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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)

January 2, 1991

HAND DELIVERY

RECEIVED
JAN 2 1991
DER-BAQ

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

Re: **Container Corporation of America**
Permit Nos.: AC45-190382 and AC45-190383 - PSD-FL-165

Dear Mr. Fancy:

Attached is the original Proof of Publication from the
Fernandina Beach News-Leader which ran on Wednesday, December 26,
1990 for your files.

Sincerely,

Terry Cole
Terry Cole

TC:nhg

Attachment

cc: B. Mitchell
G. Warner, EPA
G. Kutyma, DE Dist.
C. Klover, NPS
R. Colborn, Jr., GA EPO
C. Halladay

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Container Corporation of America, North 8th Street, Fernandina Beach, Florida 32034 to construct/install one new batch digester system (No. 8) and a new brown stock washer system (C-Line). Even though the proposed new sources are not subject to new source review pursuant to PSD, the resultant potential pollutant emissions from other affected facility sources are greater than significant and subject to PSD evaluation for increment consumption and ambient air quality standards. The Class I particulate matter PSD increment consumed is 0.1 vs. 10 allowable 24-hour average and 0 vs. 5 allowable annual average, in micrograms per cubic meter. The Class I sulfur dioxide PSD increment consumed is 8.4 vs. 25 allowable 3-hour average, 1.2 vs. 5 allowable 24-hour average and 0 vs. 2 allowable annual average, in micrograms per cubic meter. The Class I nitrogen dioxide PSD increment consumed is 0.04 vs. 2.5 allowable annual average, in micrograms per cubic meter. The Class II particulate matter PSD increment consumed is 22 vs. 37 allowable 24-hour average and 0.3 vs. 19 allowable annual average, in micrograms per cubic meter. The Class II sulfur dioxide PSD increment consumed is 148 vs. 512 allowable 3-hour average, 24 vs. 91 allowable 24-hour average and 0 vs. 20 allowable annual average, in micrograms per cubic meter. The Class II nitrogen dioxide PSD increment consumed is 0 vs. 25 allowable annual average in micrograms per cubic meter. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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. 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, within fourteen (14) days of publication of this notice. 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, Florida Statutes.

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 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 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 of General Counsel of 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, Florida Statutes, 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.

The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

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

Department of Environmental Regulation
Northeast District
7825 Baymeadows Way, Suite 2008
Jacksonville, Florida 32256-7577

Any person may send written comments on the proposed action to Mr. C. H. Fancy at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination. Furthermore, a public hearing can be requested by any person. Such requests must be submitted within 30 days of this notice.

If 12-26-90
3410

News-Leader

511 Ash Street/P.O. Box 766 (904) 261-3696
Fernandina Beach, Florida 32034

Published Weekly

FERNANDINA BEACH, NASSAU COUNTY, FLORIDA

STATE OF FLORIDA
COUNTY OF NASSAU:

Before the undersigned authority personally appeared Michael Love, Editor who on oath says that he is Business Manager of The Fernandina Beach News-Leader, a weekly newspaper published at Fernandina Beach in Nassau County, Florida: that the attached copy of advertisement, being a Legal Notice in the matter of

STATE OF FLORIDA DER NOTICE OF INTENT TO ISSUE Container Copr.

published in said newspaper in the issues of 12-26, 1990
Ref. # 3410

Affiant further says that the said Fernandina Beach News-Leader is a newspaper published at Fernandina Beach in said Nassau County, Florida and that the said newspaper has heretofore been continuously published in said Nassau County, Florida, each week and has been entered as second class mail matter at the post office in Fernandina Beach in said County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me

this 27th day of DECEMBER, A.D. 1990.

Michael Love

Robert P. [Signature]
(SEAL) Notary Public

NOTARY PUBLIC, STATE OF FLORIDA
My commission expires April 28, 1992

P 256 395 056

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to	
Mr. Wayne Barlow, CCA	
Street and No	
North 8th Street	
P.O. State and ZIP Code	
Fernandina Beach, FL 32034	
Postage	\$
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	
Mailed: 12-20-90	
Permit: AC 45-190382	
AC 45-190383	
PSD-FL-165	

U.S.G.P.O. 1989-234-555
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. and General Manager
Container Corporation of America
North 8th Street
Fernandina Beach, FL 32034

4. Article Number
P 256 395 056

Type of Service:
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
X

6. Signature - Agent
X

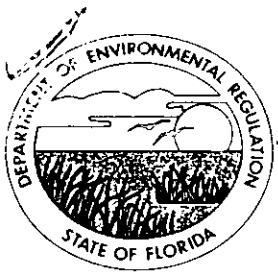
7. Date of Delivery

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

PS Form 3811, Apr. 1989

U.S. J.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT



File C. 101

Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

December 20, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

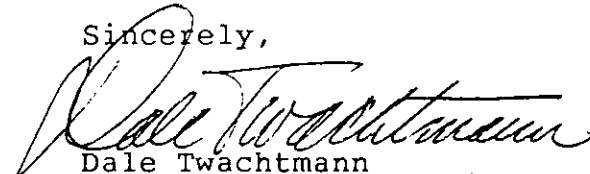
Mr. Wayne Barlow, V.P. and General Manager
Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

Dear Mr. Barlow:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permits for Container Corporation of America to construct/install one new batch digester system (No. 8) and a new brown stock washer system (C-Line). Even though the proposed new sources are not subject to new source review pursuant to PSD, the resultant potential pollutant emissions from other affected facility sources are greater than significant and subject to PSD evaluation for increment consumption and ambient air quality standards.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,



Dale Twachtmann
Secretary

DT/kt

Attachments

c: A. Kutyna, NE District
J. Harper, EPA
C. Shaver, NPS
R. Collom, Jr., GaEPD
D. Buff, P.E., KBN
T. Cole, OHF&C

B. Mitchell

C. Holladay

Reading file

B. Williams, JSC - picked up a copy personally - 12/20/90

} 12/20/90 RJC

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permits by:

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

DER File No. AC 45-190382
AC 45-190383
PSD-FL-165

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue air construction permits (copies attached) for the proposed project as detailed in the applications specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Container Corporation of America, applied on May 31, 1990, to the Department of Environmental Regulation for permits to construct/install one new batch digester system (No. 8) and a new brown stock washer system (C-Line). Even though the proposed new sources are not subject to new source review pursuant to PSD, the resultant potential pollutant emissions from other affected facility sources are greater than significant and subject to PSD evaluation for increment consumption and ambient air quality standards. The proposed project will occur at the applicant's existing facility located in Fernandina Beach, Nassau County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits are required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permits. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

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. 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 permit 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, Florida Statutes.

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 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

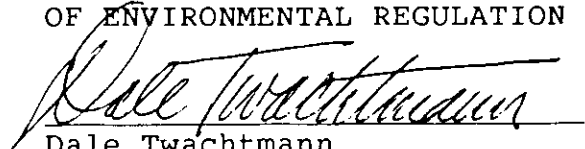
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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 applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such

person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Dale Twachtmann
Secretary

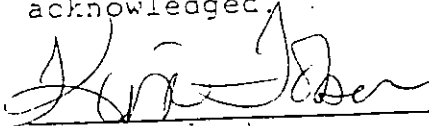
Copies furnished to:

- A. Kutyna, NE District
- 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 INTENT TO ISSUE and all copies were mailed before the close of business on 12-30-90.

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.


Clerk

12-30-90
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Container Corporation of America, North 8th Street, Fernandina Beach, Florida 32034 to construct/install one new batch digester system (No. 8) and a new brown stock washer system (C-Line). Even though the proposed new sources are not subject to new source review pursuant to PSD, the resultant potential pollutant emissions from other affected facility sources are greater than significant and subject to PSD evaluation for increment consumption and ambient air quality standards. The Class I particulate matter PSD increment consumed is 0.1 vs. 10 allowable 24-hour average and 0 vs. 5 allowable annual average, in micrograms per cubic meter. The Class I sulfur dioxide PSD increment consumed is 8.4 vs. 25 allowable 3-hour average, 1.2 vs. 5 allowable 24-hour average and 0 vs. 2 allowable annual average, in micrograms per cubic meter. The Class I nitrogen dioxide PSD increment consumed is 0.04 vs. 2.5 allowable annual average in micrograms per cubic meter. The Class II particulate matter PSD increment consumed is 22 vs. 37 allowable 24-hour average and 0.3 vs. 19 allowable annual average, in micrograms per cubic meter. The Class II sulfur dioxide PSD increment consumed is 148 vs. 512 allowable 3-hour average, 24 vs. 91 allowable 24-hour average and 0 vs. 20 allowable average, in micrograms per cubic meter. The Class II nitrogen dioxide PSD increment consumed is 0 vs. 25 allowable annual average in micrograms per cubic meter. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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(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.

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The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Northeast District
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7577

Any person may send written comments on the proposed action to Mr. C. H. Fancy at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination. Furthermore, a public hearing can be requested by any person. Such requests must be submitted within 30 days of this notice.

Technical Evaluation
and
Preliminary Determination

Container Corporation of America
Nassau County
Fernandina Beach, Florida

Construction Permits Numbers
AC 45-190382
AC 45-190383
PSD-FL-165

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

December 20, 1990

I. Application

A. Applicant

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

B. Request

The applicant intends to construct/install one new batch digester system (No. 8) and a new brown stock washer system (C-Line). Even though the proposed new sources are not subject to new source review pursuant to PSD, the resultant potential pollutant emissions from other affected facility sources are greater than significant and subject to PSD evaluation for increment consumption and ambient air quality standards. The pollutant emissions from these sources are total reduced sulfur (TRS). The project will occur at the applicant's existing facility located in Nassau County, Florida.

The UTM coordinates are Zone 17, 456.2 km East and 3394.2 km North.

C. Process and Controls

1. Batch Digester System

The new batch digester system (No. 8) will have a maximum capacity of 6000 ft³. The new batch digester system will become a part of a total batch digester system containing eight (8) batch digesters, a turpentine condenser, and two (2) blow tanks (Nos. A & B). For PSD purposes, the total system has a maximum 24-hr permitted processing capacity of 1391 tons per day air dried unbleached pulp (TPD ADUP) at 7% water moisture.

The TRS emissions from the entire batch digester system will be controlled by a noncondensable gas (NCG) system that collects and delivers the TRS emissions to the No. 4 lime kiln. The TRS emissions will be oxidized to SO₂ emissions by the No. 4 lime kiln.

2. Brown Stock Washer (C-Line)

Pulp and black liquor from the "B" blow tank of the existing batch digester system will pass through existing, relocated fibrilizers and refiners, and then to a new surge tank. From the surge tank, the pulp will enter a new screen, then a new rotary drum vacuum washer, and finally a new diffusion washer. The washers will utilize fresh water for washing. The washed pulp will then be sent to high density storage.

Liquid filtrate from the new rotary drum vacuum washer will be sent to a new filtrate tank (C1), while liquid filtrate from the new diffusion washer will be sent to a second new filtrate tank (C2). Filtrate from the C2 filtrate tank will be used as washwater for the rotary drum vacuum washer. Filtrate from the C1 filtrate tank will be sent to the multiple effect evaporators.

The rotary drum vacuum washer will have a hood which vents off-gases from the washer. The two filtrate tanks will each have vents. These vents are relatively high volume gas streams with low concentrations of total reduced sulfur (TRS). TRS emissions from these sources will be controlled by a wet scrubber system or equivalent. The scrubber system will be designed to reduce TRS emissions to 5 ppmvd, corrected to the actual oxygen content of the untreated gas stream.

D. Source Classification Codes (SCC) are:

- o 3-07-001-01, Digester Relief and Blow Tank Tons ADUP
- o 3-07-001-99, Brown Stock Washer Tons ADUP

E. Source Industrial Code (SIC) is:

- o 2621 Paper Mill

II. The proposed project is subject to preconstruction review in accordance with Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1989 version).

The application package was deemed complete on December 18, 1990.

Nassau County is designated attainment for all of the criteria pollutants pursuant to F.A.C. Chapter 17-2, Part IV, Area Designation and Attainment Dates.

The existing mill is a major emitting facility for the pollutants TRS and SO₂ in accordance with F.A.C. Rule 17-2.100(115).

The new No. 8 batch digester system (BDS) has the potential to emit TRS emissions and, after incineration, SO₂ emissions. The new C-Line brown stock washer system (BSWS) has the potential to emit TRS emissions.

TRS emissions from the new No. 8 BDS will be captured and transported to the No. 4 lime kiln for incineration purposes, which will result in some potential SO₂ emissions. However, the lime mud scrubbing of the SO₂ emissions will result in an increase in mud sulfidity and when burned in the recovery boiler as part of the black liquor, will result in emissions of SO₂.

Further, the sources involved with the chemical recovery process after the cooking liquor is expelled from just the proposed new No. 8 BDS will have significant increases in potential pollutant emissions subjecting the facility's proposed modification to PSD review for increment consumption and ambient air quality standards in accordance to U.S. EPA's letter of July 28, 1983 (see Attachment No. 15).

Even though the modification's resultant potential pollutant emissions are subject to PSD review for increment and standards, the proposed new No. 8 BDS's and C-L BSWS's potential pollutant emissions are less than significant and are, therefore, not subject to new source review for PSD (Prevention of Significant Deterioration) pursuant to F.A.C. Rule 17-2.500(5). The sources will be evaluated in accordance to F.A.C. Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Requirements.

The projected potential TRS emissions associated with the new BSWS (C-Line) is 0.70 TPY (0.16 lbs/hr). This assumes an acceptable TRS control system having a minimum removal efficiency of 95%.

The new BDS and BSWS, as defined in 40 CFR 60.281(d) and (e), respectively, are subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4, and 40 CFR 60 (July, 1989 version). Pursuant to F.A.C. Rule 17-2.660, the new BDS and BSWS are subject to the Standards of Performance for Kraft Pulp Mills, 40 CFR 60, Subpart BB. The new BDS and BSWS are subject to the applicable provisions of 40 CFR 60.280, 40 CFR 60.281, 40 CFR 60.283, 40 CFR 60.284, and 40 CFR 60.285.

The applicant elected to incinerate the TRS emissions from the new BDS in the new No. 4 Lime Kiln via the TRS NCG handling system pursuant to 40 CFR 60.283(a)(1)(iii). The No. 4 Lime Kiln is permitted in the construction permit, No. AC 45-141877.

Monitoring of emissions and operations shall be in accordance with 40 CFR 60.284 and F.A.C. Rule 17-2.710(4).

Compliance test methods and procedures shall be in accordance with 40 CFR 60.285. Any initial compliance test shall be conducted in accordance with 40 CFR 60.8.

The new BDS and its associated control system are subject to the provisions of F.A.C. Rule 17-2.600(4)(c)l.c., which includes the establishment of a contingency plan.

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

The new BDS and BSWS are subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operations-Problems.

III. Summary of Emission and Air Quality Analysis

A. Emission Limitations

For the proposed new BDS No. 8, the TRS emissions will be captured and transported to the new NSPS No. 4 lime kiln for incineration purposes, resulting in SO₂ emissions. Consequently, an SO₂ PSD allowable limit will be established for the No. 4 lime kiln (AC 45-141877) by using the SO₂ post-test results (actuals), which is a specific condition requirement in Construction Permits Nos. AC 45-141871, -141872, -141873 and -141877. Therefore, the No. 4 lime kiln's construction permit will be amended to establish a PSD allowable limit for SO₂ when the Department receives the SO₂ post-test results. Also, the TRS emissions from the proposed new No. 8 BDS shall be in accordance with the provisions of 40 CFR 60.283(a)(1).

For the proposed new BSWS (C-Line), the TRS emissions shall be in accordance with the provisions of 40 CFR 60.283(a)(1). Since the applicant will be controlling the TRS emissions by a means other than incineration (i.e., wet scrubber system or equivalent, having a minimum removal efficiency of 95%), the source is subject to the provisions of 40 CFR 60.283(a)(1)(v), which establishes the following allowable limitation:

	<u>Allowable Limitation</u>
C-Line BSWS	5 ppmvd, corrected to the actual oxygen content of the untreated gas stream (0.16 lbs/hr, 0.70 TPY)

- Note:
- o Based on 8760 hrs/yr operation.
 - o Based on no changes in permitted capacities (i.e., NSPS, testing & PSD) for the mill's current systems/sources.

The emission limiting standards/limitations are consistent with the applicable requirements of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July 1, 1989 version).

B. Air Quality Analysis

1. Introduction

The proposed modification and resultant pollutant emissions will result in emissions increases which are projected to be greater than the PSD significant emission rates for the following pollutants: CO, NO_x, SO₂, PM, PM₁₀, Be, and H₂SO₄ mist. Therefore, the project is subject to the PSD review requirements contained in F.A.C. Rule 17-2.500 for these pollutants. Part of these requirements is an air quality impact analysis for these pollutants, which includes:

- An analysis of existing air quality;
- A PSD increment analysis (for SO₂, PM, PM₁₀, and NO_x);
- An ambient Air Quality Standards analysis (AAQS);
- An analysis of impacts on soils, vegetation, visibility and growth-related air quality impacts; and
- A Good Engineering Practice (GEP) stack height determination.

The analysis of existing air quality generally relies on preconstruction monitoring data collected in accordance with EPA-approved methods. The PSD increment and AAQS analyses are based on air quality dispersion modeling completed in accordance with EPA guidelines.

Based on the analyses submitted by the applicant, the Department has reasonable assurance that the proposed modification as described in this report and subject to the conditions of approval proposed herein, will not cause or contribute to a violation of any PSD increment or ambient air quality standard. A brief description of the modeling methods used and results of the required analyses follow. A more complete description is contained in the permit application on file.

2. Analysis of the Existing Air Quality

Preconstruction ambient air quality monitoring may be required for pollutants subject to PSD review. In general, one year of quality assured data using an EPA reference monitor, or equivalent, must be submitted. For the pollutants, PM₁₀, SO₂, and NO_x data from existing FDER monitors in the vicinity of CCA were used to determine the existing air quality and to give background values to be added to modeled values for these pollutants. Data from the 1989 were used. An exemption to the monitoring requirement can be obtained if the maximum air quality impact resulting from the projected emissions increase, as determined through air quality modeling, is less than a pollutant-specific de minimus concentration. The predicted maximum concentration increase for CO was less than this concentration; therefore no preconstruction monitoring is required for CO. There are no monitoring de minimus concentrations for H₂SO₄ mist.

3. Modeling Method

The EPA-approved Industrial Source Complex Short-Term (ISCST) dispersion model was used by the applicant to predict the impact of the proposed project on the surrounding ambient air. All recommended EPA default options were used. Direction-specific downwash parameters were used because the stacks were less than the good engineering practice (GEP) stack height. Five years of sequential hourly surface and mixing depth data from the Jacksonville, Florida/Waycross, Georgia National Weather Service

(NWS) stations collected during 1983 through 1987 were used in the model. Since five years of data were used, the highest-second-high short-term predicted concentrations are compared with the appropriate ambient air quality standards or PSD increments. For the annual averages, the highest predicted yearly average was compared with the standards.

4. Modeling Results

The applicant modeled CCA emissions and emissions from ITT Rayonier and Gilman Paper Company, two major sources within 15km of CCA. Contributions from other sources to modeled impacts near CCA were established by using the background values obtained from ambient monitoring data near CCA.

Dispersion modeling was performed for PM, PM₁₀, SO₂, NO_x, and CO. Screening modeling was performed using receptors off property and located along 36 radials spaced at 10 degree increments at distances of .4, .7, 1.0, 1.3 and 1.7 km from the grid center (CCA's power boiler No. 7).

An additional 36 receptors were placed along the 10° degree radials at the extent of CCA's property boundary. For the PM increment screening analysis, all SO₂ analyses, and the CO ambient air quality analysis an extra ring placed at 2.1 km was used. In addition for the SO₂, AAQS analysis, a separate grid located to the southwest of ITT Rayonier, in directions that would align CCA and ITT (195° to 240°) and extending out to 4.6 km was used.

When refined modeling was performed, receptors were placed along nine radials spaced at 2 degree intervals and centered on the receptor of maximum impact determined in the screening analysis. Spacing of receptors along each radial was no more than 100m.

AAQS analyses were performed for PM₁₀, SO₂, NO_x and CO. PSD Class II analyses were done for PM, SO₂, and NO_x. PSD Class I analyses were performed for PM, SO₂, and NO_x for impacts on two Class I areas in Georgia. The Okefenokee Class I area is located approximately 63 km west of CCA and the Wolf Island Class I area is located 74 km to the north of CCA.

The results of these analyses and comparisons with the appropriate standards and increments are summarized in following tables:

AAQS Analyses (all values in ug/m)

Avg. Time	PM ₁₀		SO ₂ (near CCA)			NOx		CO	
	Annual	24-hr	Annual	3-hr	24-hr	Annual	1-hr	8-hr	
Maximum Predicted Concentration	41	138	42	783	230	83	629	261	
Includes Background Value	27	57	16	16	16	29	0	0	
AAQS	50	150	60	1300	260	100	*2000	*500	

*Significant impact levels which are much less than the standards.

PSD Increment Analyses (all values in ug/m³)

Class II Area

Avg. Time	PM		Annual	SO ₂		NOx Annual
	Annual	24-hr		3-hr	24-hr	
Maximum Predicted Consumption Concentration	0.3	22	<0.0	148	24	<0.0
Increment	19	37	20	512	91	25

Class I Areas

Avg. Time	PM		Annual	SO ₂		NOx Annual
	Annual	24-hr		3-hr	24-hr	
Maximum Predicted Increment Consumption	<0.0	0.1	0.0	8.4	1.2	0.04
Increment	5	10	2	25	5	2.5

The applicant did not model emissions from the noncriteria regulated pollutants Be and H₂SO₄ mist for which no ambient air quality standards have been defined under PSD rules.

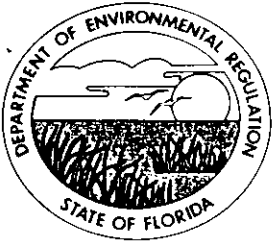
5. Additional Impacts Analysis

The maximum predicted concentrations from PM₁₀, SO₂, NO_x, and CO are predicted to be less than the AAQS, including the national secondary standards designed to protect public welfare-related values. As such no harmful effects on soils and vegetation is expected. The increased emissions at CCA are not expected to affect the visibility in the Okefenokee Class I area of the Wolf Island Class I area. In addition, the proposed modification will not significantly change employment, population, housing or commercial/industrial development in the area to the extent that a significant air quality impact will result.

IV. Conclusion

The emission limiting standards are in compliance with F.A.C. Chapter 17-2. The General and Specific Conditions listed in the proposed permits (attached) will assure compliance with all requirements of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July 1, 1989 version).

Based on the information provided by Container Corporation of America, the Department's Bureau of Air Monitoring and Assessment, and ITT Rayonier's compliance with the terms of the Department's Order to Amend Permits for Power Boilers, the Department has reasonable assurance that the proposed construction of a new batch digester system (No. 8) and a new brown stock washer system (C-Line), as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code. It is to be noted, that more refined evaluations regarding PSD increment consumption and ambient air quality standards will be required and is to be received no later than January 10, 1991.



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant 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 ft³. 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 SO₂ 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).

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 403.161, 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.

PERMITTEE:
Container Corporation of
America

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

GENERAL 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.

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

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 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit 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 SO₂ post-test results (actuals) established from the specific condition requirements contained in Construction Permits Nos. AC 45-141871, -141872, -141873 and -141877, a PSD SO₂ allowable emission limitation shall be established for the No. 4 lime kiln and its construction permit (AC 45-141877) shall be amended.

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 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 92,400 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

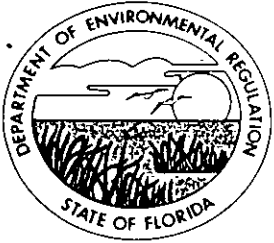
SPECIFIC CONDITIONS:

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 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).

Issued this _____ day
of _____, 1990

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

Dale Twachtmann, Secretary



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant 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.
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 - a. Mr. James T. Wilburn's letter of August 15, 1983.

PERMITTEE:
Container Corporation of
America

Permit Number: AC 45-190383
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.
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12. Data sheet received November 8, 1990 (hand delivered).
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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).
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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).

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 403.161, 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.

PERMITTEE:
Container Corporation of
America

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

GENERAL 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.

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

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 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit 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
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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, having a minimum removal efficiency of 95% for TRS.
3. For PSD purposes, the total BSWS's (A, B and C-Lines) maximum production rate shall not exceed 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. Maximum TRS allowable emissions shall not exceed 0.16 lbs/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:
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America

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SPECIFIC CONDITIONS:

14. 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 92,400 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 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).

Issued this _____ day
of _____, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary