STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

August 8, 1983

Mr. M. L. Woehle
Vice President & Resident Manager
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

Dear Mr. Woehle:

The bureau is in receipt of your request to extend the expiration date and to correct a typographical error of the control devices identification numbers contained in the construction permit, No. AC 45-61751, issued July 7, 1983. The request is acceptable and the following changes to the permit are:

Expiration Date:

From: January 31, 1984
To: July 31, 1984

Typographical Error: Page 1, paragraph 2, of the Permit

From: The pollution control devices will be the existing Lime Kilns Nos. 3 and 4.

To: The pollution control devices will be the existing Lime Kilns Nos. 3 and 2.

Attachment to be incorporated is:

8. M. L. Woehle's letter dated July 21, 1983.

This letter and attachment must be attached to your permit, No. AC 45-61751, and shall become a part of that permit.

Sincerely,

Victoria J. Tschinkel
Secretary

VJT/bmm

cc: John Ketteringham
Roland L. Allen, Jr.

ATTACHMENT 8

Container Corporation of America

Paper Mill Division
North Eighth Street
Fernandina Beach, Florida 32034
Phone: 904 261-5551

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 21, 1983

C. H. Fancy, P. E.
Deputy Bureau Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

DER
JUL 26 1983
BAQM

Re: Container Corporation of America
Fernandina Beach Mill - Evaporator
System No. 6
Permit/Certification No. AC45-61751

Dear Mr. Fancy:

We acknowledge receipt of the Florida Department of Environmental Regulation Permit/Certification Number AC45-61751 as transmitted by your letter of July 7, 1983. We have reviewed the permit for our mill's No. 6 Evaporator and have the following comments about the permit:

1. We request that the expiration date be changed from January 31, 1984 to July 31, 1984 because construction will not be finished until late in the year and we will need to apply for the operating permit 90 days before the construction permit expires.

2. On Page 1, paragraph 2, of the Permit, there is a typographical error that says, "Lime Kilns Nos. 3 and 4." It should read: "Lime Kilns Nos. 3 and 2."

If you have any additional questions, please contact Miss Cynthia Sawyer at (904) 261-5551.

Sincerely,

CONTAINER CORPORATION OF AMERICA
Fernandina Beach Mill Division

M. L. Woehle
Vice President & Resident Manager

/jm

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

July 7, 1983

Max Woehle, General Manager
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

Dear Mr. Woehle:

Enclosed is Permit Number AC 45-61751 dated July 7, 1983, to Container Corporation of America, issued pursuant to Section 403, Florida Statutes.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

C. H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality
Management

CHF/bjm

Enclosure

cc: Roland L. Allen, Jr., Paper Industry Engineers, Inc.
John Ketteringham, Northeast District

Final Determination

Container Corporation of America
Fernandina Beach, Florida

Application Number:
AC 45-61751

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

Final Determination
Container Corporation of America
New Multiple Effect Evaporator Set and Concentrator Nos. 6

The construction permit application has been reviewed by the department. Public notice of the department's intent to issue was published in the Florida Times-Union on April 1, 1983. The preliminary determination and technical evaluation was available for public inspection at the DER's Northeast District office and the DER's Bureau of Air Quality Management (BAQM) office.

Comments (Attachment No. 6) were received from Mr. Eric J. Schmidt with Container Corporation of America, Fernandina Beach, Nassau County, Florida, on April 25, 1983. A meeting was held in the BAQM conference room on June 3, 1983, to discuss the referenced comments (Attachment No. 6). As a result of this meeting (see Attachment No. 7), the bureau agrees with certain revisions to the "Specific Conditions" and they shall read (Note: Attachment No. 7 will explain the revamping of the Specific Condition numbering system):

Specific Conditions:

No. 4: The total maximum input of black liquor solids (BLS) into the multiple effect evaporator sets Nos. 3, 4, 5 and 6 shall not exceed 274,089 pounds per hour (calculated at 100% BLS, dry).

No. 6: The allowable emissions for all pollutants in compliance with 40 CFR 60.283(a)(1)(iii) shall be below the minimum detectable limit and within normal variability. Due to this constraint, stack mass emission tests shall be conducted on the Lime Kilns, No. 3 and No. 2, before and after start-up of the multiple effect evaporator set #6 for the pollutants PM (particulate matter), SO_2, and TRS. For TRS, the maximum emissions increase shall not exceed 5 ppm (parts per million). Stack tests for PM conducted as a requirement of operating permit conditions will be acceptable as a before test requirement. Test methods shall be EPA Methods 1, 2, 3, 4, 5 or 17, 6, and 16 in accordance with the NSPS, 40 CFR 60.285, Subpart BB and as described in Appendix A of this part (EPA Method 16A may be performed upon approval from the Region IV EPA via a written request to and through the DER's Bureau of Air Quality Management (BAQM)).

At least 30 days prior to the date of compliance testing, the DER's Northeast District office and the DER's BAQM shall be notified in writing in order to witness the test(s).

The compliance tests shall be conducted at 90 to 100 percent of the permitted maximum total input of black liquor solids into the multiple effect evaporator sets Nos. 3, 4, 5 and 6. Once this Specific Condition has been satisfactorily performed and approved by the DER's BAQM, this Specific Condition will not become a part of the operating permit.

No. 11: An annual report, by month, of the daily product yield in air dried unbleached pulp (ADUP; based on the applicant's yield of 2850 lbs BLS/ton ADUP) from the multiple effect evaporator sets Nos. 3, 4, 5 and 6 shall be submitted by the 14th of January of each calendar year to the DER's Northeast District office.

No. 12: The applicant will demonstrate compliance with the conditions of this construction permit and submit a complete application for an operating permit to the DER's Northeast District office prior to 90 days before the expiration date of this permit. The Certificate of Completion of Construction, DER Form 17-1.202(3), Florida Administrative Code, may be submitted in lieu of an application for a permit to operate. The applicant may continue to operate in compliance with all terms of this construction permit until its expiration date or the issuance of an operating permit.

Attachments to be incorporated are:

6. Eric J. Schmidt's letter dated April 20, 1983.

7. Memo to file dated July 5, 1983.

It is recommended that the construction permit be issued as drafted, with the above revisions and attachments incorporated.

ATTACHMENT 6

Container Corporation of America

Paper Mill Division

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-5551

April 20, 1983

Mr. William Thomas
Florida Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Building
Tallahassee, Florida 32301

Dear Mr. Thomas:

(1) This letter is in response to questions asked in my telephone conversation with you and your staff on April 5, 1983.

The questions concerned the capacity and operating modes of the proposed No. 6 Evaporator and its impact on the balance of the chemical recovery system. As stated in the telephone conversation, the new evaporator will not significant-
(2) ly alter the total amount of black liquor processed in the recovery system. The major purpose of the No. 6 Evaporator is to increase the energy efficiency and operating flexibility of our evaporation system and to allow us to evaporate the dilute streams we now pick up from spill collection systems designed to protect our wastewater treatment system. Of particular significance is that the new evaporator set uses significantly less energy to evaporate a gallon of water than do the existing evaporators, one of which will be retired from service when the new evaporator is installed.

The accompanying diagram demonstrates the "balance" we are trying to achieve.
(3) As shown in the diagram, the total evaporative capacity (with No. 2 retired and No. 6 added) is somewhat greater than the normal water flow from the washers. This is essential to afford the evaporative capacity for handling the extra water contributed by the spill collection systems.

Questions were also asked about the potential TRS emissions if the new evaporator set were operated in a mode other than 50% bleed back of its own product liquor to thicken the feed. In particular, I believe you were seeking assurances
(4) that even if there were some method of operation that would put the black liquor from all 2000 tons a day of pulp through No. 6 Evaporator so that all of the TRS were released there, the lime kiln would be able to handle the TRS emissions. This calculation has been provided in Attachment 2, which shows that the available oxygen in No. 3 Lime Kiln is over 90 times more than the maximum required to completely react with the TRS.

(5) In view of this and the information in our previous submissions, we believe Conditions 4 and 5 are unnecessary and should be deleted. However, as a

middle-ground we would accept replacing Conditions No. 4 and 5 with a single
(5) condition that reads as follows:

> The maximum input of black liquor solids into MEE No. 6 must not exceed 250,000 pounds an hour (calculated at 100% solids).

This is the quantity of solids that would go into No. 6 Evaporator if all of the thickened liquor from the existing evaporators were used to pre-thicken
(6) the feed to No. 6. (In this case, the percent solids in the feed to No. 6 would exceed 23%). As shown by the calculations in Attachment 2, the lime kiln has ample capacity to handle the TRS emissions in this situation, even if it is assumed that all of the TRS were released in No. 6 Evaporator.

Another matter we discussed on the 5th was the testing required in Condition No. 7. It is my understanding that we all agreed that the intent was to have a single before-and-after test to demonstrate that the system does work as theory and past applications indicate it will and that a similar testing
(7) provision (other than normal testing to demonstrate compliance with applicable regulations) will not be contained in the operating permit. It was also recognized that testing and operating variability made the before-and-after test meaningful only if there was a large increase in the after-test that was not explainable by a specific change in operating or testing conditions. It was suggested that the agency would add "within normal variability" at the end of the first sentence in Condition No. 7 to make clear that an apparent increase in the after-test that was within the range of normal operating and testing variability would still demonstrate that the system does work.

I also believe it was recognized that particulate emissions from the lime
(8) kiln should not be affected by the incineration and we again ask that references to particulate be deleted in Condition No. 7. Our particulate allowable for the lime kilns is not being increased as stated in specific Condition No. 8 and No. 9 and our normal testing will demonstrate compliance.

Finally, I again request that we be allowed to use the ITT Barton Continuous Titrator when testing for TRS. Use of U. S. EPA Method 16 would be costly
(9) and is not necessary, particularly since we are agreed that small changes in before and after emissions would not be significant. Since the testing is not mandated by U. S. EPA, but is being required solely to satisfy DER's own policies, there is no legal requirement that Method 16 be used.

With these understandings, and with the addition of the words "within nor-
(10) mal variability" and the deletion of references to particulate, Condition No. 7 is acceptable to us.

We do not see the purpose in quarterly reporting of calculated daily product
(11) yield in Condition 12 and ask that it be changed to reflect our normal practice of filing an annual operating report to the department.

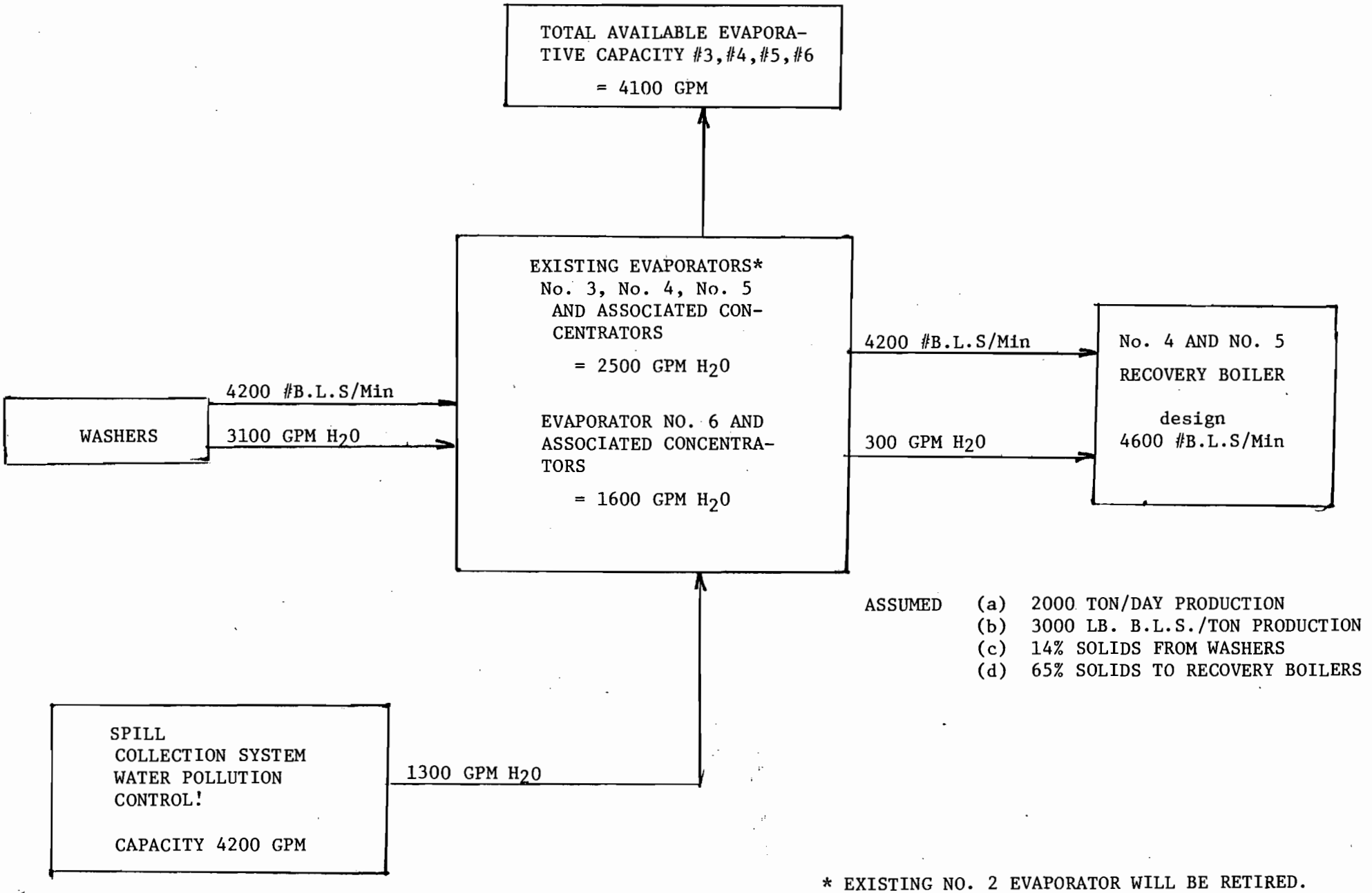
I hope that based on the above, we can quickly resolve this matter in a mutually acceptable manner. If you have any questions or wish to discuss
(12) any of this further, please call me at (904) 261-5551, extension 324. Also, we are willing to meet with you at your earliest convenience if this will be helpful.

