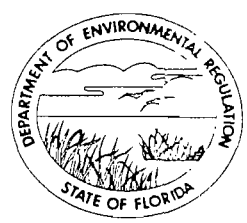


Bruce's Copy

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

February 12, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Lee:

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

Please submit, in writing, any comments which you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

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

CHF/bm

Attachments

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

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Applications for Permits by:

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

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

INTENT TO ISSUE

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

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

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

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit applications. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of

the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copy enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 2-12-88.

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

Martha Wise 2-12-88
Clerk Date

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

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

State of Florida
Department of Environmental Regulation
Notice of Intent

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

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

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

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

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

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

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

Technical Evaluation
and
Preliminary Determination

Seminole Kraft Corporation
Duval County
Jacksonville, Florida

State Construction Permits:

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

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

February 12, 1988

I. Application

A. Applicant

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

B. Project Description and Location

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

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

The Standard Industrial Codes are:

Major Group 26: Paper and Allied Products; Industry
Group No. 262; Industry No. 2621: Paper Mills

The Standard Classification Codes are:

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

C. Process and Controls

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

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

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

II. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 17-2 and 17-4.

The application packages were deemed complete on January 26, 1988.

The existing mill is located in the area of Duval County that has been designated nonattainment for PM according to FAC Rule 17-2.410(2)(a)2.

The existing mill is a major emitting facility in accordance with FAC Rule 17-2.100(111) for the pollutant PM.

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

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

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

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

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

Table 1

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

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

- o TRS - emission standard is 0.048 lb/3000 lbs BLS pursuant to FAC Rule 17-2.600(4)(c)4.a.
 - a. #1: 51,500 lbs/hr BLS 27,000 lbs/hr GLS
 - b. #2: 65,900 lbs/hr BLS 34,532 lbs/hr GLS
 - c. #3: 65,900 lbs/hr BLS 34,532 lbs/hr GLS
 (GLS - green liquor solids)

o Annual hours of operation are 8760

Since the SDTs are not being modified, the emissions of TRS are not subject to review pursuant to FAC Rule 17-2.500, Prevention of Significant Deterioration (PSD), and the emissions of PM are not subject to review pursuant to FAC Rule 17-2.510, New Source Review for NAA. Therefore, the emissions of PM and TRS are subject to review pursuant to FAC Rule 17-2.520, Sources Not Subject to PSD or NAA Review.

The SDTs are subject to the provisions of FAC Rules 17-2.600(4)(c)4.a. and 17-2.600(4)(c)4.b. According to FAC Rule 17-2.600(4)(c)4.a., the emission limiting standard is 0.048 pound per each 3000 pounds black liquor solids as hydrogen sulfide (H₂S). According to FAC Rule 17-2.600(4)(c)4.b., the SDTs shall be in compliance with FAC Rule 17-2.710, Continuous Emission Monitoring, and FAC Rule 17-2.960(1), Compliance Schedules, except where more restrictive requirements are imposed in the Consent Order, OGC Case No. 86-1405.

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

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

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

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

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

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

III. Summary of Emissions

A. Emission Limitations

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

Table 2

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

Note: See Table 1's Note for rationale

The emission limiting standards/limits are consistent with the applicable requirements pursuant to FAC Rules 17-2 and 17-4 and what was requested by the applicant and accepted by the DER's BAQM and Duval County's BESD.

B. Air Quality Analysis

From a technical review of the application packages and supplementary material, an air quality analysis was not required.

IV. Conclusion

The applicant submitted applications for construction permits in order to comply with the TRS Rules contained in FAC Rule 17-2 and to install control systems that will provide compliance with the TRS, PM and visible emission limiting standards applicable to these sources. The applicant requested more restrictive PM emission limits for each SDT than what FAC Rule 17-2 would require and the DER's BAQM and Duval County's BESD accepts the requests and feels that the limits are achievable. Consideration was given to the applicant on establishing the maximum process capacity of raw materials and chemicals for each SDT and its associated RB because of the accelerated final compliance date pursuant to the Consent Order, OGC Case No. 86-1405.

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

The General and Specific Conditions listed in the proposed permits (attached) will ensure compliance with all applicable requirements of FAC Rules 17-2 and 17-4.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

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

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

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

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

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

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

1. The smelt dissolving tank (SDT) may operate continuously (i.e., 8760 hrs/yr).
2. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H₂S) shall not exceed 0.048 pound per 3000 pounds black liquor solids (0.82 lb/hr or 3.6 tons/yr and based on a projected maximum processing capacity of 51,500 lbs/hr black liquor solids (BLS) in the No. 1 recovery boiler (RB) - equivalent to 27,000 lbs/hr green liquor solids (GLS)).

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

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

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

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

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

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

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141795
Expiration Date: August 10, 1988

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141795
Expiration Date: August 10, 1988

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141795
Expiration Date: August 10, 1988

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141795
Expiration Date: August 10, 1988

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

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

2. Total reduced sulfur emissions (TRS) as hydrogen sulfide (H₂S) shall not exceed 0.048 pound per 3000 pounds black liquor solids (1.05 lbs/hr or 4.6 tons/yr and based on a projected maximum processing capacity of 65,900 lbs/hr black liquor solids (BLS) in the No. 2 recovery boiler (RB) - equivalent to 34,532 lbs/hr green liquor solids (GLS)).

