

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

ATTORNEYS AT LAW

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HAROLD F. X. PURNELL
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THOMAS G. TOMASELLO
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SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

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

TELEPHONE (904) 877-0099
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JOHN H. MILLICAN
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

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

October 31, 1990

HAND DELIVERY

Mr. Clair Fancy
Central Air Permitting
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Container Corporation of America
Extension of Permitting Time;
Digester No. 8 and Brown Stock Washer

Dear Mr. Fancy:

Enclosed is a new Waiver of 90-Day Time Limit which extends the time for permitting the referenced sources to November 16, 1990.

Thank you for your efforts.

Sincerely,



R. L. Caleen, Jr.

Enclosure
RLC/l dm

cc: B. Mitchell

RECEIVED

OCT 31 1990

DER-BAQM

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTIONS 120.60(2) AND 403.0876, FLORIDA STATUTES

License (Permit, Certification/Construction Application No. Brown Stock Washer/No. 8 Batch Digester Systems)

Applicant's Name: Container Corporation of America

With regard to the above referenced application, the applicant hereby with full knowledge and understanding of applicant's rights under Section 120.60(2) and 403.0876, Florida Statutes, waives the right to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed by law. Said waiver is made freely and voluntarily by the applicant, with full knowledge, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 16th day of November, 1990

The undersigned is authorized to make this wavier on behalf of the applicant.



Signature Attorney for Container Corporation of America

R. L. Caleen, Jr

Name (Please Type or Print)

Oertel, Hoffman, Fernandez
& Cole, P.A.

P. O. Box 6507

Tallahassee, FL 32314-6507

Revised April, 1990



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

NORTHEAST DISTRICT - JACKSONVILLE

RECEIVED
OCT 25 1990
DER-BAQM

TO: Bruce Mitchell
FROM: Mort Benjamin MB
DATE: October 23, 1990
SUBJECT: Analysis of Projected Container Corp. Batch Digester Impact on Permitted Pulp and Black Liquor Solids

This analysis looks at the impact of the new batch digester. What will the net pulp production be with the projected 2800 tons/day of paper?

The summary indicates that the 2800 tons equates to 2940 tons ADP. Subtracting 250 tons old corrugated clippings leaves 2690 tons. Current digester (batch and Kamyrr) are permitted for 3210 tons/day.

How does the black liquor solids load to the recoveries look in terms of producing 2800 tons/day? For the last two years (schedule C) BLS/ADP have been 2170 lbs and 2116 lbs respectively. Using the 1989 figure, 1928 tons BLS are projected compared to a permitted 3531 tons.

How does the change in batch digester operation compare with present and permitted pulp production?

Schedule D indicates (from 1989 AOR) batch digester production of 637 tons and Kamyrr 1316.7 tons. Permitted are 1391 and 1819 tons respectively. Permitted tonnage will be 2690 which is well under the permitted. 520 more tons of ADP are needed to make the anticipated tonnage.

If OCC is increased in the future, the impact on pulp production might be less.

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Bruce Mitchell

Initial

Date

2.

Air

TT

Initial

Date

3.

Tally

Rm 310 D

Initial

Date

4.

Initial

Date

REMARKS:

*Rnd is reviewed 10/25/90
@ 11:31 p.m.*

RECEIVED

OCT 25 1990

DER-BAQM

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

Air / Gap

DATE

PHONE

SUMMARY

<u>Projected Production - Tons/Day</u>			
<u>Paper</u>	<u>As Pulp</u>	<u>OCC</u>	<u>Net Pulp</u>
2800	2940	250	2690

<u>Projected BLS to Recoveries - Tons/Day</u>		
<u>Permitted</u>	<u>1989 BLS/ADP</u>	<u>Anticipated Tons/Day</u>
3531	2170	2918

<u>Anticipated Production Increase - Tons/Day</u>				<u>Projected</u>	<u>Net Inc</u>
<u>1989</u>		<u>Permitted</u>			
<u>Kamyr</u>	<u>Batch</u>	<u>Kamyr</u>	<u>Batch</u>		
1316.7	637.5	1819	1391	---	
	1954.2		3210	2690	520

736
 - 250
 486

CONTAINER CORPORATION MEMO

Goal 1991

2800 Tons paper production per day
convert to ADP X 1.05
2940 ADT
- 250 Old Corrugated Cuttings
2690 Pulp required

at 2170 lb BLS/Ton
 $2690 \times \frac{2170}{2000} = 2918$ Tons BLS/Day

From Permits for No. 4 and No. 5 Recovery

No. 4 137,500 lb BLS/Hr
No. 5 156,780 294,280

Per Day
 $\frac{294,280}{2000} \times 24 = 3531$ Tons BLS/Day

Schedule B

Analysis of Projected
Production and Recovery
Black Liquor Solids

1989 Annual Operating Report

Wood Kamy 856,567 Tons
 Batch 451,594 Tons

Pulp Kamy 471,112 Tons
 Batch 225,797 Tons 696,909 Tons

BLS #4 RB 340,337 Tons
 #5 RB 415,967 Tons 756,304 Tons

$$\text{lb BLS/Pulp Ton} = \frac{756,304}{696,909} \times 2000 = \underline{2170}$$

Note: 1988 BLS/ADT = 2116

Analysis of Present Daily Production
and Projected Production

1989 Annual Operating Report

Batch Dig	225,797 Tons:	8501 Hours
Kamyr Dig	471,112	8585 Hours

	<u>Tons/Day</u>	<u>Permitted Tons/Day</u>
Batch	637.5	1391
Kamyr	1316.7	1819
	<u>1954.2</u>	<u>3210</u>

Projected by Container 2690 Tons
Net Increase . 520 Tons



CONTAINER CORPORATION OF AMERICA

AN AFFILIATE OF JEFFERSON SMURFIT CORPORATION

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

October 18, 1990

Mr. Clair Fancy
Central Air Permitting
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32344-2900

Re: Container Corporation of America;
Limited Waiver of 90-day Time Limit --
Construction Permits for Brownstock Washer
and Batch Digester System

RECEIVED
OCT 19 1990
DER-BAQM

Dear Mr. Fancy:

A representative of Oertel and Hoffman delivered to your attention a limited waiver, signed by me, of the 90-day time limit for the referenced permits. The extension expires on Friday, November 2, 1990.

