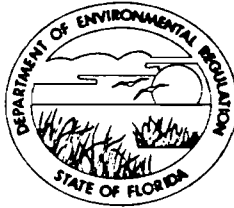


Reading

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



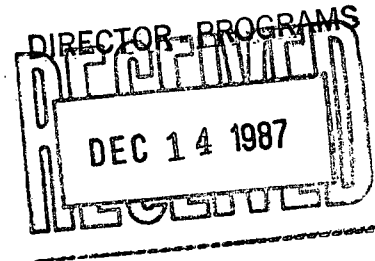
BOB MARTINEZ
GOVERNOR



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:

- 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
- 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

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

March 31, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED


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

Dear Mr. Lee:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permits for Seminole Kraft Corporation to make several changes at the existing mill in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2. The changes include replacement of some existing equipment, addition of some existing and new equipment, and upgrading the existing noncondensable gas (NCG) handling system. The NCG will be incinerated in either the No. 2 or 3 Lime Kiln.

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

Sincerely,


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

CHF/bm

Attachments

cc: B. Stewart, NE Dist.
C. Barton, SCC
J. McKinnon, P.E., SCC
B. Pittman, Esq.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Applications for Permits by:

Seminole Kraft Corporation
9469 Eastport Road
Jacksonville, Florida 32218

DER File No. AC 16-141790
AC 16-141792
AC 16-141793
AC 16-141798
AC 16-141799
AC 16-141800
AC 16-141801

INTENT TO ISSUE

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

The applicant, Seminole Kraft Corporation (SKC), applied on November 12, 1987, to the Department of Environmental Regulation for permits to make several changes at its existing facility in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code (FAC) Rule 17-2, which includes replacement of some existing equipment, addition of some existing and new equipment, and upgrading the existing noncondensable gas (NCG) handling system from various sources. The TRS NCG gases will be incinerated in either the No. 2 or 3 Lime Kiln. The location of the proposed project will be at SKC's existing facility in Jacksonville, Duval County, Florida.

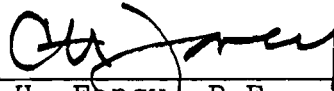
The Department has permitting jurisdiction under Chapter 403, Florida Statutes (F.S.), and FAC Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits were needed for the proposed work.

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

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

B. Stewart, NE Dist.
C. Barton, SCC
J. McKinnon, P.E., SCC
B. Pittman, Esq.

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

28-5.15 Requests for Formal and Informal Proceedings

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

CERTIFICATE OF SERVICE

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

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

Martha J. Wise March 31, 1988
Clerk Date

State of Florida
Department of Environmental Regulation
Notice of Intent

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

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

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

Technical Evaluation
and
Preliminary Determination

Seminole Kraft Corporation
Duval County
Jacksonville, Florida

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

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

March 31, 1988

I. Application

A. Applicant

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

B. Project Description and Location

The applicant made application for construction permits and to make several changes at its existing mill in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code (FAC) Rule 17-2, which includes the replacement of some existing equipment, addition of some existing and new equipment, and upgrading the existing noncondensable gas (NCG) handling system. The NCG is capable of being incinerated in lime kilns Nos. 2 or 3. Specifically, the following changes are proposed:

- o For the No. 1 Lime Kiln, a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up will be installed. The filter will be from the existing No. 3 Lime Kiln and is 8 feet in diameter and 10 feet long.
- o For the Nos. 2 and 3 Lime Kilns, a larger lime mud filter, larger vacuum system and new piping to provide hot fresh water to the filter shower and scrubber make-up will be installed. The new filters will be 10 feet in diameter and 14 feet long.
- o A computer control system will be installed in the pulp mill digester area to control and sequence the digester cooks and blows in the Nos. 1 and 2 Batch Digester Systems. This system will smooth out the flows of the NCG into the NCG system and will control the venting from the pressure relief valves on the blow tanks and blow heat accumulators.

The NCG system upgrade will consist of piping changes at the inlet of the induced draft fan to prevent condensate from entering the fan. The purpose is to improve fan reliability, eliminate condensate in the combustion air to the kiln(s), and improve combustion control.

- o For the Nos. 1-3 Multiple Effect Evaporator (MEE) Systems, a stainless steel sheet metal cover has been installed on each of the hotwells. Stack connections were made to the existing NCG handling system. This part of the project

was first connected as a trial run for feasibility and was successful.

