

Check Sheet

Company Name: Stone Container Corporation
Permit Number: AE VE - Std Wet Plume Sources
PSD Number: _____
Permit Engineer: _____

Application:

- | | |
|--|--------------------------|
| <input type="checkbox"/> Initial Application | Cross References: |
| <input type="checkbox"/> Incompleteness Letters | <input type="checkbox"/> |
| <input type="checkbox"/> Responses | <input type="checkbox"/> |
| <input type="checkbox"/> Waiver of Department Action | <input type="checkbox"/> |
| <input type="checkbox"/> Department Response | |
| <input type="checkbox"/> Other | |

Intent:

- ☐ Intent to Issue
- ☐ Notice of Intent to Issue
- ☐ Technical Evaluation
- ☒ BACT or LAER Determination
- ☐ Unsigned Permit
- Correspondence with:
 - ☐ EPA
 - ☐ Park Services
 - ☐ Other
- ☐ Proof of Publication
 - ☐ Petitions - (Related to extensions, hearings, etc.)
 - ☐ Waiver of Department Action
 - ☐ Other

Final

Determination:

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

Post Permit Correspondence:

- ☐ Extensions/Amendments/Modifications
- ☐ Other

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

L.D. Riley, Jr.
Stone Container Corp.
PO Box 2560
Panama City, FL
32402

4a. Article Number

P 710 058 500

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

7/10/92

5. Signature (Addressee)

Ray Rensenba

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, October 1990

☆ U.S. GPO: 1990-273-881

DOMESTIC RETURN RECEIPT

P 710 058 500



Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	<i>L.D. Riley</i>
Street & No.	<i>Stone Container</i>
P.O., State & ZIP Code	<i>Panama City FL</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	<i>7-8-92</i>

PS Form 3800, June 1990



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 30, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. L. D. Riley, Jr.
Environmental Superintendent
Stone Container Corporation
Post Office Box 2560
Panama City, Florida 32402

Dear Mr. Riley:

Re: Amendment: Visible Emission Standards Associated with
Particulate Emitting Sources Equipped With Wet
Scrubbers and Exhibiting Wet Plumes Located at
Paper and Pulp Mills

The Department has reviewed letters and supplementary information (attached) submitted by representatives for the paper and pulp industry, which requested interim relief from visible emission standards on particulate emitting sources equipped with wet control systems and exhibiting wet plumes. As a precedent, this request was found to be acceptable in the STIPULATION FOR DISMISSAL OF HEARING (OGC File No. 85-0242) dated August 28, 1985 (attached), between St. Joe Paper Company (now St. Joe Forest Products Company) and the State of Florida Department of Environmental Regulation. Based on the information submitted and the stipulation, the following specific condition shall be incorporated into the air permits of the affected sources:

- o If the Department or its agent observes visible emissions, pursuant to Florida Administrative Code (F.A.C.) Rule 17-2.700(1)(d)1.b. (iii), in excess of 20% [or the applicable limit] opacity, it shall be considered good reason to believe that the applicable mass emission standard is in danger of being violated. Upon such a finding, the permittee shall be required to run a special mass emissions test in accordance with F.A.C. Rule 17-2.700(2)(b); and, such test shall be conducted within 14 days after the Department has notified the permittee, in writing, of the applicability of this permit condition.

Mr. L. D. Riley, Jr.

Page 2

Affected source(s) and associated air permit(s):

o Lime Kiln	o AO 03-174793
o Lime Slaker	o AO 03-169291
o No. 1 Smelt Dissolving Tank	o AO 03-141022
o No. 2 Smelt Dissolving Tank	o AO 03-156517
o No. 2 Bark Boiler	o AO 03-169287
o No. 4 Bark Boiler	o AO 03-169285

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. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the amendment applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. 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, F.S.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit Amendment File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

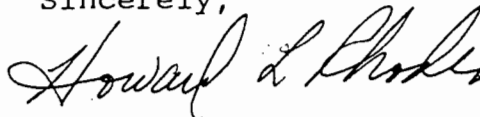
Mr. L. D. Riley, Jr.

Page 3

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 position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This letter amendment must be attached to the affected source's air permit, as referenced above, and shall become a part of the permit.

Sincerely,



Howard L. Rhodes, P.E.
Interim Director
Division of Air Resources
Management

CHF/BM/rbm

Attachments

cc: E. Middleswart, NWD
P. Comer, Esq., DER
G. Smallridge, Esq., DER
T. Cole, Esq., OHF&C
J. Millican, OHF&C

Final Determination

The Department has evaluated information from the Florida Pulp and Paper Association (FPPA) regarding the issue of visible emissions associated with particulate emitting sources equipped with wet control systems and subsequent saturated stack exhaust plumes. Also considered was the DOAH ruling (OGC File No. 85-0242; 8/28/85) that granted relief to a facility of affected sources (St. Joe Paper Company). A proposal of language was distributed to the Department's Northeast and Northwest Districts, the Duval County Air Quality Division (DCAQD), and the FPPA. Comments were received on the proposal and will be addressed in the following:

- A. Northeast District-Andy Kutyna (phone)
Northwest District-Ed Middleswart (phone)

Comment: Since a stack testing team has to be brought in from out-of-town, maybe a time frame of 30-days should be considered for imposing a stack test instead of the 14-days proposed.

Response: Since the industry has sought this time-frame from the original petition (OGC File No. 85-0242) to this recent proposal, the time-frame does not seem to be a logistical problem. Therefore, based on the DOAH ruling, referenced above, and the industry's current proposal, the time-frame to conduct a mass emissions test on a suspect source after written notification from the Department is received will remain 14 days.

- B. DCAQD-Ron Roberson (4/10/92 letter: the comments will not be repeated , but the response will be numbered to correspond with the comment)

1. If the Department has the suspicion of any source's emission limiting standard being violated, of which a visible emission (VE) reading is just one of many indicators, then activities such as a stack test can be initiated for verification of compliance.

2. If a facility's owner/operator allows a source to continue to operate in violation of its permitted conditions, then the Department can initiate action to revoke or rescind the affected source's permit.

3. Until such time that the Department can establish its own stack testing team, then the Department will have to rely on acceptable means to establish and verify compliance. The result of the DOAH ruling was that 14 days was adequate to conduct a mass emissions test after written notification was received and the Department does not feel any differently. Even if the facility performed maintenance and repairs on the affected source prior to conducting a special compliance test, this is no

different than any source subject to an annual compliance test. Also, the affected source's log book can be checked for maintenance and repair work that has been performed. If maintenance and repair work was needed on a source, then the proposed action will force the needed work to be done and the special compliance test will provide the Department with the reasonable assurance that the affected source is within its permitted limits and standards.

C. FPPA-John Millican (Executive Director; 5/4/92 letter)

Comment: The request was to delete the "Note" associated with the proposed Specific Condition, since the only affected source had its control system changed such that its exhaust no longer had moisture interference.

Response: The request is acceptable.

D. Attachments are as follows:

1. STIPULATION FOR DISMISSAL OF HEARING, OGC File No. 85-0242, dated August 28, 1985.
2. PETITION FOR RULEMAKING, from Mr. Terry Cole and dated October 31, 1985.
3. Executive Summary of Petition to Initiate Rulemaking from Mr. Alfred B. Devereaux, Jr. and dated February 5, 1986.
4. Mr. Terry Cole's letter dated April 2, 1991.
5. Mr. John Millican's letter with attachment dated June 25, 1991.
6. Mr. C. H. Fancy's letter dated July 17, 1991.
7. Mr. John Millican's letter with attachment dated August 21, 1991.
8. Mr. John Millican's letter with attachment dated January 10, 1992.
9. Interoffice Memorandum with attachments dated January 30, 1992.
10. Mr. Ronald L. Roberson's letter dated April 10, 1992 (FAX).
11. Mr. John Millican's letter with attachment dated May 4, 1992.

It is recommended that the proposed letter amendment be issued as drafted, with the above referenced changes and attachments incorporated.



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Howard Rhodes
FROM: Clair Fancy *CHF*
DATE: June 29, 1992
SUBJ: Amendment to Operation Permits for Sources with Wet Control Devices and Subsequent Wet Plumes at Paper and Pulp Mills

Attached for your approval and signature are letter amendments allowing the use of the visible emissions as an indicator of potential mass emissions violations with a subsequent mass emissions test requirement for verification.

The Bureau recommends approval of the amendments.

CHF/BM/rbm

Attachments

ATTACHMENT 1

RT EIVED AUG 3 0 1985
RECEIVED AUG 3 0 1985

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

ST. JOE PAPER COMPANY,)

Petitioner,)

vs.)

OGC FILE NO. 85-0242

STATE OF FLORIDA DEPARTMENT)
OF ENVIRONMENTAL REGULATION,)

Respondent.)