Sincerely,

CONTAINER CORPORATION OF AMERICA
Fernandina Beach Mill Division

Eric J. Schmidt
Senior Technical Project Engineer

/jm
Attachment



ASSUMED
(a) 2000 TON/DAY PRODUCTION
(b) 3000 LB. B.L.S./TON PRODUCTION
(c) 14% SOLIDS FROM WASHERS
(d) 65% SOLIDS TO RECOVERY BOILERS

* EXISTING NO. 2 EVAPORATOR WILL BE RETIRED.

ATTACHMENT 2

Calculation of potential TRS emissions assuming all emissions from black liquor evaporation were from No. 6 Evaporator:

$$2000 \frac{\text{tons pulp}}{\text{day}} \times 0.5 \frac{\text{lb TRS}}{\text{ton pulp}} \times \frac{\text{day}}{24 \text{ hrs.}} = 41.7 \frac{\#\text{TRS}}{\text{HR}}$$

$$41.7 \frac{\text{lb TRS}}{\text{hr.}} \times \frac{96.0 \ \#O_2}{68.12 \ \#\text{TRS}} = 58.7 \frac{\#O_2}{\text{HR}}$$

From December 1, 1982 submission, available oxygen in No. 3 Lime Kiln is

$$5364 \frac{\text{lb. } O_2}{\text{hr.}}$$

Therefore, the amount of oxygen is

$$\frac{5364}{58.7} = 91$$

times the amount necessary to completely react with the TRS. In view of the high temperature and long retention time of gases in the kiln, it can easily incinerate all of the TRS that would be produced by black liquor evaporation.

ATTACHMENT 7

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____ Loctn.: _____		
To: _____ Loctn.: _____		
To: _____ Loctn.: _____		
From: _____ Date: _____		
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

Memo to file

TO: Container Corporation of America file: AC 45-61751

THRU: Mike Harley M.H.
Bill Thomas BT FRM

FROM: Bruce Mitchell

DATE: July 5, 1983

SUBJ: BAQM conference with Container Corporation of America (CCA) on June 3, 1983

The attached sheet of attendees met in the BAQM conference room to discuss comments (also attached) received from Mr. Eric J. Schmidt with CCA on April 25, 1983. The paragraphs have been numbered for convenience. Each paragraph will be answered (A.) in sequence and the result of the discussion per paragraph (P.) will be provided.

P.1.
A.1. No comment necessary

P.2.
A.2. The spill collection system (SCS) is an intermittent process of the total spent liquor system. When a spill occurs, there is a net loss of liquor. This material is recovered by the SCS and will be placed back into the process. Therefore, there is no net increase in black liquor due to the SCS.

P.3.
A.3. The 4,200 lbs BLS/min. to the Recovery Boilers is 63% solids, not 65%.

Production will be calculated using the current mill operation parameter of 2850 lbs BLS/Ton ADUP (air dried unbleached pulp) from the total mill evaporator sets and their associated concentrators.

The 1300 GPM from the SCS is only intermittent (see A.2.)

P.4.
A.4. The NSPS design criteria in 40 CFR 60.283(a)(1)(iii) is a design on paper. The BAQM will require a demonstration of CCA's claim to this section.

P.5.
A.5. Specific Conditions Nos. 4 and 5 will be combined to read: The total maximum input of black liquor solids (BLS) into the multiple effect evaporator sets Nos. 3, 4, 5 and 6 shall not exceed 274,089 pounds per hour (calculated at 100% BLS, dry).

P.6.,7.,8., and 9.
A.6.,7.,8., and 9. Specific Condition No. 7 will be revised to read:

The allowable emissions for all pollutants in compliance with 40 CFR 60.283(a)(1)(iii) shall be below the minimum detectable limit and within normal variability. Due to this constraint, stack mass emission tests shall be conducted on the Lime Kilns, No. 3 and No. 2, before and after start-up of the multiple effect evaporator set #6 for the pollutants PM (particulate matter), SO_2, and TRS. For TRS, the maximum emissions increase shall not exceed 5 ppm (parts per million). Stack tests for PM conducted as a requirement of the lime kilns' operating permit conditions will be acceptable as a before test requirement. Test methods shall be EPA Methods 1, 2, 3, 4, 5, or 17, 6, and 16 in accordance with the NSPS, 40 CFR 60.285, Subpart BB and as described in Appendix A of this part (EPA Method 16A may be performed upon approval from the Region IV EPA via a written request to and through the DER's Bureau of Air Quality Management (BAQM)).

At least 30 days prior to the date of compliance testing, the DER's Northeast District office and the DER's BAQM shall be notified in writing in order to witness the test(s).

The compliance tests shall be conducted at 90 to 100 percent of the permitted maximum total input of black liquor solids into the multiple effect evaporator sets Nos. 3, 4, 5, and 6. Once this Specific Condition has been satisfactorily performed and approved by the DER's BAQM, this Specific Condition will not become a part of the operating permit.

P.10.
A.10. Specific Condition No. 12 will be revised to read: An annual report, by month, of the daily product yield in air dried unbleached pulp (ADUP; based on the applicant's yield of 2850 lbs BLS/ton ADUP) from the multiple effect evaporator sets Nos. 3, 4, 5 and 6 shall be submitted by the 14th of January of each calendar year to the DER's Northest District office.

P.11.
A.11. No comment necessary.

Specific Condition No. 13 will be revised to read: The applicant will demonstrate compliance with the conditions of this construction permit and submit a complete application for an operating permit to the DER's Northeast District office prior to 90 days before the expiration date of this permit. The Certificate of Completion of Construction, DER Form 17-1.202(3), Florida Administrative Code, may be submitted in lieu of an application for a permit to operate. The applicant may continue to operate in compliance with all terms of this construction permit until its expiration date or the issuance of an operating permit.

As a result of Specific Condition Nos. 4 and 5 being combined into one, all of the Specific Conditions' numbers will be revised to read:

Nos. 4 and 5 to No. 4
No. 6 to No. 5
No. 7 to No. 6
No. 8 to No. 7
No. 9 to No. 8
No. 10 to No. 9
No. 11 to No. 10
No. 12 to No. 11
No. 13 to No. 12

RBM/bjm

6/3/83 Container Corps. of America & BAQM

Bruce Mitchell	FDER/CAPS	(904) 488-1344
Roy Cobb	CCA	(312) 580-7142
Paul Trant	CCA	(312) 260-6816
WM Kendrick	CCA	904-261-5551
Cynthia Sawyer	CCA	904-261-5551
ERK J. SCHMIDT	C.C.A.	904-261-5551
BILL THOMAS	FDER	904-488-1344
Mike Harley	FDER	904-488-1344

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:

Container Corporation
North Eighth Street
Fernandina Beach,
Florida 32034

Permit Number: AC 45-61751
Date of Issue:
Expiration Date: January 31, 1984
County: Nassau
Latitude/Longitude: 30° 40' 53" N/
81° 27' 26" W
Project: Multiple-Effect Evaporator Set #6 (set includes the multiple effect evaporators, the associated condenser(s) and hotwell(s), and a concentrator).

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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:

This permit is for the construction of the multiple-effect evaporator set #6 at the applicant's existing kraft pulp mill in Nassau County. The pollution control devices will be the existing Lime Kilns Nos. 3 and 4. The UTM coordinates are Zone 17-456.213 km East and 3394.186 km North.

Construction shall be in accordance with the permit application and plans, documents, amendments, and drawings except as otherwise noted on pages 5-7 of the "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 1.122(16).
2. C. H. Fancy's Letter of Incompleteness dated November 22, 1982.
3. Eric J. Schmidt's letter dated December 1, 1982.
4. Eric J. Schmidt's letter dated December 17, 1982.
5. Eric J. Schmidt's letter dated January 27, 1983.
6. Eric J. Schmidt's letter dated April 20, 1983.
7. Memo to file dated July 5, 1983.

PERMITTEE:

Container Corporation

I. D. Number:
Permit Number: AC 45-61751
Date of Issue:
Expiration Date: January 31, 1984

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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.

PERMITTEE:

Container Corporation

I. D. Number:
Permit Number: AC 45-61751
Date of Issue:
Expiration Date: January 31, 1984

GENERAL CONDITIONS:

6. The permittee shall at all times 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring 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 notify and provide the department with the following information:

a. a description of and cause of non-compliance; and

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

PERMITTEE:

Container Corporation

I. D. Number:
Permit Number: AC 45-61751
Date of Issue:
Expiration Date: January 31, 1984

GENERAL CONDITIONS:

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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(X) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:

Container Corporation

I. D. Number:
Permit Number: AC 45-61751
Date of Issue:
Expiration Date: January 31, 1984

GENERAL CONDITIONS:

b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) 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 submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Construction/installation should reasonably conform to the application, plans, documents, and amendments submitted for the multiple-effect evaporator system #6 (MEE #6; system includes the multiple-effect evaporators, the associated condenser(s) and hotwell(s), and a concentrator).

2. The applicant should report any delays in construction/installation and completion to the DER's Northeast District office.

3. Annual hours of operation will be 8760.

PERMITTEE:

Container Corporation

I. D. Number:
Permit/Number: AC 45-61751
Date of Issue:
Expiration Date: January 31, 1984

SPECIFIC CONDITIONS:

4. The total maximum input of black liquor solids (BLS) into the multiple effect evaporator sets Nos. 3, 4, 5 and 6 shall not exceed 274,089 pounds per hour (calculated at 100% BLS, dry).
5. Combustion temperature and retention time in the pollutant control device(s), Lime Kilns Nos. 3 and 2 (back-up device to No. 3), must be a minimum of 1200° F and 0.5 seconds respectively.

6. The allowable emissions for all pollutants in compliance with 40 CFR 60.283(a)(1)(iii) shall be below the minimum detectable limit and within normal variability. Due to this constraint, stack mass emission tests shall be conducted on the Lime kilns, No. 3 and No. 2, before and after start-up of the multiple effect evaporator set #6 for the pollutants PM (particulate matter), SO_2, and TRS. For TRS, the maximum emissions increase shall not exceed 5 ppm (parts per million). Stack tests for PM conducted as a requirement of operating permit conditions will be acceptable as a before test requirement. Test methods shall be EPA Methods 1, 2, 3, 4, 5 or 17, 6, and 16 in accordance with the NSPS, 40 CFR 60.285, Subpart BB and as described in Appendix A of this part (EPA Method 16A may be performed upon approval from the Region IV via a written request to and through the DER's Bureau of Air Quality Management (BAQM)).