This extension is granted to allow an opportunity to meet with you and others at DER to discuss permitting timing and requirements and the appropriateness of preparing and submitting additional information.

The statement you requested reconfirming my commitment, along with that of the entire CCA Fernandina Mill, to comply with all applicable environmental rules and regulations is enclosed.

In addition, I am pleased to provide you with an advance copy of Container Today, a news paper insert that will be placed in the October 24, 1990 Fernandina Beach Newspaper and the Florida Times Union edition circulated in Nassau County on October 30, 1990.

Sincerely yours,

Wayne S. Barlow
Vice President and
General Manager

/dsm



CONTAINER CORPORATION OF AMERICA

AN AFFILIATE OF JEFFERSON SMURFIT CORPORATION

Mill Division

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

October 18, 1990

Mr. Clair Fancy
Central Air Permitting
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32344-2900

Re: Container Corporation of America;
Limited Waiver of 90-day Time Limit --
Construction Permits for Brownstock Washer
and Batch Digester Systems

Dear Mr. Fancy:

This is in response to the concerns you and DER staff expressed yesterday concerning past enforcement actions at the CCA Fernadina Beach Mill and other JSC/CCA facilities in Florida and our commitment to environmental compliance. As I emphasized yesterday, our mill is committed to complying with all environmental regulatory requirements and fulfilling its responsibilities as a valued member of the community.

As we discussed, we believe many past problems arose not from a lack of effort or expenditures by the mill for environmental compliance, but from a failure to maintain adequate communications between mill and the DER and the community. Since I arrived at the mill, we have improved communications with the DER staff, both at the central and northeast office. Similarly, we have listened and responded to community concerns and are working with the community to make this an even better place to live and raise our families.

I place a high value on candor and personal integrity. They are the keys to building mutual respect and trust between people. As I told you at our meeting, we intend to operate our mill and its numerous pollution control facilities in compliance with Florida and federal statutes and the DER and EPA rules and permits. I personally will do everything within my authority to see that this commitment is kept in the years ahead. At the same time, we hope that the DER will keep us informed on a regular bases if DER perceives a problem, so that it can be a ddressed early before becoming a major issue.

October 18, 1990
Mr. Clair Fancy
Page - 2 -

Accidents happen; mistakes will be made. But when they do, we will be forthright with you and try to learn from these.

I am proud of our company, this mill, and our dedicated employees. I have no doubts that, working together, we will be able to accomplish this objective in the years ahead.

If ever you, or any other member of the DER staff, has any concerns about our mill or its performance, please do not hesitate to contact me personally regarding them.

Sincerely yours,



Wayne S. Barlow
Vice President and
General Manager

/dsm

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

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October 18, 1990

RECEIVED

OCT 18 1990

DER-BAQM

HAND DELIVERY

Mr. Clair Fancy
Central Air Permitting
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Waiver of 90-Day Time Limit
Container Corporation of America

Dear Mr. Fancy:

Enclosed is the original Waiver of 90-Day Time Limit executed by Mr. Wayne Barlow of the Container Corporation of America. You will be receiving a letter by Federal Express (for delivery tomorrow) from Mr. Barlow, but he asked that we deliver the enclosed to you today. The Waiver is set to expire on Friday, November 2, 1990.

If you should have any questions, please feel free to contact my office.

Sincerely,


Segundo J. Fernandez

SJF:nhg

Enclosure

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

Construction
License (Permit, Certification) / Application No. Brownstock Washer/
Batch Diester Systems

Applicant's Name: Container Corporation of America

With regard to the above referenced application, the applicant hereby with full knowledge and understanding of applicant's rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed by law. Said waiver is made freely and voluntarily by the applicant, with full knowledge, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 2nd day of November 1990.

The undersigned is authorized to make this waiver on behalf of the applicant.


Signature

WAYNE S. BARLOW
Name (Please Type or Print)



CONTAINER CORPORATION OF AMERICA

AN AFFILIATE OF JEFFERSON SMURFIT CORPORATION

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

FERNANDINA BEACH MILL

Mission Statement

- To consistently meet our customers' needs while achieving our production goals as a low-cost producer. In doing so, we must provide a safe working environment and growth opportunities for our employees while participating as a responsible and valued citizen in our community.

General Information

- Fernandina Beach Mill, established in 1937, is a fully integrated Kraft linerboard mill.
- The 550 mill employees, with an annual payroll of more than \$25 million, produce more than 790,000 tons of paperboard each year or approximately 2,200 tons each day.
- Fernandina Mill currently has a land base of 630,000 acres. Of this, 460,000 acres are owned or fee simple land and 170,000 are leased.

Process and Equipment

- The mill consumes approximately 3,000 cords of wood per day consisting of approximately 60% roundwood (logs) and 40% purchased chips.
- The mill utilizes an average of 250 tons/day of recycled old corrugated containers (OCC).
- The pulp mill includes one Kamyr continuous digester and seven batch digesters which have the capability of producing about 2400 tons/day of unbleached Kraft pulp.
- The paper mill consists of two active fourdrinier paper machines of nominal 244 inch trim. The machine speeds vary with the grade mix but are capable of obtaining speeds of 2500 feet per minute.