The project will occur at the applicant's existing kraft pulp mill located in Duval County, Florida. The UTM coordinates are Zone 17, 744.18 km East and 3365.60 km North.

The Standard Industrial Codes are:

1. No. 2621 - Paper Mills

The Standard Classification Codes are:

1. Pulp and Paper Industry

Major Group 26: Sulfate (Kraft) Pulping

- o Batch Digester System 3-07-001-01 (tons ADUP)
- o MEE System 3-07-001-03 (tons ADUP)
- o Lime Kiln 3-07-001-06 (tons ADUP)

2. Mineral Products

Major Group 32: Lime Manufacture

- o Calcining-Rotary Lime Kiln 3-05-016-04 (tons prod.)

C. Process and Controls

The white/black liquor, or cooking liquor, is added to the wood chips in the digesters and cooked. At the end of the cooking cycle, the contents of the vessel(s) are blown to a tank at atmospheric pressure, flashing off steam and NCG. The NCG will be collected and transported to either the No. 2 or 3 Lime Kiln for incineration.

The spent liquor (black liquor) is then concentrated in the multiple effect evaporator system (Nos. 1-3). NCG emitted will be collected and transported to either the Nos. 2 or 3 Lime Kiln for incineration.

The spent lime cake (calcium carbonate) from the slaking cycle is recalined in a rotary lime kiln (Nos. 1-3) to produce quicklime for recausticing the green liquor. The particulate matter (PM), TRS, and visible emissions will be controlled with a wet scrubber control system. Sulfur dioxide (SO₂) emissions from the oxidation of the TRS NCG should be scrubbed out in the lime mud and the wet scrubber control system. A one time compliance test will be required to verify and establish the SO₂ removal efficiency.

II. Rule Applicability

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

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

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

The existing mill is a major emitting facility in accordance with FAC Rule 17-2.100(111) for the pollutants PM and SO₂.

Based on the applicant's response, the Nos. 1 and 2 Batch Digester Systems, the Nos. 1-3 MEE Systems, and the Nos. 1-3 Lime Kilns are existing non-NSPS (new source performance standards) sources.

As stated before, the batch digester systems and MEE systems are sources of TRS and the lime kilns are sources of PM, TRS and visible emissions. SO₂ emissions will be emitted unless the Nos. 2 and 3 Lime Kilns and their associated scrubber system have a removal efficiency of 100%. A one-time test for SO₂ will be required to establish the SO₂ removal efficiency of each lime kiln (Nos. 2 and 3). Also, a one-time test for SO₂ will be required on the No. 1 Lime Kiln, which uses sulfur laden fuel oil, to establish the SO₂ removal efficiency.

Since the mill is under a Consent Order, OGC Case No. 86-1405 (dated October 28, 1986), the Nos. 1-3 MEE Systems are required to be in final compliance by August 12, 1988, which is nine (9) months earlier than FAC Rule 17-2.960(1)(d)1. requires of existing MEEs. Currently, the Nos. 1-3 MEEs are already in compliance with the TRS regulations.

The Consent Order, OGC Case No. 86-1405, contains applicable conditions to the Nos. 1 and 2 Batch Digester Systems that apply to production and the NCG system (see #15).

The applicant requested a more restrictive PM mass emission limit for each lime kiln than what would be allowed pursuant to FAC Rule 17-2.610(1), because of issues associated with the PM nonattainment area (NAA) in Duval County and Duval County's Bio-Environmental Services Division (BESD).

The following table exhibits the projected potential pollutant emissions from the proposed project in tons per year:

Table 1

Source	Projected Potential Pollutant Emiss. (TPY)		
	PM	TRS	SO ₂
Nos. 1 & 2 Batch Digester Systems		0	
Nos. 1-3 MEEs		0	
Lime Kilns			
No. 1	70.1	8.15	0
No. 2	70.1	8.54	0
No. 3	70.1	9.02	0
Total:	210.3	25.71	

- Note:
- o Annual hours of operation are 8760
 - o Emissions for the Lime Kilns are based on:
 1. PM: Process Weight (FAC Rule 17-2.650(2)(c)9.)
 - a. #1 - 11.09 tons/hr lime mud processed (dry)
 - b. #2 - 11.17 tons/hr lime mud processed (dry)
 - c. #3 - 11.17 tons/hr lime mud processed (dry)
 2. TRS: 20 ppmvd @ std. conditions @ 10% O₂, 12-hr avg. (FAC Rule 17-2.600(4)(c)5.):
 - a. #1 - 29,100 acfm, 16,180 dscfm; 160°F, 35% H₂O; 9.0% O₂
 - b. #2 - 26,350 acfm; 16,321 dscfm; 150°F; 29% H₂O; 8.5% O₂
 - c. #3 - 22,275 acfm; 14,189 dscfm; 150°F; 26% H₂O; 6.0% O₂

Since the Nos. 1 and 2 Batch Digester Systems, the Nos. 1-3 MEE Systems and the Nos. 1-3 Lime Kilns, are not being modified, the emissions of TRS are not subject to review pursuant to FAC Rule 17-2.500, Prevention of Significant Deterioration (PSD), and the emissions of PM are not subject to review pursuant to FAC Rule 17-2.510, New Source Review for NAA. The emissions of SO₂ will be assumed to be zero and not subject to review pursuant to FAC Rule 17-2.500, PSD. Therefore, the emissions of PM and TRS are subject to review pursuant to FAC Rule 17-2.520, Sources Not Subject to PSD or NAA Review.

The Nos. 1 and 2 Batch Digester Systems and the Nos. 1-3 MEE Systems are subject to the provisions of FAC Rule 17-2.600(4)(c)1. Besides the emissions standard for TRS, which would be allowed and applicable if the applicant did not incinerate the NCG, the regulation contains the provision for establishing a contingency plan.

Pursuant to FAC Rule 17-2.960(1), Compliance Schedules, the Nos. 1 and 2 Batch Digester Systems are to be in final compliance by May 12, 1989.

The Nos. 1-3 Lime Kilns are subject to the provisions of FAC Rule 17-2.650(2)(c)9. for PM and visible emissions (VE). As stated previously, the applicant requested a more stringent PM emission limiting standard than what would be allowed by rule. The VE standard is 10% opacity or less.

The Nos. 1-3 Lime Kilns are subject to the provisions of FAC Rule 17-2.600(4)(c)5. According to FAC Rule 17-2.600(4)(c)5.a., the emission limiting standard is 20 ppm by volume on a dry basis at standard conditions corrected to 10 percent oxygen as a 12-hour average. According to FAC Rule 17-2.600(4)(c)5.b., the sources are subject to FAC Rules 17-2.710, Continuous Emission Monitoring, and 17-2.960(1), Compliance Schedules. Pursuant to FAC Rule 17-2.960(1)(d)3., the lime kilns are to be in final compliance by November 12, 1989.

Compliance tests for PM shall be conducted using EPA Method 5 or 17 in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Compliance tests for TRS shall be conducted using EPA Method 16 or 16A in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Compliance tests for VE shall be conducted using EPA Method 9 in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

The one-time compliance test for SO₂ shall be conducted using EPA Method 6 in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

All of the sources are subject to FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-2.130, Plant Operations-Problems. Any notification required should be made or sent to the BESD office.

All of the sources are subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-2.140, Reports.

In accordance with FAC Rule 17-2.620(2), objectionable odors shall not be allowed off plant property.

III. Summary of Emissions

A. Emission Limitations

The regulated pollutants from the proposed project are TRS and PM. A VE standard also exists for the lime kilns (Nos. 1-3). The following table exhibits the maximum allowable emission standard/limit for the Nos. 1-3 Lime Kilns.

Table 2

Source	Pollutant	Max. Allowable Pollutant Emission Standard/Limit
No. 1 Lime Kiln	PM	16.0 lbs/hr, 70.1 TPY
	TRS	20 ppmvd @ std. conditions @ 10% O ₂ , as a 12-hr avg. (1.86 lbs/hr, 8.2 TPY)
	VE	10% opacity or less
No. 2 Lime Kiln	PM	16.0 lbs/hr, 20.1 TPY
	TRS	20 ppmvd @ std. conditions @ 10% O ₂ , as a 12-hr avg (1.95 lbs/hr, 8.5 TPY)
	VE	10% opacity or less
No. 3 Lime Kiln	PM	16.0 lbs/hr, 20.1 TPY
	TRS	20 ppmvd @ std. conditions @ 10% O ₂ , as a 12-hr avg. (2.06 lbs/hr, 9.0 TPY)
	VE	10% opacity or less