   At least 30 days prior to the date of compliance testing, the DER's Northeast District office and the DER's BAQM shall be notified in writing in order to witness the test(s).

   The compliance tests shall be conducted at 90 to 100 percent of the permitted maximum total input of black liquor solids into the multiple effect evaporator sets Nos. 3, 4, 5 and 6. Once this Specific Condition has been satisfactorily performed and approved by the DER's BAQM, this Specific Condition will not become a part of the operating permit.

7. The primary pollutant control device is the Lime Kiln No. 3. The operating permit for the Lime Kiln No. 3, AO 45-10035, shall be amended to reflect its operational change by the addition of the pollutants from the multiple effect evaporator set #6; however, no additional pollutant allowable emissions from the lime kiln or its control device, an alkaline venturi scrubber, shall be permitted.

8. The back-up pollutant control device to Lime Kiln No. 3 is Lime Kiln No. 2. The operating permit for the Lime Kiln No. 2, AO 45-10034, shall be amended to reflect its operational

PERMITTEE:

Container Corporation

I. D. Number:
Permit Number: AC 45-61751
Date of Issue:
Expiration Date: January 31, 1984

SPECIFIC CONDITIONS:

change by the addition of the pollutants from the multiple effect evaporator set #6; however, no additional pollutant allowable emissions from the lime kiln or its control device, an alkaline venturi scrubber, shall be permitted.

9. A monitoring device which measures the combustion temperature at the point of incineration of effluent gases shall be installed and operated in accordance with the NSPS, 40 CFR 60.284(b)(1), Subpart BB.

10. Reports of periods of time in excess of 5 minutes and their duration during which the combustion temperature at the point of incineration is less than 1200°F must be documented and promptly reported to the DER's Northeast District office.

11. An annual report, by month, of the daily product yield in air dried unbleached pulp (ADUP; based on the applicant's yield of 2850 lbs BLS/ton ADUP) from the multiple effect evaporator sets Nos. 3, 4, 5 and 6 shall be submitted by the 14th of January of each calendar year to the DER's Northeast District office.

12. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to the DER's Northeast District office prior to 90 days of the expiration date of this permit. The Certificate of Completion of Construction, DER Form 17-1.202(3), Florida Administrative Code, may be submitted in lieu of an application for a permit to operate. The applicant may continue to operate in compliance with all terms of this construction permit until its expiration date or the issuance of an operating permit.

Issued this 7 day of July, 1983

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Terry Cole for
VICTORIA J. TSCHINKEL, Secretary

____ pages attached.

Technical Evaluation
and
Preliminary Determination

Container Corporation of America
Fernandina Beach, Florida

Application Number:
AC 45-61751

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

February 22, 1983

NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to issue a permit to the Container Corporation of America for the construction of a multiple-effect evaporator system #6 (system includes the multiple-effect evaporators, the associated condenser(s) and hotwell(s), and a concentrator) at the applicant's existing facility in Fernandina Beach, Nassau County, Florida. This permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code. A determination of Best Available Control Technology (BACT) was not required.

A person who is substantially affected by the department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The application, technical evaluation and department intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

DER Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

DER Northeast District
3426 Bills Road
Jacksonville, FL 32207

Comments on this action shall be submitted in writing to Bill Thomas of Tallahassee office within thirty (30) days of this notice.

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

(1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.

(2) All petitions filed under these rules should contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name and address of the petitioner or petitioners;

(c) All disputed issues of material fact. If there are none, the petition must so indicate;

(d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;

(e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;

(f) A demand for the relief to which the petitioner deems himself entitled; and

(g) Such other information which the petitioner contends is material.

I. PROJECT DESCRIPTION

A. Applicant

Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32304

B. Project Description and Location

The applicant intends to construct a multiple-effect evaporator system #6 (MEE #6; system includes the multiple-effect evaporators, associated condenser(s) and hotwell(s), and a concentrator) at its existing mill. The design capacity will be 1000 tons per day (TPD) of air dried pulp (ADP).

The source will be located at the above address in Nassau County. The proposed source location at Fernandina Beach is in that portion of Nassau County which is classified as the "area of influence" for the Duval County particulate nonattainment area. The UTM coordinates are Zone 17-456.213 km East 3394.186 km North.

C. Process Controls

The MEE #6 receives the weak black liquor (WBL), spent cooking liquor, washed from the pulp in the digesters. Instead of the typical input liquor content of 14% black liquor solids (BLS), this mill's operational design requires that the BLS content feed to be 23%, which is achieved by concentrating the WBL with effected and concentrated liquor from the # 6 concentrator at 67% BLS content.

The multiple-effect evaporators, condensers and hotwells evaporate the WBL at 23% solids content to a liquor concentration of 55% BLS. This liquor is then input into the associated concentrator (#6), where the liquor is concentrated to a content of 67% BLS. Removal of large amounts of water from the WBL is necessary to facilitate combustion of the dissolved organic material in the recovery boiler furnace(s).

The total process input liquor rate will be 1,031,300 pounds per hour (lbs/hr) at 23% BLS (237,200 lbs/hr at 100% BLS and 794,100 lbs/hr water). The total product liquor will be 354,000 lbs/hr at 67% BLS from the associated concentrator (237,200 lbs/hr at 100% BLS and 116,900 lbs/hr water). Therefore, the design evaporation capacity is 677,200 lbs/hr water.

Since liquor from the concentrator # 6 (67% BLS) is used to sweeten the WBL from a content of 14% BLS to 23% BLS, the actual product yield of BLS is reduced. Consequently, the yield will be 119,858 lbs/hr at 100% BLS. At 2,850 lbs BLS per ton of ADP, the daily product yield is 1009.3 TPD ADP. However, the applicant requested that the maximum rated capacity for the MEE #6 be

1000 TPD ADP (118,750 lbs/hr at 100% BLS), of which all pollutant emissions were based and calculated.

Air pollutant emissions from the MEE #6 will be vented to the existing Lime Kiln #3, the primary air pollution control device. In the case of a malfunction in Lime Kiln #3, the pollutant emissions will be vented to the existing Lime Kiln #2 as a back-up air pollution control device. The purpose of venting the air pollutant emissions from the MEE #6 to the lime kiln(s) is for incineration. The applicant intends to meet the New Source Performance Standards (NSPS), 40 CFR (Code of Federal Regulations) 60.283(a)(1)(iii), Subpart BB requirements for incineration of TRS (total reduced sulfur) in the lime kiln(s) by subjecting the TRS to a minimum temperature of 1200°F (Fahrenheit) for at least 0.5 seconds.

All of the pollutant emissions from the existing lime kilns are controlled by alkaline venturi scrubbers.

II. RULE APPLICABILITY

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes (FS) and Chapter 17-2, Florida Administrative Code (FAC).

The proposed source is to be located in an area classified as attainment for all pollutants; however, the location is within the "area of influence" of the Duval County particulate nonattainment area. The proposed source will have zero potential and allowable pollutant emissions and therefore, is exempt from the nonattainment rule, Chapter 17-2.510, FAC, because reasonable assurance has been provided that the source will not have a significant impact within the nonattainment area in accordance with Chapter 17-2.510(2)(a)2.b., FAC.

The applicant has chosen to apply the New Source Performance Standards (NSPS), 40 CFR 60.280, Subpart BB to the proposed new source. For the application of incineration of the TRS emissions in the lime kiln(s) (No. 3 Lime Kiln is the primary control device and No. 2 Lime Kiln is the back-up control device), the requirement is that the pollutant emissions be subjected to a minimum temperature of 1200° F for at least 0.5 seconds in accordance with the NSPS, 40 CFR 60.283(a)(1)(iii), Subpart BB. The net result is zero TRS emissions. For SO_2 and particulate matter (PM) emissions, the existing alkaline venturi scrubbers associated with the existing lime kilns, Nos. 3 and 2, will control these pollutants such that there will not be any increases in the allowable SO2 and PM emissions from these sources (Lime Kilns Nos. 3 and 2).

Since the proposed new source, the MEE #6, will net zero potential emissions for all pollutants, the construction will be a non-modification to an existing major facility. Therefore, a permit will be issued on the proposed new source in accordance with Chapters 17-2.210 and 17-4.03, FAC.

III. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS

A. Emission Limitations

Since all of the pollutant emissions from the proposed MEE #6 (system includes the multiple-effect evaporators, the associated condenser(s) and hotwell(s), and a concentrator) will be vented to a lime kiln(s) (No. 3 or No. 2 (back-up device)) for incineration, removal by alkaline venturi scrubbing, or both, there will not be any allowable pollutant emissions permitted.

B. Air Quality Analysis

The proposed source location at Fernandina Beach is in that portion of Nassau County which is classified as the "area of influence" for the Duval County particulate nonattainment area. An air quality analysis was not performed because the proposed source, the MEE #6, will have zero potential and allowable pollutant emissions.

IV. CONCLUSIONS

The emission limits of zero allowable emissions for all pollutants proposed by the applicant for the proposed MEE #6 are acceptable by the Department.

There is reasonable assurance that there will not be any net effect to the air quality standards of the State of Florida. In fact, the applicant indicated that the multiple-effect evaporator system # 2 will be terminated at the existing mill, which will have a decrease in TRS emissions emitted into the atmosphere.

The General and Specific Conditions listed in the proposed permit will assure compliance with all applicable requirements of Chapter 17-2, FAC.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE: Container Corporation
North Eighth Street
Fernandina Beach, Florida 32034

I.D. Number:
Permit/Certification Number: AC 45-61751
Date of Issue:
Expiration Date: January 31, 1984
County: Nassau
Latitude/Longitude: 30° 40' 53" N/81° 27' 26" W
Section/Township/Range:
Project: Multiple-Effect Evaporator System #6 (MEE #6; system includes the multiple-effect evaporators, the associated condenser(s) and hotwell(s), and a concentrator).

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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:

This permit is for the construction/installation of the multiple-effect evaporator system #6 (MEE #6) at the applicant's existing kraft pulp mill in Nassau County. The MEE #6 includes the multiple-effect evaporators, the associated condenser(s) and hotwell(s), and a concentrator. The UTM coordinates are Zone 17-456.213 km East and 3394.186 km North.

Construction shall be in accordance with the permit application and plans, documents, amendments, and drawings except as otherwise noted on page 4 of the "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 1.122(16).
2. C. H. Fancy's Letter of Incompleteness dated November 22, 1982.
3. Eric J. Schmidt's letter dated December 1, 1982.
4. Eric J. Schmidt's letter dated December 17, 1982.
5. Eric J. Schmidt's letter dated January 27, 1983.

PERMITTEE: Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

I.D. Number:
Permit/Certification Number: AC 45-61751
Date of Issue:
Expiration Date: January 31, 1984

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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 at all times 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

   a. Having access to and copying any records that must be kept under the conditions of the permit;

   b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

   c. Sampling or monitoring 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 notify and provide the department with the following information:

   a. a description of and cause of non-compliance; and

b. the period of noncompliance, including exact 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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
(X) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) 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 submitted or corrected promptly.

PERMITTEE: Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

I.D. Number:
Permit/Certification Number: AC 45-61751
Date of Issue:
Expiration Date: January 31, 1984

SPECIFIC CONDITIONS:

1. Construction/installation should reasonably conform to the application, plans, documents, and amendments submitted for the multiple-effect evaporator system #6 (MEE #6; system includes the multiple-effect evaporators, the associated condenser(s) and hotwell(s), and a concentrator).

2. The applicant should report any delays in construction/installation and completion to the DER's Northeast District office.

3. Annual hours of operation will be 8760.

4. Maximum process input liquor rate must not exceed 1,031,300 lbs per hour (lbs/hr) at 23 percent (%) black liquor solids(BLS) into the MEE #6.

5. Maximum product yield from the concentrator #6 must not exceed 118,750 lbs/hr at 100% BLS and 1000 tons per day (TPD) of air dried pulp (ADP; based on the applicant's yield of 2850 lbs BLS/ton ADP).

6. Combustion temperature and retention time in the pollutant control device(s), Lime Kilns Nos. 3 and 2 (back-up device to No. 3), must be a minimum of 1200° F and 0.5 seconds respectively.

7. The allowable emissions for all pollutants shall be below the minimum detectable limit. Due to this constraint, stack mass emission tests shall be conducted on the Lime Kilns, No. 3 and No. 2, before and after start-up of the MEE #6 for the pollutants PM (particulate matter), SO_2, and TRS. Test methods shall be EPA Methods 1, 2, 3, 4, 5 or 17, 6, and 16 in accordance with the NSPS, 40 CFR 60.285, Subpart BB and as described in Appendix A of this part. At least 30 days prior to the date of compliance testing, the DER's Northeast District office or its designee shall be notified in order to witness the test(s).

