conditions are in accordance with the existing regulations. We also agreed that pending rule development probably will modify the existing visible emissions regulations. When this occurs, we agreed that these permit conditions would be modified accordingly.

3. Specific condition No.7 a and c are acceptable as written.

4. Specific condition No.8 - We agreed to modify this condition to read as follows:

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

5. Specific condition No.10 - We agreed the existing regulations require quarterly reporting. We also agreed that the existing rule is under review within DER and may be modified. We agreed this condition could be modified at a later date to conform with any modification to these reporting requirements.

6. Specific condition No.13 - We agreed that with a construction permit expiration date of January 1, 1989, the first paragraph of this condition is acceptable as written. The second paragraph should be altered to read:

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

7. We agreed that the construction permit expiration date would be January 1, 1989.

8. We agreed that the Notice of Intent could be published in the newspaper as currently written and Seminole Kraft will proceed with such publication.

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

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

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

Sincerely,

Curtis Barton
Manager Environmental Affairs

ah

CC: Mr. Frank Lee
Mr. Malcolm Williams
Mr. Mike Riddle
Mr. Jerry Woosley
Mr. Ernie Frey
Teresa Heron
Bruce Mitchell } 2-26-88 RAM
CH&B/BT

PM
18 Feb. 1988
Jacksonville, FL

file copy

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

February 17, 1988

DER
FEB 22, 1988
3AQM

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

Re: Seminole Kraft Corporation
Smelt Dissolving Tank Nos. 1, 2, and 3
Technical Evaluation and Preliminary Determination
AC 16-141794; AC 16-141795; AC 16-141796

Dear Mr. Fancy:

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

1. It should be specified that the process weight used for calculating the allowable particulate matter emissions (if applicable) should be specified as the green liquor solids rate from the smelt dissolving tank(s). This should be on a dry basis.

2. The TRS specific surrogate monitoring parameters required by Rule 17-2.710(3)(d), Florida Administrative Code (FAC), should be submitted with the operating permit application.

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

Very truly yours,

Jerry E. Woosley

Jerry E. Woosley
Associate Engineer

JEW/bgm

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

Disc: 3, 24 Max Linn
Copied Bruce Mitchell
Pradeep Raval
CHF/BT
} 2.22.88 md

AREA CODE 904 / 630-3210 — NIGHTS/WEEKENDS - 630-3215
515 WEST 6TH STREET / JACKSONVILLE, FLORIDA 32206-4397

BIO-ENVIRONMENTAL SERVICES
Air and Water Pollution Control
515 West 6th Street
Jacksonville, FL 32206-4397

JACKSONVILLE FLA. FEB 18 '88
U.S. POSTAGE 0.22
P.B. METER 1008643

2.22.88

~~CHEY~~ ~~BT~~ FYI

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

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

4. Article Number
P 274 010 452

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X Gail Crumm

6. Signature — Agent
X

7. Date of Delivery

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

FEB 16 1988

PS Form 3811, Feb. 1986 DOMESTIC RETURN RECEIPT

P 274 010 452

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to T. Frank Lee Seminole Kraft Corp. P.O. Box 26998	
P.O., State and ZIP Code 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 2/12/88 AC 16-141794, 95 & 96	

☆ U.S.G.P.O. 1985-480-794

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

February 12, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Lee:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permits for Seminole Kraft Corporation to construct/install new Munters T-271 chevron plate type mist eliminators with dual direction spray nozzles mounted underneath the mist eliminators on the existing Nos. 1, 2 and 3 Smelt Dissolving Tanks. The project will be located at Seminole Kraft Corporation's existing facility in Jacksonville, Duval County, Florida.

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: K. Mehta, BESD
C. Barton, SKC
J. McKinnon, P.E., SKC
B. Pittman, Esq.
Bruce
Pradeep
Reading File } 2-12-88 AA

Technical Evaluation
and
Preliminary Determination

Seminole Kraft Corporation
Duval County
Jacksonville, Florida

State Construction Permits:

Numbers: AC 16-141794
AC 16-141795
AC 16-141796

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

February 12, 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 proposes to install/construct a new scrubber/mist eliminator system for each of the smelt dissolving tanks (SDTs), Nos. 1, 2 and 3.

The project will occur at the applicant's existing facility at the above referenced address in Duval County, Florida. The UTM coordinates are Zone 17, 744.18 km East and 3365.60 km North.

The Standard Industrial Codes are:
Major Group 26: Paper and Allied Products; Industry Group No. 262; Industry No. 2621: Paper Mills

The Standard Classification Codes are:
Pulp and Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
Smelt Dissolving Tank 3-07-001-05 (tons ADUP)

C. Process and Controls

Each smelt dissolving tank receives smelt from its associated recovery boiler (RB) and water is mixed with it to dissolve the smelt and form green liquor. The pollutants that are emitted from this type of process are particulate matter (PM) and total reduced sulfur (TRS). Also, a visible emission (VE) standard exists for these sources.

The control system for each of the SDTs will be a new Munters T-271 chevron plate type mist eliminator with dual direction spray nozzles mounted underneath the mist eliminator. The spray nozzles will be supplied with weak wash, rather than condensate or fresh water, as is currently done. The combination downward/upward spray pattern will provide better gas-liquid

contact, better mist eliminator-liquid contact with no short-circuiting of gas flows and actual demisting action, since the sprays will all be below the modules. The chevron plate design is well recognized as being able to induce good gas-liquid contact with minimal pluggage. Thus, the new scrubber/mist eliminator system will achieve better PM and visible emissions control than the existing control system, while providing TRS emissions scrubbing.

II. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (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 pollutant PM.

As stated before, the SDTs (Nos. 1, 2 & 3) are sources of TRS, PM and visible emissions.

Based on the applicant's response, the Nos. 1, 2 and 3 SDT's are considered existing non-NSPS (new source performance standards) sources.

Prior to submitting the construction permit applications for the SDTs, which was required in accordance with FAC Rule 17-2.960(1)(d)1., the applicant was to establish the maximum process capabilities of raw materials and chemicals through each SDT and its associated RB in accordance with FAC Rule 17-2.960(1)(a). Each source was to be tested in its present physical configuration. Since the mill is under a Consent Order, OGC Case No. 86-1405 (dated October 28, 1986), the SDTs are required to be in final compliance by May 12, 1988, which is a year earlier than FAC Rule 17-2.960(1)(d)1. requires of existing SDTs. Also, the applicant requested a more restrictive PM mass emission limit for each SDT than what would be required pursuant to FAC Rule 17-2.650(2)(c)10., because of issues associated with the PM nonattainment area (NAA) in Duval County and Duval County's Bio-Environmental Services Division (BESD).

Consequently, the DER's Bureau of Air Quality Management (BAQM) and Duval County's BESD considers the situation for the existing SDTs to be exceptional, as described above. Therefore, the demonstration of final compliance through testing will also be used to establish the maximum processing capacity of raw materials and chemicals for each SDT and its associated RB, since the TRS emission limiting standard for each SDT is based on the black liquor solids (BLS) processed in its associated RB. Based on the test results and their evaluations, the construction permits may be amended to reflect these capacities and the appropriate TRS emission limits if they are different from those requested in their applications. The PM allowable mass emission limits will change if the SDTs' actual processing capacities are less than the capacities that their emission limits are based.

The following table exhibits the projected potential pollutant emission from the proposed project in tons per year (TYP):

Table 1

Source	Projected Potential Pollutant Emissions (TPY) PM	TRS
SDT #1	71.0	3.6
SDT #2	82.8	4.6
SDT #3	82.8	4.6
Total:	236.6	12.8

Note: o PM - mass emission limit is more restrictive than FAC Rule 17-2.650(2)(c)10. requires

o TRS - emission standard is 0.048 lb/3000 lbs BLS pursuant to FAC Rule 17-2.600(4)(c)4.a.

a. #1: 51,500 lbs/hr BLS 27,000 lbs/hr GLS
b. #2: 65,900 lbs/hr BLS 34,532 lbs/hr GLS
c. #3: 65,900 lbs/hr BLS 34,532 lbs/hr GLS

(GLS - green liquor solids)

o Annual hours of operation are 8760

Since the SDTs 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. 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 SDTs are subject to the provisions of FAC Rules 17-2.600(4)(c)4.a. and 17-2.600(4)(c)4.b. According to FAC Rule 17-2.600(4)(c)4.a., the emission limiting standard is 0.048 pound per each 3000 pounds black liquor solids as hydrogen sulfide (H_2S). According to FAC Rule 17-2.600(4)(c)4.b., the SDTs shall be in compliance with FAC Rule 17-2.710, Continuous Emission Monitoring, and FAC Rule 17-2.960(1), Compliance Schedules, except where more restrictive requirements are imposed in the Consent Order, OGC Case No. 86-1405.

Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the SDTs shall be in compliance with FAC Rules 17-2.710(3)(d), Establishing Specific Surrogate Parameters, and 17-2.710(4), Quarterly Reporting Requirements. The SDTs are subject to the provisions of FAC Rule 17-4.140, Reports.

The PM mass emission limit requested by the applicant is more restrictive than FAC Rule 17-2.650(2((c)10. and the DER's BAQM and Duval County's BESD accept the limit requested. Actually, the allowable PM emission limit requested by the applicant is the same as that established in their existing operating permits.

According to FAC Rule 17-2.650(2)(c)10.b., no owner or operator of a SDT shall cause, permit or allow visible emissions greater than Number 1/2 on the Ringelmann Chart (10 percent opacity).

Compliance tests for TRS shall be conducted using EPA Methods 16 or 16A pursuant to FAC Rule 17-2.700(6)(b)16. Compliance tests for PM shall be conducted using EPA Method 5 pursuant to FAC Rule 17-2.700(6)(b)5. Compliance tests for VE shall be conducted using EPA Method 9 pursuant to FAC Rule 17-2.700(6)(b)9.

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

Objectionable odors shall not be allowed off of the plant property pursuant to FAC Rule 17-2.620(2).

III. Summary of Emissions

A. Emission Limitations

The regulated pollutants from the proposed project are TRS and PM. A VE standard also exists for SDTs. The following table exhibits the maximum allowable emission standards/limits for the SDTs:

Table 2

Source	Pollutant	Maximum Allowable Pollutant Emission Standard/Limit
SDT #1	TRS	0.048 lb/3000 lbs BLS (0.82 lb/hr; 3.6 TPY)
	PM	16.2 lbs/hr; 71.0 TPY
	VE	10% opacity or less
SDT #2	TRS	0.048 lb/3000 lbs BLS (1.05 lbs/hr; 4.6 TPY)
	PM	18.9 lbs/hr; 82.8 TPY
	VE	10% opacity or less
SDT #3	TRS	0.048 lb/3000 lbs BLS (1.05 lbs/hr; 4.6 TPY)
	PM	18.9 lbs/hr; 82.8 TPY
	VE	10% opacity or less

Note: 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 Rules contained in FAC Rule 17-2 and to install control systems 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 SDT than what FAC Rule 17-2 would require and the DER's BAQM and Duval County's BESD accepts the requests and feels that the limits are achievable. Consideration was given to the applicant on establishing the maximum process capacity of raw materials and chemicals for each SDT and its associated RB because of the accelerated final compliance date pursuant to the Consent Order, OGC Case No. 86-1405.

Based on the final compliance test results and their evaluations, the permits may be amended to reflect the actual maximum processing capacity of raw materials and chemicals for each SDT and its associated RB if they are different than what was requested in their applications. Also, since the SDTs' TRS emission limiting standard is based on the RB's processing capacity of BLS, a change in the PSD associated TRS allowable emission limits may be required (lbs/hr, TPY). The PM allowable mass emission limits will change if the SDTs' actual processing capacities are less than the capacities that their emission limits are based.

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.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Applications for Permits by:

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

DER File No. AC 16-141794
AC 16-141795
AC 16-141796

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, applied on November 12, 1987, to the Department of Environmental Regulation for permits to construct/install new Munters T-271 chevron plate type mist eliminators with duel direction spray nozzles mounted underneath the mist eliminators on the existing Nos. 1, 2 and 3 Smelt Dissolving Tanks. The project will be located at the Seminole Kraft Corporation's existing facility in Jacksonville, Duval County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit was needed for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, 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, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code 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 application. 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:

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

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 2-12-88.

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 Willis
Clerk

2-12-88
Date

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.

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Seminole Kraft Corporation to construct/install new Munters T-271 chevron plate type mist eliminators with duel direction spray nozzles mounted underneath the mist eliminators on the existing Nos. 1, 2 and 3 Smelt Dissolving Tanks. The project will be located at Seminole Kraft Corporation's existing facility in Jacksonville, Duval County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned 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 application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dept. of Health, Welfare and Bio-
Environmental Services Division
515 West 6th Street
Jacksonville, Florida 32206-4397

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

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 16-141794
Expiration Date: August 10, 1988
County: Duval
Latitude/Longitude: 30° 25' 15"N/ 81° 36' 00" W
Project: No. 1 Smelt Dissolving Tank

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

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

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

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

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141794
Expiration Date: August 10, 1988

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.

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.

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.

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

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

2. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H_2S) shall not exceed 0.048 pound per 3000 pounds black liquor solids (0.82 lb/hr or 3.6 tons/yr and based on a projected maximum processing capacity of 51,500 lbs/hr black liquor solids (BLS) in the No. 1 recovery boiler (RB) - equivalent to 27,000 lbs/hr green liquor solids (GLS)).

SPECIFIC CONDITIONS:

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

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

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

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

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

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

b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources

c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

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

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

Issued this_____day of_____, 19__.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

_____
Dale Twachtmann, Secretary

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 16-141795
Expiration Date: August 10, 1988
County: Duval
Latitude/Longitude: 30° 25' 15"N/ 81° 36' 00" W
Project: No. 2 Smelt Dissolving Tank

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

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

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

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

Attachments to be Incorporated:

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

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.

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.

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.

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

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

2. Total reduced sulfur emissions (TRS) as hydrogen sulfide (H_2S) shall not exceed 0.048 pound per 3000 pounds black liquor solids (1.05 lbs/hr or 4.6 tons/yr and based on a projected maximum processing capacity of 65,900 lbs/hr black liquor solids (BLS) in the No. 2 recovery boiler (RB) - equivalent to 34,532 lbs/hr green liquor solids (GLS)).

SPECIFIC CONDITIONS:

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

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

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

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

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

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

b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources

c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

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

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

Issued this_____day of_____, 19__.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

_____
Dale Twachtmann, Secretary

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 16-141796
Expiration Date: August 10, 1988
County: Duval
Latitude/Longitude: 30° 25' 15"N/ 81° 36' 00" W
Project: No. 3 Smelt Dissolving Tank

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

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

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

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

Attachments to be Incorporated:

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

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.

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.

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.

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

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

2. Total reduced sulfur emissions (TRS) as hydrogen sulfide (H_2S) shall not exceed 0.048 pound per 3000 pounds black liquor solids (1.05 lbs/hr or 4.6 tons/yr and based on a projected maximum processing capacity of 65,900 lbs/hr black liquor solids (BLS) in the No. 3 recovery boiler (RB) - equivalent to 34,532 lbs/hr green liquor solids (GLS)).

SPECIFIC CONDITIONS:

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

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

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

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

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

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

b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources

c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

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

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

Issued this____day of_____, 19__.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

_____
Dale Twachtmann, Secretary

PM
Hand Delivered
1-26-88

File Copy

Seminole Kraft Corporation

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

904 751-6400

January 22, 1988

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-condensible 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.

Maggie 1-29-97

I have cycled

Brian
Pradeep
CHF/BT

Brian

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 out 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	1,185,000
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-condensible 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

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:

Item	Final Compliance Dates
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.

Source	Fee Submitted	Actual Required
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
	$10,000	$1,000
Refund Due:	$ 9,000	

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
Bruce Mitchell } 1-27-88
CHF/BT
Bradenp Raval

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 Kiln - $E = 3.59\ (11.09)^{0.62} = 16$ lb/hr

#2 Kiln - $E = 3.59\ (11.17)^{0.62} = 16$ lb/hr

#3 Kiln - $E = 3.59\ (11.17)^{0.62} = 16$ 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 acccepting these original limits to avoid an emission increase.

#1 Dissolver - $E = 3.59\ (11.35)^{0.62} = 16.2$ lb/hr

#2 Dissolver - $E = 3.59\ (14.52)^{0.62} = 18.9$ lb/hr

#3 Dissolver - $E = 3.59\ (14.52)^{0.62} = 18.9$ 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 Dissolver - $\frac{0.048 \text{ lb}}{3000 \text{ \#BLS}} \times \frac{51{,}500 \text{ lb BLS}}{\text{hr}} = .82$ lb/hr

#2 Dissolver - $\frac{0.048 \text{ lb}}{3000 \text{ \#BLS}} \times \frac{65.900 \text{ lb BLS}}{\text{hr}} = 1.05$ lb/hr

#3 Dissolver - $\frac{0.048 \text{ lb}}{3000 \text{ \#BLS}} \times \frac{65.900 \text{ lb BLS}}{\text{hr}} = 1.05$ lb/hr

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT
3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
904/798-4200

Mr. T. Frank Lee
General Manager
Seminole Kraft Corporation
P. O. Box 26998
Jacksonville, Florida 32218-0998

DER
JAN 04 1988
BAQM

Re: Seminole Kraft Mill
Production Capacity
November 10, 1987, Letter

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 that 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

Donald C. Bayly
Interim Deputy Director

State of Florida
Dept. of Environmental Regulation

Ernest E. Frey
District Manager

DCB/EEF/ecr

cc: BESD File 2155
Disc 2, 25
~~Mr.~~ Clair Fancy, P.E., DER
Copied: ~~CHF~~/BT
Bruce Mitchell
Pradeep Raval } 1.4.88

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).

3. What lime kiln will be designated as the primary combustion source for incinerating the TRS gases that will be collected and transportated by the noncondensible 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.

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

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 x 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.

AREA CODE 904 / 630-3210 — NIGHTS/WEEKENDS - 630-3215
515 WEST 6TH STREET / JACKSONVILLE, FLORIDA 32206-4207

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-condensible 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

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

December 10, 1987

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

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT
3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
904/798-4200

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

904 751-6400

November 11, 1987

DER

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: 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
No.2 Dissolving Tank
No.3 Dissolving Tank
No.1 & 2 Batch Digester System
No.1 Line Multi-Effect Evaporator
No.2 Line Multi-Effect Evaporator
No.3 Line Multi-Effect Evaporator
No.1 Lime Kiln
No.2 Lime Kiln
No.3 Lime Kiln

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

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

file copy
Receipt # 76193
V # 9391
Pd $1000.00
AC 16-141796

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

DER

NOV 12 1987

BAQM

NORTHEAST DISTRICT

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New[1] [x] Existing[1]

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 Dissolving Tank

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: _____

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)

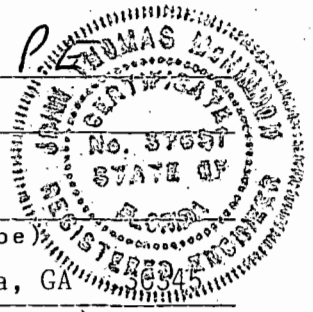
the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the 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)

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 March 1, 1988 Completion of Construction April 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.)

New scrubber and associated piping - $7500.00

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

Operating Permit - A016-71211

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 Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. _____

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? _____

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? _____

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		
Molten Smelt	NA	NA	34,532	10

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

1. Total Process Input Rate (lbs/hr): 34,532 lbs/hr Green Liquor Solids

2. Product Weight (lbs/hr): 34,532 lbs/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	18.6	73	(a) $E=3.59\ P^{0.62}$	18.6	(b) 739,987	370	10
TRS	1.05	4.6	(d) .048#/3000 #BLS	1.05	(c) 964,257	482	

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

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

(a) 17-2 ..650 (2) (10) (b)
(b) AP-42
(c) EPA 450/2-78-0036
(d) 17-2.600 (4) (c) (4)

$$\frac{3.7 \text{ lbs. trs}}{\text{Ton Pulp}} \times \frac{714 \text{ Tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = \frac{964{,}257 \text{ lbs. TRS}}{\text{year}}$$

$$= 482 \frac{\text{tons}}{\text{year}}$$

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)
Munter T-271	Particulate	*	NA	See Attachment A
(Scrubber/Mist Eliminator)	TRS	*	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.

_____

_____

_____

_____

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

Stack Height: 123.5 ft. Stack Diameter: 3.958 ft.

Gas Flow Rate: 10,950 ACFM 5638 DSCFM Gas Exit Temperature: 165 °F.

Water Vapor Content: 36-38 % Velocity: 15 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 Diamter: _____ 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.):

The recovered chemicals are returned to the process.

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).

   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

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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 _____( ) SO^2* _____ 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

Smelt Dissolving Tank Vent No.3 Construction Permit Application

Smelt Dissolving Tank Vent No.3 is currently equipped with a York Separators, Inc. demister pad with overhead water showers. This installation was designed for particulate removal, not TRS scrubbing. Our stack tests indicated that the current mist eliminators cannot meet the TRS emission limits. These tests and mill operating experience indicate that this is caused by pluggage-induced short-circuiting and poor gas-liquid contact.

This construction permit will cover the installation of new Munters T-271 chevron plate type mist eliminators with dual direction spray nozzles mounted underneath the mist eliminators. The spray nozzles will be supplied with weak wash, rather than condensate or fresh water, as currently done. The combination downward/upward spray pattern will provide better gas-liquid contact, better mist eliminator-liquid contact with no short-circuiting of gas flows and actual demisting action, since the sprays are all below the modules. The chevron plate design is well recognized as being able to induce good gas-liquid contact with minimal pluggage. Thus, the new scrubber/mist eliminator system will achieve better particulate control while providing TRS scrubbing. Based on past industry experience with these devices, the smelt dissolving tank vent will comply with the limits set in the TRS rule.

Copies of the Munters design specifications are attached.

September 22, 1987

Stone Container Corporation
2150 Parklake Drive Suite 400
Atlanta, Georgia 30345

Attention: John McKinnon
Regional Manager, Environmental Services

Subject: Mist Eliminator Proposal
Dissolving Tank Vent Stacks
Munters E-045-4623-A1

Dear Mr. McKinnon:

As requested, we quote on T-271 mist eliminator assemblies for the 3 vessels currently installed at the Seminole Kraft Mill, as shown in the enclosed sketch, sk-4623A1, and the proposed data sheet.

In addition, I am telefaxing copies of this proposal to Bert Rhyne, so he can copy to Mike Riddle, Malcolm Williams, Bobby Cudd, Bill Adams and Tom Carradine, as well as sending a copy of our Pulp and Paper installation list by Express Mail to the Mill.

Installation of the mist eliminator assemblies requires only the removal of the mesh pads, the sliding in of the blank-off plate and mist eliminator assemblies, and the changing of the spray manifolds.

The upper spray manifold can be left in place, but should not be used except on shutdowns, since part of the spray will inevitably go up the stack if operated when the boiler is running.

The continuous supply of weak wash on the lower spray can be part of a recirculation system, if you cannot have the total volume going into the dissolving tank. Do not attempt to use condensate or softened water, except in an emergency basis. Regular mill water will tend to develop scale on the mist eliminator surfaces, if used for more than a short period.

The Munters Corporation
1205 Sixth Street Southeast 33907
P.O. Box 6428 Fort Myers, Florida 33911
813/936-1555 Telex: 5-2785

On behalf of all of us at Munters Corporation and Seeco, Inc., we would like to thank you for your consideration of our equipment. Our local representative, Dennis Faust, will be in touch with you within the near future to review the project and our proposal. In the interim, should you require clarification of our offer or any additional information, please do not hesitate to contact either of us. We look forward to working with you toward the successful completion of this project.

Very truly yours,

THE MUNTERS CORPORATION

Robert H. Lace, Sr.

Robert H. Lace, Sr.
Product Sales Manager
Gas Cleaning Division

RHL/ tj

Enclosure: Munters' Standard Terms and Conditions

cc: SEECO
325 John Knox Road
Tallahassee, Florida 32303

Munters

PROPOSAL DATA SHEET 9/22/87
FOR: Seminole Kraft
PROJECT: Dissolving Tank Vent Stack
FILE NO.: E -045-4623-A1
EQUIPMENT TYPE: T-271-S

1.0	**Operating Data**		
1.1	Capacity; acfm	10000	8000
1.2	Operating temperature; °F	.190	190
1.3	Net face area; sq.ft.	11.9	9.5
1.4	Average face velocity; fpm	840	840
1.5	Operating pressure; in. w.c.,est.	2.0	2.0
1.6	Mist eliminator pressure drop; in. w.c.	0.22	0.22
1.7	Limit drop; um	40	40

1.8 Separation efficiency; 99% for Limit drop diameter and larger droplets.

Expected operating performance is conditional upon a gas flow at the face of the mist eliminator not to exceed plus or minus 25% of the average face velocity and maintaining the mist eliminator elements in an operably clean condition.

2.0	**Mechanical Design**		
2.1	Module dimensions:		
	Height; in.	6.5	6.5
	Width; in. each of 2	23 1/2	22 3/4
	Depth; in.	88	76
2.2	Quantity:		
	No. of stages:	1	1
	Modules/stage:	2	2

3.0	**Material of Construction**		
3.1	Mist eliminator and spray nozzles	304 s.s.	304 s.s.
3.2	Supports and manifold piping	C.S.	C.S.

