

P 062 921 933



Receipt for Certified Mail

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

Sender	
Wayne Barlow	
Street and No.	
Container Corp. of America	
P.O. State and ZIP Code	
Fernandina Bch, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 12-17-92	
AC 45-190382	
PSD-FI-165	

PS Form 3800, June 1991

Fold at the over top of envelope to this line

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 below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

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. Wayne Barlow, VP
Container Corp. of America
P O Box 2000
Fernandina Bch, FL
32034

4. Article Number: P 062 921 933

4b. Service Type

Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery: 12-22

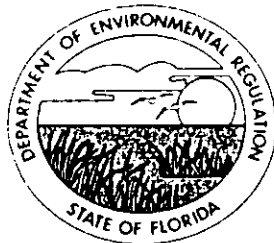
5. Signature (Addressee)

6. Signature (Agent): *[Signature]*

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

PS Form 3811, November 1990 *U.S. GPO: 1991-287-066 **DOMESTIC RETURN RECEIPT**

File Copy



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

December 17, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Wayne Barlow
Vice President and General Manager
Container Corporation of America
Post Office Box 2000
Fernandina Beach, Florida 32034

Dear Mr. Barlow:

Re: Amendment to the Construction Permit
No. 8 Batch Digester: AC 45-190382 and PSD-FL-165

The Department has reviewed Ms. Carla L. Gay's letter of October 12, 1992, which requested changes to the above referenced construction permits. The request is acceptable and the following will be changed and/or added:

SPECIFIC CONDITIONS:

No. 2.:

FROM: The emissions from the No. 8 batch digester system (BDS), as defined in 40 CFR 60.281(d), shall be collected and transported by the noncondensable gas handling system to the incinerator (No. 4 Lime Kiln) in accordance with 40 CFR 60.283(a)(1)(iii).

TO: The emissions from the No. 8 batch digester system (BDS), as defined in 40 CFR 60.281(d), shall be collected and transported by the noncondensable gas handling system to the incinerator (No. 4 Lime Kiln) in accordance with 40 CFR 60.283(a)(1)(i) and 40 CFR 60.283(a)(5).

No. 5.:

FROM: All TRS gases burned in the TRS incinerator shall be subjected to a minimum temperature of 1200°F for at least 0.5 second. A device to continuously monitor and record the combustion temperature at the point of incineration shall be installed pursuant to all applicable requirements of 40 CFR 60.284(b)(1).

Mr. Wayne S. Barlow
Amendment to AC 45-190382 (PSD-FL-165)
December 17, 1992
Page 2 of 3

TO: The back-up TRS control system to the No. 4 Lime Kiln is a wet scrubber system, which uses white liquor as the scrubbing medium.

Attachment to be Incorporated:

- o Ms. Carla L. Gay's letter with enclosures received October 15, 1992.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (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. Wayne S. Barlow
Amendment to AC 45-190382 (PSD-FL-165)
December 17, 1992
Page 3 of 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, Florida Administrative Code.

This letter must be attached to air construction permit, No. AC 45-190382 (PSD-FL-165), and shall become a part of the permit.

Sincerely,



Carol M. Browner
Secretary

CB/BM/rbm

Attachment

cc: A. Kutyna, NED
J. Braswell, Esq., DER
C. Gay, CCA
D. Buff, P.E., KBN



CONTAINER CORPORATION OF AMERICA

AN AFFILIATE OF JEFFERSON SMURFIT CORPORATION

Mill Division
NORTH 8TH STREET
FERNANDINA BEACH, FL 32034
TELEPHONE: 904/261-5551

October 12, 1992

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

RECEIVED

OCT 15 1992

Subject: No. 4 Lime Kiln
Permit AO45-188176 Revision Division of Air
Resources Management

Dear Mr. Mitchell,

As discussed by telephone, the No. 4 lime kiln operating permit No. AO45-188176 was recently revised to include the No. 8 batch digester in the NCG system that is collected and transported to the No. 4 lime kiln for TRS control. In the revision, specific conditions No. 13 and No. 14 were added to the lime kiln operating permit, requiring the monitoring and reporting of kiln combustion temperature. In a telephone conversation with Mr. Johnny Cole on September 15, 1992, CCA objected to specific conditions No. 13 and No. 14 and requested that No. 13 be deleted and No. 14 be changed to reference 40 CFR 283(a)(1)(i) and 283(a)(5) on the basis that

- the referenced Federal NSPS in 40 CFR 60.284(b)(1) and 40 CFR 60.283(a)(1)(iii) apply to combustion of TRS gases in existing sources that have no TRS CEM requirements,
- the new batch digester and the No. 4 lime kiln are subject to the NSPS in subpart BB and the specifically the requirements of 40 CFR 60.283(a)(1)(i) and 40 CFR 283(a)(5),
- TRS CEM monitoring and reporting requirements demonstrate compliance,

In subsequent telephone conversations with the Northeast District, Mr. Johnny Cole stated that the temperature monitoring requirements were specific conditions in the batch digester construction permit No. AC 45-190382 issued by Tallahassee. Mr. Cole recommended contacting Tallahassee to discuss the temperature monitoring issue. To allow time to resolve these permit issues, a petition for an extension of time was requested and granted on September 30, 1992, giving CCA until November 4, 1992 to file a petition for hearing.

Although the batch digester construction permit does require incineration of TRS gases at a minimum temperature of 1200 deg. F, the permit specific condition No. 5 states that the device to monitor and record temperature shall be installed "pursuant to all applicable requirements of 40 CFR 60.284(b)(1)." The requirements of 60.284(b)(1) require temperature monitoring only "where the provisions of 60.283(a)(1)(iii) apply." The provisions of 60.283(a)(1)(iii) apply when TRS gases are "combusted in a lime kiln or recovery boiler "not subject to the provisions of this subpart" (subpart BB). The lime kiln is a new source, subject to the provisions of subpart BB. The appropriate NSPS for the batch digester are in 60.283(a)(1)(i) which allow the batch digester to discharge gases for combustion in a lime kiln subject to 60.283(a)(5). No. 4 lime kiln is subject to 60.283(a)(5) which requires the lime kiln gases to meet the 8 ppm TRS limit.

Enclosed are copies of the following items:

lime kiln construction permit, operating permit, and recent revision

batch digester construction permit, and

Order granting a time extension to November 4, 1992 to file a petition for hearing.

In summary, the lime kiln CEM monitoring and reporting requirements are adequate to demonstrate compliance. Temperature monitoring requirements cited in the batch digester construct permit and in the revised lime kiln permit are limited to combustion of TRS gases in existing sources or incinerators not subject to NSPS. Both the new batch digester and No. 4 lime kiln are subject to the NSPS in Subpart BB and consequently, TRS CEM data is recorded and reported quarterly to the DER. Therefore, the specific conditions No. 13 and 14 in the revised No. 4 lime kiln operating permit should be revised accordingly. Hopefully this issue can be resolved without a hearing.

If you have questions, please contact me at (904) 277-5807.

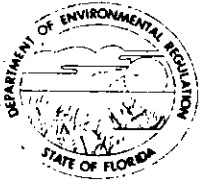
Sincerely,



Carla L. Gay
Environmental Supervisor

CLG/sl

Enclosures:



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: Carol Browner
FROM: Howard L. Rhodes *[Signature]*
DATE: December 14, 1992
SUBJ: Amendment to Construction Permit
Container Corporation of America
No. 8 Batch Digester: AC 45-190382 (PSD-FL-165)

Attached for your approval and signature is an amendment prepared by the Bureau of Air Regulation for the above referenced company.

The amendment will reflect the TRS (total reduced sulfur) standard in the federal regulation (i.e., 40 CFR 60, Subpart BB) that applies to the new No. 4 Lime Kiln as the primary TRS gas incinerator system, instead of the original citing that depicted a general incinerator system. The amendment also recognizes a wet scrubber system, using white liquor as the scrubbing medium, as the backup TRS control system to the No. 4 Lime Kiln. The facility is located in Fernandina Beach, Nassau County, Florida.

There is no controversy associated with the proposed amendment. I recommend your approval and signature.

CB/BM/rbm

Attachment



CONTAINER CORPORATION OF AMERICA

AN AFFILIATE OF JEFFERSON SMURFIT CORPORATION

Mill Division

NORTH 8TH STREET
FERNANDINA BEACH, FL 32034
TELEPHONE: 904/261-5551

October 12, 1992

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

RECEIVED

OCT 15 1992

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Resources Management

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FEDERAL EXPRESS

QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

1801068835

1346M

1801068835

Date
10/14

RECIPIENT'S COPY

From (Your Name) Please Print Carla Gay Company		Your Phone Number (Very Important) (904) 277-5807 Department/Floor No	To (Recipient's Name) Please Print Mr. Bruce Mitchell Company		Recipient's Phone Number (Very Important)
Street Address CONTAINER CORP OF AMERICA		Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes)		Department of Environmental Regulation	
City 8TH ST	State	City 2600 Blair Stone Road	State	ZIP Required	
HERNANDINA BEACH FL		Tallahassee FL		32034	
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice.)			IF HOLD FOR PICK-UP, Print FEDEX Address Here		
PAYMENT 1 <input type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct No 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct No 4 <input type="checkbox"/> Bill Credit Card			Street Address		
5 <input type="checkbox"/> Cash/Check			City State ZIP Required		

4 SERVICES (Check only one box)		5 DELIVERY AND SPECIAL HANDLING (Check services required)		6 PACKAGES WEIGHT & POUNDS (Day) YOUR DECLARED VALUE		Emp No Date Federal Express Use			
Priority Overnight (Delivery by next business morning) 11 <input type="checkbox"/> YOUR PACKAGING 16 <input checked="" type="checkbox"/> FEDEX LETTER 12 <input type="checkbox"/> FEDEX PAK * 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE Economy Two-Day (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY Standard Overnight (Delivery by next business afternoon) 51 <input type="checkbox"/> YOUR PACKAGING 56 <input type="checkbox"/> FEDEX LETTER * 52 <input type="checkbox"/> FEDEX PAK * 53 <input type="checkbox"/> FEDEX BOX 54 <input type="checkbox"/> FEDEX TUBE Government Overnight (Delivery by next business day) 46 <input type="checkbox"/> GOVT LETTER 41 <input type="checkbox"/> GOVT PACKAGE Freight Service (See label for details) (Additional charges apply) 70 <input type="checkbox"/> OVERNIGHT FREIGHT ** 80 <input type="checkbox"/> TWO-DAY FREIGHT **		1 <input type="checkbox"/> HOLD FOR PICK-UP (1 & 2 day) (H) (H) 2 <input type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (1 & 2 day charges) (H) (H) (H) 4 <input type="checkbox"/> DANGEROUS GOODS (1 & 2 day charges) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE (1 & 2 day charges) Lbs 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (1 & 2 day charges) 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> HOLIDAY DELIVERY (1 & 2 day charges)		Total Total Total DIM SHIPMENT (Chargeable Weight) _____ lbs Received At 1 <input type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input type="checkbox"/> On-Call Stop 5 <input type="checkbox"/> Station 4 <input type="checkbox"/> BSC		Emp No _____ Date _____ <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg To Del <input type="checkbox"/> Chg To Hold Street Address _____ City _____ State _____ Zip _____ Received By _____ Date/Time Received _____ FedEx Employee Number _____ Release Signature _____ FedEx Emp No _____ Date/Time _____		Base Charges _____ Declared Value Charge _____ Other 1 _____ Other 2 _____ Total Charges _____ REVISION DATE 6/91 PART #11/204 FEM11/91 FORMAT #099 099 © 1990-91 FEDEX PRINTED IN U.S.A.	

Although the batch digester construction permit does require incineration of TRS gases at a minimum temperature of 1200 deg. F, the permit specific condition No. 5 states that the device to monitor and record temperature shall be installed "**pursuant to all applicable requirements of 40 CFR 60.284(b)(1).**" The requirements of 60.284(b)(1) require temperature monitoring only "where the provisions of 60.283(a)(1)(iii) apply." The provisions of 60.283(a)(1)(iii) apply when TRS gases are "combusted in a lime kiln or recovery boiler "**not subject to the provisions of this subpart**" (subpart BB). The lime kiln is a new source, subject to the provisions of subpart BB. The appropriate NSPS for the batch digester are in 60.283(a)(1)(i) which allow the batch digester to discharge gases for combustion in a lime kiln subject to 60.283(a)(5). No. 4 lime kiln is subject to 60.283(a)(5) which requires the lime kiln gases to meet the 8 ppm TRS limit.

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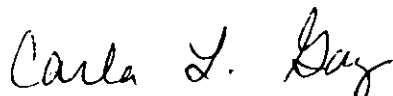
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If you have questions, please contact me at (904) 277-5807.

Sincerely,



Carla L. Gay
Environmental Supervisor

CLG/sl

Enclosures:



United States Department of the Interior
FISH AND WILDLIFE SERVICE



MAILING ADDRESS:
Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225

STREET LOCATION:
134 Union Blvd.
Lakewood, Colorado 80228

IN REPLY REFER TO:

RW Air Quality
Mail Stop 60130

MAR 27 1991

RECEIVED
APR 1 1991
DER-BAQM

Mr. C.H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

We have reviewed the Final Determination pertaining to construction permits AC 45-190382 and 45-190383 for Container Corporation of America (CCA). These permits are for the construction and operation of a new batch digester system (C-line) at CCA's facility in Nassau County, Florida. The facility is located approximately 63 km east of Okefenokee Wilderness Area and 74 km south of Wolf Island Wilderness Area. Both are class I air quality areas administered by the U.S Fish and Wildlife Service. You may recall that in our letter of January 31, 1991, we raised some specific concerns regarding CCA's dispersion modeling methodology. We offer the following follow-up comments for your consideration.

First, we still believe that it was inappropriate to use a sulfur dioxide (SO₂) half-life in the CCA modeling analysis. The Final Determination justifies using this method because of its use on the St. Johns River Power Park project in Jacksonville, Florida. This method was inappropriate then, as it is now. As stated in our January 31, 1991, letter, the EPA Guidelines on Air Quality Models (Revised 1986) supports our conclusion that a half-life to account for chemical transformation is not an accepted modeling method for this situation because: 1) the modeling analysis submitted for assessing impacts in class I areas was done for a rural, not an urban, application using the rural mode in ISCST; 2) the class I areas are within a few hours of the source; and 3) appropriate documentation from site-specific studies for the coefficient which was used, was not provided.

The Final Determination also states that when eliminating the half-life for SO₂, in computer dispersion modeling, four violations of the 24-hour SO₂ increment are predicted in the Okefenokee National Wilderness Area in Georgia. We assume the States of Florida and Georgia will revise their respective State Implementation Plans (SIP) addressing these predicted increment violations to conform with the mandates of the Clean Air Act. Please provide us with the schedule for these SIP revisions.

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. Clewe CH
2. Tom OR
3. Max
4. Larry

~~Larry~~
 FYI +
 return to
Patty

Remarks:

Larry
 1. Patty Adams - BAR
 Please review, initial and forward.
 Return to Patty for filing.
Harbo,

From

Bruce Mitchell

Date

4-1-91

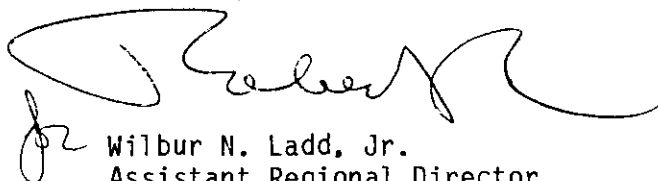
Phone

Second, regarding the use of significant impact levels, although CCA's contribution to the predicted increment violation may be less than 0.001 ug/m³, CCA is a contributor to air quality degradation in the area on a cumulative basis. Our concern over the potential air pollution impacts at Okefenokee Wildlife Refuge continues, and once the effects threshold is reached, any increase, even 0.001 ug/m³, in refuge concentrations may be considered "significant" and/or "adverse". We are approaching the threshold for effects on sensitive resources at the refuge.

In the enclosure to our January 31, 1991, letter, we discussed in detail our concerns with the use of predetermined significant impact levels with respect to class I impacts. Basically, these significance criteria may not offer the protection we need to be assured that a particular project will not adversely affect the refuge. It is the Federal Land Manager's responsibility to determine if a proposed project would significantly impact a class I area. Therefore, for future class I impact analysis, we ask that you and permit applicants consult with us before concluding a certain impact level is "insignificant".

We await a written reply from you regarding the above comments. If you have questions regarding this matter, please contact Sandra Silva of our Air Quality Branch at (303) 969-2814.

Sincerely,



Wilbur N. Ladd, Jr.
Assistant Regional Director
Refuges and Wildlife, Region 6

cc: Jellell Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division
U.S. EPA, Region 4
345 Courtland St., NE
Atlanta, Georgia 30365

cc: Cleve Holladay
Tom Rogers
Larry George
Steve Smallwood
BAICAF } 4-1-91 RAL
David Buff 4-3-91 RAL