STIPULATION FOR DISMISSAL OF HEARING

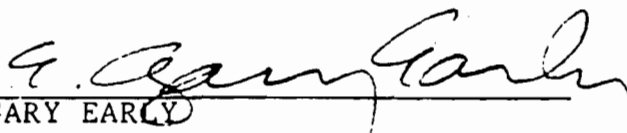
Petitioner, ST. JOE PAPER COMPANY, and Respondent, FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION, enter into this Stipulation for the settlement of the above-entitled case, based upon the following agreement of the parties:

1. The Department of Environmental Regulation will agree to remove from the proposed permit the condition which requires periodic opacity testing by St. Joe Paper Company.
2. The Department will instead insert language as part of the conditions of the permit that the opacity standard in the air rules is applicable to the lime kilns, and that St. Joe Paper Company may be required to test should the Department have reasonable grounds to believe that a violation of the opacity limit is occurring. St. Joe Paper Company on its part agrees to accept those conditions so long as the referenced rule is in effect.
3. St. Joe Paper Company will agree to submit a petition for rulemaking and suggested language for the rule change which it proposes, and the Department agrees to in good faith consider such a rule, although no commitments are made as to whether the rule will or will not be changed until such investigation is completed. St. Joe Paper Company on its part agrees to cooperate in the rulemaking effort, and furnish such information as it can regarding the proposed rule.

IN CONSIDERATION OF THE ABOVE AGREEMENTS, the Parties request that the Hearing Officer enter a Recommended Order incorporating this Stipulation, and cancel the hearing currently scheduled for September 19, 1985.

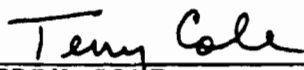
FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION
2600 Blair Stone Road
Tallahassee, Florida 32301

OERTEL & HOFFMAN, P.A.
2700 Blair Stone Road
Suite C
Tallahassee, Florida 32301


GARY EARLY

Attorney for Respondent

Date: 08/28/85

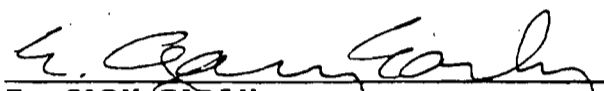

TERRY COLE

Attorney for Petitioner

Date: Aug. 23, 1985

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one true copy of the foregoing STIPULATION FOR DISMISSAL OF HEARING has been furnished by U.S. Mail to Robert T. Benton II, Hearing Officer, Division of Administrative Hearings, The Oakland Building, 2009 Apalachee Parkway, Tallahassee, Florida 32301, and a copy of the same by U.S. Mail to Terry Cole, Esquire, Oertel & Hoffman, P.A., 2700 Blair Stone Road, Suite C, Tallahassee, Florida 32301, this 29 day of August, 1985.


E. GARY EARLY
Assistant General Counsel

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301
Telephone: (904) 488-9730

ATTACHMENT 2

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

IN RE:

Petition for Rulemaking by
ST. JOE PAPER COMPANY and
the FLORIDA PULP AND PAPER
ASSOCIATION

*
*
*
*
*
*

CASE NO.:

PETITION FOR RULEMAKING

Petitioners, ST. JOE PAPER COMPANY and the FLORIDA PULP AND PAPER ASSOCIATION, petition the Florida Department of Environmental Regulation and the Environmental Regulation Commission for the adoption of a new paragraph in Rule 17-2.600(11), Florida Administrative Code, which would read:

(11) Lime Kilns at Pulp and
Paper Mills.

(a) New and Existing Kilns -
as provided in the Process Weight
Table, Section 17-2.610(1).

This Petition is filed pursuant to Section 120.54(5), Florida Statutes. Petitioner, St. Joe Paper Company is regulated by the Department of Environmental Regulation, as evidenced by the many permits which have been issued to Petitioner, and the large number of rules which are applicable to and govern its operations, including the one which is the subject of this Petition for Rulemaking. Petitioner, St. Joe Paper Company, thus has standing under Section 120.54(5), Florida Statutes, to file such a petition.

Petitioner, Florida Pulp and Paper Association, is an association of all the pulp and paper companies in the state. All of the companies are regulated by the Florida Department of Environmental Regulation and are subject to Rule 17-2, Fla. Admin. Code. One of the purposes of the Florida Pulp and Paper Association is the monitoring of environmental rules and providing comment on behalf of the industry in Florida. Thus, Petitioner, Florida Pulp and Paper Association, has standing under Section 120.54(5), Fla. Admin. Code to file this Petition.

Petitioners request that the Petition be granted, and that the Department as part of the rulemaking proceedings initiate a review of the proper limitations for lime kilns at pulp and paper mills, including a review of the EPA New Source Performance Standards for lime kilns at pulp and paper mills. Those standards do not contain any limitation on opacity for new sources.

Petitioner, St. Joe Paper Company, previously filed a Petition for Hearing with the Department which was referred to the Division of Administrative Hearings. However, the Petitioner and the Department were able to amicably resolve the matter by the attached Stipulation. In that Stipulation, the Department agreed to initiate an investigation or review of the rule in question, although as specified in the Stipulation, no commitments have been made regarding any changes to the rule. Therefore, Petitioners respectfully request that their Petition be forwarded to the Environmental Regulation Commission and that their Petition for Rulemaking be granted, and that the Department consider the above proposed amendment as part of its review of the rule in question.

Respectfully submitted,

OERTEL & HOFFMAN, P.A.
2700 Blair Stone Road
Suite C
Tallahassee, Florida 32301
(904) 877-0099

Terry Cole
TERRY COLE

On behalf of ST. JOE PAPER
COMPANY and the FLORIDA PULP
AND PAPER ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of the foregoing PETITION FOR RULEMAKING has been hand-delivered to:

Mary Smallwood, General Counsel
State of Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

and true and correct copy was also hand-delivered to:

E. Gary Early
Assistant General Counsel
State of Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

this 31st day of October, 1985.

OERTEL & HOFFMAN, P.A.
Suite C
2700 Blair Stone Road
Tallahassee, Florida 32301

Terry Cole
TERRY COLE

On behalf of ST. JOE PAPER
COMPANY and the FLORIDA
PULP AND PAPER ASSOCIATION

ATTACHMENT 3

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

TO: Environmental Regulation Commission

FROM: Alfred B. Devereaux, Jr. *Y*

DATE: February 5, 1986

SUBJECT: Executive Summary - Petition to Initiate Rulemaking by
the St. Joe Paper Company and the Florida Pulp and Paper
Association.

Issue:

Whether to accept or deny the subject petition to initiate rulemaking procedures for development of rules for particulate and visible emissions limiting standards specifically for lime kilns at kraft pulp mills.

Background:

The St. Joe Paper Company petitioned for a hearing regarding proposed permit conditions to be held September 19, 1985 on the requirement for periodic visible emission testing by the Company on its lime kilns. The visible emission and particulate emission limiting standards imposed in the permit were those found in Florida Administrative Code Rule 17-2.610. Prior to the hearing, the Company and the DER stipulated to a dismissal of the hearing based on several conditions. One of these conditions included an agreement by DER "to in good faith consider such a rule, although no commitments are made as to whether the rule will or will not be changed until such investigation is completed". The rule to be considered would include an emission limiting standard for visible emissions and particulate emissions from kraft pulp mill lime kilns. The petitioner has proposed draft rule language. The Department intends to consider petitioner's draft rule, but will ultimately attempt to formulate a rule in keeping with the technical capabilities of the industry.

Environmental Regulation Commission
Page Two
February 5, 1986

Alternatives:

The Commission may choose one of the following:

(1) Refuse the petition. This action would deny a logical procedure to attempt to resolve questions regarding the application of the visible emission and particulate emission limiting standards.

(2) Accept the petition. This action would allow the DER to consider the basis for the existing rule, and propose changes through rulemaking procedures when and if necessary.

Recommendation:

The DER recommends that the petition be accepted.

AD:mjw

LAW OFFICES

OERTEL & HOFFMAN

A PROFESSIONAL ASSOCIATION

KENNETH G. OERTEL
KENNETH F. HOFFMAN
SEGUNDO J. FERNANDEZ
TERRY COLE
SYDNEY H. MCKENZIE, III
M. CHRISTOPHER BRYANT
W. DAVID WATKINS
MARTHA J. EDENFIELD

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

November 8, 1985

Mr. E. Gary Early
Assistant General Counsel
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

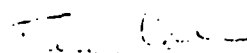
Dear Gary:

As you requested, due to the fact that the Commission will not meet within in the next thirty days, this letter will waive the statutory requirement that such petition for rulemaking be granted or denied within thirty (30) days. This waiver will extend through the next meeting of the Environmental Regulation Commission.

In the meantime, I hope that we can begin working with the Department on this issue, since the Department has already agreed to consider such a rule change. Accordingly, such a waiver of the formal granting of the petition will hopefully not delay the ultimate consideration and action on this petition.

I appreciate the cooperation that both you and Steve Smallwood and his staff have given. Please coordinate with us in terms of any recommendations that the Department makes to the Commission on the Petition, and we will do the same.

Sincerely,


Terry Cole

TC:nbg

cc: Mr. Robert Neadly
Mr. Lewis Taylor
Mr. Steve Smallwood

ATTACHMENT 4

OERTEL, HOFFMAN, FERNANDEZ & COLE, P A.

ATTORNEYS AT LAW

SUZANNE BROWNLESS
M. CHRISTOPHER BRYANT
R. L. CALEEN, JR.
C. ANTHONY CLEVELAND
TERRY COLE
ROBERT C. DOWNIE, II
MARTHA J. EDENFIELD
SEGUNDO J. FERNANDEZ
KENNETH F. HOFFMAN
KENNETH G. OERTEL
HAROLD F. X. PURNELL
PATRICIA A. RENOVITCH
SCOTT SHIRLEY
THOMAS G. TOMASELLO
W. DAVID WATKINS

SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

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

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

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

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

April 2, 1991

RECEIVED
APR 2 1991

Mr. Steve Smallwood
Director
Division of Air Resources Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**Dept. of Environmental Reg.
Office of General Counsel**

Re: Petition for Rulemaking for Visible Emission Limits for
Sources With Wet Scrubbers

Dear Mr. Smallwood:

For several years the Department and the Florida Pulp and Paper Association have dealt with issues involving visible emission limiting standards (opacity) for sources with wet scrubbers. Frequently, these issues have involved scrubbers controlling either lime kilns, recovery boilers, or smelt dissolving tanks. Those issues have continued up through the recent modification of a Jefferson Smurfit lime kiln construction permit. Quite a few sources within the pulp and paper industry have wet scrubbers and thus encounter the difficulty of complying with this imprecise method of measuring particulate matter compliance.