8. The primary pollutant control device is the Lime Kiln No. 3. The operating permit for the Lime Kiln No. 3, AO 45-10035, shall be amended to reflect its operational change by the addition of the pollutants from the MEE #6; however, no additional pollutant allowable emissions from the lime kiln or its control device, an alkaline venturi scrubber, shall be permitted.

9. The back-up pollutant control device to Lime Kiln No. 3 is Lime Kiln No. 2. The operating permit for the Lime Kiln No. 2, AO 45-10034, shall be amended to reflect its operational change by the addition of the pollutants from the MEE #6; however, no additional pollutant allowable emissions from the lime kiln or its control device, an alkaline venturi scrubber, shall be permitted.

10. A monitoring device which measures the combustion temperature at the point of incineration of effluent gases shall be installed and operated in accordance with the NSPS, 40 CFR 60.284(b)(1), Subpart BB.

11. Reports of periods of time in excess of 5 minutes and their duration during which the combustion temperature at the point of incineration is less than 1200°F must be documented and promptly reported to the DER's Northeast District office.

12. Records of the daily product yield in ADP (based on 2850 lbs BLS/ton ADP) from the concentrator #6 shall be kept and submitted by the 14th of January, April, July, and October of each calendar year to the DER's Northeast District office.

13. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to the DER's Northeast District office prior to 90 days of the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms.

PERMITTEE: Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

I.D. Number:
Permit/Certification Number: AC 45-61751
Date of Issue:
Expiration Date: January 31, 1984

SPECIFIC CONDITIONS:

Issued this ___ day of _____, 19____.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

_____

ATTACHMENT 1

Container Corporation of America

Paper Mill Division

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-5551

October 19, 1982

Mr. Clair Fancy
Deputy Bureau Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Building
Tallahassee, Florida 32301

Re: No. 6 Evaporator Set Permitting

Dear Mr. Fancy:

As we discussed in our meeting of June 17, 1982, we plan to construct a new evaporator set and digester at our Fernandina Beach Mill. We have received a copy of your letter to James Wilburn, U.S.E.P.A., Region IV concerning the status of the proposed digester, and in the absence of a prompt reply to your letter, we would like to submit a construction permit application for the No. 6 Evaporator Set portion of the project at this time.

As we discussed, the No. 6 Evaporator set will replace an older existing Evaporator Set No. 2, and will be controlled by incineration in an existing lime kiln. The projected total reduced sulfur emission impact from this project will be a reduction of 41.4 tons/year.

In response to your staff's questions concerning additional sulfur emissions from the lime kiln and recovery boiler, we believe that the small amount of SO_2 that could be generated in the kiln would be effectively removed by the kiln's lime based wet scrubber. The added SO_2 emissions from any anticipated increased black liquor throughout to the existing recovery boilers would only potentially impact a long term average and not in any way increase the peak emissions associated with the boilers. Air quality modeling has been performed using peak values for the recovery boilers for both short and long term averaging times. The modeling demonstrates attainment of Florida's Ambient Air Quality Standards.

A second ongoing project at the mill is construction of a coal fired boiler, which has allowed us to retire our No. 3 Recovery Boiler. As we discussed in our meeting, the T.R.S. emissions associated with the No. 3 Recovery should be "banked" to be used as possible future offsets. The estimated allowable emissions from the boiler is 65 tons/year.

We appreciate the effort your staff has made in this permitting process and should you have any further questions, please do not hesitate to call.

Sincerely,

CONTAINER CORPORATION OF AMERICA
Fernandina Beach Mill Division

Eric Schmidt
Senior Technical Project Engineer

/jm

CALCULATION SHEET #6 EVAPORATOR SET

Potential Emission Calculation:

$$1000 \frac{\text{ton}}{\text{day}} \text{ air dried pulp/day} \quad \times 1.5 \frac{\text{lb. TRS}}{\text{Ton ADP}} \times \frac{1 \text{ day}}{24 \text{ hr.}} = 62.5 \frac{\text{lbs.}}{\text{hr.}}$$

$$62.5 \frac{\text{lb.}}{\text{hr.}} \text{T.R.S.} \quad \times \frac{1 \text{ Ton}}{2000 \text{ lb.}} \times \frac{24 \text{ hr.}}{\text{Day}} \times 365 \frac{\text{Day}}{\text{Yr.}} = 274 \frac{\text{Tons}}{\text{Yr.}}$$

Efficiency: 100% efficiency*

Maximum Emission Calculation:

100% control efficiency yields zero emissions.

Actual Emission Calculation:

100% control efficiency yields zero emissions.

Total Project Emissions Impact:

	Increase	Decrease
Construct #6 Evaporator Set	0	0
Retire #2 Evaporator Set	0	227 #/day T.R.S.

Total = Reduce mills T.R.S. emissions by 227 #/day or 41.4 T/yr.

* P. xxiii Atmospheric emissions from the pulp and paper manufacturing industry E.P.A. 450/1-73-002. The emission factor for controlled T.R.S. emissions after lime kiln incineration is zero.

EVAPORATOR

AC 45-61751

DER

OCT 25 1982

BAQM

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New[1] [ ] Existing[1]

APPLICATION TYPE: [ ] Construction [ ] Operation [ ] Modification

COMPANY NAME: Container Corporation of America COUNTY: Nassau

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) Evaporator #6

SOURCE LOCATION: Street North Eighth Street City Fernandina Beach, FL

UTM: East 7 356 775.0 North 2 308 189.0

Latitude ____ ° ____ ' ____ "N Longitude ____ ° ____ ' ____ "W

APPLICANT NAME AND TITLE: Container Corporation of America

APPLICANT ADDRESS: North 8th Street, Fernandina Beach, Florida 32034

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Container Corporation of America

I certify that the statements made in this application for a [illegible] permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Max Woehle

Max Woehle, General Manager
Name and Title (Please Type)

Date: _____ Telephone No. 904/261-5551

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

(Affix Seal)

ROLAND L. ALLEN, JR. CERTIFICATE No. 7570 STATE OF FLORIDA REGISTERED ENGINEER

Signed: R L Allen Jr.

Roland L. Allen, Jr.
Name (Please Type)

Paper Industry Engineers, Inc.
Company Name (Please Type)

P. O. Box 49366, Atlanta, GA 30359
Mailing Address (Please Type)

Florida Registration No. 7570 Date: _____ Telephone No. 404/939-9002

[1]See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of a new evaporator set with off gas incineration. This construction will replace two existing evaporators and will result in a net reduction in TRS emissions.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction (1-83) Completion of Construction (4-83)

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

57,000 uninstalled estimate

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

None

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes and Chapter 22F-2, Florida Administrative Code? ____ Yes XX No

F. Normal equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ; if power plant, hrs/yr ____

if seasonal, describe: ____

G. If this is a new source or major modification, answer the following questions. (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? No
   a. If yes, has "offset" been applied?
   b. If yes, has "Lowest Achievable Emission Rate" been applied?
   c. If yes, list non-attainment pollutants.
2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. No
3. Does the State "Prevention of Significant Deterioriation" (PSD) requirements apply to this source? If yes, see Sections VI and VII. No
4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? Yes
5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? No

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Black Liquor		100%	See B1	

B. Process Rate, if applicable: (See Section V, Item 1) Design flow

1. Total Process Input Rate (lbs/hr): 1,031,300 lbs hr. B.L. at 24% solids

2. Product Weight (lbs/hr): 354,100 lbs. hr. B.L. at 65% solids

C. Airborne Contaminants Emitted:

Name of Contaminant	Emission[1]		Allowed Emission[2] Rate per Ch. 17-2, F.A.C.	Allowable[3] Emission lbs/hr	Potential Emission[4]		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
T.R.S.	0	0	5.0 PPM	N/A	62.5	274	

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles[5] Size Collected (in microns)	Basis for Efficiency (Sec. V, It[5])
Incineration in	T.R.S.	100	N/A	EP-450
Existing Lime Kiln				
#3				

[1] See Section V, Item 2.

[2] Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E. (1), F.A.C. – 0.1 pounds per million BTU heat input)

[3] Calculated from operating rate and applicable standard

[4] Emission, if source operated without control (See Section V, Item 3)

[5] If Applicable

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
None			

*Units Natural Gas, MMCF/hr; Fuel Oils, barrels/hr; Coal, lbs/hr

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating. Annual Average N/A Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack): No. 3 Lime Kiln

Stack Height: 60 ft. Stack Diameter: 4.5 ft.

Gas Flow Rate: 55392 ACFM Gas Exit Temperature: 190 °F.

Water Vapor Content: _____ % Velocity: 57.7 FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq & Gas By-prod.)	Type VI (Solid By-prod.)
Lbs/hr Incinerated							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ days/week _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner [ ] Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight — show derivation.
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.,) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, etc.).
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3, and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8½" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8½" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. An application fee of $20, unless exempted by Section 17-4.05(3), F.A.C. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?
[ ] Yes [ ] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy) [ ] Yes [ ] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:
2. Operating Principles:
3. Efficiency:*
4. Capital Costs:
5. Useful Life:
6. Operating Costs:
7. Energy:
8. Maintenance Cost:
9. Emissions:

Contaminant	Rate or Concentration

*Explain method of determining D 3 above.

10. Stack Parameters

a. Height: ft. b. Diameter: ft.

c. Flow Rate: ACFM d. Temperature: °F

e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency*: d. Capital Cost:

e. Useful Life: f. Operating Cost:

g. Energy*: h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency*: d. Capital Cost:

e. Useful Life: f. Operating Cost:

g. Energy**: h. Maintenance Costs:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

*Explain method of determining efficiency.

**Energy to be reported in units of electrical power – KWH design rate.

3.

a. Control Device:

b. Operating Principles:

c. Efficiency*: d. Capital Cost:

e. Life: f. Operating Cost:

g. Energy: h. Maintenance Cost:

*Explain method of determining efficiency above.

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space and operate within proposed levels:

4.

a. Control Device

b. Operating Principles:

c. Efficiency*:

d. Capital Cost:

e. Life:

f. Operating Cost:

g. Energy:

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency*:

3. Capital Cost:

4. Life:

5. Operating Cost:

6. Energy:

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a.

(1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

*Explain method of determining efficiency above.

(7) Emissions*:

Contaminant	Rate or Concentration

(8) Process Rate*:

b.

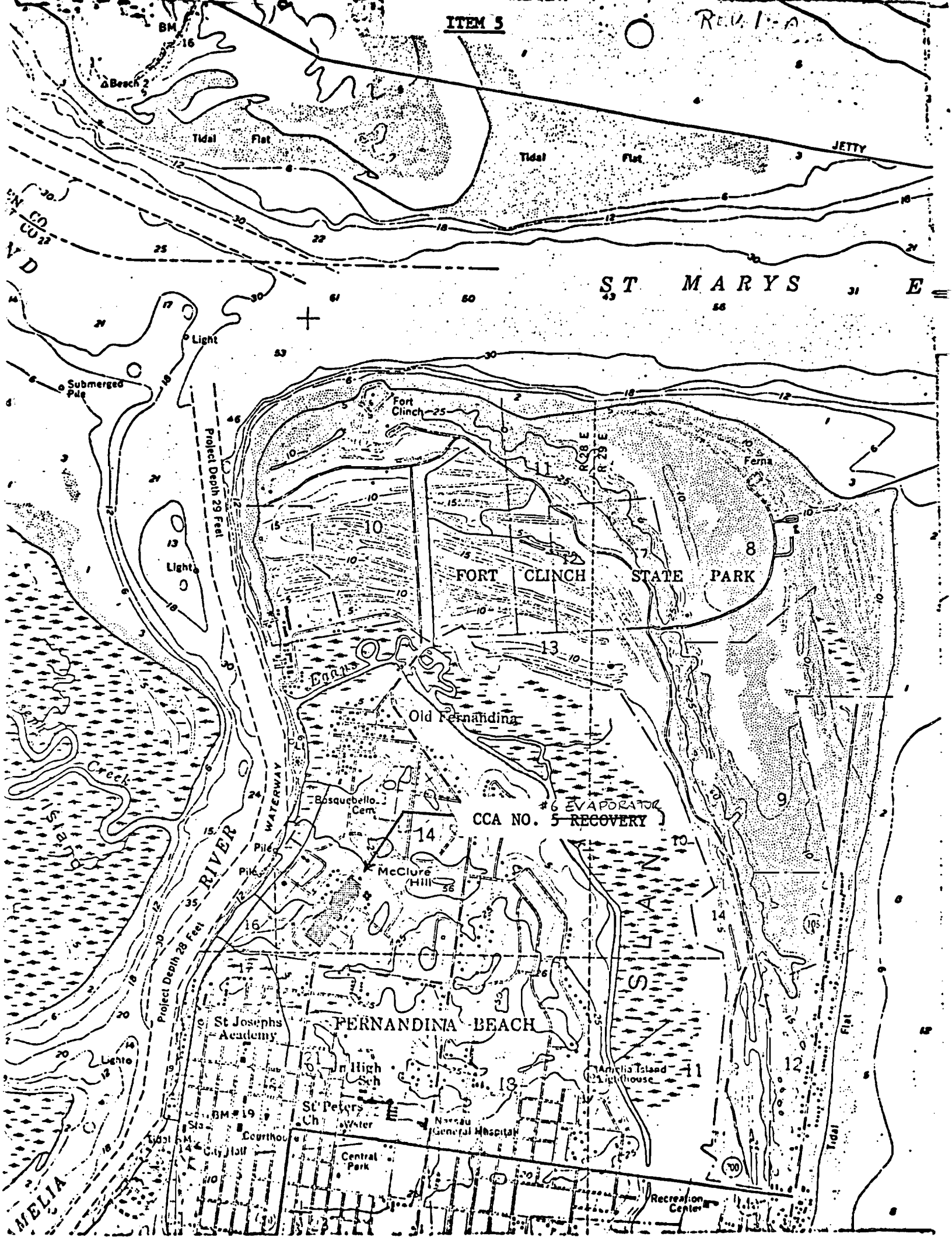
(1) Company:

(2) Mailing Address:

(3) City:

(4) State:

*Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.


ITEM 5
BM
Beach
Tidal Flat
Tidal Flat
JETTY
ST MARYS
Light
Submerged Pile
Fort Clinch
Project Depth 29 Feet
R28 E
R29 E
Ferna
FORT CLINCH STATE PARK
Light
Eagle
Old Fernandina
Creek
Island
RIVER
WATERWAY
Bosquebello Cem
#6 EVAPORATOR
CCA NO. 5 RECOVERY
Pile
Pile
McClure Hill
Project Depth 28 Feet
AMELIA ISLAND
St Josephs Academy
FERNANDINA BEACH
Lights
High Sch
Amelia Island Light House
BM 19
St Peters Ch
Water
Nassau General Hospital
Courthouse
City Hall
Central Park
Recreation Center
Tidal Flat

ATTACHMENT 2

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

November 22, 1982

Mr. Max Woehle, General Manager
Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

Re: Completeness Review for AC 45-61751 (Evaporator #6)

Dear Mr. Woehle:

The Bureau has received an application to construct an air pollution source at your existing mill in Fernandina Beach, Nassau County, Florida. As discussed by phone with Mr. Eric Schmidt on November 19, 1982, the following items were requested as points of incompleteness and shall be submitted as an amendment to the referenced construction application:

1. Submit the present volume flow through and combustion air required in the lime kiln(s) that will be receiving the emissions from the new evaporator.

2. From the additional volume of air throughput from the new evaporator, show by calculations that the residence time and temperature parameters will meet the NSPS, Subpart BB requirement to completely incinerate. The excess air required will have to be calculated and included in the new source's volume.

3. Identify the existing lime kiln(s) that will be receiving the new evaporator's emissions. What is its current operating permit number(s)?

4. What is the current total process input rate and product rate in the existing to-be-retired No. 2 evaporator set?

5. Calculate and submit the potential SO_2 emissions from the existing lime kiln that will be receiving the new evaporator's emissions. Calculate and submit the potential SO_2 emissions from the new evaporator.

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.
Deputy Bureau Chief
Bureau of Air Quality
Management

BM/bjm

cc: Eric J. Schmidt
Walter M. Kendrick
John Ketteringham
Martha H. Hall

ATTACHMENT 3

Container Corporation of America

Paper Mill Division
North Eighth Street
Fernandina Beach, Florida 32034
Phone: 904 261-5551

December 1, 1982

Bruce

Mr. C. H. Fancy
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Building
Tallahassee, FL 32301

DER
DEC 07 1982
BAQM

No. No. 6 Evaporator Permit

Dear Mr. Fancy:

This letter is written in response to your questions concerning the air pollution permit application for our No. 6 Evaporator. These responses should supply you with all of the information you requested and allow you to issue the permit shortly. Our present plans call for initial construction to begin in early Spring, 1983 and as such, the timely processing of the permit is essential.

Q1. Submit the present volume flow through and combustion air required in the lime kiln(s) that will be receiving the emissions from the new evaporator.

A. In view of the small amount of T.R.S. relative to the size of the kilns, there is ample oxygen to provide for complete combustion of the T.R.S. In an attempt to comply with your request to demonstrate this, I have performed the following calculations.

Based upon actual stack gas analyses of the No. 3 Kiln, performed over a number of years, the average gas flow is 24,000 ft^3/min. at standard conditions. The average oxygen content is 4.5%. Therefore, 24,000 ft^3/min. (standard conditions) x

$$.045 \times \frac{1.0\#\ O_2}{12.08\ ft^3} = 89.4\ \#O_2/min = 5364\ \#O_2/hr$$

Based on the estimated T.R.S. emissions of 62.5#/hr and assuming T.R.S. is H_2S, the oxygen demand can be calculated as follows:

$$2H_2S + 3O_2 \xrightarrow{Heat} 2H_2O + 2SO_2$$

using the appropriate molecular weights

$$62.5\ \#/hr\ H_2S \times \frac{96.0\ \#O_2}{68.12\ \#H_2S} = 88\ \frac{\#O_2}{HR}$$

Therefore, there is sufficient O_2 available in No. 3 Kiln to combust the T.R.S. associated with the new evaporator. A similar calculation for No. 2 Lime Kiln shows greater than 3,000 #/hr available O_2 for combustion.

Q2. From the additional volume of air throughput from the new evaporator, show by calculations that the residence time and temperature parameters will meet the NSPS, Subpart BB requirement to completely incinerate. The excess air required will have to be calculated and included in the new source's volume.

A. The NSPS requires a .5 second retention at 1,200°F. The hot end temperature of the kilns exceeds 2,000°F and as such the T.R.S. should be destroyed with only minimal retention time; but, in an effort to demonstrate this fact, I have calculated the minimum retention time by using the worst case temperature of 2,200°F over the entire length of the kiln. Again, the calculations are based on actual test data for stack gas flow rates.

No. 3 Kiln volume = 22,691 $ft.^3$

Gas flow = 24,000 SCFM

To calculate the volume that the stack gas would occupy in the kiln assume 2,200°F

$$24{,}000 \frac{Ft^3}{min} \times \frac{1{,}477°K}{294°K} = 120{,}000\ Ft.^3$$

$$\frac{22{,}691\ Ft.^3}{120{,}000\ Ft.^3/min} = .189\ min = 11.3\ seconds$$

The kiln temperature actually varies from 2,200°F at the hot end to 400°F at the cold end and as such the actual kiln retention time is greater than 11.3 seconds. A similar calculation yields a 19.8 second retention time for No. 2 Kiln.

The 1,200°F temperature is exceeded for at least one third of the total time. Therefore, the .5 second/1,200°F requirement is easily met by both kilns.

Q3. Identify the existing lime kiln(s) that will be receiving the new evaporator's emissions. What is its current operating permit number(s)?

The design of the T.R.S. control system for #6 evaporator will allow the use of either #3 or #2 lime kiln as the combustion source, #3 lime kiln will be the primary control with #2 lime kiln used as a backup.

Q4. What is the current total process input rate and product rate in the existing to-be-retired No. 2 evaporator set?

A. The #2 evaporator set is rated at 150 A.D.T./day which corresponds to an input rate of 80,000 lbs/hr black liquor at 24% solids and a product rate of 28,800 #/hr black liquor at 65% solids.

Q5. Calculate and submit the potential SO_2 emissions from the existing lime kiln that will be receiving the new evaporator's emissions. Calculate and submit the potential SO_2 emissions from the new evaporator.

A. As stated many times in the literature (see attachment), the alkaline-based scrubber used for particulate control on the lime kilns effectively removes any SO_2 associated with T.R.S. combustion or sulfur-bearing fuel oil used to fire the kiln; however, to comply with your request to estimate SO_2 emissions, I have made the following calculations:

The SO_2 emissions from #2 lime kiln:

$$30.48 \frac{gal}{hr} \times \frac{8.052\#}{gal} \times \frac{.03 \text{ lbs}}{1b \text{ oil}} \times \frac{64.0860 \text{ } SO_2}{32 \text{ lbs}} = \frac{15.6 \text{ lb} SO_2}{hr}$$

#3 Lime Kiln

$$43.57 \text{ gal/hr} \times 8.052 \frac{\#}{gal} \times \frac{.03 \text{ lbs}}{1b \text{ oil}} \times \frac{64.08 \text{ lb } SO_2}{32 \text{ lb}} = \frac{22.3 \text{ lb} SO_2}{hr}$$

The SO_2 emissions from the T.R.S. associated with the #6 evaporator:

$$2H_2S + 3O_2 \xrightarrow{Heat} 2H_2S = 2SO_2$$

Using the appropriate molecular weights, the amount of SO_2 generated by burning 62.5 #/hr of H_2S is:

$$62.5 \text{ #/hr} \times \frac{128.12 \text{ \#} SO_2}{68.12 \text{ \#} H_2S} = 117.5 \text{ #/hr } SO_2$$

The SO_2 will be effectively controlled by the scrubber on the kilns and will result in virtually zero SO_2 emissions.

Sincerely,

Eric J. Schmidt
Environmental Department
Group Leader

/ma

ATTACHMENT 4

Container Corporation of America

Paper Mill Division
North Eighth Street
Fernandina Beach, Florida 32034
Phone: 904 261-5551

December 17, 1982

File

Mr. Clair Fancy
Deputy Bureau Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Building
Tallahassee, Florida 32301

DER
DEC 22 1982
BAQM

Re: No. 6 Evaporator Set Permitting

Dear Mr. Fancy:

As a result of our meeting with your staff on December 15, 1982, I have attached a revised Page No. 3 of the permit application. Please note the change made to Section B2.

This submittal should provide the information needed to issue the construction permit. If you have any further questions, please do not hesitate to call.

Sincerely,

CONTAINER CORPORATION OF AMERICA
Fernandina Beach Mill Division

Eric J. Schmidt
Senior Technical Project Engineer

/jm
Attachments
cc: Mr. Bruce Mitchell

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Black Liquor		100%	See B1	

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 1,031,300 lbs hr. B.L. at 24% solids

2. Product Weight (lbs/hr): 237,000 lbs. hr. B.L. solids

C. Airborne Contaminants Emitted:

Name of Contaminant	Emission[1]		Allowed Emission[2] Rate per Ch. 17-2, F.A.C.	Allowable[3] Emission lbs/hr	Potential Emission[4]		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
T.R.S.	0	0	5.0 PPM	N/A	62.5	274	

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles[5] Size Collected (in microns)	Basis for Efficiency (Sec. V, It[5])
Incineration in	T.R.S.	100	N/A	EP-450
Existing Lime Kiln				
#3				

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E. (1), F.A.C. – 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard

[4]Emission, if source operated without control (See Section V, Item 3)

[5]If Applicable

ATTACHMENT 5

Container Corporation of America

Paper Mill Division

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-5551

January 27, 1983

Mr. Bruce Mitchell
Florida Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Twin Towers Building
Tallahassee, Florida 32301

DER
JAN 31 1983
BAQM

Re: No. 6 Evaporator Permit Application

Dear Mr. Mitchel:

As a result of our meeting of January 25, 1983, this letter is submitted as an amendment to our original permit application. The purpose of this amendment is to clarify the calculation of uncontrolled emissions from the evaporator set. As you suggested, the emission factor used is from AP-42. This factor was developed based on evaporators operating over a normal range of 14% input solids and 67% output solids. As we have discussed, our operation uses recycled product liquor to concentrate input liquor to around 23% solids. The following calculations demonstrate the equivalent size of the No. 6 Evaporator Set in order to obtain the rated capacity in terms of normal solids concentrations. This value can then be used to calculate uncontrolled emissions.

