Check Sheet

Company Name: Seminole Kraft Corporation
Permit Number: AC 16-183354
PSD Number:
Permit Engineer:

Application:

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  - ☐ Other Withdrawn

Cross References:
- ☐
- ☐
- ☐

Intent:

- ☐ Intent to Issue
- ☐ Notice of Intent to Issue
- ☐ Technical Evaluation
- ☒ BACT or LAER Determination
- ☐ Unsigned Permit

  Correspondence with:
  - ☐ EPA
  - ☐ Park Services
  - ☐ Other
- ☐ Proof of Publication
  - ☐ Petitions - (Related to extensions, hearings, etc.)
  - ☐ Waiver of Department Action
  - ☐ Other

Final Determination:

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

Post Permit Correspondence:

- ☐ Extensions/Amendments/Modifications
- ☐ Other

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. *(Extra charge)* 2. ☐ Restricted Delivery *(Extra charge)*

3. Article Addressed to:
Mr. L.A. Stanley, Gen. Mgr
Seminole Kraft Corp.
9469 Eastport Rd
Jacksonville, Fl 32218

4. Article Number
P 280 742 412

Type of Service:
☐ Registered ☐ Insured
☑ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X Paul G. Ennen

7. Date of Delivery 9-4-90

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

PS Form **3811**, Apr. 1989 ★U.S.G.P.O. 1989-238-815 **DOMESTIC RETURN RECEIPT**

P 280 742 412

RECEIPT FOR CERTIFIED MAIL

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

Sent to L.A. Stanley	
Street and No. Seminole Kraft Corp	
P.O., State and ZIP Code 9469 Eastport Rd. Jax, Fl	
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 8-30-90 AC 16-144791	

PS Form 3800, June 1985 ☆U.S.G.P.O. 1989-234-555

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

August 28, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Stanley:

Re: Amendment to Construction Permit No. AC 16-144791
No. 3 Lime Slaker

On August 15, 1990, a variance, OGC File No. 90-0701, was issued for the above referenced source. Based on the terms of the variance, the following will be changed and added:

Specific Condition No. 5:

FROM:

A scrubber system shall be installed to control pollutant emissions from the lime slaker. Particulate matter (PM) emissions shall not exceed 3.2 lb/hr and 7 TPY. Visible emissions shall be limited to no more than the average opacity level achieved during the initial compliance test, which establishes compliance with the standard, plus 5% opacity. Compliance tests for PM shall be demonstrated using EPA Methods 1, 2, 3, 5, and 9, in accordance with 40 CFR 60, Apprendix A, and FAC Rule 17-2.700. The test facilities for the lime slaker shall comply with all applicable provisions of FAC Rule 17-2.700(4)(c). Sampling ports shall be located pursuant to FAC Rule 17-2.700(4)(c)1.c.i. Compliance tests shall be demonstrated while operating at 90-100% of the maximum permitted rate. The Duval County Bio-Environmental Services Division (BESD) office shall be notified 15 days prior to testing.

TO:

a. **Up to and including August 15, 1992, particulate matter (PM) emissions shall not exceed 1.0 lbs/hr, 4.38 TPY. Annual compliance tests shall be conducted using EPA Reference Method 5 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.**

b. After August 15, 1992, PM emissions shall not exceed 0.03 gr/dscf (0.07 lbs/hr, 0.32 TPY). However, the owner or operator may exceed these emission limits if the pollution control device for PM has an actual PM collection efficiency of at least 98 percent. Annual compliance tests shall be conducted using EPA Reference Method 5 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

c. The initial actual PM collection efficiency shall be established by conducting inlet and outlet PM tests using EPA Reference Method 5 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A. The Department reserves the right to require testing to determine the actual efficiency of the PM control system for both annual compliance tests and operation permit renewal.

d. Visible emissions shall not exceed 5% opacity ($\leq$ 5% opacity). Annual compliance tests shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

e. Other test method(s) may be used only after prior Department approval has been granted pursuant to F.A.C Rule 17-2.700(3).

f. Compliance tests shall be conducted while operating at 90-100% of the maximum permitted processing rate.

g. The Duval County Bio-Environmental Services Division (BESD) shall be notified in writing 15 days prior to testing in accordance with F.A.C. Rule 17-2.700(2)(a)9. The test reports shall be filed with the BESD no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-2.700(7).

h. Stack sampling facilities shall be in accordance with F.A.C. Rule 17-2.700(4).

i. All references to the 40 CFR 60 shall mean the July, 1988 version.

Specific Condition No. 11: (New)

The Department shall be notified in writing every 6 months on the status of the conversion to 100% recycled fiber, and shall be notified in writing of the date of any source shut-down, along with the affected Departmental permit(s).

Expiration Date Extension:

Due to Condition No. 7 of the "Stipulation of Settlement" (OGC Case No. 89-0022), the following shall be changed:

From: December 1, 1988
To: **March 31, 1991**

Attachments to be Incorporated:

o "Grant of Variance" letter with attachment (Exhibits 1-23) to Mr. L. A. Stanley dated August 8, 1990, and signed August 15, 1990.

o "Stipulation of Settlement" (OGC File No. 89-0022), signed February 15, 1990.

This letter must be attached to your air construction permit, AC 16-144791, and shall become a part of the permit.