The Environmental Regulation Commission, at the Department's recommendation, granted a Petition for Rulemaking to initiate rulemaking for lime kiln visible emissions. The petition was granted on February 19, 1986. A copy of the Petition and Executive Summary for the ERC and Stipulation is attached. We have had a number of meetings with Department staff over the last several years to discuss this rule and the Department scheduled it for adoption with a corrective amendments package a couple of years ago. However, the corrective amendments to Rule 17-2 dropped behind schedule and with it the opacity limitation review.

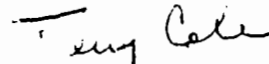
We believe that it is now time to renew efforts at adopting a specific rule on visible emission limits or opacity for sources with wet scrubbers. The rule should encompass both particulate

Mr. Steve Smallwood
April 2, 1991
Page 2

attainment areas and air quality management areas which are currently unclassified. We will be glad to provide assistance and input. Previously, such a joint effort resulted in a rule on recovery boilers, which has worked well. We pledge our efforts at supporting the Department's rulemaking efforts on wet sources.

We would like to meet with you and your staff to discuss the schedule for the rule development effort and information needs regarding this rule. We will contact you shortly to schedule such a meeting.

Sincerely,


Terry Cole

TC:sj

Attachments

xc: Secretary Carol Browner
Gary Smallridge
Vernon Adams
John Millican

ATTACHMENT 5

FLORIDA PULP & PAPER ASSOCIATION
TECHNICAL & ENVIRONMENTAL COMMITTEE

VERNON ADAMS, CHAIRMAN
CLIFFORD HENRY, VICE CHAIRMAN
JOHN MILLICAN, EXECUTIVE DIRECTOR



MAILING ADDRESS:
POST OFFICE BOX 6507
TALLAHASSEE, FL 32314-6507
TELEPHONE (904) 877-0099
TELECOPIER (904) 877-0981

June 25, 1991

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

Re: Visible Emissions

Dear Mr. Fancy:

Attached is a draft letter which, if issued by the Air Bureau, could satisfy the need of each of the Pulp & Paper companies to be covered by the language developed by the Department. Said language was a result of the STIPULATION FOR DISMISSAL OF HEARING contained in OGC File No. 85-024 and included in the petition for rule making which was filed by St. Joe and the Florida Pulp & Paper Association and granted by the ERC on February 19, 1986.

The benefit to the Department is to provide an orderly process for rule making void of any deadline for action. The mutual benefit to the industry and the Department is to provide the permit condition to the industry permits which was agreed to in the stipulation contained in OGC File No. 85-024. This will prevent any unnecessary enforcement situations which might otherwise arise.

Mr. Clair H. Fancy

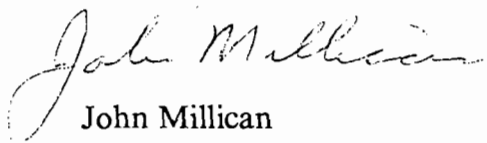
June 25, 1991

Page 2

The draft, as amended to accommodate Department needs, could be addressed to me with circulation to the attached list or a letter could be addressed to each company on the attached list. If you desired, the letter could be addressed to me and I could circulate it to the group.

We believe this is in agreement with our discussion in the meeting on April 9, 1991 and subsequent telephone discussion. Your prompt attention to provide the permit condition previously agreed to is important to the industry and will be appreciated. If you have concerns or questions please call me or Mr. Terry Cole at (904) 877-0099.

Sincerely,

A handwritten signature in cursive script, reading "John Millican".

John Millican
Executive Director
FPPA T&E Committee

JM/Fancy.ltr/sj

xc: FPPA T&E Committee
Mr. Terry Cole

~~June 14, 1987~~

Mr. John Millican
Executive Director
FPPA T&E Committee

DRAFT

RE: Visible Emissions

Dear John:

The purpose of this letter is to provide temporary limits for visible emissions from particulate emission sources in the Pulp & Paper industry which are equipped with Wet scrubbers. The content is based on the STIPULATION FOR DISMISSAL OF HEARING (OGC File No. 85-0242) dated August 28, 1985, between St. Joe Paper Company (now St. Joe Forest Products Company) and the State of Florida Department of Environmental Regulation.

In that stipulation the Department agreed to language requiring St. Joe "...to test should the department have reasonable grounds to believe that a violation of the opacity limit is occurring." The language which the department developed and subsequently included in St. Joe permits reads as follows:

"if the department observes visible emissions in excess of 20% [or applicable limit] opacity it shall be considered good reason to believe that the applicable mass emission standard is in danger of being violated. The permittee shall be required to run a special compliance test in accordance with F.A.C. Rule 17-2.700 (2)(b). Such test shall be conducted within 14 days after the department has notified the permittee of the applicability of this permit condition.

St. Joe agreed "...to accept the conditions so long as the referenced rule is in effect." Also, St. Joe agreed to submit a petition for rule making. St. Joe and the Florida Pulp and Paper Association filed the aforementioned petition on October 31, 1985 and the Environmental Regulation Commission granted the petition on February 19, 1986.

The language in the stipulation was intended as an interim measure to be applied industry wide pending rulemaking as provided in the petition granted by the ERC. Subsequently similar language has been incorporated in the permits for some of the companies in the industry.

In order to avoid the necessity of amending all existing permits, this letter will provide a similar opacity limit to all Pulp and Paper industry particulate emission sources which are

equipped with wet scrubbers. A copy should be appended to affected permits.

Sincerely,

Clair Fancy

Mr. Jerry Cox and Gene Tonn
Jefferson Smurfit Corp.
P. O. Box 150
Jacksonville, FL 32201

Mr. Clifford Henry
Procter & Gamble Cellulose Co.
Rt. 3, Box 260
Perry, FL 32347

Mr. David Arceneaux
Champion International Corp.
P. O. Box 87
Pensacola, FL 32533

Mr. Roger Hagan
Container Corporation of America
North 8th Street
Fernandina Beach, FL 32034

Mr. Milt Shirley
ITT Rayonier, Inc.
750 Hammond Road
Atlanta, GA 30328

Mr. Curt Barton
Stone Container Corp.
P. O. Box 2560
Panama City, FL 32402

Mr. Mike Riddle
Seminole Kraft Corp.
P. O. Box 26998
Jacksonville, FL 32218-0998

Mr. David Riley
Stone Container Corporation
P. O. Box 2560
Panama City, FL 32402

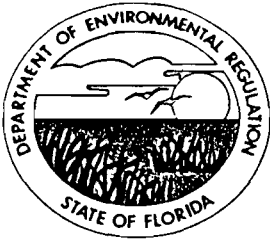
Mr. Lewis Taylor
St. Joe Forest Products Co.
P. O. Box 190
Port St. Joe, FL 32456

Mr. Vernon Adams
Georgia-Pacific Corp.
P. O. Box 919
Palatka, FL 32078

Ms. Virginia Holton
Packaging Corporation of America
P. O. Box 1048
Valdosta, GA 31603

Mr. Bob Fisher
NCASI
P. O. Box 14483
Gainesville, FL 32604

ATTACHMENT 6



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 17, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. John Millican
Executive Director
FPPA T&E Committee
Post Office Box 6507
Tallahassee, Florida 32314-6507


Dear Mr. Millican:

Re: Visible Emissions - Pulp and Paper Industry

The Department is currently evaluating the request that you sent on June 25, 1991, regarding visible emissions standards and sources equipped with wet scrubber control systems at pulp and paper mills. In order for the Department to completely assess the request, please submit to the Department's Bureau of Air Regulation a listing of each facility's affected source(s), its air permit number(s), and a description of the associated wet scrubber control system [i.e., type, model number, volumetric flow rates (acfm & scfm), scrubber medium and pH, etc.].

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

Sincerely,


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

CHF/BM/rbm

cc: A. Kutyna, NE District
E. Middleswart, NW District
R. Roberson, BESD
G. Smallridge, Esq., DER

ATTACHMENT 7

FLORIDA PULP & PAPER ASSOCIATION
TECHNICAL & ENVIRONMENTAL COMMITTEE

VERNON ADAMS, CHAIRMAN
CLIFFORD HENRY, VICE CHAIRMAN
JOHN MILLICAN, EXECUTIVE DIRECTOR



MAILING ADDRESS:
POST OFFICE BOX 6507
TALLAHASSEE, FL 32314-6507
TELEPHONE (904) 877-0099
TELECOPIER (904) 877 0981

HAND-DELIVERY

August 21, 1991

RECEIVED

AUG 21 1991

Bureau of
Air Regulation

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

Re: Visible Emission Standard for Wet Stacks - Pulp and Paper
Industry

Dear Mr. Fancy:

Following receipt of your July 17, letter, I have gathered the additional information regarding wet scrubber control systems from all of the mills except Champion International Corporation, which is attached. As soon as I receive champion's information, I will send it to you.

Thank you for your assistance and cooperation in expediting your review of our June 25 request. We would appreciate your agreement with our request.

Sincerely,

John Millican
John Millican *by JMS*

JM/dg/1197

Attach.



CONTAINER CORPORATION OF AMERICA

AN AFFILIATE OF JEFFERSON SMURFIT CORPORATION

July 30, 1991

John Millican
Executive Director
Florida Pulp & Paper Association
P.O. Box 6507
Tallahassee, Florida 32314-6507

Dear Mr. Millican:

The following is the information that you requested for the DER on visible emissions from wet stacks:

#4 Smelt Dissolving Tank

Permit# A045-107514
Scrubber Type: Venturi
Model# Airpol 50,000
Scrubber Medium: Mud Wash Water
Scrubber pH: 12.0 - 12.5
Volumetric Flow: 50,000 acfm

#5 Smelt Dissolving Tank

Permit # A045-167572
Scrubber Type: Venturi
Model# Airpol 50,000
Scrubber Medium: Mud Wash Water
Scrubber pH: 12.0 - 12.5
Volumetric Flow: 50,000 acfm

If you have any questions, please call me at (904) 277-5811.

Sincerely,

R. Scott Shively
Process Engineer
Technical Department

RSS/sl

Mill Division
NORTH 8TH STREET
P.O. BOX 2000
FERNANDINA BEACH, FL 32034
TELEPHONE: 904/261-5551

RECEIVED

AUG 2 1991

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

ITT RAYONIER

WET SCRUBBERS

Source Permit No.	Scrubber Description	Scrubbing Medium	pH	Volumetric Flow Rate ACFM/SDCFM	Remarks
No. 1 Power Boiler AO45-183504	Air Pol - wet Venturi-type "A" scrubber	Waste caustic (1F washer effluent)	5.8 - 6.2	<u>145,000</u> 105,000	Power boilers 1 & 2 normally discharge to "A" scrubber and boiler No. 3 to "B" scrubber. The mill has the capability however to utilize "B" scrubber for boilers 2 & 3.
No. 2 Power Boiler AO45-183506	Air Pol - wet Venturi-type "A" scrubber	Waste caustic (1F washer effluent)	5.8 - 6.2	<u>145,000</u> 105,000	Power boilers 1 & 2 normally discharge to "A" scrubber and boiler No. 3 to "B" scrubber. The mill has the capability however to utilize "B" scrubber for boilers 2 & 3.
No. 3 Power Boiler AO45-183507	Air Pol - wet Venturi-type "B" scrubber	Waste caustic (1F washer effluent)	5.8 - 6.2	<u>155,000</u> 106,000	During stack testing, 1 & 2 boilers discharge through "A" scrubber and 2 & 3 discharge through "B" scrubber.
Acid Plant Stack AO45-107909	Converted lime rock tower (tray tower)	Caustic soda or soda ash	6.2	<u>26,000</u> 19,000	
Sulfite Recovery Blr. AO45-171127	Katzen Associates Design - 3 stage wet scrubber	Ammonium hydroxide	6.0	<u>149,000</u> 120,000	

JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL

No. 10 Coal/Bark Boiler

Permit No. AO16-185036

Variable throat venturi scrubber followed by a Caustic SO₂ absorber section and Chevron type mist eliminator.

Scrubber Medium: Mill process water/evaporator process
condensate, pH 6.4

Stack Volumetric Flow: 180,000 acfm
130,000 scfm

No. 3 Lime Kiln

Permit No. AC16-142989

Air Pol Venturi Scrubber

Scrubber Medium: Fresh water, pH 7.5

Stack Volumetric Flow: 24,600 acfm
16,400 scfm

Now shut down, replaced by an electrostatic precipitator.

Smelt Dissolving Tank Vent

Permit No. AO16-170502

Ducon UW-4 Entrainment Scrubber

Scrubber Medium: Weak wash, pH 12.7

Stack Volumetric Flow: 36,000 acfm
24,200 scfm

PROCTER & GAMBLE CELLULOSE COMPANY
PERRY, FLORIDA

WET PLUME SOURCES

Name; Permit/ID#; flow characteristics; type; medium.

#2 Smelt Dissolving Tank; AO62-191214/31JAX62000121;
17,000 acfm & 8,000 dscfm; Ducon #22-4-0298 wet scrubber;
weak liquor @ pH >7 for PM and TRS control.

#3 Smelt Dissolving Tank; AO62-187788/31JAX62000122;
20,000 acfm & 12,000 dscfm; Ducon #22-4-0400 wet scrubber;
weak liquor @ pH >7 for PM and TRS control.

#4 Smelt Dissolving Tank; AO62-130573/31JAX62000123;
27,000 acfm & 15,000 dscfm; Ducon #20-4-0340 wet scrubber;
weak liquor @ pH >7 for PM and TRS control.

#1 Bark Boiler; AO62-126937/31JAX62000104;
100,000 acfm & 67,000 dscfm; Ducon 92R/180 wet venturi
scrubber; water @ pH 7 for PM control.

#2 Bark Boiler; AO62-126398/31JAX62000119;
250,000 acfm & 171,000 dscfm; wet venturi scrubber;
water @ pH 7 for PM control.

Note: SDT's have language in current permit around moisture
interference and VE's.

GEORGIA-PACIFIC

No. 4 Lime Kiln:

AC54-192551
(PSD-FL-171)

Venturi Scrubber
Weak Wash
1,540,000 dscf/hr.

No. 4 Smell Dissolving Tanks: AC54-193841
(PSD54-171)

Venturi Scrubber
Weak Wash
1,430,000 dscf/hr.

Note: Both Lime Kiln and SDTs have permit language on moisture interference and VE

jps-gp.scr

ST. JOE FOREST PRODUCTS CO.
WET SCRUBBERS

<u>Source</u>	<u>Permit #</u>	<u>Scrubber</u>	<u>Stack Flow</u>	
			<u>ACFM</u>	<u>SCFM</u>
#1 Lime Kiln	A023-175311	Ducon Venturi	23,000	14,000
#2 Lime Kiln	A023-175315	" "	"	"
#3 Lime Kiln	A023-175314	" "	"	"
#5 & 6 Smelt Tank Scrubber	A023-164869	Ducon	23,000	18,000
#7 Smelt Tank Scrubber	A023-164848	"	43,000	26,000

Lime Kiln Scrubbers use H₂O as scrubber medium at a pH \geq 12.5.

Lime kiln type & model:

Ducon Oriclone High Δ P Venturi Scrubber size 48/96 Type VV0,
Flooded elbow, cyclonic separation.

Smelt Tank Scrubbers Type & Model:

5 & 6 Ducon Dynamic Gas Scrubber type UW-4 Model III.

E7 - Ducon Dynamic Gas Scrubber Type VW-4 Model IV Size 126

jps-sjfp.scr

SEMINOLE

No. 1 Bark Boiler

AO16-749235

Scrubber medium - water (once through hot water from pulpmill)

pH 8-9

No. 2 Bark Boiler

AO16-149236

Medium - water (once through hot water from pulp mill)

pH 8.9

No. 1 Lime Kilns

AO16-174975

No. 2 Lime Kilns

AO16-174976

No. 3 Lime Kilns

AO16-174977

Medium - water recirculating with hot water makeup

pH 8.5 - 9.5

No. 1 Recovery Boiler

AO16-159612

No. 2 Recovery Boiler

AO16-159615

No. 3 Recovery Boiler

AO16-159616

Medium - water recirculating with fresh water makeup

pH 7.0 - 8.0

No. 1 Smelt Tank Vents

AO16-155786

No. 2 Smelt Tank Vents

AO16-155787

No. 3 Smelt Tank Vents

AO16-155788

Medium - Weak wash once through; no discharge to sewer; stays in process

pH 11.0 - 12.0

No. 3 Slaker

AO16-155275

Medium - hot water once through

pH 8.0 - 9.0

STONE CONTAINER CORPORATION
WET SCRUBBERS

<u>Source</u>	<u>Permit No.</u>	<u>Scrubber</u>	<u>Medium</u>	<u>pH</u>	<u>Temp</u>	<u>Stack Flow (acfm)</u>
Lime Kiln	A003-174793	Venturi	Water	-	630° R	71,751
Slaker	A003-169291	Showers	Hot Water	7	655° R	5,336
SDT 1	A003-141022	Demister	Water	7	625° R	31,100
SDT 2	A003-156517	Demister	Water	7	613° R	35,052
Bark Boiler #2	A003-169287	Venturi	Water	5.5-9.0	599° R	215,138
Bark Boiler #4	A003-169285	Venturi	Water	5.5-9.0	602° R	217,602

ATTACHMENT 8

FLORIDA PULP & PAPER ASSOCIATION
TECHNICAL & ENVIRONMENTAL COMMITTEE

VERNON ADAMS, CHAIRMAN
CLIFFORD HENRY, VICE CHAIRMAN
JOHN MILLICAN, EXECUTIVE DIRECTOR



MAILING ADDRESS:
POST OFFICE BOX 6507
TALLAHASSEE, FL 32314-6507
TELEPHONE (904) 877-0099
TELECOPIER (904) 877-0981

RECEIVED

JAN 10 1992

Division of Air
Resources Management

HAND-DELIVERY

January 10, 1992

Mr. Bruce Mitchell
Bureau of Air Regulation
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, FL 32399

Re: Visible Emission from Wet Stacks

Dear Bruce:

I am sorry for the delay in completing the information you had requested for the wet stacks in the pulp and paper mills in Florida. The attached information from Champion's mill in Cantonment, Florida completes the information package.

We would appreciate your expedited review and making the permit amendments. Please call me if I may be of further assistance.

Thank you.

Sincerely,

John Millican
John Millican *by JPM*

JM/dg/1197

xc: David Arceneaux

VISIBLE EMISSIONS FROM WET STACKS - LISTING OF CHAMPION'S AFFECTED SOURCES

SOURCE	AIR PERMIT #	SOURCE I.D. #	SCRUBBER TYPE	MODEL	FLOW acfm	FLOW scfm	SCRUBBER MEDIUM	MEDIUM pH	OPACITY REQUIREMENTS
No. 3 Power Boiler	A017-146028	10PEN17004233	Venturi	Neptune Air Pol	92600	65000	Fresh water **	>5.5	Scrubber pressure drop: 3-hour average => 9.1" of water
No. 4 Power Boiler	A017-145038	10PEN17004237	Venturi	EMC Type TI model 280X	221000	147000	Fresh water **	>5.5	Scrubber pressure drop: 3-hour average => 10.0" of water
No. 1 smelt diss. tank	A017-181734	10PEN17004232	Venturi	Air Pol	23400	12100	Weak Wash	*	None
No. 2 smelt diss. tank	A017-181735	10PEN17004238	Venturi	Air Pol	19300	7300	Weak Wash	*	None
Line Kilo	A017-181738	10PEN17004228	Venturi	Air Pol, model LX12D	62500	32000	Fresh water	*	Scrubber pressure drop: 12-hour average => 26" of water
Line Calciner	A017-151541	10PEN17004236	Venturi	Dorr Oliver	20800	13000	Fresh water	*	Scrubber pressure drop: 12-hour average => 24" of water
Line Slaker	A017-137615	10PEN17004246	Impingement	Ducon, model 44	5330	1450	Green liquor	>11	None

* pH is not measured, but would normally be >8.

** Caustic is added to maintain set-point pH.

ATTACHMENT 9



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Ed Middleswart, NWD
Andy Kutyna, NED
Ron Roberson, DCAQD

FROM: Bruce Mitchell *RBm*

DATE: January 30, 1992

SUBJ: Review and Edit of the Proposed and Attached Letter on Sources with Wet Control Devices and Subsequent Wet Plumes at Paper and Pulp Mills

Please review and edit the proposed attached letter, which has already been reviewed and edited by Clair Fancy.

Points of clarification:

1. The letter will be addressed to each mill's representative;
2. Each mill's affected source will be identified along with the affected permit (page two: "o" "o"; affected listings are attached also-please review and note any concerns); and,
3. The "cc" listing will only identify the above referenced contact and the affected District office (i.e., NED or NWD) and Local Program office (DCAQD).

It would be appreciated if you would respond about your concerns, if any, as soon as possible. If there are any questions, please give me a call at SC/278-1344. Thanks!

BM/rbm

Attachments



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

February xx, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Plant Manager
Mill Name
Address
City, Florida Zip

Dear Mr. _____:

Re: Amendment: Visible Emission Standards Associated with
Particulate Emitting Sources Equipped With Wet
Scrubbers and Exhibiting Wet Plumes Located at
Paper and Pulp Mills

The Department has reviewed letters and supplementary information (attached) submitted by representatives for the paper and pulp industry, which requested interim relief from visible emission standards on particulate emitting sources equipped with wet control systems and exhibiting wet plumes. As a precedent, this request was found to be acceptable in the STIPULATION FOR DISMISSAL OF HEARING (OGC File No. 85-0242) dated August 28, 1985 (attached), between St. Joe Paper Company (now St. Joe Forest Products Company) and the State of Florida Department of Environmental Regulation. Based on the information submitted and the stipulation, the following specific condition shall be incorporated into the air permits of the affected sources:

- o If the Department or its agent observes visible emissions, pursuant to Florida Administrative Code (F.A.C.) Rule 17-2.700(1)(d)1.b. (iii), in excess of 20% [or the applicable limit] opacity, it shall be considered good reason to believe that the applicable mass emission standard is in danger of being violated. Upon such a finding, the permittee shall be required to run a special mass emissions test in accordance with F.A.C. Rule 17-2.700(2)(b); and, such test shall be conducted within 14 days after the Department has notified the permittee, in writing, of the applicability of this permit condition.

Note: This condition shall not be applicable to sources located in nonattainment areas nor sources subject to visible emission standards imposed by the New Source Performance Standards, 40 CFR 60.

Letter
Page Two

Affected source(s) and associated air permit(s):

o	o
o	o
o	o

This letter amendment must be attached to the affected source's air permit, as referenced above, and shall become a part of the permit.

Sincerely,

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

CHF/BM/rbm

Attachments

cc: District (E. Middleswart, NWD)
(A. Kutyna, NED)
(R. Roberson, DCAQD)
G. Smallridge, Esq., DER
T. Cole, Esq., OHF&C
J. Millican, OHF&C

ATTACHMENT 10

DEPARTMENT OF REGULATORY &
ENVIRONMENTAL SERVICES
Air Quality Division



April 10, 1992

Mr. Bruce Mitchell
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Visible Emissions of Pulp and Paper Mill Wet Plume Specific
Condition

Dear Mr. Mitchell:

The Air Quality Division (AQD) has reviewed the proposed Specific
Condition and find it unacceptable. AQD objections are as follows:

1. The condition as it currently reads suggests that the only reason for suspecting that the applicable mass emission standard is in danger of being violated is by visible emission observations. If the control device is not operating within the manufacturer's specifications, a visible emissions test and violation would be required before a mass emission test could be requested.
2. The proposed condition does not take into account the possibility of repeat offenses or chronic offenders. The condition actually restricts effective enforcement of permit violations.
3. The condition requires that a mass emission test be performed within fourteen (14) days of written notification. If the source is suspected of a potential violation, corrective measures may be enacted within the allowed time period and the test becomes a worthless exercise. The fixed time period in effect makes the mass emission test unacceptable.

Please contact me if there are any questions at (904) 630-3666 or
Sun Com 986-3666.

Very truly yours,

Ronald L. Roberson
Associate Engineer

RLR/ema

cc: AQD File, General Correspondence

disc/#7/RLR/Mitchell



421 West Church Street - Suite 412
Jacksonville, Florida 32202-4111

Area Code 904/630-3666

DEPARTMENT OF REGULATORY &
ENVIRONMENTAL SERVICES
OFFICE OF THE DIRECTOR

(904) 630-3666

FAX No. 630-3638



TELECOPY

DATE: 4-9-92

TO: _____

BRUCE MITCHELL

ORGANIZATION: _____

DER - BAR

TELECOPIER PHONE NUMBER: _____

(904) 922-6979

FROM: _____

RON ROBERSON

NO. OF PAGES TO FOLLOW: _____

1

RECEIVED

APR 13 1992

Division of Air
Resources Management

DEPARTMENT OF REGULATORY &
ENVIRONMENTAL SERVICES
Air Quality Division



April 10, 1992

Mr. Bruce Mitchell
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Visible Emissions of Pulp and Paper Mill Wet Plume Specific Condition

Dear Mr. Mitchell:

The Air Quality Division (AQD) has reviewed the proposed Specific Condition and find it unacceptable. AQD objections are as follows:

1. The condition as it currently reads suggests that the only reason for suspecting that the applicable mass emission standard is in danger of being violated is by visible emission observations. If the control device is not operating within the manufacturer's specifications, a visible emissions test and violation would be required before a mass emission test could be requested.
2. The proposed condition does not take into account the possibility of repeat offenses or chronic offenders. The condition actually restricts effective enforcement of permit violations.
3. The condition requires that a mass emission test be performed within fourteen (14) days of written notification. If the source is suspected of a potential violation, corrective measures may be enacted within the allowed time period and the test becomes a worthless exercise. The fixed time period in effect makes the mass emission test unacceptable.

Please contact me if there are any questions at (904) 630-3666 or Sun Com 986-3666.

Very truly yours,

Ronald L. Roberson
Associate Engineer

RLR/ema

cc: AQD File, General Correspondence

disc/#7/RLR/Mitchell



421 West Church Street - Suite 412
Jacksonville, Florida 32202-4111

Area Code 904/630-3666

ATTACHMENT 11

FLORIDA PULP & PAPER ASSOCIATION
TECHNICAL & ENVIRONMENTAL COMMITTEE

VERNON ADAMS, CHAIRMAN
CLIFFORD HENRY, VICE CHAIRMAN
JOHN MILLICAN, EXECUTIVE DIRECTOR



MAILING ADDRESS:
POST OFFICE BOX 6507
TALLAHASSEE, FL 32314-6507
TELEPHONE (904) 877-0099
TELECOPIER (904) 877-0981

May 4, 1992

Mr. R. Bruce Mitchell
Department of Environmental
Regulation
Room 338
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

MAY 05 1992

Division of Air
Resources Management

RE: Draft Letter on Pulp and Paper
Industry Visible Emission Standards

Dear Mr. Mitchell:

The language in this draft (copy attached) has been changed from the language which previously has been appended to or included in some industry permits. However, it appears that both the intent to apply and application have not significantly changed except for the "note" which is an addition.