See Table 1's note for rationale

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

B. Air Quality Analysis

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

IV. Conclusion

The applicant submitted applications for construction permits in order to comply with the TRS regulations contained in FAC Rule 17-2 and to make changes that will provide compliance with the TRS, PM and visible emission limiting standards applicable to these sources. The applicant requested more restrictive PM emission limits for each lime kiln than what FAC Rule 17-2 would allow and the DER's BAQM and Duval County's BESD accepts the requests and feel that the limits are achievable.

A one-time test for SO₂ will be used to establish the overall SO₂ removal efficiency of each lime kiln and their associated scrubber system (Nos. 1, 2 and 3). Because of the assumption that all of the oxidized TRS NCG (SO₂) will be scrubbed out in each of the Nos. 2 and 3 Lime Kilns and their associated scrubber systems, the potential SO₂ emissions are considered to be zero. The potential SO₂ emissions for the No. 1 Lime Kiln are considered to be zero from the firing of sulfur laden fuel oil, because the SO₂ emissions will be scrubbed out in the lime kiln and its associated scrubber system. An evaluation of the test results will also be used to rule out or require further review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received for each source.

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

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 16-141790
Expiration Date: March 27, 1990
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: No. 1 Lime Kiln

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

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

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

- A. Pulp and Paper Industry
 - Major Group: 26 Sulfate (Kraft) Pulping
 - o Lime Kiln 3-07-001-06
- B. Mineral Products
 - Major Group 32: Lime Manufacture
 - o Calcining-Rotary Lime Kiln 3-05-016-04

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

ATTACHMENTS

AC 16-141790

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

4. The maximum pollutant emissions shall not exceed:

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

5. Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700, ^{Verbally} and ~~40 CFR 60, Appendix A:~~ or other approved method by the Department

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

1. The lime kiln may operate continuously, i.e., 8760 hrs/yr.
2. The maximum lime production rate shall not exceed 12,200 lbs CaO/hr (dry) and is based on a total process input rate of 24,000 lbs/hr lime mud (dry).
3. The No. 6 Fuel Oil firing rate shall not exceed ~~400~~^{4-14-88 ✓} gals/hr ~~60~~ MMBtu/hr heat input. The sulfur content of the fuel oil shall not exceed 2.3% by weight.

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

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

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

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

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

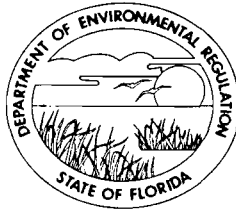
Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 16-141792
Expiration Date: March 27, 1990
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: No. 2 Lime Kiln

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

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

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

- A. Pulp and Paper Industry
 - Major Group: 26 Sulfate (Kraft) Pulping
 - o Lime Kiln 3-07-001-06
- B. Mineral Products
 - Major Group 32: Lime Manufacture
 - o Calcining-Rotary Lime Kiln 3-05-016-04

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

ATTACHMENTS

AC 16-141792

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

1. The lime kiln may operate continuously, i.e., 8760 hrs/yr.
2. The maximum lime production rate shall not exceed 16,300 lbs CaO/hr (dry) and is based on a total process input rate of 32,000 lbs/hr lime mud (dry).
3. The No. 6 fuel oil firing rate shall not exceed ~~400~~ gals/hr (60 MMBtu/hr heat input). The sulfur content of the fuel oil shall not exceed 2.3% by weight.

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

5. The maximum pollutant emissions shall not exceed:

- a) Particulate Matter (PM): 16.0 lbs/hr, 70.1 TPY
- b) Visible Emissions (VE): 10% Opacity or less
- c) TRS: 20 ppmvd @ standard conditions corrected to 10% O₂, as a 12-hr average (1.95 lbs/hr, 8.5 TPY)
- d) SO₂: assumed to be zero for PSD tracking purposes

6. Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 *+ verbiger* and ~~40-CFR-60, Appendix A~~.