Process and Equipment - Cont'd

- An automated roll finishing department handles approximately 900 rolls of paper each day, distributing them to our over 400 customers by truck, rail, and utilizing the nearby port facilities.

Utilities

- The mill is self-sufficient in power and produces about 80 megawatts/day, 10 of which are sold to a local utility company in a co-generation program.
- Power is produced through the use of two power boilers which burn bark, coal, and oil and by two recovery boilers which burn black liquor in the chemical recovery process.
- The average mill water consumption is 15 million gallons/day all of which is drawn from 1,000+ foot deep wells.

Safety

- The Fernandina Beach Mill has shown an 88% improvement in safety performance over the last three years.
- The mill received the Most Improved Safety Performance Award for Southern Pulp and Paper Mills (one-two million manhours) in both 1987 and 1989.
- The mill safety program includes an active millwide safety committee, chaired by an hourly employee, that has been instrumental in providing positive direction for our programs.

Environmental Efforts

- Through capital expenditures and equipment upgrades, the mill has reduced particulate emissions (smoke) by 73% since 1982.
- The TRS control project, scheduled for completion on June 1, 1990, will reduce odorous emissions from the regulated sources at the mill by over 99%.

Environmental Efforts - Cont'd

- The mill operates a wastewater treatment system utilizing a UNOX oxygen-activated sludge secondary system, which maintains discharged wastewater well within all State and Federal limitations.
- Through water conservation and re-use, the mill has reduced wastewater flow by 2.5 million gallons per day since 1984. Several additional conservation programs are currently being implemented.

Recent Major Capital Expenditures

- Fernandina Mill Optimization Project (FMOP), most of which was completed in 1985, included a complete upgrade of the woodyard, papermachines numbers 3 and 4, and roll handling at a total cost of over \$150 million.
- TRS Control Project, scheduled for final completion in June, 1990, includes installation of a new 600 ton per day lime kiln replacing the existing two kilns, new blow heat recovery system for the batch digesters, TRS scrubbers and NCG incineration systems to control odorous emissions, at a total cost of \$29 million.
- Phoenix Project, scheduled for completion in October, 1991, includes the rebuild and upgrade of the idle No. 2 papermachine, construction of one additional batch digester, and installation of a new pulp washing line. The re-start of this machine will bring the mill production to approximately 2,800 tons per day. Cost of this project will be \$87 million.



JEFFERSON SMURFIT CORPORATION & CONTAINER CORPORATION OF AMERICA

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

FERNANDINA CONTAINER DIVISION

OUR FERNANDINA SHIPPING CONTAINER PLANT BEGAN OPERATION ON AUGUST 10, 1954. IT IS LOCATED ON THE SAME PROPERTY AS THE FERNANDINA PAPER MILL ESTABLISHED IN 1937.

OUR FERNANDINA BEACH FACILITY IS 135,000 SQUARE FEET IN TOTAL. PERIODIC ADDITIONS HAVE KEPT THIS PLANT COMPLETELY UPDATED WITH THE LATEST FABRICATING EQUIPMENT.

LAST YEAR THE PLANT HAD AN AVERAGE 53MM SQUARE FEET A MONTH WITH A FINAL 635MM FOR THE YEAR. THIS YEAR IT HAS AVERAGED 58MM PER MONTH WITH A TOTAL TO DATE OF 232MM. THIS HAS BEEN ACCOMPLISHED WITH 91 HOURLY AND 13 SALARIED EMPLOYEES.

CORRUGATOR DEPARTMENT

TO MEET OUR CUSTOMER NEEDS, THE FERNANDINA PLANT IS EQUIPPED WITH A MODERN HIGH SPEED 96" LANGSTON CORRUGATOR WHICH HAS THE CAPABILITIES OF PRODUCING B OR C FLUTE BOARD OR TO COMBINE TWO OF THE FLUTES TO FORM DOUBLEWALL BOARD. GREAT KNOWLEDGE AND SKILL IS REQUIRED TO ASSURE THAT THE CORRECT ADHESIVE, MOISTURE, HEAT, PRESSURE AND SPEED ARE USED TO PRODUCE THE

HIGHEST QUALITY BOARD. AUTOMATIC SPLICERS, WARP CONTROL SYSTEMS, JET SET, AUTOMATIC STACKER, DIRECT DRIVE KNIFE AND A MITSUBISHI C-FLUTER HAVE BEEN ADDED OVER THE LAST SEVERAL YEARS TO HELP INCREASE EFFICIENCY AND IMPROVE QUALITY.

PRINTING DEPARTMENT

THIS DEPARTMENT HAS TWO FLEXPAPER FOLDER-GLUERS WHICH PRINT, SCORE, SLOT, FOLD, AND GLUE THE CONTAINERS ALL IN ONE OPERATION. ONE FLEXPAPER HAS TWO-COLOR CAPABILITIES, WHILE THE OTHER CAN PRINT THREE COLORS AT ONE TIME. WE HAVE A TWO-COLOR FLEXPAPER ROTARY DIE PRESS AND A TWO-COLOR FLEXPAPER PRINTER. THE FLEXPAPER PRINTER RUNS ALL OF OUR BEER TRAYS. WE ALSO HAVE ONE OF THE LARGEST LETTER PRESSES IN OUR AREA. THIS MACHINE CAN PRINT TWO COLORS AND HAS THE CAPABILITIES OF RUNNING SHEETS UP TO 95" WIDE AND 180" LONG. ALL FLEXPAPER PRESSES AND OUR LETTER PRESS USE RUBBER OR PHOTOPOLYMER PRINTING PLATES THAT PICK UP WATERBASED INKS OR PASTE AND TRANSFER THE IMAGES TO THE BOARDS AS THEY PASS THROUGH.