4.0	**Pricing**		
	Total assembly each	$3590.00	$3140.00

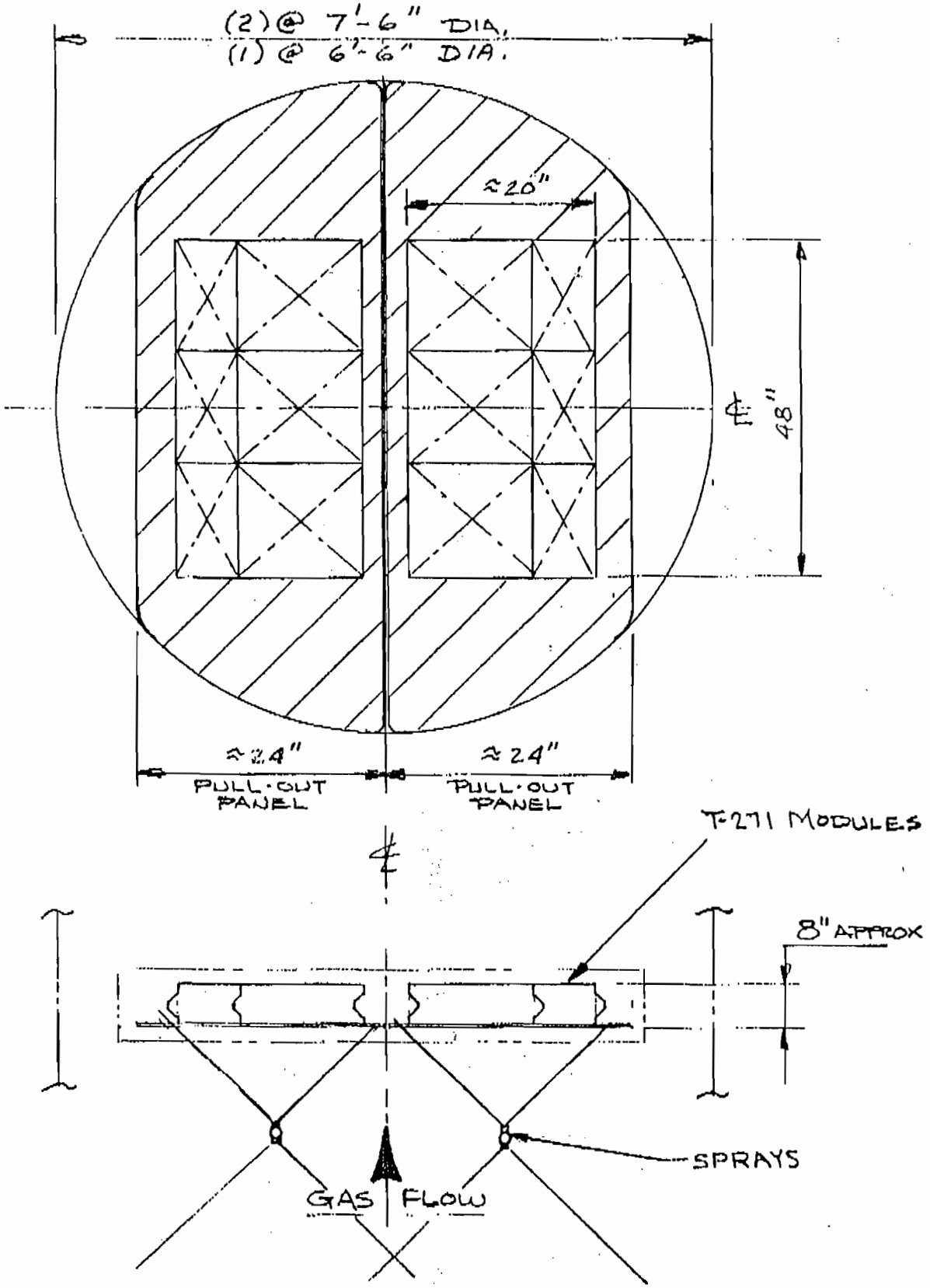
X2 = 7,180
TOTAL $10,320

5.0 **Schedule**

Anticipated shipment is 6 weeks from receipt of approved drawings. We would expect to forward drawings for approval within 2 weeks after our receipt and acceptance of an order.

6.0 **Scope/Terms**

The prices quoted above are based on our design, fabrication and supply of the equipment described herein; are F.O.B. Fort Myers, Florida; shipment freight collect; and exclude all Local, State and Federal Taxes. Payment terms are 1% 10 days, net 30 days upon shipment and our offer is valid for 60 days. Acceptance of this offer is expressly limited to the terms of this offer which include the attached Standard Terms and Conditions of Sale.


(2) @ 7'-6" DIA.
(1) @ 6'-6" DIA.
≈20"
48"
℄
≈24"
PULL-OUT PANEL
≈24"
PULL-OUT PANEL
℄
T-271 MODULES
8" APPROX
SPRAYS
GAS FLOW

September 24, 1987

Seminole Kraft
Box 18019
Jacksonville, Florida 32229

Attention: Bert Rhyne

Subject: Mist Eliminator Proposal
Dissolving Tank Vent Stacks
Munters E-045-4623-A1

Dear Mr. Rhyne:

This is to confirm my statement that we guarantee to meet current Florida particulate and TRS emission requirements for existing boilers, when the dissolving tank mist eliminator and spray systems are operated in accordance with our recommendations. If these were to be required to meet new source standards, we would quote on our media as well, to insure maximum liquid/gas mass transfer.

We look forward to working with you on this project.

On behalf of all of us at Munters Corporation and Seeco, Inc., we would like to thank you for your consideration of our equipment. Our local representative, Dennis R. Faust, will be in touch with you within the near future to review the project and our proposal. In the interim, should you require clarification of our offer or any additional information, please do not hesitate to contact either of us. We look forward to working with you toward the successful completion of this project.

Very truly yours,

THE MUNTERS CORPORATION

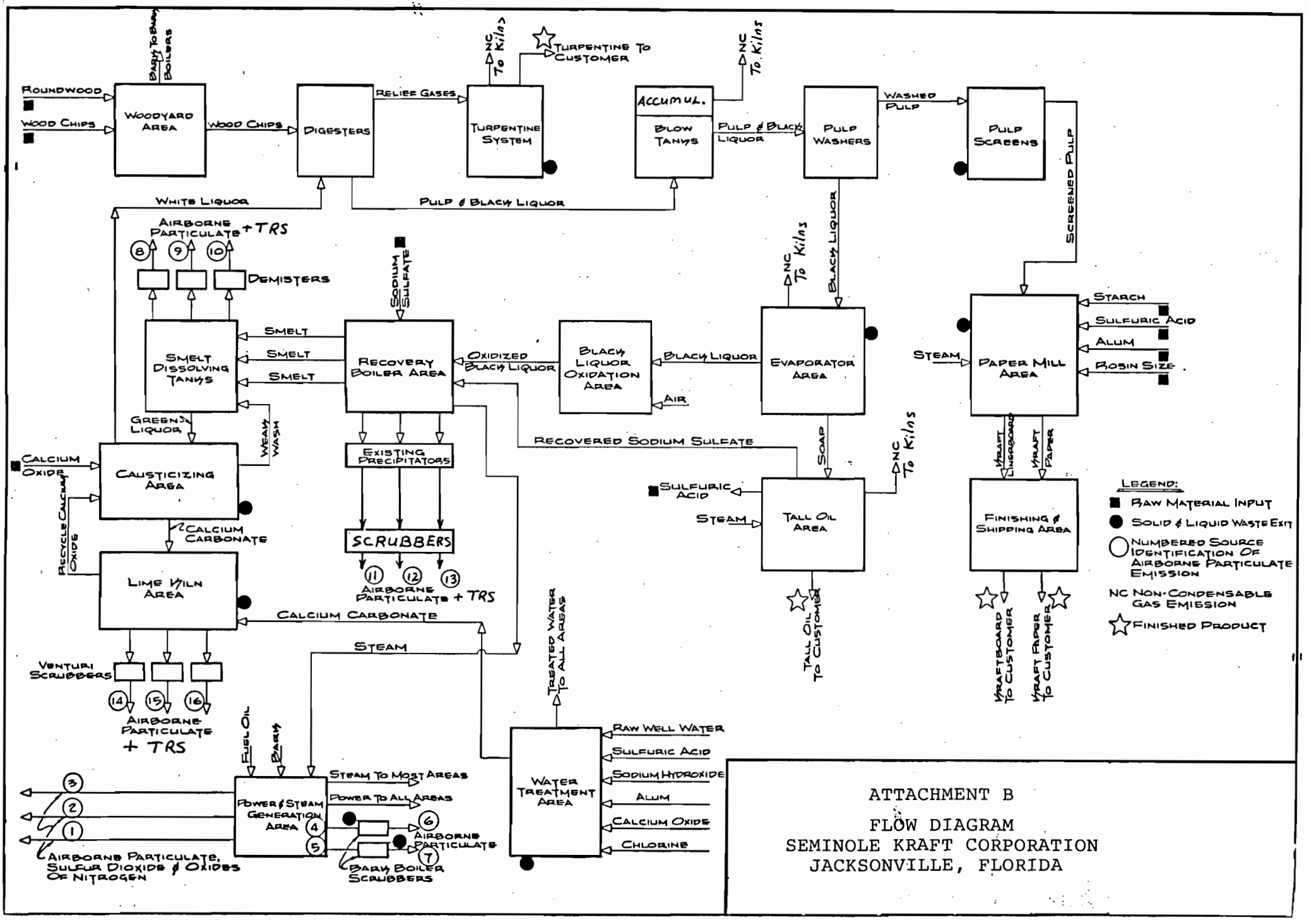
Robert H. Lace, Sr.
Product Sales Manager
Gas Cleaning Division

RHL/cp

cc: John McKinnon
Stone Container

cc: SEECO, INC.
Attention: Mr. Dennis Faust
P. O. Box 3034
Tallahassee, FL 32315
(904) 385-8093

The Munters Corporation
1205 Sixth Street Southeast 33907
P.O. Box 6428 Fort Myers, Florida 33911
813/936-1555 Telex: 5-2785