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141795
Expiration Date: August 10, 1988

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141795
Expiration Date: August 10, 1988

SPECIFIC CONDITIONS:

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

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

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

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

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

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

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

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

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

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

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

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

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: August 10, 1988

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: August 10, 1988

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: August 10, 1988

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: August 10, 1988

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

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

2. Total reduced sulfur emissions (TRS) as hydrogen sulfide (H₂S) shall not exceed 0.048 pound per 3000 pounds black liquor solids (1.05 lbs/hr or 4.6 tons/yr and based on a projected maximum processing capacity of 65,900 lbs/hr black liquor solids (BLS) in the No. 3 recovery boiler (RB) - equivalent to 34,532 lbs/hr green liquor solids (GLS)).

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: August 10, 1988

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

9. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4. ^{2-24-88 insert and will provide proof of compliance}

PERMITTEE:
Seminole Kraft Corporation

Permit Number: AC 16-141796
Expiration Date: August 10, 1988

SPECIFIC CONDITIONS:

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

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

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

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

2-24-88 insert filling an app. for
If the construction permit expires prior to the permittee obtaining a permit to operate, then all activities at the project must cease. (FAC Rule 17-4)

2-24-88 insert pursuant to FAC Rule 17-2.100(1)(B), Modification
14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours shall be submitted for approval to the BAQM office and the BESD office.

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

ATTACHMENT 1

Available Upon Request.

ATTACHMENT 2

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

December 10, 1987



DER
DEC 10 1987
BAQM

Mr. Clair Fancy P.E.
Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Office Bldg.
Tallahassee, Florida 32077

Re: Seminole Kraft Corporation
TRS Construction Permit Applications

Dear Mr. Fancy:

Bio-Environmental Services Division provides the following comments on the captioned permits:

Lime Kiln Nos. 1, 2, and 3

Section III A

The requested process input rates are higher than the current operation permits limits. Testing at the actual maximum capacity should be performed prior to issuance of the construction permits.

Section III B

What is dry basis? Please clarify.

Section III C

Show the emission calculations. Note: On Lime Kiln Nos. 2 and 3 the given maximum allowable and maximum actual emissions are less than the calculated emissions using the process weight table. This point should be clarified.

Section III E

The heat input for each of the three kilns is listed as 60×10^6 BTUs per hour, however, the process input rate on Kiln Nos. 2 and 3 is approximately 33% higher than on Kiln No. 1. Please clarify.

Smelt Dissolving Tank Nos. 1, 2, and 3

Section III A

The requested input rates are higher than the current operation permit limits. Testing at the maximum actual capacity should be performed prior to issuance of the construction permits. It is also noted that the application indicates the utilization rate of molten smelt. The allowable emissions for particulate matter and TRS are based upon the black liquor solids input to the recovery boiler and not the smelt input to the smelt dissolving tank. This point should be clarified.



Section III C

Show the emission calculations.

Section III D

A revised operation and maintenance plan should be submitted with the operation permit application.

Multiple Effect Evaporator Line Nos. 1, 2, and 3

Applications are satisfactory.

Batch Digester System Nos. 1 and 2

Section III C

Costs of the pollution control systems are incorrectly totaled. Please correct.

Section III A

The maximum capacity for each system should be given. This is required by Rule 17-2.960 Florida Administrative Code (FAC).

Section III C

What is the maximum process input rate and maximum product weight?

Section III H

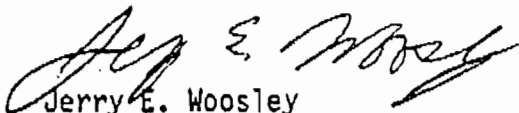
The operating characteristics of the non-condensable gas systems should be provided. This is needed to check the capability of the systems to capture and transport the digester system emissions to the lime kiln(s).

Attachment A

Will Lime Kiln No. 1 be used for NCG incineration? If so please provide documentation indicating the capabilities of Lime Kiln No. 1 to accommodate the NCG gases.

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

Very truly yours,



Jerry E. Woosley
Associate Pollution Control Engineer

JEW/ecr

cc: Mr. Bill Stewart, P.E., DER
Mr. Mike Riddle, Seminole Kraft Corp.
BESD File 2155-A
Disc 1, 45

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES

Bio-Environmental Services Division
Air and Water Pollution Control

December 10, 1987



DER

DEC 10 1987

BAQM

Mr. Claire Fancy, P.E.,
Department of Environmental Regulation
2500 Blair Stone Road
Twin Towers Office Bldg.
Tallahassee, Florida 32077

Re: Jefferson Smurfit Corporation
TRS Construction Permit Applications

Dear Mr. Fancy:

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

Smelt Dissolving Tank

Section III A

Does the given smelt process weight (96,240 lbs/hr) correspond to the recovery boiler process weight (137,500 lbs/hr black liquor solids) or the previous recovery boiler process weight (120,000 lbs/hr black liquor solids)?

The applicable rule for the SDT particulate matter emissions is 17-2.650(2)(c)10., Florida Administrative Code (FAC). The same rule is applicable for visible emissions.