Rab
10-16-90
2:30 pm meeting
@ DARM conf. rm.

I.

**ENVIRONMENTAL HOTLINE
FOR SECURITY STAFF**

DATE _____ TIME _____ TIME OF OCCURRENCE _____

COMPLAINANT NAME _____ TELEPHONE _____

ADDRESS _____

TELEPHONE NUMBER DURING NORMAL BUSINESS HOURS _____

NATURE OF COMPLAINT [Request a detailed description of episode. (ie Is the problem air or water related; odor, fallout, color of emission etc.) Determine location if different from complainants address.]

NOTE: IT IS IMPORTANT THAT INFORMATION REGARDING THE NATURE OF THE COMPLAINT IS ACCURATE AND CONCISE TO HELP FACILITATE A RAPID INVESTIGATION AND CORRECTIVE MEASURES TO BE TAKEN. ASK CALLER TO DESCRIBE REASON FOR COMPLAINT. CHECK THE ITEMS THAT APPLY.

AIR _____

FALLOUT _____ SOLID _____ DUST _____ LIQUID _____ ODOR _____

COLOR: WHITE _____ GRAY _____ BLACK _____ OTHER _____

WATER _____

FOAM _____ COLOR _____ OIL SHEEN _____ SOLIDS _____

OTHER _____

USING THE CALLER'S WORDS, WRITE A SHORT DESCRIPTION OF THE INCIDENT.

SIGNATURE _____

INFORM THE CALLER:

ON SITE AREA SUPERVISORS WILL BE CONTACTED IMMEDIATELY TO INVESTIGATE AND CORRECT THE CAUSE OF THE COMPLAINT IF POSSIBLE.

A REPRESENTATIVE FROM THE MILLS ENVIRONMENTAL GROUP WILL INVESTIGATE THE CAUSE AND FOLLOW UP WITH A RESPONSE TO THE CALLER THE NEXT BUSINESS DAY.

CONTACT THE POWER DEPARTMENT AND PULPMILL FOREMAN IN THE MILL.

PULPMILL FOREMAN _____ TIME OF CONTACT _____

POWER DEPT FOREMAN _____ TIME OF CONTACT _____

II.

HOTLINE INVESTIGATION FORM
FOR PRODUCTION FORMEN

PULPMILL FOREMAN

POWER DEPT FOREMAN

TIME CONTACTED BY MAIN GATE _____

INITIALS _____

Brief description of message received from guard: _____

INITIATE INVESTIGATION (If possible determine source, cause and corrective actions taken.)

CONTACT PRODUCTION SUPERINTENDENT(S) IF NECESSARY

PERSON CONTACTED _____

TIME OF CONTACT _____

REVIEW INVESTIGATION RESULTS WITH PRODUCTION SUPERINTENDENT(S) CHECK _____

+++++

FOLLOW UP CONVERSATION WITH COMPLAINANT (By environmental group next working day.)

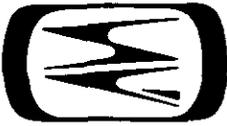
DATE _____

TIME _____

NATURE OF CONVERSATION _____

ENVIRONMENTAL SIGNATURE _____

DATE _____



CONTAINER CORPORATION OF AMERICA

AN AFFILIATE OF JEFFERSON SMURFIT CORPORATION

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

MAJOR ENVIRONMENTAL EXPENDITURES

9/4/90 Update

AIR QUALITY

#5 Power Boiler Precipitator Installed 1986	-	\$2.5MM
#4 Recovery Boiler Precipitator Rebuild 1988	-	\$2.5MM
#5 Recovery Boiler Precipitator Rebuild 1990	-	\$2.7MM
#4 Power Boiler Shutdown - 1988		
#4 Lime Kiln Built & Started Up W/ESP Control 1989	-	\$17MM
#2 & #3 Lime Kilns Shut Down - 1990		

RESULTS: Particulate Emissions Reduction of 73% Since 1982

TRS Control Project (Odor Reduction)	-	\$26MM
--------------------------------------	---	--------

Fully operational by June 1990

Reduce odorous TRS emissions by over 99%
for the affected sources including:

Lime Kiln - started up 12/89

Batch Digesters - started up 5/90

Kamyr Digester - started up 5/90

No. 5 MEE - started up 6/90

Tall Oil Plant - completed 1989

No. 4 Smelt Tank - completed 1989

No. 4 Recovery Boiler - completed 1988

Average Maintenance on Pollution Control Equipment In Addition to Major Rebuilds	-	\$2MM/Yr
---	---	----------

WASTEWATER DISCHARGE FACTS

Primary Clarifier - installed 1972

UNOX activated sludge system with cryogenic oxygen secondary treatment system installed 1976.

Wastewater flow - 1984 17.0 mgd
1989 14.5 mgd

15% REDUCTION SINCE 1984 AMOUNTS TO 2.5 MILLION GALLONS/DAY

Permit limits - Limits set by USEPA and FDER, based on production.

CURRENTLY AVERAGING 65% OF PERMIT LIMITS

Occasional daily exceedance due primarily to upsets/spills and power outages.