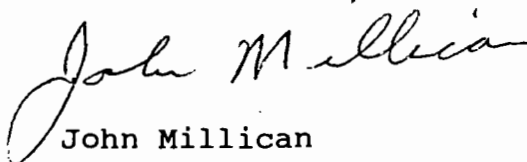
Since there are no visible emission limits in new source performance standards, 40 CFR 60 pertaining to Pulp and Paper industry wet source particulate emissions and there is no non-attainment area classification applicable to Pulp and Paper wet source particulate emissions, the note appears not to affect any currently operating wet source particulate emissions in the pulp and paper industry. Also, EPA deleted opacity limits from NSPS wet sources because "...EPA believes that in most cases an opacity standard would be ineffective." Therefore, we request the note be deleted and the letter mailed without including the note.

This matter has dragged on since February, 1985, when the Environmental Regulation Commission granted the industry's petition for rulemaking. We believe it would be in the best interest of all parties if the issue could be resolved as it has been previously in some affected industry permits.

Mr. R. Bruce Mitchell
May 4, 1992
Page 2

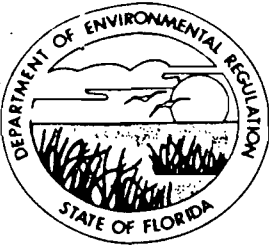
Please call me at 877-0099 to discuss if there is continued reluctance to resolve this issue as requested.

Sincerely,


John Millican

JM/kp

Attachment



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

February xx, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Plant Manager
Mill Name
Address
City, Florida Zip

Dear Mr. _____:

Re: Amendment: Visible Emission Standards Associated with
Particulate Emitting Sources Equipped With Wet
Scrubbers and Exhibiting Wet Plumes Located at
Paper and Pulp Mills

The Department has reviewed letters and supplementary information (attached) submitted by representatives for the paper and pulp industry, which requested interim relief from visible emission standards on particulate emitting sources equipped with wet control systems and exhibiting wet plumes. As a precedent, this request was found to be acceptable in the STIPULATION FOR DISMISSAL OF HEARING (OGC File No. 85-0242) dated August 28, 1985 (attached), between St. Joe Paper Company (now St. Joe Forest Products Company) and the State of Florida Department of Environmental Regulation. Based on the information submitted and the stipulation, the following specific condition shall be incorporated into the air permits of the affected sources:

- o If the Department or its agent observes visible emissions, pursuant to Florida Administrative Code (F.A.C.) Rule 17-2.700(1)(d)1.b. (iii), in excess of 20% [or the applicable limit] opacity, it shall be considered good reason to believe that the applicable mass emission standard is in danger of being violated. Upon such a finding, the permittee shall be required to run a special mass emissions test in accordance with F.A.C. Rule 17-2.700(2)(b); and, such test shall be conducted within 14 days after the Department has notified the permittee, in writing, of the applicability of this permit condition.

Note: This condition shall not be applicable to sources located in nonattainment areas nor sources subject to visible emission standards imposed by the New Source Performance Standards, 40 CFR 60.

Letter
Page Two

Affected source(s) and associated air permit(s):

o	o
o	o
o	o

This letter amendment must be attached to the affected source's air permit, as referenced above, and shall become a part of the permit.

Sincerely,

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

CHF/BM/rbm

Attachments

cc: District (E. Middleswart, NWD)
(A. Kutyna, NED)
(R. Roberson, DCAQD)
G. Smallridge, Esq., DER
T. Cole, Esq., OHF&C
J. Millican, OHF&C

Check Sheet

Company Name: Stone Container Corporation
Permit Number: General
PSD Number: _____
Permit Engineer: _____

Application:

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

Cross References:

- ☐
- ☐
- ☐

Intent:

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

Correspondence with:

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

Final

Determination:

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

Post Permit Correspondence:

- ☐ Extensions/Amendments/Modifications
- ☐ Other



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794

Lawton Chiles, Governor

Carol M. Browner, Secretary

PANAFAX TRANSMITTAL FORM

TO:

Bruce Mitchell

LOCATION:

DARM

FAX
NUMBER:

(904) 922-6979

NUMBER OF PAGES INCLUDING PANAFAX TRANSMITTAL FORM:

5

FROM:

Ed Middlewatt, NW District Air

COMMENTS:

DATE

FAXED:

4/15/92

FAXED
BY:

MBChub

IF THERE ARE PROBLEMS WITH THIS TRANSMITTAL,
PLEASE CALL THE PERSON LISTED ABOVE

SUNCOM 695-8300
FAX NUMBER 432-4093

cc: CBF/BA/PL

4-21-92 @ 9:50 am

Spoke w D. Riley - told him to obtain C.P.s for RB's x2 and SDT's x2; also, to sign a statement of no-mod. since 1/6/75 for RB's x2, SDT's x2, and BtoX sys, pursuant to 40 CFR and 17-2, FAE.

Spoke w Rick Prusa - told him of the direction that will be taken. ^{Ran}

✓ 17-2.500(2)(c)4. ^{Ran}



Stone Container Corporation

Panama City Mill

Containerboard and Paper Division

Post Office Box 2560
Panama City, Florida 32402

*Call in
4110*

(904) 785-4311

April 2, 1992

RECEIVED

APR - 9 1992

Northwest Florida
DER

Mr. Ed Middleswart, Air Programs Supervisor
Florida Department of Environmental Regulation
160 Governmental Center
Pensacola, Florida 32501-5794

Dear Mr. Middleswart:

The additional information concerning our request for increased operating rates for Nos. 1 & 2 recovery boilers and associated dissolving tanks follows.

The need for increased operating rates for these units arises from 2 sets of circumstances. First our productive time has increase from approximately 96% to 97% of available time. The additional operating time has resulted in significantly increased production rates which translates to more black liquor solids to burn in the recovery boilers. The increase in operating efficiency is directly attributable to our predictive maintenance program. We are now able to detect pending failures of major equipment early in the deterioration process. This early detection allows us to schedule repairs before a major failure occurs. Planned maintenance results in less down time as opposed to making repairs on an emergency basis. The second circumstance is the additional liquor generated because of the NCG system. Most of the sulfur in the incinerated NCG gases is captured in the lime kiln. The captured sulfur makes its way into the liquor system and drives the liquor sulfidity well above control limits. The only way to combat the excess sulfidity is to add sodium hydroxide to the liquor system. This produces additional liquor which must be handled in the mill's liquor system.

Emissions data for the requested operating rates are given below.

Permit Number	<i>3000 lb.</i> Tons/Hr. Firing Rate <u>Black Liquor Solids</u>	Emission Rate <u>#Hour</u>
#1 Recovery Boiler-A003-141023	42.75	41.15
#1 Dissolving Tank-A003-141024	42.75	26.97
#2 Recovery Boiler-A003-156518	43.75	44.69
#2 Dissolving Tank-A003-156519	43.75	27.10

2

Page 2
Ed Middleswart
April 2, 1992

Maximum Allowable Emission Rates:

			<u>n1</u>	<u>n2</u>
Recovery Boilers	112.5	LBS/HR.	41.15	44.69.
No. 1 Dissolving Tank	28.52	LBS/HR.	26.97.	
No. 2 Dissolving Tank	28.52	LBS/HR.	27.10.	

If you have questions or comments please contact David Riley at
(904) 785-4311, ext. 257.

Sincerely yours,



L.D. Riley, Jr.
Environmental Superintendent

/car

cc: Jack Prescott
C.F. Bogatie

BEST AVAILABLE COPY



Stone Container Corporation

Panama City Mill

Containerboard and Paper Division

Post Office Box 2560
Panama City, Florida 32402

April 12, 1992

(904) 785-4311

*Ed M
4/15*

Mr. Ed Middleswart, Air Programs Supervisor
Florida Department of Environmental Regulation
160 Governmental Center
Pensacola, Florida 32501-5794

Dear Mr. Middleswart:

Per your request, I have expressed the requested firing rates for our recovery boilers in 2,000 pound tons per hour instead of the paper industry norm of 3,000 pound tons per hours. Please note that the emission rates reported are actual test data at the requested firing rates.

Thank you for your cooperation in this matter.

If you have questions or comments please contact David Riley at (904)785-4311, ext. 257.

Sincerely yours,

L.D. Riley, Jr.

Environmental Superintendent

/smj

cc: Jack Prescott
C.F. Bogatie

RECEIVED
APR 14 1992
Northwest Florida
DER

Firing Rate Tons / Hour Black Liquor Solids	Emissions LBS/hr at Requested Rate	Allowable Emissions Rate LBS/hr
--	---	--

123700
No. 1 Recovery Boiler 3.7% 64.12 128240 41.15 112.50
No. 1 Dissolving Tank 3.7% 64.12 " 26.97 28.52
No. 2 Recovery Boiler 6.1% 65.62 131240 44.69 112.50
No. 2 Dissolving Tank 6.1% 65.62 " 27.10 28.52

Note: Emission rates are actual emissions at the requested operating rates.

Permit Numbers

No. 1 Recovery Boiler: A003-141023
No. 1 Dissolving Tank: A003-141024
No. 2 Recovery Boiler: A003-156518
No. 2 Dissolving Tank: A003-156519

NOMINAL + 600 TPD OF PRODUCTION

INCREASE RECOVERY FURNACE PM, SO₂, TRS, NO_x, CO

INCREASE SMELT TANK PM, SO₂, TRS

LIME KILN PM, SO₂, NO_x, CO

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

1. ☒ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

L. D. Riley, Jr., Environ. Super.
Stone Container Corp.
#1 Everitt Ave.
P.O. Box 2560
Panama City, FL 32402

4a. Article Number

P 710 058 533

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

5-19-92

5. Signature (Addressee)**6. Signature (Agent)****8. Addressee's Address (Only if requested and fee is paid)**

PS Form 3811, October 1990

★ U.S. GPO: 1990-273-881

DOMESTIC RETURN RECEIPT

P 710 058 533

**Certified Mail Receipt**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
L. D. Riley, Jr.	
Env. Super.	
Street & No.	
Stone Container Corp.	
#1 Everitt Ave	
P.O., State & ZIP Code	
P.O. Box 2560	
Panama City, FL 32402	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
mailed: 5/18/92	
Permitting Strategy for RBs and Assoc. SDTs	

PS Form 3800, June 1990



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

File Copy
General

May 14, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. L. D. Riley, Jr.
Environmental Superintendent
Stone Container Corporation
#1 Everitt Avenue
Post Office Box 2560
Panama City, Florida 32402

Dear Mr. Riley:

Re: Permitting Strategy of Existing Sources

In reference to your April 2, 1992 letter (attached), received by the Department's Northwest District on April 9, 1992 (FAX'd to the BAR on April 15th), and phone conversation with Mr. Bruce Mitchell on the permitting strategy of the existing recovery boilers and associated smelt dissolving tanks, the following is recommended:

- o Provide a statement to the Department's Northwest District that each affected source (please identify) has not been modified since January 6, 1975, in accordance with Florida Administrative Code (F.A.C.) Rule 17-2.100, Definitions-Modification, and Title 40, Code of Federal Regulations, Part 60.14, Modification (July, 1991 version);
- o Under a seal of a Florida registered P.E., submit an application to the Department's Northwest District for a construction permit for each affected source to reflect the process/production capacity of each affected source and to establish federally enforceable permit conditions (i.e., public notice requirement). The associated processing fee is the minimum fee for a construction permit pursuant to F.A.C. Rule 17-4.050 (i.e., \$250.00 per source); and,
- o After compliance demonstration requirements, if any, an application for an operation permit(s) shall be submitted to the Department's Northwest District.

Mr. L. D. Riley, Jr.
Page 2

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

Sincerely,

A handwritten signature in dark ink, appearing to read 'C. H. Fancy', written in a cursive style.

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

CHF/BM/rbm

Attachment

cc: E. Middleswart, NWD
G. Smallridge, Esq., DER



Lawton Chiles
Governor

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

May 27, 1994

CERTIFIED, RETURN
RECEIPT REQUESTED

WARNING LETTER
NWAP 03 - 1280

RECEIVED

MAY 31 1994

L. David Riley, Jr.
Environmental Superintendent
Stone Container Corporation
Post Office Box 2560
Panama City, Florida 32402

Bureau of
Air Regulation

Dear Mr. Riley:

A Department representative verified on May 27, that construction had commenced on two new digesters at Stone's Panama City facility. The Department has not received an application to construct these digesters which are sources of air pollution nor has a construction permit been issued for that construction.

It is a violation of Section 403.161(1)(b), Florida Statutes, to fail to comply with a Department regulation. Chapter 17-210.330(1) Florida Administrative Code, requires the owner or operator of any proposed new or modified source to obtain an air construction permit prior to beginning construction.

You are advised that any activity at your facility that may be contributing to violations of State statutes or rules should be ceased immediately. Continued construction or operation of a facility in violation of State statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties up to \$10,000 per violation per day pursuant to Sections 403.141 and 403.161, Florida Statutes.

You are requested to contact Ed K. Middleswart, P.E. of this office at (904) 444-8364 within 10 days of receipt of this Warning Letter to arrange a meeting with Department personnel to discuss the issues raised in this Warning Letter. You may wish to consult an attorney and to have the attorney attend the meeting with the Department.

PLEASE BE ADVISED that this Warning Letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The purpose of this letter is to advise you of potential violations and to set up a mechanism to discuss corrective actions and possible resolutions to any potential violations that may occur for which you might be responsible. If the Department determines that an enforcement proceeding should be initiated in this case, it may be initiated by issuing a Notice of Violation

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1.

Chair Lancy

2.

DAIR

3.

MAGNO 127

4.

MS# 5505

John
~~Preston~~
Bruce
J. ~~mylin~~ 6/17/94

PII

Patty file

This is sad since the requirement
to obtain construction permits for
installing new batch digesters was
established with the company and
its counsel, the NED, and Clair.
RR

XC: D ^{DS}
DIBWNE

FROM:

MS Cule

DATE

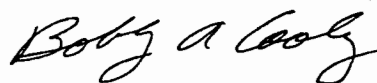
5/27/94

PHONE

Page Two
NWAP03-1280

or by filing a judicial action in accordance with Section 403.121, Florida Statutes. If the Department issues a Notice of Violation, and you are named as a party, you will be informed of your rights to contest any determination made by the Department in the Notice of Violation. The Department can also resolve any violation through entry into a Consent Order.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bobby A. Cooley".

Bobby A. Cooley
District Director

BAC:csc

cc: Clair Fancy, P.E.
Henry Hernandez

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Michael Sorcher
M.A. Associates, Inc.
51 Corporate Woods
9293 W. 110th St., 5th Floor
Overland Park, Kansas 66210

4a. Article Number

P 832 538 745

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

7. Date of Delivery

11-22-91

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

[Signature]

PS Form 3811, October 1990

☆U.S. GPO: 1990-273-861

DOMESTIC RETURN RECEIPT

P 832 538 745

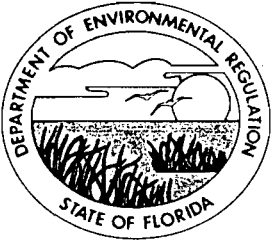


Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Mr. Michael Sorcher	
Street & No.	
9293 W. 110th St., 5th Floor	
P.O., State & ZIP Code	
Overland Park, Kansas 66210	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 11-18-91	
Permit: Stone Container	
TDF Test Burn	

PS Form 3800, June 1990



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

November 15, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Michael Sorcher
M.A. Associates, Inc.
51 Corporate Woods
9293 W. 110th St., 5th Floor
Overland Park, Kansas 66210

Dear Mr. Sorcher:

Re: Request to Conduct a Trial Burn and Subsequent Pollutant Emissions Performance Tests While Utilizing Tire Derived Fuel in Stone Container Corporation's Nos. 3 & 4 Combination Power Boilers

The Department's Bureau of Air Regulation has evaluated your request to obtain permission to conduct a trial burn while utilizing tire derived fuel as a supplemental fuel in the above referenced sources at Stone Container Corporation's facility located in Panama City, Bay County, Florida; and, if successful, then conduct a battery of pollutant emissions performance tests. In light of the letter of August 6, 1991 (attached), the Bureau would like to further clarify some issues related to permitting activity with the Department.

In Florida Administrative Code (F.A.C.) Rule 17-2.210, Permits Required, it states that "the owner or operator of any source which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department prior to beginning construction, modification, or initial or continued operation of the source unless exempted pursuant to Department rule or statute."

In F.A.C. Rule 17- 2.100(147), Definitions-Owner or Operator, is defined as "any person who operates, controls or supervises a stationary source." Since you are the vendor of a product (tire derived fuel) and not the owner/operator of the affected and existing sources, you will need a "letter of authorization" from the owner/operator in order to represent them and act on their behalf in an air permitting activity with the Department (i.e., modification of a source, authorization to conduct testing, etc).



Mr. Michael Sorcher
Page Two

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

Sincerely,

A handwritten signature in dark ink, appearing to read 'C. H. Fancy', written in a cursive style.

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

CHF/BM/rbm

Attachment

cc: E. Middleswart, NWD
D. Riley, SCC
M. Hope, WRI
M. Hewett, DER
B. Mitchell, DER

cc: B. Mitchell } 11-7-91
C. Fancy

RECEIVED
NOV 6 1991
Division of Air Resources Management
INTERNAL REVIEW ONLY

September 23, 1991

Mr. C. H. Fancy, P.E.
Bureau of Air Regulation
Florida Dept. of Environmental Regulation
2600 Blair Steve Rd.
Tallahassee, Florida 32399-2400

RE: Request For Authorization to Conduct a Tire Derived Fuel
Test Burn

Dear Mr. Fancy,

Stone Container is requesting authorization from DER's Air Quality Section to conduct a test burn using tire derived fuel (TDF) in our #3 & #4 combination power boilers. Waste Recovery, Inc.'s (WRI) TDF is specified as 96% wire free, 2" minus particle size, having a Btu value of approximately 15,500 per pound, and a 1.2% sulfur content. As you may know, we normally burn a combination of oil, wood and coal in one boiler, and oil and wood in the other boiler. Oil has a sulfur content of 2.1%. Coal has a sulfur content of .9% with a Btu value of 12,000 to 13,000 per pound. Our wood fuel has an energy value of 4,730 Btu's/lb. and a sulfur content of .01%.

A proximate and ultimate analysis of TDF compared to that of oil and coal, and an assessment of industry's current experience using TDF, shows that TDF will not significantly change the residue (ash) entering our waste water and ash handling systems. However, since TDF contains 1.5% zinc, our test will evaluate zinc levels in our waste systems. Bobby Cooley, DER's water facility administrator, has given approval to conduct these tests.

We plan to meter the TDF onto our wood fuel conveyor using WRI's metering unit for strict control. This will not require any physical changes to the system or any major modifications in the operation of the boiler. Wood fuel will be run at its normal rate while substituting TDF for oil and/or coal on a heat input basis at 0, 5, 10, and 20, increments in each boiler.

Our test burn is proposed for a total of 45 days, Phase I operational and Phase II environmental, giving us adequate time to evaluate operational issues, monitor our waste water system given its' normal retention time, and to conduct air compliance testing. Subsequent to achieving satisfactory operational control in Phase I, we will begin Phase II to measure air emissions at each TDF heat input replacement rate per the attached test plan. Actual heat input replacement rates will be determined from the results of the operational tests.

EXTREMELY URGENT SHIPMENT FROM:	
NAME	TELEPHONE
	503-293-2261
COMPANY	
WASTE RECOVERY INC.	
STREET ADDRESS	INVOICE/ORDER NO.
3501 W BIRCH ST	
CITY	STATE ZIP CODE
PORTLAND	OR 97217
NEXT DAY DELIVERY TO:	
NAME	TELEPHONE
C. H. FANCY, P.E.	
COMPANY	
Bureau of Air Reg. Dept of Environmental	
STREET ADDRESS	DEPT./FLOOR
2600 Blair Street Rd	
CITY	STATE ZIP CODE
Tallahassee Florida	32399-2400
TRACKING NO.	
1760 0951 501	

UNITED PARCEL SERVICE CO. LOUISVILLE, KY

B

DRAFT
INTERNAL REVIEW ONLY

Our goal is to identify at what upper limit TDF can be used to substitute for other fossil fuels without significant impacts.

Should Stone Container's tests prove successful to burn TDF on a long term basis, we would then move to make formal application to amend our air permit to allow for our use of TDF within the parameters established by our test results.

If you have any questions regarding this request or require additional information, please call me at -----.

Sincerely,

DRAFT
INTERNAL REVIEW ONLY

Test Plan

Scope - The intent is to operational test tire derived fuel and confirm it's savings potential for Stone Container's co-fired power boilers #3 & #4. This test will demonstrate the viability of TDF in these boilers as a replacement or supplemental fuel from both an operational and environmental standpoint. Furthermore, we expect to see an additional benefit of TDF increasing the efficiency of wood burning.

A logical sequence of events is being proposed to first test operational parameters and then test environmental criteria and non-criteria pollutants. Once operational tests prove successful, then justification for environmental testing can be sustained. It is generally assumed that operational testing as proposed here will pose little risk to the daily operation of the power boilers. Environmental testing and the subsequent permitting activities will be justified on the merits of the operational test.

The entire test is being proposed in two (2) phases, Phase I is an operational test, and Phase II is an environmental test involving stack and ash sampling for compliance and permitting. Phase I will test for ultimate compatibility with fuel conveying system and boiler operation. Phase I will be an operational trial leading into Phase II. Phase II may immediately follow Phase I or some interim time may be required to set up test crew and coordinate with annual maintenance activity. Details of the 2 Phases are as follows:

Phase I - Operational Test TDF will be fed to the wood fuel conveying system by a TDF metering unit. The TDF metering unit will be charged by a front end loader. The TDF metering unit having a variable speed controller will be interlocked into the wood feed system thus providing strict control of TDF feed rates.

DRAFT
INTERNAL REVIEW ONLY

Details:

Quantity of TDF; + 0, 5, 10, & 20% by heat input basis
or as determined to be appropriate
by operational tests.

Duration; 30 day(s)

Observations; + fuel conveyance
+ magnetic/metal detectors
+ segregation in boiler feeder bin(s)
+ stoker system/grate distribution
+ grate temperatures
+ air controls
+ ash characteristics & handling
+ scrubber performance
+ boiler efficiencies
+ waste water treatment

Phase II - Environmental Compliance Testing to cover stack emissions and ash disposal. Waste Recovery's TDF metering system will assure specific feed rates at incrementally higher levels and demonstrate adequate control to Florida's DER. Three test series for each stack are proposed to include one background one at a moderate TDF feed rate and one at a high TDF feed rate. Based on positive results, make application with Florida DER for permit modification to use TDF.

Details:

Quantity of TDF; 0, 10, 20% by heat input basis (or as
determined by Phase I trials)

Duration; 15 days

Observation/Test Plan

I Site tests for boiler #3 & #4 each having an individual stack. There will be a series of three test ranges, one test at baseline with no TDF addition and two more to include the specified heat replacement ranges. Each test will be done in triplicate for a total of nine tests on each stack for pollutant criteria as established by DER.

DRAFT
INTERNAL REVIEW ONLY

A. Three test runs are to establish baseline emission levels while burning a normal "mix" of fuels. Per stack, six test runs are for triplicate evaluation of two predetermined addition levels of TDF. Wood feed will be held at constant baseline levels. Oil and/or coal feed will be reduced as necessary to maintain SO₂ emissions at or below permit levels. Process operating conditions would be as follows:

1. Baseline testing - 3 runs
2. Tire feed condition 1 - 3 runs
3. Tire feed condition 2 - 3 runs

B. Operational parameters for the boiler(s) and wet scrubbers will be collected during each test run to include fuel feed rates, steam load, percent O₂, grate temperature, combustion gas temperature, etc. Refer to "Summary of Methodology" for complete list of parameters to be tested.

II Off Site Tests for each boiler.

A. Analysis of the four different fuel composites using ASTM methods (i.e. oil, wood, coal & TDF).

Phase II testing program will demonstrate:

- 1) Emissions will be receiving best practical treatment.
- 2) Emissions will not violate applicable emission standards.
- 3) Emissions either alone or in conjunction with existing emissions will not violate applicable ambient air quality standards.

SUMMARY OF METHODOLOGY

DRAFT
INTERNAL REVIEW ONLY

Methodology

Information Obtained

EPA Methods 1 -4

Engineering Data
(O₂, CO₂, N₂, H₂O,
volumetric flow)

EPA Method 5

Particulate matter emission
concentration and mass rate
(filter and pre-filter
catch), plasma metals
including Aluminum, Arsenic,
Cadmium, Lead, Zinc, Barium,
Copper, Nickel, Iron,
Vanadium

EPA Method 6C

Sulfur Dioxide

EPA Method 7E

Nitrogen Oxides

EPA Method 9

Visible Emissions

EPA Method 10

Carbon Monoxide

EPA SW 010
(Semi-VOST)

Semi-Volatile Organics
(Speciated), PAH Compounds
and PCDDS/PCDFS

EPA SW 030
(VOST)

Volatile Organics
(Speciated)
Benzene

EPA Method 201A

PM₁₀

EPA Method 101A

Mercury

Bruce M.



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

August 6, 1991

Mr. Michael Sorcher
M.A. Associates, Inc.
51 Corporate Woods
9293 W. 110th St., 5th Floor
Overland Park, Kansas 66210

Re: Performance Test(s) to Determine the Feasibility of Burning
Tire Derived Fuel (TDF) in Stone Containers' Panama City Mill,
No. 3 B&W and No. 4 C.E. Combination Boilers

Dear Mr. Sorcher:

Although your company expects that there will be no actual pollutant emission increases from firing mixtures of oil, wood and coal with TDF, the Nos. 3 and 4 combination power boilers are not permitted to fire these fuel mixtures. Such claims will have to be verified through performance testing. Once it is established that the addition of TDF does not significantly affect pollutant emissions, the applicant can submit a proposal to modify the construction permits accordingly.

The performance test shall be subject to specific conditions to be set by the Department when and if authorization to Conduct Performance Test(s) on Nos. 3 and 4 combination power boilers is given. A proposal from the applicant, sealed by a P.E. registered in the state of Florida, is required to proceed with the performance test authorization. Included with the proposal will need to be fuels data including: heat capacity, sulfur content, and fuel rate. Scrubber operating parameters and estimated time required to perform testing are also required. An application fee of \$250 should be submitted with the proposal. Also, a summary of test parameters is provided for your review.

If you have any questions regarding this letter or require additional information, please call Michael Hewett at 904-488-1344.

Sincerely,

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

CHF/MH/plm

Mr. Michael Sorcher
Page 2 of 2

c: M. Hewett, DER
B. Mitchell, DER
G. Smallridge, DER
E. Middleswart, NWD
D. Riley, Stone Container Corp.
J. Harper, EPA
C. Harper, NPS

SUMMARY OF TEST PARAMETERS

Particulate Matter	EPA Method 5
PM ₁₀	EPA Method 201A
Visible Emissions	EPA Method 9
Metals:	EPA Method 5 (filter and probe rinse)
Aluminum	Barium
Arsenic	Copper
Cadmium	Nickel
Chromium (total)	Iron
Lead	Vanadium
Zinc	
NO _x	EPA Method 7
Sulfur Dioxide	EPA Method 6 (in back half of Method 5 train)
Carbon Monoxide	EPA Method 10
Volatile Organic Compounds	VOST
Semi-Volatile Organic Compounds	Modified Method 5
CO ₂ /O ₂	EPA Method 3
Stack Gas Flow/Moisture/Temp.	EPA Methods 2 and 4 (in conjunction with EPA Method 5)
PCDDS/PCDFS	EPA Method 23
PAH	Modified Method 5
Benzene	EPA Method 18
Mercury	EPA Method 101 or 101A