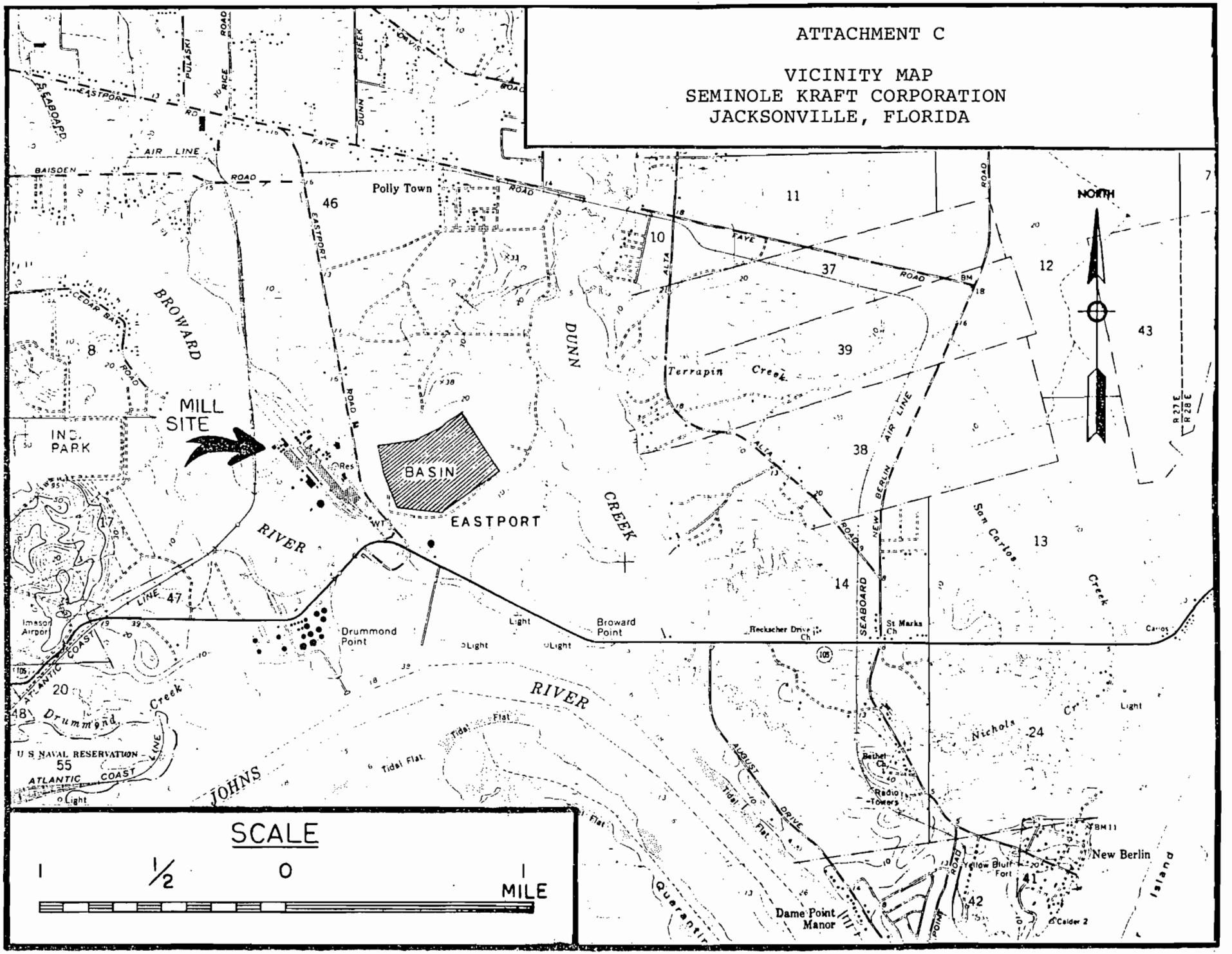


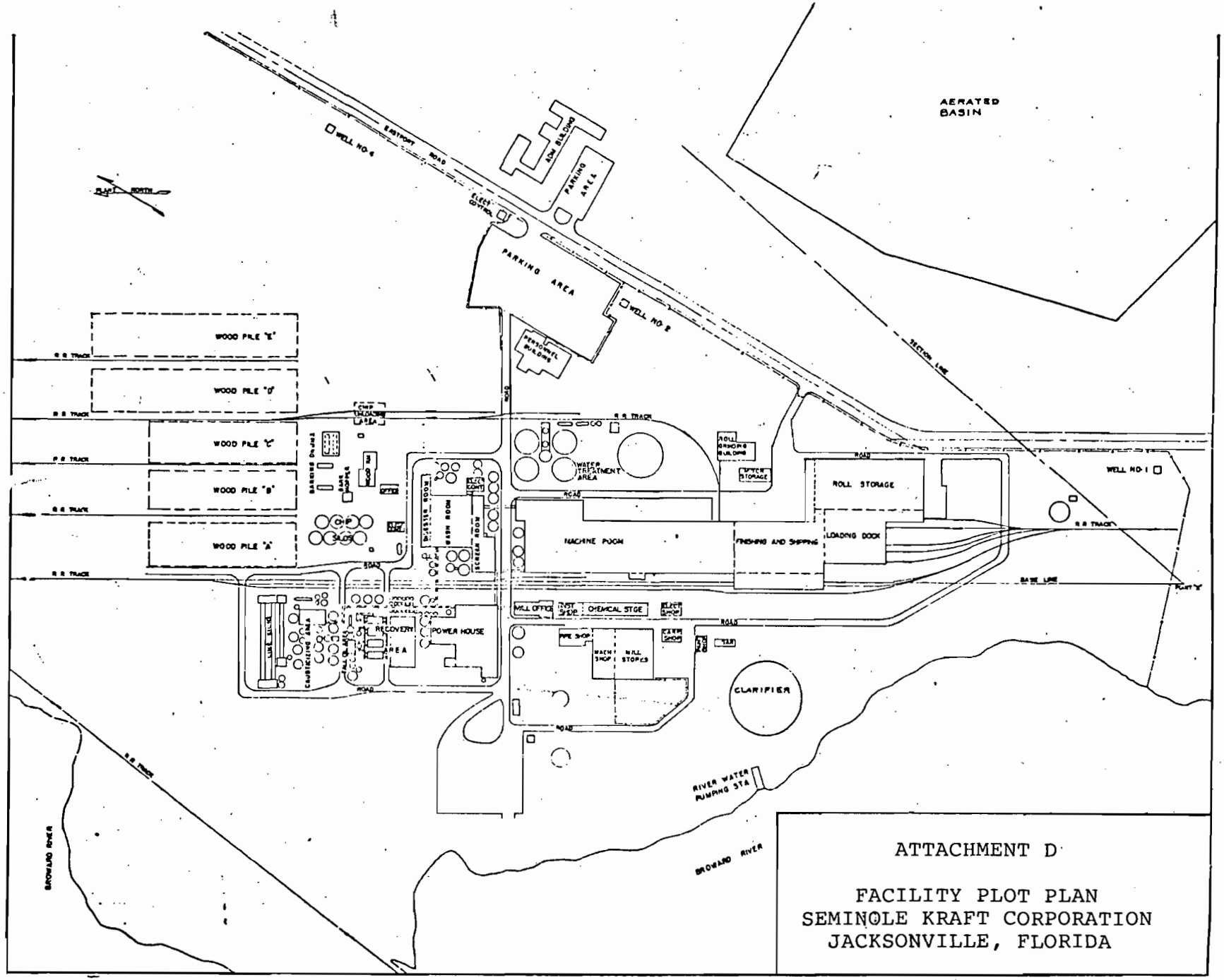
ATTACHMENT B

FLOW DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

ATTACHMENT C

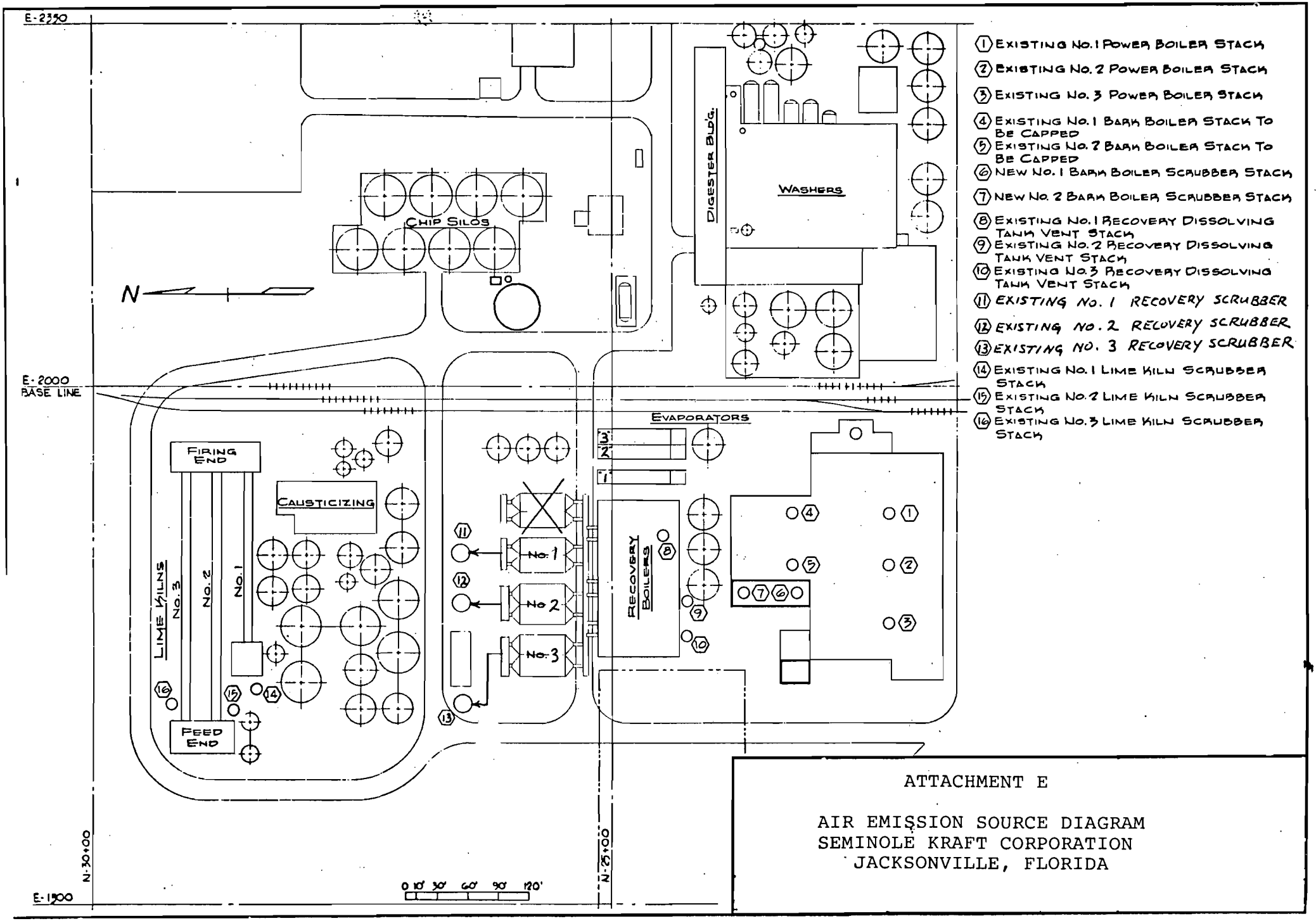
VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





ATTACHMENT D

FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



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

File Copy
Receipt # 76193
V# 9390
Pd $1000.00

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION AC 16-141795

DER

NOV 12 1987

BAQM

NORTHEAST DISTRICT

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New[1] [x] Existing[1]

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. 2 Dissolving Tank

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: _____

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)

Suite 400, 2150 Parklake Drive, Atlanta, GA 30345
Mailing Address (Please Type)

JOHN THOMAS MCKINNON CERTIFICATE No. 37697 STATE OF FLORIDA REGISTERED ENGINEER

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 March 1, 1988 Completion of Construction April 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.)

New scrubber and associated piping - $7500.00

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

Operating Permit - A016-71210

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 Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. _____

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? _____

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? _____

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		
Molten Smelt	NA	NA	34,532	9

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

1. Total Process Input Rate (lbs/hr): 34,532 lbs/hr Green Liquor Solids

2. Product Weight (lbs/hr): 34,532 lbs/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	18.6	73	(a) E=3.59 P$^{0.62}$	18.6	(b) 739,987	370	9
TRS	(d) 1.05	4.6	.048#/3000 #BLS	1.05	(c) 964,257	482	

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).
(a) 17-2. 650 (2) (10) (b)
(b) AP-42
(c) EPA 450/2-78-003 b
(d) 17-2.600 (4) (c) (4)

$$\frac{3.7 \text{ lbs. TRS}}{\text{ton pulp}} \times \frac{714 \text{ tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = 964{,}257 \frac{\text{lbs. TRS}}{\text{year}}$$

$$= 482 \frac{\text{tons}}{\text{year}}$$

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)
Munter T-271	Particulate	*	NA	See Attachment A
(Scrubber/Mist Eliminator)	TRS	*	NA	See Attachment A
	* will meet applicable emission limits			

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.

The recovered chemicals are returned to the process.

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

Stack Height: 123.5 ft. Stack Diameter: 3.958 ft.

Gas Flow Rate: 10,660 ACFM 6130 DSCFM Gas Exit Temperature: 160 °F.

Water Vapor Content: 33 % Velocity: 15 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 Diamter: _____ 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.):

The recovered chemicals are returned to the process.

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).

   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

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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 _____( ) SO^2* _____ 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

Smelt Dissolving Tank Vent No.2 Construction Permit Application

Smelt Dissolving Tank Vent No.2 is currently equipped with a York Separators, Inc. demister pad with overhead water showers. This installation was designed for particulate removal, not TRS scrubbing. Our stack tests indicated that the current mist eliminators cannot meet the TRS emission limits. These tests and mill operating experience indicate that this is caused by pluggage-induced short-circuiting and poor gas-liquid contact.

This construction permit will cover the installation of new Munsters T-271 chevron plate type mist eliminators with dual direction spray nozzles mounted underneath the mist eliminators. The spray nozzles will be supplied with weak wash, rather than condensate or fresh water, as currently done. The combination downward/upward spray pattern will provide better gas-liquid contact, better mist eliminator-liquid contact with no short-circuiting of gas flows and actual demisting action, since the sprays are all below the modules. The chevron plate design is well recognized as being able to induce good gas-liquid contact with minimal pluggage. Thus, the new scrubber/mist eliminator system will achieve better particulate control while providing TRS scrubbing. Based on past industry experience with these devices, the smelt dissolving tank vent will comply with the limits set in the TRS rule.

Copies of the Munters design specifications are attached.

September 22, 1987

Stone Container Corporation
2150 Parklake Drive Suite 400
Atlanta, Georgia 30345

Attention: John McKinnon
Regional Manager, Environmental Services

Subject: Mist Eliminator Proposal
Dissolving Tank Vent Stacks
Munters E-045-4623-A1

Dear Mr. McKinnon:

As requested, we quote on T-271 mist eliminator assemblies for the 3 vessels currently installed at the Seminole Kraft Mill, as shown in the enclosed sketch, sk-4623A1, and the proposed data sheet.

In addition, I am telefaxing copies of this proposal to Bert Rhyne, so he can copy to Mike Riddle, Malcolm Williams, Bobby Cudd, Bill Adams and Tom Carradine, as well as sending a copy of our Pulp and Paper installation list by Express Mail to the Mill.

Installation of the mist eliminator assemblies requires only the removal of the mesh pads, the sliding in of the blank-off plate and mist eliminator assemblies, and the changing of the spray manifolds.

The upper spray manifold can be left in place, but should not be used except on shutdowns, since part of the spray will inevitably go up the stack if operated when the boiler is running.

The continuous supply of weak wash on the lower spray can be part of a recirculation system, if you cannot have the total volume going into the dissolving tank. Do not attempt to use condensate or softened water, except in an emergency basis. Regular mill water will tend to develop scale on the mist eliminator surfaces, if used for more than a short period.

The Munters Corporation
1205 Sixth Street Southeast 33907
P.O. Box 6428 Fort Myers, Florida 33911
813/936-1555 Telex: 5-2785

On behalf of all of us at Munters Corporation and Seeco, Inc., we would like to thank you for your consideration of our equipment. Our local representative, Dennis Faust, will be in touch with you within the near future to review the project and our proposal. In the interim, should you require clarification of our offer or any additional information, please do not hesitate to contact either of us. We look forward to working with you toward the successful completion of this project.

Very truly yours,

THE MUNTERS CORPORATION

Robert H. Lace, Sr.

Robert H. Lace, Sr.
Product Sales Manager
Gas Cleaning Division

RHL/ tj

Enclosure: Munters' Standard Terms and Conditions

cc: SEECO
325 John Knox Road
Tallahassee, Florida 32303

Munters

PROPOSAL DATA SHEET 9/22/87
FOR: Seminole Kraft
PROJECT: Dissolving Tank Vent Stack
FILE NO.: E -045-4623-A1
EQUIPMENT TYPE: T-271-S

1.0	**Operating Data**		
1.1	Capacity; acfm	10000	8000
1.2	Operating temperature; °F	.190	190
1.3	Net face area; sq.ft.	11.9	9.5
1.4	Average face velocity; fpm	840	840
1.5	Operating pressure; in. w.c.,est.	2.0	2.0
1.6	Mist eliminator pressure drop; in. w.c.	0.22	0.22
1.7	Limit drop; um	40	40
1.8	Separation efficiency; 99% for Limit drop diameter and larger droplets.		

Expected operating performance is conditional upon a gas flow at the face of the mist eliminator not to exceed plus or minus 25% of the average face velocity and maintaining the mist eliminator elements in an operably clean condition.

2.0	**Mechanical Design**		
2.1	Module dimensions:		
	Height; in.	6.5	6.5
	Width; in. each of 2	23 1/2	22 3/4
	Depth; in.	88	76
2.2	Quantity:		
	No. of stages:	1	1
	Modules/stage:	2	2

3.0	**Material of Construction**		
3.1	Mist eliminator and spray nozzles	304 s.s.	304 s.s.
3.2	Supports and manifold piping	C.S.	C.S.

4.0	**Pricing**		
	Total assembly each	$3590.00	$3140.00

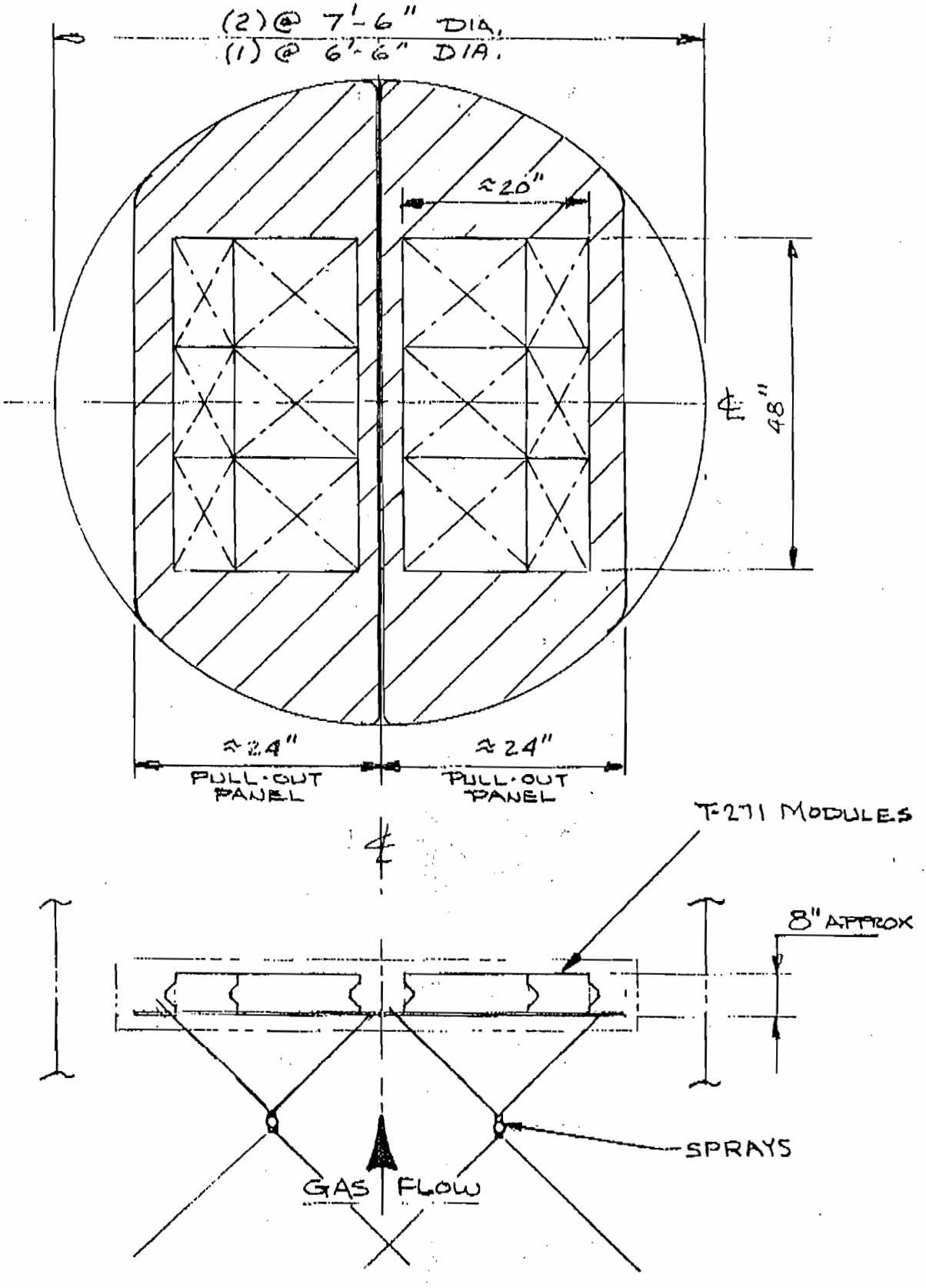
X2 = 7,180
TOTAL $10,320

5.0 **Schedule**

Anticipated shipment is 6 weeks from receipt of approved drawings. We would expect to forward drawings for approval within 2 weeks after our receipt and acceptance of an order.

6.0 **Scope/Terms**

The prices quoted above are based on our design, fabrication and supply of the equipment described herein; are F.O.B. Fort Myers, Florida; shipment freight collect; and exclude all Local, State and Federal Taxes. Payment terms are 1% 10 days, net 30 days upon shipment and our offer is valid for 60 days. Acceptance of this offer is expressly limited to the terms of this offer which include the attached Standard Terms and Conditions of Sale.


(2) @ 7'-6" DIA.
(1) @ 6'-6" DIA.
≈20"
48"
≈24"
PULL-OUT PANEL
≈24"
PULL-OUT PANEL
T-271 MODULES
8" APPROX
SPRAYS
GAS FLOW

September 24, 1987

Seminole Kraft
Box 18019
Jacksonville, Florida 32229

Attention: Bert Rhyne

Subject: Mist Eliminator Proposal
Dissolving Tank Vent Stacks
Munters E-045-4623-A1

Dear Mr. Rhyne:

This is to confirm my statement that we guarantee to meet current Florida particulate and TRS emission requirements for existing boilers, when the dissolving tank mist eliminator and spray systems are operated in accordance with our recommendations. If these were to be required to meet new source standards, we would quote on our media as well, to insure maximum liquid/gas mass transfer.

We look forward to working with you on this project.

On behalf of all of us at Munters Corporation and Seeco, Inc., we would like to thank you for your consideration of our equipment. Our local representative, Dennis R. Faust, will be in touch with you within the near future to review the project and our proposal. In the interim, should you require clarification of our offer or any additional information, please do not hesitate to contact either of us. We look forward to working with you toward the successful completion of this project.

Very truly yours,

THE MUNTERS CORPORATION

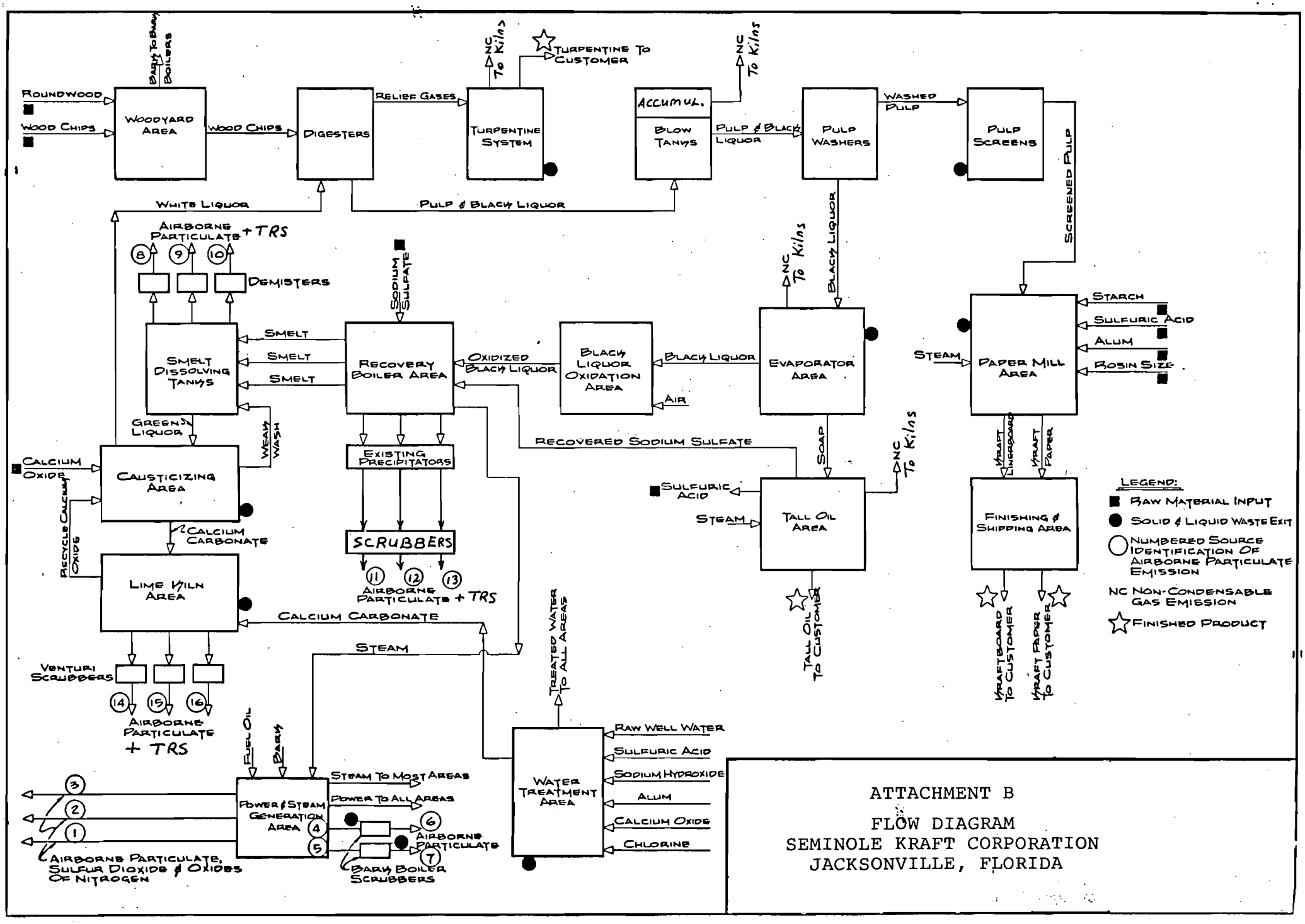
Robert H. Lace, Sr.
Product Sales Manager
Gas Cleaning Division

RHL/cp

cc: John McKinnon
Stone Container

cc: SEECO, INC.
Attention: Mr. Dennis Faust
P. O. Box 3034
Tallahassee, FL 32315
(904) 385-8093

The Munters Corporation
1205 Sixth Street Southeast 33907
P.O. Box 6428 Fort Myers, Florida 33911
813/936-1555 Telex: 5-2785