RECENT EXPENDITURES:

Screw dewatering press installed 1989 - \$750,000

Bar screen installed 1988 at grit chamber - \$125,000

Reverse Osmosis boiler water treatment installed 1989 - \$4.5 million

Sirrime Environmental Consultants evaluation of the treatment system - \$50,000

CURRENT PROJECTS:

Additional screw press - Planned for 1990 start-up - cost \$650,000

Spill Containment - Several systems in the mill are being installed or upgraded to reduce the impact of process upsets and spills - cost \$300,000+

Power Distribution System - Many improvements have been made in recent years, and several more are planned for 1990 which will improve power system reliability - cost \$1.0 million

Spill Pond - A dedicated spill diversion pond is being planned to divert spills from treatment

PARTICULATE MATTER EMISSIONS SUMMARY

10/16/90 UPDATE

EMISSIONS TONS/YEAR

SOURCE	PERMIT	1982*	1988*	1990**
NO. 3 PB	-	106	0	0
NO. 4 PB	326	287	19	0
NO. 5 PB	599	552	31	31
NO. 7 PB	428	0	40	40
NO. 2 LK	77	65	46	0
NO. 3 LK	87	84	69	0
NO. 4 LK	190	0	0	30
NO. 3 RB	-	130	0	0
NO. 4 RB	589	523	342	256
NO. 4 SDT	122	113	99	21
NO. 5 RB	357	337	152	150
NO. 5 SDT	67	56	25	25
	2842	2263	823	553

1988 - 63% REDUCTION IN PM SINCE 1982

1990 - 75% REDUCTION IN PM SINCE 1982

- 33% REDUCTION IN PM SINCE 1988

* BASED ON ANNUAL EMISSIONS SUMMARIES

** BASED ON 1990 STACK TEST RESULTS (USED IN ANNUAL EMISSION SUMMARY)

ABOUT NO. 4 LIME KILN

- No. 4 Lime Kiln replaces the older Nos. 2 & 3 kilns which are no longer in operation.
- At 600 tons per day input rating, No. 4 Kiln is the second largest lime re-burning kiln currently in operation in the world.
- The dimensions of the kiln are 14 feet in diameter and 380 feet in length.
- No. 4 Kiln is used to re-convert calcium carbonate to calcium oxide (lime) as part of the kraft chemical recovery cycle.
- No. 4 Kiln is the primary device for the incineration of TRS gases collected from the pulping process.

JSC/CCA



**WORKING TOGETHER
FOR A BETTER
COMMUNITY.**

**Jefferson Smurfit Corporation
Container Corporation of America**

Fernandina Beach Mill
Fernandina Beach, Florida



Welcomes You
To The
Dedication Ceremony
For Its
TRS Control Project
& No. 4 Lime Kiln

August 16, 1990

JSC/CCA

Fernandina Beach Mill

Dedication Ceremony

AGENDA

11:00 - 11:05 AM

Welcome and Introduction,
Wayne Barlow - Vice President
& General Manager, Fernandina Mill
Dick Quina - Vice President &
General Manager, JSC/CCA
Containerboard Mill Division

11:05 - 11:15 AM

TRS Project Overview,
Ron Caffo, Sr. Project Manager

11:15 - 11:30 AM

Transportation To Dedication
Site Provided by Mill

11:30 - 12:00 PM

Formal Dedication and Ribbon
Cutting Ceremony

12:00 - 1:00 PM

Transportation Back to Dining Room,
Followed by Complimentary Buffet
Lunch

TRS FACT SHEET

What is TRS?

- TRS stands for a family of odorous compounds called total reduced sulfur. In a kraft mill the principle compounds include hydrogen sulfide, dimethyl sulfide, dimethyl disulfide, and methyl mercaptan.

Where does TRS come from?

- TRS gases are evolved during the kraft pulping process as a result of a reaction between sulfur used in the cooking liquor and lignin present in the wood.

How can TRS emissions be controlled?

- The two methods generally used to control TRS emissions are caustic scrubbing and incineration. The Fernandina Mill uses both of these technologies. The primary control used is collection of TRS gases from the pulping process and incineration in the new No. 4 Lime Kiln.

How much is TRS reduced by these controls?

- By implementing the TRS control project, the Fernandina Beach Mill has reduced these emissions by over 99%.

How much material and manhours were involved in this project?

- 300,000 total construction manhours to install
- 50,000 lineal feet of pipe
- 3,000 cubic yards of concrete
- 750 tons of structural steel

How much did all this cost?

- The TRS Control Project cost approximately \$28 million.



CONTAINER CORPORATION OF AMERICA

AN AFFILIATE OF JEFFERSON SMURFIT CORPORATION

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

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 19, 1990

RECEIVED
JUL 23 1990
DER-BAQM

Mr. C.H. Fancy, P.E.
Chief, Bureau of Air Regulation
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Application to Construct Air Pollution Sources
AC 45-181406: Batch Digester No. 8
AC 45-181407: C-Line Brown Stock Washer

Ref: FDER June 28, 1990 Letter of Incompleteness

Dear Mr. Fancy:

This is in response to your letter of June 29, 1990 wherein you request Container Corporation submit additional information on the above noted applications to construct air pollution sources.

The following responds to your request. The numbering matches that used in your June 28 letter.

A. AC45-181406 - Batch Digester No. 8

1. Information on Batch Digester No. 8

Batch Digester No. 8 will have a nominal capacity/size of 6,000 cubic feet. Approximate overall dimensions are 14'-6" inside diameter by 58' height (nozzle to nozzle).

Mr. C.H. Fancy - Florida DER
RE: CCA Air Construction Permit Applications
July 19, 1990

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1. Batch Digester No. 8. (Cont'd)

A standard batch cook using digester No. 8 will involve the following mass balance:

- 6,000 ft³ of wood chips (normally pine) at a nominal 11 lbs bone dry weight per cubic foot.
- 21,000 gallons of charge liquor - 11,000 gallons of white liquor and 10,000 gallons of black liquor. This equates to approximately 185,000 lbs of liquor/cook.
- 40,000 lbs of 60 psig steam for pre-heating and 20,000 lbs of 160 psig cooking steam.
- 5,000 lbs of vent/relief gas, which goes to the batch digester turpentine recovery system.
- 36,600 lbs of air dried unbleached (cooked) pulp to the B blow tank
- 40,000 lbs of flashed steam to the batch digester blow heat recovery system.
- 275,000 lbs of black liquor recovered via the down-stage washer lines.

A complete cooking cycle (i.e., from start of digester fill through venting of all cooked pulp to the blow tank with vapors to the blow heat recovery system) will take approximately 110 minutes. Normally the above amounts are not converted to "hourly" rates since by its nature the batch process involves intermittent use/consumption of the various components.

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Re: CCA Air Construction Permit Applications
July 19, 1990

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2. Existing Batch Digesters 1-7

Each of the CCA Fernandina Mill's existing seven (7) batch digesters has a nominal capacity/size of 4,300 ft³. As established in the past (see CCA Fernandina TRS air construction permit application for the batch digesters) and resummarized below, the maximum capacity of these units is stated in terms of system capacity. Maximum system capacity for the present seven (7) batch digesters is:

- 101.5 tons/hour ADUP; and
- 1,391 tons/day ADUP.

Batch Digester System Capacity

The existing 7 batch digesters (and including the No. 8 unit when added) operate as a single system. Pulp production through this system varies due to several factors, which include: chip quality; type pulp being produced (softwood bottom liner; softwood top liner; softwood hi-yield; and hardwood); number of digesters being operated (conversely, the number down for maintenance); blow tank level; and the grade and product mix being produced on the mill's paper machines. It is thus misleading to assign a separate production/throughput to individual digesters.

The system figures represent the maximum hourly and daily production levels for the batch digester operation, given all the above (and other) factors and operating parameters. Moreover, this will hold true after the No. 8 digester is added.

Batch Digester No. 8

As stated in CCA Construction Permit Application AC 45-181406, maximum production/throughput for the batch digester system, including batch digester No. 8, will not change. Maximum pulp production will remain at:

- 101.5 tons/hour ADUP; and
- 1,391 tons/day ADUP.

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Re: CCA Air Construction Permit Applications
July 19, 1990

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These above rates were also specified in AC 45-141872. Thus, the aforementioned figures outlining nominal capacity for batch digester No. 8 are not and should not be viewed as a system capacity increase. The added unit merely allows the more efficient operation of the batch digester system.

3. TRS and Equivalent SO₂ Emissions

Actual TRS emissions from the existing batch digester system for the last 2 years can be estimated from the actual pulp production and emission factors. The last 2 years represent the highest years of production in the last 5 years. Pulp production from the batch digester system in 1989 was 225,797 tons of air dried unbleached pulp (ADUP). In 1988, production was 214,578 tons ADUP. The average for these two years was therefore 220,188 tons ADUP.

The best available emission factor for total reduced sulfur (TRS) emissions from a batch digester system (digester relief and blow tank) is based on the EPA publication "Kraft Pulping: Control of TRS Emissions From Existing Mills" (EPA 450/2-78-003b). The highest emission factor presented is 10.5 lb/ton ADUP (hydrogen sulfide plus other reduced sulfur compounds). This emission factor has been used by CCA as the basis of previous TRS emission estimates from the mill. Using this emission factor, the average TRS emissions for the last two years are:

$$220,188 \text{ tons/yr} \times 10.5 \text{ lb/ton} / 2,000 \text{ lb/ton} = 1,156.0 \text{ tons/yr TRS}$$

Equivalent sulfur dioxide (SO₂) emissions are then calculated as follows:

$$1,156.0 \text{ tons/yr TRS} \times 64 \text{ lb SO}_2 / 34 \text{ lb H}_2\text{S} = 2,176.0 \text{ tons/yr SO}_2$$

Mr. C.H. Fancy - Florida DER
Re: CCA Air Construction Permit Applications
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4. Emission Comparison

The TRS gases from the batch digester system are now being incinerated in the No. 4 Lime Kiln. The allowable emissions from the No. 4 Lime Kiln are 11.5 tons/yr for TRS and 117.1 tons/yr for SO₂. Compared to the current actual emissions calculated in Item 3, there is a net decrease in TRS emissions of 1,144.5 tons/yr, and a net decrease in SO₂ emissions of 2,058.9 tons/yr.

5. Impact on Other Sources or Systems

No other source at the mill will undergo a physical change or change in the method of operation [as defined in Chapter 17-2.100(126) Florida Administrative Code (F.A.C.)] as a result of this modification.

6. PSD Determination

As demonstrated in Item 4, there will be no net increase in emissions as a result of this modification.

7. Derivation of 1.07 Factor

The 1.07 factor is the conversion factor to change air dried unbleached pulp (93.5 percent moisture) into bone dry unbleached pulp (0 percent moisture).

Mr. C.H. Fancy - Florida DER
Re: CCA Air Construction Permit Applications
July 19, 1990

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B. AC 45-181407: C-Line Brown Stock Washer System

1. Brown Stock Washer System Capacity

The maximum hourly input and product rates for the existing brown stock washer system is equal to the permitted production rate of the existing batch digester system. This rate is specified as 101.5 tons/hr and 1,391 tons/day ADUP in AC45-141872. On a bone dry basis, the rates would be 94.86 tons/hr and 1,300 tons/day. The brown stock washer system, with the addition of the new C-Line brown stock washer, will continue to be limited by the maximum production rate of the batch digester system, i.e., 101.5 tons/hr and 1,391 tons/day ADUP. As a result, there will be no change in the maximum hourly input and product rates for the brown stock washer system as a result of the requested change.

2. Net Change In Emissions

The A-Line and B-Line brown stock washers are not being modified, i.e., there will be no physical change or change in the method of operation of these sources. As a result, they are not considered in the calculation of the net change in emissions for PSD purposes. Emissions for the new C-Line washer are documented in the permit application and in Item 5 following, at 0.71 tons/year of TRS.

3. Impact on Other Sources or Systems

No other sources at the mill will be affected by this change, i.e., there will be no physical change in the method of operation as defined in Chapter 17-2.100(126), F.A.C.

4. PSD Determination

There will be a reduction in TRS emissions of up to 13.6 tons/yr from the brown stock washer system. The basis for this is the reduction in uncontrolled emissions from the current A and B washer lines. Moreover, the total contribution for the new C-Line washer is only 0.71 tons yr, which is well below the PSD significant emission rate of 10 tons/yr.

Mr. C.H. Fancy - Florida DER
Re: CCA Air Construction Permit Applications
July 19, 1990

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5. Correct Molecular Weight of H₂S

The correct molecular weight for TRS is 34. The revised TRS emission rate is 0.16 lb/hr and 0.71 tons/year. The efficiency of the scrubber system must therefore be 95 percent instead of the stated 94 percent. The revised calculations are:

Allowable TRS emissions (as H₂S):

$$PV = mRT$$

$$m = PV/RT$$

$$\text{Molecular weight H}_2\text{S} = 34$$

$$R = 45.44 \text{ ft-lb}_f/\text{lb}_m\text{-}^\circ\text{R}$$

$$m = \frac{2,116.8 \text{ lb}_f}{\text{ft}^2} \times \frac{6,775 \text{ ft}^3}{\text{min}} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{\text{lb}_m\text{-}^\circ\text{R}}{45.44 \text{ ft-lb}_f} \\ \times \frac{1}{580 \text{ }^\circ\text{R}} \times \frac{5}{10^6} = 0.163 \text{ lb/hr as H}_2\text{S}$$

$$0.163 \text{ lb/hr} \times 8,760 \text{ hr/yr} / 2,000 \text{ lb/ton} = 0.71 \text{ ton/yr}$$

Scrubber Efficiency:

$$\text{TRS in} = 3.27 \text{ lb/hr}$$

$$\text{TRS out} = 0.16 \text{ lb/hr}$$

$$\text{Efficiency} = [(3.27 - 0.16)/3.27] \times 100 = 95\%$$

Mr. C.H. Fancy - Florida DER
Re: CCA Air Construction Permit Applications
July 19, 1990

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We believe the above responses and information address the questions raised in your June 28, 1990 letter. However, if you have any further questions or comments, please contact either Roger Hagan (277-5808) or Ron Caffo (277-5732).

Sincerely,



Wayne S. Barlow
Vice President & General Manager

cc: A. Kutyna, FDER - NE District, Jax ✓
D. Buff - KBN Engineering
T. Cole - Ortel & Hoffman
J.P. Subramani - Ortel & Hoffman
Bruce Mitchell } 7/24/90 ASL
BAICHT }



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

June 28, 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:

Re: Applications to Construct Air Pollution Sources
AC 45-181406: Batch Digester No. 8
AC 45-181407: C-Line Brown Stock Washer

The Department has reviewed the above referenced application packages received May 31, 1990. Based on a review of the material, the applications are deemed incomplete. Please submit to the Bureau of Air Regulation the following information, including all assumptions, calculations and reference material, and the status will, again, be ascertained:

A. AC 45-181406: Batch Digester No. 8

1. What is the capacity of the new batch digester in terms of cubic feet? What is the maximum raw materials and chemicals that can be digested/processed in a single batch mode and hourly basis? What is the maximum product that can be attained in a single batch mode and hourly basis and in terms of air dried unbleached pulp (ADUP).
2. Referencing No. A.1., provide the same information on the existing batch digesters Nos. 1-7.
3. Calculate the annual actual TRS and its equivalent SO_2 emissions from the existing batch digester system, which should reflect the average of the actual hours of operation of the two highest years, but within the last five years, multiplied times the actual pollutant emission rate (either measured or an acceptable emission factor).

Mr. Wayne Barlow
Page Two
June 28, 1990

4. Compare the values obtained in No. A.3. to the newly proposed potential pollutant emissions in order to establish the net change in pollutants.
 5. If any source or system (i.e., MEEs, RBs, SDTs, lime kiln, slakers, etc.) will be affected by this modification request, please calculate the net changes of all affected pollutants (actuals vs. future potentials) on a per source or system basis.
 6. If the total net changes of any pollutant exceeds the levels contained in Table 500-2, F.A.C. Chapter 17-2, than submit the necessary information to satisfy the requirements of F.A.C. Rule 17-2.500(5), Prevention of Significant Deterioration - New Source Review.
 7. In Attachment B, Section I.B., what is the 1.07 factor in the denominator represent and what is its derivation based on?
- B. AC 45-181407: C-Lime Brown Stock Washer
1. What is the maximum hourly change in terms of raw materials and chemicals/used and in terms of product, both bone dry and ADUP, from the current existing system and with the addition of the new C-Lime Brown Stock Washer?
 2. Referencing No. B.1., calculate the net change in pollutant emissions (actuals vs. future potentials).
 3. If any source or system (i.e., MEEs, RBs, SDTs, lime kiln, slakers, etc.) will be affected by this modification request, please calculate the net changes of all affected pollutants (actuals vs. future potentials) on a per source or system basis.
 4. If the total net changes of any pollutant exceeds the levels contained in Table 500-2, F.A.C. Chapter 17-2, than submit the necessary information to satisfy the requirements of F.A.C. Rule 17-2.500(5), Prevention of Significant Deterioration - New Source Review.
 5. In Attachment A., Section III.B, Emission Calculations, an error in the molecular weight of H₂S is noted. Please correct and recalculate the potential TRS emissions. Also, recalculate the efficiency of the proposed scrubber system.

Mr. Wayne Barlow
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June 28, 1990

In addition to the incompleteness issues raised above, the Department may not be able to issue the requested construction permits due to the pending Department enforcement action and in accordance with F.A.C. Rule 17-4.070(5), Standards for Issuing or Denying Permits.

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

Sincerely,



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

CHF/BM/t

attachments

cc: A. Kutyna, NE District
D. Buff, P.E., KBN
C. Forthman, OGC
D. Schwartz, OGC
J. Chisolm, OGC
J. Subramani, O, H, F & C



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

APR 4 1990

4APT-AEB

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APR 09 1990

DER-BAQM

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

RE: Florida Crushed Stone (PSD-FL-091)

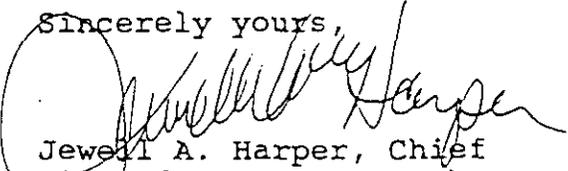
Dear Mr. Fancy:

This is to acknowledge receipt of your letter dated March 15, 1990, transmitting a request by Florida Crushed Stone to amend their prevention of significant deterioration (PSD) permit to allow the burning of tire derived fuel (TDF) in their cement kiln. The current permit for the source limits the fuel of the kiln to coal only. As discussed between Mr. Bruce Mitchell of your staff and Mr. Gregg Worley of my staff on March 30, 1990, we have the following comments.

Under the scenario presented by the source, the switch to the use of TDF in the kiln would not constitute a major modification for the purposes of PSD provided that the increase in pollutants due to the fuel switch did not exceed significant emissions increase levels. It is important to note that the change in emissions must be evaluated from "old actual" to "new allowable" emissions. The old actual emissions must be based on the previous two years of operating data unless some other period is deemed to be more representative of normal operating conditions. The new allowable emissions will be those emissions which are reflected in the amended permit. Also, it was noted that the list of pollutants to be tested did not include benzene. Since benzene is a pollutant regulated under the Clean Air Act for which a significant emissions rate has not been established, any increase of emissions of benzene would subject the source to PSD.

Thank you for the opportunity to review and comment on this package. If you have any further questions or comments, please do not hesitate to contact Mr. Gregg Worley of my staff at 404/347-2864.

Sincerely yours,


Jewel A. Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

APR 4 1990

4APT-AEB

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APR 09 1990

DER-BAQ:m

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

RE: Seminole Kraft Corporation (PSD-FL-141)

Dear Mr. Fancy:

This is to acknowledge receipt of a package from your office transmitting a request from Seminole Kraft Corporation to modify their prevention of significant deterioration (PSD) permit, dated February 16, 1990. As discussed between Mr. Pradeep Raval of your staff and Mr. Gregg Worley of my staff on March 30, 1990, we have the following comments.

CREDITABLE EMISSIONS REDUCTIONS

The source has requested that conditions be placed in the PSD permit to allow them the flexibility to convert to 100% recycled fiber in lieu of constructing the new recovery boiler. In the event that the source makes the decision to convert to recycled fiber, the source would like to retain emissions credit for the units which would be shut down at the facility (i.e., the existing kraft pulp mill). The credit for shutting down any units may be retained but we must emphasize that such credit must be based on actual operating data from the two years previous to the shutdown, unless another time period is determined to be more representative of actual operating conditions. The information submitted by Seminole Kraft is based on the years 1983-84. Apparently the source used the operating hours of this time period along with presently permitted allowable emission rates to arrive at their creditable emission reductions. This is not acceptable. We would suggest that it would be prudent of FDER to require testing of the units prior to shutdown for the pollutants which are to be credited. In any case, the actual emission rates must be used rather than the permitted allowable rates unless the actual emissions exceed the allowable emissions.

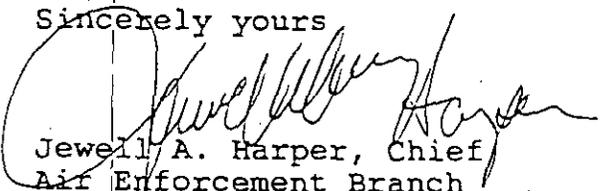
In a related matter, we do not think it is wise to include as a permit condition the language suggested by the source in provision 15 (d) which specifies what credits are available prior to the shutdown of the units. It appears that such a provision would lock FDER into accepting those numbers as creditable emissions no matter what the source operation was prior to shutdown. The fact that emissions resulting from federally enforceable shutdowns are creditable does not need to be established in a permit; the fact that such emissions are creditable is already established in federal and Florida regulations. In addition, the contemporaneous time period for which the emissions are creditable is established in regulations. Thus, it is redundant to state that "...the following emissions reductions will be available to Seminole Kraft for five (5) years from the date construction on this alternative is complete or November 12, 1992, whichever is earlier." By establishing a federally enforceable shutdown date at the completion of construction or November 12, 1992, whichever is earlier, it is understood that emissions credit is available for a period of five years from that point.

EFFECT ON THE AES CEDAR BAY PROJECT

The AES project which is currently under review for permitting plans to use the ambient impacts of shutting down several units at Seminole Kraft in their air quality analysis. How will the proposed permit amendment by Seminole Kraft affect the AES project?

Thank you for the opportunity to review and comment on this proposal by Seminole Kraft. If you have any questions or comments on this matter, please do not hesitate to contact Mr. Gregg Worley of my staff at 404/347-2864.

Sincerely yours



Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division