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. T. Frank Lee, Gen. Mgr.
Seminole Kraft Corp.
P.O. Box 26998
Jacksonville, FL 32218

4. Article Number

P 274 010 500

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

Always obtain signature of addressee or agent and DATE DELIVERED.

8. Addressee's address *ONLY if requested and fee paid*

5. Signature — Addressee

X

6. Signature — Agent

X Allan Jones

7. Date of Delivery

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

P 274 010 500

RECEIPT FOR CERTIFIED MAIL

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

Sent to Frank Lee, Gen. Mgr. ~~Seminole Kraft Corp.~~	
Street and No. P.O. Box 26998	
P.O., State and ZIP Code Jacksonville, FL 32218	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date Mailed: 04/22/88 Permit: AC 16-144791	

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, General Manager
Seminole Kraft Corporation
P.O. Box 26998
Jacksonville, Florida 32218

April 22, 1988

Enclosed is permit No. AC 16-144791, for Seminole Kraft Corporation to install/construct a lime slaker with a scrubber at Seminole Kraft Corporation's facility located 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:

John T. Mckinnon, P.E.
Jerry Woosley, BESD

Final Determination

Seminole Kraft Corporation
Duval County

Lime Slaker with Scrubber
Permit No. AC 16-144791
APIS No. 31DVL16006721

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

April 20, 1988

Final Determination

Seminole Kraft Corporation's application for a permit to construct/install a Lime Slaker with a scrubber at their facility in Jacksonville, Duval County, Florida, has been reviewed by the Bureau of Air Quality Management.

Public Notice of the Department's Intent to Issue the construction permit was published in The Jacksonville Journal on April 4, 1988.

Copies of the Preliminary Determination have been available for public inspection at the Department's Northeast District office in Jacksonville, the Duval County's Bio-Environmental Services Division (BESD) in Jacksonville, and the Department's Bureau of Air Quality Management in Tallahassee.

Comments were received from Mr. Curt Barton and Mr. John Millican. Their comments were in regard to Specific Condition No. 5.

The Bureau has considered the comments and agrees to change the above mentioned condition as requested, since a higher opacity is allowed by FAC Rule 17-2.650(2)(c)(12)(b). Therefore, Specific Condition No. 5 will be changed as follows:

From:

5. 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 5% opacity, 6 minute average. Compliance tests for PM shall be demonstrated using EPA Methods 1, 2, 3, 5, and 9, in accordance with 40 CFR 60, Appendix 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:

5. 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, Appendix 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.

The final action of the Department is to issue the permit with the changes as described in this 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 32210

Permit Number: AC 16-144791
Expiration Date: December 1, 1988
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: Lime Slaker with a Scrubber

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 construction of a lime slaker with a scrubber. This unit will be located at the Seminole Kraft Corporation facility in Jacksonville, Duval County, Florida. The UTM coordinates of this site are Zone 17, 441.75 East and 3365.60 North.

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

Attachments

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16) dated February 2, 1988.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-144791
Expiration Date: December 1, 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. This source shall be allowed to operate continuously (8760 hours/year).

SPECIFIC CONDITIONS:

2. In accordance with FAC Rule 17-2.610(3), Unconfined Emissions of PM, reasonable precautions to control emissions of unconfined PM may include, but shall not be limited to the following:

a) Reduced speeds for vehicular traffic.

b) Use of liquid resinous adhesives or other liquid dust suppressants or wetting agents.

c) Use of paving or other asphaltic materials.

d) Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or otherwise by wetting prior to sweeping.

e) Covering of trucks, trailers, front end loaders, and other vehicles or containers to prevent spillage of particulate matter during transport.

f) Use of mulch, hydroseeding, grassing and/or other vegetative ground cover on barren areas to prevent or reduce windblown particulate matter.

g) Use of hoods, fans, filters, and similar equipment to contain, capture, and vent particulate matter.

h) Enclosure or covering of conveyor systems.

3. In accordance with FAC Rule 17-2.620(2), no person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

4. In accordance with FAC Rule 17-2.240, Circumvention, no person shall circumvent any air pollution control device or allow the emissions or air pollutants without the applicable pollution control device operating properly.

SPECIFIC CONDITIONS:

5. 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, Appendix 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.

6. Visible emissions and particulate emissions tests shall run concurrently.

7. A pressure meter shall be installed on the scrubber system for the lime slaker to measure the scrubbing liquid supply pressure. The pressure sensor or tap shall be located close to the scrubber liquid discharge point. The monitoring device is to be certified by the manufacturer to be accurate within $\pm$ 15 percent of design scrubbing liquid supply pressure.

8. The lime slaker is subject to the provisions of FAC Rule 17-2.250, Excess Emissions.

9. The construction shall reasonably conform to the plans and schedule submitted in the application. If the applicant is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit (FAC Rule 17-4.09).

To obtain a permit to operate, the applicant must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Duval County Department of Health, Welfare & Bio-Environmental Services (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. Operation beyond the construction permit expiration date requires a valid permit to operate (FAC Rules 17-4.22 and 17-4.23).

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-144791
Expiration Date: December 1, 1988

SPECIFIC CONDITIONS:

If the construction permit expires prior to the applicant requesting an extension or filing an application for a permit to operate, then all activities at the project must cease and the applicant must apply for a new permit to construct which can take up to 90 days to process a complete application (FAC Rule 17-4.10).

10. Upon obtaining a permit to operate, the permittee will be required to submit annual reports on the actual operation and emissions of this source. Annual reports shall be sent to Duval County Bio-Environmental Services Division (BESD).

Issued this 20 day of April, 1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann

Dale Twachtmann, Secretary

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Dale Twachtmann

FROM: Howard L. Rhodes

SUBJ: Approval of Seminole Kraft Corporation

State Construction Permit Number: AC 16-144791

DATE: April 20, 1988

Attached for your approval and signature is a permit prepared by Central Air Permitting for the above mentioned company to construct/install a Lime Slaker with scrubber. The facility is located in Jacksonville, Duval County, Florida. Noncontroversial comments were received from the Company's representatives during the public notice period.

Day 90, after which this permit will be issued by default, is May 21, 1988.

I recommend your approval and signature.

HLR/aqm/th

attachments

877-0099
Terry Cole

4-20-88
22:22
Maggie!
[illegible]
from [illegible]
[illegible]
P.S. the original almost went out the door, CHF intercepted

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

4/20

TO: Dale Twachtmann

FROM: Howard L. Rhodes /S/

RECEIVED
APR 21 1988
DER-BAQM

SUBJ: Approval of Seminole Kraft Corporation
State Construction Permit Number: AC 16-144791

DATE: April 20, 1988

Attached for your approval and signature is a permit prepared by Central Air Permitting for the above mentioned company to construct/install a Lime Slaker with scrubber. The facility is located in Jacksonville, Duval County, Florida. Noncontroversial comments were received from the Company's representatives during the public notice period.

Day 90, after which this permit will be issued by default, is May 21, 1988.

I recommend your approval and signature.

HLR/aqm/th

attachments

Claire - 4/20
John Millican took this to the Sec. Offic today - Q

RECEIVED
APR 21 1988
DER-BAQM

Check Sheet

Company Name: Seminole Kraft Corporation
Permit Number: AC 16-144791
PSD Number:
Permit Engineer:

Application:

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

Cross References:
- ☑ A016-155275
- ☐
- ☐

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

In the folder labeled as follows there are documents, listed below, which were not reproduced in this electronic file. That folder can be found in one of the file drawers labeled Supplementary Documents Drawer. Folders in that drawer are arranged alphabetically, then by permit number.

Folder Name: Seminole Kraft

Permit(s) Numbered:

AC	16	-	144791

Period during which document was received:		Detailed Description
APPLICATION 1988	1.	24"×36" BLUEPRINT: SLAKER SCRUBBER MODIFICATIONS (DRAWING NUMBER: DSK202-001) (REVISION P)

Department of Environmental Regulation

Routing and Transmittal Slip

To: (Name, Office, Location) Pat ? 3-16-90

1. Bryce, Jim ?
2.
3.
4.

Remarks:

Notice requirement on 14 days to appeal the operating permit issued by BESD on #3 Lime Slaker.

Enthalpy on Slaker exhaust. Should have steam instead of water

why did they use only 75 ml of a 500 ml sample.
no lab signed off on tear weights.

Pace thinks whole thing is very inconsistent.
no data showing $35,000 is economic hardship. You will be getting memo on MM 15.

From Alan

Date 3/16

Phone

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

FEB 23 1990

4APT-AC

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

Dear Mr. Fancy:

As requested in your letter of January 3, 1990, we have reviewed: the alternative test procedure requested by Seminole Kraft to determine the particulate removal efficiency of the scrubber on their No. 3 lime slaker; and the request from Whitaker Oil for a waiver of the provisions of NSPS Subpart XX which prohibit the loading of gasoline into tank trucks that have not been documented to be vapor tight. The following comments on both requests are provided for your consideration.

Alternative Test Procedure by Seminole Kraft

In principle, the alternative test procedure is sound, however, a more detailed test procedure should be requested. For example, the method to determine the scrubber water inlet flowrate should be described and the number of Method 5 tests per 8-hour scrubber test should be specified. After the alternative test procedure has been written to your satisfaction, we recommend that the procedure be approved.

In addition, we recommend that your agency investigate the possibility that this source, primarily the scrubber, is not being properly operated and maintained. The basis for this possibility is that the particulate emission rate for this source in July 1988, was approximately one-third of the rate determined on October 16, 1989, (0.034 versus 0.099 gr/dscf). Scrubbers on slakers are prone to scaling and if scale is not removed periodically, then poor scrubber performance and increased particulate emissions can occur.

Request by Whitaker Oil for NSPS Waiver

The request by Whitaker Oil to waive the Subpart XX provisions which prohibit the loading of gasoline into tank trucks that

have not been documented to be vapor tight [§ 60.502(e)] cannot be approved. Although this may place Whitaker Oil in an unfavorable economic position, we cannot approve the waiver of an NSPS requirement which is related to a reduction in air pollution. By eliminating leaking tank trucks, VOC emissions are reduced. Please note that Department of Transportation tank truck leak test procedures are not an acceptable alternative to the test procedure referenced in Subpart XX.

If you have any questions regarding this letter, please contact Mr. Paul Reinermann at 404/347-2904.

Sincerely yours,

Roger O. Pfaff, Chief
Air Compliance Branch
Air, Pesticides and Toxics
Management Division

cc: J. Pennington
CHF/BT

Jim

AC46-144791

Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

January 4, 1990

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

Subject: **Progress Report on OCC Conversion as Required for Construction Permits AC16-168607 and AC16-144791.**

Dear Mr. Fancy:

This letter is to comply with Specific Condition 15(c) of Construction Permit AC16-168607 and Specific Condition 11 of Construction Permit AC16-144791 that Seminole Kraft provide the Department with semi-annual progress reports to DER and BESD regarding our progress toward converting the mill to 100% recycle fiber.

As indicated earlier, Seminole has decided to convert the mill to 100% recycle fiber operation. We have ordered all long delivery equipment including:

1- New paper machine rolls
2- Repulpers for OCC
3- Cleaners for OCC
4- Flotation and dispersions systems for OCC
5- New paper machine winder
6- New pumps and motors

Engineering is progressing well and we expect to begin construction by March 1, 1991 as scheduled. We still anticipate startup in the summer of 1992.

Please let us know if you have any questions.

Sincerely,

Michael L. Riddle
Manager, Technical Services

/pt

cc: James Manning - BESD
Ernest Fry - FDER - Northeast District

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				$\leq$ 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.

Th 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

cc: Steve Pace - BESD
Ron Roberson - BESD
Andy Kutyna
CHF/JP/BT

2-19-90 RPR

2-19-90

CHF

~~FP~~

~~BT~~

FYI: SKC's # 345

issue final stipulation of settlement. Return to me for filing after readily and initially. Thanks,

Bruce

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

ATTORNEYS AT LAW

M. CHRISTOPHER BRYANT
R. L. CALEEN, JR.
C. ANTHONY CLEVELAND
TERRY COLE
MARTHA J. EDENFIELD
SEGUNDO J. FERNANDEZ
KENNETH F. HOFFMAN
KENNETH G. OERTEL
HAROLD F. X. PURNELL
PATRICIA A. RENOVITCH
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JOHN A. MILLICAN
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

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

February 14, 1990

RECEIVED
FEB 14 1990
Dept. of Environmental Reg.
Office of General Counsel

HAND-DELIVERY

Mr. William H. Congdon
Assistant General Counsel
Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Seminole Kraft Corporation v. DER, DOAH Case No.: 89-5133

Dear Mr. Congdon:

I would like to take the depositions of Mr. Mitchell, Mr. Pancy and Ms. Heron on Friday, February 16, 1990 at 10:00 a.m., 1:00 p.m. and 3:00 p.m.. You agreed that the depositions may take place under the subpoenas issued last week and that new subpoenas would not have to be issued.

Thank you for your assistance.

I look forward to your response.

Sincerely,

Thomas G. Tomasello

TGT/dg/1003

xc: Mr. Curt Barton
Mr. Mike Riddle

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

February 14, 1990

HAND DELIVERY

Mr. Terry Cole, Esquire
Mr. Tom Tomasselo, Esquire
Oertel, Hoffman, Fernandez & Cole, P.A.
Attorneys at Law
Post Office Box 6507
Tallahassee, Florida 32314-6507

Re: Seminole Kraft Corporation vs. DER;
OGC Case Number 89-0022
Operating Permit Number AO16-155275
for Number 3 Lime Slaker

Dear Terry and Tom:

Enclosed please find the Department's response to the changes you made to my draft Stipulation of Settlement. Other than my editing changes and paragraph 3, your version is acceptable to myself and Bruce Mitchell. Clair will have to sign off on your proposed emission limits tommorrow.

Your suggested paragraph 3, the Variance paragraph, is too narrowly drawn. Your client will need a variance from the 0.03 gr/dscf emission limit, not from the requirement for efficiency testing. Relief from the efficiency testing requirement is requested in your alternative procedure request.

I look foreward to our meeting tommorrow at 10:00 a.m.

Very truly yours,

Bill

William H. Congdon
Assistant General Counsel

WHC/il

cc: Clair Fancy

SECOND DRAFT

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 _____ day of February, 1990.

THOMAS G. TOMASELLO, Esquire

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

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 _____ day of February, 1990.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

WILLIAM H. CONGDON
Assistant General Counsel

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

Clair - FYI

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

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

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

February 8, 1990

HAND-DELIVERY

Mr. William H. Congdon
Assistant General Counsel
Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Seminole Kraft Corporation v. State of Florida Department of Environmental Regulation, DOAH Case No. 89-5133

Dear Mr. Congdon:

I still believe that the above-captioned matter can be resolved without going to hearing. With that in mind, I renew my request to meet with you, Mr. Smallwood and Mr. Thompson to discuss resolution of the upcoming hearing and the test methodology.

I look forward to your prompt response.

Sincerely,

Thomas G. Tomasello

TGT/dg/1003

xc: Mr. Steve Smallwood, by hand-delivery
Mr. Dan Thompson, by hand-delivery
Mr. Curt Barton
Mr. Mike Riddle

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

January 29, 1990

HAND DELIVERY

Mr. Terry Cole, Esquire
Mr. Tom Tomasselo, Esquire
Oertel, Hoffman, Fernandez & Cole, P.A.
Attorneys at Law
Post Office Box 6507
Tallahassee, Florida 32314-6507

Re: Seminole Kraft Corporation vs. DER;
OGC Case Number 89-0022
Operating Permit Number AO16-155275
for Number 3 Lime Slaker

Dear Terry and Tom:

Thank you for the suggested changes to my proposed specific conditions 10a and 10b, as set out in your January 26 letter. They are acceptable, assuming we agree on the legal effect of your version of Paragraph 10a.

Rule 17-2.700 F.A.C. Table 700-1 requires that particulate matter collection efficiency be demonstrated using EPA Method 5. Therefore, its inclusion in specific condition 10a is not necessary. I included it in my proposed specific condition 10a to make sure that your client was aware of, and agreed to, the fact that collection efficiency must be demonstrated using EPA Method 5, 40 CFR 60, Appendix A (July 1, 1988 version), until an alternative procedure, variance or rule change supersedes it. We can easily set forth this understanding in a settlement stipulation if you don't want it in specific condition 10a.

It goes without saying that if you are granted an alternative procedure to use in place of EPA Method 5 for compliance testing, then the permit provision requiring EPA Method 5 compliance testing will be, at that time, superseded. However, I see no harm in inserting the language you have requested. To cover all forseeable scenarios, shouldn't we, where you have added "or an alternative methodology approved by the Department pursuant to Rule 17-2.700(3), F.A.C.", also add "or a variance from EPA Method 5, or a modification to the Rule 17-2.700, F.A.C., Table 700-1 requirement that compliance testing for particulate matter be determined using EPA Method 5."

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

	Initial / Date
1. TO: (NAME, OFFICE, LOCATION) Claire Fancy	
2. ~~Jim PKP~~ Room 306F	
3. Bruce	
4.	

REMARKS:

RECEIVED
JAN 30 1990
DER - BAQM

INFORMATION	
	Review & Return
	Review & File
	Initial & Forward

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

FROM:

Jim-OGC

DATE 1/29/90

PHONE

8-9730

By agreeing to the language you have suggested, I assume we have settled the particulate matter emission limit issue. Still remaining is the estoppel issue. The Department is extremely interested in having a hearing officer determine whether estoppel applies in this case. If it does, the Department will need to institute new policies regarding the issuance of permits. If it does not, then we will know that we are not misleading applicants. I look forward to hearing from you.

Very truly yours,

Bill

William H. Congdon
Assistant General Counsel

CAF/il

cc: Clair Fancy

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

January 23, 1990

HAND DELIVERY

Mr. Terry Cole, Esquire
Oertel, Hoffman, Fernandez & Cole, P.A.
Attorneys at Law
Post Office Box 6507
Tallahassee, Florida 32314-6507

Re: Seminole Kraft Corporation vs. DER;
OGC Case Number 89-0022
Operating Permit Number AO16-155275
for Number 3 Lime Slaker

Dear Terry:

Here are my thoughts on where we stand with the above referenced matter.

Rule 17-2.650(2)(c)12, F.A.C., prohibits emission of particulate matter in excess of 0.03 gr/dscf. Exceptions to this limit can be granted if the pollution control device involved "has an actual particulate matter collection efficiency of at least 98 percent." Blacks Law Dictionary defines actual as "Real; substantial; existing presently in fact, having a valid objective existence as opposed to that which is merely theoretical or possible." Because actual efficiency cannot be determined before a facility is constructed, your client's construction permit, like all similar construction permits, set out emission limits based upon the theoretical efficiency contained in the underlying construction permit application.

Operation permits are issued for facilities which have been constructed and are in operation. At such facilities, collection efficiency can be, and must be, actually determined before a relaxation of the 0.03 gr/dsct standard is appropriate. A determination of actual efficiency requires testing. By Department rule, particulate emissions, and the efficiency of particulate emission removal, must be tested using EPA Method 5. (See Rule 17-2.700, Table 700-1)

Paragraph 4 of your petition lists the following disputed issues:

(a) Whether Petitioner's emissions comply with the emission limits established by the Constuction Permit;

(b) Whether DER had the authority to impose particulate emission limitations in the

operating permit that are more restrictive than those in the construction permit.

(c) Whether DER and BESD are estopped from issuing a more restrictive operating permit which was relied upon to its detriment by Petitioner by constructing a new scrubber to meet the requirements of the construction permit.

The Department agrees that the relaxed limits in the construction permit are presently being met. However, this relaxed limit was based upon the statements in the application that the source would achieve 99% efficiency. Paragraphs 4(b) and 4(c) of the Petition, which concern the restrictive limit in Specific Condition No. 10 of the draft operating permit, are well taken. To address the concerns raised in those paragraphs the Department is willing to settle this case by replacing Specific Condition No. 10 of the draft permit with Specific Condition Nos. 10a and 10b 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), 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). 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, shall be as follows:

Pt. No.	Pullutant	lbs/hr	T/yr	Other	Opacity
21	PM	3.2	7.0		
	VE				$\leq$ 5%
	00			None Allowed	

Specific Condition No. 5 of the construction permit requires that "Compliance test for PM [particulate matter] shall be demonstrated using EPA methods . . . 5 . . . ". Specific Condition No. 9 of the construction permit states, "To obtain a permit to operate, the applicant must demonstrate compliance with the conditions of the construction permit . . .". These two permit conditions, coupled with the wording of Rule 17-2.650(2)(c)12 F.A.C., reasonable notified your client that a demonstration of an actual collection efficiency using EPA Method 5 would be necessary in order to obtain the relaxed emission limitations in an operating permit.

The language proposed above for specific conditions 10a and 10b address your concern about the restrictive 0.22 lbs/hr limits contained in the draft operating permit. They fairly

reflect the emission limitations contained in the construction permit and contemplated by Rule 17-2.650(2)(c)12 F.A.C. They also make the contentions in paragraphs 4(b) and 4(c) of your petition moot.

A different but related issue is the anger expressed by your client during our conference call yesterday afternoon. Generally, people are angry when they feel they have been treated unfairly. Apparently he feels that fairness requires further delay in reaching the merits of your Petition. My review of the file convinces me that the Department has bent over backwards to allow your client to operate at relaxed particulate emissions limits in a situation where entitlement to those relaxed limits has not been demonstrated as required by law.

On December 20, 1988, the Department issued the challenged notice of permit. On January 5, 1989, your client request an extension of time for filing a petition concerning that notice, thereby allowing it to legally continue operations at the relaxed particulate matter emissions limit in the construction permit. Further extensions of time were granted until your petition was filed on August 11, 1989. On September 27, Tom Tomasello wrote Betsy Hewitt responding to the "request for additional information from Mr. Bill Thomas . . . concerning Seminole Kraft Corporation's request that the Department approve an alternative compliance testing procedure . . . ". Tom's letter goes on to state, "We feel that Seminole Kraft Corporation has provided adequate information for the Department to make a determination on its request. . . . Accordingly, we . . . feel it is beyond the scope of information reasonably required under Rule 17-2.700(3), F.A.C." To obtain the Departments concurrence in a continuance of the December 5th final hearing, your client agreed in late November to provide the requested alternative procedures information. By agreement of the parties at that time, Final Hearing was set for February 5.

If the Department prevails at that hearing, your client will have operated at relaxed particulate emission limits for approximately a year and a half after the expiration of its construction permit, without demonstrating entitlement to those relaxed limits. Attempting to end this grace period after 1 1/2 years does not seem to be unfair.

Can we settle this matter as I have suggested? Regardless of the outcome of this case, the Department will continue to process your client's request for an alternative procedure. I look forward to your response.

Very truly yours,

Bill

William H. Congdon
Assistant General Counsel

WHC/il
cc: Clair Fancy

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 DRAFT

DEPARTMENT OF ENVIRONMENTAL REGULATION'S
PRETRIAL COMPLIANCE

Respondent, State of Florida, Department of Environmenatl Regulation responds to the pretrial order entered herein as follows:

I. Statement Of The Nature Of The Controversy

This controversy envolves the particulate matter emission limit in the operating permit for the No. 3 Lime Slaker at Petioners' Jacksonville mill.

II. The Department's Position

Rule 17-2.650(2)(c)12, F.A.C., prohibits emission of particulate matter in excess of 0.03 gr/dscf. Exceptions to this limit can be granted if the pollution control device involved "has an actual particulate matter collection efficiency of at least 98 percent." Because actual efficiency cannot be determined before a facility is constructed, construction permits set out emission limits based upon the theoretical efficiency contained in

the underlying construction permit application. Operation permits are issued for facilities which have been constructed and are in operation. At such facilities, collection efficiency can be, and must be, actually determined before a relaxation of the 0.03 gr/dsct standard is appropriate. A determination of actual efficiency requires testing. By Department rule, particulate emissions, and the efficiency of particulate emission removal, must be tested using EPA Method 5. (See Rule 17-2.700, Table 700-1)

DRAFT

Petitioner's construction permit application asserted that the Goslin scrubber would be 99% efficient. Based upon that theoretical efficiency, particulate matter emission limits of 3.2 lbs/hr and 7 tons per year (TPY) were placed in the Petitioners construction permit. The Goslin scrubber was installed in a manner which precluded efficiency testing by EPA method 5. Construction permits allow a period of operation, during which an applicant can demonstrate an actual collection efficiency. If that demonstration shows an efficiency of 98% or greater, then the exception to Rule 17-2.650(2)(c)12 F.A.C. applies and appropriate limits are placed in the facilities operating permit. If the efficiency test demonstrates an efficiency of less than 98%, then the construction permit contains the Rule 17-2.650(2)(c)12 F.A.C., particulate matter emission limit of 0.03 gr/dscf. Since the Petitioner has not demonstrated a collection efficiency of greater than 98%, it is not entitled to any emission limit other than the 0.03 gr/dscf contained in Rule 17-2.650(2)(c)12 F.A.C.

III. List of Exhibits

A. Construction Permit Application

B. Construction Permit

C. Operating Permit Application

D. Draft Operating Permit

DRAFT

IV. Department Witnesses

Bruce Mitchell, P.E.
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

V. Admitted Facts

A. Petitioner has not demonstrated an actual collection efficiency, using EPA Method 5, of 98% or greater.

VI. Agreed Issues of Law

A. Rule 17-2.650(2)(c)12 F.A.C. applies to Petitioners No. III Lime Slaker.

B. Particulate matter collection efficiency must be demonstrated by EPA Method 5 unless an alternative procedure is approved by the Department or a variance from Rule 17-2.700, F.A.C. is granted.

C. The elements of estoppel are

1. that a representation of some material fact must have been made by the party estopped to the party claiming estoppel;

2. that representation is contrary to the condition of affairs later asserted by the estopped party;

3. the party claiming estoppel must have relied upon such representations and,

4. that because of such reliance, changed his position to his detriment.

VII. Disputed Factual Issues

A. whether a representation of some material fact was made by the Department to the Petitioner;

B. whether such representation is contrary to the condition of affairs later asserted by the Department;

C. whether the Petitioner relied upon such representations and,

D. whether Petitioner, because of such reliance, changed its position to its detriment.

DRAFT

VIII. Issues of Law To Be Determined

Whether Petitioner is entitled to a particulate matter emission limit less than the 0.03 gr/dscf contained in Rule 17-2.650(2)(c)12 F.A.C., without demonstrating an actual collection efficiency of 98% or greater.

Respectfully submitted,

WILLIAM H. CONGDON
Assistant General Counsel

*****

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 U.S. Mail, this _____ day of January, 1990.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

_____

WILLIAM H. CONGDON
Assistant General Counsel

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

DRAFT

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee
To: BRUCE M. Location:
To: Location:
To: Location:
From: Date:

Interoffice Memorandum

TO: District Air Program Administrators
Local Air Program Administrators

FROM: Jim Pennington, Administrator

DATE: December 22, 1989

SUBJ: ASP Request Seminole Kraft Corporation
ASP No. 89-C-01

Enclosed is a copy of an ASP request from the Seminole Kraft Corporation (SKC) for the use of mass balance analyses on the scrubber water inlet and outlet in lieu of EPA Method 5 at the scrubber inlet. SKC has requested to prove 98% scrubber efficiency to avoid a more stringent emission limit. Please review the request and send me your comments no later than January 31, 1990. In the interim review period, the company must continue to use the existing permitted methods for any tests due prior to review completion.

If you have any questions on the above, call Jim Pennington at SunCom 278-1344.

JP/plm

Enclosure (J. P. Subraman's letter dated 12/15/89 and received 12/15/89)

c: Roger O. Pfaff, USEPA w/Attachment
Bruce Mitchell w/Attachment
Syed Arif w/Attachment

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

ATTORNEYS AT LAW

M. CHRISTOPHER BRYANT
R. L. CALEEN, JR.
C. ANTHONY CLEVELAND
TERRY COLE
MARTHA J. EDENFIELD
SEGUNDO J. FERNANDEZ
KENNETH F. HOFFMAN
KENNETH G. OERTEL
HAROLD F. X. PURNELL
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JOHN H. MILLICAN
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

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

December 15, 1989

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

Re: Seminole Kraft Corporation;
Number 3 Lime Slaker Compliance Issues;
AO16-155275 (AC16-144791)

Dear Mr. Fancy:

This letter with attachments is to comply with the Department's earlier request for additional information regarding the Number 3 Lime Slaker. More specifically, we have attached the following:

1. Evaluation of mass balance approach to determine scrubber efficiency.

2. Letter from Goslin-Birmingham which indicates that testing the stack with and without the scrubber water is not a valid test of the scrubber's efficiency.

3. Estimate of cost to modify the Number 3 Slaker to allow EPA RM5 Inlet to scrubber emission testing.

We believe this information should provide the Department with the necessary justification to allow the use of the mass balance approach to demonstrate the efficiency of the wet scrubber on our Number 3 Lime Slaker. Further, we believe that the previous mass balance test which demonstrated a wet scrubber efficiency greater than 98% allows the Department to issue an operating permit for our Number 3 Slaker based on 17-2.650(2)(c)12 allowing a source to exceed 0.03 gr/dscf if the control device has a collection efficiency of 98% or greater. As indicated in our previous letter to you of November 13, 1989,

although we believe the mass balance testing justified an emission limit equal to that in the construction permit (3.2 lbs/hour), we would be willing to accept an emission limit for the Number 3 Lime Slaker of 1.0 lb/hour.

Please let us know if you have any questions.

Sincerely,

J. P. Subramani

JPS:slw

cc: Larry A. Stanley
Curt Barton
Mike Riddle
Tom Tomasello

copied: B. Mitchell
J. Heron
J. Pennington
J. Brown
G. Smallridge, OGC
B. Congdon, OGC
A. Kuritzkes, NEPAst
L. Pace, BESD

EVALUATION OF MASS BALANCE APPROACH TO DETERMINE SCRUBBER EFFICIENCY

Introduction

In 1988, Seminole Kraft Corporation replaced its existing No. 3 lime slaker with a new unit with an attached wet scrubber. The scrubber is a Goslin 36" positive draft unit which is constructed as an integral part of the lime slaker. There are approximately 30 or 40 scrubbers of this type typically used in the pulp and paper industry. The configuration of the lime slaker and the scrubber directly mounted on it does not allow for testing of the scrubber inlet using EPA Reference Method 5. Therefore, an alternate sampling procedure is needed to demonstrate the efficiency of the wet scrubber. On August 16, 1989, Seminole Kraft Corporation conducted tests utilizing the mass balance methodology to determine the scrubber inlet loading. A report summarizing the results of this alternate sampling procedure was submitted to DER on August 30, 1989.

Description of the Scrubber Operation

The lime slaking process is an exothermic reaction. Temperature in the slaking bowl is usually between 215°F and 220°F. The slaking process is a continuous operation and the steam evolved is at the equilibrium conditions encountered in the slaking bowl. The scrubber which is mounted on to the slaking bowl with a 35" flange is in close proximity to the rising steam. As steam enters the scrubber, the water sprays condense the steam thus creating the necessary draft to pull additional steam into the scrubber from the

slaking compartment. After the first series of sprays, the flow of gas enters at a right angle into a second scrubber compartment where another set of sprays cool the gas stream which reduces the temperature further and creates the necessary draft for the exhaust gases to exit approximately at a velocity of 10 feet per second or greater. The scrubber water drains to the mill sewer system.

On December 1, 1989, I made an on-site inspection of the scrubber in question and closely observed its operation along with the slaking process which was under normal operating conditions. There were no fugitive emissions from the slaking compartment or from the scrubber. (If there were, it would be readily seen by the naked eye because of the escaping steam plume). It was obvious that the mass balance methodology would yield valid results on a scrubber system such as the one used in the lime slaker at Seminole Kraft Corporation.

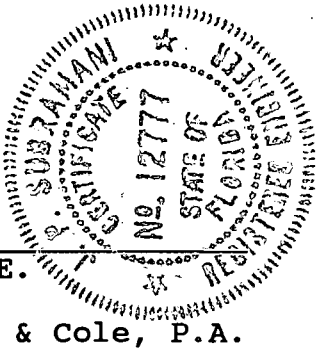
Scrubber Inlet Loading Determination

The water flow to the slaker was measured using a portable doppler flow meter. A 500 ml sample of the scrubber inlet water was collected at the beginning of the test and another sample collected at the end of the test. Eight samples, each 500 ml, of the scrubber outlet (drain) were collected at one hour intervals during the test cycle. A subsample of 75 ml was transferred from each sample into a beaker, evaporated to dryness and the mass loadings were averaged for inlet and outlet of the scrubber. The difference between these averages produced the net mass loading of particulates carried to the mill sewer.

A stack test using EPA Reference Method 5 was conducted to determine the stack particulate emission, and the scrubber efficiency was determined using the balance analysis.

Conclusion

The mass balance methodology utilized by Seminole Kraft Corporation to determine the scrubber inlet loading produced valid results. The calculations employed to determine the particulate loading of the scrubber yielded a conservative estimate. These calculations did not account for the condensed steam in the scrubber which is also discharged to the drain. Accounting for the condensed steam would produce a higher mass loading of the scrubber drain (see attached calculations).



Dec. 15, 1989

J. P. Subramani, Ph.D., P.E.
Environmental Consultant
Oertel, Hoffman, Fernandez & Cole, P.A.
2700 Blair Stone Road, Suite C
Tallahassee, Florida 32301

Florida Registration No. 12777

JPS:gg

Attachment

ESTIMATE OF SCRUBBER EFFICIENCY

Average flow to scrubber = 110 gal/min
= 918 lbs/min
Scrubber inlet temperature = 90°F (assumed)
Scrubber outlet temperature = 195°F
Slaker bowl temperature = 220°F
Enthalpy of saturated water @ 220°F = 188.23 BTU/lb
Amount of steam condensed = X lbs/min

Net heat gain by scrubber water = (918) (195-90) = 96,390 BTU/min

Amount of steam condensed = $\frac{96,390}{188.23}$ lbs/min

= 512 lbs/min
= 61 gals/min*

Scrubber outlet flow = 110 + 61 or
= 171 gals/min

Average scrubber drain mass loading = 0.1537 gms/75 ml
(Freshwater to Scrubber) = $\frac{(0.1537)\ (171)\ (3.785)\ (1000)}{(75)\ (453.6)} = 2.924 \frac{\text{lbs}}{\text{min}}$

= 175.44 lbs/hour

Average scrubber inlet mass loading = 0.0277 gms/75 ml

= $\frac{(0.0277)\ (110)\ (3.785)\ (1000)}{(75)\ (453.6)} = 0.339 \frac{\text{lbs}}{\text{min}}$

= 20.34 lbs/hour

Net mass loading to the drain = 155.10 lbs/hour

Emission = $\frac{\text{stack emission}}{\text{stack emission + drain loss}}$

= $\frac{0.31}{0.31 + 155.10}$

= 0.2 percent
Scrubber Efficiency = 99.8 percent

***Weight of water vapor emitted through the stack was estimated at less than 1 gal/min**

GOSLIN-BIRMINGHAM
A Division of Green Bay Packaging, Inc.

3401 8th Avenue North
Birmingham, Alabama 35222

Please reply to
Post Office Box 398
Birmingham, Alabama 35201

Telephone 205/324-7511
Telex 59-825

November 21, 1989

Seminole Kraft
Post Office Box 26998
Jacksonville, FL 32218

ATTENTION: Mr. Mike Riddle

REFERENCE: Goslin Slaker Scrubber

Gentlemen:

We are writing in response to your questions regarding modification of the Slaker Scrubber arrangement to facilitate testing. You asked about placing a 10' x 36" pipe between the slaker and scrubber.

There are approximately 30 or 40 scrubbers of this type in service in similar application. To our knowledge, all are mounted directly on the slaker. We have no data to support the impact of such an installation. The draft created by the scrubber serves only to direct the steam toward the scrubber and is quite small. Any additional restrictions or limitations can only impede the performance. The wet lime particles are sticky and will quickly build up on the walls of the pipe. You cannot wash this with water because it will dilute the contents of the slaker. Washing with green liquor will likely exacerbate the problem.

With the long stack you have installed, you do have some chimney effect. However, most of the draft is created by the condensing of the steam with the cool water showers. The gas flow will be significantly reduced by cutting off the shower flow. Testing the stack with and without shower water is not a valid test of the performance of the scrubber.

I hope we have sufficiently responded to your questions. Please call if you need further information.

Very truly yours,

GOSLIN-BIRMINGHAM
A Division of Green Bay Packaging, Inc.

RICHARD L. HEADLEY
Sales Engineer

RLH:bel

L-Semino.brh

Modifications to No.3 Slaker to Allow EPA RM5 Inlet to Scrubber Emission Testing

Purpose

Florida DER has indicated a desire to determine the particulate removal efficiency of the scrubber on the No.3 Lime Slaker. Unfortunately, when Florida DER approved the installation of the No.3 Lime Slaker and attached wet scrubber, they did not indicate a RM5 test of the inlet to the scrubber would be required and, therefore, did not object to the fact the wet scrubber was directly coupled to the scrubber bowl, hence precluding testing the scrubber inlet using EPA RM5. This document outlines the modifications which would be required to allow testing the scrubber inlet using EPA RM5.

Scope and Cost Estimates

The proposed modifications and associated costs are shown on Attachment A. A drawing showing the proposed modifications is also attached. As can be noted, the scope includes demolition of some existing materials, reinstallation of the scrubber, associated piping, structural supports, electrical equipment and because the scrubber will no longer draft naturally, a new induced draft fan.

Modification Assumptions

1. EPA RM5 for determination of particulate matter emission require duct configurations that allow for proper measurement of gas flow. These required parameters are $\geq$ 2 duct diameters upstream from sample ports and $\geq$ 0.5 duct diameters downstream of sample ports free of obstructions to flow.

   Inlet duct diameter is 36"
   2 x 36" = 72"
   0.5 x 36" = 90" = 7'6"
   Say 10' for better access

2. The scrubber must be removed from the slaker. A corresponding 10' section of exhaust stack must be removed. A new/modified fresh water supply header must be run. A 10' extension must be added to the scrubber drain line.

3. The scrubber will not support its own weight at the new height, so structural steel must be added to the slaker to support the scrubber and provide safe access to the inlet.

4. The scrubber manufacturer (Goslin-Birmingham) has reservations about proper operation of the scrubber at the remotely mounted position (see attachment B), so we have added on induced draft fan to maintain the draft generated at the close coupled position.

5. The cost estimates are based on a general contractor performing the work on a five day scheduled outage of the slaker at the standard labor charge rates. Reduction in the downtime of the slaker would increase labor costs.

6. If this work had to be performed outside a scheduled outage, an additional cost for lost production would have to be added.

Reservations

These modifications to the Goslin-Birmingham posidraft scrubber would allow an attempt to run EPA RM5 on the inlet to the scrubber. However, we would like to reiterate the reservations on the likely success of the testing we expressed in our November 13, 1989 letter to you. We still feel that conditions in the inlet duct of the scrubber (stack temperature > 200^{o}F and saturated with moisture > 80%) would preclude the successful testing of the particulate emissions by EPA RM5. Accordingly, we still feel a mass balance approach is the only way to analyze the scrubbers inlet loading and efficiency.

Summary

The modifications to the No.3 Lime Slaker required to allow using EPA RM5 to measure the wet scrubber inlet particulate loading are substantial. The scrubber must be relocated to a point 10' above the slaker, new ductwork and plumbing must be installed and an induced draft fan must be purchased and installed to insure proper draft through the wet scrubber. The total installed cost for the project is estimated to be $35,500.

Attachment A

Modifications to Slaker/Scrubber 12/04/89

	Labor	Material	Equipment	Total
I. Demolition				
A. Piping	$3,000			$3,000
1. Cut and Remove 10' of 12" exhaust stack				
2. Remove 10" drain line at Scrubber				
B. Scrubber	$1,000			$1,000
1. Remove				
II. Installation				
A. Piping	$6,000	$5,000		$11,000
1. Raise and weld 12" exhaust stack from Scrubber				
2. Fabricate and install 10' of 36" stainless steel line from Scrubber to Slaker				
3. Fabricate and install 10' of 10" drain line from Scrubber				
4. Fabricate and install new water header				
B. 15" Fan (Industrial Air Inc.)	$2,000	$500	$3,500	$6,000
1. Duct miser				
a. Model No. 041f015NQ				
C. Scrubber	$2,000	$1,500		$3,500
1. Structural supports and ladders	$3,000	$3,000		$6,000
III. Electrical	$3,000	$2,000		$5,000
Total	$20,000	$12,000	$3,500	$35,500

Attachment B

GOSLIN-BIRMINGHAM
A Division of Green Bay Packaging, Inc.

3401 8th Avenue North
Birmingham, Alabama 35222

Please reply to
Post Office Box 398
Birmingham, Alabama 35201

Telephone 205/324-7511
Telex 59-825

November 21, 1989

Seminole Kraft
Post Office Box 26998
Jacksonville, FL 32218

ATTENTION: Mr. Mike Riddle

REFERENCE: Goslin Slaker Scrubber

Gentlemen:

We are writing in response to your questions regarding modification of the Slaker Scrubber arrangement to facilitate testing. You asked about placing a 10' x 36" pipe between the slaker and scrubber.

There are approximately 30 or 40 scrubbers of this type in service in similar application. To our knowledge, all are mounted directly on the slaker. We have no data to support the impact of such an installation. The draft created by the scrubber serves only to direct the steam toward the scrubber and is quite small. Any additional restrictions or limitations can only impede the performance. The wet lime particles are sticky and will quickly build up on the walls of the pipe. You cannot wash this with water because it will dilute the contents of the slaker. Washing with green liquor will likely exacerbate the problem.

With the long stack you have installed, you do have some chimney effect. However, most of the draft is created by the condensing of the steam with the cool water showers. The gas flow will be significantly reduced by cutting off the shower flow. Testing the stack with and without shower water is not a valid test of the performance of the scrubber.

I hope we have sufficiently responded to your questions. Please call if you need further information.

Very truly yours,

GOSLIN-BIRMINGHAM
A Division of Green Bay Packaging, Inc.

RICHARD L. HEADLEY
Sales Engineer

RLH:bel

L-Semino.brh

PM
11-29-89
Jacksonville, FL

file copy

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services

November 28, 1989

RECEIVED
NOV 29 1989
DER - BAQM

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

Re: Seminole Kraft Corporation - No. 3 Lime Slaker (AC16-144791)

Dear Mr. Fancy:

Bio-Environmental Services Division (BESD) has received correspondence dated November 13, 1989 from Seminole Kraft Corporation (SKC). SKC has proposed in this correspondence a particulate emission limit of 1.0 pound per hour (4.38 tons per year). BESD, in error, had previously attempted to permit this unit to operate with a particulate emission limit of less than 1.0 ton per year pursuant to Section 17-2.650(2)(b)3. which had been demonstrated with a valid EPA Reference Method 5 test. BESD does not find SKC's proposal acceptable.

Section 17-2.650(2)(c)12. establishes a particulate matter emission limit of 0.03 gr/DSCF. This section provides an alternative emission limit only if a control device of 98% efficiency or greater is employed. The previously mentioned test did not meet the standard of 0.03 gr/DSCF nor has the spray scrubber demonstrated a minimum efficiency of 98%.

Therefore, without a demonstration of a minimum of 98% efficiency, BESD must insist that the 0.03 gr/DSCF emission limit be enforced.

Please address any comments to the undersigned.

Very truly yours,

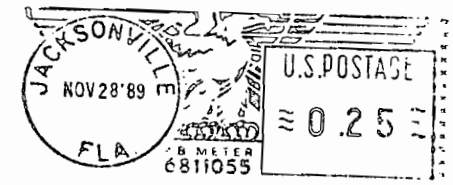
Ronald L Roberson

Ronald L. Roberson
Associate Engineer

RLR/rlj

cc: Mr. A. Kutyna, P.E., DER
BESD Air Permitting File
BESD File 2155-EE
cc: B. Mitchell
CHF/BT
B. Hewitt, OGC

BIO-ENVIRONMENTAL SERVICES
Noise Pollution Control Activity
421 West Church Street
Jacksonville, Florida 32202-4111



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

Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

November 13, 1989

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

Dear Mr. Fancy:

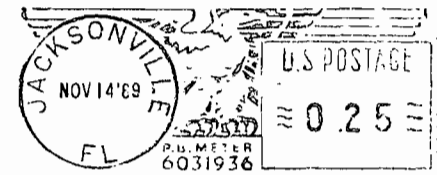
This is in response to your November 6, 1989 letter regarding the No.3 Lime Slaker issue (AC16-144791). In your letter the Department proposed an alternative to our mass balance approach to determine the efficiency of the wet scrubber on the No.3 Lime Slaker. Unfortunately, the design of the Slaker will not allow the testing to be carried out in the manner suggested, as discussed below.

More specifically, the No.3 Lime Slaker at Seminole Kraft is fitted with a Goslin Birmingham posidraft condensing scrubber. This scrubber is closely coupled to the slaker bowl and depends on this proximity to function properly. As the lime slaking takes place in the bowl of the slaker, steam is evolved by this exothermic reaction. When the steam enters the scrubber, the cool scrubber water condenses the steam creating a vacuum. This causes more steam to be pulled into the scrubber and the continuously condensing steam provides the draft required to continuously pull air from the slaker bowl through the wet scrubber. This also creates a very small vacuum on the slaker bowl to protect against fugitive emissions.

Hence, this condensing scrubber, unlike a baghouse or an electrostatic precipitator, depends on the water sprays in the scrubber to create the necessary draft for the system to run as well as remove the particulate prior to being emitted to the atmosphere. Without the cool water spray operating, there will be very little draft created and particulate will settle in the slaker and

Seminole Kraft Corporation

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



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

scrubber as well as be emitted as fugitive dust. Indeed, the scrubber construction, which requires the exhaust gas to take two right angle turns before it can exit the vent, will facilitate gravity settling of particulate matter in this mode of operation. This will result in a lower than actual inlet loading measurement at the outlet sampling port during the scrubber water-off test the Department has suggested.

In addition, without the scrubber water sprays operating, the stack gas will come to temperature equilibrium with the slaker bowl. This will cause the stack gas to rise to greater than 200^{o}F and to be saturated with moisture (>80% moisture). Under these conditions, EPA method 5a and 2 are not very accurate or precise. This error could be very substantial at the very low velocities and grain loadings expected during such a test.

The information presented above indicates that the test procedure proposed by the Department to determine the inlet scrubber particulate loading (and, hence, scrubber efficiency) by turning off the scrubber water and measuring the particulate inlet loading at the scrubber outlet sampling port will not produce representative values. Indeed, such a test will bias the scrubber inlet loading to the low side and would indicate a lower than actual scrubber efficiency as well. Accordingly, Seminole Kraft still believes that the mass balance approach previously discussed with the Department, and for which we have submitted results indicating the wet scrubber efficiency is greater than 98%, is the best technical approach to use in this situation.

However, Seminole Kraft believes, as we hope the Department believes, that entirely too much time has been expended by both parties on a matter involving such a small amount of particulate emissions. Accordingly, to settle this matter, Seminole Kraft is prepared to accept a particulate emission limit for the No.3 Lime Slaker of 1.0 lb/hour. This is less than one-third the particulate emission limit (3.2 lb/hr) granted by the Department in the construction permit issued for this source in 1988 and requested for the new operating permit based on the fact the wet scrubber has an efficiency greater the 98%, per Rule 17-2.650(2)(c)12.

As indicated previously, we believe the particulate limit of 0.22 lb/hr previously proposed by the Department and BESD, is unnecessarily stringent and is not required by DER's regulations for miscellaneous manufacturing process operations whose control devices exceed 98% efficiency.

We would be pleased to meet with you in the near future to discuss this further.

Sincerely,

L.A. Stanley
General Manager

ah

CC: S. Smallwood, DER

R. Pfaff, EPA
B. Thomas, DER
B. Hewitt, DER
T. Cole
C. Barton
S. Pace, BESD
J. Brown, BER
B. Mitchell, DER
G. Smallridge, DER
M. Riddle
W. Congeon, DER

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
General Manager
Seminole Kraft Corp.
9469 Eastport Road
Jacksonville, FL 32218-0998

4. Article Number
P 938 762 738

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 — Address
X

6. Signature — Agent
X

7. Date of Delivery
11-7-89

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

PS Form **3811**, Mar. 1988 * U.S.G.P.O. 1988-212-865 **DOMESTIC RETURN RECEIPT**

P 938 762 738

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

Sent to Mr. L. A. Stanley, Seminole Kraft Corp.	
Street and No. 9469 Eastport Rd.	
P.O., State and ZIP Code Jacksonville, FL 32218	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date Mailed: 11-6-89 Permit: AC 16-144791	

PS Form 3800, June 1985

File Copy

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

November 6, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Stanley:

Re: No. 3 Lime Slaker Compliance Issues
AC 16-144791

On September 20, 1989, the Department requested in writing information on the No. 3 Lime Slaker and its associated control system relating to issues of compliance and the ASP request. The Department received a letter from Mr. Tom Tomasello on September 27, 1989, stating that Seminole Kraft Corporation will not provide the information requested in the September 20 letter. Therefore, the Department deems the ASP request insufficient and incomplete pursuant to F.A.C. Rule 17-2.700(3). Processing of the request for an ASP will resume and the status ascertained upon receipt of the requested information.

For the purposes of reaching a resolution of the upcoming administrative hearing, the Department offers the following procedures and conditions pursuant to Section 403.061(18), F.S., as a one-time means of demonstrating an efficiency for the control device associated with the No. 3 Lime Slaker and to establish particulate matter emission factors from this system:

1) Perform 3 sets of mass tests for particulate matter (PM) using EPA Reference Method 5, 40 CFR 60, Appendix A;

    a) A set of PM mass tests shall be 2 consecutive test runs; the first test run to be conducted with the control system off and the second test run to be conducted immediately thereafter and with the control system operating; and, both test runs of each set must be conducted with the source operating at the same production rate;

b) Each set of tests must be conducted on the same day in order to achieve similar operational parameters;

2) The test ports shall be the existing post-control outlet ports in accordance with EPA Reference Method 2, 40 CFR 60, Appendix A;

3) The Department's Bureau of Air Regulation and Northeast District and the Duval County's Bio-Environmental Services Division shall be notified in writing at least 15 days prior to testing; and,

4) Results of the tests and the test reports shall be submitted to the agency representatives stated in No. 4 above within 45 days of the last test run.

Please notify me in writing within 7 days of receipt of this letter of your acceptance or rejection of this offer. If there are any questions, please call Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,

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

CHF/BM/t

cc: S. Smallwood, DARM
S. Pace, BESD
R. Pfaff, EPA
J. Brown, BAR
B. Thomas, BAR
B. Mitchell, BAR
B. Hewitt, DER
G. Smallridge, DER
T. Tomasello, O & H
J. P. Subarmani, O & H
Reading File
CHF
Jim Pennington
} 11-6-89 RBM

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Betsy Hewitt

FROM: Clair Fancy

DATE: October 5, 1989

SUBJ: Seminole Kraft Corporation versus DER
OGC Case #89-0022
Operating Permit No. AO 16-155275 for # 3 Lime Slaker

This is in response to Mr. Tom Tomasello's letter to you dated September 27, 1989. The company has applied for an alternate sampling procedure for the testing of the No. 3 Lime Slaker. One of the issues is that they must prove 98% control. The only authorized method for doing this is simultaneous inlet and outlet testing. There is not enough room between the air pollution control device and the source to do a proper inlet test. One of the major considerations is how much cost will be incurred by the company in adding additional duct work. This seems totally within the realm of asking for additional information. Bill Thomas and I both believe that any statement as to costs must be certified by a professional engineer. This is clearly an engineering question.

Additionally, the Division is working on trying to come up with an alternate sampling procedure that satisifies the BESD, the rule, and the technical staff in the Division. Even though the emissions from this source are indeed small, the rule is explicit that this type of source must meet either .03 grains/dry standard cubic foot, or prove 98% control efficiency from the pollution control device. One idea that we are considering that might satisfy all parties concerned is to perform one set of tests with the pollution control device on, and immediately thereafter do another set of tests with the pollution control device off. This would give a reasonably close approximation as to the inlet and outlet. The source would have to be allowed to operate without the pollution control device operating for several hours while the second set of tests were being completed.

CHF/kt

cc: S. Smallwood
J. Pennington
B. Thomas
B. Mitchell

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

ATTORNEYS AT LAW

M. CHRISTOPHER BRYANT
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MARTHA J. EDENFIELD
SEGUNDO J. FERNANDEZ
KENNETH F. HOFFMAN
KENNETH G. OERTEL
HAROLD F. X. PURNELL
PATRICIA A. RENOVITCH
SCOTT SHIRLEY
THOMAS G. TOMASELLO
W. DAVID WATKINS

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

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

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

September 27, 1989

Ms. Betsy Hewitt
Assistant General Counsel
Office of General Counsel
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Seminole Kraft Corporation vs. DER;
OGC Case Number 89-0022;
Operating Permit Number AO16-155275
for Number 3 Lime Slaker

Dear Ms. Hewitt:

This letter responds to the attached request for additional information from Mr. Bill Thomas, Bureau of Air Regulation, concerning Seminole Kraft Corporation's request that the Department approve an alternate compliance testing procedure for the No. 3 Lime Slaker at its paper mill in Jacksonville. We feel that Seminole Kraft Corporation has provided adequate information for the Department to make a determination on its request. At the August 31 meeting with the Department, and through a follow-up letter from Dr. J. P. Subramani of our firm to Mr. Clair Fancy, a copy of which is attached, Seminole Kraft Corporation adequately explained the reason and necessity for utilizing alternate testing procedures. Accordingly, we are disappointed by Mr. Thomas' request for additional information and feel it is beyond the scope of information reasonably required under Rule 17-2.700(3), F.A.C.

The operating permit contains a new provision that requires Seminole Kraft Corporation to demonstrate the efficiency of the scrubber using EPA Reference Method 5, even though the construction permit did not impose such a requirement. This permit condition is under dispute in the formal administrative

proceeding. Seminole Kraft Corporation is not obligated to undertake any additional activities to supplement the information on scrubber efficiency that it provided in its construction permit application. However, in view of the relatively insignificant quantity of particulate emission from the No. 3 Lime Slaker, and in a good faith effort to resolve this matter, Seminole Kraft Corporation voluntarily collected additional data using alternate sampling techniques and provided that information to the Department. Unfortunately, in response to our efforts, the Department is now asking that we provide an assessment of the itemized costs of physical changes that are needed to utilize EPA Method 5, under a Florida Registered Professional Engineer's seal. Seminole Kraft Corporation submits that the Department's request is unreasonable and unnecessary.

Based on test results of the alternate sampling procedure, Seminole Kraft Corporation has demonstrated that the scrubber's efficiency is better than 99 percent. The basis of Seminole Kraft Corporation's request that the Department accept its alternate sampling procedure, in lieu of EPA Reference Method 5, is that Seminole Kraft Corporation has already spent substantial funds installing a new scrubber following issuance of the construction permit, and that the sampling procedure used by Seminole Kraft Corporation demonstrates compliance. Thus, it is unnecessary to modify the scrubber.

Seminole Kraft Corporation wants to resolve this issue in an amicable manner and is willing to accept a permit provision based on the ability of the scrubber to reliably perform at better than 98 percent removal using the alternate testing procedure. We believe this is a rational approach to resolve the issue and hope the Department will concur. If you need additional information, please let me know. I look forward to your response and to resolving our concerns.

Sincerely,

Tom Tomasello

Tom Tomasello

TGT:slw

Attachments

cc: Mr. L. A. Stanley
Mr. Mike Riddle
Mr. Curt Barton
Mr. Clair Fancy

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:	4. Article Number
Mr. L. A. Stanley General Manager Seminole Kraft Corp. 9469 Eastport Road Jacksonville, FL 32218-0993	P 938 762 683
	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 — Address X	8. Addressee's Address *(ONLY if requested and fee paid)*
6. Signature — Agent X L. Gail Enman	
7. Date of Delivery	

SEP 22 1989 JACKSONVILLE, FLORIDA

PS Form **3811**, Mar. 1988 ★ U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 938 762 683

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

Sent to Mr. L. A. Stanley, Seminole Kraft Corp.
Street and No. 9469 Eastport Rd.
P.O. State and ZIP Code Jacksonville, FL 32218-0993

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: 9-20-89 Permit: No. 3 Lime Slaker	

PS Form 3800, June 1985

Florida Department of Environmental Regulation

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

Bob Martinez, Governor | Dale Twachtmann, Secretary | John Shearer, Assistant Secretary

September 20, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Stanley:

Re: No. 3 Lime Slaker

In order to assist the Department in evaluating the No. 3 lime slaker issue associated with compliance testing, please submit under a Florida Registered Professional Engineer's seal an itemized assessment of all the costs to be incurred and physical changes to be made to insert ducting between the No. 3 lime slaker and its associated scrubber to minimally meet the requirements of EPA Reference Method 2 pursuant to 40 CFR 60, Appendix A; also, include all calculations, reference material, assumptions, and any pertinent material used to assess the above request.

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

Sincerely,

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

CHF/BM/t

cc: R. Roberson, BESD
M. Benjamin, NE District
B. Hewitt, Esq., DER
T. Cole, Oertel & Hoffman

TO: Jim Pennington DATE DUE: 10/6

FROM: Clair Fancy

DATE: 9/25/89 DATE COMPLETED: _____

SUBJ: Seminole Kraft ASP request

Please accomplish the following job assignment by the date due.

Review ASP request for completness and proper procedure and have draft letter, memos, etc for me to review. Please get input from Bill Thomas and Bruce Mitchell as they are very aware of issues. Bruce and I had a possible compromise on this.

CC: Bill Thomas

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

ATTORNEYS AT LAW

M. CHRISTOPHER BRYANT
R. L. CALEEN, JR.
C. ANTHONY CLEVELAND
TERRY COLE
MARTHA J. EDENFIELD
SEGUNDO J. FERNANDEZ
KENNETH F. HOFFMAN
KENNETH G. OERTEL
WILLIAM E. POWERS, JR.
HAROLD F. X. PURNELL
PATRICIA A. RENOVITCH
SCOTT SHIRLEY
W. DAVID WATKINS

SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

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

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

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

September 20, 1989

Clair H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Seminole Kraft Corporation; No. 3 Lime Slaker, Operating Permit No. A016-155275; Request for Approval of Alternate Sampling Procedures

Dear Mr. Fancy:

This letter is a follow-up to our meeting on August 31 concerning the applicable particulate emission limitation for Seminole's No. 3 Lime Slaker, pursuant to F.A.C. Rule 17-2.650 (c)12. At the meeting we provided a report that summarized the results of a special alternate test conducted on the Lime Slaker. This letter is to request Department approval of that alternate sampling procedure under F.A.C. Rule 17-2.700(3).

In its construction permit application for installing a scrubber on No. 3 Slaker, Seminole proposed a Goslin 36" positive draft scrubber as an integral part of the slaker and without a port for inlet sample collection. The design features and the volumetric flow rate were provided to the Department. Documentation on the expected efficiency of the scrubber at better than 98 percent removal efficiency was also provided to the Department.

Upon issuance of the construction permit, Seminole installed the scrubber. Subsequently, Seminole is being required by the Department to document the 98 percent removal efficiency by taking samples of the inlet and outlet using EPA Method 5 procedures. Since there is no room to install an inlet port in accordance with the reference method, Seminole is forced to rely on alternate test procedures to demonstrate compliance with the 98 percent removal requirement.

I have attached an additional copy of the report which was provided at the August 31 meeting. Approval of this alternate sampling procedure will be greatly appreciated.

Sincerely,

J. P. Subramani

JPS:gg

Attachment

cc: Mr. Mike Riddle
Mr. Curt Barton
Mr. Ernie Frey
Mr. Terry Cole

SPECIAL REPORT

NO.3 LIME SLAKER

WET SCRUBBER PERFORMANCE

Purpose

The test described in this report was conducted to demonstrate the efficiency of the wet scrubber on No.3 Lime SLaker.

Description of test

The integral design of the wet scrubber on the No.3 Lime Slaker does not allow a determination of the wet scrubber inlet particulate loading using EPA-RM5. There is no room to properly install ports for the test probe and inlet gas conditions (>212°F supersaturated) would not allow the sampling methodology to work. Therefore, the method chosen to demonstrate the scrubber efficiency was a mass balance approach.

The water flow into the scrubber was determined. The particulate concentration was determined on both the inlet to the scrubber and drain from the scrubber. A particulate mass rate was then determined for both the inlet water flow and the scrubber drain. Finally, the particulate mass loading to the scrubber was the difference between the mass input in the fresh water and the mass discharged through the drain.

The water flow into the scrubber was used for both inlet and outlet flows in the scrubber. This was a conservative approach because the volume of water emitted through the scrubber vent should be less than the volume of water condensed in the scrubber from the slaking process. This would make the scrubber discharge volume used in the calculations lower than the actual discharge volume and therefore makes the calculated mass loading to the scrubber lower than the actual mass loading. We also believe that the amount of water condensed in the scrubber and discharged through the stack are very minor when compared to the flow of fresh water to the scrubber.

Result of test

The results of the stack test on the No.3 Lime Slaker are shown on Attachment A. The average particulate emissions were 0.31 lb/hr.

The results from testing the scrubber water (in and out) are shown on Attachment B. The wet scrubber inlet particulate

loading calculations are shown on Attachment B. The wet scrubber inlet particulate loading was 95.01 lb/hr.

The particulate removal efficiency of the wet scrubber is calculated on Attachment C. The particulate removal efficiency was 99.7%.

Conclusion

This test demonstrates that the wet scrubber on the No.3 Lime Slaker has an efficiency exceeding 98%. Under rule 17-2.650(2)(c)12, FAC, a source which has no specific RACT emission limitations is allowed to emit in excess of 0.03 gr/dscf if the control device has a collection efficiency of 98%.

Recommendations

Based on this demonstration, DER should issue an operating permit for the No.3 Lime Slaker with the same conditions as were contained in the construction permit for this source. Specifically particulate matter emissions shall not exceed 3.2 lb/hr and 7 TPY. Visible emissions shall be limited to no more than the average opacity achieved during a compliance test, which establishes compliance with the standard, plus 5% opacity.

ATTACHMENT A

SEMINOLE KRAFT PARTICULATE CALCULATIONS

SOURCE : SLAKER No. 3 DATE: 8-16-89

INPUT DATA

	RUN 1	RUN 2	RUN 3	AVG.
TIME STARTED	1126	1255	1437	
TIME FINISHED	1230	1421	1548	
BAROMETRIC PRESSURE,in Hg	30.07	30.07	30.07	30.07
METER CORRECTION FACTOR	1.04	1.04	1.04	1.04
METER VOLUME, cu ft	48.480	49.070	50.954	49.501
AVG DELTA-H, in water	2.03	1.89	2.03	1.98
AVG METER TEMP, deg F	117	121	123	120
VOL. LIQUID COLLECTED,ml *	240	293	286	273
SILICA GEL WEIGHT CHANGE,g	12.7	14.9	19.2	15.6
CARBON DIOXIDE CONTENT,%	0.0	0.0	0.0	0.0
OXYGEN CONTENT,%	20.0	20.0	20.5	20.2
NITROGEN CONTENT,%	80.0	80.0	79.5	79.8
AVG SRT DELTA-P,in water	0.19	0.18	0.19	0.18
AVG STACK TEMP,deg F	139	144	142	142
AVG STACK PRES., in Hg	30.07	30.07	30.07	30.07
STACK AREA, sq ft	0.785	0.785	0.785	0.79
NET RUN TIME, hrs	1.0	1.0	1.0	1.0
NOZZLE SIZE, in	0.55	0.55	0.55	0.550
PARTICULATE WEIGHT, g	0.3089	0.2762	0.3263	0.3038

CALCULATED DATA

	RUN 1	RUN 2	RUN 3	AVG.
VOL METER, SDCF	46.606	46.833	48.480	47.307
VOL CONDENSATE, SDCF *	11.910	14.511	14.384	13.602
GAS MOISTURE CONTENT,% *	20.4	23.7	22.9	22.3
DRY GAS MOLECULAR WT.	28.80	28.80	28.82	28.81
STACK GAS MOLECULAR WT.	26.60	26.25	26.34	26.40
GAS VELOCITY, FPS	11.56	11.18	11.58	11.44
GAS FLOW RATE, ACFM	544	527	545	539
GAS FLOW RATE, SDCFM	384	353	371	369
GAS FLOW RATE, SDCFH	23047	21196	22248	22164
ISOKENETIC RATE, %	96.3	105.2	103.7	101.7
PARTICULATE CONC, gr/cu ft	0.1023	0.0910	0.1039	0.0990
PARTICULATE CONC.,lb/cu ft	1.5E-05	1.3E-05	1.5E-05	1.4E-05
MASS EMISSION RATE, lb/hr	0.34	0.28	0.33	0.31

* DATA CORRECTED TO SATURATION AT STACK TEMPERATURE

ATTACHMENT B

Field Data
Slaker Water Flow and Solids Loading

The water flow to the slaker was measured using a portable doppler flow meter. This meter reads water velocity in the pipe. Volumetric flow is calculated from pipe diameter and a conversion factor.

Example calculation:

$$\text{gallons per minute} = (\text{pipe diameter})^2 \times (\text{velocity}) \times 2.45$$

Where: pipe diameter is in inches, velocity is in feet per second
2.45 is a conversion factor.

Water pipe feeding slaker scrubber is 4 inch schedule 40 stainless with an internal diameter of 4.03 inches.

DATA

Date	Time	Velocity	Flow
8/16/89	1100	3.0	119
8/16/89	1200	2.95	117
8/16/89	1300	2.95	117
8/16/89	1400	2.6	103
8/16/89	1500	2.6	103
8/16/89	1600	2.5	100

Average: 110 gpm

DATA

Solids analysis of scrubber water

Sample ID	Sample No.	Time	Sample Size	Beaker tare	Beaker w/sample	$\triangle$ Weight
inlet water	In_1	930	75 ml	47.9110	47.9328	0.0217
inlet water	In_2	1630	75 ml	57.7679	57.8013	0.0336
scrubber	0_1	930	75 ml	60.2748	60.4213	0.1466
drain	0_2	1030	75 ml	57.7780	57.9006	0.1226
"	0_3	1130	75 ml	66.1722	66.3269	0.1546
"	0_4	1230	75 ml	65.7772	65.9511	0.1740
"	0_5	1330	75 ml	65.9570	66.0962	0.1392
"	0_6	1430	75 ml	68.9192	69.0614	0.1522
"	0_7	1530	75 ml	67.8210	67.9866	0.1655
"	0_8	1630	75 ml	70.1460	70.3210	0.1750

average inlet water $\triangle$ weight 0.0277
average scrubber drain $\triangle$ weight 0.1537

Calculate loading

lb/gallon = ^ weight (grams) x gr/75 ml x 1000 ml/liter x 3.875 lb/gallon x pounds/453.8 gram

lb/gallon = weight x 0.1139

lb/hour = lb/gallon x gallon/minute x 60 minutes/hr =

Scrubber inlet water

0.0277 x 0.1139 x 110 x 60 = 20.8 lb/hr

Scrubber drain water

0.1537 x 0.1139 x 110 x 60 = 115.5 lb/hr

Particulate mass to the scrubber from the process

pounds/hr scrubber drain + pounds/hr particulate emitted - pounds/hr particulate in inlet water

115.5 lb/hr + 0.31 lb.hr - 20.8 lb/hr = 95.01 lb/hr

ATTACHMENT C

Particulate removal efficiencies

No.3 Lime Slaker Scrubber

Removal efficiency is equal to:

$$\frac{\text{Mass in scrubber drain}}{\text{Mass to scrubber}} \times 100 =$$

$$\frac{94.7 \text{ lb/hr}}{95.01 \text{ lb/hr}} \times 100 =$$

99.7%

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: Bruce Mitchell

THRU: Clair Fancy

FROM: John Brown

DATE: September 8, 1989

SUBJ: Lime Slaker Permit @ Seminole Kraft

Based on my review of the attached August 30, 1989 letter from Seminole Kraft the following observations are made:

a) When Seminole Kraft negotiated a consent order to open the former Jacksonville Kraft facility there were several days of negotiation during which company representatives spent much time and effort in convincing the BESD, the Department and the EPA that they would be a good "Corporate Neighbor".

Since reopening they have failed eleven stack tests, the most recent in June 1989. BESD spent an inordinate period of time negotiating a settlement of $40,000 for the first nine test failures. Now we are back into enforcement against two additional stack test failures.

The 10-03-88 version of 17-4.070(5) states in part, "The Department shall take into consideration a permit applicant's violation of any department rules at any installation when determining whether the applicant has provided reasonable assurances that Department standards will be met".

The construction permit allegedly placed the burden on the facility to demonstrate compliance with RMS 5. Therefore, the facility should have designed and built the Slaker to meet that requirement. They still should be required to do so, in my opinion.

The test described in the attached letter was a compliance test and therefore the owner had a responsibility to notify the Department (BESD, in this case) of the test 15 days prior to testing. The Department was denied the opportunity to observe the test, thus rendering it unacceptable.

If it is impossible to test utilizing Method 5 ahead of the scrubber, the company needs to demonstrate through 17-2.700(3), ASP, that Compliance can be determined through equivalent methods. This is required prior to using the test method, not after the fact. There is no reason that we can think of that precludes the use of Method 5 for a wet stack.

17-2.700(3)(C) clearly spells out the requirements for test facilities that do not conduct a compliance test on at least an annual basis. It is apparent that this rule was not met. A good argument can be made for annual demonstration of 98% efficiency or at least establishment of surrogate parameters which will guarantee compliance on a continuous basis. I propose that you consider requiring the source to modify the configuration to allow for RMS 5 testing and that the efficiency be demonstrated annually.

Your consideration of the above comments is appreciated.

JB/cl

Attachment

cc: Steve Pace - BESD
Mont Benjamin - NE Dist. } 9-20-89
BT read the document

9/19

Bruce -
I agree with John, by in large, and with you and Bill on the fact that either the .03gr or the 98% must be clearly demonstrated. Please check with BESD on the ideal of back-to-back tests on the stack if parts really cannot be installed. I'll be out W-F this week. Please see me next Monday or Tuesday on this.

Alan

SPECIAL REPORT

NO.3 LIME SLAKER

WET SCRUBBER PERFORMANCE

Purpose

The test described in this report was conducted to demonstrate the efficiency of the wet scrubber on No.3 Lime SLaker.

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Recommendations

Based on this demonstration, DER should issue an operating permit for the No.3 Lime Slaker with the same conditions as were contained in the construction permit for this source. Specifically particulate matter emissions shall not exceed 3.2 lb/hr and 7 TPY. Visible emissions shall be limited to no more than the average opacity achieved during a compliance test, which establishes compliance with the standard, plus 5% opacity.

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PARTICULATE CONC.,lb/cu ft	1.5E-05	1.3E-05	1.5E-05	1.4E-05
MASS EMISSION RATE, lb/hr	0.34	0.28	0.33	0.31

* DATA CORRECTED TO SATUATION AT STACK TEMPERATURE

ATTACHMENT B

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Slaker Water Flow and Solids Loading

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Example calculation:

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Where: pipe diameter is in inches, velocity is in feet per second
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Water pipe feeding slaker scrubber is 4 inch schedule 40 stainless with an internal diameter of 4.03 inches.

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Average: 110 gpm

DATA

Solids analysis of scrubber water

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"	0_5	1330	75 ml	65.9570	66.0962	0.1392
"	0_6	1430	75 ml	68.9192	69.0614	0.1522
"	0_7	1530	75 ml	67.8210	67.9866	0.1655
"	0_8	1630	75 ml	70.1460	70.3210	0.1750

average inlet water Δ weight 0.0277
average scrubber drain Δ weight 0.1537

Calculate loading

lb/gallon = Δ weight (grams) x gr/75 ml x 1000 ml/liter x 3.875 lb/gallon x pounds/453.8 gram

lb/gallon = weight x 0.1139

lb/hour = lb/gallon x gallon/minute x 60 minutes/hr =

Scrubber inlet water

0.0277 x 0.1139 x 110 x 60 = 20.8 lb/hr

Scrubber drain water

0.1537 x 0.1139 x 110 x 60 = 115.5 lb/hr

Particulate mass to the scrubber from the process

pounds/hr scrubber drain + pounds/hr particulate emitted - pounds/hr particulate in inlet water

115.5 lb/hr + 0.31 lb.hr - 20.8 lb/hr = 95.01 lb/hr

ATTACHMENT C

Particulate removal efficiencies

No.3 Lime Slaker Scrubber

Removal efficiency is equal to:

$$\frac{\text{Mass in scrubber drain}}{\text{Mass to scrubber}} \times 100 =$$

$$\frac{94.7 \text{ lb/hr}}{95.01 \text{ lb/hr}} \times 100 =$$

99.7%

Seminole Kraft Mtg
8-31-89

Clair Fancy	FDER/DARM	904 488 1344
Bruce Mitchell	FDER/DARM	"
Teresa M. Heron	FDER/DARM	904 488-1344
Tony Cole	Seminole	904 877 0099
J.P. Subramani	Seminole	904 877-0099
Bert Swift	DER	904 488 9780
Mike Riddle	Seminole Kraft	904/751-6400 ext 279
Curt Barton	" "	~~904~~ 404 621-6700
D.A. Buff	KBN	904/375-8000
Bill Thomas	FDER/BAQM	(904) 488-1344

8-31-89 @ 2125
Pkg given to Jim Pennington

Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

RECEIVED
AUG 31 1989
DER - BAQM

August 30, 1989

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

Dear Mr. Fancy:

Attached is a report which summarizes the results of a special test conducted on the No.3 Lime Slaker to determine the removal efficiency of the wet scrubber. You will note the removal efficiency exceeds 98%. Under Rule 17-2.650(2)(c)12, FAC a source which has no specific RACT emission limitation is allowed to emit in excess of 0.03 gr/dscf if the control device has a collection efficiency of 98%.

Therefore, we believe, DER must issue an operating permit for this source which contains the same particulate emission limitations as originally provided in the construction permit for this source.

We look forward to meeting with you on August 31, 1989 to discuss this matter in more detail.

Sincerely,

Michael Riddle
Environmental Supervisor

ah

attachment

CC: C. Barton
T. Cole
J. Fowler
L. Stanley
James L. Manning
Ernest Frey
Ron Roberson

SPECIAL REPORT

NO.3 LIME SLAKER

WET SCRUBBER PERFORMANCE

Purpose

The test described in this report was conducted to demonstrate the efficiency of the wet scrubber on No.3 Lime SLaker.

Description of test

The integral design of the wet scrubber on the No.3 Lime Slaker does not allow a determination of the wet scrubber inlet particulate loading using EPA-RM5. There is no room to properly install ports for the test probe and inlet gas conditions (>212^{o}F supersaturated) would not allow the sampling methodology to work. Therefore, the method chosen to demonstrate the scrubber efficiency was a mass balance approach.

The water flow into the scrubber was determined. The particulate concentration was determined on both the inlet to the scrubber and drain from the scrubber. A particulate mass rate was then determined for both the inlet water flow and the scrubber drain. Finally, the particulate mass loading to the scrubber was the difference between the mass input in the fresh water and the mass discharged through the drain.

The water flow into the scrubber was used for both inlet and outlet flows in the scrubber. This was a conservative approach because the volume of water emitted through the scrubber vent should be less than the volume of water condensed in the scrubber from the slaking process. This would make the scrubber discharge volume used in the calculations lower than the actual discharge volume and therefore makes the calculated mass loading to the scrubber lower than the actual mass loading. We also believe that the amount of water condensed in the scrubber and discharged through the stack are very minor when compared to the flow of fresh water to the scrubber.

Result of test

The results of the stack test on the No.3 Lime Slaker are shown on Attachment A. The average particulate emissions were 0.31 lb/hr.

The results from testing the scrubber water (in and out) are shown on Attachment B. The wet scrubber inlet particulate

loading calculations are shown on Attachment B. The wet scrubber inlet particulate loading was 95.01 lb/hr.

The particulate removal efficiency of the wet scrubber is calculated on Attachment C. The particulate removal efficiency was 99.7%.

Conclusion

This test demonstrates that the wet scrubber on the No.3 Lime Slaker has an efficiency exceeding 98%. Under rule 17-2.650(2)(c)12, FAC, a source which has no specific RACT emission limitations is allowed to emit in excess of 0.03 gr/dscf if the control device has a collection efficiency of 98%.

Recommendations

Based on this demonstration, DER should issue an operating permit for the No.3 Lime Slaker with the same conditions as were contained in the construction permit for this source. Specifically particulate matter emissions shall not exceed 3.2 lb/hr and 7 TPY. Visible emissions shall be limited to no more than the average opacity achieved during a compliance test, which establishes compliance with the standard, plus 5% opacity.

ATTACHMENT A

SEMINOLE KRAFT PARTICULATE CALCULATIONS

SOURCE : SLAKER No. 3 DATE: 8-16-89

INPUT DATA

	RUN 1	RUN 2	RUN 3	AVG.
TIME STARTED	1126	1255	1437	
TIME FINISHED	1230	1421	1548	
BAROMETRIC PRESSURE,in Hg	30.07	30.07	30.07	30.07
METER CORRECTION FACTOR	1.04	1.04	1.04	1.04
METER VOLUME, cu ft	48.480	49.070	50.954	49.501
AVG DELTA-H, in water	2.03	1.89	2.03	1.98
AVG METER TEMP, deg F	117	121	123	120
VOL. LIQUID COLLECTED,ml *	240	293	286	273
SILICA GEL WEIGHT CHANGE,g	12.7	14.9	19.2	15.6
CARBON DIOXIDE CONTENT,%	0.0	0.0	0.0	0.0
OXYGEN CONTENT,%	20.0	20.0	20.5	20.2
NITROGEN CONTENT,%	80.0	80.0	79.5	79.8
AVG SRT DELTA-P,in water	0.19	0.18	0.19	0.18
AVG STACK TEMP,deg F	139	144	142	142
AVG STACK PRES., in Hg	30.07	30.07	30.07	30.07
STACK AREA, sq ft	0.785	0.785	0.785	0.79
NET RUN TIME, hrs	1.0	1.0	1.0	1.0
NOZZLE SIZE, in	0.55	0.55	0.55	0.550
PARTICULATE WEIGHT, g	0.3089	0.2762	0.3263	0.3038

CALCULATED DATA

	RUN 1	RUN 2	RUN 3	AVG.
VOL METER, SDCF	46.606	46.833	48.480	47.307
VOL CONDENSATE, SDCF *	11.910	14.511	14.384	13.602
GAS MOISTURE CONTENT,% *	20.4	23.7	22.9	22.3
DRY GAS MOLECULAR WT.	28.80	28.80	28.82	28.81
STACK GAS MOLECULAR WT.	26.60	26.25	26.34	26.40
GAS VELOCITY, FPS	11.56	11.18	11.58	11.44
GAS FLOW RATE, ACFM	544	527	545	539
GAS FLOW RATE, SDCFM	384	353	371	369
GAS FLOW RATE, SDCFH	23047	21196	22248	22164
ISOKENETIC RATE, %	96.3	105.2	103.7	101.7
PARTICULATE CONC, gr/cu ft	0.1023	0.0910	0.1039	0.0990
PARTICULATE CONC.,lb/cu ft	1.5E-05	1.3E-05	1.5E-05	1.4E-05
MASS EMISSION RATE, lb/hr	0.34	0.28	0.33	0.31

* DATA CORRECTED TO SATUATION AT STACK TEMPERATURE

ATTACHMENT B

Field Data
Slaker Water Flow and Solids Loading

The water flow to the slaker was measured using a portable doppler flow meter. This meter reads water velocity in the pipe. Volumetric flow is calculated from pipe diameter and a conversion factor.

Example calculation:

$$\text{gallons per minute} = (\text{pipe diameter})^2 \times (\text{velocity}) \times 2.45$$

Where: pipe diameter is in inches, velocity is in feet per second
2.45 is a conversion factor.

Water pipe feeding slaker scrubber is 4 inch schedule 40 stainless with an internal diameter of 4.03 inches.

DATA

Date	Time	Velocity	Flow
8/16/89	1100	3.0	119
8/16/89	1200	2.95	117
8/16/89	1300	2.95	117
8/16/89	1400	2.6	103
8/16/89	1500	2.6	103
8/16/89	1600	2.5	100

Average: 110 gpm

DATA

Solids analysis of scrubber water

Sample ID	Sample No.	Time	Sample Size	Beaker tare	Beaker w/sample	Δ Weight
inlet water	In_1	930	75 ml	47.9110	47.9328	0.0217
inlet water	In_2	1630	75 ml	57.7679	57.8013	0.0336
scrubber	0_1	930	75 ml	60.2748	60.4213	0.1466
drain	0_2	1030	75 ml	57.7780	57.9006	0.1226
"	0_3	1130	75 ml	66.1722	66.3269	0.1546
"	0_4	1230	75 ml	65.7772	65.9511	0.1740
"	0_5	1330	75 ml	65.9570	66.0962	0.1392
"	0_6	1430	75 ml	68.9192	69.0614	0.1522
"	0_7	1530	75 ml	67.8210	67.9866	0.1655
"	0_8	1630	75 ml	70.1460	70.3210	0.1750

average inlet water Δ weight 0.0277
average scrubber drain Δ weight 0.1537

Calculate loading

lb/gallon = ^ weight (grams) x gr/75 ml x 1000 ml/liter x 3.875 lb/gallon x pounds/453.8 gram

lb/gallon = weight x 0.1139

lb/hour = lb/gallon x gallon/minute x 60 minutes/hr =

Scrubber inlet water

0.0277 x 0.1139 x 110 x 60 = 20.8 lb/hr

Scrubber drain water

0.1537 x 0.1139 x 110 x 60 = 115.5 lb/hr

Particulate mass to the scrubber from the process

pounds/hr scrubber drain + pounds/hr particulate emitted - pounds/hr particulate in inlet water

115.5 lb/hr + 0.31 lb.hr - 20.8 lb/hr = 95.01 lb/hr

ATTACHMENT C

Particulate removal efficiencies

No.3 Lime Slaker Scrubber

Removal efficiency is equal to:

$$\frac{\text{Mass in scrubber drain}}{\text{Mass to scrubber}} \times 100 =$$

$$\frac{94.7 \text{ lb/hr}}{95.01 \text{ lb/hr}} \times 100 =$$

99.7%

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

ATTORNEYS AT LAW

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

August 28, 1989

RECEIVED
AUG 28 1989
DER-BAQM

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

Re: Meeting to Discuss Seminole Kraft Corporation's Lime Slaker Operation Permit Conditions and the New Recovery Boiler and Smelt Dissolving Tank Permit Application

Dear Mr. Fancy:

As per our conversation last week, this letter is to confirm the meeting between representatives of Seminole Kraft Corporation and you in your office at 1:00 p.m. on Thursday, August 31 to discuss the above referenced items. Messrs. Curt Barton, Mike Riddle, David Buff, Terry Cole and the undersigned will attend the meeting on behalf of Seminole Kraft Corporation.

Sincerely,

J. P. Subramani

JPS/dg /1003

xc: Curt Barton

8/30
Bruce —
Looks ~~es~~ through Betsy
needs to be done
Clair

9-30-89
@ 9:14
Left a return call for Betsy.
RR

OGC Rec'd Aug 11, 1989

Rec'd 9-27-89 DAR

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Dept. of Environmental Reg.
Office of General Counsel

SEMINOLE KRAFT CORPORATION,

Petitioner,

vs.

DEPARTMENT OF ENVIRONMENTAL REGULATION,

Respondent.

OGC CASE NO.: 89-0022
OPERATING PERMIT NO.: AO16-155275
CASE NO:

OGC
Bill Conlin
Rm 672

PETITION FOR FORMAL ADMINISTRATIVE PROCEEDINGS
UNDER SECTION 120.57(1), FLORIDA STATUTES

Petitioner, SEMINOLE KRAFT CORPORATION, hereby petitions for Formal Administrative Proceedings pursuant to Section 120.57(1), Florida Statutes and requests that this Petition be forwarded to the Division of Administrative Hearings for formal proceedings under Section 120.57(1), F.S.

1. The affected agency is the State of Florida Department of Environmental Regulation ("DER"), located at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. The Petition involves an operating permit, issued on December 20, 1988, for Seminole Kraft Corporation's No. 3 Lime Slaker at 9469 Eastport Road, Jacksonville, Florida.

2. Petitioner's address is Post Office Box 26998, Jacksonville, Florida 32218. The Petitioner's substantial interests are affected by the operating permit as follows:

(a) In January, 1988, the Petitioner submitted an application to DER for a construction permit to install a new

lime slaker and pollution control equipment at its Jacksonville mill. The new Number 3 slaker replaced two old slakers.

(b) The No. 3 Lime Slaker is subject to the emission limitations set out in DER Rule 17-2.650(2)(c)12, F.A.C. which in general prohibits emissions of particulate matter in excess of 0.03 gr/dscf, but allows this limitation to be exceeded if the pollution control device or system used "has an actual particulate matter collection efficiency of at least 98 percent."

(c) The Petitioner's application for the construction permit specifically indicated that particulate emissions would be controlled by a Goslin 36" positive draft 304L stainless steel scrubber (Attachment A to application). Furthermore, the Petitioner's application provided justification and documentation that the Goslin 36" positive draft scrubber would exceed 98% removal of particulate matter and proposed a RACT emission limit of 3.2 lbs/hour based on 99% efficiency. (Attachment F to application).

(d) After evaluating all of the information submitted with the construction permit application and ascertaining pursuant to DER Rule 17-4.070, F.A.C. that Petitioner had provided reasonable assurance the proposed RACT limitation of 3.2 lbs/hour would comply with DER Rule 17-2.650(2)(c)12, F.A.C., DER issued the construction permit to Petitioner. The information and details of the scrubber design submitted with the application clearly indicated to DER that the particulate loading from the scrubber outlet would exceed the 0.03 gr/dscf limitations of Rule 17-2.650(2)(c) 12, F.A.C., but that the collection efficiency of

the proposed Goslin scrubber would exceed the 98% removal level. Based on this evaluation, DER did not specify the grain loading or the percentage removal requirement in its construction permit. Instead it specified the particulate mass emission limitation that was proposed by the Petitioner.

(e) Specific Condition Number 5 of the construction permit provides:

> 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 emission shall be limited to no more than the average opacity 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, Appendix A and F.A.C. Rule 17-2.700.

(f) Additionally, Specific Condition Number 9 of the construction permit provides:

> To obtain a permit to operate, [emphasis added], the applicant must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee along with test results and Certificate of Completion, to the Duval County Department of Health, Welfare & Bio-Environmental Services (BESD) office 90 days prior to expiration date of the construction permit.

(g) Furthermore, DER Rule 17-2.500(6), Construction/Operating Requirements provides:

> (a) Construction Permits.
> Any construction permit issued pursuant to this section shall contain all of the conditions and provisions necessary to insure that the construction and operation of the facility or modification shall be in

accordance with the requirements of this section.

(b) Operating Permits.
Any operating permit issued for a facility or modification shall include all operating conditions and provisions required under subsection (6)(a), above, and set forth in the original or amended construction permit. Any operating permit issued may include additional provisions, authorized by rule, which are not in conflict with any of the conditions or provisions required by the construction permit.

(h) On August 31, 1988, Petitioner submitted an application for an operating permit for the No. 3 Lime Slaker. Information included in this application demonstrated compliance with the emission limitations of the construction permit.

(i) Notwithstanding Specific Condition Number 9 of the construction permit, Rule 17-2.500(6), F.A.C., and Petitioner's compliance with the limitations imposed in Specific Condition Number 5 of the Construction Permit. DER, without justification, issued an operating permit on December 20, 1988, that imposed particulate emission limits of 0.22 lbs/hr. These limits are far more restrictive than those in the construction permit.

(j) On May 1, 1989 and again on July 14, 1989, Petitioner sent letters to DER objecting to the more stringent limitations. In response to Petitioner's July 14, 1989 letter, the Bio-Environmental Services Division of the Duval County Department of Health Welfare and Bio-Environmental Services ("BESD") sent a letter to DER on July 31, 1989 supporting DER's operating permit. BESD did not, however, file a petition for administrative proceedings to challenge the air emission

limitations in the construction permit, even though DER provided BESD with its notice of intent to issue the construction permit which specifically advised persons affected by the permit of their right to file such a petition.

(k) Accordingly, since Petitioner relied on the conditions of the construction permit issued by DER and purchased and installed the Goslin 36" scrubber which performs much better than the 3.2 lbs/hour emission limit of the construction permit but will at times exceed the proposed emission limits of the operating permit, the substantial interests of Petitioner are adversely affected by the DER operating permit.

3. Even though the particulate emission limitations of the operating permit are far more restrictive than those of the construction permit, DER did not notify the Petitioner of its intent to impose the more restrictive limitations. Rather, it mailed a Notice of Permit to the Petitioner on December 20, 1988. The date for filing a Petition for an administrative hearing was extended through several Motions with concurrence of Counsel and most recently by Order of DER until August 16, 1989.

4. The disputed issues of material fact are:

(a) Whether Petitioner's emissions comply with the emission limits established by the Construction Permit;

(b) Whether DER had the authority to impose particulate emission limitations in the operating permit that are more restrictive than those in the construction permit.

(c) Whether DER and BESD are estopped from issuing a more restrictive operating permit which was relied upon to its

detriment by Petitioner by constructing a new scrubber to meet the requirements of the construction permit.

5. The following is a statement of the ultimate facts alleged that entitle Petitioner to relief:

(a) Petitioner owns and operates the No. 3 Lime Slaker at its Jacksonville mill. The air emission control devices installed on the Number 3 Lime Slaker to control particulate emissions were done so pursuant to a construction permit issued by DER. Particulate emissions from this facility comply with the 3.2 lbs/hr limitation set forth in the construction permit. Therefore, Petitioner is entitled to be issued an operating permit requiring it to meet the same particulate emission standards set forth in the construction permit.

6. Petitioner requests that DER forward this petition to the Division of Administrative Hearings for a determination of the matters raised in this Petition, that the Hearing Officer issue a Recommended Order finding that the air emission control devices installed by Petitioner at its No. 3 Lime Slaker meet applicable DER rules, that DER did not have authority to impose more restrictive particulate emission standards in the operating permit, and that a Final Order be issued requiring the issuance of a operating permit with the same particulate emission standards as those in the construction permit.

7. Attached is a copy of the permit applications for the construction and operating permits, the construction and operating permits, the Notice of Permit for the operating permit, comments of Petitioner to DER regarding the operating permit, and

the Order issued by the DER Secretary granting an Extension of Time until August 16, 1989 to file a Petition for Formal Administrative Proceedings.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand-delivery to the **FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION AGENCY CLERK, MR. GARY SMALLRIDGE, Attorney at Law, and MR. BILL CONGDON, Attorney at Law, Office of General Counsel, Assistant General Counsel, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400** on this 11th day of August, 1989.

OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.
Post Office Box 6507
Tallahassee, Florida 32301
(904) 877-0099

Tom Tomasello

TERRY COLE
TOM TOMASELLO

Attorneys for Petitioner
SEMINOLE KRAFT CORPORATION

PM
7-28-89
Fax, FL

File Copy

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

July 31, 1989

Mr. C. H. Fancy, P.E.
Deputy Director
Division of Air Resources Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Seminole Kraft Corporation No. 3 Lime Slaker (A016-155275)

Dear Mr. Fancy:

Bio-Environmental Services Division (BESD) has received a copy of Mr. T. Cole's correspondence dated July 14, 1989, regarding the subject item. BESD has reconsidered the issues, and recommends against the revision of the emission limit.

Section 17-2.650(2)(c)12.6., Florida Administrative Code (FAC), states clearly that particulate matter (PM) emissions in excess of 0.03 gr/dscf is permissible with a control device that has a minimum efficiency of 98 percent. If Seminole Kraft Corporation demonstrates that the control device is capable of achieving 98 percent efficiency, then BESD shall revise the operating permit issued December 20, 1988 (Permit No. A016-155275) to allow PM emissions of 3.2 pounds per hour and 7.0 tons per year. If the control device fails to achieve 98 percent efficiency, then the allowable emission rate shall be 0.03 gr/dscf.

BESD recommends that the Department require Seminole Kraft Corporation to demonstrate the efficiency of the control device to resolve this matter.

Please contact the undersigned if any additional information is required.

Very truly yours,

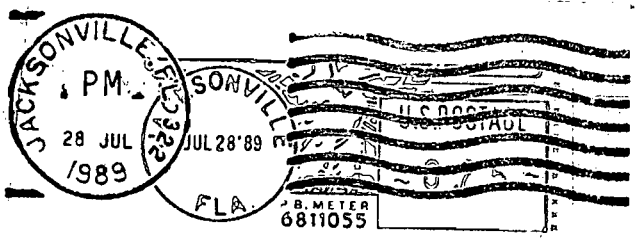
Ronald L. Roberson

Ronald L. Roberson
Associate Engineer

RLR/bgm

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

Disc: RLR 1, 3
CHF/BT/PA
Teresa/Bruce } 8-1-89
J.P. Subramani 8-2-89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28 JUL
1989
JACKSONVILLE
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P.B. METER
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OF COUNSEL

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

July 14, 1989

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DER-BAQM

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

Re: Seminole Kraft Corporation
Number 3 Lime Slaker; AO 16-155275

Dear Mr. Fancy:

This is in response to your June 14, letter to Mr. Stanley of Seminole Kraft Corporation (Seminole) concerning the Department's recent new position on the applicable particulate emission limitation for the No. 3 Lime Slaker Scrubber, pursuant to F.A.C. Rule 17-2.650(2)(c)12.

The Department's current position deviates without cause and justification, significantly from the RACT limitation originally accepted by the Department and specified in the construction permit AC 16-144791. It also deviates from the department's policy of incorporating the construction permit requirements into the subsequent operation permit when the construction permit requirements are met or surpassed.

When it applied for the construction permit, Seminole provided justification and documentation for the proposed RACT limitation of 3.2 lbs/hour based on better than 98% removal of particulate matter by the proposed Goslin 36" positive draft scrubber. Seminole also provided the Department with design features of the scrubber showing that it would be constructed as an integral part of the slaker with a 35" flange for connection to slaking compartment and without a porthole for inlet sample collection. The volumetric gas flow to the scrubber was also provided at an estimated 600 acfm.

7/17

Bruce -

please see me on this sometime this week. It seems as though someone is confused (besides me).

Clair

7-21-89
@ 9:20 - :45 Spoke @ Teresa about the sampling issues.
@ 9:55-10:05
Spoke @ Jim Pennington on Method 2 about isokinetic sampling.
@ 10:08 - :20
Spoke @ Teresa on scrubber design, flanges (connections).

7-14

Clair -

I gave Bruce a copy Patty

After evaluating all of the submitted information and ascertaining pursuant to F.A.C. Rule 17-4.070 that Seminole had in fact provided reasonable assurance the proposed RACT limitation of 3.2 lbs/hour would comply with Department Rule 17-2.650(2)(c)12, F.A.C., the Department issued the construction permit to Seminole. The information and details of the scrubber design submitted clearly indicated to the Department that the particulate loading from the scrubber outlet would exceed the 0.03 grains/dscf, and that the collection efficiency of the proposed system would exceed the 98% removal. Based on this evaluation, the Department did not see the need to specify the grain loading or the percentage removal requirement but specify only the particulate mass emission limit for demonstrating compliance.

Specific Condition Number 5 of the construction permit states as follows:

> 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 emission shall be limited to no more than the average opacity 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, Appendix A and F.A.C. Rule 17-2.700.

Additionally, specific Condition Number 9 of the construction permit states as follows:

> To obtain a permit to operate, [emphasis added], the applicant must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee along with test results and Certificate of Completion, to the Duval County Department of Health, Welfare & Bio-Environmental Services (BESD) office 90 days prior to expiration date of the construction permit.

It should be clearly pointed out that BESD had every opportunity to and did, in fact, review the above referenced conditions of the proposed construction permit prior to issuance of the construction permit. In addition the permit was noticed and BESD did not file a Petition for Hearing and waived its right to object to the permit. It now is attempting to rewrite the construction permit in a manner that the source cannot meet. The time to resolve this type of issue is when the construction permit is being reviewed, not after the source and scrubber have been constructed and operating.

Based on the provisions of the construction permit, Seminole spent the monies and installed the scrubber which performs much better than the 3.2 lbs/hour emission limit. Additionally, Seminole has satisfactorily met all the conditions established for obtaining an operation permit. To now take a position that Seminole should either make modifications to or abandon the one year old scrubber because 0.03 grains/dscf is being exceeded is without merit or cause.

In view of the above, we request that the Department reconsider its position and revise the emission limit in the operation permit to be consistent with that of the construction permit. We would like to meet with you and the Department staff to further discuss this matter.

Thank you very much for your assistance in clearing up this matter.

Sincerely,

Terry Cole
Terry Cole

TC:slw

cc: James Manning, BESD
Ernest Frey, DER, N.E. Dist.
B. Stewart, DER, N.E. Dist.
L. A. Stanley, Seminole Kraft
Curt Barton, Seminole Kraft
Mike Riddle, Seminole Kraft
John Millican

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
General Manager
Seminole Kraft Corp.
9469 Eastport Rd.
Jacksonville, FL 32218-0998

4. Article Number
P 938 762 590

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 — Address
X

6. Signature — Agent
X

7. Date of Delivery

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

JUN 16 1989

PS Form **3811**, Mar. 1988 ★ U.S.G.P.O. 1988-212-865 **DOMESTIC RETURN RECEIPT**

P 938 762 590

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

Sent to Mr. L. A. Stanley, Seminole Kraft	
Street and No. 9469 Eastport Rd.	
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: 6-14-89	

PS Form 3800, June 1985

File Copy

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

June 14, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Stanley:

Re: No. 3 Lime Slaker

The Department is in receipt of your correspondence dated May 1 and 5, 1989, pertaining to the operation permit (AO 16-155275) issued for the above referenced air pollution source. Based on a review of the correspondence and discussions with the BESD (Duval County's Bio-Environmental Services Division), the Department is in agreement with the BESD, meaning that in order to be entitled to a provision of the rule where an efficiency is a prerequisite, this efficiency must be demonstrated. Please note that condition No. 5 is based on Rule 17-2.650(2)(c)12. This requires the efficiency of at least 98% to be demonstrated.

Therefore, the mill shall demonstrate the efficiency of the No. 3 Lime Slaker's scrubber control system through testing. Using EPA Reference Method 5, pursuant to 40 CFR 60, Appendix A, and F.A.C. Rule 17-2.700, the inlet and outlet gas streams shall be sampled and the results compared to establish the source's control efficiency. Notification of compliance testing shall be submitted in writing to the BESD at least 15 days prior to testing. The test results shall be submitted to the BESD no later than 45 days after completion of the last test run.

The test results shall be evaluated by the BESD. Based on the test results, the BESD shall impose the appropriate emission limiting standard(s) pursuant to F.A.C. Rule 17-2.650(2)(c)12.

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

Sincerely,

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

CHF/BM/s

cc: R. Roberson, BESD
B. Stewart, NE District
B. Hewitt, Esq., DER
B. Mitchell/S. Huron

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-144791
Expiration Date: December 1, 1988

SPECIFIC CONDITIONS:

5. 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 5% opacity, 6 minute average. Compliance tests for PM shall be demonstrated using EPA Methods 1, 2, 3, 5, and 9, in accordance with 40 CFR 60, Appendix 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.

6. Visible emissions and particulate emissions tests shall run concurrently.

7. A pressure meter rubber system for the lime slaker to supply pressure. The pressure sensor e to the scrubber liquid discharge po s to be certified by the manufacturer percent of design scrubbing liquid su

The 3.2 lbs/hr and 7 TPY numbers are based on the applicant's calculations using AP-42 emission factors and "99%" efficiency of the scrubber. The TE+PD did point out the E of the sys. to be 98%.

8. The lime slaker ons of FAC Rule 17-2.250, Excess Emi

9. The construction o the plans and schedule submitted he applicant is unable to complete must notify the Department in writi piration of the construction permit d request for an extension of the con 4.09).

To obtain a permit to operate, the applicant must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Duval County Department of Health, Welfare & Bio-Environmental Services (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. Operation beyond the construction permit expiration date requires a valid permit to operate (FAC Rules 17-4.22 and 17-4.23).

(iii) An owner or operator may request the Department to determine that the emission standards of 17-2.650(2)(c)11.b.(i) and (ii) do not constitute RACT for a facility. If the Department finds that the emission standards do not represent RACT, the Department shall make a determination of RACT for that facility.

12. Miscellaneous Manufacturing Process Operations.

a. Applicability - The emission limitations and other requirements of 17-2.650(2)(c)12. shall apply to miscellaneous manufacturing process operations for which a specific RACT emission limitation has not been established in 17-2.600 or 17-2.650(2)(c)1. through 11., including but not limited to such operations as heat treating furnaces, waste heat evaporators, corebaking ovens, mixing kettles, blast furnaces, puddling furnaces, driers, stills, roasters, and all other methods or forms of manufacturing or processing which emit particulate matter.

b. Emission Limitations - No owner or operator of a miscellaneous manufacturing process operation shall cause, permit, or allow emissions of particulate matter in excess of 0.03 gr/dscf, or any visible emissions (greater than 5 percent opacity). However the owner or operator may exceed these emission limits if he utilizes a pollution control device or system for control of particulate matter which has an actual particulate matter collection efficiency of at least 98 percent.

If 17-2.650(2)(c)12. is the least restrictive standard, the opacity standard for the source shall be the average opacity level achieved during the initial compliance test which establishes compliance with the standard, plus 5 percent opacity.

(d) Maximum Allowable Emission Rates

1. Source Data. The new or revised operating permit for each source subject to the provisions of this section shall specify:

a. The maximum heat input rate, charging rate, production rate, through-put rate, and/or materials handling rate, as appropriate;

The maximum heat input rate, charging rate, production rate, throughput rate, or materials handling rate shall be the maximum rate at which the source is capable of being operated on a continuous basis.

b. The maximum dry standard volumetric flow rate for each emission point, when applicable:

The maximum dry standard volumetric flow rate for each source or component source operation shall be the minimum dry standard volumetric flow rate that is necessary to safely and properly vent or operate the source when it is operated at its maximum continuous operating rate.

c. The control device through which each gas stream is vented and the emision point from which each gas stream is discharged to the open air;

d. The height above ground, exit diameter, UTM coordinates, and nature of each emission point through which particulate is or may be vented;

e. The exit gas temperature, actual volumetric flow rate and moisture content of each particulate bearing gas stream that is or may be vented to the open air;

f. Pertinent operating or control equipment parameters, such as pH of scrubber solution, presure drop in scrubber, pressure on spray nozzle, etc, when such information is needed to confirm the control device is operating normally;

g. The permitted operating schedule, (hrs./day, days/wk., wk./yr.)

2. Maximum Emission Rates. The new or revised operating permit for each source shall specify the maximum allowable emission rate for each source or group of commonly vented sources in accordance with the following provisions:

a. The maximum allowable emission rate expressed in lbs/hr, lbs/day and tons/yr (or other equivalent units) shall be determined for each source (for example, each drop transfer point, screening operation, kiln, or drier) by applying the appropriate emission limitation contained in 17-2.600 or 17-2.650(2)(c) to the maximum applicable source operation rate or dry standrd volumetric flow rate and the permitted operating operating schedule as specified in the operating permit pursuant to the provisions of 17-2.650(2)(d)1.

b. If several sources are vented through a common control device or emission point, the maximum allowable emission rate for the common emission point shall be the sum of the individual maximum allowable emission rates for each source vented by tht emission point.

c. The owner or operator of a source or a group of sources that is subject to an emission limitation set forth in 17-2.650(2)(c) and that is the Department, prorate the total allowable emission for such sources among all emission points that vent the affected source such that a specific maximum allowable emission rate is assigned to each emission point.

The operating permits for sources shall be revised in accordance with 17-2.650(2)(d) to reflect the maximum allowable emission rates for each emission point.

d. The operating permit shall specify whether compliance shall be determined by measuring the emisions vented from each individual source or by measuring the emissions from the common emission point. In determining whether compliance shall be determined for each source individually or for a group of commonly vented sources at the common emission point, the Department shall consider the following factors:

(i) If all sources that are ventend through a common emission point are subject to the same type of emision limiting standard (i.e., gr/dscf) and are all part of the same system of unit operations such that when one source is in operation the other sources will also normally be in operation, the Department may specify that compliance be determined at the common point of emission to the open air.

(ii) If the various sources that are vented through a common emission point are parts of different operating systems or are subject to different types of emission limiting standards (i.e., gr/dscf. lbs/ton of feed, lbs/MMBTU, percent opacity, etc. the Department may specify that compliance with the various emission standards be determined separately for each source operation.

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

FAX TRANSMITTAL LETTER

TO:

NAME: Ron Roberson / Darrell Hall

AGENCY: BESD (Duval County)

TELEPHONE NUMBER: (904)630-3666 FAX: 630-3638

NUMBER OF PAGES (INCLUDING COVER SHEET): 3

FROM:

NAME: R. Bruce Mitchell

AGENCY: DER/DARM/BAQM/CAPs

TRANSMITTAL ON A Hitachi HIFAX, PHONE NUMBER 904-488-6579 or SUNCOM 278-6579

IF ANY OF THE PAGES ARE NOT CLEARLY RECEIVED, PLEASE CALL IMMEDIATELY.

SENDERS NAME: R Bruce Mitchell

COMMENTS:

draft letter to Seminole kraft Corps on the No. 3 Lime Slaker

6-5-89
sent @ 1:44 p.m. RBM

6-6-89
Spoke @ Ron Roberson. Ok on the draft letter. @ 2:20 p.m. RBM

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

May 22, 1989

Mr. Clair H. Fancy, P.E.
Project Manager
Division of Air Resources Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Seminole Kraft Corporation - No. 3 Lime Slaker

Dear Mr. Fancy:

Bio-Environmental Services Division (BESD) has received copies of Seminole Kraft Corporation (SKC) correspondence dated May 1 and 5, 1989 pertaining to the the operation permit (AO16-155275) issued for the No. 3 Lime Slaker. SKC's letter requests your assistance in revising the allowable emission limits for particulate matter of the operating permit.

BESD in this instance deviated from normal permitting practices for reasons which are of a most significant nature. The construction permit (AC16-144791) cited Rule 17-2.650(2)(c)12.b. FAC. which allows the owner or operator to exceed 0.03 gr/DSCF or 5 percent opacity if a control device is utilized with a minimum efficiency of 98 percent. It is the minimum of 98 percent efficiency which has caused BESD to deviate from the construction permit limits.

SKC submitted a particulate matter test in accordance with the conditions of their permit. The emission rate reported was 0.08 lbs/hr with a concentration of 0.0338 gr/DSCF. The allowable emission limit in the construction permit is 3.2 lbs/hr and 7 tons/yr.

The control device for the No. 3 Lime Slaker is a spray scrubber. The typical particulate removal efficiency for this type control device is 90-95 percent. SKC has not demonstrated that this control device is capable of achieving a minimum of 98 percent particulate removal efficiency. If the control device is not a minimum of 98 percent efficient, then the allowable emissions limit is 0.03 gr/DSCF. Results of the compliance test failed to meet this limit. As a result, the unit did not demonstrate compliance and the request for an operating permit could have been denied. However, the compliance test demonstrated that the unit's actual emissions would be less than one (1) ton per year. Therefore, exemption from RACT Rules, Section 17-2.650(2)(b)3., would be applicable.

BESD submits the following options by which a resolution to the request may be derived:

1. SKC should demonstrate through testing the efficiency of the scrubber. Inlet and outlet sampling employing EPA Reference Method 5. If an efficiency of 98 percent or greater is achieved, then the allowable emissions limit of the construction permit are valid and BESD will revise the operating permit issued.

2. Demonstrate compliance with 0.03 gr/DSCF and BESD will revise the operating permit from RACT exempt to the rule applicable.

3. SKC may accept the RACT exemption as cited in the operating permit.

BESD has not received a notice that a petition for an administrative hearing has been filed by SKC nor a notice for an extension of time to file a petition. Permit No. AO16-155275 was issued December 20, 1988. BESD had assumed that the terms of this permit were acceptable to SKC since no action had been taken during the time period designated for such action. BESD offers its cooperation to expedite a resolution in this matter.

Please contact the undersigned if additional information is required.

Very truly yours,

Ronald L Roberson

Ronald L. Roberson
Associate Engineer

RLR/rlj

cc: Mr. Bill Stewart, P.E., DER
BESD Air Permitting File
BESD File 2155-EE
(Disc: 1/30)

Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

May 5, 1989

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

Subject: **Letter on Lime Slaker Operation Permit dated May 1, 1989**

Dear Mr. Fancy:

In the above referenced letter we included the wrong attachment. This letter provides the attachments referenced in that letter.

We apologize for any inconvenience this may have caused you and thank you for your consideration in this matter.

Sincerely,

L.A. Stanley/ah

L.A. Stanley
General Manager

ah

attachments

CC: James Manning, BESD
Ron Roberson, BESD
Ernest Frey, DER
Curt Barton
Terry Cole
John Millican
Mike Riddle

DEC 2 7 1988

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

NOTICE OF PERMIT

Mr. T. Frank Lee
General Manager
Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, FL 32218

Dear Mr. Lee:

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

Enclosed is Permit Number AO16-155275, dated Dec, 20, 1988, to operate the subject air pollution source, issued pursuant to Section 403.087, Florida Statutes (F.S.).

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, F.S., to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5.201, Florida Administrative Code (FAC), and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, F.S.. This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, FAC. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Mr. T. Frank Lee
Seminole Kraft Corporation
No. 3 Lime Slaker
Permit No. AO16-155275

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Ernest E. Frey
Deputy Assistant Secretary

EEF:rrk

Copies furnished to:

John T. McKinnon, P.E.
Jacksonville BES

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 12/20/88 to the listed persons.

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

Clerk 12/20/88
Date

RULES OF THE ADMINISTRATION COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTEREST

PART II
FORMAL PROCEEDINGS

28-5.201 Initiation of Formal Proceedings.

(1) Initiation of formal proceedings shall be made by petition to the agency responsible for rendering final agency action. The term petition as used herein includes any application or other document which expresses a request for formal proceedings. Each petition should 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 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, and an explanation of how his/her substantial interests will be affected by the agency determination;

(c) A statement of when and how petitioner received notice of the agency decision or intent to render a decision;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, as the rules and statutes which entitle the petitioner to relief;

(f) A demand for relief to which the petitioner deems himself entitled; and

(g) Other information which the petition contends is material.

*****

A petition may be denied if the petitioner does not state adequately a material factual allegation, such as substantial interest in the agency determination, or if the petition is untimely. (Section 28-5.201(3)(a), FAC)

17-103.155 Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.

(1)(a) Any person whose substantial interests may be affected by proposed or final agency action may file a petition for administrative proceeding. A petition shall be in the form required by this Chapter and Chapter 28-5, FAC, and shall be filed (received) in the Office of General Counsel of the Department within fourteen (14) days of receipt of notice of proposed agency action or within fourteen (14) days of receipt of notice of agency action whenever there is no public notice of proposed agency action. In addition to the requirements of Rule 28-5.201, FAC, the Petition must specify the county in which the project is or will be located.

(b) Failure to file a petition within fourteen (14) days of receipt of notice of agency action or fourteen (14) days of receipt of notice of proposed agency action, whichever notice first occurs, shall constitute a waiver of any right to request an administrative proceeding under Chapter 120, F.S.

(c) When there has been no publication of notice of agency action or notice of proposed agency action as prescribed in Rule 17-103.150, FAC, a person who has actual knowledge of the agency action or has knowledge which would lead a reasonable person to conclude that the Department has taken final agency action, has a duty to make further inquiry within fourteen (14) days of obtaining such knowledge by contacting the Department to ascertain whether action has occurred. The Department shall upon receipt of such an inquiry, if agency action has occurred, promptly provide the person with notice as prescribed by Rule 17-103.150, FAC. Failure of the person to make inquiry with the Department within fourteen (14) days after obtaining such knowledge may estop the person from obtaining an administrative proceeding on the agency action.

(2)(a) "Receipt of notice of agency action" means receipt of written notice of final agency action, as prescribed by Department rule, or the publication, pursuant to Department rule, of notice of final agency action, whichever first occurs.

(b) "Receipt of notice of proposed agency action" means receipt of written notice (such as a letter of intent) that the Department proposes to take certain action, or the publication pursuant to Department rule of notice of proposed agency action, whichever first occurs.

(3) Notwithstanding any other provision in this Chapter, should a substantially affected person who fails to timely request a hearing under Section 120.57, F.S., administratively appeal the final Department action or order, the record on appeal should be limited to:

(a) the application, and accompanying documentation submitted by the applicant prior to the issuance of the agency's intent to issue or deny the requested permit.

(b) the materials and information relied upon by the agency in determining the final agency action or order;

(c) any notices issued or published; and

(d) the final agency action or order entered concerning the permit application.

(4) In such cases where persons do not timely exercise their rights accorded by Section 120.57(1), Florida Statutes, the allegations of fact contained in or incorporated by the final agency action shall be deemed uncontested and true, and appellants may not dispute the truth of such allegations upon subsequent appeal.

(5) Any applicant may challenge the Department's request for additional information by filing with the Office of General Counsel an appropriate petition for administrative proceeding pursuant to Section 120.60, F.S., following receipt by the applicant of the Department's notification, pursuant to Section 403.0876, F.S., that additional information is required.

Specific Authority: 120.53, 403.0876, 403.815, F.S. Law Implemented: 120.53, F.S.

History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

Florida Department of Environmental Regulation

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

Bob Martinez, Governor | Dale Twachtmann, Secretary | John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

Permittee:

Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218

I.D. Number:	31-16-0067-21
Permit/Certification Number:	AO16-155275
Date of Issue:	December 20, 1988
Expiration Date:	November 30, 1993
County:	Duval
Latitude/Longitude:	30:25:15/81:36:00
UTM:	E-7441.75 N-3365.60
Project:	No. 3 Lime Slaker

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

For the operation of a lime slaker with a scrubber

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

Source	Control Equipment
No. 3 Lime Slaker	Goslin Birmingham No. 36 Posidraft Slake Scrubber

Emission source(s) shall be as follows:

Point	Source
21	No. 3 Lime Slaker

Located at 9469 Eastport Road, Jacksonville, Florida 32218

Supporting documents shall be as follows:

(1) Permit Application dated August 31, 1988
(2) Construction Permit AC16-144791
(3) Bio-Environmental Services Division's letter dated September 14, 1988
(4) Seminole Kraft Corporation's letter received September 22, 1988

Permittee:	**I.D. Number:**	31-16-0067-21
	Permit/Certification Number:	AO16-155275
Seminole Kraft Corporation	**Date of Issue:**	December 20, 1988
	Expiration Date:	November 30, 1993

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Condition and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.16 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that t department will review this permit periodically and may initiate enforcement action for any violation of th "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 approve drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, conditions of this permit may constitute grounds for revocation and enforcement action by the departmen

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does n convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or priva property or any invasion of personal rights, nor any infringement of federal, state, or local laws regulations. This permit does not constitute a waiver of or approval of any other department permit tha 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 title, and does not constitute authority for the use of submerged lands unless herein provided and the necessa title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvemer 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, anima plant or aquatic life, or property and penalties therefore caused by the construction or operation of th permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statut and department rules, unless specifically authorized by an order from the department.

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

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, up presentation of credentials or other documents as may be required by law, access to the premises, at reasonab 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 limitation specified in this permit, the permittee shall immediately notify and provide the department wi the following information:
   a. A description of and cause of non-compliance; and
   b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipa time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and p vent recurrence of the non-compliance.

   The permittee shall be responsible for any and all damages which may result and may be subject to enforcem 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 non-compliance of the permitted activity until the transfer is approved by the department.

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

13. This permit also constitutes:
    ( ) Determination of Best Available Control Technology (BACT)
    ( ) Determination of Prevention of Significant Deterioration (PSD)
    ( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
    ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:
    a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
    b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report, or application unless otherwise specified by department rule.
    c. Records of monitoring information shall include:
        - the date, exact place, and time of sampling or measurements;
        - the person responsible for performing the sampling or measurements;
        - the date(s) analyses were performed;
        - the person responsible for performing the analyses;
        - the analytical techniques or methods used; and
        - the results of such analyses

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

Permittee:	**I.D. Number:**	31-16-0067-21
	Permit/Certification Number:	AO16-155275
Seminole Kraft Corporation	**Date of Issue:**	December 20, 1988
	Expiration Date:	November 30, 1993

SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)5., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).

2. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and Rule 2.501, JEPB.

3. Testing of emissions shall be accomplished at a minimum of 90% of the permitted capacity. If testing is performed at a rate less than 90% of the permitted capacity, operation shall be limited to a maximum of 110% of the tested capacity until such time as an acceptable test is performed at a minimum of 90% of the permitted capacity. When operation is restricted to a lower capacity because of testing at such a level, BESD, upon advanced notification, will allow operation at higher capacities if such operation is for demonstrating compliance at a higher capacity.

4. Any revision(s) to a permit (and application) shall be submitted and approved prior to implementing.

5. Control equipment shall be provided with a method of access that is safe and readily accessible.

6. Stack sampling facilities shall be required and shall comply with the requirements of Rule 17-2.700(4), FAC, and Rule 2.207, JEPB.

7. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.

8. The following pollutant(s) shall be tested at intervals indicated from the date of July 31, 1988:

Pt. No.	Pollutant	Interval	Test Method
21	Particulate Matter (PM)	12 Months	EPA Reference Method (RM) 5
	Visible Emissions (VE)	12 Months	EPA RM 9

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

Pt. No.	Pollutant	[1]FAC	[2]JEPB	Other
21	PM	17-2.650(2)(b)3.	2.207	
	VE	17-4.070(3)		
	Objectionable Odors (OO)	17-2.620(2)	2.205	

10. The maximum allowable emissions shall be as follows:

Pt. No.	Pollutant	lbs/hr	T/yr	Other	Opacity
21	PM	0.22	<1.0		
	VE				5%
	OO			None Allowed	

11. Visible emissions and particulate emissions tests shall run concurrently.

12. A pressure meter shall be installed on the scrubber system for the lime slaker to measure the scrubbing liquid supply pressure. The pressure sensor or tap shall be located close to the scrubber liquid discharge point. The monitoring device is to be certified by the manufacturer to be accurate within ± 15 percent of design scrubbing liquid supply pressure.

13. The maximum process input rate shall be limited to 725,000 lbs/hr of green liquor (@15% solids) and 32,000 lbs/hr of lime (dry).

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

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

16. Unconfined particulate matter emissions from yard operations, open stockpiling of materials and/or materials handling operations shall be controlled by using the following reasonable precautions in accordance with Rule 17-2.610(3), Florida Administrative Code FAC, and Rule 2.204(d), JEPB:

    - Reduced speeds for vehicular traffic.
    - Use of liquid resinous adhesives or other liquid dust suppressants or wetting agents.
    - Use of paving or other asphaltic materials.
    - Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or otherwise by wetting prior to sweeping.
    - Covering of trucks, trailers, front end loaders, and other vehicles or containers to prevent spillage of particulate matte during transport.
    - Use of mulch, hydroseeding, grassing, and/or other vegetative ground cover on barren areas to prevent or reduce particulate matter from being windblown.
    - Use of hoods, fans, filters, and similar equipment to contain, capture, and vent particulate matter.
    - Enclosure or covering of conveyor systems.

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

Issued this 20 day of December, 1988

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

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

State of Florida
Department of Environmental Regulation

Ernest E. Frey, Deputy Assistant Secretary

[1]Florida Administrative Code
[2]Jacksonville Environmental Protection Board

DER FORM 17-1.201(5) Effective November 30, 1982
(Disc: 6/23-25 rlj)

ATTACHMENT I

Proposed operation and maintenance plan for No. 3 Slaker Scrubber, required by RACT portion 17-2.650.

1. OPERATION

   a. Caustic operator will record scrubber feed water pressure once per hour.

   b. Caustic operator will record green liquor feed rate once per hour.

   c. Caustic operator will record feed green liquor temperature once per shift.

   d. Caustic operator will record slaker temperature once per hour.

   e. Caustic operator will record slaker type of lime used and relative amount once per hour.

      eg - 1/2 fresh lime 1/2 reburned lime

2. MAINTENANCE

   a. The No. 3 Slaker will routinely have 1 maintenance outage per year with the rest of the mill. Other maintenance will be scheduled as needed. All maintenance records will be kept by the maintenancee department.

Final Determination

Seminole Kraft Corporation
Duval County

Lime Slaker with Scrubber
Permit No. AC 16-144791
APIS No. 31DVL16006721

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

April 20, 1988

Final Determination

Seminole Kraft Corporation's application for a permit to construct/install a Lime Slaker with a scrubber at their facility in Jacksonville, Duval County, Florida, has been reviewed by the Bureau of Air Quality Management.

Public Notice of the Department's Intent to Issue the construction permit was published in The Jacksonville Journal on April 4, 1988.

Copies of the Preliminary Determination have been available for public inspection at the Department's Northeast District office in Jacksonville, the Duval County's Bio-Environmental Services Division (BESD) in Jacksonville, and the Department's Bureau of Air Quality Management in Tallahassee.

Comments were received from Mr. Curt Barton and Mr. John Millican. Their comments were in regard to Specific Condition No. 5.

The Bureau has considered the comments and agrees to change the above mentioned condition as requested, since a higher opacity is allowed by FAC Rule 17-2.650(2)(c)(12)(b). Therefore, Specific Condition No. 5 will be changed as follows:

From:

5. 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 5% opacity, 6 minute average. Compliance tests for PM shall be demonstrated using EPA Methods 1, 2, 3, 5, and 9, in accordance with 40 CFR 60, Appendix 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:

5. 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, Appendix 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.

The final action of the Department is to issue the permit with the changes as described in this final determination.

BEST AVAILABLE COPY

68547 7763

The Florida Times-Union — Jacksonville Journal

FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared Bill Champion who on oath says that he is Retail Advertising Supervisor of The Florida Times-Union, and Jacksonville Journal, daily newspapers published at Jacksonville in Duval County, Florida; that the attached copy of advertisement, being a Legal Notice in the matter of Notice of Intent

in the ______ Court,

was published in The Jacksonville Journal

in the issues of April 4, 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 4th day of April A.D. 19 88

Olivia Bush
Notary Public,
State of Florida at Large.

Bill Champion

My Commission Expires NOTARY PUBLIC, STATE OF FLORIDA
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 a permit to Seminole Kraft Corporation [illegible] install a Lime Slaker with scrubber [illegible] ed at Seminole Kraft Corporation [illegible] Jacksonville, Duval County, Florida.

The Department is issuing the [illegible] 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 [illegible] 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 Environmental Regulation
Northeast District Office
3426 Bills Road
Jacksonville, Florida 32207

Duval County Department of Health, Welfare and Bio-Environmental Services
421 West Church Street
Suite 412
Jacksonville, Florida 32202

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

RECEIVED
APR 8 1988
DER - BAQM

Copied [illegible] [illegible]
4.12.88

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

PERMITTEE:
Seminole Kraft Corporation
P. O. Box 26998
Jacksonville, FL 32210

Permit Number: AC 16-144791
Expiration Date: December 1, 1988
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: Lime Slaker with a Scrubber

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 construction of a lime slaker with a scrubber. This unit will be located at the Seminole Kraft Corporation facility in Jacksonville, Duval County, Florida. The UTM coordinates of this site are Zone 17, 441.75 East and 3365.60 North.

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

Attachments

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16) dated February 2, 1988.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-144791
Expiration Date: December 1, 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. This source shall be allowed to operate continuously (8760 hours/year).

SPECIFIC CONDITIONS:

2. In accordance with FAC Rule 17-2.610(3), Unconfined Emissions of PM, reasonable precautions to control emissions of unconfined PM may include, but shall not be limited to the following:

a) Reduced speeds for vehicular traffic.

b) Use of liquid resinous adhesives or other liquid dust suppressants or wetting agents.

c) Use of paving or other asphaltic materials.

d) Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or otherwise by wetting prior to sweeping.

e) Covering of trucks, trailers, front end loaders, and other vehicles or containers to prevent spillage of particulate matter during transport.

f) Use of mulch, hydroseeding, grassing and/or other vegetative ground cover on barren areas to prevent or reduce windblown particulate matter.

g) Use of hoods, fans, filters, and similar equipment to contain, capture, and vent particulate matter.

h) Enclosure or covering of conveyor systems.

3. In accordance with FAC Rule 17-2.620(2), no person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

4. In accordance with FAC Rule 17-2.240, Circumvention, no person shall circumvent any air pollution control device or allow the emissions or air pollutants without the applicable pollution control device operating properly.

SPECIFIC CONDITIONS:

5. 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, Appendix 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.

6. Visible emissions and particulate emissions tests shall run concurrently.

7. A pressure meter shall be installed on the scrubber system for the lime slaker to measure the scrubbing liquid supply pressure. The pressure sensor or tap shall be located close to the scrubber liquid discharge point. The monitoring device is to be certified by the manufacturer to be accurate within $\pm$ 15 percent of design scrubbing liquid supply pressure.

8. The lime slaker is subject to the provisions of FAC Rule 17-2.250, Excess Emissions.

9. The construction shall reasonably conform to the plans and schedule submitted in the application. If the applicant is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit (FAC Rule 17-4.09).

To obtain a permit to operate, the applicant must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Duval County Department of Health, Welfare & Bio-Environmental Services (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. Operation beyond the construction permit expiration date requires a valid permit to operate (FAC Rules 17-4.22 and 17-4.23).

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-144791
Expiration Date: December 1, 1988

SPECIFIC CONDITIONS:

If the construction permit expires prior to the applicant requesting an extension or filing an application for a permit to operate, then all activities at the project must cease and the applicant must apply for a new permit to construct which can take up to 90 days to process a complete application (FAC Rule 17-4.10).

10. Upon obtaining a permit to operate, the permittee will be required to submit annual reports on the actual operation and emissions of this source. Annual reports shall be sent to Duval County Bio-Environmental Services Division (BESD).

Issued this 20 day of April, 1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

May 1, 1989

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

Dear Mr. Fancy:

This letter is to request the Department's assistance in a matter pertaining to Seminole Kraft's No.3 Lime Slaker Operating Permit (AO 16-155275). An application for a permit to install the No.3 Lime Slaker was submitted to the Department in early 1988 and the Department issued a permit to install the No.3 Lime Slaker at our mill in Jacksonville on April 22, 1988 (see attached permit AC 16-144791). That permit contained a variety of specific conditions which we were required to meet and which if achieved would authorize us to obtain a permit to operate this source in the future. Specific Condition 5 of the construction permit required that we install a scrubber system to control particulate emissions from the No.3 Lime Slaker to not exceed 3.2 lb/hour and 7.0 tons per year. Further visible emissions were limited to no more than the average opacity level achieved during the initial compliance test, which establishes compliance with the above particulate standard, plus 5% opacity. On this basis, Seminole Kraft designed and installed the No.3 Lime Slaker and scrubber system to achieve the aforementioned standards, assuming that demonstrating compliance with such standards and filing a timely application for a permit to operate the No.3 Lime Slaker would result in the issuance of a permit to operate which contained a specific condition for particulate emissions based on Specific Condition 5 of the construction permit.

Accordingly, we were extremely surprised when BESD and DER (Northeast District) issued the attached permit to operate (AO16-155275) which contained the following specific condition with respect to particulate emissions:

10. The maximum allowable emissions shall be as follows:

PT. No.	Pollutant	lbs/Hr	T/Yr	Other	Opacity
21	PM	0.22	<1.0		
	VE				5%
	OO			Not Allowed	

As you can note, BESD and the Department (Northeast District) inexplicably reduced the particulate emission limits established earlier in the construction permit which authorized us to design and install the No.3 Lime Slaker and which we had every reason to believe would be carried over to the permit to operate. Indeed our application specifically stated that we would meet the requirements of Chapter 17-2.650(2)(C) (Ract requirements) by installing an emission control device (wet scrubber) which would achieve 98% efficiency. Under Chapter 17-2.650(2)(C)12. (Ract Particulate requirements for miscellaneous manufacturing process operations) particulate emissions shall be limited to 0.03 grams/dscf, or any visible emissions to 5% opacity. However, the owner or operator may exceed these emission limits if he utilizes a pollution control device or system for control of particulate matter which has a particulate collection efficiency of at least 98%. If this less restrictive standard is chosen, visible emissions shall be the average opacity level achieved during the initial compliance test which established compliance with the standard, plus 5 per cent opacity. In making its initial determination to issue a permit to construct and later, in issuing the permit to construct, DER agreed with our Ract analysis proposed particulate emission limits based on 17-2.650(2)(C)12 and included in Specific Condition #5 in the construction permit. Longstanding CAPS policy requires that applicable construction permit conditions by included in the subsequent operating permit. To change emission limits imposed by a construction permit specific condition requires a modification pursuant to 17-4.080. Therefore, we believe the No.3 Lime Slaker operating permit must be based on this same specific condition and hence the particulate emission limits previously approved by DER in the construction permit.

We would appreciate your assistance in working with the Northeast District Office and BESD to revise the particulate emission limits in the permit to operate to be consistent with those contained in the construction permit previously approved by the Department. If your schedule permits, we would like to meet with you to discuss this matter within the next two weeks.

Sincerely,

L.A. Stanley
General Manager

ah
attachments

CC: James Manning, BESD
Ron Roberson, BESD
Ernest Frey
Curt Barton
Terry Cole
John Millican
Mike Riddle

Seminole Kraft Corporation

Jacksonville Mill
9469 Eastport Road
PO Box 26998
Jacksonville Florida 32218-0998
904 751 6400

August 18, 1988

Mr. Wayne Walker
Department of Health, Welfare
and Bio-Environmental Services
4th Floor
421 W. Church Street
Jacksonville, FL 32202

Subject: Initial Particulate Test and Visible Emission Evaluation Performed on July 14, 1988 on the No. 3 Slaker. Construction Permit No. AC16-144791.

Dear Mr. Walker:

Enclosed are the results of the above referenced test. The average particulate emission rate measured during the test was 0.08 pounds per hour, which is well below our construction permit limit of 3.2 pounds per hour. The average opacity observed was 0 percent during the test.

The testing and laboratory work was performed by Messrs. Raymond Pevy and Richard Mattson of Seminole Kraft. Mr. Michael Riddle performed the visible emission observation and prepared the report.

If you have any questions concerning the report or the testing, please contact me at 751-6400, ext. 279.

Sincerely,

Michael L. Riddle
Environmental Supervisor

Enclosure

cc: Malcolm Williams
Frank Lee
Curt Barton
Joe Konopa
Ken Johnson

/pt

AC16-144791

file copy

LAW OFFICES

OERTEL & HOFFMAN

A PROFESSIONAL ASSOCIATION

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

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

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

April 15, 1988

BY HAND DELIVERY

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

Dear Mr. Thomas:

This will confirm your discussion with Mr. Barton and Mr. Millican on Thursday morning, April 14, 1988 regarding the draft construction permit for a new lime slaker at the Seminole Kraft Corporation plant in Jacksonville, (DER File No. AC 16-144791). As agreed at that meeting the opacity limit in Specific Condition 5 should be modified as provided for in F.A.C. Rule 17.2.650(2)(c)(12)(b). This rule provides that if Rule 17-2.650(2)(c)(12) is the least restrictive standard (98% collection efficiency), the opacity standard for the source shall be the average opacity level achieved during the initial particulate emission compliance test which establishes compliance with the standard, plus 5% opacity.

Accordingly we request that the third sentence in Specific Condition 5 be amended to read: "visual 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".

We would also like to repeat the request that every effort be made to issue this permit by April 19, 1988. As noted previously our annual shutdown begins that day and it is extremely important that we be permitted to install the new lime slaker during this shutdown.

LAW OFFICES
OERTEL & HOFFMAN
A PROFESSIONAL ASSOCIATION
POST OFFICE BOX 6507
TALLAHASSEE, FLORIDA 32314-6507

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

We appreciate the opportunity to discuss this matter with you and also appreciate your favorable consideration of our request.

Sincerely,

Segundo J. Fernandez
for Terry Cole

TC:slt
1003.013

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

Copied:
Teresa Heron
CHF/BT
Khurshid Mekka, BESD
4.19.88

Airborne Express PM
68547 7763 4.7.88
Jacksonville, FL
File Copy

Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

April 6, 1988

RECEIVED
APR 8 1988
DER - BAQM

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

Subject: Notice of Intent to issue a construction permit for a new lime slaker

Dear Mr. Thomas:

You will find attached the certification of publication for the Notice of Intent referenced above. We would like to thank you for the expedited handling of this permit application, and would appreciate your signing the actual permit on April 19 if no objections are raised by third party petitioners. This would allow us to meet our scheduling for the installation.

We would only raise one question on the reference construction permit. In specific condition 5 we believe the sentence, "The Duval County Bio-Environmental Services Division (BESD) office shall be notified 15 days prior to testing", should read as follows: "The Duval County Bio-Environmental Services Division (BESD) office shall be notified at least 15 days prior to testing".

Again, we would like to thank you for the expedious processing of this application to construct a source which will benefit our environment as well as our business.

Sincerely,

T. Frank Lee
General Manager

cc: Malcolm Williams
Curt Barton
Joe Konopa
Tom Caradine
Charles Stewart

TFL/pt

Copied: Teresa Heron
Jerry Woodley, BESD } 4.12.88 (mm)

BEST AVAILABLE COPY

AIRBORNE EXPRESS℠

RECEIVER'S COPY

202 (5/86)

ORIGIN JAX | AIRBILL NO. [illegible] 53

FROM	TO
SEMINOLE KRAFT	Bureau of Air Quality Management
9469 EASTPORT RD	2600 Blaim Stone Road
JACKSONVILLE FL 32218	Tallahassee, FL 32399-2400
ANNE HARRIS 904 751 6400	Mr. Bill Thomas
BILLING REFERENCE INFORMATION TO APPEAR ON INVOICE	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)
- ☐

13 AIRBORNE SIGNATURE [illegible] DATE RECEIVED [illegible]

TO REMOVE COPY INSERT PENCIL

Airborne Express Mailed
68547 7763 4.7.88
Jacksonville, FL

The Florida Times-Union Jacksonville Journal

FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared Bill Champion

who on oath says that he is

Retail Advertising Supervisor of The Florida Times-Union, and

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

Florida; that the attached copy of advertisement, being a

Legal Notice

in the matter of Notice of Intent

in the Court,

was published in The Jacksonville Journal

in the issues of April 4, 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 4th day of April A.D. 19 88

Olivia Bush
Notary Public,
State of Florida at Large.

Bill Champion

My Commission Expires NOTARY PUBLIC, STATE OF FLORIDA
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 a permit to Seminole Kraft Corporation to construct/install a Lime Slaker with scrubber to be located at Seminole Kraft Corporation 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 Environmental Regulation
Northeast District Office
3426 Bills Road
Jacksonville, Florida 32207
Duval County Department of Health,
Welfare and Bio-Environmental Services
421 West Church Street
Suite 412
Jacksonville, Florida 32202

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

RECEIVED
APR 8 1988
DER - BAQM

Copied: Jerry Wooley, BESD
Teresa Heron
4.12.88

AIRBORNE EXPRESS

SHIPPING LABEL 22334360 202 (5-86)

ORIGIN AIRBILL NO.

FROM	TO
SEMINOLE KRAFT	Bureau of Air Quality Management
9149 EASTPORT RD	2600 Blair Stone Road
JACKSONVILLE FL 32218	Tallahassee, FL 32399-2400
E HARRIS 904 751 6400	Mr. Bill Thomas
BILLING REFERENCE INFORMATION TO APPEAR ON INVOICE	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. $

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)
- ☐

ORIGIN AIRBILL NO. B. Bradley 4-7-88

HERE AND SLIDE UP PERFORATION

RECEIVED
APR 8 1988
BAQM-TLH

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

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

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:
Mr. T. Frank Lee, General Manager
Seminole Kraft Corporation
P.O. Box 26998
Jacksonville, FL 32218

4. Article Number
P 274 010 358

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**

P 274 010 358

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

Sent to Mr. T. Frank Lee, Gen. Mgr. Seminole Kraft Corp.	
Street and No. P.O. Box 26998	
P.O., State and ZIP Code Jacksonville, FL 32218	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date Mailed: 03-31-88 Permit: AC 16-144791	

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

March 31, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Lee:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for Seminole Kraft Corporation to construct/install a Lime Slaker with a scrubber.

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/ks

Attachments

cc: John T. McKinnon, P.E., Stone Container Corp.
Jerry Woosley, BESD

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

DER File No. AC 16-144791

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the applications specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Seminole Kraft Corporation, applied on February 2, 1988, to the Department of Environmental Regulation for a permit to construct/install a Lime Slaker with scrubber to be located at Seminole Kraft Corporation 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:

Jerry Woosley, BESD
John T. McKinnon, P.E.

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

(1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.

(2) All petitions filed under these rules should contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name and address of the petitioner or petitioners;

(c) All disputed issues of material fact. If there are none, the petition must so indicate;

(d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;

(e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;

(f) A demand for the relief to which the petitioner deems himself entitled; and

(g) Such other information which the petitioner contends is material.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on March 31, 1988.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52(9), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Judy Rogers
Clerk

March 31, 1988
Date

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Seminole Kraft Corporation to construct/install a Lime Slaker with scrubber to be located at Seminole Kraft Corporation 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 Environmental Regulation
Northeast Distict Office
3426 Bills Road
Jacksonville, Florida 32207

Duval County Department of Health,
Welfare and Bio-Environmental Services
421 West Church Street
Suite 412
Jacksonville, Florida 32202

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

Technical Evaluation
and
Preliminary Determination

Seminole Kraft Corporation
Duval County

Lime Slaker with Scrubber
Permit No. AC 16-144791
APIS No. 31DVL16006721

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

March 31, 1988

I. NAME AND ADDRESS OF APPLICANT

Seminole Kraft Corporation
Post Office Box 26998
Jacksonville, Florida 32218

II. REVIEWING AND PROCESS SCHEDULE

Date of Receipt of Application: February 2, 1988

Application Completeness Date: February 2, 1988

III. FACILITY INFORMATION

III.1 Facility Location

The proposed source is located at 9469 Eastport Road, in Jacksonville, Duval County, Florida. The UTM coordinates are Zone 17, 441.75 East and 3365.60 North.

III.2 Standard Industrial Classification Code (SIC)

This facility is classified as follows:

Major Group No. 26 - Paper and Allied Products

Group No. 262 - Paper Mills
Industry No. 2621 - Paper Mills

III.3 Facility Category

Seminole Kraft Co. is a major facility. This facility is on the list of the 28 Major Facility Categories, Table 500-1, Chapter 17-2, Florida Administrative Code. The proposed source will emit approximately 7 tons per year of particulate matter.

IV. PROJECT DESCRIPTION

This project consist of replacement of the existing lime slaker with a new one. The particulate emissions from the new slaker will be controlled by a Goslin 36" positive draft 30 4L stainless steel scrubber with a 35" flange for connection to a 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 flow is estimated to be 50-120 gpm as required. Scrubber efficiency is estimated to exceed 99%.

V. RULE APPLICABILITY

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, FAC.

This source site is located in the designated area of influence for the particulate matter nonattainment area in Duval County. This county is also designated nonattainment for ozone and attainment for the remaining pollutants, Rule 17-2.410, and 17-2.420, FAC.

Seminole Kraft Corporation is classified as a major facility. The facility category is on the list of the 28 Major Facility Categories Table 500-1, FAC.

This project, installation of new slaker with scrubber, is exempt from the New Source Review Requirements for Nonattainment Areas, Rule 17-2.510, FAC, because it will not cause a significant increase of particulate matter emissions. An overall reduction of particulate matter emissions is expected. This reduction is not creditable in accordance with Rule 17-2.510(2)(1)3, FAC, Contemporaneous Emissions Changes. The existing slaker has neither construction or operating permits.

This source shall be permitted under Rule 17-2.520, FAC, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements. The proposed source shall comply with Florida Administrative Code Rules 17-2.650(2)(c)12, Miscellaneous Manufacturer Process Operations, 17-2.700, Stationary Point Sources Emissions Test Procedures, 17-2.620(2), Objectionable Odors, 17-2.240, Circumvention, and 17-2.610(3), Unconfined Emissions.

VI. EMISSIONS SUMMARY

The operation of the lime slaker will produce emissions of particulate matter. These emissions will be controlled by a scrubber. The estimated scrubber efficiency is 99%. The allowable emissions for this source will be 3.2 lbs/hr and 7 tons/year.

VI.1 Air Quality Analysis

From a technical review of the application, the Department has determined that the installation and operation of this source will not have an adverse impact on Florida's ambient air quality.

VII. CONCLUSION

Based on the review of the data submitted by Seminole Kraft, the Department concludes that compliance with all applicable state air quality regulations will be achieved provided certain specific conditions are met. The impact of installing and operating the lime slaker and scrubber at the Seminole Kraft facility will not cause or contribute to a violation of any ambient air quality standards.

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 32210

Permit Number: AC 16-144791
Expiration Date: December 1, 1988
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: Lime Slaker with a Scrubber

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 construction of a lime slaker with a scrubber. This unit will be located at the Seminole Kraft Corporation facility in Jacksonville, Duval County, Florida. The UTM coordinates of this site are Zone 17, 441.75 East and 3365.60 North.

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

Attachments

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16) dated February 2, 1988.

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-144791
Expiration Date: December 1, 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. This source shall be allowed to operate continuously (8760 hours/year).

SPECIFIC CONDITIONS:

2. In accordance with FAC Rule 17-2.610(3), Unconfined Emissions of PM, reasonable precautions to control emissions of unconfined PM may include, but shall not be limited to the following:

a) Reduced speeds for vehicular traffic.

b) Use of liquid resinous adhesives or other liquid dust suppressants or wetting agents.

c) Use of paving or other asphaltic materials.

d) Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or otherwise by wetting prior to sweeping.

e) Covering of trucks, trailers, front end loaders, and other vehicles or containers to prevent spillage of particulate matter during transport.

f) Use of mulch, hydroseeding, grassing and/or other vegetative ground cover on barren areas to prevent or reduce windblown particulate matter.

g) Use of hoods, fans, filters, and similar equipment to contain, capture, and vent particulate matter.

h) Enclosure or covering of conveyor systems.

3. In accordance with FAC Rule 17-2.620(2), no person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

4. In accordance with FAC Rule 17-2.240, Circumvention, no person shall circumvent any air pollution control device or allow the emissions or air pollutants without the applicable pollution control device operating properly.

SPECIFIC CONDITIONS:

5. 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 5% opacity, 6 minute average. Compliance tests for PM shall be demonstrated using EPA Methods 1, 2, 3, 5, and 9, in accordance with 40 CFR 60, Appendix 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.

6. Visible emissions and particulate emissions tests shall run concurrently.

7. A pressure meter shall be installed on the scrubber system for the lime slaker to measure the scrubbing liquid supply pressure. The pressure sensor or tap shall be located close to the scrubber liquid discharge point. The monitoring device is to be certified by the manufacturer to be accurate within $\pm$ 15 percent of design scrubbing liquid supply pressure.

8. The lime slaker is subject to the provisions of FAC Rule 17-2.250, Excess Emissions.

9. The construction shall reasonably conform to the plans and schedule submitted in the application. If the applicant is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit (FAC Rule 17-4.09).

To obtain a permit to operate, the applicant must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Duval County Department of Health, Welfare & Bio-Environmental Services (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. Operation beyond the construction permit expiration date requires a valid permit to operate (FAC Rules 17-4.22 and 17-4.23).

PERMITTEE:
Seminole Kraft Corp.

Permit Number: AC 16-144791
Expiration Date: December 1, 1988

SPECIFIC CONDITIONS:

If the construction permit expires prior to the applicant requesting an extension or filing an application for a permit to operate, then all activities at the project must cease and the applicant must apply for a new permit to construct which can take up to 90 days to process a complete application (FAC Rule 17-4.10).

10. Upon obtaining a permit to operate, the permittee will be required to submit annual reports on the actual operation and emissions of this source. Annual reports shall be sent to Duval County Bio-Environmental Services Division (BESD).

Issued this_____day of_____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

_____
Dale Twachtmann, Secretary

ATTACHMENT 1

Available Upon Request.

PM
3/4/88
Jacksonville, FL

File Copy

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

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
AC 16-144791

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.

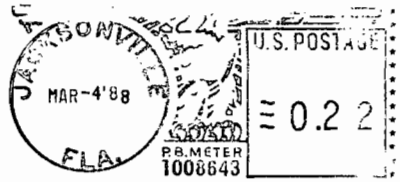
D. Section III C. What other pollutants are emitted from this process? Please clarify.

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.

ENVIRONMENTAL PROTECTION BOARD
515 West 6th Street
Jacksonville, Florida 32206-4397



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

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

Very truly yours,

Jerry E. Woosley
Associate Pollution Control Engineer

JEW/mh

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

disc 6mh/4

Copies: Teresa Heran CHF I BT } 3/7/88 mm

Seminole Kraft Corporation

Jacksonville Mill

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

904 751-6400

DER
FEB 1
BAQM

February 1, 1988

DER
FEB 2 1988
BAQM

Mr. Clair Fancy, P.E.
Deputy Bureau Chief
Florida Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

Dear Mr. Fancy:

Attached is a construction permit application for a new lime slaker at our Jacksonville pulp mill. This slaker will replace our existing No.2 side slaker. This new slaker will result in a significant reduction in both total suspended particulate (TSP) and PM_{10} (see attached application). Also, please note that we have calculated a RACT emission limit for particulate and agree in the permit to accept a limit more stringent than RACT. Accordingly, we believe that there should not be any issues regarding this permit and request that the Florida Department of Environmental Regulation issue this permit as quickly as possible so that our proposed April construction date can be met.

Sincerely,

T. Frank Lee
General Manager

ah

attachment

Copied: Teresa Heron
Khorshed Mehta
CHF/BT
} 2.2.88 mr

Subcode 05

Receipt #117513
$100.00
AC 16-144791
V#012185

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [x] New[1] [ ] 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) _____

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: January 1988 Telephone No. 904/751-6400

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

[1] See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed John T. McKinnon, P.E.

John T. McKinnon, P.E.
Name (Please Type)

Stone Container Corporation
Company Name (Please Type)

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

Florida Registration No. 37697 Date: 1/29/88 Telephone No. 404/621-6709

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Replace an existing slaker with a new slaker. See Attachment A

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

Start of Construction April 1, 1988 Completion of Construction April 30, 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.)

Scrubber - $25,000

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

None

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)

Yes

1. Is this source in a non-attainment area for a particular pollutant? No
   But is in area of influence
   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? Yes, See Attachment F

   a. If yes, for what pollutants? Particulate
   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.

See Attachment G

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	32,000 (dry)	17
Green Liquor	NA	NA	725,000 @ 15% solids	17

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

1. Total Process Input Rate (lbs/hr): 757,000 lbs/hour

2. Product Weight (lbs/hr): White Liquor - 595,000 #/hr at 10% solids
Lime Mud - 160,000 #/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	(Uncontrolled) Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
TSP	3.2	7.0	3.2 lbs/hr	3.2 #/hr	2,803,200	1400	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 ENGINEERING JUDGEMENT

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.

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: 600 EST ACFM 460 EST DSCFM Gas Exit Temperature: 130 EST °F.

Water Vapor Content: 15 EST SAT AT EXIT TEMP.% Velocity: 13 EST FPS

SECTION IV: INCINERATOR INFORMATION

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).
   VENDOR ESTIMATE AND EXPERIENCE OF OTHERS WITH SAME APPLICATION.
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 NA 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

NA, See Attachment G

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.

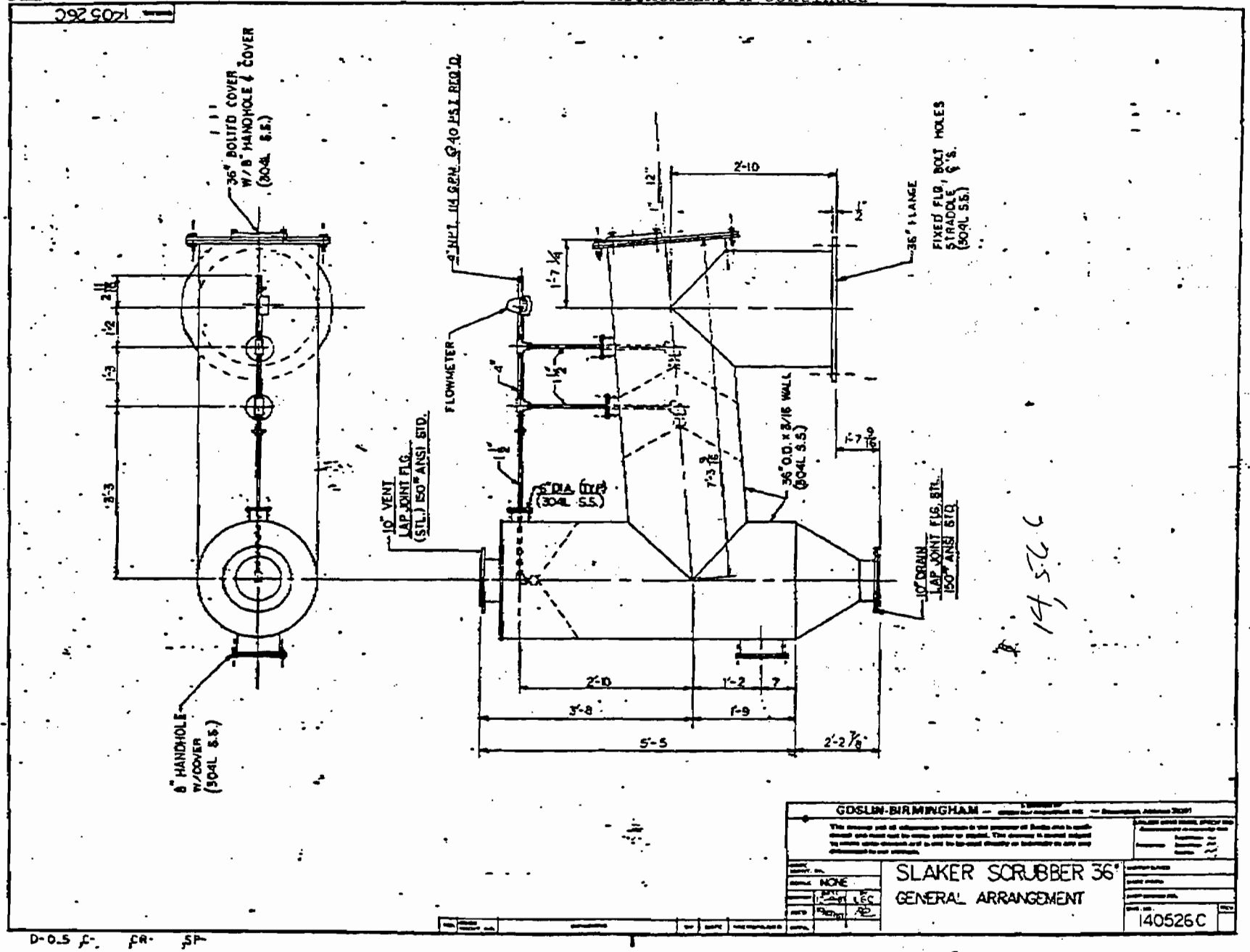
H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

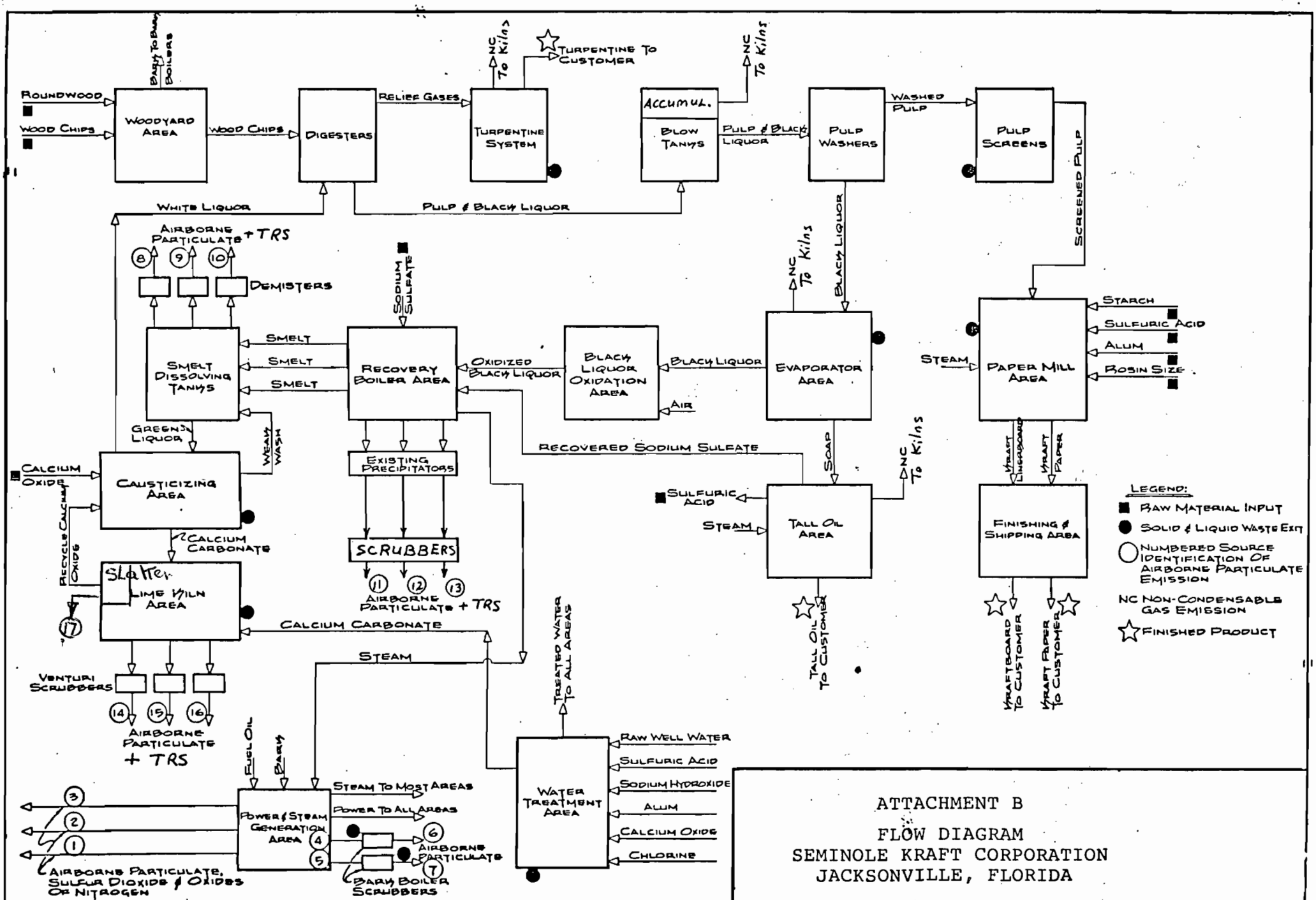
ATTACHMENT A

Slaker Scrubber

Description

The particulate emissions from the new slaker will be 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.)
4" NPT 10 GPM @ 40 P.S.I. REQ'D.
FLOWMETER
10" VENT LAP JOINT FLG. (STL.) 150# ANSI STD.
4" DIA (TYP) (304L S.S.)
36" O.D. X 3/16 WALL (304L S.S.)
36" FLANGE
FIXED FLG. BOLT HOLES STRADDLE (304L S.S.)
10" DRAIN LAP JOINT FLG. STL. 150# ANSI STD.
8" HANDHOLE W/COVER (304L S.S.)
2'-10
1'-2 7
3'-8
1'-9
5'-5
2'-2 7/8"
GOSLIN-BIRMINGHAM
SLAKER SCRUBBER 36"
GENERAL ARRANGEMENT
NONE
140526C

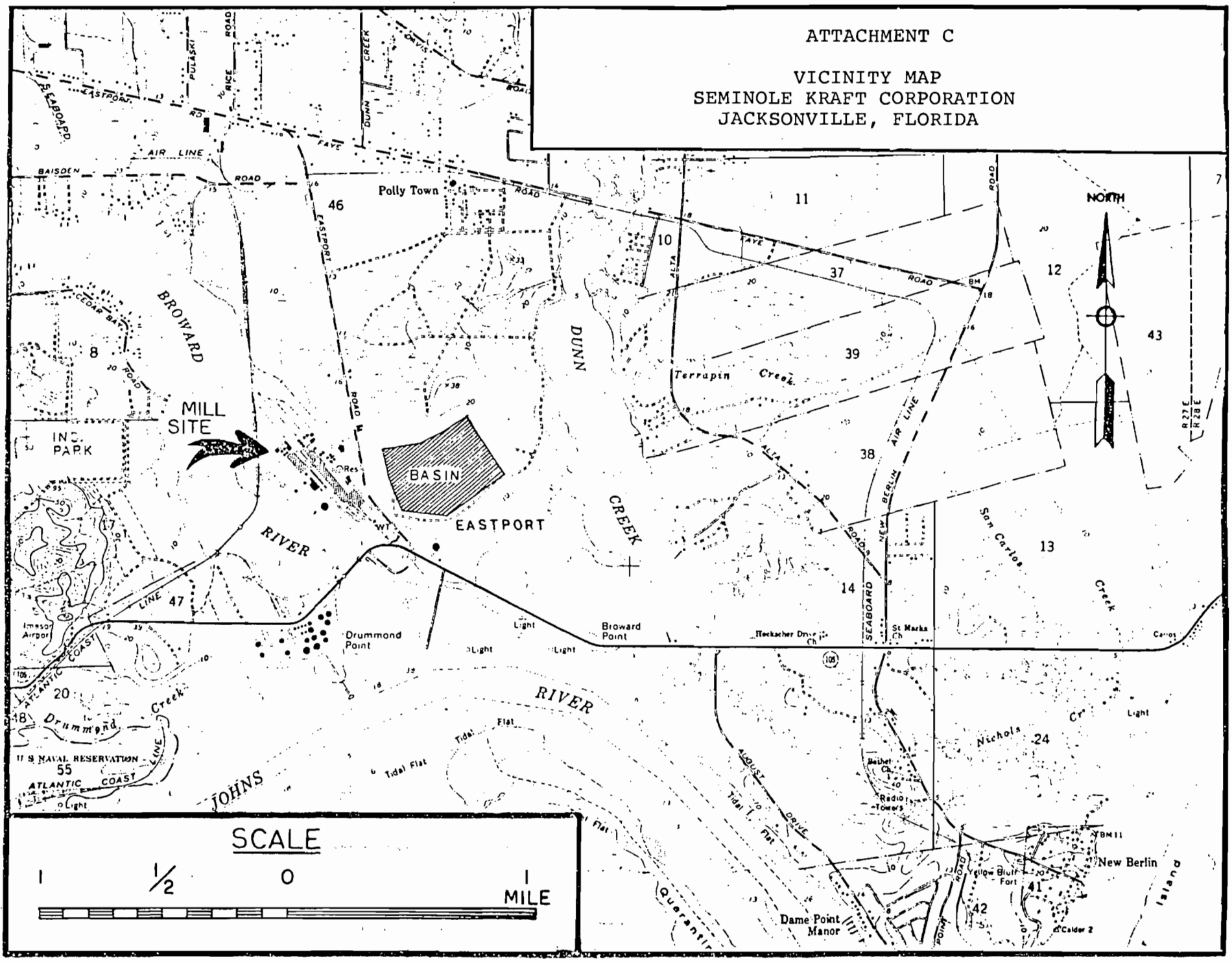


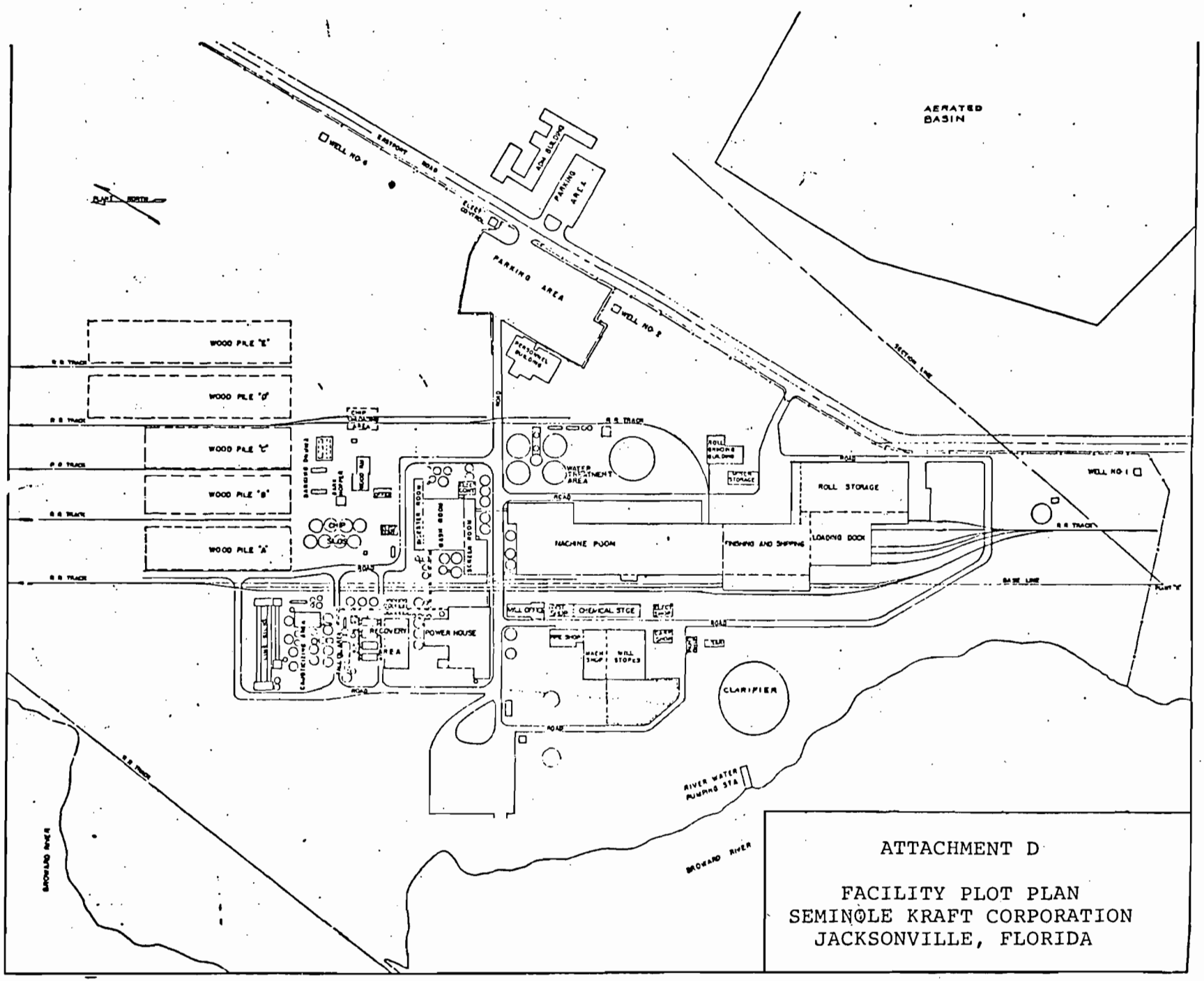
ATTACHMENT B

FLOW DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

ATTACHMENT C

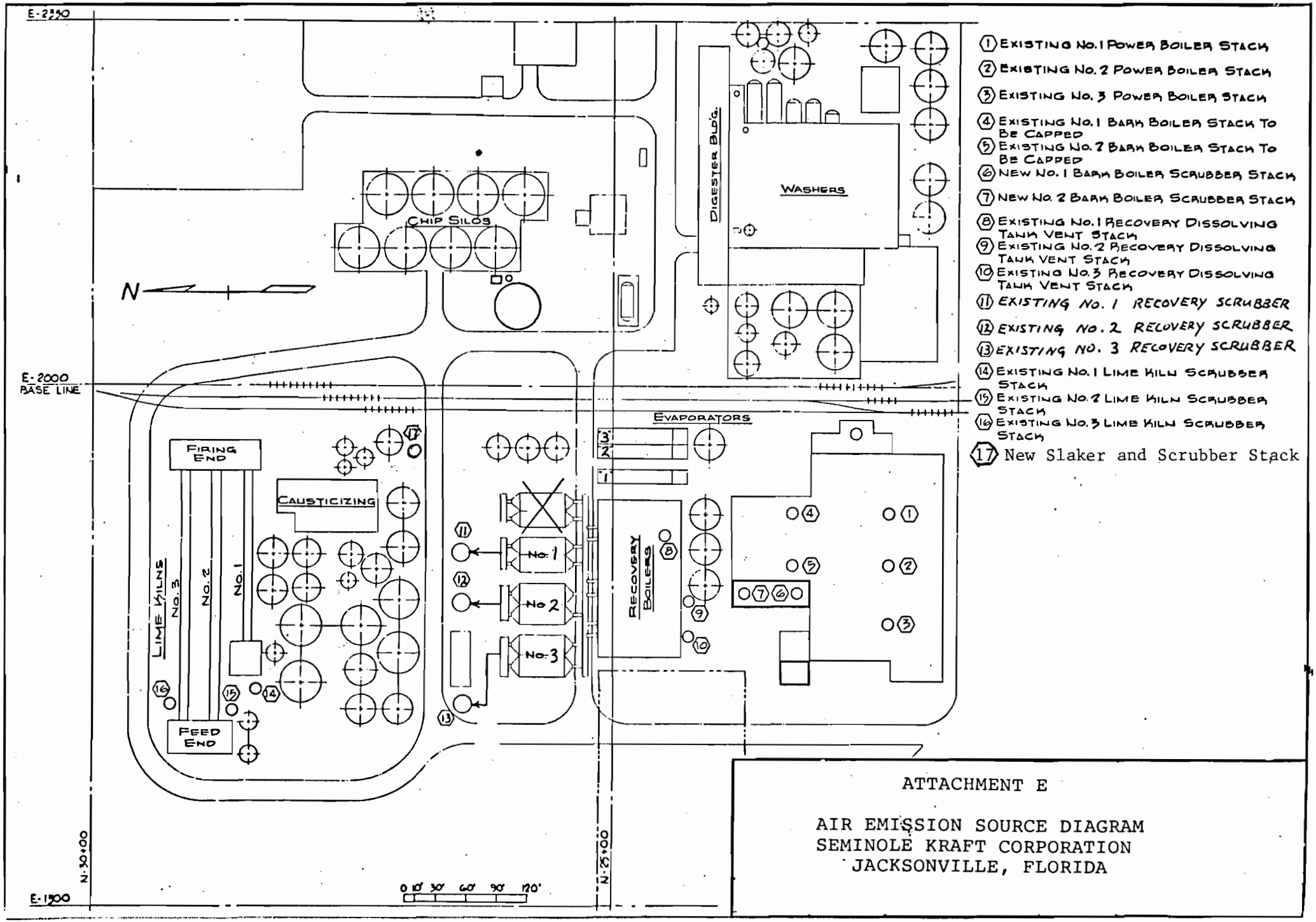
VICINITY MAP
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA





ATTACHMENT D

FACILITY PLOT PLAN
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA



ATTACHMENT E

AIR EMISSION SOURCE DIAGRAM
SEMINOLE KRAFT CORPORATION
JACKSONVILLE, FLORIDA

ATTACHMENT F

Estimated Slaker Emissions
Uncontrolled (Old Slaker and New Slaker)

I. Material Balance

Assume 1% of input lime becomes dust -

$$\frac{.01 \times 384 \text{ tons}}{2000 \quad \text{day}} \times \frac{1 \text{ day}}{24 \text{ hr}} = \frac{320 \text{ lbs}}{\text{hr}}$$

II. Data from Various Sources

AP-42

Controlled (Water Spray) = 0.1#/ton lime

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

Assume 95% efficiency of water spray

$$\text{Uncontrolled} = \frac{1.6\#/\text{hr}}{.05} = 320 \text{ lbs/hr}$$

III. Best Engineering Judgement Based on Above

Uncontrolled is estimated to be 320 lb/hr or 1400 tons/year (approximately 95% PM_{10})

Controlled Emissions (New Slaker)

Assume 1% dust generation -

.01 (384 tons/day x 1/24 x 1/2000) = 320 lb/hr

Assume Scrubber Efficiency = 99.5%

Emissions = .005 (320#/hr) = 1.6#/hr

Emissions = 1.6#/hr x 24 x 365/2000 = 7 tons/year

RACT Emission Limit

Required Scrubber Efficiency = 98%

Recommended RACT Limit = .01 (320 #/hr)
(Based on 99% Efficiency) = 3.2 #/hr

NOTE: We believe modeling would demonstrate that this source has an insignificant impact on the potentially impacted nonattainment area and, hence, this source would not technically be subject to RACT emissions limits. However, we are willing to accept the RACT limits proposed in this application if this permit can be issued expeditiously.

ATTACHMENT G

PSD Applicability

I. General

This new source will not require a PSD analysis because there will not be a net emissions increase as a result of the emissions from this source. The only pollutant involved from this source is particulate. This new source (slaker) will replace an existing slaker. The existing slaker has no controls and the new slaker will have a wet scrubber. Hence, the emissions from the new source will be less than the existing source and a net emissions decrease will result.

II. Calculations

A. Existing Slaker

From Attachment F, the uncontrolled emissions from the existing source are estimated to be 1400 tons/year. Please note that these uncontrolled emissions are fugitive in nature and because of the high moisture content and ground level discharge, probably do not impact off site.

B. New Slaker

From Attachment F, the controlled emissions from the new source are estimated to be 7.0 tons/year.

C. Change in Emissions

The net decrease in particulate emissions is

1400 - 7 = 1393 tons/year

As most is PM_{10} there will be a net decrease in PM_{10} as well.

III. PSD Applicability

As noted above, a PSD review is not applicable to this source because there will be a net emissions decrease and if these offsets were not available, the total particulate emissions from this new source is less than the 25 ton/year de minimus for particulate.

IV. BACT Applicability

No BACT Analysis is required if PSD is not applicable.