

## Check Sheet

Company Name: St. Joe Forest Products  
Permit Number: AE VE STD NET PLUME SOURCES.  
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

**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.

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:

Robert E. Nedley, Pres.  
St. Joe Forest Products Co  
PO Box 190  
Port St. Joe, IN 46784-0190

## 4a. Article Number

P 710 058 502

## 4b. Service Type

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

## 7. Date of Delivery

## 5. Signature (Addressee)

Eric Mo Nain

## 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**

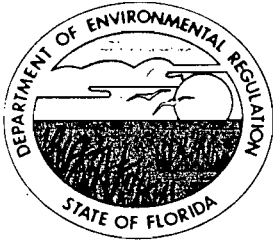
P 710 058 502

**Certified Mail Receipt**

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

Sent to	
Robert Nedley	
Street & No.	
St. Joe Forest	
P.O., State & ZIP Code	
Port St. Joe, IN	
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	7-8-92

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. Robert E. Nedley  
President  
St. Joe Forest Products Company  
Post Office Box 190  
Port St. Joe, Florida 32456-0190

Dear Mr. Nedley:

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.

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

- o Nos. 5 & 6 Smelt Dissolving Tanks      o AO 23-164869
- o No. 7 Smelt Dissolving Tank              o AO 23-164848

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.

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

Mr. Robert E. Nedley

Page 3

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)

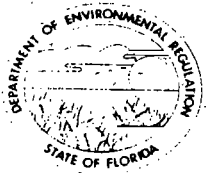
Comment: The request was to delete the "Note" associated with the proposed Specific Condition, since the only affected source had its control system changed such that its exhaust no longer had moisture interference.

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. )

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION, )

Respondent. )

OGC FILE NO. 85-0242

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

G. Gary Early  
GARY EARLY

Attorney for Respondent

Date: 08/28/85

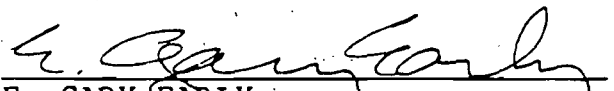
Terry Cole  
TERRY COLE

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

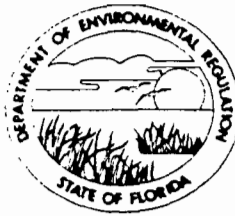
On behalf of ST. JOE PAPER  
COMPANY and the FLORIDA  
PULP AND PAPER ASSOCIATION



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

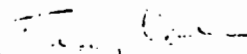
Dear Gary:

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:nhg

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. R. 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

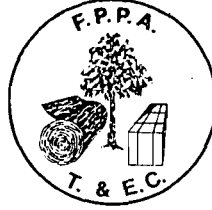
ATTACHMENT 5



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.

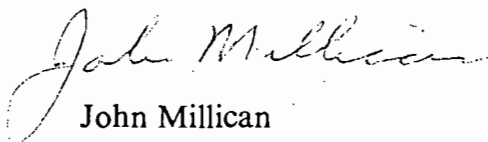
The benefit to the Department is to provide an orderly process for rule making void of any deadline for action. The mutual benefit to the industry and the Department is to provide the permit condition to the industry permits which was agreed to in the stipulation contained in OGC File No. 85-024. This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



John Millican  
Executive Director  
FPPA T&E Committee

JM/Fancy.ltr/sj

xc: FPPA T&E Committee  
Mr. Terry Cole

~~CONFIDENTIAL~~

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.

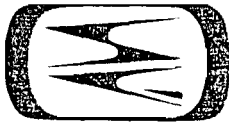
Thank you for your assistance and cooperation in expediting your review of our June 25 request. We would appreciate your agreement with our request.

Sincerely,

*John Millican*  
John Millican *by JMS*

JM/dg/1197

Attach.



## CONTAINER CORPORATION OF AMERICA

AN AFFILIATE OF JEFFERSON SMURFIT CORPORATION

July 30, 1991

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

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

RECEIVED

AUG 2 1991

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

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

## 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 SO<sub>2</sub> 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 Dissovling 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	AO23-175311	Ducon Venturi	23,000	14,000
#2 Lime Kiln	AO23-175315	" "	"	"
#3 Lime Kiln	AO23-175314	" "	"	"
#5 & 6 Smelt Tank Scrubber	AO23-164869	Ducon	23,000	18,000
#7 Smelt Tank Scrubber	AO23-164848	"	43,000	26,000

Lime Kiln Scrubbers use H<sub>2</sub>O as scrubber medium at a pH  $\geq$  12.5.

Lime kiln type & model:

Ducon Oriclone High  $\Delta$  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

A016-749235

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

pH 8-9

No. 2 Bark Boiler

A016-149236

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

pH 89

No. 1 Lime Kilns

A016-174975

No. 2 Lime Kilns

A016-174976

No. 3 Lime Kilns

A016-174977

Medium - water recirculating with hot water makeup

pH 8.5 - 9.5

No. 1 Recovery Boiler

A016-159612

No. 2 Recovery Boiler

A016-159615

No. 3 Recovery Boiler

A016-159616

Medium - water recirculating with fresh water makeup

pH 7.0 - 8.0

No. 1 Smelt Tank Vents

A016-155786

No. 2 Smelt Tank Vents

A016-155787

No. 3 Smelt Tank Vents

A016-155788

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

pH 11.0 - 12.0

No. 3 Slaker

A016-155275

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 JPS*

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	AO17-146028	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	AO17-145038	10PEN17004237	Venturi	FMC Type T1 model 280X	221000	147000	Fresh water **	>5.5	Scrubber pressure drop: 3-hour average => 10.0" of water
No. 1 smelt diss. tank	AO17-181734	10PEN17004232	Venturi	Air Pol	23400	12100	Weak Wash	*	None
No. 2 smelt diss. tank	AO17-181735	10PEN17004238	Venturi	Air Pol	19300	7300	Weak Wash	*	None
Line Kiln	AO17-181738	10PEN17004228	Venturi	Air Pol. model LX12D	62500	32000	Fresh water	*	Scrubber pressure drop: 12-hour average => 26" of water
Line Calciner	AO17-151541	10PEN17004236	Venturi	Dorr Oliver	20800	13000	Fresh water	*	Scrubber pressure drop: 12-hour average => 24" of water
Line Slaker	AO17-137615	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

DEPARTMENT OF REGULATORY &  
ENVIRONMENTAL SERVICES  
Air Quality Division

Division of Air  
Resources Management



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.

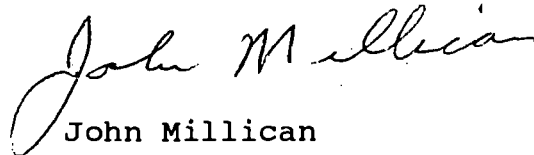
This matter has dragged on since February, 1985, when the Environmental Regulation Commission granted the industry's petition for rulemaking. We believe it would be in the best interest of all parties if the issue could be resolved as it has been previously in some affected industry permits.



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

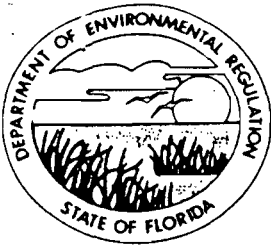
Please call me at 877-0099 to discuss if there is continued reluctance to resolve this issue as requested.

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

**DRAFT**

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

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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  
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