It is noted that the requested particulate matter emission rate is significantly lower than the rate which is derived using the equation found in the referenced rule. If Jefferson Smurfit Corporation (JSC) desires a lower particulate matter limit it must be understood that the limit cannot be increased at a later date without a modification permit. The potential emissions should be reported as uncontrolled emissions in accordance with the permit application procedures.

Recovery Boiler

Section III A

At what percent moisture are the black liquor solids fired? What is dry?

Section III C

It is noted that the allowable particulate matter emission rate calculated using the correct standard (3 lbs/3000 lbs black liquor solids fired) is 137.5 lbs/hr. based upon the requested operating rate. If JSC desires a lower particulate matter limit it must be understood that the limit cannot be increased at a later date without a modification permit. The potential emissions should be reported as uncontrolled emissions in accordance with the permit application procedures.

Section III E

Are black liquor and fuel oil fired simultaneously at the given rates?

Digester System

Attachment B, Section I A and B

Do the figures in A represent the maximum hourly capacity and the figures in B the maximum hourly average based on maximum daily input? This item should be clearly explained.

General Comments

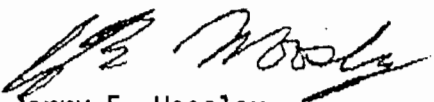
The construction permit applications definitely request higher operating capacities than are currently permitted. In accordance with the agreement reached in the November 4, 1987 meeting in Tallahassee (concerning the permit applications), testing for demonstrating highest existing capacity of a unit should be performed at a minimum of 96% of the maximum capacity. This testing is essential in establishing the actual capacities of the units. It is strongly urged that testing at these rates be done prior to issuance of any construction permit.

It is noted from the literature provided that the modifications proposed for the Recovery Boiler will allow increases in production capacity through increased efficiency and higher furnace operating rates. This literature further supports the need for establishing the maximum capacities of the units at this time.

In addition to the capacity increase the literature indicates a prime environmental benefit of a significant reduction in furnace generated TRS (below 3 ppm). This modification coupled with the recently installed molecular oxygen system on the black liquor oxidation system should allow JSC to consistently maintain TRS emissions at or below the 5 ppm level. In furtherance of a good faith effort by JSC and an opportunity to reduce allowable TRS emissions by an additional 70 tons per year it is requested that the JSC agree to the 5 ppm emission limit in the construction permit. The technology review presented in the permit application appears to make this option feasible.

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

Very truly yours,



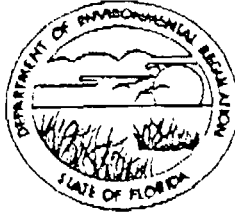
Jerry E. Woosley
Associate Pollution Control Engineer

JEW/ecr

cc: Mr. Bill Stewart, P.E., DER
Mr. Gene Tonn, P.E., JSC
BESD 1010 A
Disc 1, 46

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER
GARY L. SHAFFER
ASSISTANT DISTRICT MANAGER

FAX TRANSMITTAL LETTER

Date Sent: 12/10/87

TO:

Name: Clair Fancy, P.E.

Agency: BAQM DER

FAX Phone Number: _____

Number of pages (including this cover sheet): 5

FROM:

Jacksonville District

Transmitted on a Hitachi HIFAX 35; FAX phone number:
(904) 396-6196. This is a dedicated line.

If you have any questions please call Suncom 826-4200
or (904) 798-4200 and ask for _____.

Please call immediately if any of these pages are not
clearly received.

Senders name: Jerry Woosley

Remarks: Route to Pradeep Raval - CAPS

ATTACHMENT 3

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

December 11, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. T. Frank Lee
General Manager
Seminole Kraft Corporation
9469 Eastport Road
Post Office Box 26998
Jacksonville, Florida 32218-0998

Dear Mr. Lee:

Re: Completeness Review of Applications to Construct
AC 16-141790, -141792, -141793, -141794, -141795, -141796,
-141798, -141799, -141800 and -141801

The Department received your cover letter and above referenced applications, dated November 11, 1987, on November 12, 1987. Based on a technical review of these applications, they have been deemed incomplete. Therefore, please submit to the DER's Bureau of Air Quality Management (BAQM) office, including all assumptions, calculations and reference material, the following information so their status can, again, be ascertained:

1. For reference purposes, the assigned permit numbers and sources are:
AC 16-141790 No. 1 Lime Kiln
-141792 No. 2 Lime Kiln
-141793 No. 3 Lime Kiln
-141794 No. 1 Smelt Dissolving Tank (SDT)
-141795 No. 2 SDT
-141796 No. 3 SDT
-141798 Nos. 1 & 2 Digester Systems
-141799 No. 1 Multiple Effect Evaporator (MEE) System
-141800 No. 2 MEE System
-141801 No. 3 MEE System
2. Since September 24, 1976, has there been any physical changes to or change in the method of operation to any of the sources in the above referenced applications? Please document any change(s) and their associated cost(s).

