

Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

Permittee:

Union Camp Corporation
P.O. Box 37617
Jacksonville, FL 32236

I.D. Number:

31-16-0071-03, 14

Permit/Certification Number:

A016-197534

Date of Issue:

08-23-91

Expiration Date:

July 31, 1996

County:

Duval

Latitude/Longitude:

30:21:00/81:45:00

UTM: Zone 17

E-427.650 N-3357.350

Project:

Boilers Nos. 2 & 3

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

For the operation of Steam Generating Boiler Nos. 2 & 3 with a maximum heat input of 77.5×10^6 BTU's per hour each. The boilers are fired by natural gas, turpentine, turpentine derivatives, No. 6 fuel oil, and crude isobutanol.

Emission source(s) shall be as follows:

<u>Point</u>	<u>Source</u>
03	Boiler No. 2
14	Boiler No. 3

Located at 2051 North Lane Avenue, Jacksonville, FL 32205

Supporting documents shall be as follows:

- (1) Permit A016-160990
- (2) Permit A016-118425
- (3) Union Camp Corporation letter dated May 29, 1991

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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 Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific process and operations applied for as 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 403.733(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. neither 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 is not 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 this permit.
4. This permit conveys not 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore not 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.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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, and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonable 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 provide the Department with the following information:
 - a. A description of an cause of non-compliance; and
 - b. The period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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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 reports, 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Section 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida rules of Civil Procedure and appropriate evidentiary rules.
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 Rules 17-4.120 and 17-20.300, FAC, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit, or a copy thereof, shall be kept at the work site of the permitted activity.
13. This permit constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plan required under Department rules. During enforcement actions, the retention period for all records will be automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold 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), required by this permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained 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 measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - 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.

Best Available Copy

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SPECIFIC CONDITIONS:

1. Permittee shall notify the Air Resources Division (ARD) fifteen (15) days prior to source testing in accordance with Rule 17-2.700(2)(a)5., Florida Administrative Code (FAC), and Rule 2.501, Jacksonville Environmental Protection Board (JEPB).
2. Copies of the test report(s) shall be submitted to ARD within forty-five (45) days of completion of testing in accordance with Rule 17-2.700(7)(b), FAC, and rule 2.501, JEPB.
3. Testing of emissions shall be accomplished at a minimum of 90% of the permitted capacity. If testing is performed at a rate less than 90% of the permitted capacity, operation shall be limited to a maximum of 110% of the tested capacity until such time as an acceptable test is performed at a minimum of 90% of the permitted capacity. When operation is restricted to a lower capacity because of testing at such a level, ARD, upon advanced notification, will allow operation at higher capacities if such operation is for demonstrating compliance at a higher capacity.
4. Any revision(s) to a permit (and application) shall be submitted to an approved by ARD prior to implementing.
5. Control equipment shall be provided with a method of access that is safe and readily accessible.
6. Stack sampling facilities shall be required and shall comply with the requirements of Rule 17-2.700(4), FAC, and Rule 2.501, JEPB.
7. Permittee shall submit an annual operation report to ARD for this (these) source (sources) on the form(s) supplied for each calendar year on or before March 1 in accordance with Rule 17-4.140, FAC.
8. The following pollutant(s) shall be tested at intervals indicated from the date of January 1, 1990:

<u>Pt. No.</u>	<u>Pollutant</u>	<u>Interval</u>	<u>*Test Method</u>
03, 14	Visible Emission (VE)	12 months	EPA Reference Method (RM) 9
	Volatile Organic Compounds (VOC)	24 months	EPA RM 25A
	Total Reduced Sulfur (TRS)	12 months	EPA RM 16

*As described in 40 CFR 60, Appendix A (July 1, 1989)

$$\frac{149}{6} = \frac{10^3 \times 10^3}{29.26} (10^3)$$

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

<u>Pt. No.</u>	<u>Pollutant</u>	<u>¹FAC</u>	<u>²JEPB</u>
03, 14	VE	17-2.600(6)(a)	2.202
	VOC	17-2.620(1)(a)	2.205(b)(1)
	Objectionable Odors OO	17-2.620(2)	2.205(a)
	TRS	—	<u>5.201</u>

$$PPMV = \left(\frac{149}{m^3} \right) \left(\frac{0.02447}{M.W} \right)$$

$$\frac{149}{m^3} (6.2 \times 10^{-11}) = \# / cuft$$

silhr
0.14 #/hr

$$1,307 \frac{m^3}{m^3}$$

$$\left(\frac{8 \#}{ft^3} \right) \left(25,000 \frac{ft^3}{min} \right) (60) =$$

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10. The maximum allowable emissions shall be as follows:

<u>Pt. No.</u>	<u>Pollutant</u>	<u>Other</u>	<u>Opacity</u>
03, 14	VE		20% continuous, 40% for two (2) minutes per hour
	VOC	96% removal	
	OO	none allowed	
	TRS	1.0 ppm (v/v) <i>5/14</i>	

11. Operation of Boiler No. 2 shall be limited to 8760 hours per year.
12. Operation of Boiler No. 3 shall be limited to 8616 hours per year while burning No. 6 fuel oil and 8760 hours per year while burning alternate fuels.
13. The heat input shall be limited to a maximum of 73,808,640 BTUs per hour while burning No. 6 fuel oil.
14. The heat input shall be limited to a maximum of 77,500,000 BTUs per hour while burning alternate fuels.
15. Natural gas, turpentine, turpentine derivatives, and crude isobutanol may be substituted for No. 6 fuel oil as alternate fuels.
16. The use of turpentine or turpentine derivatives as boiler fuel shall not cause or contribute to objectionable odors. Crude sulfate turpentine shall not be used as a boiler fuel.
17. Turpentine and/or turpentine derivatives shall not be used as boiler fuel until the boilers are at a minimum operating temperature of 1200° F.
18. This permit shall supersede permit no. A016-160990.
19. Maximum sulfur content of the No. 6 fuel oil shall be 0.7%.
20. Maximum sulfur content of the turpentine and turpentine derivatives shall be 0.2%.
21. Maximum quantity of turpentine and turpentine derivatives that can be used as boiler fuels at this facility is 5.5×10^6 gallons per year.
22. Fuel oil analysis for percent sulfur for each fuel shall be required upon request.
23. VOC testing shall be in accordance with EPA Reference Method 25 A. Inlet and outlet pollutant mass and concentrations shall be measured simultaneously and percent reduction across the primary control device calculated. The primary control device shall have a minimum of 96% VOC removal efficiency.

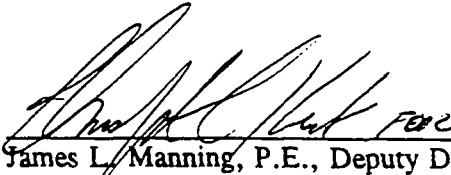
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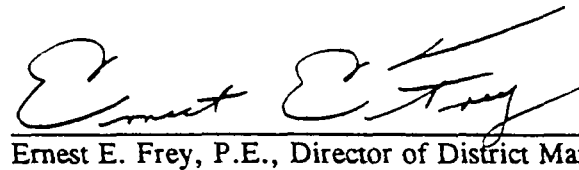
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24. Pursuant to JEPB Rule 5.203 the following items shall be monitored and recorded for boilers:
- a. carbon monoxide (continuous), when used for compliance determination.
 - b. daily boiler log, including but not limited to, unit shutdowns, and bypass events.
25. The Nos. 2 and 3 boilers shall comply with all provisions of JEPB Rule 5 - Control of TRS and VOC Emissions from Crufe Sulfate Turpentine Processing Facilities.
26. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit in accordance with Rule 17-4.090, FAC. Failure to submit a renewal application sixty (60) days prior to the expiration date shall result in the assessment of a penalty in accordance with Section 360.701(a)10., Ordinance Code, City of Jacksonville.

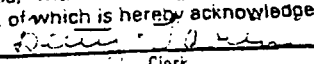
City of Jacksonville
Department of Health, Welfare, and
Bio-Environmental Services


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

State of Florida
Department of Environmental Regulation


Ernest E. Frey, P.E., Director of District Management

¹Florida Administrative Code
²Jacksonville Environmental Protection Board

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to S120.52 Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged. 8/23/91

Clerk Date