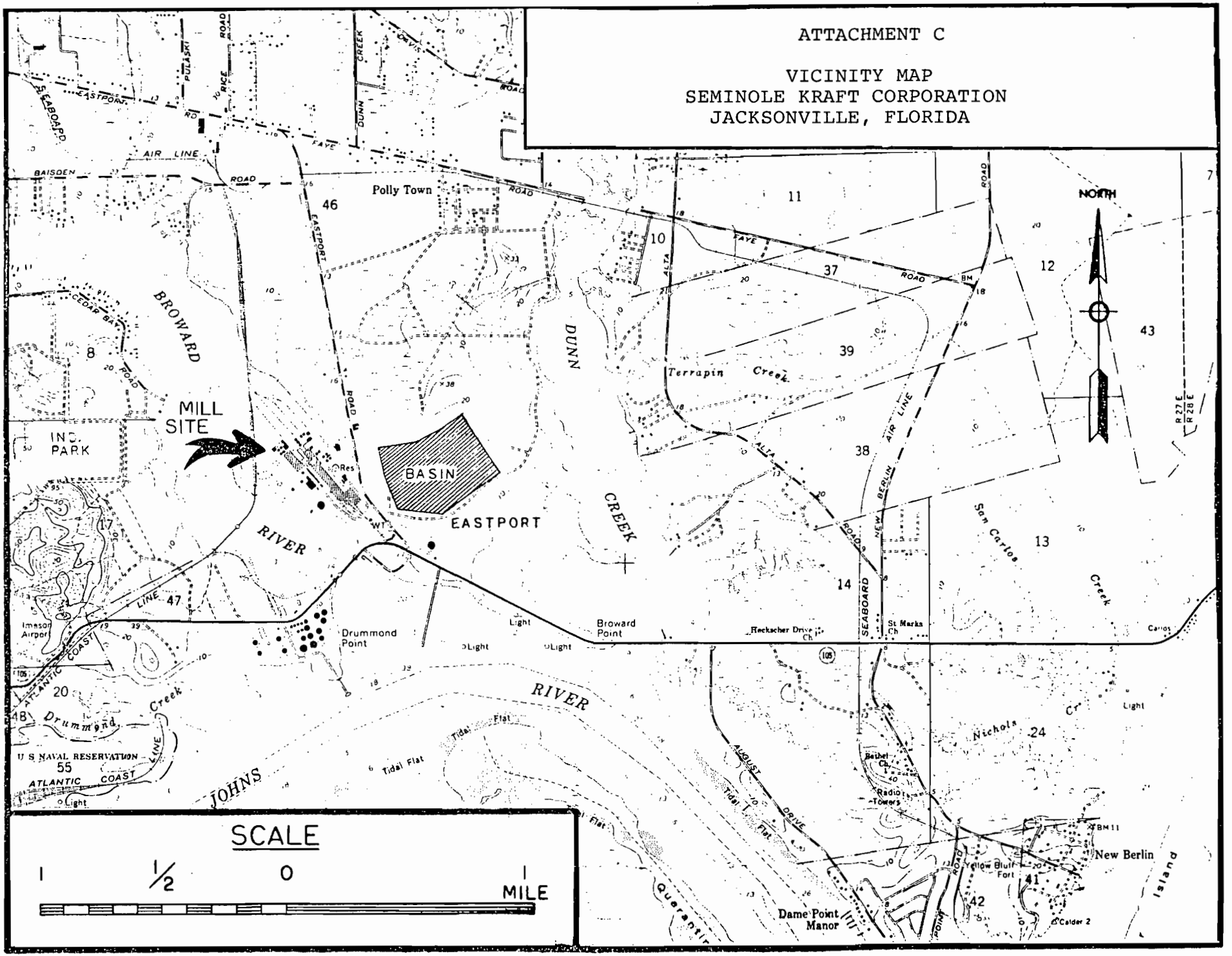


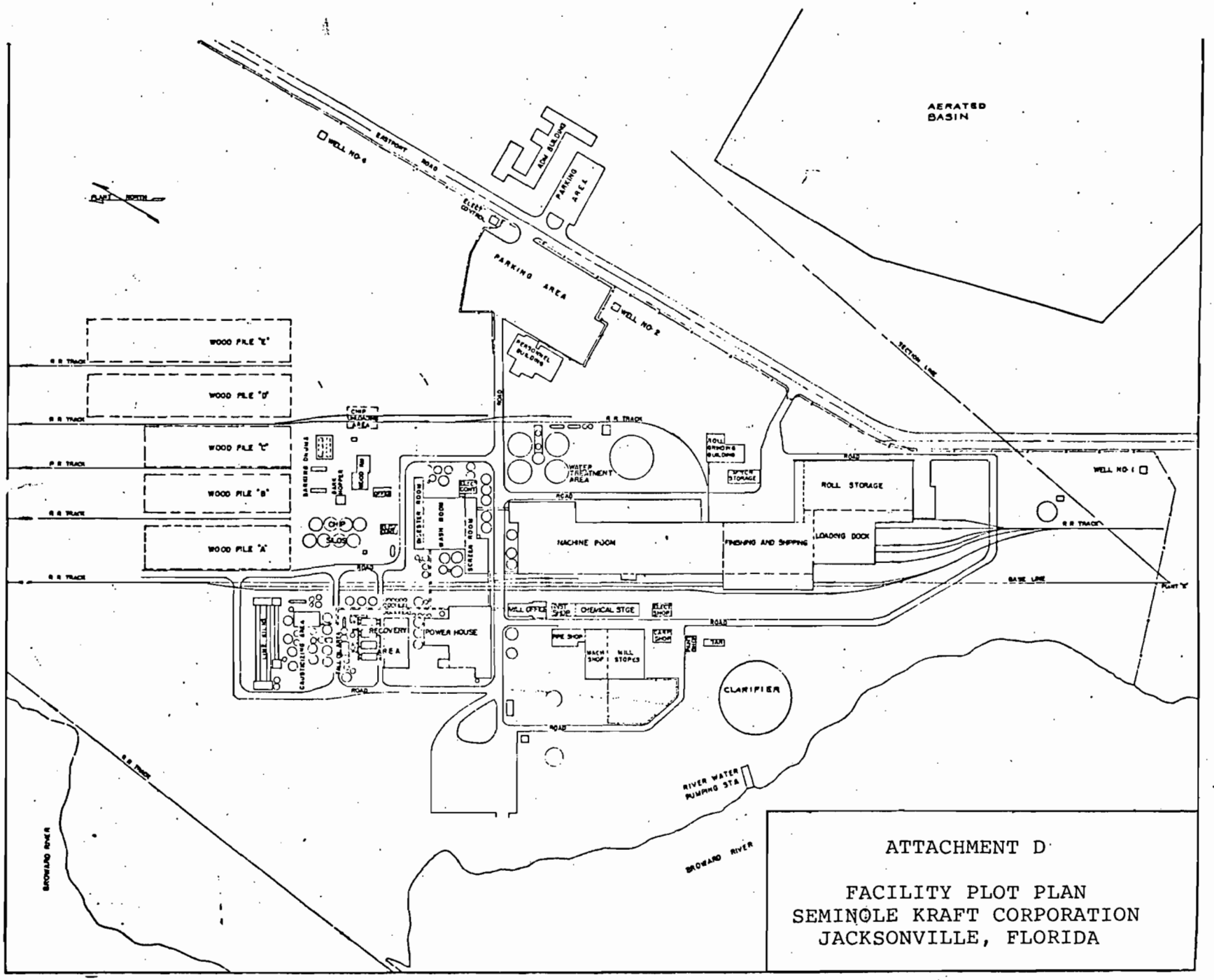
ATTACHMENT B

FLOW DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

ATTACHMENT C

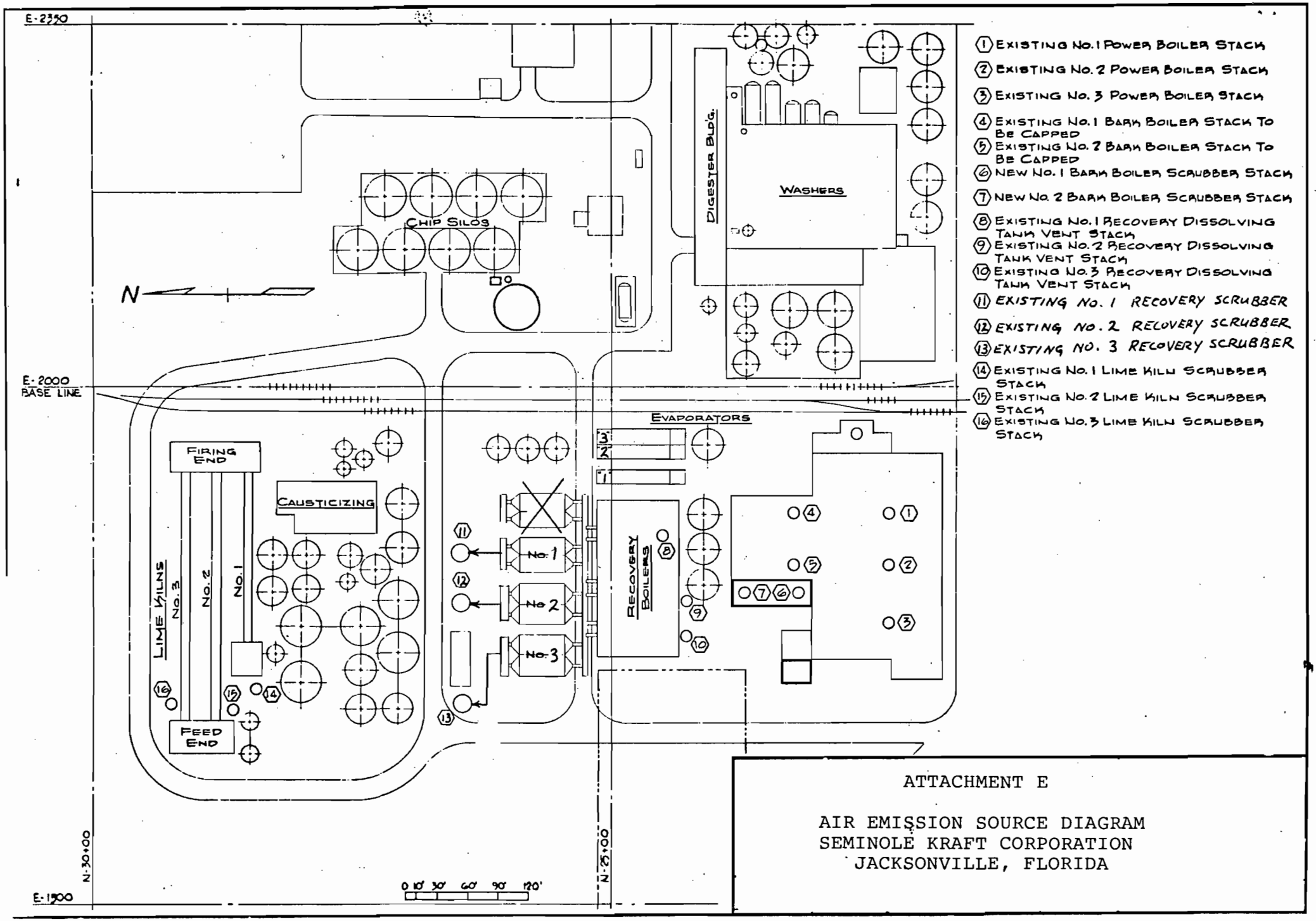
VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





ATTACHMENT D

FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



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

File Copy
Receipt #76193
V# 9389
Pd $1000.00
AC16-141794

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

DER

NOV 12 1987

BAQM

NORTHEAST DISTRICT

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New[1] [x] Existing[1]

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 Dissolving Tank

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: _____

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)

Suite 400, 2150 Parklake Dr., 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 March 1, 1988 Completion of Construction April 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.)

New scrubber and associated piping - $7500.00

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

Operating Permit - A016-71209

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? N/A

   a. If yes, has "offset" been applied?

   b. If yes, has "Lowest Achievable Emission Rate" been applied?

   c. If yes, list non-attainment pollutants.

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI.

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII.

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source?

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source?

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? N/A

   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		
Molten Smelt	NA	NA	27,000	8

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

1. Total Process Input Rate (lbs/hr): 27,000 lbs/hr Green Liquor Solids

2. Product Weight (lbs/hr): 27,000 lbs./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	16.2	64	$E=3.59P^{0.62}$ (a)	16.2	575,501	288	8
TRS	0.82	3.6	.048#/3000#BLS (d)	0.82	753,579	377	

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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
(d) 17-2.600 (4) (c) (4)

$$\frac{3.7 \text{ lbs. TRS}}{\text{Ton Pulp}} \times \frac{558 \text{ tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = \frac{753,579 \text{ lbs. TRS}}{\text{year}}$$

$$= 377 \frac{\text{tons}}{\text{year}}$$

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)
Munters T-271	Particulate	*	NA	see attachmt A
(Scrubber/Mist Eliminator)	TRS	*	NA	see attachmt A
	* Will meet applicable emission limits			

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.

The recovered chemicals are returned to the process.

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

Stack Height: 120.0 ft. Stack Diameter: 3.5 ft.

Gas Flow Rate: 8050 ACFM 4614 DSCFM Gas Exit Temperature: 160 °F.

Water Vapor Content: 34 % Velocity: 14 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 Diamter: _____ 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.):

The recovered chemicals are returned to the process.

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 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

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

Contaminant	Rate or Concentration

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

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

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height: ft.

b. Diameter: ft.

c. Flow Rate: ACFM

d. Temperature: °F.

e. Velocity: FPS

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

1.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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 _____( ) SO^2* _____ 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

Smelt Dissolving Tank Vent No.1 Construction Permit Application

Smelt Dissolving Tank Vent No.1 is currently equipped with a York Separators, Inc. demister pad with overhead water showers. This installation was designed for particulate removal, not TRS scrubbing. Our stack tests indicated that the current mist eliminators cannot meet the TRS emission limits. These tests and mill operating experience indicate that this is caused by pluggage-induced short-circuiting and poor gas-liquid contact.

This construction permit will cover the installation of new Munters T-271 chevron plate type mist eliminators with dual direction spray nozzles mounted underneath the mist eliminators. The spray nozzles will be supplied with weak wash, rather than condensate or fresh water, as currently done. The combination downward/upward spray pattern will provide better gas-liquid contact, better mist eliminator-liquid contact with no short-circuiting of gas flows and actual demisting action, since the sprays are all below the modules. The chevron plate design is well recognized as being able to induce good gas-liquid contact with minimal pluggage. Thus, the new scrubber/mist eliminator system will achieve better particulate control while providing TRS scrubbing. Based on past industry experience with these devices, the smelt dissolving tank vent will comply with the limits set in the TRS rule.

Copies of the Munters design specifications are attached.

September 22, 1987

Stone Container Corporation
2150 Parklake Drive Suite 400
Atlanta, Georgia 30345

Attention: John McKinnon
Regional Manager, Environmental Services

Subject: Mist Eliminator Proposal
Dissolving Tank Vent Stacks
Munters E-045-4623-A1

Dear Mr. McKinnon:

As requested, we quote on T-271 mist eliminator assemblies for the 3 vessels currently installed at the Seminole Kraft Mill, as shown in the enclosed sketch, sk-4623A1, and the proposed data sheet.

In addition, I am telefaxing copies of this proposal to Bert Rhyne, so he can copy to Mike Riddle, Malcolm Williams, Bobby Cudd, Bill Adams and Tom Carradine, as well as sending a copy of our Pulp and Paper installation list by Express Mail to the Mill.

Installation of the mist eliminator assemblies requires only the removal of the mesh pads, the sliding in of the blank-off plate and mist eliminator assemblies, and the changing of the spray manifolds.

The upper spray manifold can be left in place, but should not be used except on shutdowns, since part of the spray will inevitably go up the stack if operated when the boiler is running.

The continuous supply of weak wash on the lower spray can be part of a recirculation system, if you cannot have the total volume going into the dissolving tank. Do not attempt to use condensate or softened water, except in an emergency basis. Regular mill water will tend to develop scale on the mist eliminator surfaces, if used for more than a short period.

The Munters Corporation
1205 Sixth Street Southeast 33907
P.O. Box 6428 Fort Myers, Florida 33911
813/936-1555 Telex: 5-2785

On behalf of all of us at Munters Corporation and Seeco, Inc., we would like to thank you for your consideration of our equipment. Our local representative, Dennis Faust, will be in touch with you within the near future to review the project and our proposal. In the interim, should you require clarification of our offer or any additional information, please do not hesitate to contact either of us. We look forward to working with you toward the successful completion of this project.

Very truly yours,

THE MUNTERS CORPORATION

Robert H. Lace, Sr.

Robert H. Lace, Sr.
Product Sales Manager
Gas Cleaning Division

RHL/ tj

Enclosure: Munters' Standard Terms and Conditions

cc: SEECO
325 John Knox Road
Tallahassee, Florida 32303

Munters

PROPOSAL DATA SHEET 9/22/87
FOR: Seminole Kraft
PROJECT: Dissolving Tank Vent Stack
FILE NO.: E -045-4623-A1
EQUIPMENT TYPE: T-271-S

1.0	**Operating Data**		
1.1	Capacity; acfm	10000	8000
1.2	Operating temperature; °F	.190	190
1.3	Net face area; sq.ft.	11.9	9.5
1.4	Average face velocity; fpm	840	840
1.5	Operating pressure; in. w.c.,est.	2.0	2.0
1.6	Mist eliminator pressure drop; in. w.c.	0.22	0.22
1.7	Limit drop; um	40	40
1.8	Separation efficiency; 99% for Limit drop diameter and larger droplets.		

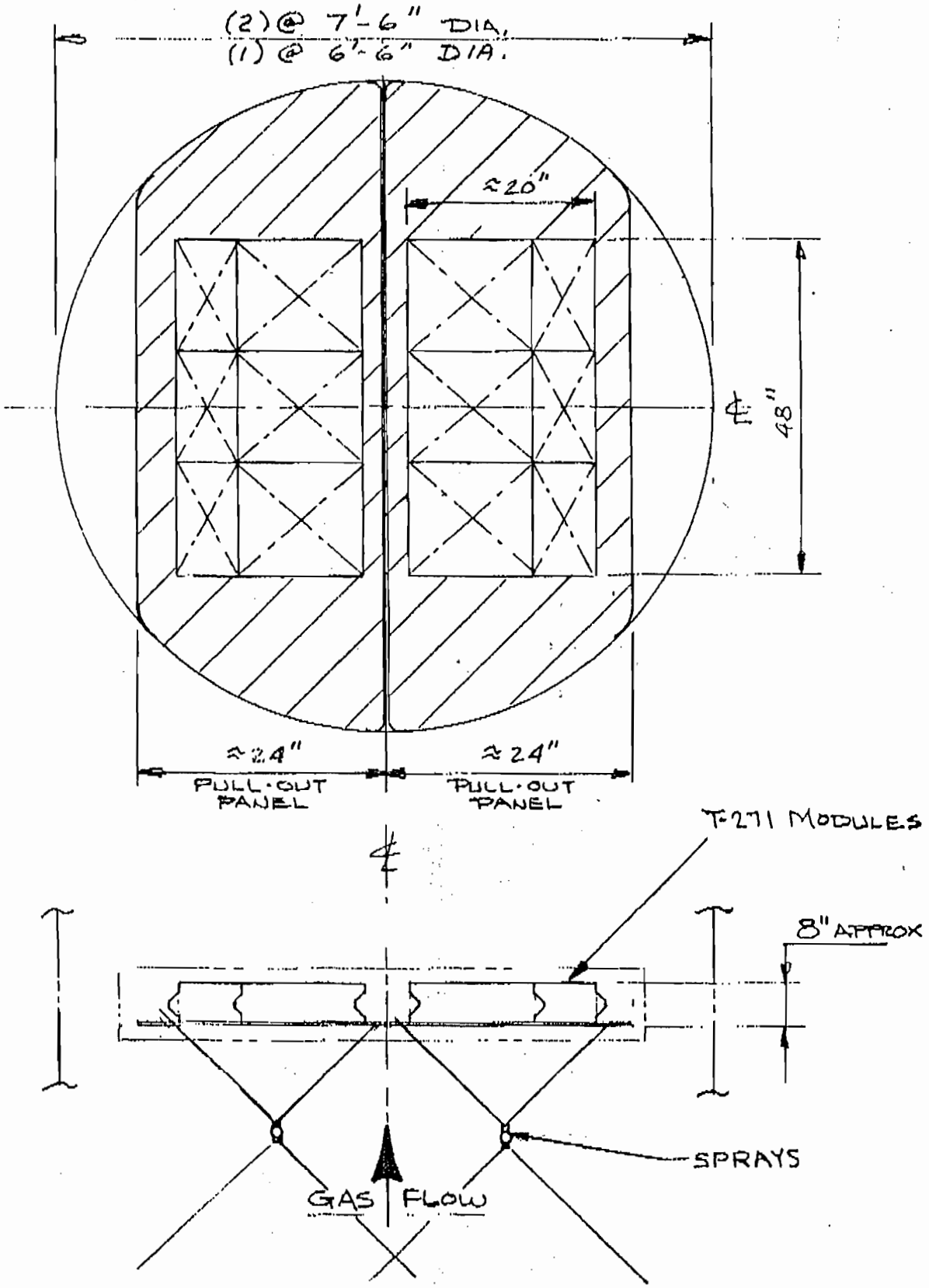
Expected operating performance is conditional upon a gas flow at the face of the mist eliminator not to exceed plus or minus 25% of the average face velocity and maintaining the mist eliminator elements in an operably clean condition.

2.0	**Mechanical Design**		
2.1	Module dimensions:		
	Height; in.	6.5	6.5
	Width; in. each of 2	23 1/2	22 3/4
	Depth; in.	88	76
2.2	Quantity:		
	No. of stages:	1	1
	Modules/stage:	2	2
3.0	**Material of Construction**		
3.1	Mist eliminator and spray nozzles	304 s.s.	304 s.s.
3.2	Supports and manifold piping	C.S.	C.S.
4.0	**Pricing**		
	Total assembly each	$3590.00	$3140.00

X2 = 7,180
TOTAL $10,320

5.0 **Schedule**
Anticipated shipment is 6 weeks from receipt of approved drawings. We would expect to forward drawings for approval within 2 weeks after our receipt and acceptance of an order.

6.0 **Scope/Terms**
The prices quoted above are based on our design, fabrication and supply of the equipment described herein; are F.O.B. Fort Myers, Florida; shipment freight collect; and exclude all Local, State and Federal Taxes. Payment terms are 1% 10 days, net 30 days upon shipment and our offer is valid for 60 days.
Acceptance of this offer is expressly limited to the terms of this offer which include the attached Standard Terms and Conditions of Sale.


(2) @ 7'-6" DIA.
(1) @ 6'-6" DIA.
≈20"
48"
≈24"
PULL-OUT PANEL
≈24"
PULL-OUT PANEL
T-271 MODULES
8" APPROX
SPRAYS
GAS FLOW

September 24, 1987

Seminole Kraft
Box 18019
Jacksonville, Florida 32229

Attention: Bert Rhyne

Subject: Mist Eliminator Proposal
Dissolving Tank Vent Stacks
Munters E-045-4623-A1

Dear Mr. Rhyne:

This is to confirm my statement that we guarantee to meet current Florida particulate and TRS emission requirements for existing boilers, when the dissolving tank mist eliminator and spray systems are operated in accordance with our recommendations. If these were to be required to meet new source standards, we would quote on our media as well, to insure maximum liquid/gas mass transfer.

We look forward to working with you on this project.

On behalf of all of us at Munters Corporation and Seeco, Inc., we would like to thank you for your consideration of our equipment. Our local representative, Dennis R. Faust, will be in touch with you within the near future to review the project and our proposal. In the interim, should you require clarification of our offer or any additional information, please do not hesitate to contact either of us. We look forward to working with you toward the successful completion of this project.

Very truly yours,

THE MUNTERS CORPORATION

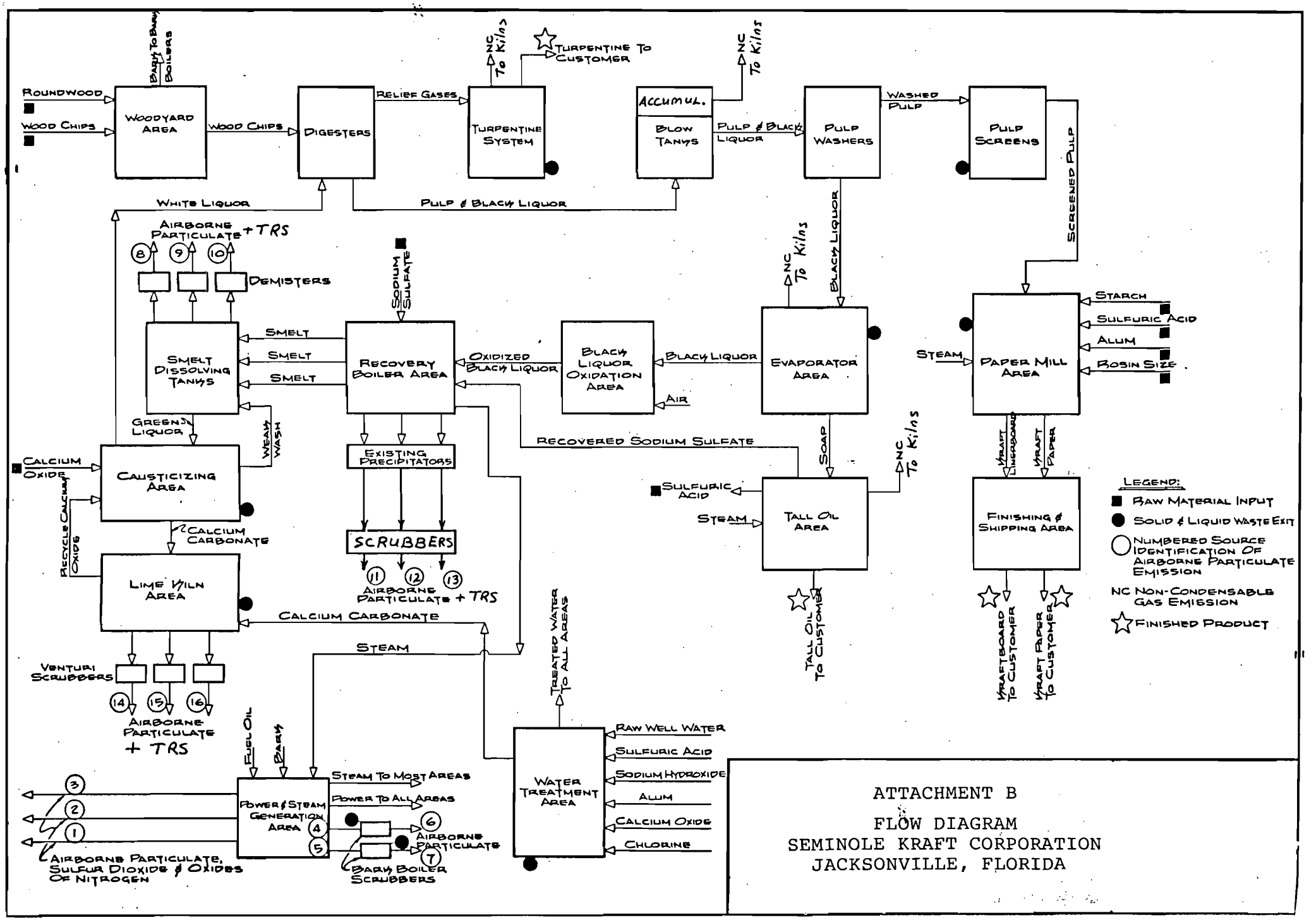
Robert H. Lace, Sr.
Product Sales Manager
Gas Cleaning Division

RHL/cp

cc: John McKinnon
Stone Container

cc: SEECO, INC.
Attention: Mr. Dennis Faust
P. O. Box 3034
Tallahassee, FL 32315
(904) 385-8093

The Munters Corporation
1205 Sixth Street Southeast 33907
P.O. Box 6428 Fort Myers, Florida 33911
813/936-1555 Telex: 5-2785

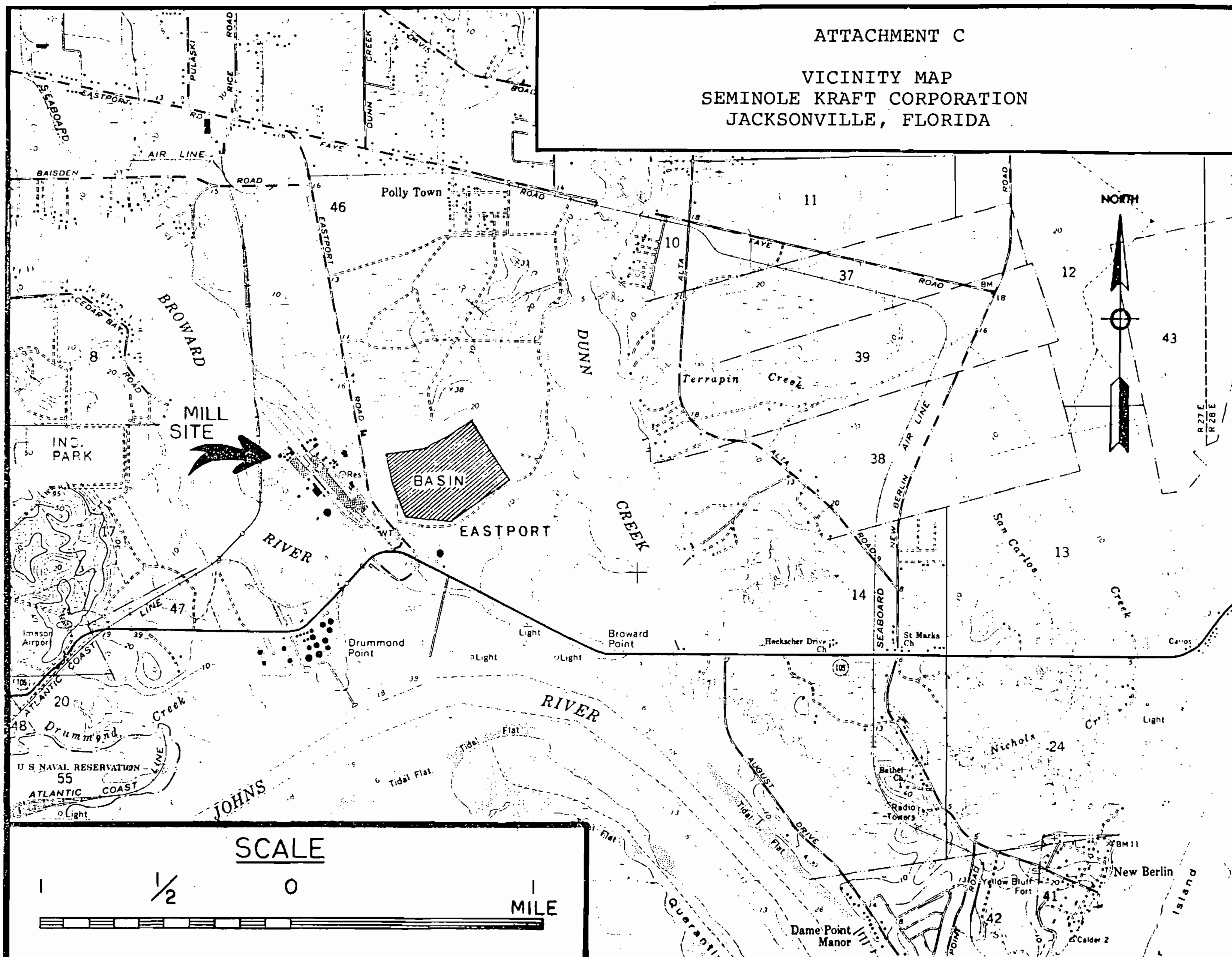


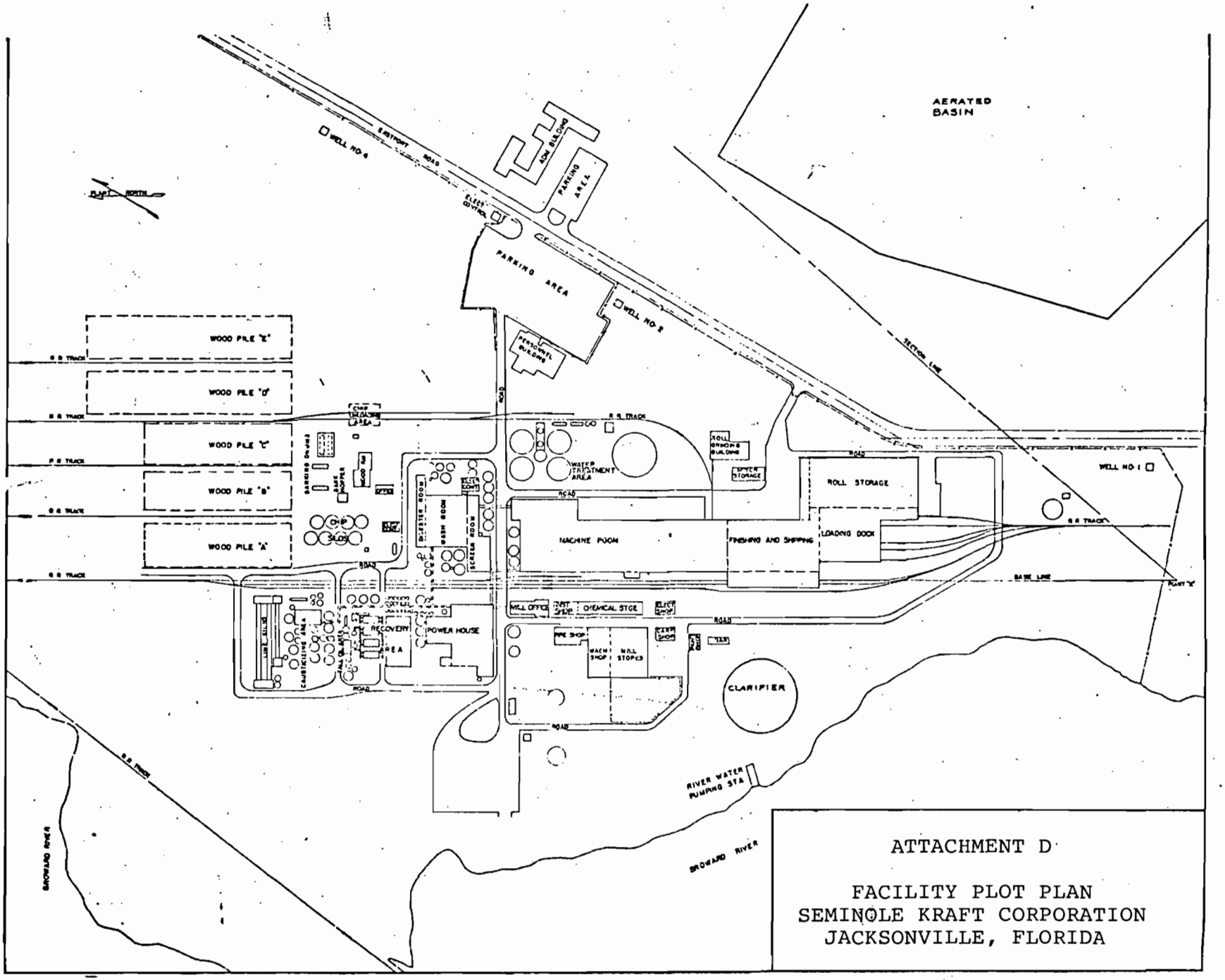
ATTACHMENT B

FLOW DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

ATTACHMENT C

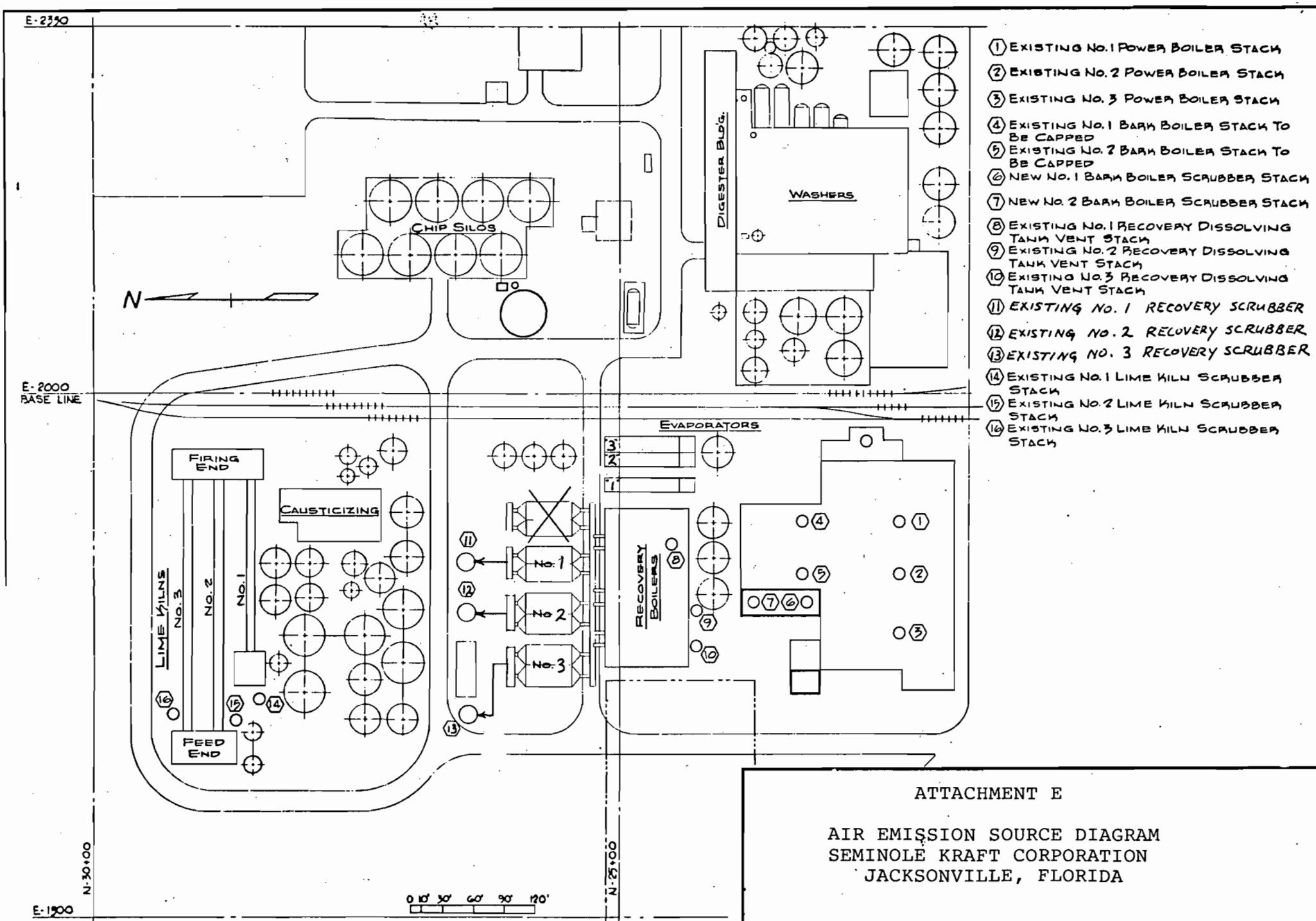
VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





ATTACHMENT D

FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



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

11/12/87 Hand Delivered by John McKinnon PM

File Copy

AC16-141794
-141795
-141796

Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

DER

NOV 12 1987

BAQM

November 10, 1987

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

each cook. Each cook requires 138 minutes to complete. The maximum pulp production can be calculated as follows:

$$(13 \text{ digesters}) \left(\frac{1440 \text{ Minutes}}{\text{day}}\right) \left(\frac{\text{cook}}{138 \text{ minutes}}\right) = 136 \frac{\text{cooks}}{\text{day}}$$

$$\left(\frac{136 \text{ cooks}}{\text{day}}\right) \left(\frac{14.08 \text{ MDT}}{\text{cook}}\right) = 1915 \frac{\text{MDT pulp}}{\text{day}}$$

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

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

CHF/BT 11-12-87 RAW

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[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	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

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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)

1. Total Process Input Rate (lbs/hr): 65,900 #BLS/hour (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	13
TRS	12.2	53.6	17.5 ppm	12.2	9,461,189	4,731	13

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

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

a) 17-2.600(4)
b) 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)

1. Total Process Input Rate (lbs/hr): 27,000 # Green liquor solids

2. 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) $E=3.59P^{0.62}$	16.2	(b) 575,501	288	
TRS	N/A		N/A	N/A	(c) 753,579	377	

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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)

1. Total Process Input Rate (lbs/hr): 34,532 #Green liquor solids

2. 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	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	(a) E=3.59P 0.62	18.6	(b) 739,987	370	
TRS	N/A		N/A	N/A	(c) 964,257	482	

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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)

1. Total Process Input Rate (lbs/hr): 34,532 # Green liquor solids

2. 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	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	(a) $E=3.59P^{0.62}$	18.6	(b) 739,987	370	
TRS	N/A		N/A	N/A	(c) 964,257	482	

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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

$$\frac{3.7 \text{ lbs}}{\text{ton pulp}} \times \frac{714 \text{ tons}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = \frac{964{,}257 \text{ lbs TRS}}{\text{year}} = \frac{482 \text{ tons}}{\text{year}}$$

#1 and #2 Batch Digesters

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[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	7,615,178	3808	21 & 22

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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[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	1,225,634	613	18

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

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

a) EPA-450/2-78-003b

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

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)

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	N/A	N/A	N/A	N/A	1,671,737	836	19

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).
EPA 450/2-78-003b

$$\frac{727 \text{ tons pulp}}{\text{day}} \times \frac{6.3 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{365 \text{ days}}{\text{year}} \times \frac{1{,}671{,}737 \text{ lbs TRS}}{\text{year}} = \frac{836 \text{ tons}}{\text{year}}$$

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[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	20

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).
EPA 450/2-78-003b

$$\frac{727 \text{ tons pulp}}{\text{Day}} \times \frac{6.3 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{365 \text{ days}}{\text{year}} = \frac{1{,}671{,}737 \text{ lbs TRS}}{\text{year}} = 836 \frac{\text{tons}}{\text{year}}$$

#1 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		
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[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	14
Visible Emissions	N/A		10% opacity	N/A	N/A		14
TRS	N/A		N/A		(c) 913,668	457	14

[1] See Section V, Item 2.

[2] Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3] Calculated from operating rate and applicable standard.

[4] Emission, 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

#2 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		
Lime Mud	N/A	N/A	24,000	15

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[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	15
Visible Emissions	N/A		10% opacity	N/A	N/A		15
TRS	N/A		N/A		(c) 913,668	457	15

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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

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		
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	N/A		16
TRS	N/A		N/A	N/A	(c) 1,218,735	609	16

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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

$$\frac{4.2 \text{ lbs TRS}}{\text{ton pulp}} \times \frac{795 \text{ tons pulp}}{\text{day}} \times \frac{365 \text{ days}}{\text{year}} = \frac{1{,}218{,}735 \text{ lbs TRS}}{\text{year}} = \frac{609 \text{ tons}}{\text{year}}$$

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COPY

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.

NO

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

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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

Terry Cole

TC:slt

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

23 Oct. 87 Atlanta, GA

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 alundum 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 on 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 PM_{10} emissions may also need to be addressed). In addition, the net emissions change for other pollutants

(SO_2, NO_x, CO, etc.) will have to be determined. The emissions changes 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

Winston A. Smith, Director
Air, Pesticides and Toxics
Management Division

Copies: CHF/BT
Bruce Mitchell
Mike Harley
Betsy Pittman/Mark Zilberberg