Mr. T. Frank Lee
Page Two
December 11, 1987

3. What lime kiln will be designated as the primary combustion source for incinerating the TRS gases that will be collected and transported by the noncondensable gas (NCG) handling system? Secondary source, etc.?
4. Will a lime kiln be used to incinerate any TRS gases from the NCG handling system while in a non-processing mode of operation? If so, please explain.
5. Until the Interim Operation Permits (IOP) have been amended, the affected sources' proposed increases in the raw materials and chemicals, product weight, and pollutant emissions above the IOP capacities will subject the facility to new source review for both prevention of significant deterioration (PSD) and nonattainment areas pursuant to Florida Administrative Code (FAC) Rules 17-2.500(5) and 17-2.510(4), respectively. Therefore, please provide the DER's BAQM office and the Duval County's Bio-Environmental Services Division (BESD) office with test results and pertinent documentation to provide reasonable assurance that each source, in its current state, can achieve the maximum process capacity of raw materials and chemicals and product weight requested in the above referenced applications and comply with the emission limiting standards in FAC Rule 17-2, and includes the Nos. 1, 2 and 3 Recovery Boilers.
6. Please provide an ambient air quality standards (AAQS) analysis and a PSD maximum concentration increase (increment) analysis for all pollutants which have a facility-wide PSD significant net emissions increase. These analyses should be sufficient to give the Department and BESD reasonable assurance that the net emissions increase will not cause or contribute to any AAQS or increments violation.
7. Please address all of the concerns listed in the attached letter from the BESD office. If there are any repetitive questions, please just provide the one answer and acknowledge the citing in your response.

Mr. T. Frank Lee
Page Three
December 11, 1987

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

Sincerely,



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

CHF/BM/bm

Attachment

cc: K. Mehta, BESD
B. Pittman, Esq.
J. McKinnon, P.E., SCC

ATTACHMENT

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

December 10, 1987



Mr. Clair Fancy P.E.
Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Office Bldg.
Tallahassee, Florida 32077

DER

DEC 10 1987

BAQM

Re: Seminole Kraft Corporation
TRS Construction Permit Applications

Dear Mr. Fancy:

Bio-Environmental Services Division provides the following comments on the captioned permits:

Lime Kiln Nos. 1, 2, and 3

Section III A

The requested process input rates are higher than the current operation permits limits. Testing at the actual maximum capacity should be performed prior to issuance of the construction permits.

Section III B

What is dry basis? Please clarify.

Section III C

Show the emission calculations. Note: On Lime Kiln Nos. 2 and 3 the given maximum allowable and maximum actual emissions are less than the calculated emissions using the process weight table. This point should be clarified.

Section III E

The heat input for each of the three kilns is listed as 60×10^6 BTUs per hour, however, the process input rate on Kiln Nos. 2 and 3 is approximately 33% higher than on Kiln No. 1. Please clarify.

Smelt Dissolving Tank Nos. 1, 2, and 3

Section III A

The requested input rates are higher than the current operation permit limits. Testing at the maximum actual capacity should be performed prior to issuance of the construction permits. It is also noted that the application indicates the utilization rate of molten smelt. The allowable emissions for particulate matter and TRS are based upon the black liquor solids input to the recovery boiler and not the smelt input to the smelt dissolving tank. This point should be clarified.



Section III C

Show the emission calculations.

Section III D

A revised operation and maintenance plan should be submitted with the operation permit application.

Multiple Effect Evaporator Line Nos. 1, 2, and 3

Applications are satisfactory.

Batch Digester System Nos. 1 and 2

Section III C

Costs of the pollution control systems are incorrectly totaled. Please correct.

Section III A

The maximum capacity for each system should be given. This is required by Rule 17-2.960 Florida Administrative Code (FAC).

Section III C

What is the maximum process input rate and maximum product weight?

Section III H

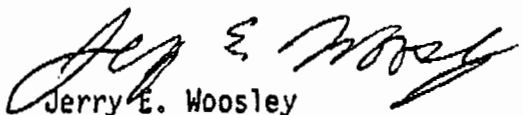
The operating characteristics of the non-condensable gas systems should be provided. This is needed to check the capability of the systems to capture and transport the digester system emissions to the lime kiln(s).

Attachment A

Will Lime Kiln No. 1 be used for NCG incineration? If so please provide documentation indicating the capabilities of Lime Kiln No. 1 to accommodate the NCG gases.

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

Very truly yours,



Jerry E. Woosley
Associate Pollution Control Engineer

JEW/ecr

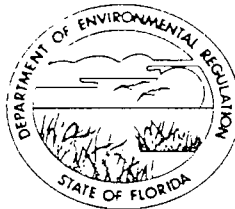
cc: Mr. Bill Stewart, P.E., DER
Mr. Mike Riddle, Seminole Kraft Corp.
BESD File 2155-A
Disc 1, 45

ATTACHMENT 4

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
904/786-4200



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER
GARY L. SHAFFER
ASSISTANT DISTRICT MANAGER

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

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

DER
JAN 04 1988
BAQM

Dear Mr. Lee:

The Bio-Environmental Services Division (BESD) and the Department of Environmental Regulation (DER) have reviewed the above captioned document and the appropriate attachments concerning maximum capacities of various pollution sources at the mill. The following comments and questions are provided:

1. Please explain the difference between air dried pulp (ADP) and machine dried pulp (MDP)? Please indicate what the relationship is between these terms.
2. On the amendments to the Recovery Boiler applications, please indicate the percent moisture in Section III B, on each application. Provide the emission calculations which support the emission rates presented in Section III C.
3. On the amendments to the Smelt Dissolving Tank applications please provide the black liquor solids input on the corresponding recovery boiler since the particulate emission rate is predicated upon this rate. In Section III C, please provide the emission calculation supporting the emission rates in columns 1 and 3, Section III C.
4. On the amendments to the Batch Digester Systems applications, please indicate the maximum capacity of each unit and not the average operating condition input rates.

The lbs/hr of TRS generated by the digesting systems should be provided. What is the expected increase in sulphur dioxide emissions from the lime kilns due to the oxidation of the reduced sulphur compounds?

5. On the amendments to the Multiple Effective Evaporator Systems what are expected TRS emissions on a lbs/hr basis from the hot wells? What is the expected increase in sulphur dioxide emissions from the lime kilns due to the oxidation of the reduced sulphur compounds?

Mr. T. Frank Lee
Page 2

6. On the amendments to the Lime Kiln applications, please indicate what is dry basis? Provide emission calculations supporting the emission rates found in columns 1 and 3, Section III, C.

In reference to the letter from Mr. Terry Cole to Mr. Mark Zilberberg dated November 5, 1987, the suggested language suggested for a specific condition is not appropriate. The purpose of the discussions concerning "capacity" is to state on the permit what the maximum operating capacity of each unit is at the existing configuration of each unit. This language allows operation on a unit at a higher level which does not provide reasonable assurance based upon test results that a source is in compliance nor has the question of maximum capacity been answered. It is not the desire of the Department nor BESD to limit operation of the units in questions so as to arbitrarily reduce production or economic benefit, however, each unit does have a maximum capacity and that is required on each permit.

The Department and BESD have agreed to allow testing to determine the existing maximum capacity of each unit. In order to determine this maximum and proceed with the issuance of the interim operation permits it is requested that testing be scheduled for each unit for which an increase of the permitted capacity is requested. Appropriate notification of the tests should be provided to the BESD and testing should be accomplished on or before January 31, 1988. The test reports should be submitted to BESD as soon as possible thereafter but no later than 45 days after the test. Hopefully this procedure will allow an expeditious resolution of these matters.


Your response to the questions above on or before December 31, 1987 is appreciated.

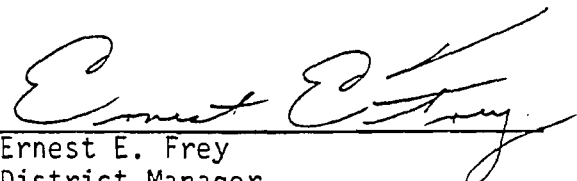
If you have any further questions concerning this matter, please contact Mr. Khurshid Mehta or Mr. Jerry Woosley at (904) 630-3210.

Very truly yours,

City of Jacksonville
Bio-Environmental Services Division

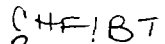
State of Florida
Dept. of Environmental Regulation


Donald C. Bayly
Interim Deputy Director


Ernest E. Frey
District Manager

 DCB/EEF/ecr

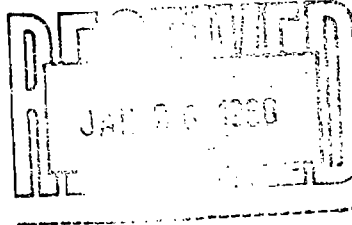
cc: BESD File 2155
Disc 2, 25
~~Mr. Clair Fancy, P.E., DER~~

Copied:  BT
Bruce Mitchell }
Pradeep Raval } 1.4.88

ATTACHMENT 5

Hand Delivered
1-26-88File Copy**Seminole Kraft Corporation**

Jacksonville Mill

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

904 751-6400

January 22, 1988

DERJAN 26 1988 *REN***BAQM**

Mr. C.H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management.
Florida Dept. of Environmental Regulation
2600 Blair Road
Tallahassee, FL 32301

Subject: Response to Florida DER Incompleteness Letter
of 12-11-87

Dear Mr. Fancy:

This is in response to your letter of December 11, 1987 which deemed our TRS control construction permits to be incomplete. This letter will provide answers to those questions posed by the Department which are applicable to these applications.

DER Question #1 - Not applicable, just a listing of assigned permit numbers.

DER Question #2 - Seminole Kraft does not believe the Department has authority within the context of these TRS construction permits to request this information. However, in the interest of cooperation we will answer this question. There have been no physical changes or changes in the method of operation of any of the sources in the referenced applications except maintenance of various process equipment and the tie in of the non-condensable gases from the evaporator hot wells which took place with the Department's approval in October, 1987. The information requested regarding this latter change is contained in the construction permits for the evaporators previously submitted.

DER Question #3 - We believe the #2 and #3 lime kilns have equal capability to incinerate the TRS gases.

Mr. C.H. Fancy
Florida DER
Page 2

DER Question #4 - The lime kilns will not be used for incinerating the TRS gases while in a non-processing mode.

DER Question #5 - We plan to run compliance tests at or near the operating rates stated in the applications and will provide those results as soon as available. Where appropriate, we will accept operating rates at which we can demonstrate compliance if compliance cannot be demonstrated at operating rates within 90% of the operating rates stated in the applications per Florida DER regulations. However, we would like to note that these sources have the ability to operate at higher capacity for short periods of time.

DER Question #6 - There will be no net emissions increase as a result of the changes contemplated in these construction permit applications. Therefore, an ambient air quality analysis and a PSD maximum concentration increase (increment) analysis is not required.

DER Question #7 - This refers to a letter from BESD with a series of questions.

Lime Kiln Nos. 1, 2 & 3

Section III A - As indicated in our answer to DER Question #5.

Section III B - Dry basis means dry solids without associated water.

Section III C - See Attachment A for calculations.

Section III E - Because the #1 lime kiln is shorter, it requires more BTU's per ton of lime to get the job done.

Smelt Dissolving Tank No.s 1, 2 & 3

Section III A - As indicated in our answer to DER Question #5. Also, with respect to BESD's point that particulate and TRS emission limits from these sources should be based on black liquor solids; we disagree. While the TRS emissions limit for these sources is based on black liquor solids, the particulate emissions have traditionally been based on molten smelt through the smelt tank.

Mr. C.H. Fancy
Florida DER
Page 3

Section III C - See Attachment B for calculations.

Section III D - A revised operation and maintenance plan will be prepared in conjunction with an operation permit application for this source at a later date.

Batch Digester System No.1 & 2

Section II C - The costs should have read as follows:

NCG System Upgrade	\$ 65,000
Computer Control System	<u>1,185,000</u>
TOTAL	\$1,250,000

Section III A - Florida DER previously determined that this is one system so the maximum capacity is for the total of both systems and was provided as indicated in Section III A of application.

Section III C -

Total Process Input Rate (lb/hr) = 1,478,000 lbs/hr
Product weight (lb/hr) = 165,583 lbs AD Pulp/hr

III H - Based on previous discussions with DER the emission point for the non-condensable gas system, should be provided here. This is the lime kilns and the information can be found at Section III-H on the lime kiln applications.

Attachment A

Lime Kiln #1 will not be used for NCG incineration.

Seminole Kraft believes this response and the information contained herein should be more than adequate to allow the Department to deem our TRS construction permit applications complete. Hence, we urge the Department to issue construction permits for these sources as soon as possible so that Seminole Kraft can proceed with installation of these additional TRS control measures. We must also point out

Mr. C.H. Fancy
Florida DER
Page 4

that the Consent Order executed by BESD, Florida DER and Seminole Kraft Corporation requires that certain of these improvements be complete in the very near future. They are:

<u>Item</u>	<u>Final Compliance Dates</u>
Smelt Dissolving Tanks	May, 1988
ME Evaporators	August, 1988

As you know, the evaporators have already, with the Department's approval, been completed. However, the smelt tanks' construction must begin in the near future to meet the May final compliance date. Accordingly, we request the Department provide expedited handling of this permit so that the final Consent Order compliance date is not put in jeopardy.

Finally, we note that a change in the Department's rules indicate that potential emissions are now after the control equipment and, hence, we submitted more in permit fees than was necessary. Accordingly, we now believe the proper fees should have been as shown below and we request the Department refund the amount shown.

<u>Source</u>	<u>Fee Submitted</u>	<u>Actual Required</u>
No.1 Dissolving Tank	\$ 1,000	\$ 100
No.2 Dissolving Tank	1,000	100
No.3 Dissolving Tank	1,000	100
No.1 & 2 Batch Digestor	1,000	100
No.1 Line Multi Effect Evap.	1,000	100
No.2 Line Multi Effect Evap.	1,000	100
No.3 Line Multi Effect Evap.	1,000	100
No.1 Lime Kiln	1,000	100
No.2 Lime Kiln	1,000	100
No.3 Lime Kiln	1,000	100
	<u>\$10,000</u>	<u>\$1,000</u>
Refund Due:	\$ 9,000	

Mr. C.H. Fancy
Florida DER
Page 5

Please send a refund check made payable to Seminole Kraft Corporation to David P. Ledbetter, Seminole Kraft Corporation, 9469 Eastport Road, P.O. Box 26998, Jacksonville, Florida 32218-0998.

Sincerely,

SEMINOLE KRAFT CORPORATION



T. Frank Lee
General Manager

ah

CC: Mr. Ernest Frey - Florida DER ✓
Mr. Donald Bayly - BESD
Mr. Jerry Woosley - BESD ✓
Mr. John Millican
Mr. Terry Cole
Mr. Malcolm Williams
Mr. Mike Riddle
Mr. Curt Barton

Bruce Mitchell } 1-27-88 RR
CHF/BT
Pruder, Royal

ATTACHMENT A

Lime Kiln Emissions

Particulate Emissions

Allowable - Based on $E = 3.59P^{0.63}$ at process weight indicated in original operation permit application. We are accepting these original limits to avoid an emission increase.

$$\#1 \text{ Kiln} - E = 3.59 (11.09)^{0.62} = 16 \text{ lb/hr}$$

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

$$\#3 \text{ Kiln} - E = 3.59 (11.17)^{0.62} = 16 \text{ lb/hr}$$

Potential Emissions - Based on original potential emissions submitted by Jacksonville Kraft.

ATTACHMENT B

Smelt Dissolving Tank Emissions

Particulate Emissions

Allowable - Based on $E = 3.59P^{0.62}$ at process weight indicated in the original operation permit application. We are accepting these original limits to avoid an emission increase.

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

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

$$\#3 \text{ Dissolver} - E = 3.59 (14.52)^{0.62} = 18.9 \text{ lb/hr}$$

Note: Calculation in original application had a typo and indicated allowable on #2 and #3 dissolver was 18.6. Those allowable emissions shown above are correct. This change should be reflected on the interim operating permits.

Potential Emissions - Based on original potential emissions submitted by Jacksonville Kraft.

TRS EMISSIONS

Allowable - Based on 0.048 lb/3000 #BLS and process rates shown for each Recovery Boiler.

$$\#1 \text{ Dissolver} - \frac{0.048 \text{ lb}}{3000 \text{ \#BLS}} \times \frac{51,500 \text{ lb BLS}}{\text{hr}} = .82 \text{ lb/hr}$$

$$\#2 \text{ Dissolver} - \frac{0.048 \text{ lb}}{3000 \text{ \#BLS}} \times \frac{65,900 \text{ lb BLS}}{\text{hr}} = 1.05 \text{ lb/hr}$$

$$\#3 \text{ Dissolver} - \frac{0.048 \text{ lb}}{3000 \text{ \#BLS}} \times \frac{65,900 \text{ lb BLS}}{\text{hr}} = 1.05 \text{ lb/hr}$$

ATTACHMENT 6



23 Oct. 87
Atlanta, GA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4APT-AC

OCT 23 1987

Mr. William A. Thomas, P.E., Administrator
Central Air Permitting
Florida Department of Environmental
Regulation
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
OCT 26 1987
BAQM

Dear Mr. Thomas:

As requested in your letter of September 24, 1987, we have reviewed the planned renovations to the No. 6 Recovery Furnace at St. Joe Paper Company's Port St. Joe, Florida facility. The planned renovation for the No. 6 Recovery Furnace includes: increasing the firing rate from 900,000 lb per day of black liquor to 1,200,000 lb per day; replacing the direct contact evaporator with an indirect contact evaporator; renovating the wet-bottom ESP to increase particulate removal efficiency; and renovating the wet-bottom portion of the ESP.

Your letter contained various statements and conclusions regarding the possible application of New Source Performance Standards (40 CFR Part 60, Subpart BB) and Prevention of Significant Deterioration (PSD) to the recovery furnace after it has been renovated. We are providing the following response regarding your conclusions.

Applicability of 40 CFR Part 60, Subpart BB

An existing facility can become subject to the applicable provisions of New Source Performance Standards (NSPS) if it is either modified or reconstructed. Modification is addressed in 40 CFR §60.14, which states that any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification. Reconstruction is defined in 40 CFR §60.15. In order for an existing facility to be considered reconstructed, the fixed capital cost of the new (replacement) components must exceed 50 percent of the fixed capital cost of a comparable, entirely new facility.

Based on the information provided and in the literature, we believe that the Total Reduced Sulfur (TRS) emission rate from the recovery furnace should decrease. Therefore, the facility would not become subject to the TRS standard of Subpart BB because a modification would not have occurred.

Removing the direct contact evaporator and increasing the firing rate of the recovery furnace will increase the amount of particulate to the ESP, however, the renovated ESP should have a higher particulate removal efficiency. This combination makes it unclear whether the particulate emission rate will increase, decrease, or remain the same.

St. Joe Paper Company's basis for demonstrating a decrease in the particulate emission rate is not acceptable. Their estimate of the particulate emission rate before renovation is based on the current particulate standard for the No. 6 Recovery Furnace. Previous test data (July 26, 1976) indicates that the actual particulate emission rate was 14 percent of the standard. This indicates that an increase in the particulate emission rate will occur after renovation if the renovated ESP emits particulate at the level that the ESP vendor guarantees.

A determination of the applicability of the particulate emission standard of 40 CFR Part 60, Subpart BB because of modification can only be made by a comparison of test data from before and after the renovation. Although St. Joe Paper Company contends that test data obtained before the renovation is not valid because the test methods utilized did not meet today's criteria in Method 5, we believe that the test data generated from these tests are the best estimate of actual emissions before the renovation. When tests are conducted after the renovation, we propose that the test method that was utilized before the renovation be employed so that comparable results can be obtained. For example, if aluminum thimbles were used to collect particulate during the tests before the renovation then they should be utilized for the tests after the renovation. This testing methodology would be used only for comparative purposes and not for compliance determinations.

The information provided to substantiate that reconstruction (as defined in 40 CFR §60.15) will not occur is not acceptable since we could not determine the exact cost basis for the estimate. The December 16, 1985, preamble to the reconstruction regulations defines fixed capital cost as the capital needed to provide all the depreciable components, including the costs of engineering, purchase and installation of major process equipment, contractor fees, instrumentation, auxiliary facilities, buildings and structures. In addition, costs associated with the purchase and installation of air pollution control equipment are only included in the fixed capital cost to the extent that the equipment is required as part of the manufacturing/operation process. The reconstruction regulation also specifies that the entirely new facility must be comparable to the planned renovated facility.

The fixed capital cost of the renovated recovery furnace and the entirely new facility must be detailed and revised to include the items referenced above. In addition, we request that the cost of retrofitting the wet-bottom ESP and a comparable entirely new wet-bottom ESP be included as separate cost items. The cost associated with the wet-bottom ESP may be included in the fixed capital costs if it is determined that it is required as part of the operating process.

The fixed capital cost for the entirely new facility included the cost of a cascade evaporator (direct contact evaporator). This cost can not be used because the planned renovated facility will not include a cascade evaporator.

When you receive the revised reconstruction costs of the facility, we would appreciate the opportunity to review this information.

We are in agreement with you that an increase in the smelt feed rate to the smelt tanks does not necessarily make the smelt tanks subject to NSPS. If the smelt tanks were originally designed to accommodate the higher feed rate then the smelt tanks would not be considered modified. However, Mr. Mike Harley of your office indicated that the practice of recirculating green liquor back to the smelt tanks will cease in order to accommodate the increased smelt feed rate. We view this as an operational change (as cited in 40 CFR §60.14) to the smelt tanks. Therefore, the smelt tanks will become subject to 40 CFR Part 60, Subpart BB because the operational change will increase the TRS emission rate.

Increasing the design capacity of an existing facility does not necessarily subject the existing facility to NSPS. In order for the existing facility to become subject to NSPS, an increase in the actual (not allowable) emission rate of a pollutant to the atmosphere for which a NSPS standard applies would have to accompany the increase in the design capacity. Either AP-42 factors or actual emission tests can document the change in the emission rate. If the facility owner or operator does not inform you of the increase in design capacity of the facility and an increase in the actual emission rate of a regulated pollutant occurs, then the facility owner or operator would be in violation of NSPS from the time that the design capacity was increased.

Applicability of PSD Regulations

In your letter, you stated that the reactivation of the No. 6 recovery furnace will not trigger a full PSD review. EPA agrees in part with this determination.

It is current EPA policy that if a source can demonstrate, to the satisfaction of the Administrator, that the shutdown of a unit was not intended to be of a permanent nature, PSD review would not apply to that unit's reactivation. Recovery furnace No. 6 has been in cold standby for the last 9-1/2 years. However, the company has maintained a continuous state operating permit and has made it clear that the unit was not permanently shutdown. Therefore, the mere startup of recovery furnace No. 6 would not trigger new source review.

However, since the company is proposing to make physical and operational changes to recovery furnace No. 6 prior to reactivation, some change in previous emission levels may occur. It cannot be determined from the available information whether or not this modification would cause a "significant" net emissions increase and subject the renovated No. 6 recovery furnace to PSD requirements. In order to assess whether a major modification will occur, the increase in emissions over previous actual emission levels will need to be projected. For TRS, the new emissions change should be negative due to the increased capability of the recovery boiler to control TRS emissions and the removal of the direct contact evaporator. However, for particulate emissions, pre-shutdown test data should be compared to estimated post-startup emission levels. (Note that PM₁₀ emissions may also need to be addressed). In addition, the net emissions change for other pollutants

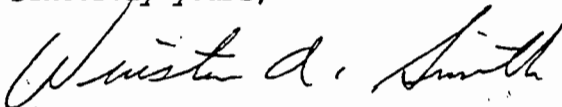
(SO₂, NO_x, CO, etc.) will have to be determined. The emissions changes associated with the appropriate smelt dissolving tank should also be included in the net emissions calculations. If a "significant" net emissions increase of any pollutant occurs as a result of the physical changes to the No. 6 recovery furnace, then PSD would apply to the reactivation/modification.

You stated in your letter that the PSD review for the No. 9 power boiler did not include emissions from the No. 5 or the No. 6 recovery furnaces. Since these two units were on cold standby at the time of the PSD application for the No. 9 power boiler, the actual emissions of these units were assumed to be zero and were not included in any ambient impact analyses. EPA guidance specifies that when modeling multi-source areas to determine compliance with short-term and annual ambient standards, nearby background sources should be modeled using the following: maximum allowable emissions, actual or design capacity (whichever is greater), and time periods which represent continuous operation. Even though both recovery furnaces No. 5 and No. 6 were not operating, they both had valid operating permits and should have been included in the PSD modeling for power boiler No. 9 at their allowable emission rates and design capacities.

In order to allow the reactivation of recovery furnaces No. 5 and No. 6, ambient analyses must be performed to validate the previous PSD review. If both recovery furnaces were in existence on the baseline date, these units would not contribute to increment consumption and therefore any increment modeling done in conjunction with the No. 9 power boiler's PSD application would be preserved. However, emissions from these two units will affect the results of the ambient standard analysis. As you have proposed in your letter, modeling analyses should be done for recovery furnaces No. 5 and No. 6 to ensure attainment of the ambient particulate standard. All changes in particulate emission levels due to the reactivation of these sources (including any increase from the modification of recovery furnace No. 6 and any increases from the smelt dissolving tanks) should also be included in the ambient analysis.

Thank you for the opportunity to review this source modification package. If we may be of further assistance to you or your staff, please contact us. Any questions regarding NSPS, may be addressed to Paul Reinermann at 404/347-2904. If you have any questions regarding PSD, please contact Janet Hayward at 404/347-2864.

Sincerely yours,



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

Copied: CHF / BT

Erica Mitchell

Mike Harley

Betsy Pittman / Mark Zilberberg

ATTACHMENT 7