Sincerely,

for STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

SS/BM/plm

Attachment

c: B. Congdon, DER
A. Kutyna, NE Dist.
R. Roberson, BESD
T. Tomasello, OHF&C, P.A.

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

SEMINOLE KRAFT CORPORATION, Petitioner, vs. STATE OF FLORIDA, DEPARTMENT OF ENVIRONMENTAL REGULATION Respondent.	DOAH Case No. 89-5133 OGC Case No. 89-0022

STIPULATION OF SETTLEMENT

Petitioner, Seminole Kraft Corporation, and Respondent, the State of Florida Department of Environmental Regulation, by and through their undersigned attorneys, hereby stipulate and agree as follows:

1. On February 8, 1990, Petitioner's Attorney filed a Notice of Dismissal concerning Paragraph 4(c) of it's Petition for Formal Administrative Proceedings. Petitioner agrees not to raise the issues encompassed in Paragraph 4(c) again in this proceeding.

2. The Department's regulations require the use of EPA Method 5, 40 CFR 60, Appendix A (July 1, 1988 version) or an alternative procedure approved by the Department pursuant to Rule 17-2.700(3), F.A.C., to make the actual efficiency demonstration required by Rule 17-2.650(2)(c)12, F.A.C.

3. Petitioner shall file a petition for variance, pursuant to Rule 17-103.100, F.A.C., within ten days of the date of this Stipulation. The petition for variance shall request a variance from Rule 17-2.650(2)(c)12, F.A.C.

4. The final hearing presently set for February 23, 1990, should be rescheduled to a date during the middle of the month of August, 1990, to allow the Department to determine the merits of the petition for variance referred to in paragraph 3 above and the merits of a pending Request for Alternative Procedure.

5. If the Department grants the request for alternative procedure and that determination becomes final, the Department shall amend Construction Permit No. AC16-144791 and then issue Operating Permit No. AO16-155275, substantially in the form of the draft permit which is the subject of the instant proceeding. Provided, however, Specific Condition 5 of the construction permit and Specific Condition 10 of the operation permit shall be amended as follows:

10a. Absent a 98% collection efficiency demonstration for particulate matter using EPA Method 5, 40 CFR 60, Appendix A (July 1, 1988 version) or an alternative methodology approved pursuant to Rule 17-2.700(3), F.A.C., particulate matter shall not exceed 0.03 gr/dscf (0.07 lb/hr; 0.32 TPY). Compliance shall be demonstrated using EPA Method 5, 40 CFR 60, Appendix A (July 1, 1988 version) or an alternative methodology approved pursuant to Rule 17-2.700(3), F.A.C. Visible emissions shall not exceed 5% opacity (no visible emissions) and compliance shall be demonstrated using EPA Method 9, 40 CFR 60, Appendix A (July 1, 1988 version).

10b. The maximum allowable emissions, after demonstrating an actual particulate matter collection efficiency of 98%, by EPA Method 5, 40 CFR 60, Appendix A (July 1, 1988 version) or an alternative methodology approved pursuant to Rule 17-2.700(3), F.A.C., shall be as follows:

Pt. No.	Pollutant	lbs/hr	T/yr	Other	Opacity
21	PM	1.0	4.38		
	VE				≤ 5%

6. If the Department grants the request for a variance and that determination becomes final, the Department shall amend Construction Permit No. AC16-144791 and then issue Operating

Permit No. AO16-155275, substantially in the form of the draft permit which is the subject of this proceeding. However, Specific Condition 5 of the construction permit and Specific Condition 10 of the operating permit shall be amended to read as follows:

Pt. No.	Pollutant	lbs/hr	T/yr	Other	Opacity
21	PM	1.0	4.38		
	VE				≤ 5%

7. Petitioner may continue to operate under construction permit AC16-144791 until the operating permit becomes final and the Department agrees not to bring any enforcement action against the Petitioner provided that the Petitioner complies with the emission limitations set forth in the construction permit.

8. In the event that the requested variance or requested alternative procedure is not granted and Petitioner files a Petition for Administrative Proceeding thereon, any such petitions should be consolidated with the instant case and heard at the final hearing to be set in August.

9. In the event that either the Variance or the Request for Alternative Procedure is granted by the Department, Petitioner shall dismiss the petition pending in this case and any pending petitions on the variance or the Request for Alternative Procedure.

DATED this 15th day of February, 1990.

Thomas G. Tomasello

THOMAS G. TOMASELLO, Esquire

OERTEL, HOFFMAN,
FERNANDEZ & COLE, P.A.
ATTORNEYS AT LAW
Post Office Box 6507
Tallahassee, Florida 32314-6507

W. H. Congdon

WILLIAM H. CONGDON
Assistant General Counsel

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

*****

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to Mr. Terry Cole, Esquire, Oertel, Hoffman, Fernandez & Cole, P.A., Attorneys at Law, Post Office Box 6507, Tallahassee, Florida 32314-6507 by Hand Delivery, this 15th day of February, 1990.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

W. H. Congdon

WILLIAM H. CONGDON
Assistant General Counsel

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

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

August 8, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Stanley:

Re: Grant of Variance
OGC File No. 90-0701
No. 3 Lime Slaker

The Department has reviewed and processed the variance request for the above referenced source. The Department is in agreement with the request and the variance is hereby granted, subject to the following conditions:

1) The appropriate conditions of the construction permit (AC 16-144791) and the operating permit (AO 16-155275) shall be amended to reflect:

   a. The No. 3 lime slaker's maximum allowable PM emissions shall not exceed 1.0 lbs/hr, 4.38 TPY. Annual compliance tests shall be conducted using EPA Reference Method 5 in accordance with 40 CFR 60, Appendix A, and Rule 17-2.700, Table 1, F.A.C.

   b. The No. 3 lime slaker's maximum visible emissions shall not exceed 5% opacity ($\leq$ 5% opacity). Annual compliance tests shall be conducted using EPA Reference Method 9 in accordance with 40 CFR 60, Appendix A, and Rule 17-2.700, Table 1, F.A.C.

2) This variance shall be issued for a 24 month time period calculated from the date this variance is executed.

3) The Department shall be notified every 6 months on the status of the conversion to 100% recycled fiber, and shall be notified in writing of the date of any source shut-down, along with the affected Departmental permit(s).

4) Exhibits 1-23, attached, are incorporated by reference in this Variance.

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

Executed in Tallahassee, Florida.

Issued this 15th day of August, 1990

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

DT/kt

Attachment

Copies furnished to:

S. Smallwood, DER
C. Fancy, DER
B. Congdon, Esq., DER
C. Shaver, NPS
A. Kutyna, DER
R. Roberson, BESD
B. Miller, EPA

Attachment

EXHIBITS

1. Cost of upgrading the existing system dated December 4, 1989.
2. Stipulation of Settlement dated February 15, 1990.
3. Application for Variance received February 22, 1990.
4. Mr. C. H. Fancy's letters dated March 7, 1990.
5. Mr. Robert S. Pace's letter dated March 16, 1990 and received March 19, 1990.
6. Department's request to publish the Notice of Intent in the May 25, 1990, issue of the Florida Administrative Weekly (F.A.W.).
7. Distribution cover letters associated with the Intent to Issue variance package.
8. May 25, 1990, F.A.W. notice issue.
9. Mr. T. G. Tomasello's letter dated May 30, 1990, and received May 31, 1990.
10. The Public Notice of the Intent to Issue in the May 23, 1990 issue of the Florida Times-Union received June 4, 1990.
11. Mr. R. L. Maguire's letter dated June 8 and received June 11, 1990.
12. Mr. T. Cole's letter dated June 8 and received June 11, 1990.
13. Mr. L. A. Stanley's letter dated June 14, 1990, and received June 18, 1990.
14. Mr. B. P. Miller's letter received via FAX on June 19, 1990.
15. Mr. T. Roger's memo with an associated model print-out dated June 22, 1990.
16. The Department's Intent to Grant Variance package that was placed on public notice and subjected to a public hearing.
17. Mr. Terry Cole's letter dated and received May 21, 1990.
18. June 26, 1990 Public Hearing Agenda.
19. June 26, 1990 Public Hearing Attendee List.
20. Mr. Robert S. Pace's letter dated March 16, 1990, and received June 26, 1990.
21. Mr. John Brown's Interoffice Memorandum dated September 8, 1989, and submitted by Mr. Pace on June 26, 1990.
22. Mr. Ferrari's letter dated June 25, 1990, and submitted by Mr. Pace on June 26, 1990.
23. BESD stack test review for SKC's No. 3 lime slaker submitted by Mr. Pace on June 26, 1990.
24. Final Determination dated August 8, 1990.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Steve Smallwood

FROM: Clair Fancy I signed SSm on Tennessee week.

DATE: August 28, 1990

SUBJ: Amendment to Construction Permit No. AC 16-144791
Seminole Kraft Corporation
No. 3 Lime Slaker

Attached for your approval and signature is an amendment prepared by Bruce Mitchell in accordance with the requirements of the variance, OGC File No. 90-0701, which was signed August 15, 1990, and the "Stipulation of Settlement," OGC File No. 89-0022, which was signed February 15, 1990.

The Bureau recommends approval of this amendment.

CF/BM/plm

Attachment

AC16-183354
#200.00
R.# 151142

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED
JUL 12 1990
DER-BAQM

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Lime Slaker [X] New[1] [ ] Existing[1]

APPLICATION TYPE: [ ] Construction [ ] Operation [XX] 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.3 Lime Slaker

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: L.A. Stanley, 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

I certify that the statements made in this application for a modification permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: L.A. Stanley

L.A. Stanley - General Manager
Name and Title (Please Type)

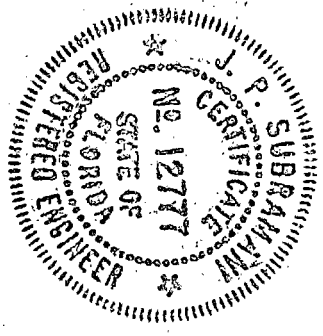
Date: 7/10/90 Telephone No. 904-751-6400

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 discha 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 J P Subramani

J.P. Subramani, P.E.
Name (Please Type)

Oertel, Hoffman, Fernandez & Cole, P.A.
Company Name (Please Type)

P.O. Box 6507, Tallahassee, Fl. 32314-6507
Mailing Address (Please Type)

Florida Registration No. 12777 Date: 7/11/90 Telephone No. (904) 877-0099

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.

A new slaker has been installed (See Attachment A for scrubber description). The modification request is to increase the throughput from 384 to 396 tons/day (from 16.0 to 16.5 TPH max)

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

Start of Construction _____ Completion of Construction _____

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Scrubber - $25,000

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

AC16 - 144791 Issue date: April 20, 1988
Expiration date: December 1, 1988

E. Requeated 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? No

   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. No

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. No

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? No

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? No

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? No

   a. If yes, for what pollutants?_____

   b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

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

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Lime	NA	NA	33,000 (dry)	17
Green Liquor	NA	NA	725,000 at 15% solids	17

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

1. Total Process Input Rate (lbs/hr): 758,000 lbs/hour

2. Product Weight (lbs/hr): White Liquor - 595,000 #/hr at 10% solids
Lime Mud - 165,000 #/hr at 29% 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	
TSP	1.0	4.38	20.4 lbs/hr (Process wt. table)	1.0 #/hr	289,080	144.5	17

[1]See Section V, Item 2. See Attachment F for Calculations

[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).

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)
GOSLIN BIRMINGHAM #36 POSIDRAFT SLAKE SCRUBBER	TSP	99.5	NA	BEST ENGINEERIN JUDGEMENT

E. Fuels

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.

Annual Average _____ Maximum _____

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

SLAKER GRITS - WILL BE DISPOSED OF IN ONSITE LANDFILL AS THE GRITS FROM THE CURRENT SLAKER

SCRUBBER WATER - WILL DRAIN INTO MILL PROCESS SEWER AND BE TREATED IN OUR WASTEWATER TREATMENT PLANT

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

Stack Height: 75 ft. Stack Diameter: 1 ft.

Gas Flow Rate: 540 ACFM 370 DSCFM Gas Exit Temperature: 142 °F.

Water Vapor Content: 22% % Velocity: 11.5 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: _____

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
TOTAL PROCESS INPUT RATE AND PRODUCT WEIGHT WERE DERIVED FROM MATERIAL BALANCE.
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 ATTACHMENT F
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
SEE ATTACHMENT F
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
SEE ATTACHMENT A
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
SEE ATTACHMENT B
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
SEE ATTACHMENTS D & E
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.
SEE ATTACHMENT C

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

NOT APPLICABLE SEE ATTACHMENT G

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

[ ] Yes [X] No

Contaminant	Rate or Concentration

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

[ ] Yes [X] 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

A. Company Monitored Data NA, SEE ATTACHMENT G

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.

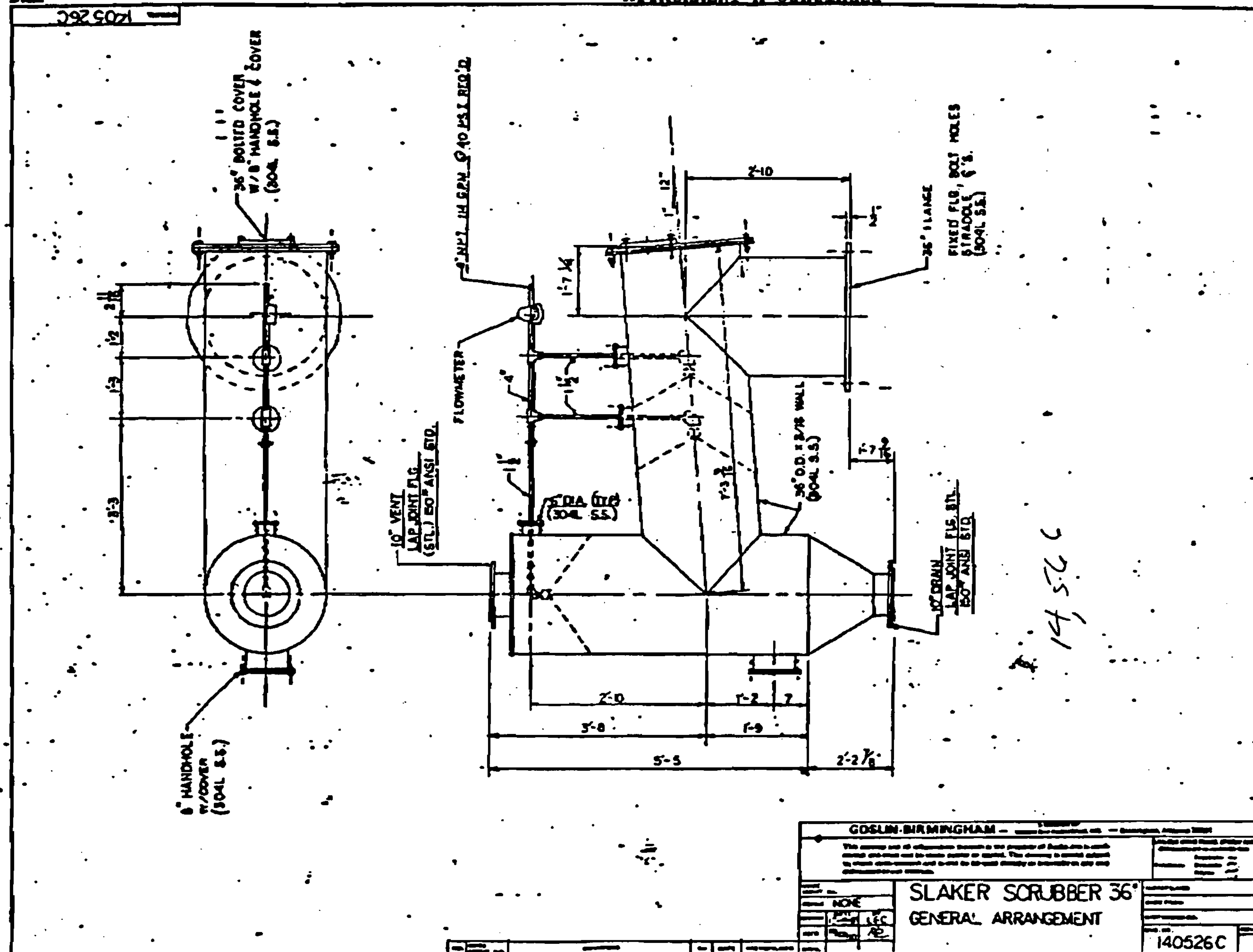
H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT A

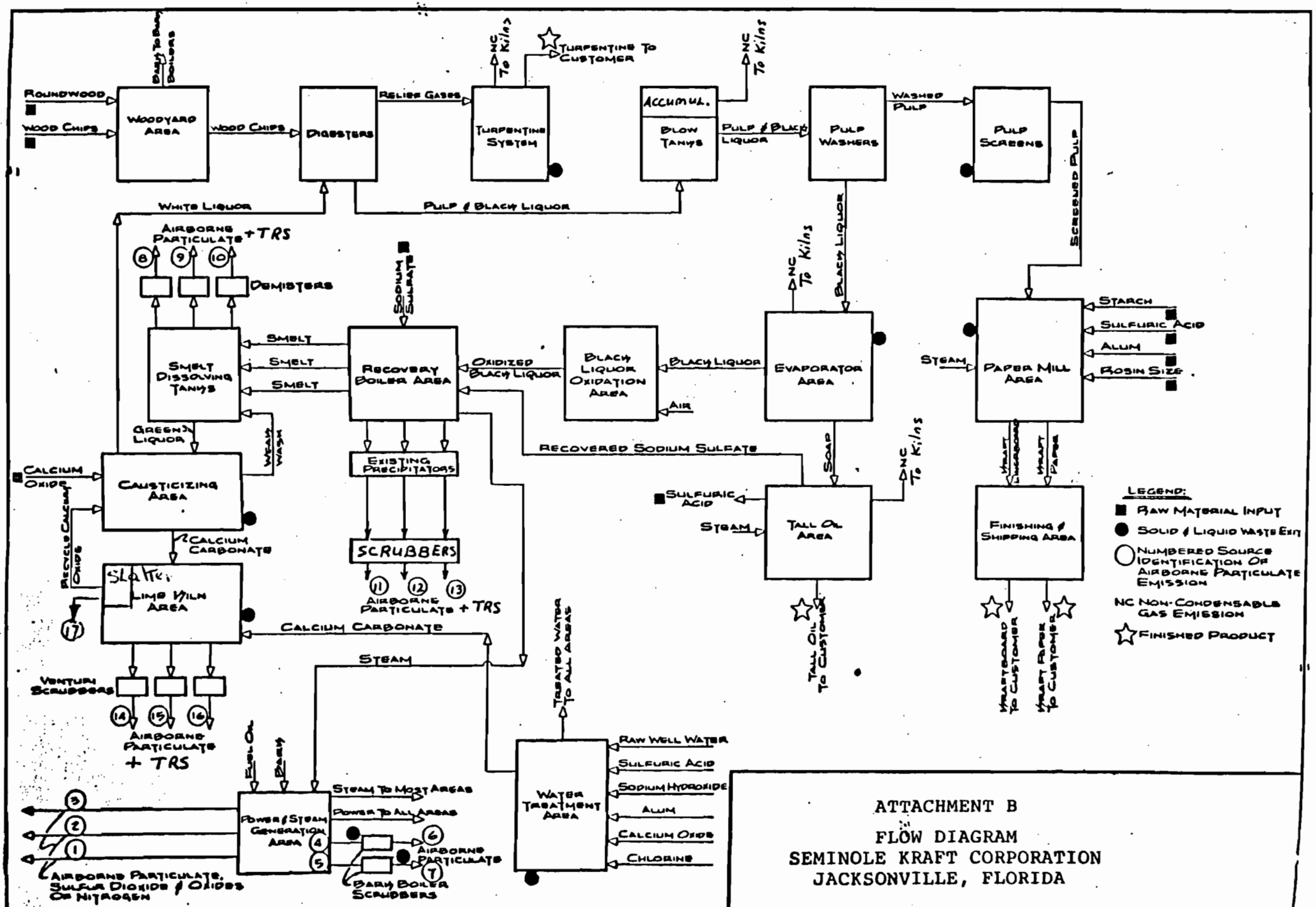
Slaker Scrubber

Description

The particulate emissions from the new slaker are controlled by a Goslin 36" positive draft 304L stainless steel scrubber with a 35" flange for connection to slaking compartment vent, a 10" drain to sewer and a 10" vent to the stack. A 1" NPT manifold will carry water to the spray nozzles. Scrubber water is estimated to be 50-120 gpm as required. As noted on Attachment F, scrubber efficiency is estimated to exceed 99% efficiency. See attached drawing for scrubber details.