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

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

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

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

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

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

12. The No. 2 Lime Kiln is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

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

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

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

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

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale 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: Permit Number: AC 16-141793
Seminole Kraft Corporation Expiration Date: March 27, 1990
P. O. Box 26998 County: Duval
Jacksonville, FL 32218-0998 Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: No. 3 Lime Kiln

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

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

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

- A. Pulp and Paper Industry
 - Major Group: 26 Sulfate (Kraft) Pulping
 - o Lime Kiln 3-07-001-06
- B. Mineral Products
 - Major Group 32: Lime Manufacture
 - o Calcining-Rotary Lime Kiln 3-05-016-04

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

ATTACHMENTS

AC 16-141793

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

1. The lime kiln may operate continuously, i.e., 8760 hrs/yr.
2. The maximum lime production rate shall not exceed 16,300 lbs CaO/hr (dry) and is based on a total process input rate of 32,000 lbs/hr lime mud (dry).
3. The No. 6 fuel oil firing rate shall not exceed 400 gals/hr (60 MMBtu/hr heat input). The sulfur content of the fuel oil shall not exceed 2.3% by weight.

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

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

5. The maximum pollutant emissions shall not exceed:

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

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corporation

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

SPECIFIC CONDITIONS:

13. The No. 3 Lime Kiln shall be tested one-time only for SO₂ emissions to establish the overall removal efficiency of the lime kiln and its associated scrubber system. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate fee pursuant to FAC Rule 17-4, of which \$1000.00 (more than 100 TPY potential pollutant emissions) has already been received.

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

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

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

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

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 16-141798
Expiration Date: September 24, 1989
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: Nos. 1 and 2 Batch Digester
Systems

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

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

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

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

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

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

2. The maximum production rate of the Nos. 1 and 2 batch digester systems shall not exceed 1987 TPD ADP (tons per day of air dried pulp and based on a nominal utilization rate of 580,000 lbs/hr wood chips (dry) and 898,000 lbs/hr of black/white liquor). For PSD purposes, the maximum production rate will be 1987 TPD ADP. *to submit their #*

*4-14-88
son*

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

3. The Nos. 1 and 2 batch digester systems are subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.b.^a, which is ~~5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted~~ in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5. 4-14-88
BA
by combust.

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

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

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

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

8. Compliance tests using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and ~~40 CFR 60, Appendix A~~, shall be conducted if the permittee does not incinerate the TRS gases from the batch digester systems in the No. 2 or 3 Lime Kiln. 4-14-88
BA

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

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

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

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

4-14-88
TR
15. The Nos. 2 and 3 Lime Kilns' construction/operating permit(s) shall have a Specific Condition that the lime kilns are the ~~pollution~~ control devices for the batch digester systems.
TR S

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

PERMITTEE:
Seminole Kraft Corp.

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

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 16-141799
Expiration Date: September 24, 1989
County: Duval
Latitude/Longitude: 30° 25' 15"N
81° 36' 00"W
Project: No. 1 Multiple Effect
Evaporator System

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

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

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

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

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

1. The No. 1 MEE system may operate continuously, i.e., 8760 hours/year.
2. The maximum total process input rate to the No. 1 MEE system shall not exceed 330,000 lbs/hr of black liquor (15% solids).

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PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

3. The MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 2 or 3 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 20 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average, in accordance with FAC Rule 17-2.600(4)(c)5. 4-14-88
RBR
deletion

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

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

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

7. In the event that a compliance test has to be performed on the MEE system for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 and ~~40 CFR 60, Appendix A~~, shall be used. 4-14-88
deletion
RBR

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

4-14-88
BESD

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

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

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

4-14-88
BESD

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

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

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

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

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

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

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

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

1. The No. 2 MEE system may operate continuously, i.e., 8760 hours/year.
2. The maximum total process input rate to the No. 2 MEE system shall not exceed 450,000 lbs/hr of black liquor (15% solids).

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

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

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

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

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

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

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

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

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

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

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

Attachments to be Incorporated:

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

1. The No. 3 MEE system may operate continuously, i.e., 8760 hours/year.
2. The maximum total process input rate to the No. 3 MEE system shall not exceed 450,000 lbs/hr of black liquor (15% solids).

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

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

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

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

PERMITTEE:
Seminole Kraft Corp.

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

SPECIFIC CONDITIONS:

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

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

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

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

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

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary