

P 407 853 172

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1989-234-555

Sent to	Wayne Barlow
Street and No.	C.A.
P.O., State and ZIP Code	N. 8th St.
Postage	Geraldine Beach
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	2-20-91
	AC 45-190382
	" 190383

PS Form 3800, June 1985

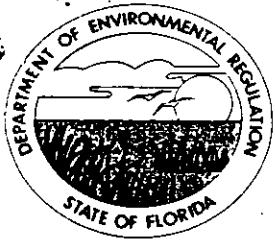
**SENDER** Complete items 1 and 2 when additional services are desired; and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)  
2.  Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Wayne Barlow, V.P. Continier Corp. of America North 8th St. Geraldine Beach, FL 32304	4. Article Number P 407 853 172
5. Signature -- Addressee X	Type of Service: <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
6. Signature -- Agent X	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery 21-91	8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3800, June 1985



BDFL-165

# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMITS

Mr. Wayne Barlow, V.P. & General Manager  
Container Corporation of America  
North 8th Street  
Fernandina Beach, Florida 32034

February 20, 1991

Enclosed are construction permits AC 45-190382 and 45-190383 for Container Corporation of America to construct/install one new batch digester system (No. 8) and a new brown stock washer system (C-Line) at their facility in Nassau County, Florida. These permits are issued pursuant to Section 403, Florida Statutes.

Any party to these permits has the right to seek judicial review of the permits pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

---

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

Copy furnished to:

- A. Kutyna, NED
- J. Harper, EPA
- C. Shaver, NPS
- R. Collom, Jr., GaEPD
- D. Buff, P.E., KBN
- T. Cole, OHF&C

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 2-20-91.

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

Lynda Jaben 2-20-91  
Clerk Date

Final Determination

Container Corporation of America  
Nassau County  
Fernandina Beach, Florida

Construction Permit Numbers

AC 45-190382

AC 45-190383

PSD-FL-165

Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

February 19, 1991

## Final Determination

The Technical Evaluation and Preliminary Determination for the permits to construct a batch digester system (No. 8) and a brown stock washer system (C-Line) at Container Corporation of America's (CCA) facility located in Fernandina Beach, Nassau County, Florida, was distributed on December 20, 1990. The Notice of Intent to Issue was published in the News-Leader on December 26, 1990. Copies of the evaluation were available for public inspection at the Department's Northeast District office and Bureau of Air Regulation (BAR) office.

Comments were received during the Public Notice period on the Department's Intent to Issue the permits. Also, additional information was received during the Public Notice period. The Department will list each letter received in the chronological order of receipt. Where a response is required, it will be addressed in the order that the comment is presented, but will not be restated.

1. Mr. Wayne Barlow's letter dated January 4, 1991, and received on January 4, 1991, at a meeting held at the BAR.

a. No. 8 Batch Digester System (BDS): AC 45-190382

### SPECIFIC CONDITIONS:

(1). No. 3.: Response

The source will have to demonstrate compliance with the emission limiting standard in accordance with 40 CFR 60.283(a)(1) if CCA has to abandon its current control strategy (incineration) and reverts to emitting TRS emissions into the atmosphere and allowable emissions have to be established for the total BDS. Therefore, no change will be made.

(2). No. 5.: Response

Based on the fact that other sources at the mill could be candidates to incinerate the TRS gases, it was decided to leave this condition as originally stated. Therefore, no change will be made.

(3). No. 13.: Response

Based on an appropriate Specific Condition contained in previously issued construction permits for this facility, the following will be changed:

From: Based on the SO<sub>2</sub> post-test results (actuals) established from the specific condition requirements contained in Construction Permits Nos. AC 45-141871, -141872, -141873 and -141877, a PSD SO<sub>2</sub> allowable emission limitation shall be established for the No. 4 lime kiln and its construction permit (AC 45-141877) shall be amended.

To: Based on the SO<sub>2</sub> pre- and post-test results (actuals) established from the specific condition requirements contained in Construction Permits Nos. AC 45-141871, -141872, -141873 and -141877, a SO<sub>2</sub> net emission change shall be established for the TRS gas incinerator to rule out or require further emissions review pursuant to F.A.C. 17-2.500, PSD, and to assess the appropriate processing fee(s) pursuant to F.A.C. Rule 17-4.050 for the TRS noncondensable gas handling system's associated sources.

(4). No. 14.b.: Response

Because of the on-going modeling issues associated with the No. 5 Power Boiler and the facility, it is not yet known what the allowable pollutant emissions from the No. 5 Power Boiler or facility will be. Consequently, there would be a delay in the issuance of these permits were the No. 5 Power Boiler tied to this permitting activity. Therefore, there will be no change in the requirement. Also, please see the response to Mr. Terry Cole's letter (No. 17) dated February 14, 1991, which will follow later.

(5). No. 15.: Response

See Mr. Terry Cole's letters (Nos. 2 and 3) dated January 8 and 9, 1991, respectively.

(6). No. 17.: Response

Based on an agreement with the request, the following will be changed:

From: An application for an operation permit must be submitted to the DER's Northeast District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

To: An application for an operation permit must be submitted to the DER's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

b. C-Line Brown Stock Washer System (BSWS): AC 45-190383

SPECIFIC CONDITIONS

(1)(a). No. 2.: Response

Since surrogate parameters are approved pursuant to F.A.C. Rule 17-2.700(3)(d), no additional language will be added. There was an agreement to delete the reference of the efficiency.

Therefore, the following will be changed:

From: The emissions from the C-Line brown stock washer system (BSWS), as defined in 40 CFR 60.281(e), shall be controlled with a wet scrubber system or equivalent, having a minimum removal efficiency of 95% for TRS.

To: The emissions from the C-Line brown stock washer system (BSWS), as defined in 40 CFR 60.281(e), shall be controlled with a wet scrubber system or equivalent.

(b). No. 8.: Response

Since surrogate parameters are approved pursuant to F.A.C. Rule 17-2.700(3)(d), no additional language will be added. Therefore, no change will be made.

(2). Nos. 3 and 4.: Response

Specific Conditions Nos. 3 and 4 will not be merged, because each condition is appropriate on its own. However, Specific Condition No. 3 will be changed to the following:

From: For PSD purposes, the total BSWS's (A, B and C-Lines) maximum production rate shall not exceed 1391 TPD ADP.

To: For PSD purposes, the total BSWS's (A, B and C-Lines) maximum production rate is 1391 TPD ADP.

(3). No. 5.: Response

The correct value is 0.70 TPY. Based on discussions with CCA representatives, the following will be changed:

From: Maximum TRS allowable emissions shall not exceed 0.16 lbs/hr, 0.70 TPY.

To: Pursuant to 40 CFR 60.283(a)(1)(v), the maximum TRS allowable emissions is 5 ppm by volume on a dry basis, corrected to the actual oxygen content of the untreated gas stream (0.16 lb/hr, 0.70 TPY).

(4). No. 14.b.: Response

See response to No. 1.a.(4).

(5). No. 15.: Response

See response to No. 1.a.(5).

(6). No. 17.: Response

See response to No. 1.a.(6).

c. Technical Evaluation and Preliminary Determination (TE&PD)

(1). Article II, 6th Paragraph: Response

The comment is recognized by the BAR. Since the TE&PD is not affected significantly, it will not be revised and reissued.

(2). Article III.A., Paragraph 1: Response

See response to No. 1.a.(3).

(3). Article III.B.2.: Response

Preconstruction monitoring for beryllium and sulfuric acid mist was not required.

(4). Article III.B.4., last paragraph: Response

Modeling was performed for beryllium and sulfuric acid mist and was shown to be less than acceptable ambient concentrations.

2. Mr. Terry Cole's letter dated January 8, 1991, and received January 9, 1991.

Response:

No response required.

3. Mr. Terry Cole's letter dated January 9, 1991, and received January 9, 1991.

Response:

No response required.

4. Mr. Steven R. Marks's letter with enclosure dated January 9, 1991, and received January 10, 1991.

Response:

No response required.

5. Mr. David A. Buff's submittal of JEA's revised PSD report (pages 5-1 and 6-2) to EPA Region IV dated May, 1980, and received January 24, 1991.

Response:

See response to No. 8, which will follow later.

6. Ms. Jewell A. Harper's letter dated January 24, 1991, and received January 25, 1991, via FAX.

Response:

See response to No. 8, which will follow later.

7. Mr. Tom Rogers' Interoffice Memorandum dated January 25, 1991.

Response:

See response to No. 8, which will follow.

8. Mr. David A. Buff's letter with attachment dated January 26, 1991, and received January 28, 1991.

Response:

The applicant submitted computer dispersion modeling using no half-life for SO<sub>2</sub> that showed four predicted violations of the 24-hour SO<sub>2</sub> Class I increment in the Okefenokee National Wilderness Area in Georgia. However, all of the predicted violations are caused by other sources. CCA's contribution to the predicted violations is less than 0.001 ug/m<sup>3</sup>. The applicant also



submitted modeling which showed that the use of a 12-hour half-life resulted in no predicted violations of any SO<sub>2</sub> PSD increment in the Class I areas. The use of the 12-hour half-life is consistent with the modeling submitted and approved in the permitting of the nearby St. Johns River Power Park in Jacksonville, Florida, as stated in letter No. 5. The modeling results submitted with letter No. 8 were based on concerns about the use of an SO<sub>2</sub> half-life expressed in letters Nos. 6, 7, 10, 11, 12, 15 and 16. These seven letters communicated the concerns of the U.S. EPA and the U.S. Department of the Interior (DOI).

9. Ms. Marcia L. Spink's letter dated April, 1980, and received January 28, 1991, via FAX.

Response:

See response to No. 17, which will follow later.

10. Ms. Jewell A Harper's letter with enclosure dated January 29, 1991, and received January 29, 1991, via FAX.

Response:

There were two main concerns expressed in this letter. For the comment on the SO<sub>2</sub> half-life in the Class I areas, refer to the response to letter No. 8. For the comment on the proposed raising of CCA's No. 5 Power Boiler's stack from 237 ft. to 257 ft., see the response to letter No. 17, which will follow later.

11. Mr. Wilbur N. Ladd, Jr.'s letter without enclosures dated January 31, 1991, and received January 31, 1991, via FAX.

Response:

See response to No. 8.

12. Ms. Jewell A. Harper's letter (hard copy) dated January 24, 1991, and received February 1, 1991.

Response:

See response to No. 8.

13. Mr. David A. Buff's letter with attachments dated February 4, 1991, and received February 4, 1991.

Response:

See response to No. 17, which will follow later.

14. Mr. Terry Cole's letter with attachment dated February 5, 1991, and received February 5, 1991.

Response:

See response to No. 17, which will follow later.

15. Mr. Wilbur N. Ladd, Jr.'s letter (hard copy) without enclosures dated January 31, 1991, and received February 7, 1991.

Response:

See response to No. 8.

16. Mr. Wilbur N. Ladd, Jr.'s letter with enclosures dated January 31, 1991, and received February 7, 1991, via FAX.

Response:

See response to No. 8.

17. Mr. Terry Cole's letter with attachment dated February 14, 1991, and received February 14, 1991.

Response:

The U.S. EPA, in letters Nos. 9 and 10, raised concerns over CCA's proposed raising of the No. 5 Power Boiler's stack from 227 ft. to 257 ft. above ground in order to resolve a modeled violation of the 24-hour SO<sub>2</sub> Florida Ambient Air Quality Standard. The applicant replied to these concerns in letters Nos. 13 and 14. Based on a conference call between representatives of the Department, EPA-Region IV, and DOI, on February 13, 1991, the following will be changed:

a. No. 8 BDS (AC 45-190382)

SPECIFIC CONDITION

No. 14.:

From: Prior to the start-up of the No. 8. BDS, the following conditions attributed to the existing No. 5 Power Boiler shall be satisfied:

a. The stack height shall be increased by 30 ft. from 227 ft. to 257 ft. above ground level;

b. A construction permit shall be acquired by submitting an application and the appropriate processing fee to the Department's Bureau of Air Regulation in order to establish a federally enforceable permit and conditions;

c. The No. 6 Fuel Oil sulfur content shall not exceed 2.5%, by weight; and,

d. The No. 6 Fuel Oil input rate shall be limited to a maximum of 92,000 gallons per 24-hour period (midnight to midnight).

To: Prior to the start-up of the No. 8 BDS, the following conditions shall be satisfied:

a. The No. 5 Power Boiler's stack height shall be raised or other appropriate measures taken to reduce SO<sub>2</sub> emissions from the No. 5 Power Boiler and/or other sources at the facility so as to correct the modeled ambient SO<sub>2</sub> violation due to the emissions from the facility. A demonstration in accordance with EPA and state rules shall be utilized to determine the appropriate stack height;

b. A construction permit for the No. 5 Power Boiler shall be acquired by submitting an application and the appropriate processing fee to the Department's Bureau of Air Regulation in order to establish a federally enforceable permit and conditions;

c. For the facility, the No. 6 Fuel Oil sulfur content shall not exceed 2.5%, by weight; and,

d. The No. 6 Fuel Oil input rate for the No. 5 Power Boiler shall be limited to a maximum of 92,000 gallons per 24-hour period (midnight to midnight).

b. C-Line BSWS (AC 45-190383)

SPECIFIC CONDITION

No. 14.:

From: Prior to the start-up of the C-Line BSWS, the following conditions attributed to the existing No. 5 Power Boiler shall be satisfied:

a. The stack height shall be increased by 30 ft. from 227 ft. to 257 ft. above ground level;

b. A construction permit shall be acquired by submitting an application and the appropriate processing fee to the Department's Bureau of Air Regulation in order to establish a federally enforceable permit and conditions;

c. The No. 6 Fuel Oil sulfur content shall not exceed 2.5%, by weight; and,

d. The No. 6 Fuel Oil input rate shall be limited to a maximum of 92,000 gallons per 24-hour period (midnight to midnight).

To: Prior to the start-up of the C-Line BSWS, the following conditions shall be satisfied:

a. The No. 5 Power Boiler's stack height shall be raised or other appropriate measures taken to reduce SO<sub>2</sub> emissions from the No. 5 Power Boiler and/or other sources at the facility so as to correct the modeled ambient SO<sub>2</sub> violation due to the emissions from the facility. A demonstration in accordance with EPA and state rules shall be utilized to determine the appropriate stack height;

b. A construction permit for the No. 5 Power Boiler shall be acquired by submitting an application and the appropriate processing fee to the Department's Bureau of Air Regulation in order to establish a federally enforceable permit and conditions;

c. For the facility, the No. 6 Fuel Oil sulfur content shall not exceed 2.5%, by weight; and,

d. The No. 6 Fuel Oil input rate for the No. 5 Power Boiler shall be limited to a maximum of 92,000 gallons per 24-hour period (midnight to midnight).

Attachments to be Incorporated:

26. Mr. Wayne Barlow's letter dated January 4, 1991, and received on January 4, 1991, at a meeting held at the BAR.

27. Mr. Terry Cole's letter dated January 8, 1991, and received January 9, 1991.

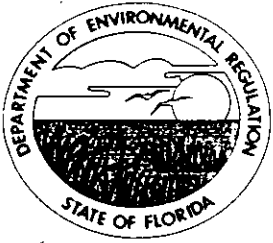
28. Mr. Terry Cole's letter dated January 9, 1991, and received January 9, 1991.

29. Mr. Steven R. Marks's letter with enclosure dated January 9, 1991, and received January 10, 1991.

30. Mr. David A. Buff's submittal of JEA's revised PSD report (pages 5-1 and 6-2) to EPA Region IV dated May, 1980, and received January 24, 1991.

31. Ms. Jewell A. Harper's letter dated January 24, 1991, and received January 25, 1991, via FAX.
32. Mr. Tom Roger's Interoffice Memorandum dated January 25, 1991.
33. Mr. David A. Buff's letter with attachment dated January 26, 1991, and received January 28, 1991.
34. Ms. Marcia L. Spink's letter dated April, 1980, and received January 28, 1991, via FAX.
35. Ms. Jewell A. Harper's letter with enclosure dated January 29, 1991, and received January 29, 1991, via FAX.
36. Mr. Wilbur N. Ladd, Jr.'s letter without enclosures dated January 31, 1991, and received January 31, 1991, via FAX.
37. Ms. Jewell A. Harper's letter (hard copy) dated January 24, 1991, and received February 1, 1991.
38. Mr. David A. Buff's letter with attachment dated February 4, 1991, and received February 4, 1991.
39. Mr. Terry Cole's letter with attachment dated February 5, 1991, and received February 5, 1991.
40. Mr. Wilbur N. Ladd, Jr.'s letter (hard copy) without enclosures dated January 31, 1991, and received February 7, 1991.
41. Mr. Wilbur N. Ladd, Jr.'s letter with enclosures dated January 31, 1991, and received February 7, 1991, via FAX.
42. Mr. Terry Cole's letter with attachmant dated February 14, 1991, and received February 14, 1991.

The final action of the Department will be to issue the construction permits, Nos. AC 45-190382 and -190383 and PSD-FL-165, as drafted, with the above changes incorporated.



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**  
Container Corporation of  
America  
North 8th Street  
Fernandina Beach, Florida  
32034

Permit Number: AC 45-190382  
PSD-FL-165  
Expiration Date: June 30, 1992  
County: Nassau  
Latitude/Longitude: 30°40'53"N  
81°27'26"W  
Project: Batch Digester System  
No. 8

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July 1, 1989 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction of a new batch digester system (BDS), No. 8, which will become a part of the total BDS at the permittee's existing facility. The No. 8 BDS is a new source performance standard source pursuant to 40 CFR 60.281(d). The No. 8 BDS will have a maximum capacity of 6000 ft<sup>3</sup>. The UTM coordinates are Zone 17, 456.2 km East and 3394.2 km North.

The Standard Classification Codes are:

o 3-07-001-01 Digester Relief and Blow Tank                      Tons ADUP

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

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received May 31, 1990.
2. Mr. C. H. Fancy's letter with Attachments dated June 28, 1990.
3. Mr. Wayne S. Barlow's letter received July 23, 1990.
4. Documents (2) received October 16, 1990, at a meeting held at the Department's Division of Air Resources Management conference room.
5. EPA documents (2) FAX'd to Mr. Roger Hagan on October 17, 1990:
  - a. Mr. James T. Wilburn's letter of August 15, 1983.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-190382  
PSD-FL-165  
Expiration Date: June 30, 1992

Attachments Continued:

- b. Ms. Jewell A. Harper's letter of April 4, 1990.
6. Mr. Wayne S. Barlow's letter with an attachment (waiver of the 90-day clock) received October 18, 1990.
7. Mr. Wayne S. Barlow's letter received October 19, 1990.
8. Mr. Mort Benjamin's Interoffice Memorandum received October 25, 1990.
9. Mr. R. L. Caleen's letter with enclosure (waiver of the 90-day clock) received October 31, 1990.
10. "Air Quality Impact Analysis" prepared by KBN Engineering and Sciences, Inc., and received November 5, 1990.
11. Mr. Wayne S. Barlow's letter received November 7, 1990.
12. Data sheet received November 8, 1990 (hand delivered).
13. Notice of Permit Denials signed November 13, 1990.
14. Mr. Wayne S. Barlow's letter with attachment dated December 3, 1990.
15. "Net Emissions Increase Analysis" prepared by KBN Engineering and Applied Sciences, Inc., and received on December 6, 1990 (no P.E. seal affixed to the document).
16. EPA documents (3) related to "debottlenecking and PSD" received via FAX from Mr. Greg Worley on December 6, 1990.
17. "Analysis of CCA Contributions to Predicted SO<sub>2</sub> Exceedances" received December 10, 1990 (no P.E. seal affixed to the document).
18. Mr. Roger Hagan's Interoffice Correspondence (Fuel Oil Consumption by the No. 4 Power Boiler) received December 12, 1990.
19. Mr. Terry Cole's letter with an enclosure (P.E. sealed document referred to in #14 above) received December 17 1990.
20. DARM/BAMA modeling output synopsis pages (2) dated December 17, 1990.
21. Mr. C. H. Fancy's letter with attachments dated December 18, 1990.
22. Technical Evaluation and Preliminary Determination dated December 19, 1990.
23. F.A.C. Chapter 17-2 (October, 1989).
24. F.A.C. Chapter 17-4 (October 17, 1990)
25. 40 CFR (July 1, 1989 version).
26. Mr. Wayne Barlow's letter dated January 4, 1991, and received on January 4, 1991, at a meeting held at the BAR.
27. Mr. Terry Cole's letter dated January 8, 1991, and received January 9, 1991.
28. Mr. Terry Cole's letter dated January 9, 1991, and received January 9, 1991.
29. Mr. Steven R. Marks's letter with enclosure dated January 9, 1991, and received January 10, 1991.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-190382  
PSD-FL-165  
Expiration Date: June 30, 1992

**GENERAL CONDITIONS:**

Attachments Continued:

30. Mr. David A. Buff's submittal of JEA's revised PSD report (pages 5-1 and 6-2) to EPA Region IV dated May, 1980, and received January 24, 1991.
31. Ms. Jewell A. Harper's letter dated January 24, 1991, and received January 25, 1991, via FAX.
32. Mr. Tom Roger's Interoffice Memorandum dated January 25, 1991.
33. Mr. David A. Buff's letter with attachment dated January 26, 1991, and received January 28, 1991.
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42. Mr. Terry Cole's letter with attachmant dated February 14, 1991, and received February 14, 1991.

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-190382  
PSD-FL-165  
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

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

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



PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-190382  
PSD-FL-165  
Expiration Date: June 30, 1992

**GENERAL CONDITIONS:**

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

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

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

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

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

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

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

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-190382  
PSD-FL-165  
Expiration Date: June 30, 1992

**GENERAL CONDITIONS:**

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes Compliance with New Source Performance Standards (NSPS).

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

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

c. Records of monitoring information shall include:

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

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

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-190382  
PSD-FL-165  
Expiration Date: June 30, 1992

**SPECIFIC CONDITIONS:**

1. The source is permitted to operate continuously (i.e., 8760 hrs/year).
2. 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).
3. Actual mass emissions from the No. 8 BDS shall be determined prior to and after any future changes that are not specifically authorized by this permit in accordance with 40 CFR 60.283(a)(1).
4. For testing purposes and NSPS applicability purposes, the maximum production rate of the total batch digester system is 101 tons of air dried unbleached pulp (ADUP)/hr. Annual tests for compliance shall be performed with the control device (incinerator) operating properly and with the total batch digester system operating as near the maximum production rate as possible, but in no case shall the operating rate of the total batch digester system be less than 85% of the maximum production rate when testing. For PSD purposes, the maximum production rate for the total batch digester system is 1391 tons of ADUP/day and based on a nominal utilization rate of 2,690 TPD of wood chips (dry) and 5,620 TPD of cooking liquor (dry).
5. All TRS gases burned in the TRS incinerator shall be subjected to a minimum temperature of at least 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).
6. All excess emissions from the total batch digester system, the noncondensable gas handling (NCG) system, and the TRS incinerator shall be subject to the applicable requirements of F.A.C. Rules 17-2.240, 17-2.250, 17-2.600(4)(c)1.c., and 17-4.130. The required contingency plan shall be submitted to the DER's Northeast District office.
7. Monitoring of emissions and operations shall be in accordance with 40 CFR 60.284 and F.A.C. Rule 17-2.710(4).
8. Compliance test methods shall be in accordance with 40 CFR 60.285. Any initial compliance test shall be conducted in accordance with 40 CFR 60.8.
9. The No. 8 BDS is subject to the provisions of F.A.C. Rule 17-2.660, Standards of Performance for New Stationary Sources.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-190382  
PSD-FL-165  
Expiration Date: June 30, 1992

**SPECIFIC CONDITIONS:**

10. The No. 8 BDS system is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July 1, 1989 version).

11. Objectionable odors shall not be allowed off plant property pursuant to F.A.C. Rule 17-2.620(2).

12. The DER's Northeast District office shall be notified in writing at least 15 days prior to compliance testing in accordance with F.A.C. Rule 17-2.700(2)(a). Test reports shall be submitted to the DER's Northeast District office in accordance with F.A.C. Rule 17-2.700(2).

13. Based on the SO<sub>2</sub> pre- and post-test results (actuals) established from the specific condition requirements contained in Construction Permits Nos. AC 45-141871, -141872, -141873 and -141877, a net SO<sub>2</sub> emission change shall be established for the TRS gas incinerator to rule out or require further emissions review pursuant to F.A.C. Rule 17-2.500, PSD, and to assess the appropriate processing fee(s) pursuant to F.A.C. Rule 17-4.050 for the TRS noncondensable gas handling system's associated sources.

14. Prior to the start-up of the No. 8 BDS, the following conditions shall be satisfied:

- a. The No. 5 Power Boiler's stack height shall be raised or other appropriate measures taken to reduce SO<sub>2</sub> emissions from the No. 5 Power Boiler and/or other sources at the facility so as to correct the modeled ambient SO<sub>2</sub> violation due to the emissions from the facility. A demonstration in accordance with EPA and state rules shall be utilized to determine the appropriate stack height;
- b. A construction permit for the No. 5 Power Boiler shall be acquired by submitting an application and the appropriate processing fee to the Department's Bureau of Air Regulation in order to establish a federally enforceable permit and conditions;
- c. For the facility, the No. 6 Fuel Oil sulfur content shall not exceed 2.5%, by weight; and,
- d. The No. 6 Fuel Oil input rate for the No. 5 Power Boiler shall be limited to a maximum of 92,400 gallons per 24-hour period (midnight to midnight).

15. Prior to the start-up of the No. 8 BDS, permittee shall surrender the permit for the No. 4 Power Boiler.

16. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the DER's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-190382  
PSD-FL-165  
Expiration Date: June 30, 1992

SPECIFIC CONDITIONS:

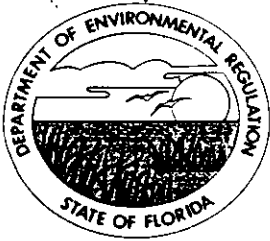
17. An application for an operation permit must be submitted to the DER's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.210 and .220).

Issued this 20<sup>th</sup> day  
of February, 1991

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



Carol M. Browner, Secretary



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**  
Container Corporation of  
America  
North 8th Street  
Fernandina Beach, Florida  
32034

Permit Number: AC 45-190383  
PSD-FL-165  
Expiration Date: June 30, 1992  
County: Nassau  
Latitude/Longitude: 30°40'53"N  
81°27'26"W  
Project: Brown Stock Washer  
System (C-Line)

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July 1, 1989 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction of a new C-Line brown stock washer system (BSWS), which will become a part of the total BSWS (A, B and C-Lines) at the permittee's existing facility. The C-Line BSWS is a new source performance standard source pursuant to 40 CFR 60.281(e). The C-Line BSWS will have a maximum product rate of 51,000 lbs/hr pulp (bone dry). The UTM coordinates are Zone 17, 456.2 km East and 3394.2 km North.

The Standard Classification Codes are:

o 3-07-001-00 Brown Stock Washer System Tons ADUP

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

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received May 31, 1990.
2. Mr. C. H. Fancy's letter with Attachments dated June 28, 1990.
3. Mr. Wayne S. Barlow's letter received July 23, 1990.
4. Documents (2) received October 16, 1990, at a meeting held at the Department's Division of Air Resources Management conference room.
5. EPA documents (2) FAX'd to Mr. Roger Hagan on October 17, 1990:
  - a. Mr. James T. Wilburn's letter of August 15, 1983.

PERMITTEE:  
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Attachments Continued:

- b. Ms. Jewell A. Harper's letter of April 4, 1990.
6. Mr. Wayne S. Barlow's letter with an attachment (waiver of the 90-day clock) received October 18, 1990.
7. Mr. Wayne S. Barlow's letter received October 19, 1990.
8. Mr. Mort Benjamin's Interoffice Memorandum received October 25, 1990.
9. Mr. R. L. Caleen's letter with enclosure (waiver of the 90-day clock) received October 31, 1990.
10. "Air Quality Impact Analysis" prepared by KBN Engineering and Sciences, Inc., and received November 5, 1990.
11. Mr. Wayne S. Barlow's letter received November 7, 1990.
12. Data sheet received November 8, 1990 (hand delivered).
13. Notice of Permit Denials signed November 13, 1990.
14. Mr. Wayne S. Barlow's letter with attachment dated December 3, 1990.
15. "Net Emissions Increase Analysis" prepared by KBN Engineering and Applied Sciences, Inc., and received on December 6, 1990 (no P.E. seal affixed to the document).
16. EPA documents (3) related to "debottlenecking and PSD" received via FAX from Mr. Greg Worley on December 6, 1990.
17. "Analysis of CCA Contributions to Predicted SO<sub>2</sub> Exceedances" received December 10, 1990 (no P.E. seal affixed to the document).
18. Mr. Roger Hagan's Interoffice Correspondence (Fuel Oil Consumption by the No. 4 Power Boiler) received December 12, 1990.
19. Mr. Terry Cole's letter with an enclosure (P.E. sealed document referred to in #14 above) received December 17, 1990.
20. DARM/BAMA modeling output synopsis pages (2).
21. Mr. C. H. Fancy's letter with attachments dated December 18, 1990.
22. Technical Evaluation and Preliminary Determination dated December 19, 1990.
23. F.A.C. Chapter 17-2 (October, 1989).
24. F.A.C. Chapter 17-4 (October 17, 1990)
25. 40 CFR (July 1, 1989 version).
26. Mr. Wayne Barlow's letter dated January 4, 1991, and received January 4, 1991, at a meeting held at the BAR.
27. Mr. Terry Cole's letter dated January 8, 1991, and received January 9, 1991.
28. Mr. Terry Cole's letter dated January 9, 1991, and received January 9, 1991.
29. Mr. Steven R. Marks's letter with enclosure dated January 9, 1991, and received January 10, 1991.

PERMITTEE:  
Container Corporation of  
America

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Expiration Date: June 30, 1992

**GENERAL CONDITIONS:**

Attachments Continued:

30. Mr. David A. Buff's submittal of JEA's revised PSD report (pages 5-1 and 6-2) to EPA Region IV dated May, 1980, and received January 24, 1991.
31. Ms. Jewell A. Harper's letter dated January 24, 1991, and received January 25, 1991, via FAX.
32. Mr. Tom Rogers Interoffice Memorandum dated January 25, 1991.
33. Mr. David A. Buff's letter with attachment dated January 26, 1991, and received January 28, 1991.
34. Ms. Marcia L. Spink's letter dated April, 1980, and received January 28, 1991, via FAX.
35. Ms. Jewell A. Harper's letter with enclosure dated January 29, 1991, and received January 29, 1991, via FAX.
36. Mr. Wilbur N. Ladd, Jr.'s letter without enclosures dated January 31, 1991, and received January 31, 1991, via FAX.
37. Ms. Jewell A. Harper's letter (hard copy) dated January 24, 1991, and received February 1, 1991.
38. Mr. David A. Buff's letter with attachment dated February 4, 1991, and received February 4, 1991.
39. Mr. Terry Cole's letter with attachment dated February 5, 1991, and received February 5, 1991.
40. Mr. Wilbur N. Ladd, Jr.'s letter (hard copy) without enclosures dated January 31, 1991, and received February 7, 1991.
41. Mr. Wilbur N. Ladd, Jr.'s letter with enclosures dated January 31, 1991, and received February 7, 1991, via FAX.
42. Mr. Terry Cole's letter with attachment dated February 14, 1991, and received February 14, 1991.

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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



PERMITTEE:  
Container Corporation of  
America

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GENERAL CONDITIONS:

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

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

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

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-190383  
PSD-FL-165  
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**GENERAL CONDITIONS:**

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

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

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

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

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

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

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

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-190383  
PSD-FL-165  
Expiration Date: June 30, 1992

**GENERAL CONDITIONS:**

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes Compliance with New Source Performance Standards (NSPS).

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
  - the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the dates analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

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

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-190383  
PSD-FL-165  
Expiration Date: June 30, 1992

SPECIFIC CONDITIONS:

1. The source is permitted to operate continuously (i.e., 8760 hrs/year).
2. The emissions from the C-Line brown stock washer system (BSWS), as defined in 40 CFR 60.281(e), shall be controlled with a wet scrubber system or equivalent.
3. For PSD purposes, the total BSWS's (A, B and C-Lines) maximum production rate is 1391 TPD ADP.
4. The maximum process input rate to the C-Line BSWS shall not exceed 51,000 lbs/hr pulp, bone dry, plus 76,739 lbs/hr black liquor solids (BLS), for a total of 127,739 lbs/hr process input rate. The maximum product weight is 51,000 lbs/hr pulp, bone dry (54,570 lbs/hr pulp, air dried (9.3 percent moisture)).
5. Pursuant to 40 CFR 60.283(a)(1)(v), the maximum TRS allowable emissions is 5 ppm by volume on a dry basis, corrected to the actual oxygen content of the untreated gas stream (0.16 lb/hr, 0.70 TPY).
6. Compliance testing shall be conducted while the C-Line BSWS is operating at 90-100% of the maximum process input rate.
7. The C-Line BSWS shall be subject to the applicable requirements of F.A.C. Rules 17-2.240, 17-2.250, 17-2.600(4)(c)1.c., and 17-4.130. The required contingency plan shall be submitted to the DER's Northeast District office.
8. Monitoring of emissions and operations shall be in accordance with 40 CFR 60.284 and F.A.C. Rule 17-2.710(4).
9. Compliance test methods shall be in accordance with 40 CFR 60.285. The initial compliance test shall be conducted in accordance with 40 CFR 60.8.
10. The C-Line BSWS is subject to the provisions of F.A.C. Rule 17-2.660, Standards of Performance for New Stationary Sources.
11. The C-Line BSWS is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July 1, 1989 version).
12. Objectionable odors shall not be allowed off plant property pursuant to F.A.C. Rule 17-2.620(2).
13. The DER's Northeast District office shall be notified in writing at least 15 days prior to compliance testing in accordance with F.A.C. Rule 17-2.700(2)(a). Test reports shall be submitted to the DER's Northeast District office in accordance with F.A.C. Rule 17-2.700(7).

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-190383  
PSD-FL-165  
Expiration Date: June 30, 1992

**SPECIFIC CONDITIONS:**

14. Prior to the start-up of the C-Line BSWS, the following conditions shall be satisfied:

- a. The No. 5 Power Boiler's stack height shall be raised or other appropriate measures taken to reduce SO<sub>2</sub> emissions from the No. 5 Power Boiler and/or other sources at the facility so as to correct the modeled ambient SO<sub>2</sub> violation due to the emissions from the facility. A demonstration in accordance with EPA and state rules shall be utilized to determine the appropriate stack height;
- b. A construction permit for the No. 5 Power Boiler shall be acquired by submitting an application and the appropriate processing fee to the Department's Bureau of Air Regulation in order to establish a federally enforceable permit and conditions;
- c. For the facility, the No. 6 Fuel Oil sulfur content shall not exceed 2.5%, by weight; and,
- d. The No. 6 Fuel Oil input rate for the No. 5 Power Boiler shall be limited to a maximum of 92,400 gallons per 24-hour period (midnight to midnight).

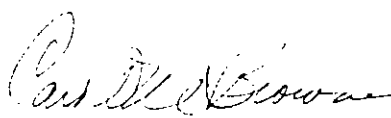
15. Prior to the start-up of the C-Line BSWS, permittee shall surrender the permit for the No. 4 Power Boiler.

16. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the DER's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

17. An application for an operation permit must be submitted to the DER's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.210 and .220).

Issued this 20 day  
of February, 1991

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
Carol M. Browner, Secretary

Brock Mitchell

LAW OFFICES  
OERTEL, HOFFMAN, FERNANDEZ & COLE  
A PROFESSIONAL ASSOCIATION

From:  
Terry Cole

2/14/91 RECEIVED

Larry / Bruce

FEB 11 1991

DEK DAY

attached is a revised condition  
that I drafted to try to meet the  
Secretary's comments on the CCA  
permits for your consideration.

Thanks for being available by  
phone for the meeting with EPA

Terry

14. Prior to the start-up of the No. 8 BDS, the following conditions attributed to the existing No. 5 Power Boiler shall be satisfied:

- a. The stack height shall be raised or other appropriate measures taken in conjunction with the fuel oil sulfur content reduction so as to correct the modeled ambient SO<sub>2</sub> exceedance due to the emissions from the No. 5 power boiler stack. A demonstration in accordance with EPA and state rules shall be utilized to determine the appropriate stack height;
- b. A construction permit shall be acquired by submitting an application and the appropriate processing fee to the Department's Bureau of Air Regulation in order to establish a federally enforceable permit and conditions;
- c. The No. 6 Fuel Oil sulfur content shall not exceed 2.5%, by weight; and,
- d. The No. 6 Fuel Oil input rate shall be limited to a maximum of 92,400 gallons per 24-hour period (midnight to midnight).



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: Steve Smallwood *[Signature]*  
DATE: February 19, 1991  
SUBJ: Approval of Construction Permits AC 45-190382  
AC 45-190383  
PSD-FL-165  
Container Corporation of America

Attached for your approval and signature are construction permits prepared by the Bureau of Air Regulation for the above mentioned corporation to construct a batch digester system (No. 8) and a brown stack washer system (C-Line) at their facility located in Fernandina Beach, Nassau County, Florida. Comments and additional information were received during the public notice period.

Day 90, after which the permits will be issued by default, is April 11, 1991.

I recommend your approval and signature.

CF/BM/rbm

Attachments