36" BOLTED COVER W/8" HANDHOLE & COVER (304L S.S.)
2" NPT 14 GPM @ 10 PSI REQ'D
FLOWMETER
10" VENT LAP JOINT FLG. (STL.) 150# ANSI STD.
6" HANDHOLE W/COVER (304L S.S.)
36" O.D. x 3/16 WALL (304L S.S.)
36" FLANGE
FIXED FLG. BOLT HOLES STRADDLE ℄'S. (304L S.S.)
10" DRAIN LAP JOINT FLG. STL. 150# ANSI STD.
2'-10
2'-0
1'-2
7
3'-8
1'-9
5'-5
2'-2 7/8
GOSLIN-BIRMINGHAM
NONE
LEC
SLAKER SCRUBBER 36"
GENERAL ARRANGEMENT
140526C

D-0.5 F- ER- SP



ATTACHMENT B

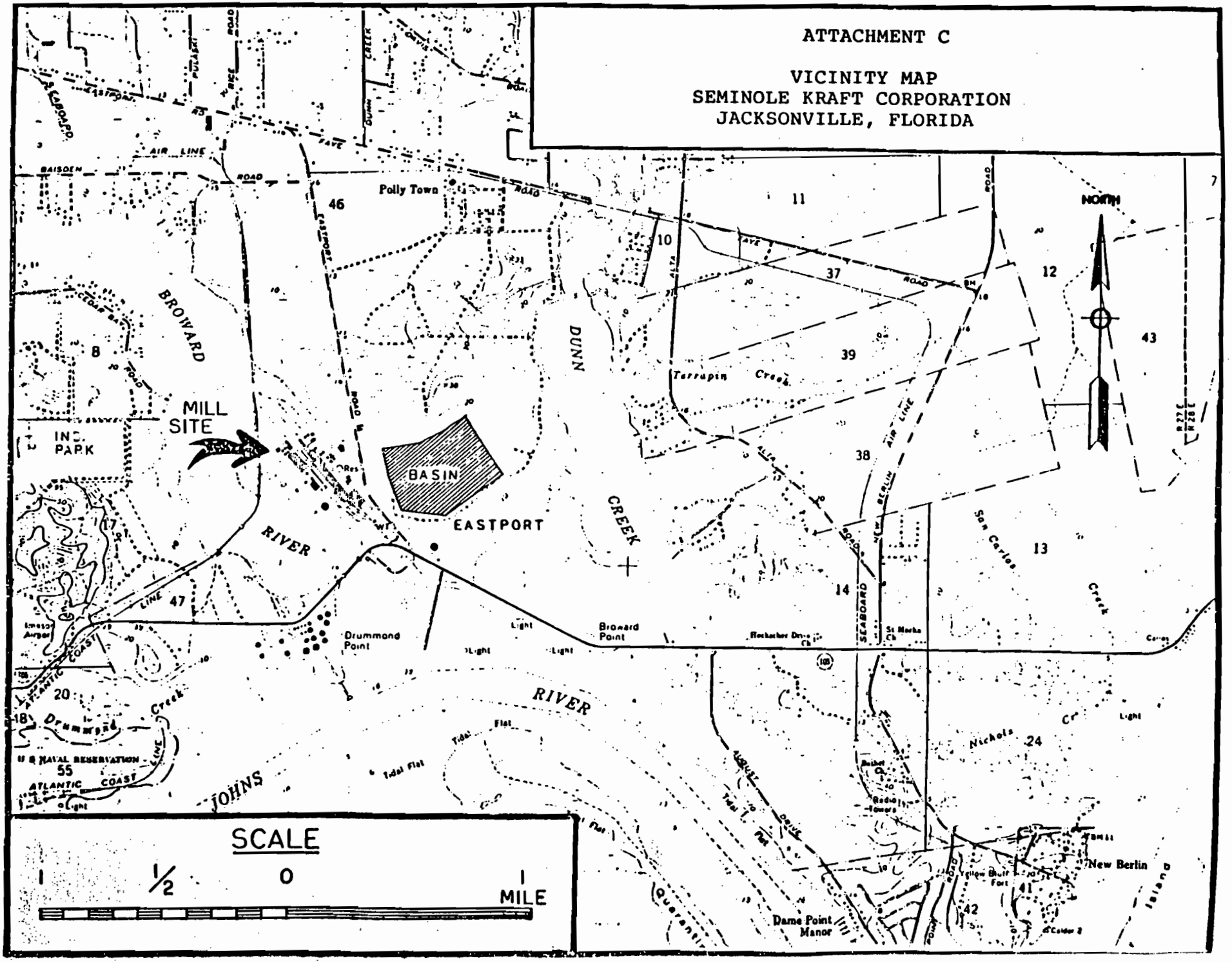
FLOW DIAGRAM

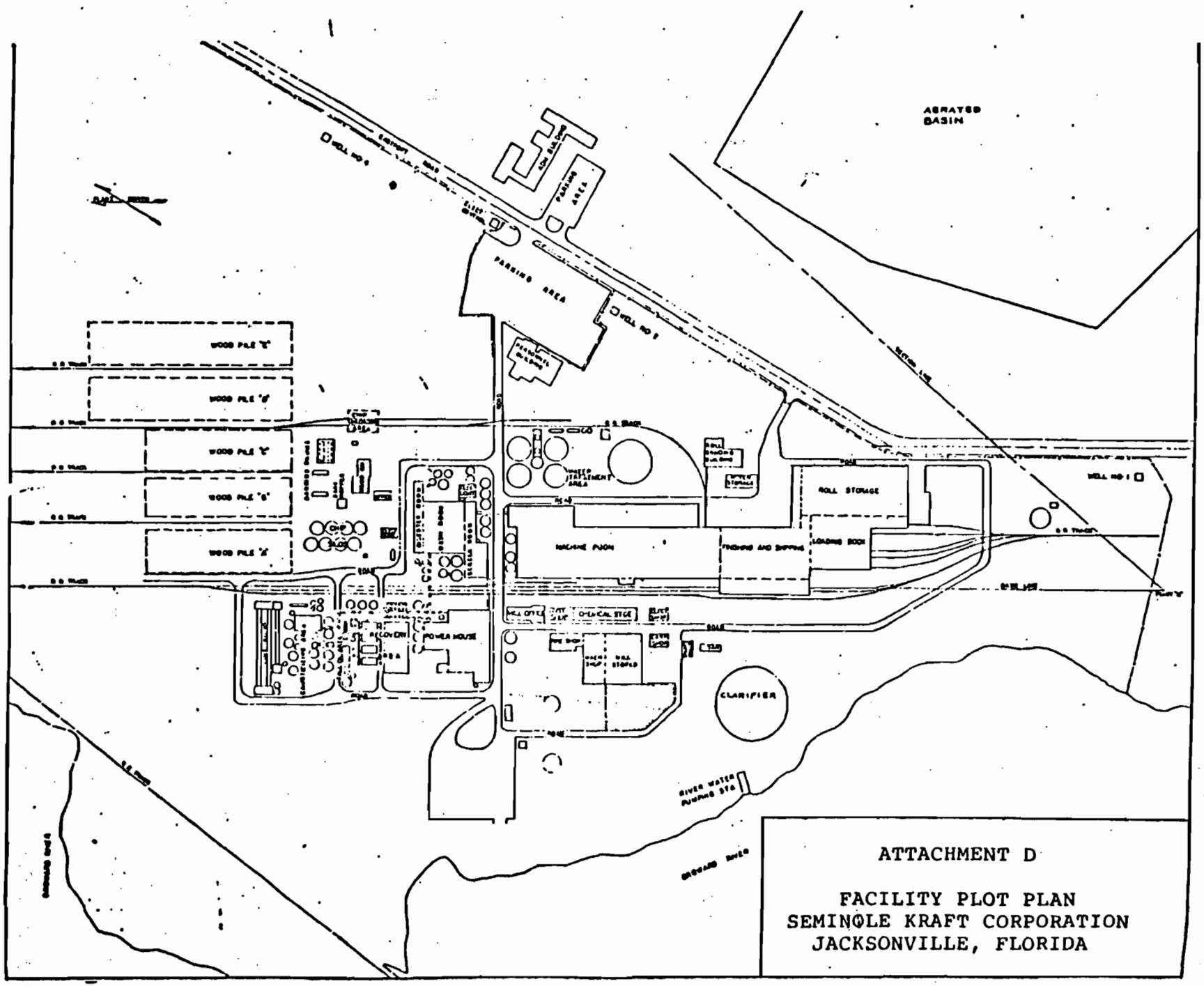
SEMINOLE KRAFT CORPORATION

JACKSONVILLE, FLORIDA

ATTACHMENT C

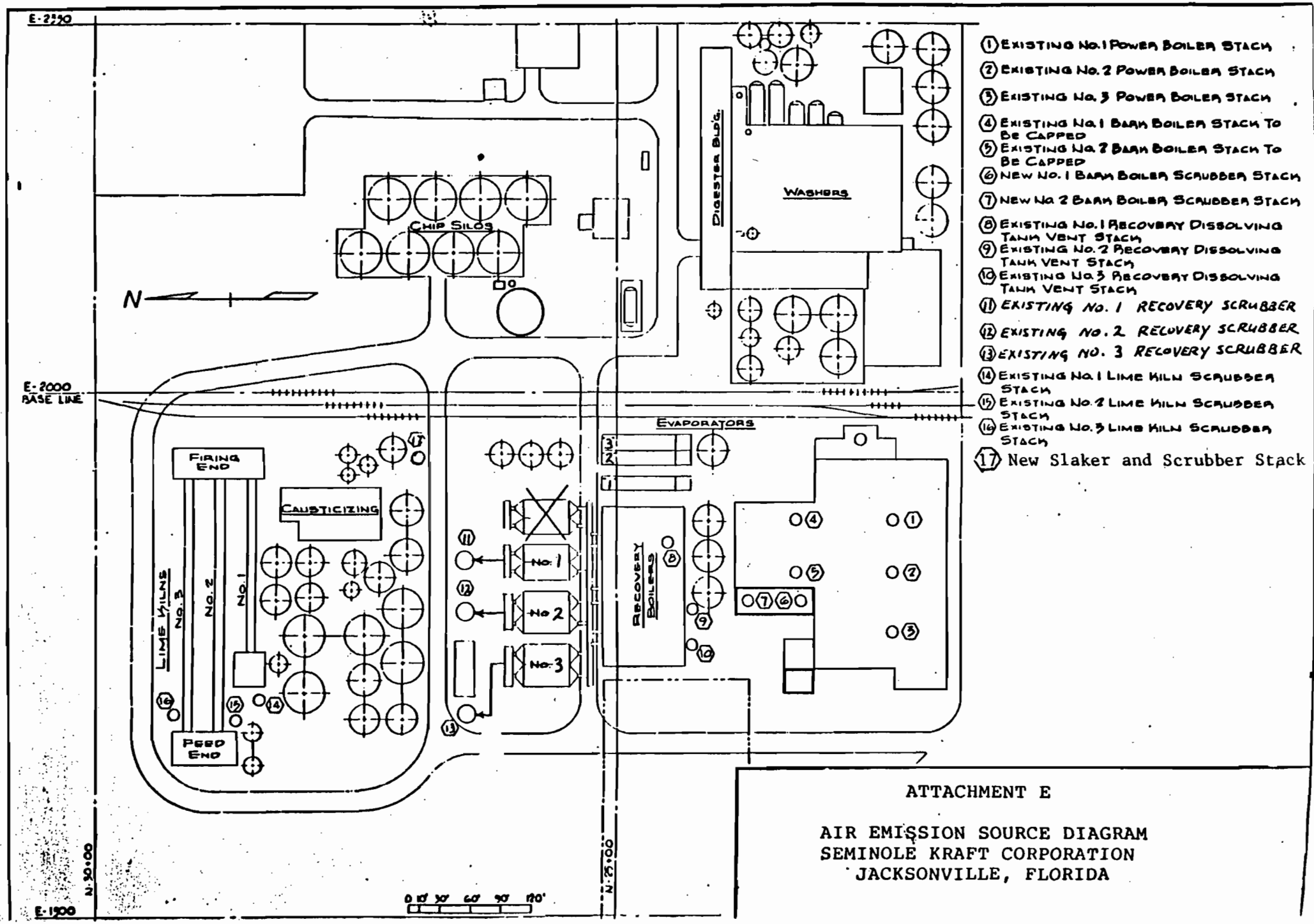
VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





ATTACHMENT D

FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

ATTACHMENT F

Lime Slaker Emissions

I. Estimated Particulate Emissions from old #1 & #2 Lime Slaker.

The old lime slakers were uncontrolled. Assuming 1% of input lime becomes dust, uncontrolled emissions would be:

$$\frac{.01 \times 384 \text{ Tons}}{\text{day}} \times \frac{1 \text{ day}}{24 \text{ hrs}} \times \frac{2000 \text{ lbs}}{\text{ton}} = 320 \text{ lbs/hr}$$

Alternatively, AP-42 indicates controlled emissions from similar sources which use a simple water spray for control are:

$$\frac{0.1 \text{ lbs}}{\text{ton}} \times \frac{384 \text{ tons}}{\text{day}} \times \frac{1 \text{ day}}{24 \text{ hrs}} = 1.6 \text{ lbs/hr}$$

Assuming a water spray was 95% efficient, the uncontrolled emissions from the old Slaker which had no water spray would be:

$$\frac{1.6 \text{ lbs/hr}}{.05} = 32 \text{ lbs/hr} = 32 \text{ lbs/hr}$$

Best Engineering judgment indicates the particulate emission from the old lime slakers was 32 lbs/hr or 140 tons/year.

For 396 tons production on a daily basis, the uncontrolled particulate emission would be 33 lbs/hr or 144.5 tons/year.

II. Actual Particulate Emissions from New Lime Slaker:
(Stack tests on 8/16/89; See 9/20/89 letter to Clair Fancy from J. P. Subramani):

Run #1	-	0.34 lbs/hr
Run #2	-	0.28 lbs/hr
Run #3	-	0.33 lbs/hr
Average	-	0.31 lbs/hr

III. Potential Allowable Particulate Emissions from New Lime Slaker based on Process Weight Table (Processing 396 tons/day):

Process Weight = 16.5 tons/hour

Using Process Weight Table (Rule 17-2.610, F.A.C.), allowable particulate emissions are 20.4 lbs/hr or 89.4 tons/year.

However, the company is requesting a more restrictive limit of 1.0 lbs/hour or 4.38 tons/year.

Note: Screening modeling (ISC - ST performed by Mr. Tom Rogers of the Division of Air Resources Management) indicates that this source has an insignificant ambient impact.

ATTACHMENT G

PSD and BACT APPLICABILITY

I. General

This construction permit modification request is to increase particulate emission for the new slaker from an actual of 0.31 lbs/hr for a potential permitted limit of 1.0 lb/hr. This is an increase of 0.69 lbs/hr or 3 tons/year in particulate emissions which will result from this construction permit modification. It should be noted that the sources this new slaker replaced (#1 & 2 slakers) emitted 32 lbs/hr or 140 tons/year. So installation of this slaker has already resulted in a substantial decrease in particulate emissions (see Attachment F for details). Also, the ISCST screening model evaluated the difference between 0.07 lbs/hr (0.03 gr/dscf) and 1.0 lb/hr and assumes that all of the emissions are PM_{10}.

II. PSD Applicability

A PSD new source review is not applicable to the modification of this construction permit because the net increase in particulate emissions (3.0 tons/year) is less than the 25 tons/year deminimus level for particulate and 15 tons/year for PM_{10}. Assuming PM_{10} is 95% of total suspended particulate, the increase in PM_{10} is less than 3.0 tons/year which is also less than the 15 tons/year deminimus level for PM_{10}. Therefore, a PSD new source review is not required.