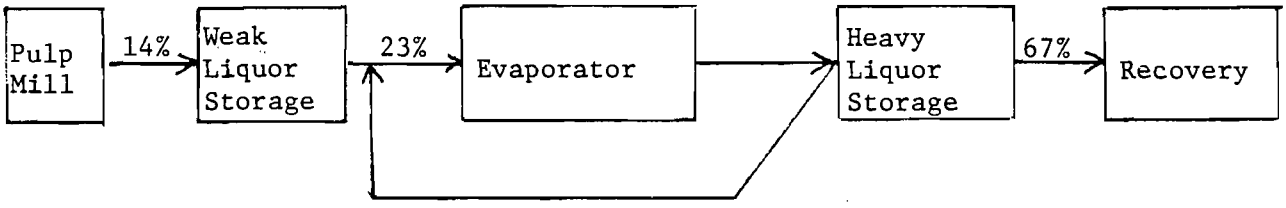
If you have any questions concerning this calculation, please feel free to call me at the number shown above.

Sincerely,

CONTAINER CORPORATION OF AMERICA
Fernandina Beach Mill Division

Eric J. Schmidt
Environmental Department Group Leader

/jm



I. EVAPORATOR DESIGN DATA

Input Liquor = 1,031,300 #/hr at 23% solids = 237,200 #/hr. solids
+794,100 #/hr. water

Product Liquor = 354,100 #/hr at 67% solids = 237,200 #/hr solids
+116,900 #/hr water

II. DESIGN EVAPORATION CAPACITY

Water input - water output = Evaporation capacity

794,100 #/hr - 116,900 #/hr = 677,200 #/hr.

III. SIZING CALCULATION

F	=	Feed to evaporator	(#/hr)
P	=	Product of evaporator	(#/hr)
W	=	Water evaporated	(#/hr)
S_F	=	Solids in feed	(#/hr)
S_P	=	Solids in product	(#/hr)

Assumed: $F = W + P$

$S_F + S_P = S$

$S_F = F(.14)$

$S_P = P(.67)$

$S_f/.14 = W + S_p/.67$

$S_f/.14 = 677{,}200\ \#/hr + S_p/.67$

$S_f/.14 - S/.67 = 677{,}200\ \#/hr$

$S(1/.14 - 1/.67) = 677{,}200\ \#/hr$

$S(7.14 - 1.49) = 677{,}200\ \#/hr$

$$S = \frac{677{,}200\ \#/hr}{5.65}$$

$S = 119{,}858\ \#/hr$

$$119{,}858\ \#/hr \text{ solids} \times 24\ hr/day \times \frac{\text{ton ADP}}{3000\ \#\ \text{solids}} = 959\ T/D$$

IV. UNCONTROLLED EMISSION CALCULATION

Assume 1,000 T/D rated capacity

$$1{,}000\ \text{ADP T/D} \times \frac{0.5\ \#\text{TRS}}{\text{Ton ADP}} \times \frac{\text{Day}}{24\ \text{hrs.}} = 20.8\ \frac{\text{lb. TRS}}{\text{hr.}}$$

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

M E M O R A N D U M

TO: Mr. R. W. Galphin, Container Corporation of America
Mr. G. Doug Dutton, St. Johns River Subdistrict

FROM: for Steve Smallwood, Chief, Bureau of Air Quality Management

DATE: January 29, 1981

SUBJ: Container Corporation of America - Application for Permit to Construct Coal/Wood-waste Boiler.

Attached is one copy of the Application, Technical Evaluation and Preliminary Determination, BACT Determination, and proposed permit to construct a coal/wood-waste boiler at Fernandina Beach, in Nassau County, Florida.

Please send any comments you wish to have considered concerning this action to Willard Hanks of the Bureau of Air Quality Management.

SS:caa

Technical Evaluation
and
Preliminary Determination

Container Corporation of America

Fernandina Beach

Nassau County, Florida

Construction Permit
Application Number:
AC 45-35532

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting
January 20, 1981

I. PROPOSED DEPARTMENT ACTION:

The Department intends to issue the requested permit to Container Corporation of America (CCA) for the construction of a coal/wood-waste boiler, capable of generating 825,000 pounds of steam per hour at 825°F and 850 psig, at the Fernandina Beach mill located on the inland side of Amelia Island, Florida. The permit will include conditions to assure compliance with Chapter 17-2, F.A.C.

Any person wanting to comment on this action may do so by submitting such comments in writing to:

Willard Hanks
Florida Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the issuance or denial of this permit may request an administrative hearing by filing a petition for hearing as set forth in Section 28-5.15, F.A.C. (copy attached). Such petition must be filed within 14 days of the date of this notice with:

Mary Clark
Florida Department of Environmental Regulation
Office of General Counsel
2600 Blair Stone Road
Tallahassee, Florida 32301

II. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS:

a. The proposed source is a major emitting facility of particulate, sulfur dioxide, nitrogen oxides, and carbon monoxide because the potential emission of each pollutant is greater than 100 tons per year. Therefore, application of Best Available Control Technology (BACT) is required for each of these pollutants.

b. The proposed source location at Fernandina Beach is in that portion of Nassau County which is classified as the "area of influence" for the Duval County particulate nonattainment area. An air quality analysis has been performed which demonstrates that, after application of BACT, particulate emissions from the source will not have a "significant" impact on the nonattainment area.

c. The air quality analysis further demonstrates that, after the application of BACT, emissions of all pollutants will neither cause nor contribute to ambient concentrations in excess of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment.

III. SYNOPSIS OF APPLICATION:

a. Name and Address of Applicant:

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

b. Description of Project:

The proposed project is a new coal/wood-waste power boiler which will replace existing power boilers No. 3 and No. 6, and recovery boiler No. 3 and its associated smelt tank. The new boiler, capable of generating 825,000 pounds of steam per hour at 825^{o}F and 850 psig, will be designed to burn either 100% coal or a mixture of up to 30% woodwaste based on heat value, which is approximately a 50/50 mixture based on fuel weights.

Auxiliary equipment includes an economizer, fans and drives, air preheater, instrumentation, breaching and duct work, and related piping to comprise a fully operational boiler installation.

The coal handling and preparation facilities, designed to deliver a nominal 41 tons of coal per hour, consist of the unloading area, storage area, preparation facility, and conveyor system.

c. Description of Process and Controls:

Particulate control equipment for the proposed power boiler consists of a multiclone collector followed by an electrostatic precipitator or equivalent control equipment. The overall design collection efficiency of the mechanical collectors will be 65% on wood waste and 35% on coal. The design efficiency of the electrostatic precipitator will be 99%.

For sulfur dioxide emission control, CCA proposes the use of Eastern (or Mid-Western) low sulfur content, bituminous coal. The sulfur content in the coal is limited to 0.75% based on a heating value of 12,500 BTU/lb, in order to meet the New Source Performance Standard (NSPS) limit of 1.2 pounds of SO_2 per million BTU generated.

To limit nitrogen oxides emissions to 0.6 lb/MMBTU, CCA proposes the use of staged combustion and low excess air techniques.

A dust supression system will be incorporated in the coal preparation and handling facilities. Coal unloading will be accomplished through a bottom discharge system employing side curtains and surfactant spray. The coal crusher will be housed in the power boiler building to minimize fugitive dust. Surfactants will be used in conjunction with the coal pile as will compaction of the pile itself to minimize fugitive dust. Conveyors to transport the coal will be covered.

IV. RULE APPLICABILITY:

The proposed source is to be located in an area classified as attainment for all pollutants; however, the location is within the "area of influence" of the Duval County particulate nonattainment area (17-2.13). The proposed source is a major source of particulate (17-2.02(6) and 17-2.17(1)(c)2.c) and therefore exempt from the nonattainment rule only if reasonable assurance is provided that the source will not have a significant impact on the nonattainment area (17-2.17(3)(a)1.a.(ii)). The proposed source is also a major emitting facility with respect to particulate, sulfur dioxide, nitrogen oxides, and carbon monoxide, and therefore subject to the PSD provisions of 17-2.04 for particulate and SO_2 emissions and to the BACT requirements of 17-2.03 for all of the above pollutant emissions.

V. FINDINGS:

1. BACT has been determined, as required by 17-2.03, for particulate matter, sulfur dioxide, and nitrogen oxides from the proposed boiler and the coal preparation and handling systems. A copy of this determination is attached. The BACT emission limits are as follows:

Pollutant	Maximum Emission Limit
Particulate Matter	0.1 lb/MMBTU input
Sulfur Dioxide	1.2 lb/MMBTU input
Nitrogen Oxides	0.6 lb/MMBTU input
Opacity	Not to exceed 20%

2. After application of BACT, total maximum emissions are projected to be equal to or less than the amounts shown in the following table:

Source	Particulate		Sulfur Dioxide		Nitrogen Oxides	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler	102.1	429	1,225	5,142	612	2,570
Coal Handling System		7.2				

3. Dispersion modeling for particulate emissions indicates that after application of BACT emissions from the proposed source will have no significant impact on the Duval County particulate nonattainment area.

4. The proposal in this application includes retiring the No. 6 power boiler, the No. 3 recovery boiler and its associated smelt tank, and placing No. 3 power boiler on "cold" standby.

5. Dispersion modeling for particulate and SO_2 emissions indicates that after application of BACT and shut-down of other sources as detailed above, emissions from the proposed source will neither cause nor contribute to ambient concentrations in excess of any ambient air quality standard or PSD increment.

6. The boiler will operate 8,400 hours per year, with a maximum capacity of approximately 825,000 pounds of steam per hour.

7. Fuel oil with 2.5% maximum sulfur content will be used for start-ups and emergencies.

VI. PROPOSED ALLOWABLE EMISSIONS AND PERMIT CONDITIONS:

See Draft Permit.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: District, Subdistrict and Local Program Air Engineers

FROM: Ed Palagyi, BACT Coordinator

DATE: December 31, 1980

SUBJ: BACT as determined for Container Corporation of America, Fernandina Beach, Nassau County, Florida for construction of a boiler.

Attached please find one copy of the BACT as determined by the Florida Department of Environmental Regulation, for the subject plant.

Should you have any questions regarding this determination, please contact me at (904) 488-1344 or Suncom 278-1344.

EP:caa

Best Available Control Technology (BACT) Determination

Container Corporation of America

Fernandina Beach, Florida

Nassau, County

The proposed project is the construction of a 1000 MMBTU/hr. solid fossil-fuel fired steam generator, including coal handling facilities.

BACT Determination Requested by the Applicant:

Pollutant	Emission Limits
Particulates	0.10 lb./10^6 BTU input
Sulfur Dioxide	1.2 lb./10^6 BTU input
Nitrogen Oxides	0.6 lb./10^6 BTU input
Fugitive Dust	7.2 tons per year

Date of Receipt of a Complete BACT Application:

December 12, 1980

Date of Publication in the Florida Administrative Weekly:

December 19, 1980

Review Group:

Teresa Heron, FDER, BAQM
Bob King, FDER, BAQM
Johnny Cole, FDER, St. Johns River Subdistrict

Study Group Emission Limit Recommendation:

Pollutant	Teresa Heron	Bob King	Johnny Cole
(lbs./10^6 BTU)			
Particulates	0.1	0.09	0.1
SO_2	1.2	1.2	1.2
NO_x	0.7	0.6	0.6

The study group recommended shrouds, covered conveyors and hoods vented into a fabric baghouse dust collector to control fugitive emissions. The use of low sulfur content coal and use of chemical wetting agents to control storage pile emissions was also recommended.

BACT Determination by Florida Department of Environmental Regulation:

Pollutant	Maximum Emission Limit
Particulates	0.1 lb./Million BTU input
Sulfur Dioxide	1.2 lb./Million BTU input
Nitrogen Oxides	0.6 lb./Million BTU input
Opacity	Not to exceed 20%

Emissions to be measured by EPA's Reference Methods 1, 2, 3, 4, 5, 6, 7, & 9.

Justification of Florida Department of Environmental Regulation Determination:

The recommended emission limits are as stringent as EPA's Standards of Performance for New Stationary Sources and are attainable with the applicants proposed control technology.

Details of the Analysis May Be Obtained by Contacting:

Edward Palagyi, BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Recommended by:

for Lawrence A. George
Steve Smallwood, Chief, Bureau of
Air Quality Management

Date: December 29, 1980

Approved by: Jacob D. Varn
Jacob D. Varn,
Secretary

Date: 30 December 1980

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

PERMIT/CERTIFICATION
NO. AC 45-35532

COUNTY: Nassau

PROJECT: Coal/Wood Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a coal/wood waste boiler, capable of generating 825,000 pounds of steam per hour at 825°F and 850 psig, controlled by a multiclone collector and an electrostatic precipitator (or equivalent control equipment) at an existing plant located on the inland side of Amelia Island, in Nassau County, Florida. The UTM Coordinates of the proposed plant are 456.213 E and 3394.186 N.

Construction shall be in accordance with the attached permit application, and plans, documents and drawings except as otherwise noted on pages 3 and 4, "Specific Conditions".

1. Application to Construct Air Pollution Sources, DER Form 17-2.122(16).
2. Container Corporation of America, Responses to Technical Discrepancies, December 12, 1980.
3. Stack sampling drawing.

PERMIT NO.: AC 45-35532
APPLICANT: Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions:, and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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

3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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 revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, 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.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalities therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.

13. This permit also constitutes:

[X] Determination of Best Available Control Technology (BACT)
[X] Determination of Prevention of Significant Deterioration (PSD)
[ ] Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 45-44532
APPLICANT: Container Corporation of America

SPECIFIC CONDITIONS:

1. Construction shall reasonably conform to the plans and schedule given in the application. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.

2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the source.

3. Based on New Source Performance Standard 40 CFR 60.45, as referenced by 17-2.21(2)(a), the applicant shall install, calibrate, maintain and operate continuous monitoring systems for measuring the opacity of emissions, sulfur dioxide emissions, nitrogen oxides emissions, and either oxygen or carbon dioxide.

4. Before the construction permit expires, the proposed boiler will be sampled for pollutant emissions. Test procedures will be EPA reference methods 1,2,3,5,6,7, and 9 as described in 40 CFR 60, Appendix A or other state approved methods.

5. Stack sampling facilities will include the eyebolts and angle described in the attached figures.

6. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to St. Johns River Subdistrict Office prior to 90 days before the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or until issuance of an operating permit.

7. Upon obtaining an operating permit, the applicant will be required to submit periodic reports on the actual operation and emissions of the source. These reports will give emission test data, emission test results, scrubber parameters (pressure drop and water flow, pH), fuel composition and amount of steam produced.

8. Fuel oil may be used for start-ups, shut-down, and stand-by when coal is not available. The oil will have a maximum sulfur content of 2.5%.

9. Coal fuel is limited to a maximum of 0.75% sulfur.

PERMIT NO.: AC 45-33532
APPLICANT: Container Corporation of America

Specific Conditions (Con't)

10. Maximum emission limits are:

Pollutant	lb/MMBTU	lb/hr
Particulate	0.1	102
SO_2	1.2	1,225
NO_x	0.6	612
Opacity	20% except 27% for one 6 minute period per hour.	

11. The maximum hours of operation shall be 8,400 hours per year.

12. As soon as the applicant submits an operating permit application for this boiler, the No. 3 recovery boiler and its associated smelt tank, and the No. 6 power boiler will be retired, and the No. 3 power boiler will be put on "cold" stand-by. The Department will be notified whenever the No. 3 power boiler is placed into operation.

Jacob D. Varn,
Secretary

Expiration Date: January, 1983

Issued this _____ day of _____, 19____.

_____ Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

_____
Signature

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

(1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.

(2) All petitions filed under these rules should contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name and address of the petitioner or petitioners;

(c) All disputed issues of material fact. If there are none, the petition must so indicate;

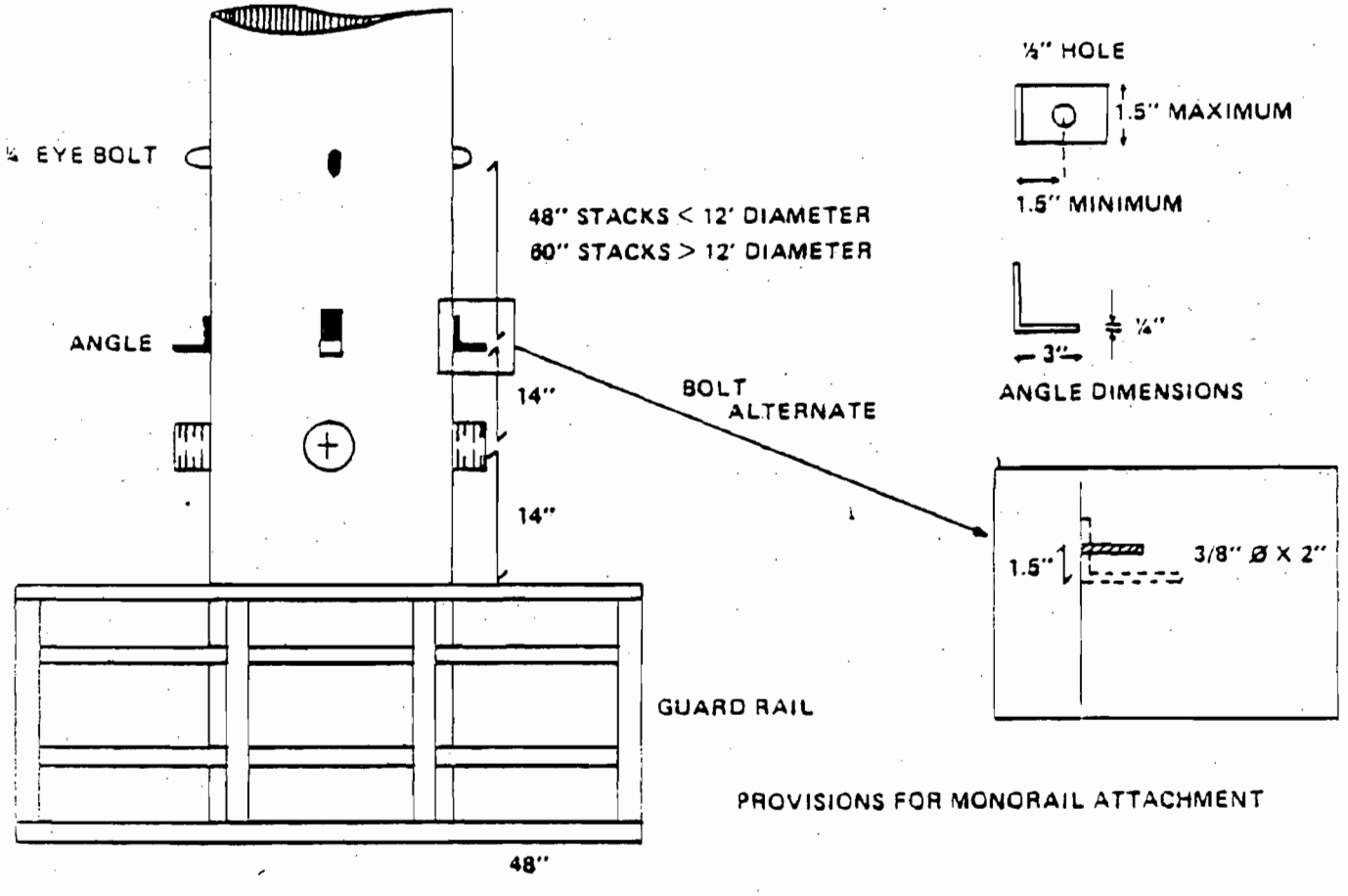
(d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;

(e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;

(f) A demand for the relief to which the petitioner deems himself entitled; and

(g) Such other information which the petitioner contends is material.

AN EYEBOLT AND ANGLE SHALL BE ATTACHED DIRECTLY ABOVE EACH PORT OF VERTICAL STACKS AND ABOVE EACH VERTICAL SET OF PORTS FOUND ON THE SIDES OF HORIZONTAL DUCTWORK 1.8 WORKING PLATFORMS. THE DIMENSIONS AND PLACEMENT OF THESE FIXTURES ARE SHOWN IN FIGURE 1-1.



PROVISIONS FOR MONORAIL ATTACHMENT

IF EYEBOLT IS MORE THAN 120 INCHES ABOVE THE PLATFORM A PIECE OF CHAIN SHOULD BE ATTACHED TO IT TO BRING THE POINT OF ATTACHMENT WITHIN SAFE REACH. THE EYEBOLT SHOULD BE CAPABLE OF SUPPORTING A 500 POUND WORKING LOAD.

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

Container Permit file
(Bob King)

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

November 6, 1980

Mr. R.W. Galphin
General Manager
Container Corporation of
America
Fernandina Beach Mill Division
North Eight Street
Fernandina Beach, Florida 32034

Dear Mr. Galphin:

The Department has received your application for a permit to construct a new coal/wood waste boiler in Nassau County, Florida. Based on the initial review of your proposal, it has been determined that additional inforamtion is needed before we can process the application. The information required to complete the application is described below.

1. If the application includes coal preparation and handling facilities what are the potential and actual emission rates from the coal preparation and handling facilities?

2. What kind of fuel oil will be used for start ups and emergencies? Give analysis information for the fuel oil.

As soon as we receive the requested information, we will begin processing your application. If you have any questions on the data requested, please call Bob King at (904) 488-1344.

Sincerely,

for Steve Smallwood, Chief
Bureau of Air Quality Management

SS:dav

Container Corporation of America

Paper Mill Division
North Eighth Street
Fernandina Beach, Florida 32034
Phone: 904 261-5551

December 10, 1980

Mr. Steve Smallwood, Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Smallwood:

In response to your letter of November 6, 1980, emission estimates for our proposed coal handling facility have been calculated and appear on the next page. A typical analysis of oil similar to that which we intend to burn in the new power boiler is included in this transmittal as attachment #1.

Our current plans for a coal handling and delivery system include ten conveyor belt components and the associated transfer points, a secondary coal crusher and two storage silos. Emission rates (see attachment #2) have been estimated using factors developed in EPA-450/3-77-010 "Technical Guidance For Control Of Industrial Process Fugitive Particulate Emissions" March 1977 and "Particulate Emission Factors Applicable To The Iron And Steel Industry" draft report April 5, 1979 prepared for U. S. EPA by Midwest Research Institute. Coal throughout is based on average annual consumption.

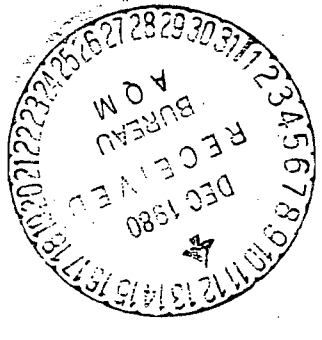
If you have any questions, please don't hesitate to call.

Sincerely,

CONTAINER CORPORATION OF AMERICA
Fernandina Beach Mill Division

W. M. Kendrick,
Technical Director

/bn



ATTACHMENT #1

TYPICAL OIL ANALYSIS

VANADIUM, ppm	110
SODIUM, ppm	7.0
MAGNESIUM, ppm	1.4
ASH %	0.03
SULFUR %	2.5
BTU'S/LB.	18,800.0
SP GRAVITY AT 60°F	0.954
NITROGEN, %N	0.2

ATTACHMENT #2

ESTIMATED EMISSION RATES

PROCESS	EMISSION CATEGORY	UNCONTROLLED EMISSION (LB/T MATERIAL HANDLING)	TOTAL NUMBER PROCESSES	TYPE CONTROL	EFF. %	UNCONTROLLED EMISSIONS T/YR*	CONTROLLED EMISSIONS T/YR**
CONVEYOR/ TRANSFER	A	.0003	10	NONE	0	0.5	
CONVEYOR/ TRANSFER	B	.0003	10	SURFACTANT SPRAY	73		0.1
CRUSHER	A	.16	1	NONE	0	26.4	
CRUSHER	B	.16	1	SURFACTANT SPRAY	73		7.1
COAL PILE	A	.14	1	NONE	0	23.1	
SILO	B	-	2	ENCLOSED	-		NEG
RAIL CAR UNLOAD	A	.00002	1	NONE	-	.003	
RAIL CAR UNLOAD	B	.00002	1	SURFACTANT SPRAY	73		.001
					TOTAL	50.0 T/YR	7.2 T/YR

A = UNCONTROLLED

B = CONTROLLED

* ASSUMES 330,000 TON ANNUAL COAL THROUGHOUT

** INCLUDES LOAD IN, LOAD OUT, STORAGE PILE MAINTENANCE AND TRAFFIC, AND WIND EROSION.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Victoria J. Tschinkel, Secretary, FDER

FROM: for Steve Smallwood, Chief, BAQM

DATE: March 10, 1981

SUBJ: Approval and Signature - Container Corporation of America, Air Construction Permit AC 45-35532

Attached please find one Air Construction Permit for which the applicant is Container Corporation of America. The proposed construction is a new coal/wood-waste boiler with coal preparation and handling facilities to be located in Nassau County, Florida.

Day 90, after which the permit would be issued by default is March 12, 1981.

The Bureau recommends your approval and signature.

SS:dav

Final Determination

Container Corporation of America

Fernandina Beach

Nassau County, Florida

Construction Permit

Application Number:

AC 45-35532

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

March 9, 1981

Final Determination

Container Corporation of America's (CCA) application for a permit to construct a coal/wood-waste boiler at an existing site located on the island side of Amelia Island in Nassau County, Florida has been reviewed by the Bureau of Air Quality Management. Public notice of the Department's Intent to Issue the construction permit was published in the Jacksonville's Florida Times-Union on February 2, 1981.

Copies of the preliminary determination have been made available for public inspection at the Department's St. Johns River Subdistrict Office in Jacksonville and the Department's Bureau of Air Quality Management in Tallahassee.

The only comments received on the proposed construction permit were from CCA, the applicant. Their comments pertained to: (1) Permit Specific Condition No. 1 - reporting of construction delays; (2) Permit Specific Condition No. 3 - continuous monitoring requirements; (3) Permit Specific Condition No. 9 - sulfur content limit of the coal; (4) Permit Specific Condition No. 11 - shutdown date of existing boilers for offset purposes; and (5) the expiration date of the construction permit.

CCA felt that reporting of delays should be required only if the delays would extend completion beyond the expiration date of the construction permit. The Department is in agreement with CCA on this matter and believes Specific Condition No. 1 implies this. For this reason, the Department has chosen not the change the Condition No. 1.

CCA noted that some of the continuous emission monitoring systems required in Specific Condition No. 3 can be waived as provided in 40 CFR Section 60.45(b). The Department agrees with CCA on this matter.

CCA requested that the limitation on sulfur content in the coal be waived. If the request is not acceptable, CCA asked that this limitation take into account both the heating value of the coal and the sulfur retained in the flyash. The Department has chosen not to waive the limitation on sulfur content in the coal because CCA proposed the use of low sulfur coal as BACT for sulfur dioxide emission control. The Department will allow credit for sulfur compounds retained in the flyash and for the heating value of the coal in determining the maximum allowable sulfur in the coal.

CCA requested that the existing boilers used for offset purposes be allowed to operate for a limited time after the new boiler commences operation. Compliance with Condition No. 5 would require the new boiler to be in a fully operational status. The technical evaluation relied on shutdown of the existing boilers to provide emission credits for the new boiler. For this reason, the Department has chosen not to change Condition No. 11.

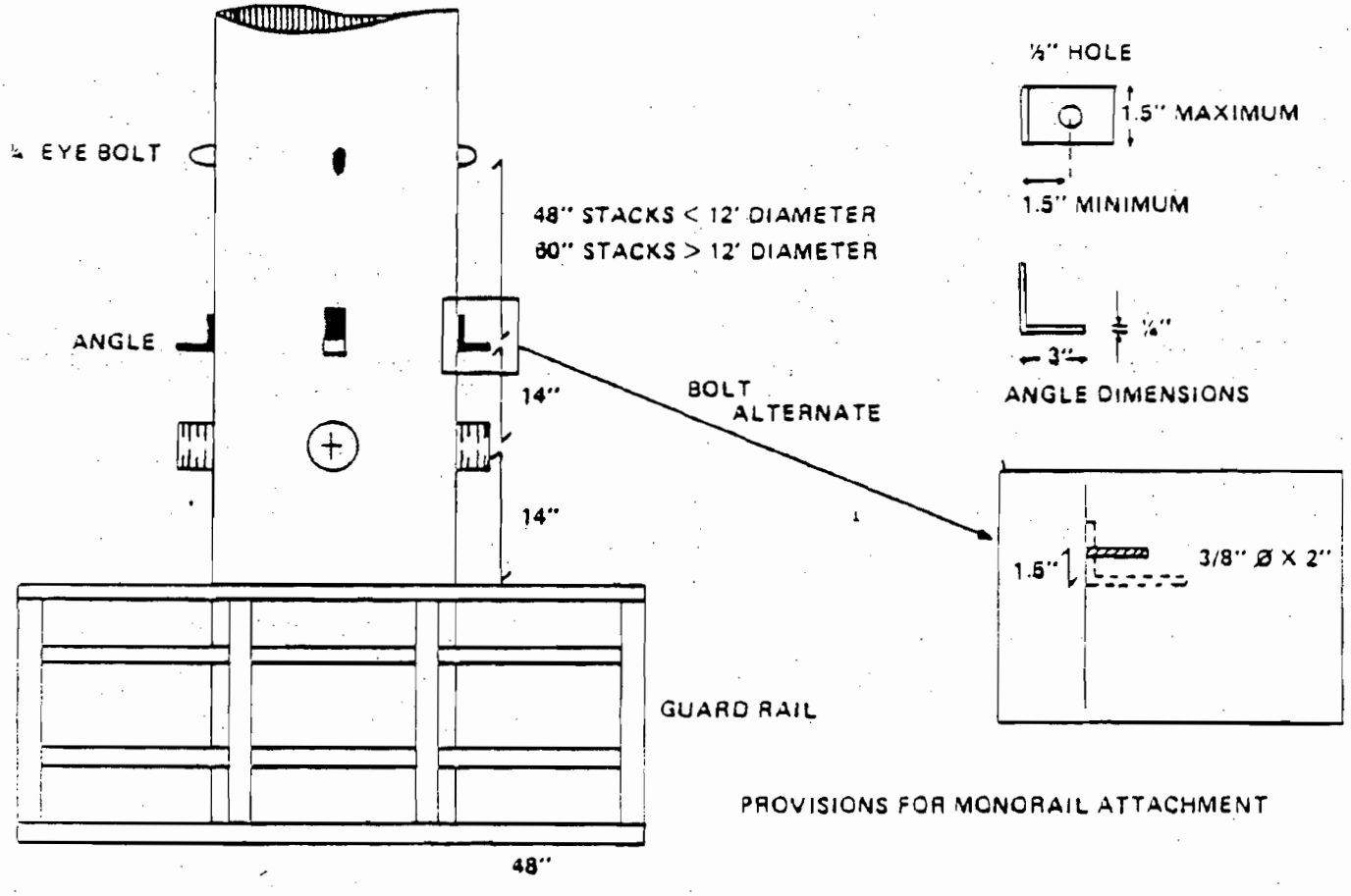
CCA requested that the expiration date for the construction permit be changed from January, 1983 to September 30, 1983 to allow time to bring the new boiler on stream and make the emission compliance test within the time frame established on the construction permit. The Department believes this request is reasonable and has adjusted the expiration date of the construction permit.

The requirements for dust control of the coal preparation and handling facilities which were discussed in the technical evaluation, have been added to the specific conditions.

Several minor changes to other specific conditions were made to clarify the Department's intent.

The final action by the Department will be to issue the permit with the changes noted above.

AN EYEBOLT AND ANGLE SHALL BE ATTACHED DIRECTLY ABOVE EACH PORT OF VERTICAL STACKS AND ABOVE EACH VERTICAL SET OF PORTS FOUND ON THE SIDES OF HORIZONTAL DUCTWORK 1.8 WORKING PLATFORMS. THE DIMENSIONS AND PLACEMENT OF THESE FIXTURES ARE SHOWN IN FIGURE 1-1.



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STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AC 45-35532

CONTAINER CORPORATION OF
AMERICA

DATE OF ISSUANCE

March 17, 1981

DATE OF EXPIRATION

SEPTEMBER 30, 1983

VICTORIA J. TSCHINKEL,
SECRETARY

DER FORM PERM 11-42

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAH
GOVERN

JACOB D. V
SECRETA

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

PERMIT/CERTIFICATION
NO. AC 45-35532

COUNTY: Nassau

PROJECT: Coal/Wood Boil

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a coal/wood waste boiler, capable of generating 825,000 pounds of steam per hour at 825°F and 850 psig, controlled by a multiclone collector and an electrostatic precipitator (or equivalent control equipment) at an existing plant located on the inland side of Amelia Island, in Nassau County, Florida. The UTM Coordinates of the proposed plant are 456.213E and 3394.186N.

Construction shall be in accordance with the attached permit application, and plans, documents and drawings except as otherwise noted on pages 3 and 4, "Specific Conditions".

Attachments:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16).

2. Container Corporation of America, Responses to Technical Discrepancies, December 12, 1980.

3. Stack sampling drawing.

PERMIT NO.: AC 45-35532
APPLICANT: Container Corporation of America

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions:, and as such are bi ing upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby pl on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit C ditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unau rized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for rev tion and enforcement action by the department.

3. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specifie this permit, the permittee shall immediately notify and provide the department with the following information: (a) a description and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the an pated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the n compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement actio the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or an clusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infri ment of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construc or operation.

6. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information lating to the construction or operation of this permitted source, which are submitted to the department, may be used by the dep ment as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is prescri by Section 403.111, F.S.

7. In the case of an operation permit, permittee agrees to comply with changes in department rules and Florida Statutes aft reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or partment rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aqu life or property and penalities therefore caused by the construction or operation of this permitted source, nor does it allow the mittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an o from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The perm shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by partment personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspect the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not con tute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have b obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

[X] Determination of Best Available Control Technology (BACT)
[X] Determination of Prevention of Significant Deterioration (PSD)
[ ] Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 45-44532
APPLICANT: Container Corporation of America

SPECIFIC CONDITIONS:

1. Construction shall reasonably conform to the plans and schedule given in the application. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.

2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the source.

3. Based on the New Source Performance Standard, 40 CFR 60.45 (a) and (b), as referenced by 17-2.21(2)(a), the applicant shall install, calibrate, maintain and operate continuous monitoring systems for measuring the opacity of emissions, nitrogen oxides emissions, and either oxygen or carbon dioxide except as provided in 40 CFR 60.45(b).

4. Before the construction permit expires, the proposed boiler will be sampled for pollutant emissions. Test procedures will be EPA reference methods 1, 2, 3, 5, 6, 7, and 9 as in 40 CFR 60, Appendix A or other state approved methods. Minimum sampling time and volume will be as specified in new source performance standard for this type of source. Stack sampling facilities will include the eyebolts and angle described in the attached figures.

5. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to St. Johns River Subdistrict Office prior to 90 days before the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or until issuance of an operating permit.

6. Upon obtaining an operating permit, the applicant will be required to submit periodic reports on the actual operation and emissions of the source. These reports will give emissions test data, emission test results, scrubber parameters (pressure drop and water flow, pH), fuel composition and amount of steam produced.

7. Fuel oil may be used for start-ups, shut-down, and stand-by when coal is not available. The oil will have a maximum sulfur content of 2.5%.

PERMIT NO.:
APPLICANT:

8. Coal fuel is limited to a maximum sulfur content calculated from the following formula:

   Maximum allowable sulfur, per cent. = $6.32 \times 10^{-5} \times$ (BTU per lb coal)

9. Maximum emission limits are:

Pollutant	lb/MMBTU	lb/hr
Particulate	0.1	102
SO_2	1.2	1,225
NO_x	0.6	612
Opacity	20% except 27% for one 6 minute period per hour.	

10. The maximum hours of operation shall be 8,400 hours per year.

11. As soon as the applicant submits an operating permit application for this boiler, the No. 3 recovery boiler and its associated smelt tank, and the No. 6 power boiler will be retired, and the No. 3 power boiler will be put on "cold" stand-by. The No. 3 power boiler will not be operated while the new boiler is in operation any time afte the application for a permit to operate the new boiler is submitted to the Department.

12. Dust supression systems shall be incorporated in the coal preparation and handling facilities. The system will include: (a) a bottom discharge system empolying side curtains and surfactant spray for coal unloading operations; (b) housing the coal crusher in the power boiler building; (c) surfactants control in conjunction with the coal pile; and (d) covered conveyors to transport the coal.

Expiration Date: September 30, 1983

Issued this 12 day of March, 1981

_____ Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Signature