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BUREAU OF AIR REGULATION

AIR PERMIT APPLICATION
FOR
RENEWAL OF TITLE V PERMIT

JEFFERSON SMURFIT CORPORATION (U.S.)
FERNANDINA MILL

RECEIVED

DEC. 18 2002

STATE OF FLORIDA
DEPT. OF ENV. PROTECTION
NORTHEAST DISTRICT-JAX

Prepared For:

Jefferson Smurfit Corporation (U.S.)
North 8th Street
Fernandina Beach, Florida 32034

Prepared By:

Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500

December 2002
0237609

0896003

ASD 03A

DISTRIBUTION:

4 Copies - FDEP

1 Copy - Jefferson Smurfit

1 Copy - Golder Associates Inc.

**AIR PERMIT APPLICATION
FOR
RENEWAL OF TITLE V PERMIT**

**JEFFERSON SMURFIT CORPORATION (U.S.)
FERNANDINA MILL**

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Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Jefferson Smurfit Corporation (U.S.)	
2. Site Name: Fernandina Mill	
3. Facility Identification Number: 0890003 [] Unknown	
4. Facility Location: Street Address or Other Locator: North 8th Street City: Fernandina Beach County: Nassau Zip Code: 32034	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Bill Crews, Environmental Manager	
2. Application Contact Mailing Address: Organization/Firm: Jefferson Smurfit Corp. (U.S.) Street Address: North 8th Street City: Fernandina Beach State: FL Zip Code: 32034	
3. Application Contact Telephone Numbers: Telephone: (904) 277 - 7746 Fax: (904) 277 - 5888	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

[] Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

[] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

[] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

[X] Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: **Permit No. 0890003-001-AV**

Reason for revision: **Title V Permit Renewal**

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[] Air construction permit to construct or modify one or more emissions units.

[] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

[] Air construction permit for one or more existing, but unpermitted, emissions units.

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [X], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

David A. Buff
Signature

12/16/02
Date

*Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
006	No. 5 Power Boiler		
007	No. 4 Recovery Boiler		
011	No. 5 Recovery Boiler		
013	No. 4 Smelt Dissolving Tank		
014	No. 5 Smelt Dissolving Tank		
015	No. 7 Power Boiler		
020	Tall Oil Plant		
021	No. 4 Lime Kiln		
024	Brownstock Washer – C-Line		
025	Woodyard		
026	Brownstock Washing		
028	Chemical Recovery Area		
029	Converting/Warehouse		
030	Facility-wide Miscellaneous		
031	Secondary Fiber Pulping		
032	Papermaking		
033	Pulping System-MACT I		
	Package Boiler		

Application Processing Fee

Check one: [] Attached - Amount: \$: _____ [X] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

2. Projected or Actual Date of Commencement of Construction

3. Projected Date of Completion of Construction:

Application Comment

This application is for renewal of Title V Permit No. 0890003-001-AV for the Fernandina Beach mill.

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
PM	A				Particulate Matter – Total
PM ₁₀	A				Particulate Matter – PM ₁₀
SO ₂	A				Sulfur Dioxide
NO _x	A				Nitrogen Oxides
CO	A				Carbon Monoxide
VOC	A				Volatile Organic Compounds
SAM	A				Sulfuric Acid Mist
TRS	B				Total Reduced Sulfur
HAPS	A				Total Hazardous Air Pollutants
H001	A				Acetaldehyde
H095	A				Formaldehyde
H106	A				Hydrochloric Acid
H107	A				Hydrogen Fluoride
H115	A				Methanol
H120	A				Methyl Ethyl Ketone
H174	A				1,2,4-Trichlorobenzene

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-FI-C8</u> <input type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-FI-C9</u> <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-FI-C10</u> <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-FI-C12</u> <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input checked="" type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: <u>JSF-FI-C13</u>) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-FI-C14</u> <input type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-FI-C15</u> <input type="checkbox"/> Not Applicable

ATTACHMENT JSF-FI-A7

FACILITY COMMENT

ATTACHMENT JSF-FI-A7**FACILITY COMMENT**

The JSC Fernandina Beach Mill is a fully integrated kraft linerboard mill. The mill produces many different grades of linerboard on three paper machines. The linerboard is then sold to customers for converting into corrugated containers. The mill employs more than 600 people onsite and has the capability to produce approximately 3,900 tons of linerboard daily. A JSC container plant, commonly referred to as the Boxplant, operates on site converting linerboard into corrugated containers.

Major areas of the mill include:

- Woodyard, which supplies wood chips and bark to the mill from logs and purchased chips;
- Pulp Mill, which processes wood chips into pulp;
- Recycle Plant, which converts old corrugated containers into pulp;
- Chemical Recovery, which recovers chemicals from the pulping process for reuse;
- Power House, which supplies steam and electricity to the mill; and
- Paper Mill, which produces the rolls of linerboard.

ATTACHMENT JSF-FI-C1

AREA MAP



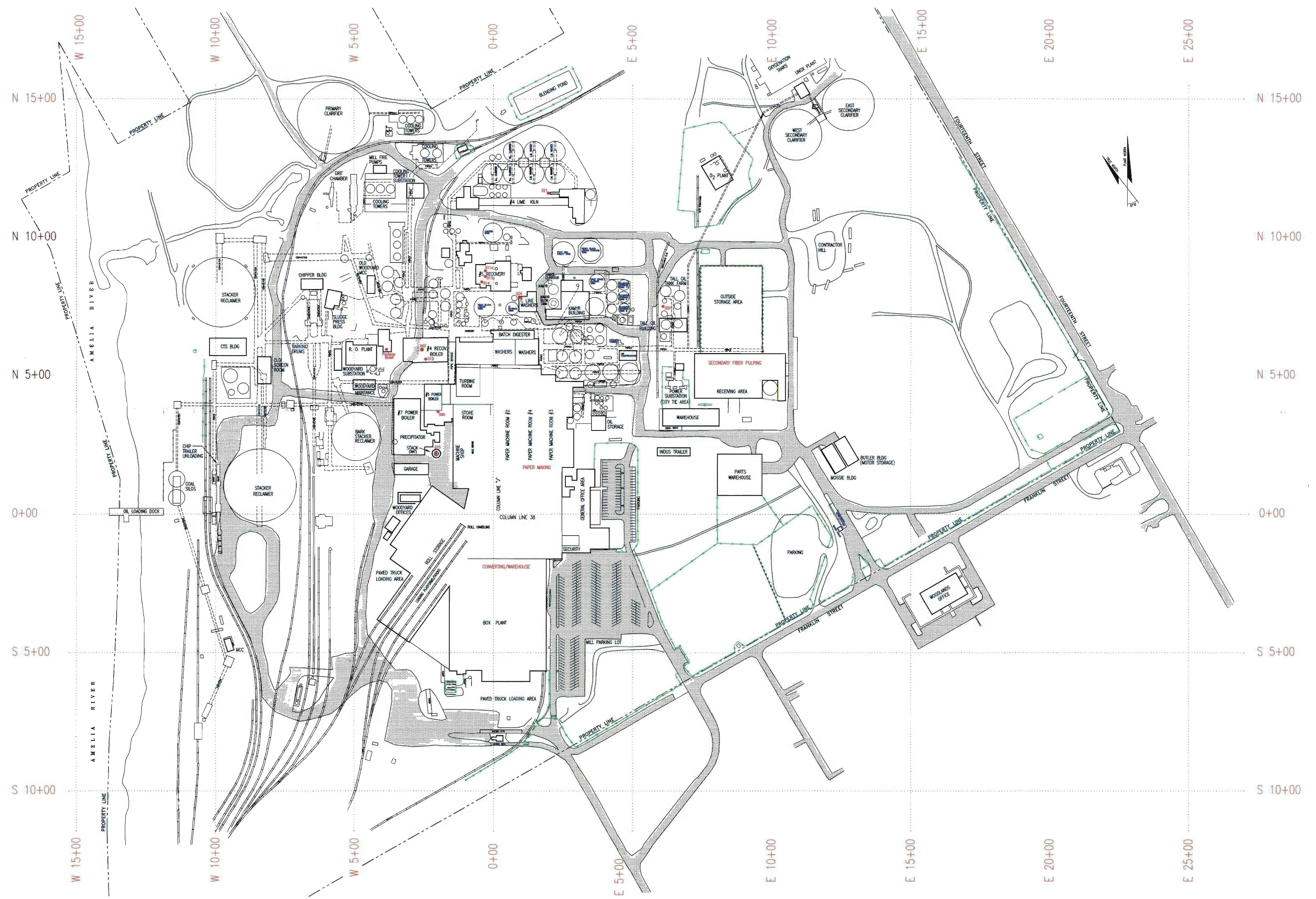
Figure JSF-F1-C1
 Jefferson Smurfit Corporation
 Fernandina Beach, Florida

Source: Golder, 2002.



ATTACHMENT JSF-FI-C2


FACILITY PLOT PLAN



SCALE: 1" = 150'

0890003-005

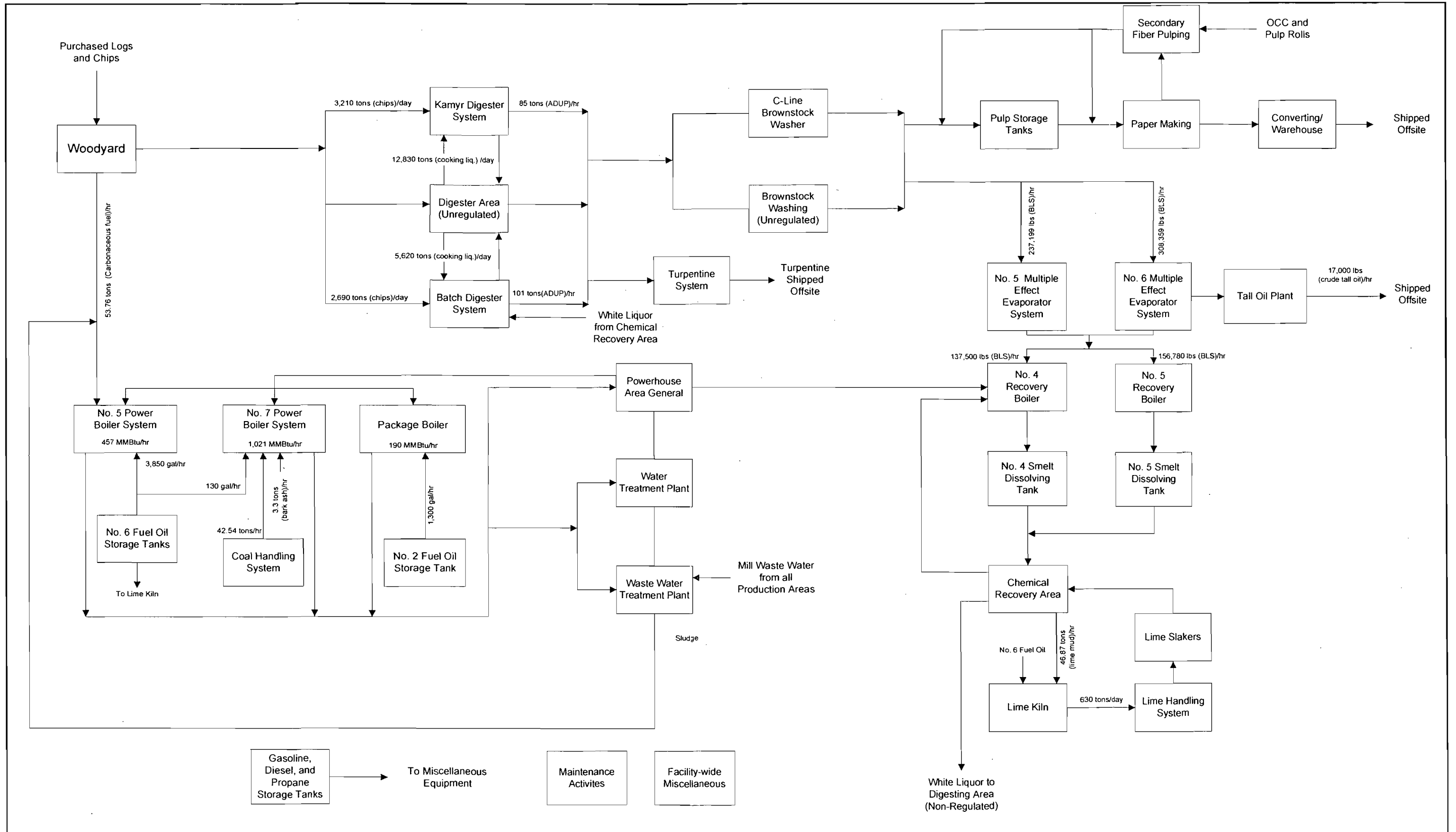
REV.	DATE	ISSUED FOR REVIEW	DESCRIPTION	BY	APVD	REV.	DATE	DESCRIPTION	BY	APVD	REV.	DATE	DESCRIPTION	BY	APVD	ENGINEERING	DATE
0																	


SMURFIT-STONE
 CONTAINER CORPORATION
 FERNANDINA BEACH, FL
 ENGINEERING DEPT.

DRAWING TITLE
SITE PLAN
BUILDING LAYOUT
AND MILL ROAD

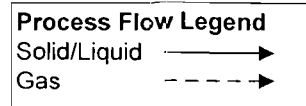
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ATTACHMENT JSF-FI-C3
PROCESS FLOW DIAGRAM



Attachment JSF-FI-C3. Process Flow Diagram

Jefferson Smurfit Corp. (U.S.) - Fernandina Beach, Florida



Facility - Overall Plant



ATTACHMENT JSF-FI-C4

**PRECAUTIONS TO PREVENT EMISSIONS
OF UNCONFINED PARTICULATE MATTER**

ATTACHMENT JSF-FI-C4**PRECAUTIONS TO PREVENT EMISSIONS
OF UNCONFINED PARTICULATE MATTER**

Unconfined particulate matter emissions are minimized by the following means:

Woodyard

Chips are transported to the chip screening building and stacker/reclaimers on a covered conveyor. Sawdust and rejected chips from the screening process are transported by covered conveyor to the bark reclaimer. Sawdust and chips are removed from the conveyors and transfer points and placed onto the ground. The chips, sawdust, and other wood debris that escapes are collected with heavy equipment and placed in the bark reclaimer or the bark pile.

Pulping System

Chips are transported to the batch digester building on covered conveyors. Chips are transported to the Kamyra Digester in a blow line providing complete enclosure. Chips and fines that escape the transfer system are removed and then swept and carried to a chute where it is transferred to the ground or directly into a dumpster outside the digester building. The pile that is created is reclaimed into the bark system.

Chemical Recovery Area

Purchased lime is unloaded in a closed system and transferred to storage bins. Reburned lime from the lime kiln is transferred in an enclosed elevator system to storage bins. Reburned and purchased lime are both stored in bins. Both bins are equipped with permitted baghouses. Lime piles are minimized by reclaiming as quickly as possible and hauling offsite if necessary. Water is applied when necessary to minimize fugitive dust emissions.

Facility

Particulate matter emissions from roadways and storage piles are minimized by water application, as necessary. Paved parking areas are maintained on site for employee parking. Internal mill roadways are generally paved and speed limits are maintained. Vegetation and trees are maintained on the north and east perimeters of the facility to prevent airborne particulate emissions from these areas.

ATTACHMENT JSF-FI-C5

FUGITIVE EMISSIONS IDENTIFICATION

ATTACHMENT JSF-FI-C5**FUGITIVE EMISSIONS IDENTIFICATION**

Potential fugitive emissions of volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions which may result from the operation of this facility are described in the following emission units:

- Brownstock Washing (EU 024 and EU 026)
- Woodyard (EU 025)
- Chemical Recovery (EU 028)
- Converting/Warehouse (EU 029)
- Facility Wide Miscellaneous (EU 030)
- Secondary Fiber Pulping (EU 031)
- Papermaking (EU 032)
- Pulping System-MACT I (EU 033)

Refer to these emission units for additional information.

ATTACHMENT JSF-FI-C8

LIST OF PROPOSED INSIGNIFICANT ACTIVITIES

ATTACHMENT JSF-FI-C8**LIST OF PROPOSED INSIGNIFICANT ACTIVITIES**

The EPA White Paper Trivial List contains miscellaneous activities which may also be considered insignificant for Title V permitting purposes. Several of these activities occur or may occur at this facility. Therefore, the trivial list is attached in the following pages.

LIST OF ACTIVITIES THAT MAY BE TREATED AS "TRIVIAL"

The following types of activities and emissions units may be presumptively omitted from part 70 permit applications. Certain of these listed activities include qualifying statements intended to exclude many similar activities.

Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.

Air-conditioning units used for human comfort that do not have applicable requirements under title VI of the Act.

Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

Non-commercial food preparation.

Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction.

Janitorial services and consumer use of janitorial products.

Internal combustion engines used for landscaping purposes..

Laundry activities, except for dry-cleaning and steam boilers.

Bathroom/toilet vent emissions.

Emergency (backup) electrical generators at residential locations.

Tobacco smoking rooms and areas.

Blacksmith forges.

Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not

otherwise triggering a permit modification.¹

Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.

Portable electrical generators that can be moved by hand from one location to another².

Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.

Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAP metals.³

Air compressors and pneumatically operated equipment, including hand tools.

Batteries and battery charging stations, except at battery manufacturing plants.

Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP.⁴

¹Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise required.

²"Moved by hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.

³Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production level thresholds. Brazing, soldering, welding and cutting torches directly related to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

⁴Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

Equipment used to mix and package, soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

Drop hammers or hydraulic presses for forging or metalworking.

Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.

Vents from continuous emissions monitors and other analyzers.

Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.

Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.

Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP.

CO₂ lasers, used only on metals and other materials which do not emit HAP in the process.

Consumer use of paper trimmers/binders.

Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.

Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants.

Laser trimmers using dust collection to prevent fugitive emissions.

Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents.⁵

⁵Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.

Routine calibration and maintenance of laboratory equipment or other analytical instruments.

Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.

Hydraulic and hydrostatic testing equipment.

Environmental chambers not using hazardous air pollutant (HAP) gasses.

Shock chambers.

Humidity chambers.

Solar simulators.

Fugitive emission related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.

Process water filtration systems and demineralizers.

Demineralized water tanks and demineralizer vents.

Boiler water treatment operations, not including cooling towers.

Oxygen scavenging (de-aeration) of water.

Ozone generators.

Fire suppression systems.

Emergency road flares.

Steam vents and safety relief valves.

Steam leaks.

Steam cleaning operations.

Steam sterilizers.

ATTACHMENT JSF-FI-C9

LIST OF EQUIPMENT/ACTIVITIES REGULATED UNDER TITLE VI

ATTACHMENT JSF-FI-C9

LIST OF EQUIPMENT REGULATED UNDER TITLE VI

Air Conditioning Units
(> 50 pounds coolant charge)

Air Conditioning Unit	Model #	Type of Coolant	Coolant Charge (lbs)
No. 4 Chiller	19 FA	R12	1,400
No. 5 Chiller	19 FA	R12	1,400
Lime Kiln Wet End Control Room	5WUD-038FDA	R22	72
Coal Shaker MCC Room	TTA240B400DBA	R22	53
Administration Building Chiller	RTHB255FLF00EW	R22	1,020
Central Control Room (backup)	Pomona Air 3000	R22	53
Pulpmill Control Room	WC2000 408 66	R22	58
No. 3 & 4 Paper Machine Control Room (backup)	WC2000 408 66	R22	53

ATTACHMENT JSF-FI-C10

ALTERNATIVE METHODS OF OPERATION

ATTACHMENT JSF-FI-C10

ALTERNATIVE METHODS OF OPERATION

Facility

The facility boilers may operate under six alternative methods of operation. These methods are described below:

Alternative Methods of Operation	Package Boiler	No. 5 Power Boiler	No. 7 Power Boiler	No. 4 Recovery Boiler	No. 5 Recovery Boiler
1	X	X*	X*	X*	X*
2		X	X	X	X
3	X		X	X	X
4	X	X		X	X
5	X	X	X		X
6	X	X	X	X	

Note:

X Represents boiler in service.

* Represents one or more boilers operating at a reduced rate such that net emissions are not increased.

The boilers may also burn a variety of fuels, as described below:

Boiler	Combination and Type of Fuel
Package Boiler	1. Fuel Oil.
No. 5 Power Boiler	1. Fuel Oil, 2. Carbonaceous Fuel.
No. 7 Power Boiler	1. Coal, 2. Coal, Carbonaceous Fuel, Fuel Oil, in any Combination, or 3. Fuel Oil.
No. 4 Recovery Boiler	1. Black Liquor, 2. Black Liquor and Fuel Oil, or 3. Fuel Oil.
No. 5 Recovery Boiler	1. Black Liquor, 2. Black Liquor and Fuel Oil, or 3. Fuel Oil.

ATTACHMENT JSF-FI-C12

FACILITY ADDITIONAL APPLICABLE REQUIREMENTS

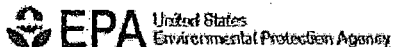
ATTACHMENT JSF-FI-C12**FACILITY ADDITIONAL APPLICABLE REQUIREMENTS**

Applicable Requirements, as defined in Rule 62-210.200(27), but not identified in Section D of the emission unit sections, are included in the emission unit attachments entitled “**Identification of Additional Applicable Requirements**”. Any air construction permit issued by the Department and not reflected in the current Title V permit are included in these attachments and are provided for information purposes.

ATTACHMENT JSF-FI-C13

RISK MANAGEMENT PLAN VERIFICATION

Facility Name: Jefferson Smurfit Corporation (US)
EPA ID: 1000 0014 9797



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

Warren S. Flenniken
Jefferson Smurfit Corporation (US)
8182 Maryland Avenue
Clayton, MO 63105

July 23, 1999

EPA Facility ID#: 1000 0014 9797
Postmark Date: 06/21/1999
Anniversary Date: 06/21/2004

NOTIFICATION LETTER: COMPLETE RMP

The U.S. Environmental Protection Agency (EPA) received your Risk Management Plan (RMP) dated with the above postmark date. **This letter notifies you that your RMP is "complete" according to EPA's completion check.** The completion check is a program implemented by EPA to determine whether a submitted RMP includes the minimum amount of information every RMP must provide. The completion check does not assess whether a submitted RMP should have provided additional information or whether the information it provides is accurate or appropriate. In other words, it does not indicate that the RMP meets the requirements of 40 CFR Part 68.

Please note the anniversary date indicated above. Your RMP must be revised and updated by this date or earlier as required by 40 CFR §68.190. Please also note your EPA Facility ID number as identified at the top of this letter; all future Risk Management Plan submissions, corrections and other correspondence must include this number.

Your RMP (excluding the Offsite Consequence Analysis data) can be viewed on RMP*Info™, a national database on the Internet at <http://www.epa.gov/enviro>.

If you have any questions, please call one of the following numbers:

(1) For RMP rule interpretation questions, call the EPCRA Hotline at (800) 424-9346 or (703) 412-9810 (in the D.C. Metro area).

(2) For RMP*Submit installation and software questions, or information on the status of your RMP, contact the RMP Reporting Center at (703) 816-4434, or write to the:

RMP Reporting Center
P.O. Box 3346
Merrifield, VA 22116-3346

(3) For more information on the Risk Management Program, you can contact your Implementing Agency. Your Implementing Agency is **Florida Department of Community Affairs, 2555 Shumard Oak Boulevard, Tallahassee, FL, 32399, Phone: 850-413-9970.**

Thank you for your cooperation in this matter.

Sincerely,

RMP Reporting Center

Enclosure:
Risk Management Plan (if submitted on paper)

ATTACHMENT JSF-FI-C14

COMPLIANCE REPORT AND PLAN

**ATTACHMENT JSC-FI-C14
COMPLIANCE REPORT AND PLAN
FOR
JEFFERSON SMURFIT CORPORATION
FERNANDINA BEACH MILL**

1. **MACT II Sources -**
- No. 4 Recovery Boiler (EU 007)
 - No. 5 Recovery Boiler (EU 011)
 - No. 4 Smelt Dissolving Tank (EU 013)
 - No. 5 Smelt Dissolving Tank (EU 014)
 - No. 4 Lime Kiln (EU 021)

Applicability of Future Regulatory Requirements

The MACT II rules for combustion sources in the pulp and paper source category (40 CFR 63, Subpart MM) require that controls and monitoring be installed and operating prior to the final compliance date for these sources of March 13, 2004. An air construction permit application may need to be submitted and approved prior to the final compliance date, in order to implement the MACT II standards. A Title V permit revision application will also have to be submitted to the Department to implement the MACT II requirements into the facility's operating permit.

Compliance Plan

The MACT II air emission standards for HAPs, and the related testing, monitoring, and recordkeeping requirements of the MACT rule, are not applicable until March 13, 2004. JSC will comply with the HAPs standard beginning March 13, 2004. Until that time, the current emission limits for the above listed MACT II sources will continue to apply. JSC will install any necessary control equipment and monitoring equipment prior to the final compliance date. In addition, JSC will submit an air construction permit application in 2003, if necessary, in order to implement the MACT II requirements. A Title V revision application will be submitted to the Department in accordance with the Florida rules.

2. **Package Boiler**

JSC has submitted an air construction permit application to the Department for the package Boiler. The Department has reviewed the application and issued a request for additional

information on October 30, 2002. JSC has up to 90 days to respond to this request. JSC will respond to the request for additional information no later than February 1, 2003. In anticipation that the Package Boiler application will be approved, this emissions unit has been included in this Title V revision application.

3. Compliance Assurance Monitoring (CAM) Plan

Deviations From Applicable Requirements

The CAM Plan required by 40 CFR Part 64 was to be submitted with an application for a renewal of the Title V permit.

Compliance Plan

The required CAM Plan will be submitted to the Department prior to February 1, 2003.

ATTACHMENT JSF-FI-C15
COMPLIANCE STATEMENT

ATTACHMENT JSF-FI-C15**COMPLIANCE STATEMENT**

"I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete."

Warren S. Flenniken

Signature, Responsible Official

Warren S. Flenniken, V.P. and General Manager

12/11/02

Date

EMISSION UNIT 1
NO. 5 POWER BOILER

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p>No. 5 Power Boiler</p>			
<p>4. Emissions Unit Identification Number: <input type="checkbox"/> No ID</p> <p>ID: 006 <input type="checkbox"/> ID Unknown</p>			
<p>5. Emissions Unit Status Code:</p> <p>A</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code:</p> <p>26</p>	<p>8. Acid Rain Unit?</p> <p><input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p>No. 5 Power Boiler is a combination boiler which may be fired with oil and/or carbonaceous fuels. NCGs will be burned in the boiler as a backup to the No. 4 Lime Kiln.</p>			

Emissions Unit Control Equipment

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p> <p>Electrostatic Precipitator</p> <p>Multiple Cyclone w/o Fly Ash Reinjection</p> <p>TRS Destruction in Boiler</p>
<p>2. Control Device or Method Code(s): 010, 076, 021</p>

Emissions Unit Details

<p>1. Package Unit:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">Manufacturer:</td> <td style="width: 50%; border: none;">Model Number:</td> </tr> </table>	Manufacturer:	Model Number:				
Manufacturer:	Model Number:					
<p>2. Generator Nameplate Rating: MW</p>						
<p>3. Incinerator Information:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%; border: none;">Dwell Temperature:</td> <td style="width: 40%; border: none;">°F</td> </tr> <tr> <td style="border: none;">Dwell Time:</td> <td style="border: none;">seconds</td> </tr> <tr> <td style="border: none;">Incinerator Afterburner Temperature:</td> <td style="border: none;">°F</td> </tr> </table>	Dwell Temperature:	°F	Dwell Time:	seconds	Incinerator Afterburner Temperature:	°F
Dwell Temperature:	°F					
Dwell Time:	seconds					
Incinerator Afterburner Temperature:	°F					

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	805	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:	24	hours/day
	7	days/week
	52	weeks/year
	8,760	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p>Maximum Heat Input Rate based on firing carbonaceous fuel and No. 6 fuel oil in combination.</p>		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-296.404(3)(a)3. – TRS Venting
62-296.404(3)(f) – Boilers Used to Incinerate TRS
62-296.404(4)(e)3. – TRS Test Method
62-296.404(4)(f) – Test Procedures
62-296.404(5)(d) – Surrogate Parameters
62-296.404(6) – Quarterly Reporting
62-296.404(1)(b)
62-296.404(3)
62-297.310
62-297.401(1)(a)
62-297.401(2)
62-297.401(3)
62-297.401(4)
62-297.401(5)
62-297.401(6)
62-297.401(9)(a)
40 CFR 63.443(d)(4) – MACT Standards – Boiler for HAP Control
40 CFR 63.443(e) – MACT Standards – Excess Emissions

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 006		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 257 feet	7. Exit Diameter: 11 feet	
8. Exit Temperature: 448 °F	9. Actual Volumetric Flow Rate: 411,000 acfm	10. Water Vapor: 19 %	
11. Maximum Dry Standard Flow Rate: 376,000* dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): <p>Stack parameters updated from recent stack test data. Flow rate calculated based on ratio of maximum operating rate to actual operating rate during stack test.</p> <p>*Corrected to 8-percent O₂.</p>			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External Combustion Boilers, Industrial, Wood/Bark Waste Fired		
2. Source Classification Code (SCC): 1-02-009-02		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: 53.8	5. Maximum Annual Rate: 470,978	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 8.5
10. Segment Comment (limit to 200 characters): Wood/Bark Waste is carbonaceous fuel, which includes wood, bark, bark ash, sawdust wood residue sludge, and recycle paper residual. Based on 457 MMBtu/hr and heat content of carbonaceous fuel assumed to be 4,250 Btu/lb.		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External Combustion Boilers, Industrial, Residual Oil – Grade 6 Oil Fired		
2. Source Classification Code (SCC): 1-02-004-01		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 4.417	5. Maximum Annual Rate: 33,726	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 2.5	8. Maximum % Ash:	9. Million Btu per SCC Unit: 149
10. Segment Comment (limit to 200 characters): Max annual rate based on 92,400 gal/day (573.4 MMBtu/hr). Fuel oil may also include on-spec used oil. Max hourly rate of 4,417 gal/hr is based on max hourly heat input on fuel oil of 657.8 MMBtu/hr.		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External Combustion Boilers, Industrial, Distillate Oil – Grades 1 and 2 Oil		
2. Source Classification Code (SCC): 1-02-005-01		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 4.837	5. Maximum Annual Rate: 36,932	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.5	8. Maximum % Ash:	9. Million Btu per SCC Unit: 136
10. Segment Comment (limit to 200 characters): Maximum hourly rate is based on 1-hour average and 657.8 MMBtu/hr. Maximum annual rate is based on a 24-hour average of 4,216 gal/hr and 573.4 MMBtu/hr and 8,760 hr/yr.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
8. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	010	076	EL
PM ₁₀	010	076	NS
SO ₂			EL
NO _x			NS
CO			NS
VOC			NS
TRS	021		EL
HAPS	021		NS
H095			NS
H106			NS
H107			NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control:	
3. Potential Emissions: 171.9 lb/hour	600.5 tons/year	4. Synthetically Limited? <input type="checkbox"/>
5. Range of Estimated Fugitive Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
6. Emission Factor: 0.3 lb/MMBtu Reference: Permit Limit	7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): Carbonaceous Fuel: 0.3 lb/MMBtu x 457 MMBtu/hr = 137.1 lb/hr Fuel Oil: 0.1 lb/MMBtu x 348 MMBtu/hr = 34.8 lb/hr Total: 137.1 + 34.8 = 171.9 lb/hr Annual emissions based on permit limit.		
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Potential emissions based on firing carbonaceous and fuel oil in combination.		

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.3 lb/MMBtu	137.1 lb/hour	600.5 tons/year
4. Equivalent Allowable Emissions:		
5. Method of Compliance (limit to 60 characters): Annual stack test using EPA Method 5.		
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Permit Limit (Permit No. 0890003-001-AV). Applies to carbonaceous fuel firing only.		

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 1,733.7 lb/hour 6,618.62 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 1,733.7 lb/hour Reference: Permit Limit		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): Emissions based on permit limits.			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Potential emissions based on firing only No. 6 fuel oil (sulfur content 2.5%).			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 2.5% S content		4. Equivalent Allowable Emissions: 1,733.7 lb/hour tons/year	
5. Method of Compliance (limit to 60 characters): Fuel Analysis			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Based on permit limit (Permit No. 0890003-001-AV).			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: TRS	2. Total Percent Efficiency of Control:
3. Potential Emissions: 11.74 lb/hour 12.85 tons/year	4. Synthetically Limited? <input checked="" type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 to tons/year	
6. Emission Factor: 5 ppmvd @ 10% O₂ Reference: Permit Limit	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): <p>Flow rate = 376,000 dscfm @ 8% O₂. Correct TRS @ 8% O₂ to 10% O₂: 5 ppm x [(21-8)/(21-10.0)] = 5.9 ppm. 376,000 ft³/min x 60 min/hr x 2,116.8 lb_r/ft² x 5.9 ft³/10⁶ ft³ ÷ 1,545 ft-lb_r/lb-mol °R x 34 lb H₂S/lb-mol (H₂S) ÷ 528 °R = 11.74 lb/hr TRS as H₂S. 11.74 lb/hr x 2,190 hr/yr x ton/2,000 lb = 12.85 TPY.</p>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): <p>Emission Factor corrected to 10% O₂. TRS is vented to the No. 4 Lime Kiln under normal operation and to the No. 5 Power Boiler when the kiln is offline, which is a maximum 25% of the time.</p>	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 5 ppmvd at 10% O₂	4. Equivalent Allowable Emissions: 11.74 lb/hour 12.85 tons/year
5. Method of Compliance (limit to 60 characters): <p>EPA Method 16 or 16A. Maintained at 1,200°F and 1/2 second residence time.</p>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <p>Permit limit (Permit No. 0890003-001-AV).</p>	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE30	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 30 % Exceptional Conditions: 40 % Maximum Period of Excess Opacity Allowed: 2 min/hour	
4. Method of Compliance: Annual test using EPA Method 9	
5. Visible Emissions Comment (limit to 200 characters): Permit limit (Permit No. 0890003-001-AV).	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 2

1. Parameter Code: FLOW	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information: Manufacturer: Micromotion Model Number: DS150S141 Serial Number: 142742	
5. Installation Date: 01 Nov 1992	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Fuel flow meter required per AC45-194149	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 2 of 2

1. Parameter Code: VE	2. Pollutant(s):
3. CMS Requirement:	[] Rule [X] Other
4. Monitor Information: Manufacturer: Land Combustion Model Number: 4500 Mark II Serial Number: 9995411	
5. Installation Date: Nov 1999	6. Performance Specification Test Date: Nov 1999
7. Continuous Monitor Comment (limit to 200 characters): Per AC45-194149.	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

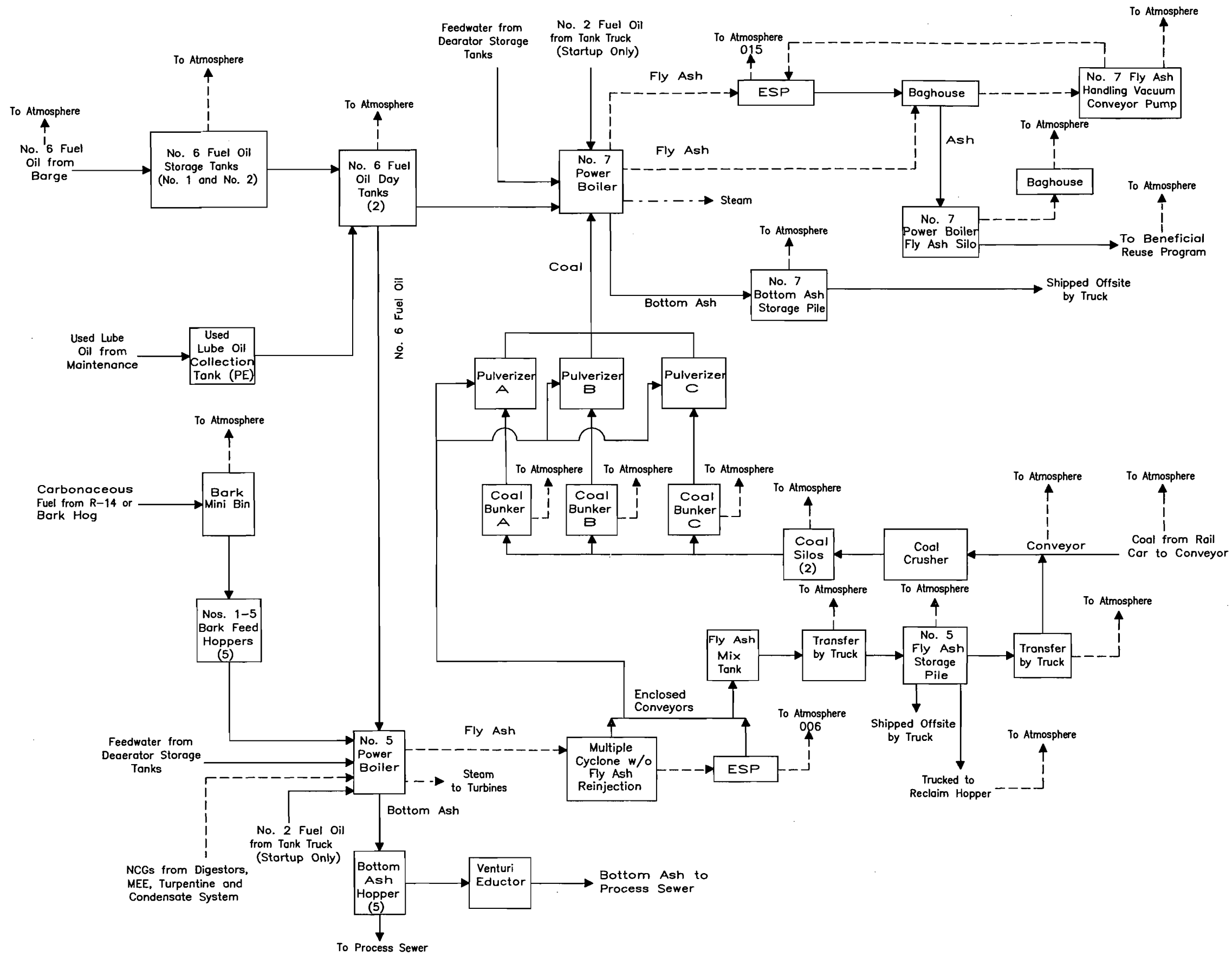
Supplemental Requirements

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: JSF-EU1-J1 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input checked="" type="checkbox"/> Attached, Document ID: JSF-EU1-J2 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: JSF-EU1-J3 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input checked="" type="checkbox"/> Attached, Document ID: JSF-EU1-J4 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input checked="" type="checkbox"/> Attached, Document ID: JSF-EU1-J6 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation [X] Attached, Document ID: JSF-EU1-J11 [] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [X] Attached, Document ID: JSF-EU1-J13 [] Not Applicable
14. Compliance Assurance Monitoring Plan [X] Attached, Document ID: Attachment A [] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [X] Not Applicable

ATTACHMENT JSF-EU1-J1
PROCESS FLOW DIAGRAM



0237609/4/4.4/4.4.1/JSF-EU1-J1.dwg

Process Flow Legend:	
Solid / Liquid	→
Gas	- - - - -
Steam	- - - - -

Jefferson Smurfit Corp. (U.S.)
 Fernandina Beach, FL
 Process Flow Diagram with MACT I

Process Area: No. 5 Power Boiler, Utilities Area	
Filename:	JSF-EU1-J1.DWG
Latest Revision Date:	December 6, 2002



ATTACHMENT JSF-EU1-J2

FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT JSF-EU1-J2**FUEL ANALYSIS
NO. 5 POWER BOILER**

Fuel	Density (lb/gal)	Moisture (%)	Weight %			Heat Capacity
			Sulfur	Nitrogen	Ash	
Carbonaceous Fuel ^a	--	50	0.05	0.08	0.6	4,250 Btu/lb
No. 2 Fuel Oil ^b	6.83	--	0.5	--	--	136,000 Btu/gal
No. 6 Fuel Oil ^b	8.33	--	2.5	--	0.1	145,000-150,000 Btu/gal

^a Carbonaceous fuel consists of bark, woodwaste, sawdust, sludge, and bark ash.

^b May include on-spec used oil.

ATTACHMENT JSF-EU1-J3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT JSF-EU1-J3a

CONTROL EQUIPMENT PARAMETERS

NO. 5 POWER BOILER ELECTROSTATIC PRECIPITATOR

Manufacturer	Research Cottrell		
Model No.	IP 3356		
Date of Installation	November 1985		
Inlet Gas Temperature	475 °F		
Inlet Gas Flow Rate	340,000 acfm		
Primary Voltage	300 kV		
Secondary Voltage	60 kV		
Primary Current	125 Amps		
Secondary Current	500 mAmps		
Spark Rate	2 per minute		
Pressure Drop, Design	+25 inches of H ₂ O		
Pressure Drop, Operating	3 inches of H ₂ O		
Maximum Permitted Particulate Matter Emissions *	137.1 lbs/hr		
Pollutants	Inlet Loading	Outlet Loading	Control Efficiency
Particulate Matter	2,160 lb/hr	137.1 lb/hr	94%

* Values obtained from Permit No. 0890003-001-AV. Based on firing carbonaceous fuel.

ATTACHMENT JSF-EU1-J3b

CONTROL EQUIPMENT PARAMETERS

NO. 5 POWER BOILER MULTIPLE CYCLONE WITHOUT FLY ASH REINJECTION

Manufacturer	<u>Barron Industries</u>		
Model No.	<u>55-51100-40</u>		
Date of Installation	<u>April 1986</u>		
Inlet Gas Temperature	<u>300 - 400 °F</u>		
Inlet Gas Flow Rate	<u>4.5 acfm</u>		
Pressure Drop Across Device	<u>288 inches of H₂O</u>		
Number of Tubes	<u>64</u>		
Number of Tubes blanked off			
Pollutants	Inlet Loading	Outlet Loading	Control Efficiency
Particulate Matter (PM)	2.0 gr/dscf	0.5 gr/dscf	75%

ATTACHMENT JSF-EU1-J4

DESCRIPTION OF STACK SAMPLING FACILITIES

ATTACHMENT JSF-EU1-J4**DESCRIPTION OF STACK SAMPLING FACILITY
NO. 5 POWER BOILER**

The following is a description of the No. 5 Power Boiler stack sampling facilities [as required per Rule 62-297.310(6)].

Sampling ports

1. All sampling ports have an inside diameter of approximately 5 inches.
2. The ports are capable of being sealed when not in use.
3. The sampling ports are located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. A complete application to construct was filed before December 1, 1980; therefore, four sampling ports, each 90 degrees apart, were installed since the stack has an outside diameter of less than 10 feet.

Work platforms

1. The working platform is approximately 40 square feet in area and approximately 4 feet wide.
2. This circular stack has more than two sampling ports; therefore, the work platform extends 360 degrees around the stack.
3. The platform is equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor opening cover if ladder access is used to reach the platform.

Means of access

1. Ladders to the work platform are only approximately 10 feet in length.
2. Walkways over free fall areas are equipped with safety rails and toeboards.

Equipment support structures

1. A complete monorail or dualrail arrangement is substituted for the eyebolt and bracket.

ATTACHMENT JSF-EU1-J6

PROCEDURES FOR STARTUP AND SHUTDOWN

ATTACHMENT JSF-EU1-J6**STARTUP AND SHUTDOWN PROCEDURE**

No. 5 Power Boiler with electrostatic precipitator (ESP) and multiple cyclone.

Startup

Startup requires approximately 4.5-6 hours to reach full boiler capacity. Excess emissions of particulate matter may occur during this time. To minimize the duration and magnitude of excess emissions during startup, the following procedures are undertaken. Bark is put on grate of bark feeding system. Air is adjusted to lower excess O₂. When O₂ is below 10 percent and decreasing, then the ESP is energized. Cannot start before O₂ drops or a fire could start in the ESP.

Shutdown

Shutdown requires approximately 4.5-6 hours. Excess emissions of particulate matter may occur during this time. To minimize the duration and magnitude of excess emissions during shutdown, the following procedures are undertaken. When oil is added and bark feed is stopped, the remaining bark on grate will burn out and the O₂ will increase. The ESP will trip out when O₂ reaches 10 percent.

ATTACHMENT JSF-EU1-J11

ALTERNATIVE METHODS OF OPERATION

ATTACHMENT JSF-EU1-J11

ALTERNATIVE METHODS OF OPERATION

No. 5 Power Boiler

The No. 5 Power Boiler may be operated under the Alternative Methods of Operation described below:

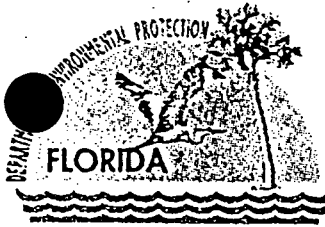
Alternative Method	Fuel Options	Maximum Heat Input Rate (MMBtu/hr)	Maximum Operating Rate
1	Carbonaceous fuel only (24-hr)	457 ^a	107,600 lb/hr ^a
2	No. 6 fuel oil only ^b (1-hr)	657.8	4,417 gal/hr ^b
	(24-hr)	573.4 ^a	3,850 gal/hr ^{a,b}
3	No. 2 fuel oil only ^b (1-hr)	657.8	4,837 gal/hr
	(24-hr)	573.4 ^a	4,216 gal/hr
4	Any combination of any alternative method listed above, while either burning NCGs or not burning NCGs.	805	Bark - 457 MMBtu/hr Fuel oil - 348 MMBtu/hr

^a Based on permit limit.

^b Fuel oil may include on-spec used oil.

ATTACHMENT JSF-EU1-J13

IDENTIFICATION OF ADDITIONAL APPLICABLE REQUIREMENTS



Jeb Bush
Governor

Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Struhs
Secretary

NOTICE OF PERMIT

CERTIFIED-RETURN RECEIPT

Mr. Warren S. Flenniken, V.P. and General Manager
Jefferson Smurfit Corporation (U.S.), Mill Division
North 8th Street
Fernandina Beach, Florida 32034

Dear Mr. Flenniken:

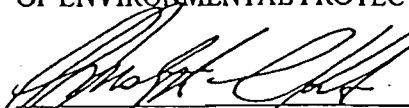
Nassau County - AP
Jefferson Smurfit Corporation (U.S.), Mill Division
MACT I Compliance

Enclosed is Permit Number 0890003-003-AC (MODIFIED) to construct the subject air pollution emissions unit(s), issued pursuant to Section 403.087, Florida Statutes (FS).

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

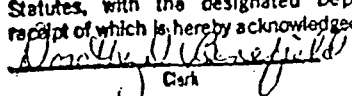
Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


Christopher L. Kirts, P. E.
District Air Program Administrator

RFS
CLK:RFS

cc: David A. Buff, P.E.
Tim McKelvey, Jefferson Smurfit Corporation

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52 Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.
 8/17/02
Clerk Date



Jeb Bush
Governor

Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Struhs
Secretary

PERMITTEE:

Jefferson Smurfit Corporation (US)
North 8th Street,
Fernandina Beach, Florida 32034

I.D. Number: 0890003
Permit/Cert Number: 0890003-003-AC
Date of Issue: February 29, 2000
Expiration Date: November 16, 2001
Modification Date: August 16, 2000
County: Nassau
Latitude/Longitude: 30° 40' 53" N; 81° 27' 26" W
UTM: E-(17) 456.2; N-3394.1
Project: MACT I Compliance:
No. 5 Power Boiler, EU #006
No. 4 Lime Kiln, EU # 021
Foul Condensate Tank
MODIFICATION

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-296, 62-297 and 62-4. 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:

For the installation and implementation of equipment necessary for compliance with the kraft pulping systems standards of 40 CFR Part 63, Subpart S (MACT I), the emission units are identified below:

Emission Unit/Project Description:

Low Volume High Concentration (LVHC) Noncondensable gases (NCGs) from a new turpentine decanter, weir box, turpentine storage tank, foul condensate collection tank, and the Kamy blow tank, will be collected and tied into a NCG collection system. The NCGs will then be burned in the No. 4 Lime Kiln (primary control device) or the No. 5 Power Boiler (backup/ secondary control device). The No. 5 Power Boiler will be equipped with a new NCG burner nozzle for this purpose.

SO₂ emissions are estimated to increase a total of 10.1 TPY as a result of the NCG burning in the No. 4 Lime Kiln. When vented to the No. 5 Power Boiler during periods of 100-percent fuel oil firing, SO₂ emissions are estimated to increase by 734.8 lb/hr (3-hr average), 498 lb/hr (24-hr average), and 545.3 TPY. The facility will offset potential increase at the No. 5 Power Boiler by firing lower sulfur fuel oil, not to exceed 1.67 percent sulfur by weight, on an annualized basis.

The existing turpentine decanter, weir box, and turpentine storage tank will be replaced and removed from service.

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Emission Unit/Project Description Continued:

On May 23, 2000, the facility provided the following information concerning the Kamyrdigester chip bin:

- Chips are fed through a chip meter and a low-pressure rotary chip feeder into the steaming vessel.
- During this process, each rotating pocket of the rotary chip feeder fills with gases from the steaming vessel as the chips are emptied into the steaming vessel.
- As the chip feeder rotates, the gases in the rotary valve pocket are vented to relieve the pressure prior to refilling with chips from the chip bin.
- Fresh purge steam is directed into the pocket valve to facilitate this process.
- The purged gases are then vented to the chip bin.
- The chips in the chip bin are stored at a depth of 10-15 feet or greater.
- Flash steam is not used directly in the Kamyrdigester chip bin.

Specific Condition Nos. 3, 4 and 16 of this permit are being modified to include applicable State TRS requirements at the No. 5 Power Boiler and to remove the Kamyrdigester Rotary Valve Pocket ("Pocket Vent") gas collection requirement, respectively.

Located: North 8th Street, Fernandina Beach, Nassau County, Florida.

In accordance with:

Construction permit application received June 9, 1999
Additional Information Received September 23, 1999
Comments from Applicant Received December 23, 1999
Comments from Applicant Received January 21, 2000
Comments from Applicant Received February 1, 2000
Request for Modification of Permit Received May 23, 2000
Additional Information Received August 3, 2000

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GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the conditions.

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

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

4. This permit conveys not title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

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

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

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

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

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

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GENERAL CONDITIONS:

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

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

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Compliance with New Source Performance Standards (NSPS)
- Compliance with National Emission Standards for Hazardous Air Pollutants/ Maximum Available Control Technology (MACT)

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GENERAL CONDITIONS:

14. The permittee shall comply with the following:

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

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

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SPECIFIC CONDITIONS:

The following conditions apply to Emission Unit 006, No 5 Power Boiler:

1. Permitted Capacity. The maximum operating rate shall not exceed 805 MMBtu/hr.
[Final Title V Operation Permit No. 0890003-001-AV; Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]
2. Alternative Methods of Operation. The No. 5 Power Boiler is permitted to operate under the Alternative Methods of Operation as described in the table below: [Final Title V Operation Permit No. 0890003-001-AV]

Alternative Method	Fuel Options	Maximum Heat Input Rate (MMBtu/hr)	Maximum Operating Rate
1	Carbonaceous fuel ¹ only	457 MMBtu/hr ²	107,600 lb/hr ²
2	No. 6 fuel oil only ³ (1-hr)	657.8 MMBtu/hr	4,417 gal/hr ³
2	(24-hr)	573.4 MMBtu/hr ²	3,850 gal/hr ^{2,3}
3	No. 2 fuel oil only ³ (1-hr)	657.8 MMBtu/hr	4,837 gal/hr
3	(24-hr)	573.4 MMBtu/hr ²	4,216 gal/hr
4	Any combination of any alternative method listed above	805 MMBtu/hr	Bark - 457 MMBtu/hr Fuel oil - 348 MMBtu/hr

¹Carbonaceous Fuel means bark, wood, sawdust, wastewater wood fiber residuals, and bark ash

²Based on permit limit.

³Fuel oil may include on-spec used oil. Prior to blending it shall comply with the provisions of 40 CFR 279 & 761, and Specific Conditions K.1. - K-3 of Final Title V Operation permit No. 0890003-001-AV.

3. Emission Limits and Standards.
 - a. Particulate Matter and Visible Emissions shall not exceed the limits stated in the Final Title V Operation Permit No. 0890003-001-AV for this emissions unit.
 - b. Sulfur Dioxide Emissions shall be limited to 1,733.7 lb/hr, 1,511.1 lb/hr (24-hour average), and 6,618.62 TPY. The sulfur content of the No. 6 fuel oil fired shall not exceed 2.5 percent by weight.
[Final Title V Operation Permit 0890003-001-AV]

Noncondensable gases (NCGs) may be burned in the No. 5 Power Boiler as the backup to the primary NCG control device, the No. 4 Lime Kiln. The 24-hour average SO₂ emissions during periods of NCG/fuel oil burning will be calculated by summing the SO₂ emissions due to No. 6 fuel oil burning and the SO₂ emissions due to NCG burning in the boiler. For purposes of this condition, SO₂ emissions due to No. 6 fuel oil burning will be determined by the total gallons of fuel oil fired as follows:

$$\begin{aligned} \%S \text{ oil} \times 8.2 \text{ lb/gal} \times 2 \text{ lb SO}_2/\text{lb S} &= (16.4 \times \%S) \text{ lb SO}_2/\text{gal} \\ (16.4 \times \%S) \text{ lb SO}_2/\text{gal} \times \text{gallons of fuel oil fired} &= \text{lb SO}_2 \end{aligned}$$

Each hour of NCG burning shall be deemed to result in SO₂ emissions of 498 lb/hr (24-hour average). SO₂ emissions that are calculated to be greater than 1,511.1 lb/hr (24-hour average) will be offset by burning lower sulfur content fuel oil. This lower sulfur fuel will be purchased and delivered within the next regular scheduled delivery. The offset will be calculated using the above equation for the lower sulfur content fuel

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SPECIFIC CONDITIONS:

Specific Condition Number 3 continued:

oil and taking into account its sulfur content. The offsetting shall be completed no later than the end of the calendar year during which the excess emissions were emitted. The facility shall maintain records of the following:

- The date and time NCGs are fired into the boiler,
- The sulfur content of the lower sulfur fuel oil,
- The flow rate of the fuel oil,
- The amount (gallons) of the lower sulfur fuel oil
- The quantity of SO₂ emissions to be offset.
- The quantity of actual SO₂ emissions offset.

A fuel flow meter with data storage and print capability shall be installed and calibrated on the fuel line supplying the fuel oil to the No. 5 Power Boiler. The fuel flow meter shall meet an accuracy of ± 2.0% of the upper range value, and calibrations will be performed at least annually.

A SO₂ emissions offset report shall be submitted to the Compliance Section of the Northeast District Office on an annual basis. All annual reports shall be postmarked no later than the 45th day following the end of the reporting period (February 15).

- c. **Total Reduced Sulfur (TRS) Emissions.** When NCG gases are collected and routed to this Emissions Unit, TRS emissions shall not exceed 5 ppmvd @ 10% O₂ as a 12-hour average, 11.74 lb/hr and 12.85 tons per year.
[Rule 62-296.404(3)(f)]

- 4. **Test Methods and Procedures.** The permittee shall comply with the testing requirements, methods, and procedures stated in the Final Title V Permit No. 0890003-001-AV for this emissions unit as well as the following:

- a. **TRS Emissions.** It is assumed that compliance with the TRS emissions limit stated in Specific Condition 3.c. is achieved by maintaining the minimum temperature of 1200°F and the 0.5-second residence time.
[62-296.404(3)(a)1., 40 CFR 60.283(a)(1)(iii)]

- 5. **Monitoring Requirements.** The permittee shall comply with the monitoring requirements stated in the Final Title V Permit No. 0890003-001-AV for this emissions unit.

The following conditions apply to Emission Unit 021, No. 4 Lime Kiln:

- 6. **Permitted Capacity.** The operation rates shall not exceed the following:

Unit	Input	Output
No. 4 Lime Kiln	46.87 tons (lime mud-CaCO ₃)/hr	26.25 tons (reburned lime - CaO)/hr
No. 1 Lime Bin	26.25 tons (reburned lime-CaO)/hr	---
No. 2 Lime Bin	44.25 tons (purchased lime)/hr	---
Kamyr digester system	---	85 tons (ADUP)/hr
Batch digester system	---	101 tons (ADUP)/hr
No. 5 MEE System	308,359 lbs (BLS)/hr	---
No. 6 MEE System	274,089 lbs (BLS)/hr	---

[Final Title V Operation Permit No. 0890003-001-AV; Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

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7. Methods of Operation. The No. 4 Lime Kiln is permitted to fire primarily No. 6 fuel oil, which may contain on-spec used oil from mill operations. Liquefied Petroleum Gas (LPG) is fired during startups only. Prior to blending it shall comply with the provisions of 40 CFR 279 & 761, and Specific Conditions K.1. - K-3 of Final Title V Operation Permit No. 0890003-001-AV. [Final Title V Operation Permit No. 0890003-001-AV]
8. Emission Limits and Standards. The permittee shall comply with the emission limits and standards stated in the Final Title V Operation Permit No. 0890003-001-AV for this emissions unit.
9. Test Methods and Procedures. The permittee shall comply with the testing requirements, methods, and procedures stated in the Final Title V Permit No. 0890003-001-AV for this emissions unit.
10. Monitoring Requirements. The permittee shall comply with the monitoring requirements stated in the Final Title V Permit No. 0890003-001-AV for this emissions unit.

The following conditions apply to Emission Units 021 and 006

11. The ID Number and Project Name for this source shall be used on all correspondences.
12. This permit for the No. 4 Lime Kiln and No. 5 Power Boiler shall supercede previous permits issued for these emission units only to the extent of incorporating the Maximum Achievable Control Technology (MACT) regulations 40 CFR 63, Subpart S.
13. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart S no later than April 16, 2001, unless extended pursuant to 40 CFR Part 63, Subpart A. [40 CFR 63.440(d)]
14. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart A- General. [40 CFR 63.440(g)]
15. Hours of Operation. The hours of operation of these units are not restricted, i.e. 8,760 H/Y. [Final Title V Operation Permit No. 0890003-001-AV; Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Subpart S, MACT I Requirements

16. Total HAP emissions from the following equipment systems shall be controlled as specified in Specific Condition No. 17:

LVHC system: the collection of equipment including the digester, turpentine recovery (condensers, decanters, turpentine storage tanks, and any liquid streams associated with the turpentine recovery process such as turpentine decanter underflow), evaporator, steam stripper systems, and any other equipment serving the same function as those previously listed.

[40 CFR 63.443(a)]

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17. Each equipment system listed in Specific Condition No. 16 shall be enclosed and vented into a closed-vent system and routed to the No. 4 Lime Kiln or the No. 5 Power Boiler for total HAP emission reduction. The enclosures and closed-vent system shall meet the requirements specified in Specific Condition No. 19. The HAP emission stream shall be introduced with the primary fuel or into the flame zone.
[40 CFR 63.443(c), 40 CFR 63.443(d)].
18. Periods of excess emissions reported under Specific Condition No. 14 shall not be a violation of Specific Condition No. 17 provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed 1% for No. 4 Lime Kiln and No. 5 Power Boiler. [40 CFR 63.443(e)(1)]

Standards for enclosures and closed-vent systems:

19. Each enclosure and closed-vent system specified in Specific Condition No. 17 for capturing and transporting vent streams that contain HAP shall meet the following requirements.
- (a) Each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in Specific Condition No. 25. Each enclosure or hood opening closed during the initial performance test specified in §§ 63.457(a) for kraft pulping condensates shall be maintained in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs.
 - (b) Each component of the closed-vent system used to comply with Specific Condition No. 16 that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in Specific Condition No. 24.
 - (c) Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §§63.443 shall comply with either of the following requirements:
 - (1) On each bypass line, the permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line once every 15 minutes. The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line; or
 - (2) For bypass line valves that are not computer controlled, the permittee shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal.
- [40 CFR 63.450]

Monitoring Requirements

20. The permittee shall install, calibrate, certify, operate, and maintain according to the manufacturer's specifications, a continuous monitoring system (CMS) as specified in 40 CFR 63.453(a). The CMS shall include a continuous recorder.
[40 CFR 63.453(a)]

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21. Each enclosure and closed-vent system used to comply with Specific Condition No.19 shall comply with the following requirements:
- (1) For each enclosure opening, a visual inspection of the closure mechanism specified in Specific Condition No. 19.(a) shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed.
 - (2) Each closed-vent system shall be visually inspected every 30 days and at other times as requested by the Administrator. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.
 - (3) For positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in Common Condition No.19.(b) measured initially and annually by the procedures in Specific Condition No. 24.
 - (4) Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in Specific Condition No. 25.
 - (5) The valve or closure mechanism specified in Specific Condition No. 19.(c)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.
 - (6) If an inspection required by Specific Conditions Nos. 21.(1) through 21.(5) identifies visible defects in ductwork, piping, enclosures or connections to covers required in Specific Condition No.19, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable.
 - (i) A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified.
 - (ii) The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

The failure to perform procedures required this condition shall constitute a violation of the applicable emission standard of Subpart S and shall be reported in accordance with 40 CFR 63.453(o).
[40 CFR 63.453(k); 40 CFR 63.453(o); April 12, 1999 Amendment]

Recordkeeping Requirements

22. For each applicable enclosure opening, closed-vent system, and closed collection system, the permittee shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment and shall record the following information for each inspection:
- (1) Date of inspection;
 - (2) The equipment type and identification;
 - (3) Results of negative pressure tests for enclosures;
 - (4) Results of leak detection tests;
 - (5) The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection);

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SPECIFIC CONDITIONS:**Specific Condition No. 22 Continued:**

- (6) The date the defect or leak was detected and the date of each attempt to repair the defect or leak;
 - (7) Repair methods applied in each attempt to repair the defect or leak;
 - (8) The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
 - (9) The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;
 - (10) The date of successful repair of the defect or leak;
 - (11) The position and duration of opening of bypass line valves and the condition of any valve seals; and
 - (12) The duration of the use of bypass valves on computer controlled valves.
- [40 CFR 63.454(b)]

Reporting Requirements

23. The Permittee shall submit on a 2 year basis from April 14, 1999, an updated non-binding control strategy report. The report shall contain, at a minimum, the information specified in 40 CFR 63.455(b), in addition to the information required in §63.9(b)(2) of 40 CFR Part 63, Subpart A. [40 CFR 63.455(b)]

Test methods and procedures

- Detectable leak procedures. To measure detectable leaks for closed-vent systems as required in Specific Condition No.19 (b), the permittee shall comply with the requirements of §63.457(d). [40 CFR 63.457(d)]
25. Negative pressure procedures. To demonstrate negative pressure as required in Specific Condition No.19 (a) at process equipment enclosure openings, the permittee shall comply with the requirements of §63.457(e). [40 CFR 63.457(e)]
26. Vent sampling port locations and gas stream properties. For purposes of selecting vent sampling port locations and determining vent gas stream properties, required in § 63.443, the permittee shall comply with the applicable procedures specified in §63.457(b). [40 CFR 63.457(b)]
27. Vent gas stream calculations. To demonstrate compliance with the mass emission rate, mass emission rate per megagram of ODP, and percent reduction requirements for vent gas streams specified in §63.443, the permittee shall comply with requirements of §63.457(i). [40 CFR 63.457(i)]

Foul Condensate Tank:

28. The fixed roof and all openings (access hatches, sampling ports, gauge wells) shall be designed and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million above background, and vented into a closed-vent system that meets the requirements in 40 CFR 63.450 and routed to the No. 4 Lime Kiln or the No. 5 Power Boiler as a backup control device. [40 CFR 63.446(d)(2)(i)]
29. Each opening shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that the tank contains pulping process condensates or any HAP removed from a pulping process condensate stream except when it is necessary to use the opening for sampling, removal, or for equipment inspection, maintenance, or repair. . [40 CFR 63.446(d)(2)(ii)]

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SPECIFIC CONDITIONS:

Submittals:

30. All reports, tests, notifications or other submittals required by this permit shall be submitted to the:

Department of Environmental Protection
Northeast District – Air Program
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256
Telephone: 904/448-4310
Fax: 904/448-4366

31. The permittee shall submit an application for a permit revision to Title V Permit, No. 0890003-001-AV, no later than 180 days after April 16, 2001, the MACT I compliance deadline.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Christopher L. Kirts, P.E.
District Air Program Administrator

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52 Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.
Wendy D. Benefield 8/17/00
Clerk Date

EMISSON UNIT 2
NO. 4 RECOVERY BOILER

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <p style="text-align: center;">No. 4 Recovery Boiler</p>			
4. Emissions Unit Identification Number: [] No ID ID: 007 [] ID Unknown			
5. Emissions Unit Status Code: A	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 26	8. Acid Rain Unit? []
9. Emissions Unit Comment: (Limit to 500 Characters)			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Electrostatic Precipitator

2. Control Device or Method Code(s): **10**

Emissions Unit Details

1. Package Unit:	
Manufacturer:	Model Number:
2. Generator Nameplate Rating: MW	
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	852	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	137,500 lb/hr BLS	
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	24	hours/day
		7 days/week
	52	weeks/year
	8,760	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p>Maximum heat input rate is based on 137,500 lb/hr Black Liquor Solids (BLS) and 6,200 Btu/lb. Process capacity is based on the maximum BLS fired in the No. 4 Recovery Boiler. Smelt flow cannot be measured.</p>		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-296.404(1)(a) – VE Limit
62-296.404(2)(a) – PM Limit
62-296.404(3)(c)1.b. – TRS Limit
62-296.404(3)(c)3. – TRS CEM
62-296.404(4)(a) – Test Methods Kraft Recovery Furnaces
62-296.404(4)(f) – Test Procedures
62-296.404(5)(a) – CMS for TRS
62-296.404(5)(b) – TRS & O ₂ CMS
62-296.404(6)(a) – Quarterly Reporting Requirements – Report
62-296.404(6)(b) - Quarterly Reporting Requirements – File
62-296.404(6)(c)1. – Evaluation of Excess Emissions
62-296.404(6)(c)4. – Good Air Pollution Control Practices
62-296.404(6)(d) – Excess Emissions Notification
62-297.310 – General Compliance Test Methods
62-297.401(1)(a) – EPA Method 1
62-297.401(2) – EPA Method 2 – Determination of Stack Gas Velocity and Volumetric Flow Rate
62-297.401(3) – EPA Method 3 – Gas Analysis for Carbon Dioxide, Oxygen, Excess Air, and Dry Molecular
62-297.401(4) – EPA Method 4
62-297.401(5) – EPA Method 5
62-297.401(9)(c) – EPA Method 9
62-297.401(16) – EPA Method 16
62-297.401(16)(a) – EPA Method 16A

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 007		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
5. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 249 feet	7. Exit Diameter: 12.3 feet	
8. Exit Temperature: 431 °F	9. Actual Volumetric Flow Rate: 342,000 acfm	10. Water Vapor: 26 %	
11. Maximum Dry Standard Flow Rate: 122,484* dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): <p>Stack parameters updated from recent stack test data. Flow rate calculated based on ratio of maximum operating rate to actual operating rate during stack test.</p> <p>*Corrected to 8-percent O₂.</p>			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper & Wood Products Sulfate (Kraft) Pulping: Recovery Furnace/Indirect Contact Evaporator		
2. Source Classification Code (SCC): 3-07-001-10		3. SCC Units: Tons Air-Dried Unbleached Pulp
4. Maximum Hourly Rate: 55	5. Maximum Annual Rate: 481,800	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum hourly rate based on 137,500 lb/hr BLS (24-hr average) fed to No. 4 Recovery Boiler and 2,500 lb BLS/ton ADUP.		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): In-Process Fuel Use, Residual Oil: General		
2. Source Classification Code (SCC): 3-90-004-89		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 3	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
9. Maximum % Sulfur: 2.5	8. Maximum % Ash:	9. Million Btu per SCC Unit: 150
10. Segment Comment (limit to 200 characters): 8.3 gpm/gun x 6 guns x 60 min/hr = 3,000 gal/hr (24-hr average). Fuel oil may contain No. 6 fuel oil & on-spec used oil. It is burned for startup, shutdown, & malfunctions. Consequently, an annual rate is not appropriate.		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	010		EL
PM ₁₀	010		NS
SO ₂			NS
NO _x			NS
CO			NS
VOC			NS
TRS			EL
HAPS			NS
H001			NS
H095			NS
H106			NS
H120			NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 137.5 lb/hour 602.25 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 3 lb/3000 lb BLS Reference: 62-296.404(2)(a), F.A.C.		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): 137,500 lb BLS x (3 lb/3000 lb BLS) = 137.50 lb/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 3 lb/3000 lb BLS		4. Equivalent Allowable Emissions: 137.5 b/hour 602.25 tons/year	
5. Method of Compliance (limit to 60 characters): Annual stack test using EPA Method 5.			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.406(2)(a)			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: TRS	2. Total Percent Efficiency of Control:
3. Potential Emissions: 3.24 lb/hour 14.19 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 to tons/year	
6. Emission Factor: 5 ppmvd @ 8% O₂ Reference: 62-296.404(3)(c)1.b.	7. Emissions Method Code: 5
8. Calculation of Emissions (limit to 600 characters): $420,000 \text{ acfm @ } 11.5\% \text{ O}_2 \times (21-11.5)/(21-8.0) \times (1-0.35) \times [528 \text{ }^\circ\text{R}/(400 + 460) \text{ }^\circ\text{R}] =$ $122,484 \text{ dscfm @ } 8\% \text{ O}_2; 2,116.8 \text{ lb}_f/\text{ft}^2 \times 122,484 \text{ ft}^3/\text{min} \times 60 \text{ min/hr} \times 34/1,545 \times \text{lb}_m\text{-}^\circ\text{R}/\text{ft-lb}_f \times$ $1/528 \text{ }^\circ\text{R} \times 5/10^6 = 3.24 \text{ lb/hr}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emission factor is at 8% O₂ as a 12 hour average.	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 5 ppmvd (12 hr avg)	4. Equivalent Allowable Emissions: 3.24 lb/hour 14.19 tons/year
5. Method of Compliance (limit to 60 characters): TRS Continuous Monitoring System (CMS)	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Requested Allowable Emissions and Units is at 8% O₂ as 12 hr average. TRS CMS required per 62-296.404(5)(a).	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE45	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 45 % Exceptional Conditions: 60 % Maximum Period of Excess Opacity Allowed: 6 min/hour	
4. Method of Compliance: Annual VE test using EPA Method 9, during annual PM test.	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.404(1)(a)	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 1

1. Parameter Code: EM	2. Pollutant(s): TRS
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: STI, Inc. Model Number: Serial Number:	
5. Installation Date: Oct 1999	6. Performance Specification Test Date: Nov 1999
7. Continuous Monitor Comment (limit to 200 characters): Rule 62-296.404(5)(a). SO₂ Analyzer – TECO 43C. O₂ Cell – 2FO Flue Gas CiTiceL.	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

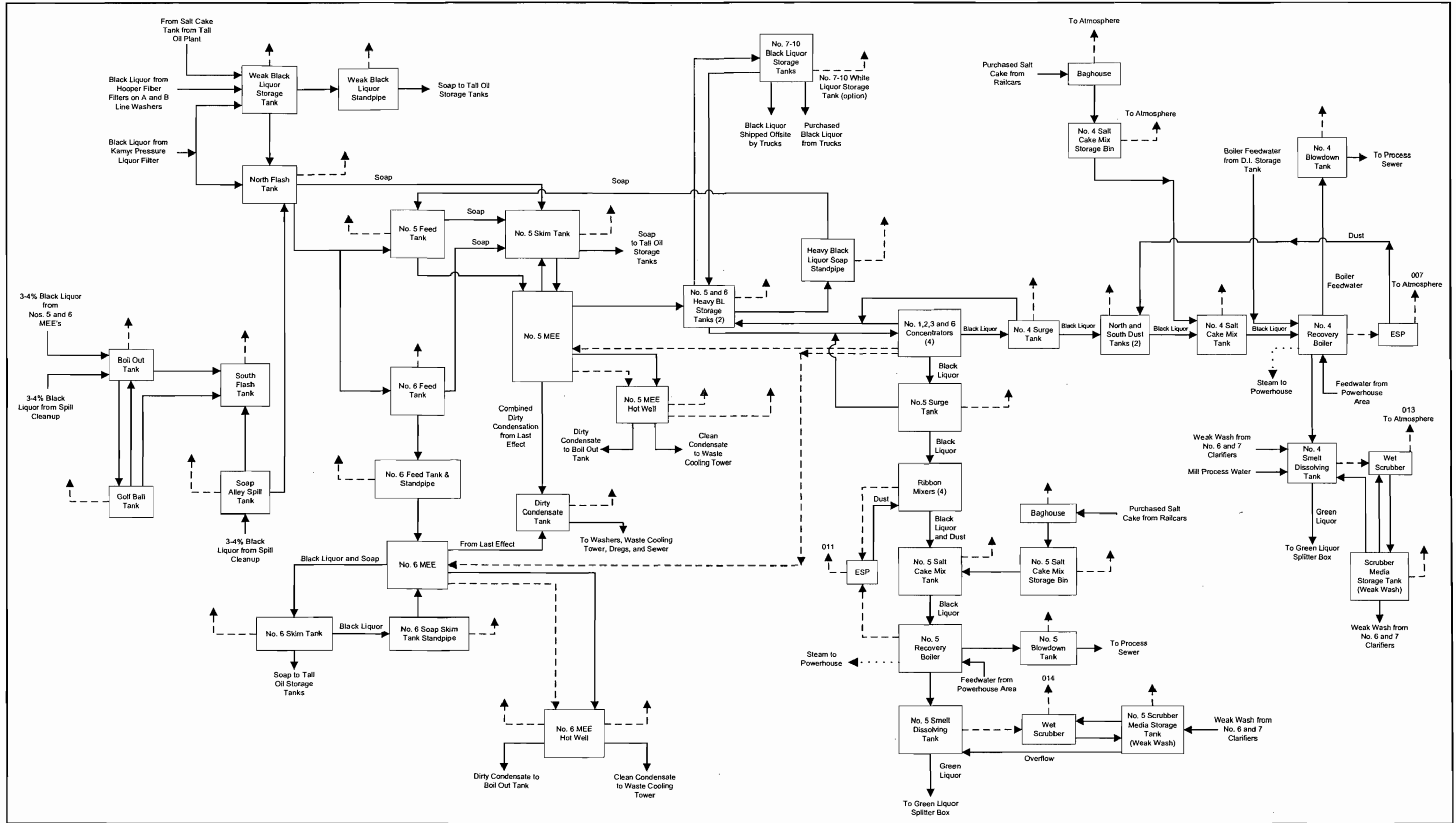
Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: <u>JSF-EU2-J1</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [X] Attached, Document ID: <u>JSF-EU2-J2</u> [] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: <u>JSF-EU2-J3</u> [] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [X] Attached, Document ID: <u>JSF-EU2-J4</u> [] Not Applicable [] Waiver Requested
5. Compliance Test Report [] Attached, Document ID: _____ [] Previously submitted, Date: _____ [X] Not Applicable
6. Procedures for Startup and Shutdown [X] Attached, Document ID: <u>JSF-EU2-J6</u> [] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [] Attached, Document ID: _____ [X] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input checked="" type="checkbox"/> Attached, Document ID: JSF-EU2-J11 [] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [] Attached, Document ID: _____ [X] Not Applicable
14. Compliance Assurance Monitoring Plan [] Attached, Document ID: _____ [X] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [X] Not Applicable

ATTACHMENT JSF-EU2-J1
PROCESS FLOW DIAGRAM



Attachment JSF-EU2-J1
 Process Flow Diagram: Recovery Boilers and Smelt Dissolving Tanks
 Jefferson Smurfit
 Fernandina Beach, FL

Process Flow Legend
 Solid/Liquid ———>
 Gas - - - - ->
 Steam ·····>

Filename: 023/7609/4/4.4/4.4.1/JSF-EU2-J1.vsd
 Date: 12/13/2002



ATTACHMENT JSF-EU2-J2
FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT JSF-EU2-J2**FUEL ANALYSIS****NO. 4 RECOVERY BOILER**

Fuel	Density (lb/gal)	Moisture (%)	Weight % Sulfur	Weight % Nitrogen	Weight % Ash	Heat Capacity Dry
Black Liquor Solids	12	35	--	--	--	5,000-6,300 Btu/lb Avg. 5,400 Btu/lb
No. 6 Fuel Oil ^a	8.33	--	2.5	--	0.1	145,000-150,000 Btu/gal

^a Fuel oil may contain on-spec used oil.

ATTACHMENT JSF-EU2-J3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT JSF-EU2-J3

CONTROL EQUIPMENT PARAMETERS

NO. 4 RECOVERY BOILER ELECTROSTATIC PRECIPITATOR

Manufacturer and Model No.	<u>Environmental Elements</u>		
Date of Installation	December 1974		
Inlet Gas Temperature	420 °F		
Inlet Gas Flow Rate	420,000 acfm		
Primary Voltage	440 kV		
Secondary Voltage	1,500 kV		
Primary Current	290 Amps		
Secondary Current	55 mAmps		
Spark Rate	10-60 per minute		
Pressure Drop	3 inches of H ₂ O		
Maximum Permitted Particulate Matter Emissions *	137.5 lb/hr		
Pollutants	Inlet Loading	Outlet Loading	Control Efficiency
Particulate Matter	13,750 lb/hr	137.5 lb/hr	99%

* Values obtained from Permit No. 0890003-001-AV.

ATTACHMENT JSF-EU2-J4

DESCRIPTION OF STACK SAMPLING FACILITIES

ATTACHMENT JSF-EU2-J4**DESCRIPTION OF STACK SAMPLING FACILITIES
NO. 4 RECOVERY BOILER**

The following is a description of the No. 4 Recovery Boiler stack sampling facilities [as required per Rule 62-297.310(6)].

Sampling ports

1. All sampling ports have an inside diameter of approximately 5 inches.
2. The ports are capable of being sealed when not in use.
3. The sampling ports are located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. A complete application to construct for the No. 4 Recovery Boiler was filed prior to December 1, 1980; therefore, at least two sampling ports, 90 degrees apart, are installed at each sampling location on this circular stack (outside diameter of 15 feet or less).

Work platforms

1. The working platform is approximately 50 square feet in area and approximately 4 feet wide.
2. This circular stack has two sampling ports; therefore, the work platform extends approximately 360 degrees around the stack.
3. The platform is equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor opening cover if ladder access is used to reach the platform.

Means of access

1. Ladders to the work platform are less than 15 feet in length.
2. Walkways over free fall areas are equipped with safety rails and toeboards.

Equipment support structures

1. An eyebolt and angle bracket is attached directly above each port on this vertical stack. The eyebolt is capable of supporting a 500 pound working load.

ATTACHMENT JSF-EU2-J6

PROCEDURES FOR STARTUP AND SHUTDOWN

ATTACHMENT JSF-EU2-J6**STARTUP AND SHUTDOWN PROCEDURE**

No. 4 Recovery Boiler with electrostatic precipitator (ESP).

Startup

Startup requires approximately 6-12 hours. Excess emissions of PM, TRS, and VE may occur over an average period of 2 hours, 4-6 hours, and 2 hours, respectively. To minimize the duration and magnitude of excess emissions during startup, the following procedures are undertaken. Typically, two ESP fields are energized in conjunction with firing No. 6 fuel oil. These two fields remain on until full No. 6 fuel oil flow is achieved. Then black liquor (BL) firing is begun while simultaneously reducing No. 6 fuel oil flow. The remaining ESP fields are energized simultaneously with the introduction of black liquor into the recovery boiler. This insures that the control equipment is operating prior to emissions being generated.

Shutdown

Shutdown requires approximately 4-8 hours. Excess emissions of PM, TRS, and VE may occur over an average period of 2 hours, 4-6 hours, and 2 hours, respectively. To minimize the duration and magnitude of excess emissions during shutdown, the following procedures are undertaken. No. 6 fuel oil is fired and the black liquor feed rate is decreased until only oil is fired. The ESP fields remain on until fuel firing has ceased and remains on approximately 12-24 hours after the shutdown cycle is complete. This minimizes emissions during shutdown.

ATTACHMENT JSF-EU2-J11

ALTERNATIVE METHODS OF OPERATION

ATTACHMENT JSF-EU2-J11**ALTERNATIVE METHODS OF OPERATION**No. 4 Recovery Boiler

The No. 4 Recovery Boiler may be operated under the Alternative Methods of Operation described below:

Alternative Method	Fuel Options	Design Heat Input Rate (MMBtu/hr)	Maximum Operating Rate
1	Black liquor solids (BLS) only (24-hr average).	852 ^a	137,500 lb/hr
2	No. 6 fuel oil only ^b (24-hr average).	852	2,981 barrels/day
3	Any combination of the alternative methods listed above.	Individual rates listed above.	Individual rates listed above.

^a Based on 6,200 Btu/lb.

^b Fuel oil may contain on-spec used oil.

EMISSION UNIT 3
NO. 5 RECOVERY BOILER

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <p style="text-align: center;">No. 5 Recovery Boiler</p>			
4. Emissions Unit Identification Number: [] No ID ID: 011 [] ID Unknown			
5. Emissions Unit Status Code: A	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 26	8. Acid Rain Unit? []
9. Emissions Unit Comment: (Limit to 500 Characters)			

Emissions Unit Control Equipment

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p> <p>Electrostatic Precipitator</p>
<p>2. Control Device or Method Code(s): 010</p>

Emissions Unit Details

<p>1. Package Unit:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">Manufacturer:</td> <td style="width: 50%; border: none;">Model Number:</td> </tr> </table>	Manufacturer:	Model Number:				
Manufacturer:	Model Number:					
<p>2. Generator Nameplate Rating: MW</p>						
<p>3. Incinerator Information:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%; border: none;">Dwell Temperature:</td> <td style="width: 40%; border: none;">°F</td> </tr> <tr> <td style="border: none;">Dwell Time:</td> <td style="border: none;">seconds</td> </tr> <tr> <td style="border: none;">Incinerator Afterburner Temperature:</td> <td style="border: none;">°F</td> </tr> </table>	Dwell Temperature:	°F	Dwell Time:	seconds	Incinerator Afterburner Temperature:	°F
Dwell Temperature:	°F					
Dwell Time:	seconds					
Incinerator Afterburner Temperature:	°F					

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	972	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	156,780 lb/hr BLS	
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	51 weeks/year	8,568 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p>Maximum heat input rate is based on 156,780 lb/hr BLS and 6,200 Btu/lb. Process capacity is based on the maximum BLS fired in the No. 5 Recovery Boiler. Smelt flow cannot be measured.</p>		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CFR 60.7 – Notification and Recordkeeping
40 CFR 60.8 – Performance Tests
40 CFR 60.11 – Compliance with Standards and Maintenance Requirements
40 CFR 60.12 – Circumvention
40 CFR 60.13 – Monitoring Requirements
40 CFR 60.19 – General Notification and Reporting Requirements
40 CFR 60.282(a)(1) – PM and VE Limit
40 CFR 60.283(a)(2) – TRS Limit-Straight
40 CFR 60.283(a)(3) – TRS Limit-Cross
40 CFR 60.284(a) – CMS
40 CFR 60.284(d)(1) – Excess Emissions
40 CFR 60.284(e) – Excess Emissions – Violations
40 CFR 60.285(a) – Test Methods and Procedures
40 CFR 60.285(b) – PM Standards Compliance
40 CFR 60.285(d) – TRS Standards Compliance
40 CFR 60.285(f) – Alternative Reference Methods
62-204.800(7)(b)35 – Adopted NSPS – Pulp and Paper Mills
62-296.404(5)(a) – CMS for TRS
62-296.404(5)(b) – TRS and O ₂ CMS
62-296.404(6)(a) – Quarterly Reporting Requirements - Report
62-296.404(6)(b) – Quarterly Reporting Requirements – File
62-297.401(1)(a) – EPA Method 1
62-297.401(2) – EPA Method 2
62-297.401(3) – EPA Method 3
62-297.401(4) – EPA Method 4
62-297.401(5) – EPA Method 5
62-297.401(9)(a) – EPA Method 9
62-297.401(16) – EPA Method 16
62-297.401(16)(a) – EPA Method 16A

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 011		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): No. 5 Recovery Boiler ESP North Stack; No. 5 Recovery Boiler ESP South Stack			
6. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 288 feet	7. Exit Diameter: 9 feet	
8. Exit Temperature: 426 °F	9. Actual Volumetric Flow Rate: 194,000 acfm	10. Water Vapor: 27 %	
11. Maximum Dry Standard Flow Rate: 110,498 dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Two identical stacks on No. 5 Recovery Boiler. Stack parameters are for each stack. Dry standard flow rate is corrected to 8% O₂. Stack parameters updated from recent stack test data. Flow rate calculated based on the ratio of maximum operating rate to actual operating rate.			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper & Wood Products Sulfate (Kraft) Pulping: Recovery Furnace/Indirect Contact Evaporator		
2. Source Classification Code (SCC): 3-07-001-10		3. SCC Units: Tons Air-Dried Unbleached Pulp
4. Maximum Hourly Rate: 62.712	5. Maximum Annual Rate: 537,316	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): The maximum hourly rate is based on permit limit of 156,780 lb/hr BLS (24-hr average) fed to No. 5 Recovery Boiler and 2,500 lb BLS/ton ADUP. Hours of operation limited to 8,568 hr/yr.		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): In-Process Fuel Use, Residual Oil: General		
2. Source Classification Code (SCC): 3-90-004-89		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 3	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
10. Maximum % Sulfur: 2.5	8. Maximum % Ash:	9. Million Btu per SCC Unit: 150
10. Segment Comment (limit to 200 characters): 8.3 gpm/gun x 6 guns x 60 min/hr = 3,000 gal/hr. Fuel oil may contain No. 6 fuel oil & on-spec used oil. It is burned for startup, shutdown, & malf. Consequently, an annual rate is not appropriate.		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	010		EL
PM ₁₀	010		NS
SO ₂			NS
NO _x			NS
CO			NS
VOC			NS
TRS			EL
HAPS			NS
H001			NS
H095			NS
H106			NS
H120			NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control:
3. Potential Emissions: 83.3 lb/hour 356.9 tons/year	4. Synthetically Limited? [<input checked="" type="checkbox"/>]
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.044 gr/dscf @ 8% O₂ Reference: 40 CFR 60.282(a)(1)(i)	7. Emissions Method Code: 5
8. Calculation of Emissions (limit to 600 characters): $475,000 \text{ acfm @ } 6.54\% \text{ O}_2 \times (21-6.54)/(21-8.0) \times (1-0.31) \times [528^\circ\text{R}/(411 + 460)^\circ\text{R}] =$ $220,995 \text{ dscfm @ } 8\% \text{ O}_2; 0.044 \text{ gr/dscf} \times 220,995 \text{ dscf/min} \times 60 \text{ min/hr} \div 7,000 \text{ gr/lb} =$ 83.3 lb/hr.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Synthetically limited by hours of operation to 8,568 hr/yr.	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.044 gr/dscf @ 8% O₂	4. Equivalent Allowable Emissions: 83.3 b/hour 356.9 tons/year
5. Method of Compliance (limit to 60 characters): Annual source test using EPA Method 5.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 40 CFR 60.282(a)(1)(i)	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: TRS		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 26.3 lb/hour 112.67 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 25 ppmvd @ 8% O₂ Reference: 40 CFR 60.283(a)(3)		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): Refer to permit limit (Permit No. 0890003-001-AV).			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emission factor corrected to 8% O₂. Synthetically limited by hours of operation to 8,568 hr/yr. Emissions based on worst case operation when operating in cross mode.			

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 25 ppmvd @ 8% O₂		4. Equivalent Allowable Emissions: 26.3 lb/hour 112.67 tons/year	
5. Method of Compliance (limit to 60 characters): TRS CEM			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Requested Allowable Emissions and Units corrected to 8% O₂ (cross mode). 40 CFR 60.283(a)(3) for Cross Recovery Furnace.			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: TRS	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour _____ tons/year _____	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters):	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 5 ppmvd @ 8% O₂	4. Equivalent Allowable Emissions: 5.26 lb/hour 22.53 tons/year
5. Method of Compliance (limit to 60 characters): TRS CEM	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Requested Allowable Emissions and Units corrected to 8% O₂ (straight mode). 40 CFR 60.283(a)(2) for Recovery Furnace operating in straight mode.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE35	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 35 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: EPA Method 9 annually.	
5. Visible Emissions Comment (limit to 200 characters): 40 CFR 60.282(a)(1)(ii)	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 2

1. Parameter Code: EM	2. Pollutant(s): TRS
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information: Manufacturer: STI, Inc. Model Number: Serial Number:	
5. Installation Date: Oct 1999	6. Performance Specification Test Date: Nov 1999
7. Continuous Monitor Comment (limit to 200 characters): 40 CFR 60.284(a)(2). SO₂ Analyzer – TECO 43C. O₂ Cell – 2FO Flue Gas CiTiceL.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 2 of 2

1. Parameter Code: VE	2. Pollutant(s):
3. CMS Requirement:	[<input checked="" type="checkbox"/>] Rule [] Other
4. Monitor Information: Manufacturer: See Comment Model Number: See Comment Serial Number: See Comment	
5. Installation Date: Aug 2000	6. Performance Specification Test Date: See Comment
7. Continuous Monitor Comment (limit to 200 characters): South – Land Combustion Model 4500 Mark II; North – Opacity Monitoring System 4500 S/N: 94488039. Performance Specification Test Date: South – Sep2000; North: 21/MAR/1995. 40 CFR 60.284(a)(1).	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: <u>JSF-EU2-J1</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [X] Attached, Document ID: <u>JSF-EU3-J2</u> [] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: <u>JSF-EU3-J3</u> [] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [X] Attached, Document ID: <u>JSF-EU3-J4</u> [] Not Applicable [] Waiver Requested
5. Compliance Test Report [] Attached, Document ID: _____ [] Previously submitted, Date: _____ [X] Not Applicable
6. Procedures for Startup and Shutdown [X] Attached, Document ID: <u>JSF-EU3-J6</u> [] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [] Attached, Document ID: _____ [X] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU3-J11</u> [<input type="checkbox"/>] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [<input type="checkbox"/>] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable
13. Identification of Additional Applicable Requirements <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU3-J13</u> [<input type="checkbox"/>] Not Applicable
14. Compliance Assurance Monitoring Plan [<input type="checkbox"/>] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [<input type="checkbox"/>] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [<input type="checkbox"/>] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [<input type="checkbox"/>] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [<input type="checkbox"/>] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [<input type="checkbox"/>] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [<input type="checkbox"/>] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT JSF-EU3-J2
FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT JSF-EU3-J2**FUEL ANALYSIS
NO. 5 RECOVERY BOILER**

Fuel	Density (lb/gal)	Moisture (%)	Weight % Sulfur	Weight % Nitrogen	Weight % Ash	Heat Capacity
Black Liquor Solids	12	35	--	--	--	5,000-6,300 Btu/lb
No. 6 Fuel Oil ^a	8.33	--	2.5	--	0.1	145,000-150,000 Btu/gal

^a Fuel oil may contain on-spec used oil.

ATTACHMENT JSF-EU3-J3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT JSF-EU3-J3

CONTROL EQUIPMENT PARAMETERS

N0. 5 RECOVERY BOILER ELECTROSTATIC PRECIPITATOR

Manufacturer and Model No.	<u>Environmental Elements</u>		
Date of Installation	1978		
Inlet Gas Temperature	420 °F		
Inlet Gas Flow Rate	475,000 acfm		
Primary Voltage	440 kV		
Secondary Voltage	1,500 kV		
Primary Current	290 Amps		
Secondary Current	55 mAmps		
Spark Rate	10-60 per minute		
Pressure Drop	-3 inches of H ₂ O		
Maximum Permitted Particulate Matter Emissions *	83.3 lb/hr		
Pollutants	Inlet Loading	Outlet Loading	Control Efficiency
Particulate Matter	4.4 gr/dscf @ 8% O ₂	0.044 gr/dscf @ 8% O ₂	99%

* Values obtained from Permit No. 0890003-001-AV. Source has two stacks (north and south).

ATTACHMENT JSF-EU3-J4
DESCRIPTION OF STACK SAMPLING FACILITIES

ATTACHMENT JSF-EU3-J4**DESCRIPTION OF STACK SAMPLING FACILITY
NO. 5 RECOVERY BOILER**

The following is a description of the No. 5 Recovery Boiler stack sampling facilities [as required per Rule 62-297.310(6)].

Sampling ports

1. All sampling ports have an inside diameter of approximately 4 inches.
2. The ports are capable of being sealed when not in use.
3. The sampling ports are located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. A complete application to construct for the No. 5 Recovery Boiler was filed prior to December 1, 1980; therefore, at least two sampling ports, 90 degrees apart, are installed at each sampling location on this circular stack (outside diameter of 15 feet or less).

Work platforms

1. The working platform is approximately 50 square feet in area and approximately 5 feet wide.
2. This circular stack has two sampling ports; therefore, the work platform extends approximately 360 degrees around the stack.
3. The platform is equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor opening cover if ladder access is used to reach the platform.

Means of access

1. The ladder to the work platform is approximately 12 feet in length.
2. Walkways over free fall areas are equipped with safety rails and toeboards.

Equipment support structures

1. An eyebolt and angle bracket is attached directly above each port on this vertical stack. The eyebolt is capable of supporting a 500-lb working load.

ATTACHMENT JSF-EU3-J6
PROCEDURES FOR STARTUP AND SHUTDOWN

ATTACHMENT JSF-EU3-J6**STARTUP AND SHUTDOWN PROCEDURE**

No. 5 Recovery Boiler with electrostatic precipitator (ESP).

Startup

Startup requires approximately 6-12 hours. Excess emissions of PM, TRS, and VE may occur over an average period of 2 hours, 4-6 hours, and 2 hours, respectively. To minimize the duration and magnitude of excess emissions during startup, the following procedures are undertaken. Typically, two ESP fields are energized in conjunction with firing No. 6 fuel oil. These two fields remain on until full No. 6 fuel oil flow is achieved. Then black liquor (BL) firing is begun while simultaneously reducing No. 6 fuel oil flow. The remaining ESP fields are energized simultaneously with the introduction of black liquor into the recovery boiler. This insures that the control equipment is operating prior to emissions being generated.

Shutdown

Shutdown requires approximately 4-8 hours. Excess emissions of PM, TRS, and VE may occur over an average period of 2 hours, 4-6 hours, and 2 hours, respectively. To minimize the duration and magnitude of excess emissions during shutdown, the following procedures are undertaken. No. 6 fuel oil is fired and the black liquor feed rate is decreased until only oil is fired. The ESP fields remain on until fuel firing has ceased and remains on approximately 12-24 hours after the shutdown cycle is complete. This minimizes emissions during shutdown.

ATTACHMENT JSF-EU3-J11
ALTERNATIVE METHODS OF OPERATION

ATTACHMENT JSF-EU3-J11

ALTERNATIVE METHODS OF OPERATION

No. 5 Recovery Boiler

The No. 5 Recovery Boiler may be operated under three Alternative Methods of Operation as described below:

Alternative Method	Fuel Options	Design Heat Input Rate (MMBtu/hr)	Maximum Operating Rate
1	Black liquor solids (BLS) only (24-hr average).	972 ^a	156,780 lb/hr
2	No. 6 fuel oil only ^b (24-hr average).	972	3,012 barrels/day
3	Any combination of BLS and No. 6 fuel oil.	Individual rates listed above.	Individual rates listed above.

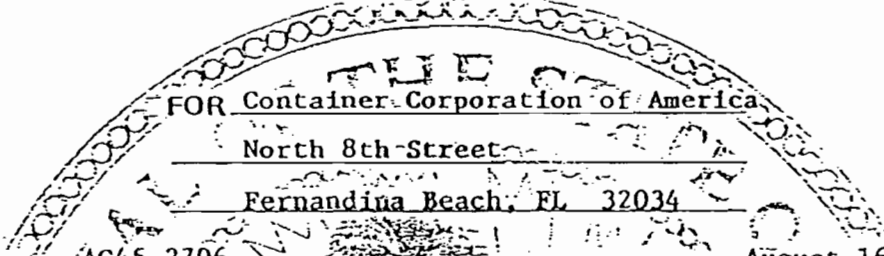
^a Based on 6,200 Btu/lb (BLS).

^b Fuel oil may contain on-spec used oil.

ATTACHMENT JSF-EU3-J13

IDENTIFICATION OF ADDITIONAL APPLICABLE REQUIREMENTS

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION CONSTRUCTION PERMIT



FOR Container Corporation of America

North 8th Street

Fernandina Beach, FL 32034

PERMIT NO. AC45-2706

DATE OF ISSUE August 16, 1977

PURSUANT TO THE PROVISIONS OF SECTIONS 403.061 (16) AND 403.707 OF CHAPTER 403 FLORIDA STATUTES AND CHAPTERS 17-4 AND 17-7 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:

George H. Whiteside, Vice President and Division General Manager

FOR THE CONSTRUCTION OF THE FOLLOWING:

No. 5 Recovery Boiler (RB) for Cross-Recovery Process with an

Electrostatic Precipitator for Particulate Control and "Low Odor"

Design for TRS Control and Its Smelt Dissolving Tank with Wet Scrubber
for Particulate Control.

LOCATED AT N. 8th Street, Fernandina Beach, Nassau County, FL

UTM: E-356, 638 N-2,308,077

IN ACCORDANCE WITH THE APPLICATION DATED May 21, 1976

ANY CONDITIONS OR PROVISOS WHICH ARE ATTACHED HERETO ARE INCORPORATED INTO AND MADE A PART OF THIS PERMIT AS THOUGH FULLY SET FORTH HEREIN. FAILURE TO COMPLY WITH SAID CONDITIONS OR PROVISOS SHALL CONSTITUTE A VIOLATION OF THIS PERMIT AND SHALL SUBJECT THE APPLICANT TO SUCH CIVIL AND CRIMINAL PENALTIES AS PROVIDED BY LAW.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ISSUE UNTIL October 31, 1979

OR UNLESS REVOKED OR SURRENDERED AND SHALL BE SUBJECT TO ALL LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.

Frank Watkins, Jr.

Frank Watkins, Jr.
Subdistrict Engineer

Joseph W. Landers, Jr.

JOSEPH W. LANDERS, JR.
SECRETARY

for

G. Doug Dutton
Subdistrict Manager
G. Doug Dutton

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC45-2706

Date: Aug. 16, 1977

- (X) 1. Construction of this installation shall be completed by December 31, 1978. Application for Permit to Operate to be submitted by August 3, 1979.
- (X) 2. This construction permit expires on October 31, 1979 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Department of Environmental Regulation Commission.
- (X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- (X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Environmental Regulation for consideration toward the issuance of an operation permit.
- (X) 5. This RB & SDT shall be tested* for particulate (RB & SDT) and TRS(RB)* within 180 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the Florida Department of Environmental Regulation, 3426 Bills Road, Jacksonville, FL 32207

* Fuel Analysis May be Submitted for Required Sulfur Dioxide Emission Test.

- () 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9-Visible Determination of the Opacity of Emissions from Stationary Sources (36FR24895; Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the Department of Environmental Regulation District Office, _____
- (X) 7. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.
- () 8. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- () 9. All fugitive dust generated at this site shall be adequately controlled.

- (X) 10. The TRS compliance test report shall contain all data necessary to determine compliance with the limitation declared by the Secretary on July 8, 1977 which is "Total Reduced Sulfur - 5 ppm as a monthly geometric mean (based on six 4-hour averages per day) with a limit of 20 ppm (4-hour average) not to be exceeded more than 5% of the time."

EMISSION UNIT 4

NO. 4 SMELT DISSOLVING TANK

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <p style="text-align: center;">No. 4 Smelt Dissolving Tank</p>			
4. Emissions Unit Identification Number: [] No ID ID: 013 [] ID Unknown			
5. Emissions Unit Status Code: A	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 26	8. Acid Rain Unit? []
9. Emissions Unit Comment: (Limit to 500 Characters) 			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Venturi Scrubber

2. Control Device or Method Code(s): **53**

Emissions Unit Details

1. Package Unit:		
Manufacturer:		Model Number:
2. Generator Nameplate Rating:		
		MW
3. Incinerator Information:		
	Dwell Temperature:	°F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	137,500 lb/hr BLS	
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
	Maximum process rate is 24-hr average. BLS = Black Liquor Solids. Smelt flow cannot be measured.	

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-296.320(4)(a)2 – PM Limit
62-296.320(4)(a)3.a(ii) – PM Test Methods for Sources with Scrubbers
62-296.320(4)(a)3.c. – Emissions Monitoring
62-296.320(4)(b) – VE Standard
62-296.404(2)(b) – VE Exemption
62-296.404(3)(d) – TRS Limit
62-296.404(4)(c)1. – Test Methods – Smelt Dissolving Tanks – PM
62-296.404(4)(c)3. - Test Methods – Smelt Dissolving Tanks – TRS
62-296.404(4)(f) – Emissions Monitoring
62-296.404(5)(d) – Surrogate
62-296.404(6)(a) – Quarterly Reporting Requirements - Report
62-296.404(6)(b) – Quarterly Reporting Requirements - File
62-296.404(6)(c)3. – Excess Emissions – Non-NSPS TRS
62-296.404(6)(c)4. – Excess Emissions – Good Air Pollution Control Practices
62-296.404(6)(d) – Excess Emissions – Notification
62-297.310 – General Compliance Test Requirements
62-297.401(1)(a) – EPA Method 1
62-297.401(2) – EPA Method 2
62-297.401(3) – EPA Method 3
62-297.401(4) – EPA Method 4
62-297.401(5) – EPA Method 5
62-297.401(9)(a) – EPA Method 9
62-297.401(16) – EPA Method 16
62-297.401(16)(a) – EPA Method 16A

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 013		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
7. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 249 feet	7. Exit Diameter: 6 feet	
8. Exit Temperature: 143 °F	9. Actual Volumetric Flow Rate: 23,000 acfm	10. Water Vapor: 20 %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): <p>Stack parameters updated from recent stack test data. Flow rate calculated based on the ratio of maximum operating rate to actual operating rate during stack test.</p>			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products: Sulfate (Kraft) Pulping: Smelt Dissolving Tank; General		
2. Source Classification Code (SCC): 3-07-001-05		3. SCC Units: Tons Air-Dried Unbleached Pulp
4. Maximum Hourly Rate: 55	5. Maximum Annual Rate: 481,800	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum hourly rate is based on 137,500 lb/hr BLS (24-hr average) fed to No. 4 Recovery Boiler and 2,500 lb BLS/ton ADUP.		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
11. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	053		EL
PM ₁₀	053		NS
NO _x			NS
VOC			NS
TRS	053		EL
HAPS			NS
H106			NS
H115			NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 28.5 lb/hour 124.83 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: E = 3.59 P^{0.62} Reference: 62-296.320(4)(a)2.		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): Process Weight Formula, E = 3.59 P^{0.62}, where P = process weight; 3.59 x (28.26)^{0.62} = 28.50 lb/hr.			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emissions based on Process Weight Formula.			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: E = 3.59 P^{0.62}		4. Equivalent Allowable Emissions: 28.5 lb/hour 124.83 tons/year	
5. Method of Compliance (limit to 60 characters): Annual stack testing using EPA Method 5.			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-296.320(4)(a)2.			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: TRS		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 2.2 lb/hour 9.64 tons/year		4. Synthetically Limited? <input type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: 0.048 lb TRS/3000 lb BLS Reference: 62-296.404(3)(d)1.		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): 137,500 lb/hr BLS x 0.048 lb TRS/3000 lb BLS = 2.20 lb/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.048 lb TRS/3000 lb BLS		4. Equivalent Allowable Emissions: 2.2 lb/hour 9.64 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Method 16 or 16A			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-296.404(3)(d)1.			

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: EPA Method 9.	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.404(2)(b). VE limit effective only if VE measurement can be made without being substantially affected by plume mixing or moisture condensation. If DEP observes VE >20% opacity, then a special compliance test may be required.	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 1

1. Parameter Code: FLOW	2. Pollutant(s):
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Fisher Porter Model Number: 75DM14PL/9AW/12KA Serial Number: 8810AO639A4	
5. Installation Date: 01 FEB 1989	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Rule 62-296.404(5)(d). CMS monitors weak wash flow rate to the scrubber.	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: <u>JSF-EU2-J1</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: <u>JSF-EU4-J3</u> [] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [X] Attached, Document ID: <u>JSF-EU4-J4</u> [] Not Applicable [] Waiver Requested
5. Compliance Test Report [] Attached, Document ID: _____ [] Previously submitted, Date: _____ [X] Not Applicable
6. Procedures for Startup and Shutdown [X] Attached, Document ID: <u>JSF-EU4-J6</u> [] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [] Attached, Document ID: _____ [X] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

<p>11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>13. Identification of Additional Applicable Requirements <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU4-J13</u> <input type="checkbox"/> Not Applicable</p>
<p>14. Compliance Assurance Monitoring Plan <input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u> <input type="checkbox"/> Not Applicable</p>
<p>15. Acid Rain Part Application (Hard-copy Required)</p> <p><input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____</p> <p><input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____</p> <p><input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____</p> <p><input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____</p> <p><input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____</p> <p><input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____</p> <p><input checked="" type="checkbox"/> Not Applicable</p>

ATTACHMENT JSF-EU4-J3
DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT JSF-EU4-J3

CONTROL EQUIPMENT PARAMETERS

NO. 4 SMELT DISSOLVING TANK SCRUBBER (VENTURI)

Manufacturer and Model No.	<u>Air Pollution, Inc.</u>		
Date of Installation	<u>February 1989</u>		
Inlet Gas Temperature	<u>165</u>		°F
Inlet Gas Flow Rate	<u>50,000</u>		acfm
Outlet Gas Temperature	<u>143</u>		°F
Outlet Gas Flow Rate	<u>23,000</u>		acfm
Pressure Drop Across Device	<u>10</u>		inches of H ₂ O
Scrubbing Media	<u>Weak Wash (Caustic)</u>		
Scrubbing Media Flow Rate (Minimum as 12-hr average)	<u>68</u>		gpm
Scrubbing Media Supply Pressure – Normal	<u>3</u>		psig
Average Scrubbing Media pH	<u>11</u>		pH units
Maximum Permitted Particulate Matter Emissions*	<u>28.50</u>		lb/hr
Maximum Permitted Total Reduced Sulfur Emissions*	<u>2.2</u>		lb/hr
<u>Pollutants</u>	<u>Inlet Loading</u>	<u>Outlet Loading</u>	<u>Control Efficiency</u>
Particulate Matter	407.0 lb/hr	28.50 lb/hr	93 %
Total Reduced Sulfur	22 lb/hr	2.20 lb/hr	90 %

*Values obtained from Permit AC45-141875.

Note: Outlet flow rate and temperature updated from stack test data.

ATTACHMENT JSF-EU4-J4
DESCRIPTION OF STACK SAMPLING FACILITIES

ATTACHMENT JSF-EU4-J4**DESCRIPTION OF STACK SAMPLING FACILITY****NO. 4 SMELT DISSOLVING TANK**

The following is a description of the No. 4 Smelt Dissolving Tank stack sampling facilities [as required per Rule 62-297.310(6)].

Sampling ports

1. All sampling ports have an inside diameter of approximately 4 inches.
2. The ports are capable of being sealed when not in use.
3. The sampling ports are located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. A complete application to construct for the No. 4 Smelt Dissolving Tank was filed prior to December 1, 1980; therefore, at least two sampling ports, 90 degrees apart, are installed at each sampling location on this circular stack (outside diameter of 15 feet or less).

Work platforms

1. The working platform is approximately 70 square feet in area and approximately 5 feet wide.
2. This circular stack has two sampling ports; therefore, the work platform extends approximately 200 degrees around the stack.
3. The platform is equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor opening cover if ladder access is used to reach the platform.

Means of access

1. Ladders to the work platform are less than 15 feet in length.
2. Walkways over free fall areas are equipped with safety rails and toeboards.

Equipment support structures

1. An eyebolt and angle bracket is attached directly above each port on this vertical stack. The eyebolt is capable of supporting a 500 pound working load.

ATTACHMENT JSF-EU4-J6
PROCEDURES FOR STARTUP AND SHUTDOWN

ATTACHMENT JSF-EU4-J6**STARTUP AND SHUTDOWN PROCEDURE**

No. 4 Smelt Dissolving Tank with venturi scrubber.

Startup

Startup requires approximately 15 minutes. Excess emissions of PM and TRS may occur over an average period of 2 hours, respectively. To minimize the duration and magnitude of excess emissions during startup, the following procedures are undertaken:

- The dissolving tank scrubber system is turned on prior to the recovery boiler coming on line and firing black liquor. Consequently, the scrubber is on before any smelt enters the smelt dissolving tank. This insures that once smelt is generated in the recovery boiler, the scrubber is operating to capture emissions.

Shutdown

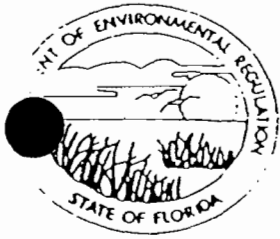
Shutdown requires approximately 4-8 hours. Excess emissions of PM and TRS may occur over an average period of 2-6 hours, respectively. To minimize the duration and magnitude of excess emissions during shutdown, the following procedure is undertaken:

- The scrubber remains on until all smelting has ceased.

ATTACHMENT JSF-EU4-J13

IDENTIFICATION OF ADDITIONAL APPLICABLE REQUIREMENTS

bcc: CL Hardy (original for file)
RC Cobb - Clayton Legal
RH Williams - Jacksonville
RL Caffo
RP Hagan



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

May 26, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul J. Magnell
General Manager
Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

FERNANDINA MILLS
JUN 2 1988
RECEIVED

Dear Mr. Magnell:

Re: Amendments to Construction Permits
AC 45-141871, -141872, -141874, and -141875

The Department received your letter dated May 2, 1988, requesting that the above referenced permits be amended to incorporate specific conditions that have been recently agreed to with other pulp and paper mills.

A. For the digester systems, the following will be changed:

1. AC 45-141871: Kamyrr Digester System

Specific Condition

No. 2:

From: The maximum production rate of the Kamyrr digester system shall not exceed 85 tons per hour of air dried pulp and based on a nominal utilization rate of 300,104 lbs/hr wood chips (dry) and 1,573,191 lbs/hr black/white liquor. For PSD purposes, the maximum production rate shall not exceed 1819 TPD ADP.

To: For testing purposes and NSPS applicability purposes, the maximum production rate of the Kamyrr digester system will be 85 TPH ADP (tons per hour of air-dried pulp). Tests for compliance will be performed with the control device (No. 4 lime kiln) operating at 90-100% of the maximum rate and with the Kamyrr digester system operating as near the maximum production rate as possible, but no less than 85% of the maximum rate. For PSD purposes, the maximum production rate

Mr. Paul J. Magnell
Page Two
May 26, 1988

of the Kamyr digester system will be 1,819 TPD ADP (tons per day of air dried pulp; based on a nominal utilization rate of 3,210 TPD of wood chips (dry) and 12,830 TPD of cooking liquor (dry)).

2. AC 45-141872: Batch Digester System

Specific Condition

No. 2:

From: The maximum production rate of the batch digester system shall not exceed 101.5 tons per hour of air dried pulp and based on a nominal utilization rate of 392,305 lbs/hr wood chips (dry) and 819,918 lbs/hr of black/white liquor. For PSD purposes, the maximum production rate shall not exceed 1391 TPD ADP.

To: For testing purposes and NSPS applicability purposes, the maximum production rate of the batch digester system will be 101.5 TPH ADP (tons per hour of air dried pulp). Tests for compliance will be performed with the control device (No. 4 lime kiln) operating at 90-100% of the maximum rate and with the batch digester system operating as near the maximum production rate as possible, but no less than 85% of the maximum rate. For PSD purposes, the maximum production rate of the batch digester system will be 1,391 TPD ADP (tons per day of air dried pulp; based on a nominal utilization rate of 2,690 TPD of wood chips (dry) and 5,620 TPD of cooking liquor (dry)).

B. Due to the refinement of some Specific Conditions associated with TRS source permitting and a phone conversation with Mr. Roger Hagan on May 20, 1988, the following will be changed:

1. AC 45-141874: Tall Oil Plant and Control System

Specific Condition

No. 6:

From: The permittee shall provide proof of final compliance to the DER's Northeast District office by May 12, 1989, pursuant to FAC Rule 17-2.960(1)(d)1.b.

Mr. Paul J. Magnell
Page Three
May 26, 1988

To: Pursuant to FAC Rule 17-2.960(1), the Tall Oil Plant shall be in final compliance by May 12, 1989, and the permittee shall provide proof of final compliance to the DER's Northeast District office by June 26, 1989.

2. AC 45-141875: No. 4 Smelt Dissolving Tank

Specific Condition

No. 7:

From: The permittee shall provide proof of compliance with FAC Rule 17-2.960(1), by May 12, 1989, to the DER's Northeast District office.

To: Pursuant to FAC Rule 17-2.960(1), the No. 4 SDT shall be in final compliance by May 12, 1989, and the permittee shall provide proof of final compliance to the DER's Northeast District office by June 26, 1989.

C. Since a major modification initiates new source review pursuant to FAC Rules 17-2.500 and 17-2.510 if a pollutant exceeds the significant level contained in FAC Rule 17-2, Table 500-2, then this threshold level, which for TRS is 10 TPY, will be compared to the source's annual allowable TRS emission limit to determine the necessity for requiring annual compliance testing for TRS mass emissions. If the allowable TRS emission limit is greater than 10 TPY, an annual compliance test is required. Therefore, the following will be changed:

1. AC 45-141874: Tall Oil Plant and Control System

Specific Condition

No. 4:

From: Initial and annual compliance tests shall be conducted using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

To: An initial compliance test shall be conducted using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Mr. Paul J. Magnell
Page Four
May 26, 1988

2. AC 45-141875: No. 4 Smelt Dissolving Tank

Specific Condition

No. 6:

From: Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:

- a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources
- b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources
- c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

To: a. Initial and annual compliance tests for PM and visible emissions shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:

- 1) EPA Method 5, Determination of Particulate Emissions from Stationary Sources
- 2) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources

b. An initial compliance test for TRS shall be conducted using the following test method in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:

- 1) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

Attachment to be Incorporated:

A. AC 45-141871 and -141872

- 11. Mr. Paul J. Magnell's letter dated May 2, 1988, and received May 6, 1988.

Mr. Paul J. Magnell
Page Five
May 26, 1988

B. AC 45-141874

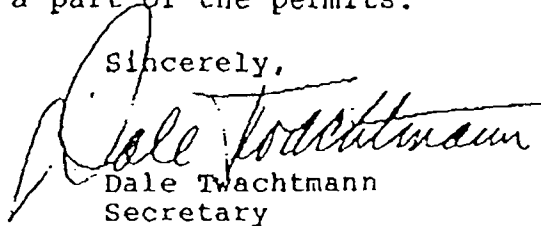
7. Mr. Paul J. Magnell's letter dated May 2, 1988, and received May 6, 1988.

C. AC 45-141875

8. Mr. Paul J. Magnell's letter dated May 2, 1988, and received May 6, 1988.

This letter must be attached to the appropriate construction permits and shall become a part of the permits.

Sincerely,



Dale Twachtmann
Secretary

DT/ks

cc: B. Stewart, NE District
B. Williams, JSC
R. Hagan, CCA
B. Pittman, Esq., DER

EmSOFT II
11/16/89

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

4/18/88

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

Permit Number: AC 45-141875
Expiration Date: September 24, 1989
County: Nassau
Latitude/Longitude: 30° 40' 53"N
81° 27' 26"W
Project: No. 4 Smelt Dissolving
Tank

This permit is issued under the provisions of Chapter 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:

For the permitting of the No. 4 Smelt Dissolving Tank (SDT) and the construction/installation of a new flooded elbow type venturi scrubber control system, which will replace the existing demister pad. The maximum total process input rate is 56,513 lbs/hr smelt (green liquor solids).

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Smelt Dissolving Tank 3-07-001-05

Construction will be in accordance with the permit application, plans, documents, and reference materials submitted unless otherwise stated in the General and Specific Conditions.

Attachments to be Incorporated:

1. Application to construct air pollution sources received November 12, 1987.
2. Mr. C. H. Fancy's letter dated December 10, 1987.
3. Mr. Paul J. Magnell's letter dated December 17, 1987, and received December 24, 1987.
4. Mr. Paul J. Magnell's letter dated January 15, 1988, and received January 19, 1988.
5. Technical Evaluation and Preliminary Determination dated March 1, 1988.
6. Mr. Paul J. Magnell's letter dated March 10, 1988, and received March 15, 1988.
7. Mr. Roger P. Hagan's letter dated March 25, 1988, and received April 1, 1988.

PERMITTEE:
Container Corporation of
America

Permit Number: AC 45-141875
Expiration Date: September 24, 1989

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 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, unless specifically authorized by an order from the Department.

PERMITTEE:
Container Corporation of
America

Permit Number: AC 45-141875
Expiration Date: September 24, 1989

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 of
America

Permit Number: AC 45-141875
Expiration Date: September 24, 1989

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 noncompliance 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)
- () 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 of
America

Permit Number: AC 45-141875
Expiration Date: September 24, 1989

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. The No. 4 Smelt Dissolving Tank (SDT) may operate continuously (i.e., 8760 hrs/yr).

2. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H_2S) shall not exceed 0.048 lb/3000 pounds black liquor solids (2.2 lbs/hr or 9.6 TPY and based on a permitted maximum processing capacity of 137,500 lbs/hr black liquor solids (BLS) in the No. 4 Recovery Boiler (RB) - equivalent to 56,513 lbs/hr green liquor solids (GLS)).

PERMITTEE:
Container Corporation of
America

Permit Number: AC 45-141875
Expiration Date: September 24, 1989

SPECIFIC CONDITIONS:

3. The maximum PM mass allowable emissions shall not exceed 28.5 lbs/hr or 122 TPY. These limits are based on the process capacity of 56,513 lbs/hr of GLS, and in accordance with Florida Administrative Code (FAC) Rule 17-2.610(1).

4. Visible emissions shall be less than 20% opacity in accordance with Rule 17-2.610(2), FAC.

5. Objectionable odors shall not be allowed off of plant property in accordance with Rule 17-2.620(2), FAC.

6. Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:

- a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources
- b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources
- c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

⑦ The permittee shall provide proof of compliance with FAC Rule 17-2.960(1), by May 12, 1989, to the DER's Northeast District office.

8. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

9. Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the No. 4 SDT is subject to the provisions of FAC Rules 17-2.710(3)(d), Establishing Specific Surrogate Parameters, and 17-2.710(4), Quarterly Reporting Requirements. The No. 4 SDT is subject to the provisions of FAC Rule 17-4.140, Reports.

10. The No. 4 SDT is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

PERMITTEE:
Container Corporation of
America

Permit Number: AC 45-141875
Expiration Date: September 24, 1989

SPECIFIC CONDITIONS:

11. The DER's Northeast District office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the NE District office within 45 days of test completion.


12. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the specific surrogate parameters to be monitored, and the Certificate of Completion, to the DER's Northeast District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. (FAC Rules 17-2 and 17-4)

If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease. (FAC Rule 17-4)

13. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to the DER's Bureau of Air Quality Management office and Northeast District office.

14. The No. 4 SDT is subject to the provisions of FAC Rule 17-2.971(2)(c), Compliance Schedules for Continuous Monitoring Requirements, which requires compliance by August 12, 1989.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary

Issued this 18 day of April,
1988.

EMISSION UNIT 5

NO. 5 SMELT DISSOLVING TANK

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION**(All Emissions Units)****Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
No. 5 Smelt Dissolving Tank			
4. Emissions Unit Identification Number: <input type="checkbox"/> No ID			
ID: 014 <input type="checkbox"/> ID Unknown			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		26	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			

Emissions Unit Control Equipment

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p> <p style="margin-left: 20px;">Venturi Scrubber</p>
<p>2. Control Device or Method Code(s): 53</p>

Emissions Unit Details

<p>1. Package Unit:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">Manufacturer:</td> <td style="width: 50%; border: none;">Model Number:</td> </tr> </table>	Manufacturer:	Model Number:				
Manufacturer:	Model Number:					
<p>2. Generator Nameplate Rating: MW</p>						
<p>3. Incinerator Information:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%; border: none;">Dwell Temperature:</td> <td style="width: 40%; border: none;">°F</td> </tr> <tr> <td style="border: none;">Dwell Time:</td> <td style="border: none;">seconds</td> </tr> <tr> <td style="border: none;">Incinerator Afterburner Temperature:</td> <td style="border: none;">°F</td> </tr> </table>	Dwell Temperature:	°F	Dwell Time:	seconds	Incinerator Afterburner Temperature:	°F
Dwell Temperature:	°F					
Dwell Time:	seconds					
Incinerator Afterburner Temperature:	°F					

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	156,780 lb/hr BLS	
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	51 weeks/year	8,568 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
	Maximum process rate is based on maximum black liquor solids fired in the No. 5 Recovery Boiler.	

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CFR 60.11(a) – Compliance with Standards and Maintenance Requirements
40 CFR 60.11(d) – Minimize Emissions
40 CFR 60.11(f) – Special Provisions
40 CFR 60.12 – Circumvention
40 CFR 60.13(a) – CMS
40 CFR 60.13(b) – Calibration Device
40 CFR 60.13(f) – Representative Measurements
40 CFR 60.13(i) – Monitoring Alternatives
40 CFR 60.19 – General Notification and Reporting Requirements
40 CFR 60.282(a)(2) – PM Limit – Straight
40 CFR 60.283(a)(4) – TRS Standard – Smelt Dissolving Tank
40 CFR 60.284(b)(2) – CMS for Lime Kiln or Smelt Dissolving Tank Using a Scrubber
40 CFR 60.285(a) – Test Methods and Procedures
40 CFR 60.285(c) – PM Standard Test Method
40 CFR 60.285(e) – TRS Standard Test Method
40 CFR 60.285(f) – Alternative Reference Methods
40 CFR 60.7 – Notification and Recordkeeping
40 CFR 60.8 – Performance Tests
62-204.800(7)(b)35. – Adopted NSPS – Pulp and Paper Mills
62-296.404(2)(b) – VE Exemption
62-296.404(5)(d) – Surrogate Parameters
62-296.404(6)(a) – Quarterly Reporting Requirements – Report
62-296.404(6)(b) – Quarterly Reporting Requirements – File
62-296.404(6)(c)4. – Excess Emissions – Good Air Pollution Control Practice
62-297.310 – General Compliance Test Requirements
62-297.401(1)(a) – EPA Method 1
62-297.401(2) – EPA Method 2
62-297.401(3) – EPA Method 3
62-297.401(4) – EPA Method 4
62-297.401(5) – EPA Method 5
62-296.401(9)(a) – EPA Method 9
62-297.401(16) – EPA Method 16
62-297.401(16)(a) – EPA Method 16A

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 014		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
8. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 288 feet	7. Exit Diameter: 4 feet	
8. Exit Temperature: 151 °F	9. Actual Volumetric Flow Rate: 34,000 acfm	10. Water Vapor: 25 %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Stack parameters updated from recent stack test data. Flow rate calculated based on the ratio of maximum operating rate to actual operating rate during stack test.			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products: Sulfate (Kraft) Pulping: Smelt Dissolving Tank; General		
2. Source Classification Code (SCC): 3-07-001-05		3. SCC Units: Tons Air-Dried Unbleached Pulp
4. Maximum Hourly Rate: 62.712	5. Maximum Annual Rate: 537,316	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): The maximum hourly rate is based on the permit limit of 156,780 lb/hr BLS (24-hr average) fed to No. 5 Recovery Boiler and 2,500 lb BLS/ton ADUP. Hours of operation limited to 8,568 hr/yr.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
12. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	053		EL
PM ₁₀	053		NS
NO _x			NS
VOC			NS
TRS	053		EL
HAPS			NS
H106			NS
H115			NS

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 15.68 lb/hour		4. Synthetically Limited? <input checked="" type="checkbox"/> [X]	
		67.17 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.2 lb/ton Reference: 40 CFR 60.282(a)(2)		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): 0.2 lb/ton BLS x 156,780 lb/hr BLS x ton/2000 lb = 15.68 lb/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emissions based on 156,780 lb/hr BLS input to No. 5 Recovery Boiler. Synthetically limited by hours of operation: 8,568 hr/yr.			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.2 lb/ton		4. Equivalent Allowable Emissions: 15.68 lb/hour 67.17 tons/year	
5. Method of Compliance (limit to 60 characters): Annual source test using EPA Method 5.			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 40 CFR 60.282(a)(2).			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: TRS		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 2.59 lb/hour 11.08 tons/year		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.033 lb/ton Reference: 40 CFR 60.283(a)(4)		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): 0.033 lb/ton BLS x 156,780 lb/hr BLS x ton/2000 lb = 2.59 lb/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Synthetically limited by hours of operation: 8,568 hr/yr.			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.033 lb/ton BLS		4. Equivalent Allowable Emissions: 2.59 lb/hour 11.08 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Method 16 or 16A.			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 40 CFR 60.283(a)(4).			

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: EPA Method 9.	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.404(2)(b). Due to moisture, annual VE testing is not required. However, a special compliance test may be required by the Department.	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 2

1. Parameter Code: Scrubber Pressure	2. Pollutant(s):
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Honeywell Model Number: STG140-EIG-0000 Serial Number: 902100773445065	
5. Installation Date: 01 FEB 1989	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): 40 CFR 60.284(b)(2)(ii). Measurement of scrubber liquid supply pressure.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 2 of 2

1. Parameter Code: PRS	2. Pollutant(s):
3. CMS Requirement:	[X] Rule [] Other
4. Monitor Information: Manufacturer: Honeywell ST3000 Smart XMTTR Model Number: See Comment Serial Number:	
5. Installation Date: 01 FEB 1989	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): STD 120-EIH-0000-MB,S2,SV,FIC 3-8139. 40 CFR 60.284(b)(2)(i). Delta P is pressure drop of the gas stream across the scrubber.	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: <u>JSF-EU2-J1</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: <u>JSF-EU5-J3</u> [] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [X] Attached, Document ID: <u>JSF-EU5-J4</u> [] Not Applicable [] Waiver Requested
5. Compliance Test Report [] Attached, Document ID: _____ [] Previously submitted, Date: _____ [X] Not Applicable
6. Procedures for Startup and Shutdown [X] Attached, Document ID: <u>JSF-EU5-J6</u> [] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [] Attached, Document ID: _____ [X] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU5-J13</u> <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u> <input type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT JSF-EU5-J3
DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT JSF-EU5-J3

CONTROL EQUIPMENT PARAMETERS

NO. 5 SMELT DISSOLVING TANK SCRUBBER (VENTURI)

Manufacturer and Model No.	<u>Air Pollution, Inc.</u>		
Date of Installation	<u>February 1989</u>		
Inlet Gas Temperature	<u>165</u>		°F
Inlet Gas Flow Rate	<u>50,000</u>		acfm
Outlet Gas Temperature	<u>151</u>		°F
Outlet Gas Flow Rate	<u>34,000</u>		acfm
Pressure Drop Across Device	<u>10.00</u>		inches of H ₂ O
Scrubbing Media	<u>Weak Wash (Caustic)</u>		
Scrubbing Media Flow Rate	<u>325</u>		gpm
Scrubbing Media Supply Pressure – Normal	<u>3</u>		psig
Average Scrubbing Media pH	<u>11</u>		pH units
Maximum Permitted Particulate Matter Emissions*	<u>15.68</u>		lb/hr
Maximum Permitted Total Reduced Sulfur Emissions*	<u>2.59</u>		lb/hr
<u>Pollutants</u>	<u>Inlet Loading</u>	<u>Outlet Loading</u>	<u>Control Efficiency</u>
Particulate Matter	224 lb/hr	15.68 lb/hr	93 %
Total Reduced Sulfur	259 lb/hr	2.59 lb/hr	99 %

*Values obtained from Permit No. 0890003-001-AV.

Note: Outlet flow rate and temperature updated from recent stack test data.

ATTACHMENT JSF-EU5-J4
DESCRIPTION OF STACK SAMPLING FACILITIES

ATTACHMENT JSF-EU5-J4**DESCRIPTION OF STACK SAMPLING FACILITY****NO. 5 SMELT DISSOLVING TANK**

The following is a description of the No. 5 Smelt Dissolving Tank stack sampling facilities [as required per Rule 62-297.310(6)].

Sampling ports

1. All sampling ports have an inside diameter of approximately 3.5 inches.
2. The ports are capable of being sealed when not in use.
3. The sampling ports are located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. A complete application to construct for the No. 5 Smelt Dissolving Tank was filed prior to December 1, 1980; therefore, at least two sampling ports, 90 degrees apart, are installed at each sampling location on this circular stack (outside diameter of 15 feet or less).

Work platforms

1. The working platform is approximately 50 square feet in area and approximately 5 feet wide.
2. This circular stack has two sampling ports; therefore, the work platform extends approximately 200 degrees around the stack.
3. The platform is equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor opening cover if ladder access is used to reach the platform.

Means of access

1. Ladders to the work platform are less than 15 feet in length.
2. Walkways over free fall areas are equipped with safety rails and toeboards.

Equipment support structures

1. An eyebolt and angle bracket is attached directly above each port on this vertical stack. The eyebolt is capable of supporting a 500 pound working load.

ATTACHMENT JSF-EU5-J6
PROCEDURES FOR STARTUP AND SHUTDOWN

ATTACHMENT JSF-EU5-J6**STARTUP AND SHUTDOWN PROCEDURES**

No. 5 Smelt Dissolving Tank with wet scrubber.

Startup

Startup requires approximately 15 minutes. Excess emissions of PM and TRS may occur over an average period of 2 hours, respectively. To minimize the duration and magnitude of excess emissions during startup, the following procedures are undertaken:

- The dissolving tank scrubber system is turned on prior to the recovery boiler coming on line and firing black liquor. Consequently, the scrubber is on before any smelt enters the smelt dissolving tank. This insures that once smelt is generated in the recovery boiler, the scrubber is operating to capture emissions.

Shutdown

Shutdown requires approximately 4-8 hours. Excess emissions of PM and TRS may occur over an average period of 2-6 hours, respectively. To minimize the duration and magnitude of excess emissions during shutdown, the following procedure is undertaken:

- The scrubber remains on until all smelting has ceased.

ATTACHMENT JSF-EU5-J13

IDENTIFICATION OF ADDITIONAL APPLICABLE REQUIREMENTS

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION CONSTRUCTION PERMIT

FOR Container Corporation of America

North 8th Street

Fernandina Beach, FL 32034

PERMIT NO. AC45-2706 DATE OF ISSUE August 16, 1977

PURSUANT TO THE PROVISIONS OF SECTIONS 403.061 (16) AND 403.707 OF CHAPTER 403 FLORIDA STATUTES AND CHAPTERS 17-4 AND 17-7 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:

George H. Whiteside, Vice President and Division General Manager

FOR THE CONSTRUCTION OF THE FOLLOWING:

No. 5 Recovery Boiler (RB) for Cross-Recovery Process with an

Electrostatic Precipitator for Particulate Control and "Low Odor"

Design for TRS Control and It's Smelt Dissolving Tank with Wet Scrubber
for Particulate Control.

LOCATED AT N. 8th Street, Fernandina Beach, Nassau County, FL

UTM: E-356, 638 N-2,308,077

IN ACCORDANCE WITH THE APPLICATION DATED May 21, 1976

ANY CONDITIONS OR PROVISOS WHICH ARE ATTACHED HERETO ARE INCORPORATED INTO AND MADE A PART OF THIS PERMIT AS THOUGH FULLY SET FORTH HEREIN. FAILURE TO COMPLY WITH SAID CONDITIONS OR PROVISOS SHALL CONSTITUTE A VIOLATION OF THIS PERMIT AND SHALL SUBJECT THE APPLICANT TO SUCH CIVIL AND CRIMINAL PENALTIES AS PROVIDED BY LAW.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ISSUE UNTIL October 31, 1979

OR UNLESS REVOKED OR SURRENDERED AND SHALL BE SUBJECT TO ALL LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.

Frank Watkins, Jr.
Frank Watkins, Jr.
Subdistrict Engineer

Joseph W. Landers, Jr.
JOSEPH W. LANDERS, JR.
SECRETARY
for G. Doug Dutton
Subdistrict Manager
G. Doug Dutton

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC45-2706

Date: Aug. 16, 1977

- (X) 1. Construction of this installation shall be completed by December 31, 1978. Application for Permit to Operate to be submitted by August 3, 1979.
- (X) 2. This construction permit expires on October 31, 1979 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Department of Environmental Regulation Commission.
- (X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- (X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Environmental Regulation for consideration toward the issuance of an operation permit.
5. This RB & SDT shall be tested* for particulate (RB & SDT) and TRS(RB)* within 180 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the Florida Department of Environmental Regulation, 3426 Bills Road, Jacksonville, FL 32207
-
- * Fuel Analysis May be Submitted for Required Sulfur Dioxide Emission Test.
- () 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9-Visible Determination of the Opacity of Emissions from Stationary Sources (36FR24895; Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the Department of Environmental Regulation District Office, _____
-
- (X) 7. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.
- () 8. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- (X) 9. All fugitive dust generated at this site shall be adequately controlled.

- (X) 10. The TRS compliance test report shall contain all data necessary to determine compliance with the limitation declared by the Secretary on July 8, 1977 which is "Total Reduced Sulfur - 5 ppm as a monthly geometric mean (based on six 4-hour averages per day) with a limit of 20 ppm (4-hour average) not to be exceeded more than 5% of the time."

EMISSION UNIT 6
NO. 7 POWER BOILER

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
No. 7 Power Boiler with Coal and Ash Handling System			
4. Emissions Unit Identification Number:			
ID: 015		<input type="checkbox"/> No ID	<input type="checkbox"/> ID Unknown
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		26	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Consists of the No. 7 Power Boiler, Coal Handling System, and Ash Handling System. No. 7 Power Boiler is primarily fired with coal.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Electrostatic Precipitator

Dust Suppression by Water Sprays

Dust Suppression by Chemical Stabilizers or Wetting Agents

2. Control Device or Method Code(s): **010, 061, 062**

Emissions Unit Details

1. Package Unit:		
Manufacturer:		Model Number:
2. Generator Nameplate Rating: MW		
3. Incinerator Information:		
	Dwell Temperature:	°F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	1,021	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:	825,000 lb/hr steam	
5. Requested Maximum Operating Schedule:		
	24	7
	hours/day	days/week
	52	8,760
	weeks/year	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p>Maximum heat input rate is a 24-hr average. Maximum steam production is a 24-hr average, at 825°F and 850 psig.</p>		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CFR 60.11 – NSPS General Provisions	62-297.401(2)
40 CFR 60.12	62-297.401(3)
40 CFR 60.13(a)	62-297.401(4)
40 CFR 60.13(b)	62-297.401(5)
40 CFR 60.13(c)	62-297.401(6)
40 CFR 60.13(d)(2)	62-297.401(7)
40 CFR 60.13(e)(1)	62-297.401(9)(a)
40 CFR 60.13(f)	
40 CFR 60.13(h)	
40 CFR 60.19	
40 CFR 60.42(a) – NSPS Subpart D	
40 CFR 60.43(a)(2)	
40 CFR 60.43(b)	
40 CFR 60.43(c)	
40 CFR 60.44(a)(3)	
40 CFR 60.44(b)	
40 CFR 60.45(a)	
40 CFR 60.45(b)(2)	
40 CFR 60.45(b)(3)	
40 CFR 60.45(b)(4)	
40 CFR 60.45(c)	
40 CFR 60.45(e)	
40 CFR 60.45(f)	
40 CFR 60.45(g)(1)	
40 CFR 60.46(a)	
40 CFR 60.46(b)	
40 CFR 60.46(c)	
40 CFR 60.46(d)	
40 CFR 60.7	
40 CFR 60.8	
62-297.310	
62-297.401(1)(a)	

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 015		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
9. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 340 feet	7. Exit Diameter: 14.8 feet	
8. Exit Temperature: 385 °F	9. Actual Volumetric Flow Rate: 434,000 acfm	10. Water Vapor: 7 %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): <p>This emissions point represents the stack from the No. 7 Power Boiler ESP. The Coal Handling System and Ash Handling System are also included in this emission unit. Stack parameters updated from recent stack test data. Flow rate calculated based on ratio of maximum operating rate to actual operating rate during stack test.</p>			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External Combustion Boilers, Industrial, Bituminous Coal, Pulverized Coal: Dry Bottom (Tangential)		
2. Source Classification Code (SCC): 1-02-002-12		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: 40.84	5. Maximum Annual Rate: 357,758	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash: 7	9. Million Btu per SCC Unit: 25
10. Segment Comment (limit to 200 characters): Maximum % S limited to the formula: % S = (6.32 x 10⁻⁵) x (BTU/lb coal). Maximum rates based on 12,500 Btu/lb and 1,021 MMBtu/hr.		

Segment Description and Rate: Segment 2 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External Combustion Boilers, Industrial, Residual Oil: Grade 6 Oil		
2. Source Classification Code (SCC): 1-02-004-01		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 6.807	5. Maximum Annual Rate: 5,963	6. Estimated Annual Activity Factor:
13. Maximum % Sulfur: 2.5	8. Maximum % Ash:	9. Million Btu per SCC Unit: 150
10. Segment Comment (limit to 200 characters): No. 6 fuel oil may contain on-spec used oil and shall only be used as supplemental fuel, standby when coal is not available, startups, and shutdowns. Basis: 1,021 MMBtu/hr; limited to 10% annual capacity factor.		

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 3 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External Combustion Boilers, Industrial, Wood/Bark Waste		
2. Source Classification Code (SCC): 1-02-009-02		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: 10	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Segment represents input of carbonaceous fuel (sludge and bark ash). Based on Permit No. 0890003-001-AV.		

Segment Description and Rate: Segment 4 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Bulk Materials Storage Bins: Coal		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 400	5. Maximum Annual Rate: 357,758	6. Estimated Annual Activity Factor:
14. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum hourly rate represents system design unloading capacity. Annual rate represents throughput to No. 7 Power Boiler.		

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 5 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External Combustion Boilers, Industrial, Distillate Oil; Grades 1 and 2 Oil		
2. Source Classification Code (SCC): 1-02-005-01		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 7.293	5. Maximum Annual Rate: 6,389	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.5	8. Maximum % Ash:	9. Million Btu per SCC Unit: 140
10. Segment Comment (limit to 200 characters): Maximum hourly rate based on 1,021 MMBtu/hr. Maximum annual rate based on limit of 10-percent annual capacity factor. No. 2 fuel oil used only as supplemental fuel, standby when coal is not available or for startups and shutdowns.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
15. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	010		EL
PM ₁₀	010		NS
SO ₂			EL
NO _x			EL
CO			EL
VOC			NS
HAPS			NS
H106			NS
H107			NS

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 102.1 lb/hour 447.2 tons/year		4. Synthetically Limited? <input type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.1 lb/MMBtu Reference: 40 CFR 60.42(a)(1)		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): 0.1 lb/MMBtu x 1,021 MMBtu/hr = 102.1 lb/hr; 102.1 lb/hr x 8,760 hr/yr x 1 ton/2,000 lb = 447.2 ton/yr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.1 lb/MMBtu		4. Equivalent Allowable Emissions: 102.1 lb/hour 447.2 tons/year	
5. Method of Compliance (limit to 60 characters): Annual source testing using EPA Method 5.			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 40 CFR 60.42(a)(1)			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 1,225.2 lb/hour 5,366.38 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 1.2 lb/MMBtu Reference: 40 CFR 60.43(a)(2)		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): 1.2 lb/MMBtu x 1,021 MMBtu/hr = 1,225.2 lb/hr; 1,225.2 lb/hr x 8,760 hr/yr x 1 ton/2,000 lb = 5,366.38 ton/yr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 1.2 lb/MMBtu		4. Equivalent Allowable Emissions: 1,225.2 lb/hour 5,366.38 tons/year	
5. Method of Compliance (limit to 60 characters): Fuel sampling and analyses; source testing on request using EPA Method 6.			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 40 CFR 60.43(a)(2)			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: NO_x	2. Total Percent Efficiency of Control:
3. Potential Emissions: 714.7 lb/hour 3,130.4 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.7 lb/MMBtu Reference: See Comment	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): 0.7 lb/MMBtu x 1,021 MMBtu/hr = 714.7 lb/hr; 714.7 lb/hr x 8,760 hr/yr x 1 ton/2,000 lb = 3,130.4 ton/yr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emission Factor Reference: Amended BACT determination dated 10-22-84. Limit also based on 40 CFR 60.44(a)(3).	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.7 lb/MMBtu	4. Equivalent Allowable Emissions: 714.7 lb/hour 3,130.4 tons/year
5. Method of Compliance (limit to 60 characters): Source testing on request using EPA Method 7.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Allowable emissions based on amended BACT determination dated 10-22-84 and 40 CFR 60.44(a)(3).	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: CO	2. Total Percent Efficiency of Control:
3. Potential Emissions: 93.6 lb/hour 409.97 tons/year	4. Synthetically Limited? <input type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 93.6 lb/hr Reference: Permit Limit	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): 93.6 lb/hr x 8,760 hr/yr x ton/2,000 lb = 409.97 ton/yr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emission Factor Reference: Compliance Test and Permit No. 0890003-001-AV, EPA/DER agreement, and CFR 52.21(j).	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 93.6 lb/hr	4. Equivalent Allowable Emissions: 93.6 lb/hour 409.97 tons/year
5. Method of Compliance (limit to 60 characters): Source testing on request using EPA Method 10.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): See Emission Factor Reference above.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: 27 % Maximum Period of Excess Opacity Allowed: 6 min/hour	
4. Method of Compliance: Annual test using EPA Method 9.	
5. Visible Emissions Comment (limit to 200 characters): 40 CFR 60.42(a)(2)	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 2

1. Parameter Code: VE	2. Pollutant(s):
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Land Combustion Model Number: 4500 Serial Number: 94488070	
5. Installation Date: 01 Apr 1995	6. Performance Specification Test Date: 22 Mar 1995
7. Continuous Monitor Comment (limit to 200 characters): 40 CFR 60.45(a)	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 2 of 2

1. Parameter Code: O₂	2. Pollutant(s):
3. CMS Requirement:	[] Rule [<input checked="" type="checkbox"/>] Other
4. Monitor Information: Manufacturer: Yokogawa Model Number: Z021 Serial Number: 630509	
5. Installation Date: 1997	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Required per Permit No. 0890003-001-AV, EPA/DER agreement, and CFR 52.21(j).	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: <u>JSF-EU1-J1</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [X] Attached, Document ID: <u>JSF-EU6-J2</u> [] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: <u>JSF-EU6-J3</u> [] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [X] Attached, Document ID: <u>JSF-EU6-J4</u> [] Not Applicable [] Waiver Requested
5. Compliance Test Report [] Attached, Document ID: _____ [] Previously submitted, Date: _____ [X] Not Applicable
6. Procedures for Startup and Shutdown [X] Attached, Document ID: <u>JSF-EU6-J6</u> [] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [] Attached, Document ID: _____ [X] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation [X] Attached, Document ID: JSF-EU6-J11 [] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [X] Attached, Document ID: JSF-EU6-J13 [] Not Applicable
14. Compliance Assurance Monitoring Plan [X] Attached, Document ID: Attachment A [] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT JSF-EU6-J2

FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT JSF-EU6-J2**FUEL ANALYSIS
NO. 7 POWER BOILER**

Fuel	Density (lb/gal)	Moisture (%)	Weight % Sulfur	Weight % Nitrogen	Weight % Ash	Heat Capacity
Coal			0.7	1.5	7	12,500 Btu/lb
Bark Fly Ash		4	1	0.5	35	8,800 Btu/lb
No. 2 Fuel Oil ^a	6.83		0.5			136,000 Btu/gal
No. 6 Fuel Oil ^a	8.33	--	2.5		0.1	145,000 - 150,000 Btu/gal

^a Fuel oil may contain on-spec used oil.

ATTACHMENT JSF-EU6-J3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT JSF-EU6-J3

**CONTROL EQUIPMENT PARAMETERS
NO. 7 POWER BOILER ELECTROSTATIC PRECIPITATOR**

Manufacturer and Model No.	<u>Air Pollution, Inc.</u>		
Model No.	<u>IP 3356</u>		
Date of Installation	<u>November 1981</u>		
Inlet Gas Temperature	<u>373</u>	°F	
Inlet Gas Flow Rate	<u>460,000</u>	acfm	
Primary Voltage	<u>440</u>	kV	
Secondary Voltage	<u>55</u>	kV	
Primary Current	<u>250</u>	Amps	
Secondary Current	<u>500</u>	mAmps	
Spark Rate	<u>2</u>	Per minute	
Pressure Drop Across Device	<u>26.5</u>	inches of H ₂ O	
Maximum Permitted Particulate Matter Emissions*	<u>102.1</u>	lb/hr	
<u>Pollutants</u>	<u>Inlet Loading</u>	<u>Outlet Loading</u>	<u>Control Efficiency</u>
Particulate Matter **	6,435 lb/hr	102.1 lb/hr	99 %

*Values obtained from Permit No. 0890003-001-AV.

**Loading value from 1995 source test.

ATTACHMENT JSF-EU6-J4
DESCRIPTION OF STACK SAMPLING FACILITIES

ATTACHMENT JSF-EU6-J4**DESCRIPTION OF STACK SAMPLING FACILITY
NO. 7 POWER BOILER**

The following is a description of the No. 7 Power Boiler stack sampling facilities [as required per Rule 62-297.310(6)].

Sampling ports

1. All sampling ports have an inside diameter of approximately 5 inches.
2. The ports are capable of being sealed when not in use.
3. The sampling ports are located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. A complete application to construct was filed after December 1, 1980; therefore, four sampling ports, each 90 degrees apart, were installed since the stack has an outside diameter greater than 10 feet.

Work platforms

1. The working platform is approximately 80 square feet in area and approximately 4 feet wide.
2. This circular stack has more than two sampling ports; therefore, the work platform extends 360 degrees around the stack.
3. The platform is equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor opening cover if ladder access is used to reach the platform.

Means of access

1. Ladders to the work platform exceeding 15 feet in length have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.
2. Walkways over free fall areas are equipped with safety rails and toeboards.

Equipment support structures

1. A complete monorail or dualrail arrangement is substituted for the eyebolt and angle bracket.

ATTACHMENT JSF-EU6-J6
PROCEDURES FOR STARTUP AND SHUTDOWN

ATTACHMENT JSF-EU6-J6**STARTUP AND SHUTDOWN PROCEDURE****No. 7 Power Boiler with electrostatic precipitator.****Startup**

Startup requires approximately 4.5 to 6 hours to reach full boiler capacity. Excess emissions of particulate matter may occur during this time. To minimize the duration and magnitude of excess emissions during startup, the following procedure is undertaken:

- The electrostatic precipitator is turned on as soon as the coal pulverizer is placed in operation to reduce particulate matter emissions.

Shutdown

Shutdown requires approximately 4.5 to 6 hours. Excess emissions of particulate matter may occur during this time. To minimize the duration and magnitude of excess emissions during shutdown, the following procedures are undertaken:

- The electrostatic precipitator remains in service until after No. 6 fuel oil is fired for boiler cool down to reduce particulate matter emissions.
- The coal pulverizer is shut off after No. 6 fuel oil is fired.

ATTACHMENT JSF-EU6-J11

ALTERNATIVE METHODS OF OPERATION

ATTACHMENT JSF-EU6-J11

ALTERNATIVE METHODS OF OPERATION

No. 7 Power Boiler

The No. 7 Power Boiler (No. 7 PB) may be operated under the Alternative Methods of Operation described below:

Alternative Method	Fuel Options ^a	Maximum Heat Input Rate (MMBtu/hr)	Maximum Operating Rate
1	Coal only (24-hr average).	1,021	81,680 lb/hr ^b
2	No. 6 fuel oil only (24-hr average).	1,021	6,800 gal/hr
3	No. 2 fuel oil only (24-hr average).	1,021	7,300 gal/hr
4	Any combination of the alternative methods listed above.	1,021	Individual rates listed above.
5	Any combination of the alternative methods listed above with No. 5 Power Boiler ash.	1,021	Individual rates listed above, 10 tons (bark ash)/hr ^c .

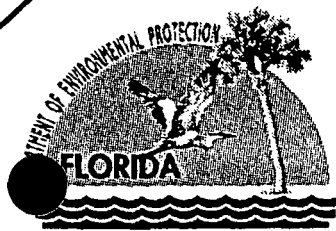
^a Fly ash from the No. 5 Power Boiler may be injected with any alternate method of operation.

^b Based on coal heating value of 12,500 Btu/lb. Operating rate is not measured; instead, this value is calculated.

^c Heating value associated with bark ash is included in 1,021 MMBtu/hr.

ATTACHMENT JSF-EU6-J13

IDENTIFICATION OF ADDITIONAL APPLICABLE REQUIREMENTS



Jeb Bush
Governor

Department of Environmental Protection

GOLDER ASSOCIATES INC.

NOV - 1 2002

GAINESVILLE

David B. Struhs
Secretary

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

October 30, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Warren S. Flenniken
Vice President & General Manager
Jefferson Smurfit Corporation (U.S.), Mill Div.
North 8th Street
Fernandina Beach, Florida 32034

Re: DEP File No. 0890003-007-AC, PSD-FL-062A
No. 7 Power Boiler Oxygen Set Point

Dear Mr. Flenniken:

The Department has reviewed your request of June 4, 2002, to request a clarification to the requirement for the No. 7 Power Boiler to continuously monitor oxygen set points. The request to reflect a 3-hour averaging time for the oxygen set points is acceptable to the Department. The Environmental Protection Agency (EPA) was included in this determination and their letter to the Department is included with this modification. EPA Region IV issued a federal PSD permit on April 13, 1981 as PSD-FL-062. Specific Condition No. 6 of the permit is hereby modified as follows:

SPECIFIC CONDITION NO. 6

The applicant shall optimize combustion conditions to minimize NO_x formation in accordance with the attached provisions, "Use of Flue Gas Oxygen Meter as BACT for Combustion Controls." A 3-hour averaging time shall be used for the Oxygen set points.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

"More Protection, Less Process"

Printed on recycled paper.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

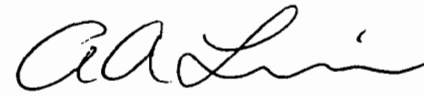
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.


for Howard L. Rhodes, Director
Division of Air Resources
Management

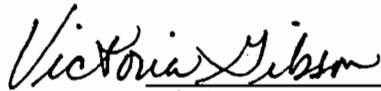
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 10/30/02 to the person(s) listed:

Mr. Warren S. Flenniken, Jefferson Smurfit Corp.*
Ms. Jeaneanne M. Gettle, EPA Region IV
Mr. Chris Kirts, DEP-NED
Mr. David Buff, P.E., Golder Associates, Inc.

Clerk Stamp

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

 October 30, 2002
(Clerk) (Date)

GOLDER ASSOCIATES INC.

NOV - 1 2002

GAINESVILLE

Best Available Copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 09 2002

4APT-APB

Mr. A. A. Linero, P.E.
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

OCT 15 2002

BUREAU OF AIR REGULATION

Dear Mr. Linero:

Thank you for your letter dated July 10, 2002, regarding averaging periods for the measurements made by the continuous oxygen monitor on the No. 7 Power Boiler at the Jefferson Smurfit kraft pulp mill in Fernandina Beach, Florida. Oxygen measurements are needed in part to assess compliance with the nitrogen oxides (NO_x) emissions limit. Jefferson Smurfit has proposed a 3-hour averaging period. Since the compliance test method specified in the permit for NO_x emissions is Method 7, a 3-hour averaging period for oxygen measurements seems reasonable to us because it is consistent with the averaging period resulting from use of Method 7. However, the Florida Department of Environmental Protection is certainly at liberty to choose a shorter averaging period if you prefer.

If you have any questions regarding this letter, please call Jim Little at (404) 562-9118.

Sincerely,

A handwritten signature in cursive script that reads "James W. Little, for".

Jeaneanne M. Gettle
Acting Chief
Air Permits Section



Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

PERMITTEE:

Container Corporation of America
North Eighth Street
Fernandina Beach, FL 32034

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

County:

Latitude/Longitude:

Project:

UTM:

31JAX45000315

~~A045-169854~~

December 08, 1989

December 11, 1994

Nassau

30°40'53"N; 81°27'26"W

No. 7 Power Boiler

E-456.2; N-3394.2

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 perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of No. 7 Power Boiler, fired with coal and particulate matter emissions are controlled by an electrostatic precipitator.

Located at N. 8th St., Fernandina Beach, Nassau County, FL

In accordance with:

1. Application for a Construction Permit dated 10-1-80 and attachments
2. Certificate of Completion of Construction form dated 6-16-83
3. New Sources Performance Standards Retest Report dated 6-27-84
4. Additional information received 9-26-83, 7-2-84 and 10-8-84
5. Renewal application dated 9-6-89

PERMITTEE:

Container Corporation of America
North Eighth Street
Fernandina Beach, FL 32034

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

County:

31JAX45000315

A045-169854

December 07, 1989

December 11, 1994

Nassau

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 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, 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:

PERMITTEE:

Container Corporation of America
North Eighth Street
Fernandina Beach, FL 32034

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

County:

31JAX45000315

A045-169854

December 08, 1989

December 11, 1994

Nassau

GENERAL CONDITIONS (CONT'D):

- 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 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.

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 noncompliance 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.

PERMITTEE:

Container Corporation of America
North Eighth Street
Fernandina Beach, FL 32034

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

County:

31JAX45000315

A045-169854

December 07, 1989

December 11, 1994

Nassau

GENERAL CONDITIONS (CONT'D):

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)
- 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 period of 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, FL 32034

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

County:

31JAX45000315

A045-169854

December 08, 1989

December 11, 1994

Nassau

SPECIFIC CONDITIONS:

- The maximum input rate (operating rate) is shown below and shall not be exceeded without prior approval.

<u>Rate</u>	<u>Material</u>
1021 MMBTU/hr	Coal ¹
---	No. 6 fuel oil ²

¹ To produce 825,000 lbs steam/hr at 825°F & 850 psig

² Used as supplement fuel, standby when coal is not available, startups, and shutdowns. The fuel oil sulfur content shall not exceed 2.5% by wt.

- Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition (SC) No. 1, or SC No. 3 will become effective.
- The operating rate shall not exceed 110% of the operating rate during the most recent test except for testing purposes, but shall not exceed that rate in SC No. 1. After testing at an operating rate greater than 110% of the last test operating rate, the operating rate shall not exceed 110% of the last (submitted) test operating rate until the test report at the higher rate has been reviewed and accepted by the Department.
- The permitted maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>Rule</u>	<u>Emissions Rate</u>		<i>Revised A045-35 10-22-84/cfr</i>
		<u>lbs/hr</u>	<u>TPY</u>	
From power boiler stack:				
PM ¹	17-2.660, FAC; CFR 60.42	102.10 ²	447.20 ³	=
SO ₂ ⁴	17-2.660, FAC; CFR 60.43	1225.20 ⁵	5366.38 ³	
NO _x ⁶	EPA/DER Agreement; CFR 52.21(j)	612.60 ⁷	2683.19 ³	
CO ⁸	EPA/DER Agreement; CFR 52.21(j)	93.60 ⁹	409.97 ³	
VE ¹⁰	17-2.660, FAC; CFR 60.42	20% Opacity ¹¹		

- PM - Particulate matter
- Basis: 1021 MMBTU/hr; 0.10 lb/MMBTU
- Hours of operation shall be limited to 8760 H/Y and shall be recorded.
- SO₂ - sulfur dioxide
- Basis: 1021 MMBTU/hr; 1.2 lb/MMBTU
- NO_x - Nitrogen oxides
- Basis: 1021 MMBTU/hr; 0.60 lb/MMBTU → 0.7 lb/MMBTU
- CO - Carbon monoxide
- Basis: Compliance test & A045 - 71885
- VE - Visible emissions
- Except for one six-minute period per hr of not more than 27% Opacity.

PERMITTEE:

Container Corporation of America
 North Eighth Street
 Fernandina Beach, FL 32034

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

County:

31JAX45000315

A045-169854

December 07, 1989

December 11, 1994

Nassau

SPECIFIC CONDITIONS:

<u>Pollutant</u>	<u>Rule</u>	<u>Emissions Rate</u>	
		<u>lbs/hr</u>	<u>TPY</u>
From ash handling facility:			
PM	EPA/DER Agreement; CFR 52.21(j)	0.5 ¹²	---
VE	EPA/DER Agreement; CFR 52.21(j)	5% Opacity	

12 Basis: EPA document PSD-FL-062

From all fugitive¹³ or point sources within coal preparation and handling systems which includes any storage pile(s):

VE	17-2.610(2), FAC; CFR 60.252	20% Opacity
----	------------------------------	-------------

13 Also, see SPECIFIC CONDITION #5

- Unconfined particulate matter emissions shall be controlled by application of dust suppressants, unless an alternative method is requested and approved, to all areas necessary to reasonably control such emissions per Florida Administrative Code Rule 17-2.610(3).
- Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 14 days prior to testing, and submit the test report documentation to the Department within 45 days after completion of the testing:

<u>Pollutant</u>	<u>Interval from</u>	<u>Test Method(s)¹</u>
------------------	----------------------	-----------------------------------

From power boiler stack:

PM	12 Months from 05-01-89	EPA 5
SO ₂	On request	EPA 6
NO _x	On request	EPA 7
CO	On request	---
VE	12 Months from 05-01-89 ²	EPA 9

From ash handling facility:

VE	12 Months from 05-01-89	EPA 9
----	-------------------------	-------

From ash fugitive or point sources within coal preparation and handling system which includes any storage pile(s):

VE	12 Months from 05-01-89	EPA 9
----	-------------------------	-------

PERMITTEE:

Container Corporation of America
North Eighth Street
Fernandina Beach, FL 32034

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

County:

31JAX45000315

A045-169854

December 08, 1989

December 11, 1994

Nassau

SPECIFIC CONDITIONS:

¹From 17-2.700(1), FAC in Table 700-1

Tests and test reports shall comply with the requirements of Florida Administrative Code Rule 17-2.700(6) and (7), respectively.

² Test for 1 hr. during each PM test run.

7. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.

8. Operation and emission monitoring requirements are:

VE CEMS; report per CFR 60.7(c)

SO₂^{1,2} Report per CFR 60.7(c)

NO_x³ BACT set pt.; CEMS not required per CFR 60.45(b)(3)

CO⁴ BACT set pt; continuous; report per CFR 60.7(c)

1 - SO₂: The CCA procedure for compliance monitoring of SO₂ in lieu of a CEMS has been approved by EPA (11-21-89) and DER (12-06-89). This procedure should prevent the firing of non-complying sulfur coal.

2.- Coal fuel is limited to a maximum sulfur content determined by the following formula:

$$\%S \text{ (max allowed)} = (6.32 \times 10^{-5}) \times (\text{BTU per lb coal}).$$

3.- NO_x: BACT set pt. for continuous O₂ monitor at boiler exit to flue shall not be greater than 7.7% as the high limit point at which the allowable NO_x emissions rate shall not be exceeded.

4.- CO: BACT set pt. for continuous O₂ monitor at boiler exit to flue shall not be less than 2.7% as the low limit point at which the allowable CO emission rate shall not be exceeded.

9. Fuel input shall be monitored and a daily record maintained for a minimum of 2 years.

10. Dust suppression systems shall be used in the coal preparation and handling facilities which includes (a) coal unloading; (b) coal crusher in the power building; (c) coal pile(s), if any; and (d) coal transport conveyors.

11. Permittee shall provide/maintain (1) adequate sampling ports, (2) safe sampling platforms and safe access, and (3) safe utilities for testing equipment.

PERMITTEE:

Container Corporation of America
North Eighth Street
Fernandina Beach, FL 32034

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

County:

31JAX45000315

A045-169854

December 08, 1989

December 11, 1994

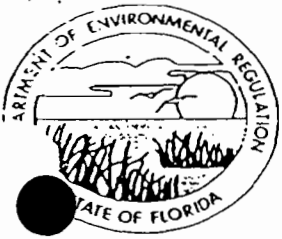
Nassau

SPECIFIC CONDITIONS:

12. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of two(2) years from the date of recording.
13. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, modifications to the permit may then be made by the permitting authority to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein.
14. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide the permitting authority with the following information in writing within five (5) days of such conditions.
 - (a) description of noncomplying emissions(s),
 - (b) cause of noncompliance,
 - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance
 - (d) steps taken by the permittee to reduce and eliminate the noncomplying emission, and
 - (e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of this report does not constitute a waiver of the emission limitations contained within this permit.

15. The permittee shall allow representatives of the Department and/or representatives of the Environmental Protection Agency, upon the presentation of credentials:
 - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Act;



Best Available Copy

1/23 cc: C. Gay

Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 21, 1992

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

Dear Mr. Barlow:

Nassau County - AP
Container Corporation of America
No. 7 Power Boiler
Addendum to Permit No. A045-169854
for Bark Ash Injection

The subject request (received 01-10-92) for an addendum to permit A045-169854 and previously submitted test reports are acceptable, and the addendum is issued as follows:

Specific Condition Addendum:

- i. Rate: 3.33 TPH; Material: Bark ash from #5 PB

A copy of this letter must be filed with the referenced permit and shall become a part of that permit.

Sincerely,

Handwritten signature of Ernest E. Frey

Ernest E. Frey, P.E.
Director of District Management

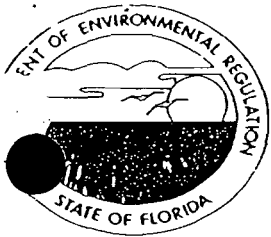
EEF:JC:bt with handwritten initials

15020VE
JAN 23 1992

Administration 448-4300
Air 448-4310
Waste Management 448-4320



IRNWONA
Water Facilities 448-4330
Water Management 448-4340
FAX 448-4366



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

December 11, 1989

Mr. Roger Hagan
Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

cc: R. Hagan
D. Little
R. Cobb - Clayton legal
R. Williams - Jax CMD

(original to S. Luedtke)

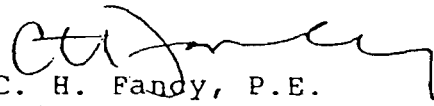
Dear Mr. Hagan:

Enclosed is the Environmental Protection Agency's recommended approval of your power boiler #7 fuel sampling and analysis procedures in lieu of continuous emissions monitoring for SO₂. The EPA's response is in reply to an inquiry by the Department's Air Compliance Section.

The Department hereby approves your requested sampling and analysis procedures that have been in effect since #7 power boiler became operational. We do not plan to take any further action, however, you should not in the future, assume that you have a waiver from rule requirements until final approval is granted. The submittal of a request does not constitute approval.

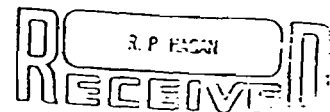
Please contact John Brown at (904) 488-1344 or me if you have any questions.

Sincerely,


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

CHF/ht

cc: Andy Kutyna, NE District
Terry Cole



DEC 14 1989

u m



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET NE
ATLANTA, GEORGIA 30365

NOV 21 1989

4APT-AC

Mr. Steve Smallwood, P.E., Director
Division of Air Resources Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED
NOV 27 1989
NORTHEAST
DER-BACKLICK
DER-JACKSONVILLE

Dear Mr. Smallwood:

As requested in your letter of September 18, 1989, we have reviewed the fuel sampling and analysis plan to determine SO₂ emissions from boiler No. 7 operated by Container Corporation of America in Nassau County, Florida. Boiler No. 7 is subject to 40 CFR Part 60, Subpart D and is required to monitor SO₂ emissions as specified by §60.45(a). Since boiler No. 7 does not have an SO₂ control device, Container Corporation can monitor SO₂ by fuel sampling and analysis as allowed by §60.45(b). However, since the fuel sampling and analysis procedures are reserved, then source owners must propose their own.

We recommend that Container Corporation's proposed fuel sampling and analysis procedures be approved. Their proposed procedures should provide representative SO₂ emissions from boiler No.7 and should prevent the firing of non-complying sulfur coal.

If you have any questions regarding this letter, please contact Mr. Paul Reinermann at 404/347-2904.

Sincerely yours,

Roger O. Pfaff, Chief
Air Compliance Branch
Air, Pesticides and Toxics
Management Division

*cc: Kutyra, NE Dist.
M. Reinermann NE Dist.*

cc: R. HAGAN
D. LITTLE
R. Lobb - Clayton Legal
ENV FILE
R. CAFFO

RECEIVED
DEC 11 1989
Ans'd.....

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT
3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
904/798-4200



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER

August 25, 1988

Mr. Paul J. Magnell
Vice President and Resident Manager
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

Dear Mr. Magnell:

Nassau County - AP
Container Corporation of America
No. 7 Power Boiler
ID No. 31JAX45000315
Permit No. AO45-71885

This is in response to the May 6 request from Chris Hardy that the ash handling facility visible emissions (VE) testing be revised.

The test Specific Condition No. 3 is changed in part to read:

From ash handling facility:
VE 12 months

A copy of this letter must be attached to the referenced permit and shall become a part of that permit.

Sincerely,

Ernest E. Frey
Deputy Assistant Secretary

EEF:jck

RECEIVED

AUG 29 1988

FERNANDINA MILL



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

APR 13 1981

REF: 4AH-AF

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Proposed Modification to Kraft
Paper Mill, PSD-FL-062

Dear Mr. Galphin:

Review of your April 25, 1980 application to modify your existing kraft paper mill located in the northwest sector of Fernandina Beach, Nassau County, Florida, has been completed. The modification is subject to rules for the Prevention of Significant Air Quality Deterioration (PSD) contained in 40 CFR §52.21.

We have determined that the modification, as described in the application, meets all applicable requirements of the PSD regulations, subject to the conditions in the Conclusions section to the Final Determination (enclosed). EPA performed the preliminary determination concerning the proposed modification, and published a request for public comment on March 6, 1981. One comment was received. Our response to the comment has been attached to the Final Determination. Authority to Construct a Stationary Source is hereby issued for the facility described above, subject to the conditions in the Conclusions section to the Final Determination. This Authority to Construct is based solely on the requirements of 40 CFR §52.21, the Federal regulations governing significant deterioration of air quality. It does not apply to NPDES or other permits issued by this agency or permits issued by other agencies. Information regarding EPA permitting requirements can be provided if you contact Mr. Joe Franzmathes, Director, Office of Program Integration and Operations, at 404/881-3476. Additionally, construction covered by this Authority to Construct must be initiated within 18 months from the date of this letter.

Please be advised that a violation of any condition issued as part of this approval, as well as any construction which proceeds in material variance with information submitted in your application, will be subject to enforcement action.

APR 25 1981

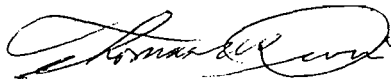
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FERNANDINA MILL

Authority to Construct will take effect on the date of this letter. The complete analysis which justifies this approval has been fully documented for future reference, if necessary. Any questions concerning this approval may be directed to Dr. Kent Williams, Chief, New Source Review Section, 404/881-4552.

Sincerely yours,



Thomas W. Devine
Director
Air and Hazardous Materials Division

Enclosure

cc: FL DER

I. Applicant

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

II. Location

The proposed modification is located in the northwest sector of Fernandina Beach, Nassau County, Florida. This is on Amelia Island, approximately 40 kilometers northeast of Jacksonville, Florida. The UTM coordinators are: Zone 17, 456.2 km east and 3394.2 km north.

III. Project Description

The applicant proposes to modify its existing kraft paper mill by increasing steam generation capacity and changing fuel usage. Dependence on fuel oil is to be reduced by adding the capability to burn off coal and by the increased use of wood waste. The applicant proposes to construct the following new units:

- A coal/wood waste boiler (#7);
- Coal preparation and materials handling facilities to supply fuel to the new boiler; and
- Ash handling disposal facilities for the new boiler.

The modification will also include complete shutdown of the following facilities:

- No. 6 power boiler; and
- No. 3 recovery boiler and its associated smelt tank.

Power boiler No. 3 will be placed on "cold" standby. It will not be used except where one or more of the larger boilers is out of service.

Equipment capacity data for affected emissions units are summarized in Table 1.

IV. Source Impact Analysis

The existing kraft pulp and paper mill has the potential to emit greater than 100 tons per year of particulate matter (PM), sulfur dioxide (SO₂), nitrogen oxides (NO_x), volatile organic compounds (VOC) and carbon monoxide (CO). The existing source, therefore, is a major stationary source. The proposed modification significantly increases emissions of pollutants regulated under the Clean Air Act (Act) as amended August 7, 1977 (see Table 2). Thus, in accordance with Title 40, Code of Federal Regulations, Part 52.21 (40 CFR 52.21) as promulgated August 7, 1980 (45FR52676), the proposed project is a major modification and is subject to PSD review.

PSD review applies to each pollutant for which the modification would result in a significant net emissions increase. Table 2 summarizes emission changes of all pollutants regulated under the Act affected by the proposed modification. The table shows the proposed net emissions increases of PM, SO₂, NO_x, VOC, and CO are significant as defined in the PSD regulations 40 CFR 52.21(b)(23), and therefore are subject to PSD review.

The PSD review analyzes the following:

- A. Best Available Control Technology (BACT);
- B. PSD Increment Impacts;
- C. Class I Area Impacts;
- D. National Ambient Air Quality Standards (NAAQS) Impacts;
- E. Growth Impacts; and
- F. Soils, Vegetation, and Visibility Impacts.

A. Best Available Control Technology

The applicant has submitted an application which has been determined to be complete before August 7, 1980. This application showed the modification was subject to 40 CFR 52.21 as in effect on June 19, 1978. Therefore, in accordance with 40 CFR 52.21(i)(9), the requirements for BACT specified in the 1980 PSD regulations, 40 CFR 52.21(j), shall not apply. Instead the requirements in accordance with 40 CFR 52.21(j) as in effect on June 19, 1978 shall be applied. The latter does not require a BACT review for facilities emitting VOC, because the increase of uncontrolled VOC emissions is less than 100 tons per year.

Any new or modified facility which increases emissions of SO₂, PM, NO_x, or CO must apply BACT. BACT is defined as the maximum degree of reduction achievable determined by a case-by-case review, taking into account energy, environmental, and economic impacts. The applicant has proposed BACT for each applicable case and has presented justification for the choice proposed. The justification is based upon the criteria listed above. BACT determinations are required to be at least as stringent as applicable NSPS limitations or requirements of the State Implementation Plan (SIP). Table 3 shows a summary of emissions limits and basis of requirements.

The applicant submitted a BACT analysis for the control of PM from the proposed No. 7 power boiler. The preferred candidate technology is:

- Multiclone dust collectors with reinjection of large wood char particles into the furnace, followed by
- an electrostatic precipitator.

The three alternative particulate control technologies also analyzed were:

- Wet scrubbers;
- Dry scrubbers; and
- Fabric filters.

The applicant's analysis was based upon many economic, energy, and environmental considerations. Pertinent to the EPA review of this analysis was that only the fabric filter alternative offered a potential environmental advantage over the ESP. The selection of the ESP over the fabric filters was based upon the potential fire hazard using wood fuel and the maintenance of filter bags considering the abrasive nature of wood ash. The applicant's analysis predicts the ESP emissions will be less than 50 percent of the NSPS standard of 0.1 pounds of PM per million Btu heat input. This is based upon the vendor's guarantee assuming a worst case ash content of 11 percent in coal and 3.75 percent in wood. Although actual PM emissions are expected to remain below the worst case calculated value of 0.049 pound per million BTU heat input (1b/MMBtu) the applicant proposes the NSPS limit of 0.1 lb/MMBtu

be established as BACT, because ESP performance is known to be reduced somewhat over the lifetime of equipment, and further, a design allowance must be made for continued temporary operation with a fraction of the 10 fields out of service.

EPA concurs that the proposed ESP equipment does constitute BACT for this case and that the NSPS standard of 0.1 lb/MMBtu will be achieved with this proposed technology.

The applicant has proposed that BACT for SO₂ emissions be represented by the NSPS standard of 1.2 pounds SO₂ per million Btu heat input. The applicant proposes to achieve this by burning low sulfur content (less than .75% S) Eastern or Mid Western bituminous coal.

The applicant has submitted alternate BACT candidates for SO₂ control; these are:

- Compliance (low sulfur) coal from other coal ranks;
- Coal cleaning prior to combustion; and
- Flue gas desulfurization (FGD).

The applicant's BACT review concluded that low sulfur bituminous coal would achieve the NSPS standard with the lowest economic impact and least technological uncertainty. EPA reviewed this analysis and questioned the availability of low sulfur coal over the lifetime of the proposed project. The applicant proposed to include in the equipment design necessary allowances to enable addition of FGD at any future date if and when a poor availability of low sulfur coal interfered with meeting the allowable emission standard of 1.2 lbs SO₂/MMBtu. With this condition, EPA concurs that the proposed use of less than .75 percent sulfur Eastern or Mid Western bituminous coal to achieve the NSPS emission limit does constitute BACT.

The applicant submitted a BACT analysis of PM control from fugitive and point sources associated with the coal preparation and handling. It is proposed to use surfactant sprays to minimize dust generation and enclosures for

critical operations. The applicant has considered some alternative additional controls, but rejected these because of economic impacts without material improvement of environmental impacts. EPA has reviewed the applicants proposal and concurs that it constitutes BACT for this case with the one additional requirement that the opacity limitation (less than 20%) required by NSPS 40 CFR 60 Subpart Y is applicable and shall be met.

The applicant proposed to control PM emissions from the ash handling system with a ventilation system controlled by fabric bag filters. It is proposed that PM emissions will be no greater than 0.5 pounds per hour from this system. EPA concurs that this technology and emission limit does constitute BACT for this case; however, it further determines that the opacity shall be no greater than 5 percent.

The applicant has submitted a BACT analysis for control of NO_x , VOC, and CO. He proposes to balance these emissions by controlling excess air and the ratio of overfire to underfire air rates. At the worst case conditions for NO_x control (100 percent coal fuel) the applicant proposes a limit of 0.6 lbs NO_x /MMBtu heat input. This corresponds to the NO_x limit established under the Florida State Implementation Plan BACT determination and is less than the NSPS requirements under 40 CFR 60 Subpart D. EPA has reviewed this proposed BACT and concurs it constitutes BACT for this case with the additional requirement that performance tests shall be run in accordance with the attached provisions "Use of Flue Gas Oxygen Meter as BACT for Combustion Controls." Thus, the BACT limit of 0.6 lb NO_x /MMBtu heat input from coal shall be an upper boundary with optimization of combustion conditions (i.e. excess air, and ratio of primary combustion air/overfire air) to minimize NO_x emissions with due consideration given to combustion efficiency and CO emissions.

Table 3 summarizes the allowable emission limits of all applicable pollutants and source facilities.

B. PSD Increment Impacts

Paragraph (k)(2) of the PSD regulations requires an analysis to ensure that no PSD increment will be violated. The applicable Class II area PSD increments are shown in Table 4. Class I area PSD increments are discussed in Section IV C below.

The applicant submitted an analysis to show the maximum impacts the proposed modification will have upon these increments. The analysis utilized the EPA approved Industrial Source Complex Model (ISC) to determine the maximum change in ambient air concentration projected for PM and SO₂. The data input to these model runs consisted of:

- Five years of surface meteorological data (1970-1974) collected at the Jacksonville Airport, and upper air data for the same time period measured over Waycross, Georgia;
- Maximum allowable emissions for the proposed new facilities;
- Creditable emissions increases from other Container Corporation increment consuming facilities; these are:
 - No. 5 recovery boiler and smelt tank (for construction under PSD-FL-002 issued 12/10/76); and
 - an increase in fuel oil sulfur content allowed under the Florida SIP on two existing power boilers (No. 4 and No. 5).
- Creditable emissions decreases which are part of this proposed project; these are:
 - Shut down of No. 6 power boiler;
 - Shut down of No. 3 recovery boiler and its associated smelt tank; and
 - Placing No. 3 power boiler on cold stand-by.

Other facility changes within 50 kilometers were reviewed to determine if interactions would occur in PSD increment impacts. Jacksonville Electric Authority (PSD-FL-010) was not included in this analysis because the Container Corporation application was determined to be complete one month prior to that of the Jacksonville Electric Authority. The area of impact does not extend to the site of a new boiler constructed by the Anheuser-Busch Company. No other increment consuming facilities were in the vicinity. Consistent with EPA policy for applications received prior to August 7, 1980 the impact of fugitive emissions associated with this project were not analyzed for increment impact. The modeled net changes to the ambient air concentrations due to the proposed project and all other emission changes are also shown in Table 4 and compared with the allowable PSD Class II area increments. EPA has reviewed the applicant's analysis and concurs that no PSD Class II area increments are threatened.

C. Class I Area Impacts

Two Class I areas are near the proposed modification. The Okefenokee Wildlife Wilderness Sanctuary and the Wolf Island National Wildlife Refuge and Wilderness Area are located approximately 64 kilometers west and 74 kilometers north of the mill, respectively.

The applicant analyzed the impact of the proposed modification upon these two Class I areas by including receptors on the Class I area boundaries in the increment analysis modeling runs. The maximum impact due to the net emission change for each Class I area and each averaging time is shown in Table 5. Also shown in Table 5 are the allowable Class I area increments. EPA concurs with the applicant's conclusion that no Class I area increment shall be threatened by the proposed modification, and further has determined that the air quality changes modeled for these two areas are so small as to constitute no affect.

D. NAAQS Impacts

Paragraph (k)(1) of the PSD regulations requires an analysis to ensure that no NAAQS will be violated. The applicable ambient standards are shown in Table 6.

The applicant submitted an analysis to show the maximum impacts the proposed modification will have upon these standards. This analysis considered:

- Monitored ambient air data measured by the Florida Department of Environmental Regulation at four monitoring sites within 3 kilometers of the Container Corporation (CAA) plant during 1977-1979;
- emissions of existing facilities at CCA, and of two nearby paper mills (ITT Rayonier and Gilman Paper Company) at allowable rates prior to 1979;
- emissions increases of existing facilities at CCA allowed since 1979; and
- emission increases and decreases associated with the proposed project.

The results of the applicant's analysis for PM, SO₂, and NO_x projected ambient maximum concentrations for the various averaging times. These maximum ambient concentrations calculated by the applicant's analysis are also shown in Table 6. By comparing these with the applicable NAAQS the applicant has concluded no threat to the standards will occur.

EPA has further noted that:

- Since the PM concentration changes of the net emissions change from the modification (see PSD Increment Analysis, Section IV B above) are not significant, no refined analysis of PM impact upon the PM standards is required; and
- The summation of the maximum monitored SO₂ concentrations (not corrected for existing facility impacts) and the maximum modeled SO₂ concentrations from all existing and new proposed facilities are less than the applicable NAAQS. These are also shown in Table 6.

On the basis of a review of the applicant's analysis of NAAQS impacts and the further worst case evidence EPA concurs with the applicant's conclusion that no NAAQS will be threatened by the proposed project.

E. Growth Impacts

The proposed project will not require additional employment nor will product production be increased; therefore, no local commercial or industrial growth will occur. The changes in incoming fuel transportation will be minimal and handled with existing facilities with a negligible change in secondary emissions.

F. Soils, Vegetation, and Visibility Impacts

The applicant analyzed impacts upon soils, vegetation and visibility due to the proposed project. The analysis includes a discussion of the susceptibility of the commercial crops (tobacco and corn) and the trees typical of the area (oaks and red maple) and concludes these range from intermediate sensitivity downward to resistant to SO₂. No vegetation showing extreme sensitivity is known in this area. The applicant concluded the impacts would be negligible. EPA has reviewed this analysis and concurs with the applicant's conclusion on the basis of the applicant's analysis and also because the impacts do not threaten secondary NAAQS standards which have been established considering these welfare related criteria.

V. Conclusions

EPA Region IV proposes a preliminary determination of approval with conditions for the construction of the modification to the Container Corporation of America's Fernandina Beach Paper Mill proposed in its application submitted April 25, 1980. The determination is made on the basis of information contained in the application and in additional information dated May 28, June 4, and November 12, 1980 received from the applicant. The specific conditions set forth in the permit are as follows:

1. The new facilities shall be constructed in accordance with the capacities and specifications stated in the application and summarized in Table 1. Specifically, at least 30 days prior to the beginning of construction, the permittee shall submit plans with sufficient details to adequately ensure available plant space for subsequent installation of a flue gas desulfurization unit if the availability of low sulfur coal threatens continued compliance with Condition 4 (below).

2. Visible emissions from all fugitive or point sources within the coal preparation and handling system shall not exhibit 20 percent opacity or greater in accordance with the NSPS for coal preparation plants (40 CFR 60 Subpart Y).
3. Particulate matter emissions from the ash handling facility shall not exceed 0.5 pounds per hour and opacity shall not exceed 5 percent while operating at maximum operating rate.
4. Emissions of PM, SO₂, and NO_x from the new No. 7 power boiler shall not exceed the mass rate shown in Table 7 while operating at the maximum operating rates shown for each fuel type. At lesser operating rates the emissions shall not exceed the specified emissions limits per unit heat input.
5. Visible emissions from the No. 7 power boiler shall not exhibit greater than 20 percent opacity except for one 6-minute period per hour of not more than 27 percent opacity (NSPS 40 CFR 60 Subpart D).
6. The applicant shall optimize combustion conditions to minimize NO_x formation in accordance with the attached provisions, "Use of Flue Gas Oxygen Meter as BACT for Combustion Controls."
7. The applicant shall install, calibrate, maintain, and operate continuous monitoring systems for measuring opacity, SO₂ emissions, NO_x emissions, either oxygen or carbon dioxide (CO₂), and fuel input rates of coal and wood waste on No. 7 power boiler in accordance with the provisions of 40 CFR 60 Subpart D paragraph 60.45. The applicant shall also comply with all other applicable requirements of 40 CFR 60 Subpart D (NSPS).
8. Compliance with the emission limits (Conditions 2-6) shall be determined by performance tests scheduled in accordance with the attached General Conditions. Performance testing for the mass emissions rate from the fly ash handling system is not required providing compliance with the opacity standard is demonstrated and maintained. The performance tests

shall be conducted in accordance with the provisions of reference methods in Appendix A of 40 CFR 60, except as provided under 40 CFR 60.8(b), as follows:

- a. Method 1 for sample and velocity traverses;
- b. Method 3 for gas analysis;
- c. Method 5 for concentration of PM and associated moisture content;
- d. Method 6 for SO₂ concentrations;
- e. Method 7 for NO_x concentrations;
- f. Method 9 for visible emissions.

All other procedures for these compliance tests shall be in accordance with 40 CFR 60 Subpart D paragraph 60.46.

Each facility shall operate within 10 percent of maximum operating rate during sampling. The parameters of operating rate, control equipment variables and all continuous monitoring results shall be recorded during compliance testing and made a part of the reported results.

The performance test for visible emissions from No. 7 power boiler shall be observed during the compliance tests for the PM mass emissions rate.

9. The permittee shall apply a chemical stabilizer to the active and inactive storage piles as needed to maintain an opacity of equal to or below 20 percent. Chemicals will be added in accordance with the manufacturer's recommendations.
10. The permittee shall operate a wet suppression spray system at all car dumps and shall enclose conveyors and transfer points to maintain an opacity of equal to or below 20 percent.
11. The applicant shall monitor fuel input to the No. 7 boiler and maintain a daily record of fuels fired consistent with the provisions of attached General Condition 4.
12. The source shall comply with the requirements of the attached General Conditions.

Table 1
Project Description Summary

<u>Facility</u>	<u>Operating Capacity</u>
A. New or Reconstructed	
1. No. 7 Power Boiler	1021/1084 ^{a,b}
2. Coal Handling	41 ^c
3. Ash Handling	4 ^c
B. Existing (To be shutdown or placed on "cold" standby)	
1. No. 6 Power Boiler	180 ^a
2. No. 3 Power Boiler ^d	227 ^a
3. No. 3 Recovery Boiler	248 ^a
4. No. 3 Smelt Tank	8.42 ^e

^aMillions Btu/hour (heat input).

^b100% coal/28.7% heat input from wood and 71.3% from coal.

^cTons/hour.

^dNo. 3 boiler on "cold" standby; not to be used except when a larger unit is temporarily and completely out of service.

^eTons/hour of smelt.

Table 2
Summary of Emissions
(tons per year)

<u>Facility</u>	<u>PM</u>	<u>SO₂</u>	<u>NO_x</u>	<u>VOC</u>	<u>CO</u>
New Construction					
Coal Storage and Coal Handling System	75 ^a	0	0	0	0
Ash Handling System	2	0	0	0	0
No. 7 Power Boiler	472	5363	2681	56	410
Total Allowed Increase ^b	549	5363	2681	56	410
To be Shut Down					
No. 6 Power Boiler	62	1737	260	3	21
No. 3 Power Boiler	80	2185	330	3	28
No. 3 Recovery Boiler	163	333	-	-	136
No. 3 Smelt Tank	<u>56</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total Actual Decrease ^c	361	4255	590	6	185
Net Emissions Increase	188	1108	2091	50	225
Significant Emissions Increase	25	40	40	40	100
PSD Review Required	yes	yes	yes	yes	yes

^aRough EPA approximation of fugitive emissions from coal storage and handling.

^bBased upon worst case allowed emissions at full time operating schedule.

^cBased upon actual prior operating time.

Table 3

<u>Facility</u>	Allowable Emission Limits		<u>lb/MMBtu</u>	<u>Basis</u>
	<u>lb/hr</u>	<u>Emission Limits Opacity</u>		
Coal Handling System		20%		NSPS, BACT
Ash Handling System	0.5 ^a	5%		BACT
No. 7 Power Boiler (fueled by coal alone)				
PM	102	20%	0.1	NSPS, BACT
SO ₂	1225		1.2	NSPS, BACT
NO _x	613		0.6 ^{a,c}	BACT ^e
CO	d		d	BACT ^e
No. 7 Power Boiler (with a maximum of 71.3% of heat input from coal and a minimum of 28.6% waste)				
PM	108	20%	0.1	NSPS, BACT
SO ₂	930		1.2 coal ^a 0.01 ww ^a	BACT
NO _x	516		0.6 coal ^{a,c} 0.17 ww ^{a,f}	BACT ^e
CO	d		d d	BACT ^e

^aProposed by applicant.

^bDetermined by EPA consistent with mass rate

^cBased upon manufacturer's guarantee.

^dEmission limits will be determined by compliance testing. Worst case conditions will be used.

^eBACT control is to be established in accordance with Attachment II.

^fBased upon TRW, 1979; Air Pollutant Emission Factors for Wood-Fired Boilers, EPA Contract 68-02-2613, Task No. 30, Durham, NC, Table 3-2, EPA-600/7-79-219.

Table 4
 Analysis of Impacts Upon
 Class II Area PSD Increments

<u>Pollutant/ Averaging Time</u>	<u>Concentrations, ug/m³</u>		<u>Percent of Increment Consumed</u>
	<u>Net Change Modeled</u>	<u>Allowable Increment</u>	
PM			
Annual	-0.3 ^a (-0.2 ^b)	19 ^b	None
24-Hour	1.1	37 ^c	Not Significant
SO ₂			
Annual	1.3	20 ^a	6.5
24-Hour	28.1	91 ^c	30.9
3-Hour	93.3	512 ^c	18.2

^aArithmetic mean.

^bGeometric mean.

^cNot to be exceeded more than once per year.

^dModeled₃ concentration increase (1.1 ug/m³) is below the significance level (5 ug/m³) published 43FR26398 June 19, 1978.

Table 5
 Maximum Modeled Increase to
 Ambient Air at Class I Areas
 (All Concentrations, ug/m³)

	<u>Okefenokee</u>	<u>Wolf Island</u>	<u>Class I Increments</u>
SO ₂			
Annual	0.16	0.15	2
24-Hour	.63	.22	5
3-Hour	1.54	1.75	25
PM			
Annual	Negative	Negative	5
24-Hour	0.01	0.00	10

Table 6
 Analysis of Impacts Upon NAAQS
 (Ambient Concentrations, $\mu\text{g}/\text{m}^3$)

Pollutant/ Averaging Time	Applicant's Analysis			NAAQS ^a	Worst Case Analysis		
	Background	Modeled	Total		Monitored	Modeled	Total
PM							
Annual	39.5 ^d (56.7) ^c	4.5 ^c	44 ^d	60 ^d	Not Required		
24-Hour	86.7	24.7	111.4	150	Not Required		
SO ₂							
Annual	26.1	14.4	40.5	80	46	14	60
24-Hour	75.5	96.0	171.5	365	219	96	315
3-Hour	75.5	374.4	449.9	1300	493 ^e	374	867
NO _x							
Annual	30.0 ^f	3.0	33.0	100			

^aThe lower concentration of either primary or secondary standard.

^bMaximum monitored value excluding measurements identified by Florida DER as caused by known upset at ITT, Rayonier, and excluding measurements made with no temperature control on gas bubbler.

^cArithmetic mean.

^dGeometric mean.

^eNo 3-hour data available; therefore, this is ratioed from 24-hour data.

^fAssumed by applicant as 150% of an EPA suggested value for rural locations.

Table 7
 Allowable Emissions Limits
 for Boiler No. 7

<u>Emission Unit</u>	<u>Maximum Heat Input (MMBtu/hr)</u>	<u>PM</u>	<u>SO₂</u>	<u>NO_x</u>
Boiler No. 7				
Coal Firing	1021			
1b/hr		102	1225	613
1b/MMBtu		0.1	1.2	0.6
Wood Firing	1084			
1b/hr		108	11	184
1b/MMBtu		0.1	0.01	0.17
Combination Wood and Coal	1084			
1b/hr		108	a	b
1b/MMBtu		0.1	a	b

^aThe SO₂ and NO_x emissions limits for combination firing of coal and wood is prorated by the heat input from each fuel fired determined as follows:

$$\text{SO}_2 \text{ Emission Limit in lb/MMBtu} = \frac{\text{Wood Btu Input} \times (0.01) + \text{Coal Btu Input} \times (1.2)}{\text{Total Btu Input}}$$

$$\text{NO}_x \text{ Emission Limit in lb/MMBtu} = \frac{\text{Wood Btu Input} \times (0.17) + \text{Coal Btu Input} \times (0.6)}{\text{Total Btu Input}}$$

GENERAL CONDITIONS

1. The permittee shall notify the permitting authority in writing of the beginning of construction of the permitted source within 30 days of such action and the estimated date of start-up of operation.
2. The permittee shall notify the permitting authority in writing of the actual start-up of the permitted source within 30 days of such action and the estimated date of demonstration of compliance as required in the specific conditions.
3. Each emission point for which an emission test method is established in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the permitting authority of the scheduled date of compliance testing at least thirty (30) days in advance of such test. Compliance test results shall be submitted to the permitting authority within forty-five (45) days after the complete testing. The permittee shall provide (1) sampling ports adequate for test methods applicable to such facility, (2) safe sampling platforms, (3) safe access to sampling platforms, and (4) utilities for sampling and testing equipment.
4. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of two (2) years from the date of recording.
5. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide the permitting authority with the following information in writing within five (5) days of such conditions:
 - (a) description of noncomplying emission(s),
 - (b) cause of noncompliance,
 - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
 - (d) steps taken by the permittee to reduce and eliminate the noncomplying emission,and
 - (e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of this report does not constitute a waiver of the emission limitations contained within this permit.

6. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, modifications to the permit may then be made by the permitting authority to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein.
7. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit by letter and forward a copy of such letter to the permitting authority.
8. The permittee shall allow representatives of the State environmental control agency and/or representatives of the Environmental Protection Agency, upon the presentation of credentials:
 - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Act;
 - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;
 - (d) to sample at reasonable times any emission of pollutants;and
 - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
9. All correspondence required to be submitted by this permit to the permitting agency shall be mailed to the:

Chief, Air Facilities Branch
Air and Hazardous Materials Division
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365
10. The conditions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

The emission of any pollutant more frequently or at a level in excess of that authorized by this permit shall constitute a violation of the terms and conditions of this permit.

USE OF FLUE GAS OXYGEN METER AS BACT FOR
COMBUSTION CONTROLS

Within the time limits specified in General Condition 3 of this permit, the permittee shall determine the emissions of nitrogen oxides and carbon monoxide from the permitted combustion device in accordance with test methods and procedures set out in 40 CFR Part 60, Appendix A, Methods 7 and 10, respectively. These emission determinations shall be made at:

- 1) Maximum design capacity; and
- 2) Normal operational load.

The permittee shall install a continuous oxygen monitor in the flue of the permitted combustion device which meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 3. Results of emission determinations shall be correlated to the flue gas oxygen content to define:

- 1) The point at which Nitrogen Oxides (NO_x) emissions (lb/MMBtu) equals the allowable NO_x emission rate contained in the permit.
- 2) The point at which carbon monoxide (CO) emissions exceed the allowable CO emission rate contained in the permit.

The flue gas oxygen content shall be maintained between these points and alarms shall be set to sound when flue gas oxygen levels exceed either side of this range. Any operation outside of this range will constitute noncompliance with this specific condition, shall be recorded in accordance with General Condition 4 of this permit, and will be reported quarterly along with excess emissions in accordance with 40 CFR 60.7 (c).

Should any combustion equipment modifications be made such as different type burners, combustion air relocation, fuel conversion, tube removal or addition, etc., emissions correlations as described above shall be conducted within 90 days of attaining full operation after such modification. Results of all emission determinations shall be sent to the permitting authority within 90 days after completion of the tests.

Response to Public Comment
Container Corporation of America
PSD-FL 062

A single letter, received from Mr. Charles Whalen, Counsel, Container Corporation of America, questioned several points of understanding. The areas of question and EPA responses are as follows:

Comment 1

Clarification that No. 3 Power Boiler could be brought from a "cold" standby condition if one or more of the larger boilers is out of service; the phrase "in an emergency", which is redundant and perhaps ambiguous, has been deleted (page 1).

Response 1

The phrase "in an emergency" was deleted in the Preliminary Determination. This did not change any meaning of the Determination.

Comment 2

An understanding that "low sulfur coals" are those which by reason of combined sulfur and heat content, result in emissions not exceeding 1.2 lb/MMBtu and hence that the maximum percent sulfur will vary up or down depending upon the heat content of the coal (page 4).

Response 2

The commenter is correct in his statement. The coal to be used is 0.75% sulfur and contains 1.2 pounds of SO₂ per million Btu heat input on a basis of a rolling average on a 30-day basis.

Comment 3

Our mutual understanding that the demonstration of sufficient space for a scrubber need not be provided 30 days prior to the letting of engineering or other contracts; instead, the "beginning of construction" refers to physical, on-site erection activities. (Section VI)

Response 3

The definition of construction, as it pertains to this permit, is fabrication, erection, installation, or modification of a source. The understanding is correct.

Comment 4

Deletion of any VOC emission limit, and of the sentence which might be interpreted as requiring a certain minimum level of wood firing. (Section V4)

Response 4

Uncontrolled emissions of VOC from the plant are less than 100 tons per year and therefore do not require PSD review or limitations. Sentences, phrases, and/or Tables which could be interpreted as requiring a certain minimum level have been deleted.

Comment 5

Clarification in Table 3 that the CO values will be determined by testing of this particular boiler, and not by AP-42 emission factors.

Response 5

The CO emission limits will be determined by compliance testing at worst case conditions. This has been stated as such in Table 3

Comment 6

In Table 7, deletion of the VOC emission limits.

Response 6

VOC emission limits in Table 7 were deleted. They had no PSD value.

Comment 7

Clarification that the sheet "Use of Flue Gas Oxygen Meter as BACT for Combustion Controls" is, in fact, the Attachment II referred to in footnote 3 of Table 3.

Response 7

"Use of Flue Gas Oxygen Meter as BACT For Combustion Controls" has been labeled as Attachment II.

Conclusion

The comments were considered in the development of both the Preliminary and Final Determinations for Container Corporation of America's proposed modification to their existing Fernandina Beach kraft paper mill (PSD-FL-062).

X



STATE OF FLORIDA
 DEPARTMENT OF
 ENVIRONMENTAL REGULATION

CONSTRUCTION
 PERMIT

NO. AC 45-35532 - No. 7 PB

CONTAINER CORPORATION OF
 AMERICA

DATE OF ISSUANCE

March 17, 1981

DATE OF EXPIRATION

SEPTEMBER 30, 1983

Victoria J. Tschinkel

VICTORIA J. TSCHINKEL,
 SECRETARY

Best Available Copy



TWIN TOWERS OFFICE BUILDING
600 BLAIR STONE ROAD
GALLAHASSEE, FLORIDA 32301

BOB GRAY
GOVERNOR
JACOB D. VANCE
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

#7 PB

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-4 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 as 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.

Best Available Copy

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 binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby 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 of 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 projected time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of 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 exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any abatement 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 prohibited 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 in 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 soil, life or property and penalties 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 exercise state ownership in title.
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)

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

Table 2-3
HHV 12500 \Rightarrow .79% S
HHV 13500 \Rightarrow .85% S

9. Maximum emission limits are:

Pollutant	lb/MMBTU	lb/hr	MMBTU/hr
Particulate	0.1	102	1020
SO ₂	1.2	1,225	1020.8
NO _x	0.6	612	1020
Opacity	20% except 27% for one 6 minute period per hour.		

Table 2-1 \Rightarrow 1021

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 after the application for a permit to operate the new boiler is submitted to the Department.

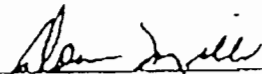
12. Dust suppression systems shall be incorporated in the coal preparation and handling facilities. The system will include: (a) a bottom discharge system employing side curtains and surfactant spray for coal unloading operations; (b) housing the coal crusher in the power boiler building; (c) surfactants 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

PAGE 34 OF 4

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

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

TO: Victoria J. Tschinkel, Secretary, FDER

FROM: *Steve Smallwood*
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.

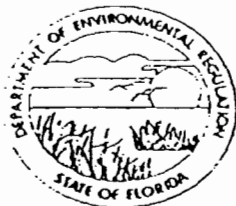
SS:dav

Best Available Copy

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

October 22, 1984

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom V. Brown
Vice President and Resident Manager
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

bcc:P.J. Magnell
L.I. Holmes
C.W. Jenkins
D.R. James
P.E. Trout - Carol Stream
R.C. Cobb - Main Office

Dear Mr. Brown:

North Power Boiler

Re: Amendment to the Construction Permit: AC 45-35532

The Department is in receipt of Ms. Cynthia L. Sawyer's letter dated August 21, 1984, which contained information to support a revision of the original BACT determined NO_x emission limit contained in the above referenced construction permit. Since an amendment revising the original BACT determined NO_x emission limit was signed October 12, 1984, the Department shall make the following changes and additions:

Specific Conditions:

No: 3

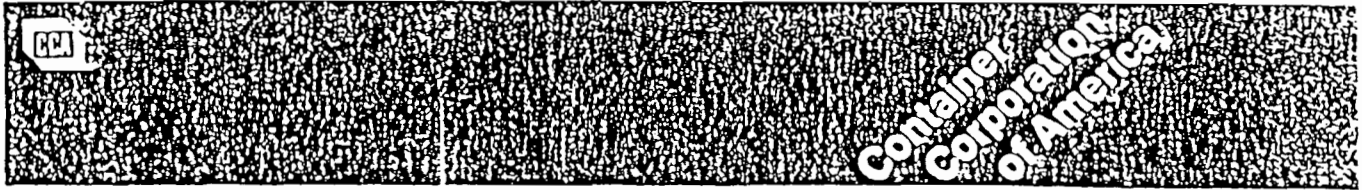
From: Maximum emission limits are:

<u>Pollutant</u>	<u>lb/MMBTU</u>	<u>lb/hr</u>
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.	

To: Maximum emission limits are:

<u>Pollutant</u>	<u>lb/MMBTU</u>	<u>lb/hr</u>
Particulate	0.1	102
SO ₂	1.2	1,225
NO _x	0.7	700
Opacity	20% except 27% for one 6 minute period per hour.	

ATTACHMENT 4



Paper Mill Division

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-5551

BPW

August 21, 1984

Mr. John C. Brown Jr., P.E.
Air Section Supervisor
FDER
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Dear Mr. Brown:

I have reviewed your August 14, 1984 letter in which you stated that we are to submit a written request for a ruling by the Department on whether .49 or .42 lb/MMBTU applies to the NO_x continuous monitoring requirement. This letter will serve as that request. I have also sited specific sections of 40 CFR, Part 60, Subpart D that substantiate our position that .49 lb/MMBTU is the appropriate value for our No. 7 Solid Fossil Fuel Boiler.

In accordance with section 60.45 (b)(3), Subpart D, we elected to delay the installation of a continuous NO_x monitor until after the initial performance tests under section 60.8 were completed. Section 60.45 (b)(3) also states that if the owner or operator demonstrates during the performance test that emissions of nitrogen oxides are less than 70 percent of the applicable standards in section 60.44, a continuous monitoring system for measuring nitrogen oxides emissions is not required. Section 60.44 (a)(3) lists .70 lb per million BTU as the applicable standard for solid fossil fuel boilers. Our performance test showed .43 lb per million BTU or 61 percent of the applicable standard sited above. Therefore, a continuous monitoring system for nitrogen oxides is not required.

Based on the above-referenced sections from New Source Performance Standards we anticipate a favorable ruling by the Department on this matter.

Sincerely,

CONTAINER CORPORATION OF AMERICA

David R. James
Environmental Engineer

DRJ/jrb

*NOTE: Department review indicated
0.48 lb/MMBTU average
JRS*

ATTACHMENT 5

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION
INTEROFFICE MEMORANDUM

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

NORTHEAST DISTRICT, JACKSONVILLE

TO: Clair Fancy, BAQM
FROM: JB John Brown
DATE: August 27, 1984

9/11
Broce - 9/11/84
please investigate i
draft reply, I am
guilty of holding this one.
Clair

SUBJECT: Nassau County - AP
Container Corporation of America
#7 Power Boiler - Permit No. AC45-35532
Ruling on Permit Condition

Please review the attached request from Container to determine whether a continuous monitoring system (CEMS) for nitrogen oxides is required on #7 power boiler.

The construction permit was issued based on 0.60 lb/MMBTU allowable emissions for nitrogen oxides. This would suggest the requirement for a continuous monitoring system if more than 0.36 lb/MMBTU nitrogen oxides were observed during performance tests (60.45 (b)(3), Subpart D, CFR). 0.45 lb/MMBTU were observed during performance testing.

The applicant suggests that the applicable standard in 60.44, Subpart D is 0.70 lb/MMBTU and therefore continuous monitoring is required only if 0.49 lb/MMBTU nitrogen oxides were observed during performance testing.

Please note that the applicant is not contesting the 0.60 lb/MMTU NO_x allowable emissions, but feels that the CEMS should be based on paragraph 60.44(a)(3), Subpart D.

JB:vk



Paper Mill Division

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 004 261-5551

BPW

August 21, 1984

Mr. John C. Brown Jr., P.E.
Air Section Supervisor
FDER
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Dear Mr. Brown:

I have reviewed your August 14, 1984 letter in which you stated that we are to submit a written request for a ruling by the Department on whether .49 or .42 lb/MMBTU applies to the NO_x continuous monitoring requirement. This letter will serve as that request. I have also sited specific sections of 40 CFR, Part 60, Subpart D that substantiate our position that .49 lb/MMBTU is the appropriate value for our No. 7 Solid Fossil Fuel Boiler.

In accordance with section 60.45 (b)(3), Subpart D, we elected to delay the installation of a continuous NO_x monitor until after the initial performance tests under section 60.8 were completed. Section 60.45 (b)(3) also states that if the owner or operator demonstrates during the performance test that emissions of nitrogen oxides are less than 70 percent of the applicable standards in section 60.44, a continuous monitoring system for measuring nitrogen oxides emissions is not required. Section 60.44 (a)(3) lists .70 lb per million BTU as the applicable standard for solid fossil fuel boilers. Our performance test showed .43 lb per million BTU or 61 percent of the applicable standard sited above. Therefore, a continuous monitoring system for nitrogen oxides is not required.

Based on the above-referenced sections from New Source Performance Standards we anticipate a favorable ruling by the Department on this matter.

Sincerely,

CONTAINER CORPORATION OF AMERICA

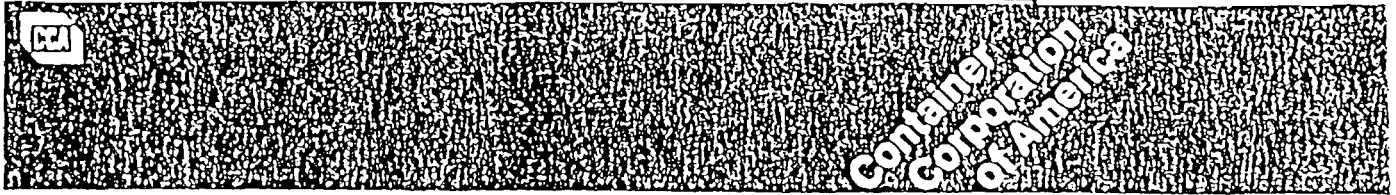
David R. James

David R. James
Environmental Engineer

DRJ/jrb

*NOTE: Department review indicated
0.48 lb/MMBTU average
JRS*

ATTACHMENT 6



Mr. M. D. ...

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-8551

September 13, 1984

Mr. Bruce Mitchell
DER - Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Dear Mr. Mitchell:

As discussed in our phone conversation this morning, this letter is written verification that we do not plan to burn lignite or 25% by weight of coal refuse in No. 7 Coal Fired Power Boiler. No. 7 Power Boiler only burns washed bituminous coal. My understanding from our conversation is this verification will allow the NO_x limit to be changed from .6 lb/mmBTU to .7 lb/mmBTU, because the .6 lb/mmBTU only applies to boilers burning lignite or coal refuse [as stated in 40 CFR 60.44(a)(4)] and will also add a specific condition stating we cannot burn lignite or coal refuse.

If you have any additional questions or comments, please do not hesitate to call.

Sincerely yours,

CONTAINER CORPORATION OF AMERICA

Cynthia L. Sawyer

Cynthia L. Sawyer
Environmental Group Leader

jrb

DER

SEP 21 1984

BAQM

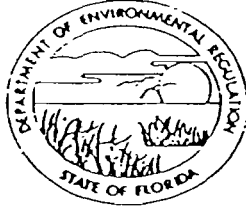
ATTACHMENT 7

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHEAST DISTRICT

300 HILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

G. DOUG DUTTON
DISTRICT MANAGER

September 14, 1984

Ms. Cynthia Sawyer
Environmental Group Leader
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

Dear Ms. Sawyer:

Nassau County - AP
Container Corporation of America
No. 7 Power Boiler
Nitrogen Oxides and SO₂ Monitoring Requirement

The following information is provided to document the conversations with Mr. Bruce Mitchell and me on September 13, 1984.

Mr. Mitchell has indicated that he is willing to modify the construction permit for No. 7 power boiler to require an emissions limiting standard of 0.70 lb/10⁶ BTU per CFR 40, Section 60.44(a)(3) subject to the following:

1. Certification that you have not used, are not using, and will not utilize lignite or a solid fossil fuel containing 25 percent by weight, or more of coal refuse.
2. That the permit condition be changed to limit future use of No. 7 power boiler to the fuel input specified by 40 CFR, Section 60.44(a)(3).

Please note that we have not received the additional information required for completion of the operating permit review for No. 7 power boiler. Also, please expedite the request for approval of your alternate method for monitoring sulfur dioxide.

Ms. Cynthia Sawyer
September 14, 1984
page two

Failure to complete the action required to obtain the operating permit for No. 7 power boiler most expeditiously will necessitate enforcement action by the Department.

Please send me copies of all letters to the Bureau of Air Quality Management and EPA.

Your cooperation is appreciated.

Sincerely,

John C. Brown, Jr.
John Brown, P.E.
Supervisor Air Section

DFK

JB:vk

cc: Bruce Mitchell
Enforcement

ATTACHMENT 8

Best Available Control Technology (BACT) Determination
Container Corporation of America
Nassau County
Amendment

This amended BACT determination revises only the NO_x emission limit contained in the BACT determination dated December 30, 1980.

The affected source is a 1000 million Btu per hour heat input coal/wood waste fired steam generator (power boiler No. 7) installed at the applicant's plant site located on the inland side of Amelia Island.

BACT Determination Requested by the Applicant:

<u>Pollutant</u>	<u>Emission Limit</u>
Nitrogen Oxides	0.7 lb/million Btu heat input

Date of Receipt of a Complete BACT Application:

December 12, 1980

Date of Publication in the Florida Administrative Weekly:

December 19, 1980

Review Group Members:

The revised determination was based upon comments received from the New Source Review Section and the Northeast District.

BACT Determination by DER:

<u>Pollutants</u>	<u>Emission Limit</u>
Nitrogen Oxides (NO _x)	0.7 lb/million Btu heat input based on the gross calorific value of the fuel combusted.

Compliance with the nitrogen oxide emission limitation will be in accordance with the applicable test methods and procedures as set forth in Subsection 60.46, New Source Performance Standards (NSPS), Subpart D.

BACT Determination Rationale:

The December 30, 1980 BACT determination was based on the NSPS, 40 CFR 60.40, Subpart D. Rationale for the NO_x standard was based on Subsection 60.44(a)(4) of the NSPS, or 0.60 lb NO_x per million Btu derived from lignite or lignite and wood residue.

The applicant has submitted a letter indicating that no lignite will be fired in power boiler No. 7, only coal and wood residue. The applicant, therefore, requests that the NSPS, Subsection 60.44(a)(3), be the limiting standard for NO_x emissions, that is 0.70 lb NO_x per million Btu heat input derived from solid fossil fuel or solid fossil fuel and wood residue (except lignite or a solid fossil fuel containing 25%, by weight, or more of coal refuse).

The New Source Performance Standards, Subpart D, Subsection 60.45(b)(3) states: that if the owner or operator demonstrates during the performance test that emissions of nitrogen oxides are less than 70 percent of the applicable standard in Subsection 60.44, continuous NO_x monitoring is not required. The performance test for power boiler No. 7 was 0.43 lb NO_x per million Btu or 61.4 percent based on the 0.7 standard and 71.6 percent based on the 0.6 standard. No continuous NO_x monitoring will be required if the emission limit is changed as requested. The actual NO_x emitted will be unaffected.

The Department agrees with the applicants request and has revised the NO_x emission limit as per specific condition 9 of their construction permit, No. AC 45-35532. All other air pollutant emission limits, based upon the December 30, 1980 BACT determination, are not to be changed.

Air quality modeling predicts no violation of any PSD increment or ambient air quality standard resulting from the revised NO_x emission limit.

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:

C. H. Fancy
C. H. Fancy, Deputy Bureau Chief

Date: 10/11/84

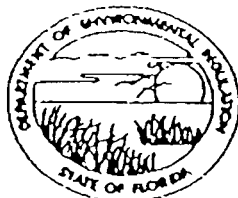
Approved By:

Victoria J. Tschinkel
Victoria J. Tschinkel, Secretary

Date: 10/12/84

EFP/agh

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



ST. JOHNS RIVER
RECEIVED
MAR 17 1981
SUB DISTRICT - JAX

BOB GRANT
GOVERNOR
COB D. VAN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

JK

March 13, 1981

Richard W. Galphin
General Manager
Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

*Nassau Co - AP
EPA
#7 PB*

Enclosed is Permit Number AC 45-35532, dated March 12, 1981
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,

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

L

EMISSION UNIT 7

TALL OIL PLANT

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <p style="text-align: center;">Tall Oil Plant</p>			
4. Emissions Unit Identification Number: [] No ID ID: 020 [] ID Unknown			
5. Emissions Unit Status Code: A	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 26	8. Acid Rain Unit? []
9. Emissions Unit Comment: (Limit to 500 Characters) <p style="text-align: center;">Consists of an acidulator, lignin tank, and saltcake storage tank.</p>			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Packed-Gas Adsorption Column

2. Control Device or Method Code(s): **50**

Emissions Unit Details

1. Package Unit:		
Manufacturer:		Model Number:
2. Generator Nameplate Rating: MW		
3. Incinerator Information:		
	Dwell Temperature:	°F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	mmBtu/hr				
2. Maximum Incineration Rate:	lb/hr tons/day				
3. Maximum Process or Throughput Rate:	See Comment				
4. Maximum Production Rate:	17,000 lb/hr Tall Oil				
5. Requested Maximum Operating Schedule:					
	<table> <tr> <td>24 hours/day</td> <td>7 days/week</td> </tr> <tr> <td>52 weeks/year</td> <td>8,760 hours/year</td> </tr> </table>	24 hours/day	7 days/week	52 weeks/year	8,760 hours/year
24 hours/day	7 days/week				
52 weeks/year	8,760 hours/year				
6. Operating Capacity/Schedule Comment (limit to 200 characters):					
<p>Max Process/Throughput Rate: 24,573 lb/hr soap; 3,866 lb/hr sulfuric acid; 5,872 lb/hr caustic. Maximum production rate is a 12-hr average. The production rate is based on the number of tons of Tall Oil per batch and a batch time of 4 hours.</p>					

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)****List of Applicable Regulations**

62-296.404(3)(b)
62-296.404(4)(d)
62-296.404(4)(f)
62-296.404(5)(d)
62-296.404(6)(a)
62-296.404(6)(b)
62-296.404(6)(c)3.
62-296.404(6)(c)4.
62-296.404(6)(d)
62-297.310
62-297.401(1)(a)
62-297.401(2)
62-297.401(3)
62-297.401(4)
62-297.401(16)
62-297.401(16)(a)

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 020		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
10. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 52 feet	7. Exit Diameter: 1.7 feet	
8. Exit Temperature: 115 °F	9. Actual Volumetric Flow Rate: 4,500 acfm	10. Water Vapor: 12 %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Consists of an acidulator, lignin tank, and saltcake tank all vented to a wet scrubber. Stack parameters updated from recent stack test data.			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Chemical Manufacturing, Other Not Classified: Tall Oil Production		
2. Source Classification Code (SCC): 3-01-999-99		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 8.5	5. Maximum Annual Rate: 74,460	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
16. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: TRS		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.43 lb/hour		4. Synthetically Limited? []	
		1.9 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.05 lb/ton		7. Emissions Method Code: 0	
Reference: 62-296.404(3)(b)1.			
8. Calculation of Emissions (limit to 600 characters): 0.05 lb/ton tall oil x 8.5 tons/hr = 0.43 lb/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): TRS emissions as 12-hour average.			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.05 lb/ton		4. Equivalent Allowable Emissions: 0.43 lb/hour 1.9 tons/year	
5. Method of Compliance (limit to 60 characters): Stack test every 5 years using EPA Method 16 or 16A.			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Requested Allowable Emissions and Units: 0.05 lb/ton tall oil, 12-hr avg. Rule 62-296.404(3)(b)1.			

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 2

1. Parameter Code: FLOW	2. Pollutant(s):
3. CMS Requirement:	[X] Rule [] Other
4. Monitor Information: Manufacturer: Yamatake-Honeywell Model Number: K1X18B/E1XX2TY Serial Number: D/29F34/41/145	
5. Installation Date: 01 Dec 1994	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Rule 62-296.404(5)(d). Scrubber liquid flow as surrogate parameter: 322 gpm, minimum 12-hr avg.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 2 of 2

1. Parameter Code: pH	2. Pollutant(s):
3. CMS Requirement:	[<input checked="" type="checkbox"/>] Rule [] Other
4. Monitor Information: Manufacturer: Yokogawa Model Number: PH200G Serial Number: 812841	
5. Installation Date: 01 Dec 1994	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): FAC Rule 62-296.404(5)(d). pH as surrogate parameter; pH = 11.75 S. U. minimum. Note: JSC has requested an alternative monitoring method to obtain 3 grab samples per cook.	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

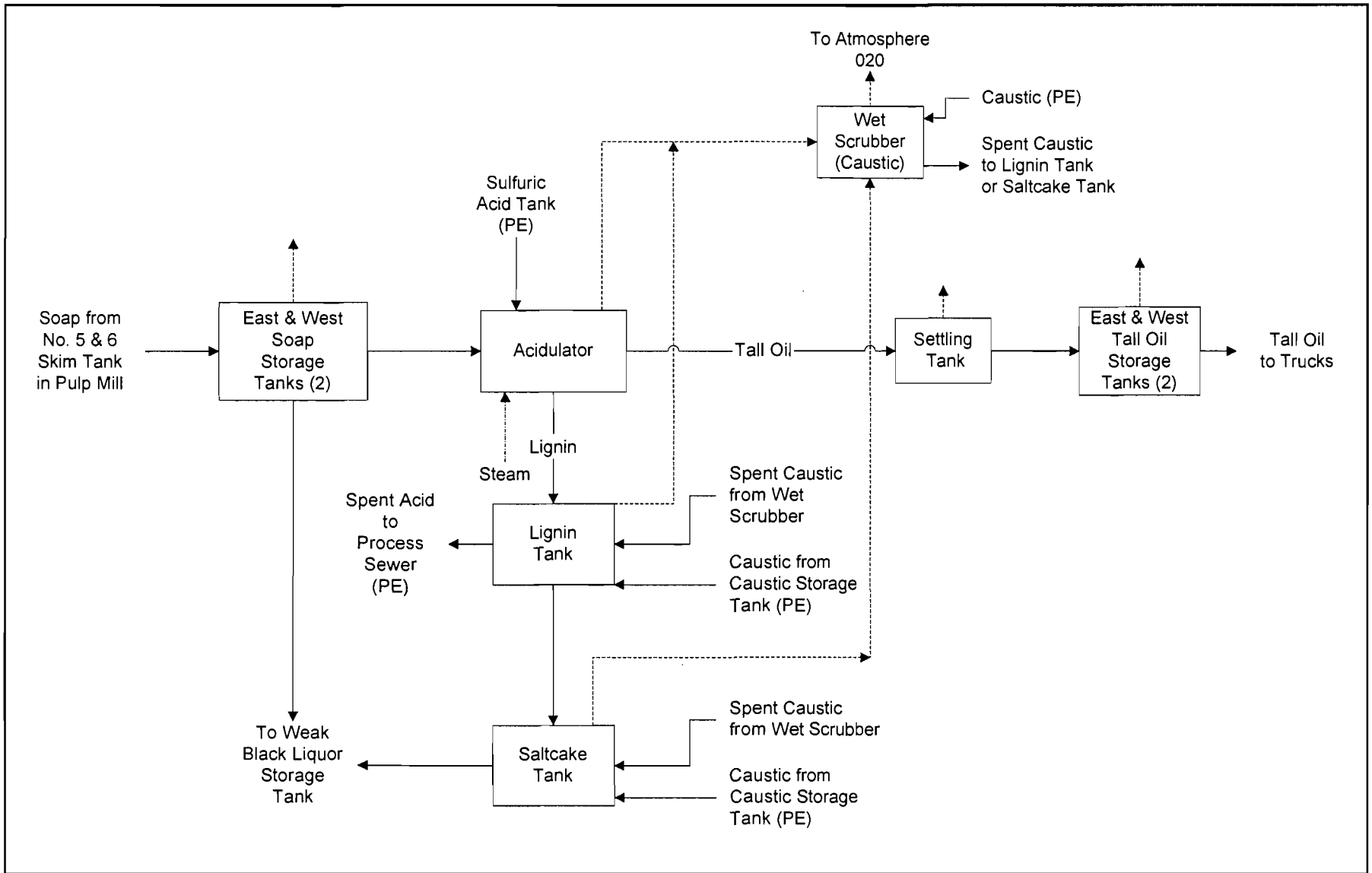
Supplemental Requirements

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU7-J1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU7-J3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

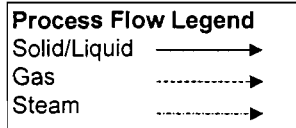
Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU7-J13</u> <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT JSF-EU7-J1
PROCESS FLOW DIAGRAM



Attachment JSF-EU7-J1
 Tall Oil Plant
 Process Flow Diagram
 Jefferson Smurfit Corporation
 Fernandina Beach, FL



Filename: 0237609/4/4.4/4.4.1/JSF-EU7-J1.vsd
 Date: 12/13/02



ATTACHMENT JSF-EU7-J3
DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT JSF-EU7-J3

**CONTROL EQUIPMENT PARAMETERS
TALL OIL PLANT PACKED GAS ABSORPTION TOWER**

Manufacturer and Model No.	<u>Air Pollution, Inc.</u>		
Date of Installation	<u>February 1989</u>		
Inlet Gas Temperature	<u>140</u>		°F
Inlet Gas Flow Rate	<u>5,042</u>		acfm
Outlet Gas Temperature	<u>117</u>		°F
Outlet Gas Flow Rate	<u>5,040</u>		acfm
Pressure Drop Across Device	<u>4</u>		inches of H ₂ O
Scrubbing Media	<u>Caustic</u>		
Scrubbing Media Flow Rate	<u>350</u>		gpm
Scrubbing Media Supply Pressure – Normal	<u>9</u>		psig
Average Scrubbing Media pH	<u>12</u>		pH units
Maximum Permitted Reduced Sulfur Emissions*	<u>0.43</u>		lb/hr
<u>Pollutants</u>	<u>Inlet Loading</u>	<u>Outlet Loading</u>	<u>Control Efficiency</u>
Total Reduced Sulfur	40.8 lb/hr	0.43 lb/hr	90 %

*Value obtained from Permit No. 0890003-001-AV.

ATTACHMENT JSF-EU7-J13

IDENTIFICATION OF ADDITIONAL APPLICABLE REQUIREMENTS

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



October 12, 2001

0137599

Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256

Attention: Mr. Christopher L. Kirts, P.E., District Air Program Administrator

RE: JEFFERSON SMURFIT CORPORATION
FERNANDINA BEACH MILL
TITLE V REVISION REQUEST
PERMIT NO. 0890003-001-AV

Dear Mr. Kirts:

Jefferson Smurfit Corporation (JSC) is submitting this request for a revision to the Final Title V Permit No. 0890003-001-AV for the Fernandina Beach Mill. The Final Title V Permit was issued June 15, 1998. The purpose of this request is to incorporate the facility changes made for compliance with standards in 40 CFR Part 63, Subpart S (MACT I). The changes made for MACT I compliance were permitted through construction permit No. 0890003-003-AC. Specifically, JSC requests that the following items be incorporated into the Title V permit:

- Replacement of the existing turpentine decanter, weir box, and turpentine storage tank with a new turpentine decanter, weir box, and turpentine storage tank.
- Addition of a new foul condensate collection tank.
- Collection of low volume high concentration (LVHC) noncondensable gases (NCGs) from the new turpentine decanter, weir box, turpentine storage tank, foul condensate tank and the Kamyrr blow tank and tie in with existing NCG collection system.
- Addition of a new NCG burner nozzle on the No. 5 Power Boiler, so the boiler can be used as the backup device to the No. 4 Lime Kiln for NCG destruction. The sulfur dioxide (SO₂) emissions from NCG destruction in the No. 5 Power Boiler can be offset by burning lower sulfur content fuel.
- Addition of total reduced sulfur (TRS) and SO₂ emission limits for the No. 5 Power Boiler.

JSC is also requesting several other administrative corrections to the Title V permit. These requests are described below, referenced by Title V permit condition.

Section III, Subsection A. No. 5 Power Boiler

A.1. Consistent with other Title V permits issued recently, it is requested that the maximum operation rate be specified as a 24-hour block average.

A.2. Specify the "Carbonaceous fuel only" operating scenario as a "24-hr" basis. JSC is also requesting that a formula in the MACT I construction permit, No. 5 Power Boiler emissions unit, be revised and incorporated into the Title V Operating Permit. JSC is requesting that the following formulas replace the existing formulas in Condition 3.b. of Permit No. 0890003-003-AC:

$$\%S \times 8.2 \text{ lb/gal} \times 2 \text{ lb SO}_2/\text{lb S} = (16.4 \times (S \text{ lb}/100 \text{ lb oil})) \text{ lb SO}_2/\text{gal} = (0.164 \times S) \text{ lb SO}_2/\text{gal}$$
$$(0.164 \times S) \text{ lb SO}_2/\text{gal} \times \text{gallons of fuel oil fired} = \text{lb SO}_2$$

where, S= sulfur content of oil in percent

A letter formally requesting this revision has been submitted to the Department by Golder Associates, Inc.

Section III, Subsection B. No. 4 Recovery Boiler

B.1. To reduce the recordkeeping burden, it is requested that the maximum operation rate be specified as a 24-hour block average.

B.2. Specify the operating rates as a "24-hr" basis.

Section III, Subsection C. No. 5 Recovery Boiler

C.1. To reduce the recordkeeping burden, it is requested that the maximum operation rate be specified as a 24-hour block average.

C.2. Specify the operating rates as a "24-hr" basis.

Section III, Subsection D. No. 4 Smelt Dissolving Tank

D.1. Consistent with the request for the No. 4 Recovery boiler, it is requested that the maximum operation rate be specified as a 24-hour block average.

Section III, Subsection E. No. 5 Smelt Dissolving Tank

E.1. Consistent with the request for the No. 5 Recovery boiler, it is requested that the maximum operation rate be specified as a 24-hour block average.

Section III, Subsection F. No. 7 Power Boiler

F.1. Consistent with other Title V permits issued recently, and to reduce recordkeeping burden, it is requested that the maximum operation rate be specified as a 24-hour block average.

F.2. Specify the maximum operating rates as a "24-hr block average" basis.

F.21. Specify the oxygen set point as a "24-hour block average".

F.22. Specify the oxygen set point as a "24-hour block average".

F.23. Reword "package boiler condition J.1." to "boiler common condition J.1."

Section III, Subsection G. Tall Oil Plant

G.5. JSC has experienced difficulty in operating and maintaining a continuous pH monitoring device. Inline pH meters have been proven very difficult to maintain in such a caustic environment. Rule

296.404(5)(d) does not require that continuous monitoring devices be implemented, but only that appropriate surrogate parameters be established and monitored. JSC therefore proposes to monitor for pH by taking 3 grab samples over the course of each tall oil cook. Each grab sample would be compared with the surrogate limit of 11.75 S.U. to determine compliance. The pH does not vary significantly over a cook. JSC has been collecting grab samples in addition to the continuous monitor data for some time.

Section III, Subsection H. No. 4 Lime Kiln

H.1. It is requested that the returned lime production rate (output) be specified as 630 tons per day (TPD), based on permit no. AC45-141877. In addition, it is requested that the lime mud input rate be deleted, as this is not measured directly and is not necessary. The underlying construction permit only limits the lime production rate, while stating the "corresponding" lime mud input rate.

H.3. Please refer to the Title V revision application, Attachment JSC-EU1-B6 for the correct maximum operating hours for each emissions unit addressed within this subsection. These are derived from previous construction permits. Please revise this condition to reflect the maximum operating hours.

Section III, Subsection I. C-Line Brownstock Washer System

I.1. Consistent with other Title V permits issued recently, and to reduce recordkeeping burden, it is requested that the maximum operation rate be specified as a 24-hour block average.

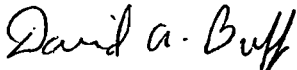
MACT SSM Plan

The MACT general provisions, 40 CFR 63, Subpart A require that the facility's startup, shutdown and malfunction (SSM) plan be incorporated by reference into the facility's Title V permit. It is requested that JSC's SSM plan be incorporated into the revised Title V permit. The SSM plan is attached to the Title V revision application.

Thank you for your consideration in this matter. If you have any questions concerning this request, please call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.

Principal Engineer

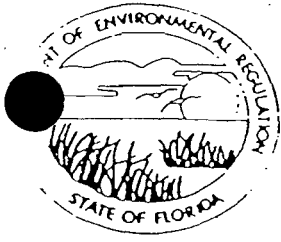
Florida P. E. #19011

SEAL

DB/SLW/jkw

Enclosures

cc: B. Crews, Jefferson Smurfit Corporation



bcc: CL Hardy (original for file)
RC Cobb - Clayton Legal
RH Williams - Jacksonville
RL Caffo
RP Hagan

Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

May 26, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul J. Magnell
General Manager
Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

FERNANDINA MILLS

JUN 2 1988

RECEIVED

Dear Mr. Magnell:

Re: Amendments to Construction Permits
AC 45-141871, -141872, -141874, and -141875

The Department received your letter dated May 2, 1988, requesting that the above referenced permits be amended to incorporate specific conditions that have been recently agreed to with other pulp and paper mills.

A. For the digester systems, the following will be changed:

1. AC 45-141871: Kamyrdigester System

Specific Condition

No. 2:

From: The maximum production rate of the Kamyrdigester system shall not exceed 85 tons per hour of air dried pulp and based on a nominal utilization rate of 300,104 lbs/hr wood chips (dry) and 1,573,191 lbs/hr black/white liquor. For PSD purposes, the maximum production rate shall not exceed 1819 TPD ADP.

To: For testing purposes and NSPS applicability purposes, the maximum production rate of the Kamyrdigester system will be 85 TPH ADP (tons per hour of air-dried pulp). Tests for compliance will be performed with the control device (No. 4 lime kiln) operating at 90-100% of the maximum rate and with the Kamyrdigester system operating as near the maximum production rate as possible, but no less than 85% of the maximum rate. For PSD purposes, the maximum production rate

Mr. Paul J. Magnell
Page Two
May 26, 1988

of the Kamyr digester system will be 1,819 TPD ADP (tons per day of air dried pulp; based on a nominal utilization rate of 3,210 TPD of wood chips (dry) and 12,830 TPD of cooking liquor (dry)).

2. AC 45-141872: Batch Digester System

Specific Condition

No. 2:

From: The maximum production rate of the batch digester system shall not exceed 101.5 tons per hour of air dried pulp and based on a nominal utilization rate of 392,305 lbs/hr wood chips (dry) and 819,918 lbs/hr of black/white liquor. For PSD purposes, the maximum production rate shall not exceed 1391 TPD ADP.

To: For testing purposes and NSPS applicability purposes, the maximum production rate of the batch digester system will be 101.5 TPH ADP (tons per hour of air dried pulp). Tests for compliance will be performed with the control device (No. 4 lime kiln) operating at 90-100% of the maximum rate and with the batch digester system operating as near the maximum production rate as possible, but no less than 85% of the maximum rate. For PSD purposes, the maximum production rate of the batch digester system will be 1,391 TPD ADP (tons per day of air dried pulp; based on a nominal utilization rate of 2,690 TPD of wood chips (dry) and 5,620 TPD of cooking liquor (dry)).

B. Due to the refinement of some Specific Conditions associated with TRS source permitting and a phone conversation with Mr. Roger Hagan on May 20, 1988, the following will be changed:

1. AC 45-141874: Tall Oil Plant and Control System

Specific Condition

No. 6:

From: The permittee shall provide proof of final compliance to the DER's Northeast District office by May 12, 1989, pursuant to FAC Rule 17-2.960(1)(d)1.b.

Mr. Paul J. Magnell
Page Three
May 26, 1988

To: Pursuant to FAC Rule 17-2.960(1), the Tall Oil Plant shall be in final compliance by May 12, 1989, and the permittee shall provide proof of final compliance to the DER's Northeast District office by June 26, 1989.

2. AC 45-141875: No. 4 Smelt Dissolving Tank

Specific Condition

No. 7:

From: The permittee shall provide proof of compliance with FAC Rule 17-2.960(1), by May 12, 1989, to the DER's Northeast District office.

To: Pursuant to FAC Rule 17-2.960(1), the No. 4 SDT shall be in final compliance by May 12, 1989, and the permittee shall provide proof of final compliance to the DER's Northeast District office by June 26, 1989.

C. Since a major modification initiates new source review pursuant to FAC Rules 17-2.500 and 17-2.510 if a pollutant exceeds the significant level contained in FAC Rule 17-2, Table 500-2, then this threshold level, which for TRS is 10 TPY, will be compared to the source's annual allowable TRS emission limit to determine the necessity for requiring annual compliance testing for TRS mass emissions. If the allowable TRS emission limit is greater than 10 TPY, an annual compliance test is required. Therefore, the following will be changed:

1. AC 45-141874: Tall Oil Plant and Control System

Specific Condition

No. 4:

From: Initial and annual compliance tests shall be conducted using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

To: An initial compliance test shall be conducted using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Best Available Copy

Mr. Paul J. Magnell
Page Four
May 26, 1988

2. AC 45-141875: No. 4 Smelt Dissolving Tank

Specific Condition

No. 6:

From: Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:

- a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources
- b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources
- c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

- To:
- a. Initial and annual compliance tests for PM and visible emissions shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:
 - 1) EPA Method 5, Determination of Particulate Emissions from Stationary Sources
 - 2) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources
 - b. An initial compliance test for TRS shall be conducted using the following test method in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:
 - 1) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

Attachment to be Incorporated:

A. AC 45-141871 and -141872

- 11. Mr. Paul J. Magnell's letter dated May 2, 1988, and received May 6, 1988.

Best Available Copy

Mr. Paul J. Magnell
Page Five
May 26, 1988

B. AC 45-141874

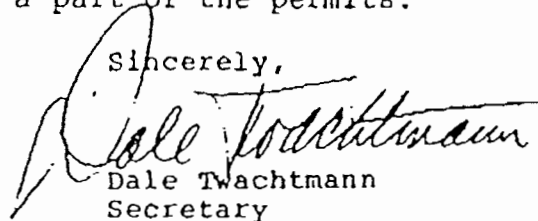
7. Mr. Paul J. Magnell's letter dated May 2, 1988, and received May 6, 1988.

C. AC 45-141875

8. Mr. Paul J. Magnell's letter dated May 2, 1988, and received May 6, 1988.

This letter must be attached to the appropriate construction permits and shall become a part of the permits.

Sincerely,



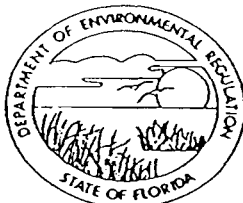
Dale Twachtmann
Secretary

DT/ks

cc: B. Stewart, NE District
B. Williams, JSC
R. Hagan, CCA
B. Pittman, Esq., DER

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

4/18/88

4/18/88

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

Permit Number: AC 45-141874
Expiration Date: September 24, 1989
County: Nassau
Latitude/Longitude: 30° 40' 53"N
81° 27' 26"W
Project: Tall Oil Plant and
Control System

This permit is issued under the provisions of Chapter 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:

For the permitting of the Tall Oil Plant and the construction of a new wet scrubber control system to control pollutant emissions from the acidulator, the lignin tank and the saltcake tank. The scrubber system will be a packed tower type and will use a solution of caustic soda as the absorbing medium. The location of the project will be at the permittee's existing facility. The UTM coordinates are Zone 17, 456.2 km East and 3394.2 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Tall Oil Plant 3-07-001-99

Construction will be in accordance with the permit application, plans, documents, and reference materials submitted unless otherwise stated in the General and Specific Conditions.

Attachments to be Incorporated:

1. Application to construct air pollution sources received November 12, 1987.
2. Mr. C. H. Fancy's letter dated December 10, 1987.
3. Mr. Paul J. Magnell's letter dated December 17, 1987, and received December 24, 1987.
4. Mr. Paul J. Magnell's letter dated January 15, 1988, and received January 19, 1988.
5. Technical Evaluation and Preliminary Determination dated March 1, 1988.
6. Bruce Mitchell's Interoffice Memorandum dated March 15, 1988.

PERMITTEE:
Container Corporation of
America

Permit Number: AC 45-141874
Expiration Date: September 24, 1989

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 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, unless specifically authorized by an order from the Department.

PERMITTEE:
Container Corporation of
America

Permit Number: AC 45-141874
Expiration Date: September 24, 1989

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 of
America

Permit Number: AC 45-141874
Expiration Date: September 24, 1989

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 noncompliance 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)
- () 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 of
America

Permit Number: AC 45-141874
Expiration Date: September 24, 1989

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. The Tall Oil Plant may operate continuously (i.e., 8760 hrs/yr).

2. The maximum production rate shall not exceed 17,000 lbs/hr of tall oil (based on a process input of 24,573 lbs/hr soap, 3,866 lbs/hr Sulfuric Acid, and 5,872 lbs/hr caustic).

PERMITTEE:
Container Corporation of
America

Permit Number: AC 45-141874
Expiration Date: September 24, 1989

SPECIFIC CONDITIONS:

3. In accordance with Florida Administrative Code (FAC) Rule 17-2.600(4)(c)2., total reduced sulfur (TRS) emissions from the Tall Oil Plant shall not exceed 0.05 lb/ton crude tall oil produced as a 12-hour average (0.43 lb/hr or 1.9 TPY). A caustic scrubber shall be used to control TRS emissions continuously.

4. Initial and annual compliance tests shall be conducted using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

5. Objectionable odors shall not be allowed off of plant property in accordance with FAC Rule 17-2.620(2).

6. The permittee shall provide proof of final compliance to the DER's Northeast District office by May 12, 1989, pursuant to FAC Rule 17-2.960(1)(d)1.b.

7. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

8. Pursuant to FAC Rule 17-2.600(4)(c)2.b., the Tall Oil Plant is subject to the provisions of FAC Rule 17-2.710, Continuous Monitoring Requirements, which includes FAC Rules 17-2.710(3), General Requirements and Establishing Specific Surrogate Parameters, and 17-2.710(4), Quarterly Reporting Requirements. The source is subject to the provisions of FAC Rule 17-4.140, Reports.

9. The project is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

10. The DER's Northeast District office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the NE District office within 45 days of test completion.

11. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the

PERMITTEE:
Container Corporation of
America

Permit Number: AC 45-141874
Expiration Date: September 24, 1989

SPECIFIC CONDITIONS:

specific surrogate parameters to be monitored, and the Certificate of Completion, to the DER's Northeast District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. (FAC Rules 17-2 and 17-4)

If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease. (FAC Rule 17-4)

12. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to the DER's Bureau of Air Quality Management office and Northeast District office.

13. The Tall Oil Plant is subject to the provisions of FAC Rule 17-2.971(2)(c), Compliance Schedules for Continuous Monitoring Requirements, which requires compliance by August 12, 1989.

Issued this 18 day of April,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann
Dale Twachtmann, Secretary

EMISSION UNIT 8

NO. 4 LIME KILN

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <p style="text-align: center;">No. 4 Lime Kiln</p>			
4. Emissions Unit Identification Number: ID: 021		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code: A	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 26	8. Acid Rain Unit? <input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters) <p>Consists of the No. 4 Lime Kiln and Nos. 1 and 2 Lime Bins. TRS/HAP gases from the Pulping System – MACT I emissions unit (EU 033) are routed to the No. 4 Lime Kiln or the No. 5 Power Boiler for destruction.</p>			

Emissions Unit Control Equipment

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p> <p>NCG Gases destroyed in No. 4 Lime Kiln or No. 5 Power Boiler as a backup.</p> <p>Electrostatic Precipitator</p> <p>Bag Fabric Filters – High Temperature (one for each Lime Bin)</p>
<p>2. Control Device or Method Code(s): 021, 010, 016</p>

Emissions Unit Details

<p>1. Package Unit: Manufacturer: _____ Model Number: _____</p>						
<p>2. Generator Nameplate Rating: _____ MW</p>						
<p>3. Incinerator Information:</p> <table style="width: 100%; border: none;"> <tr> <td style="text-align: right; padding-right: 20px;">Dwell Temperature:</td> <td style="text-align: right;">°F</td> </tr> <tr> <td style="text-align: right; padding-right: 20px;">Dwell Time:</td> <td style="text-align: right;">seconds</td> </tr> <tr> <td style="text-align: right; padding-right: 20px;">Incinerator Afterburner Temperature:</td> <td style="text-align: right;">°F</td> </tr> </table>	Dwell Temperature:	°F	Dwell Time:	seconds	Incinerator Afterburner Temperature:	°F
Dwell Temperature:	°F					
Dwell Time:	seconds					
Incinerator Afterburner Temperature:	°F					

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	170.63	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	See Comment	
4. Maximum Production Rate:	See Comment	
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,736 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
	See Attachment JSF-EU8-B6.	

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CFR 60.11(a)
40 CFR 60.11(d)
40 CFR 60.11(f)
40 CFR 60.12
40 CFR 60.13(a)
40 CFR 60.13(b)
40 CFR 60.13(c)(2)
40 CFR 60.13(d)(1)
40 CFR 60.13(e)(2)
40 CFR 60.13(f)
40 CFR 60.19
40 CFR 60.282(a)(3)(ii)
40 CFR 60.283(a)(5)
40 CFR 60.284(a)(2)
40 CFR 60.284(c)(1)
40 CFR 60.284(c)(2)
40 CFR 60.284(c)(3)
40 CFR 60.284(d)(2)
40 CFR 60.284(e)(2)
40 CFR 60.285(a)
40 CFR 60.285(b)
40 CFR 60.285(d) – Test Methods and Procedures
40 CFR 60.285(f) – Test Methods and Procedures
40 CFR 60.7
40 CFR 60.8
62-204.800(7)(b)35. – NSPS by Reference for Kraft Pulp Mills
62-296.320(4)(b)1. – General VE Limitation
62-296.404(3)(e) – Lime Kilns and Calciners
62-296.404(4)(b) – Lime Kilns and Calciners
62-296.404(4)(f) – Test Procedures
62-296.404(5)(a)
62-296.404(5)(b)1. – Continuous TRS Monitoring

C. EMISSIONS UNIT REGULATIONS

62-296.404(6) – Quarterly Reporting
62-296.404(6)(a)
62-296.404(6)(b)
62-296.404(6)(c)2.
62-296.404(6)(c)4.
62-296.404(6)(d)
62-297.310
62-297.401(1)(a)
62-297.401(16)
62-297.401(16)(a)
62-297.401(2)
62-297.401(3)
62-297.401(4)
62-297.401(5)
62-297.401(9)
62-297.620(4) – VE limit on Nos. 1-2 Lime Bins
40 CFR 63, Subpart A – General Provisions
40 CFR 63.443(d)(4) – MACT Standards – HAP Reduction in Lime Kiln

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 021		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
11. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 101 feet	7. Exit Diameter: 3.1 feet	
8. Exit Temperature: 371 °F	9. Actual Volumetric Flow Rate: 78,000 acfm	10. Water Vapor: 31 %	
11. Maximum Dry Standard Flow Rate: 40,105 dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Stack parameters updated from recent stack test data. Flow rate calculated based on the ratio of maximum production rate to actual operating rate during stack test. Maximum dry standard flow rate is at 4-percent O₂.			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products, Sulfate (Kraft) Pulping, Lime Kiln: General		
2. Source Classification Code (SCC): 3-07-001-06		3. SCC Units: Tons Air-Dried Unbleached Pulp Produced
4. Maximum Hourly Rate: 186	5. Maximum Annual Rate: 1,627,320	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): See Attachment JSF-EU8-E10. Max Annual Rate is based on sum of maximum production rates for the Kamyr Digester System and the Batch Digester System.		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): In-Process Fuel Use; Residual Oil; Lime Kiln		
2. Source Classification Code (SCC): 3-90-004-03		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 1.1768	5. Maximum Annual Rate: 10,281	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 3	8. Maximum % Ash:	9. Million Btu per SCC Unit: 145
10. Segment Comment (limit to 200 characters): Maximum Annual Rate based on 8,736 hr/yr. Residual oil may include No. 6 fuel oil and on-spec used oil.		

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): In-Process Fuel Use, Liquified Petroleum Gas (LPG): General		
2. Source Classification Code (SCC): 3-09-010-89		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 0.085	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 92.5
10. Segment Comment (limit to 200 characters): Fuel used for startup only; therefore, an annual rate is inappropriate.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control:
3. Potential Emissions: 43.5 lb/hour 190.0 tons/year	4. Synthetically Limited? [<input checked="" type="checkbox"/>]
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.13 gr/dscf @ 10% O₂ Reference: Permit Limit	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): Based on Permit Limit. Emissions limited to lesser of lb/hr or grain loading.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Synthetically limited by hours of operation, 8,736 hrs/yr.	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: ESCPD	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 43.5 lb/hr	4. Equivalent Allowable Emissions: 43.5 lb/hour 190.0 tons/year
5. Method of Compliance (limit to 60 characters): Annual source test using EPA Method 5.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Permit limit in Permit No. 0890003-001-AV.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour _____ tons/year _____		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.13 gr/dscf		4. Equivalent Allowable Emissions: 43.5 b/hour 190.0 tons/year	
5. Method of Compliance (limit to 60 characters): Annual Source test using EPA Method 5.			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Requested Allowable Emissions corrected to 10% O₂ when liquid fossil fuel is fired, 40 CFR 60.285(a)(3)(ii). Emissions limited to lesser of lb/hr or grain loading.			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: TRS	2. Total Percent Efficiency of Control:
3. Potential Emissions: 2.63 lb/hour 11.5 tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 to tons/year	
6. Emission Factor: 8 ppmvd @ 10% O₂ Reference: 40 CFR 60.283(a)(5)	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): <p>Flow rate = 40,105 dscfm @ 4% O₂. Corrected TRS @ 4% O₂ to 10% O₂: 8 ppm x [(21-4)/(21-10.0)] = 12.4 ppm. 40,105 ft³/min x 60 min/hr x 2,116.8 lb/ft³ x 12.4 ft³/10⁶ ft³ ÷ 1,545 ft-lb_f/lb-mol °R x 34 lbs (H₂S)/lb-mol (H₂S) ÷ 528 °R = 2.63 lbs (TRS as H₂S)/hr. 2.63 lb/hr X 8,736 hr/yr ÷ 2000 lb/ton = 11.5 TPY.</p>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): <p>Emission Factor corrected to 10% O₂. NCGs are vented to the No. 4 Lime Kiln under normal operation and to the No. 5 Power Boiler when the kiln is offline.</p>	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 8 ppmvd @ 10% O₂	4. Equivalent Allowable Emissions: 2.63 lb/hour 11.5 tons/year
5. Method of Compliance (limit to 60 characters): <p>Annual source test using EPA Method 16 or 16A.</p>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <p>40 CFR 60.283(a)(5)</p>	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Annual test using EPA Method 9.	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(b)1.	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 1

1. Parameter Code: EM	2. Pollutant(s): TRS
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information: Manufacturer: STI, Inc. Model Number: Serial Number:	
5. Installation Date: Sept 1999	6. Performance Specification Test Date: Nov 1999
7. Continuous Monitor Comment (limit to 200 characters): 40 CFR 60.284(a)(2) and 62-296.404(5) and (6). SO₂ Analyzer – TECO A3C. O₂ Cell – 2FO Flue Gas.	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU8-J1</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU8-J2</u> [] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU8-J3</u> [] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU8-J4</u> [] Not Applicable [] Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU8-J6</u> [] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ [<input checked="" type="checkbox"/> Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ [<input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ [<input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation [<input checked="" type="checkbox"/>] Attached, Document ID: <u>JSF-EU8-J11</u> [<input type="checkbox"/>] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [<input type="checkbox"/>] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable
13. Identification of Additional Applicable Requirements [<input checked="" type="checkbox"/>] Attached, Document ID: <u>JSF-EU1-J13</u> [<input type="checkbox"/>] Not Applicable
14. Compliance Assurance Monitoring Plan [<input type="checkbox"/>] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [<input type="checkbox"/>] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [<input type="checkbox"/>] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [<input type="checkbox"/>] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [<input type="checkbox"/>] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [<input type="checkbox"/>] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [<input type="checkbox"/>] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable

ATTACHMENT JSF-EU8-B6
OPERATING CAPACITY COMMENT

ATTACHMENT JSF-EU8-B6**OPERATING CAPACITY COMMENT****MAXIMUM PROCESS/THROUGHPUT RATE**

No. 4 Lime Kiln:

46.87 tons (lime mud-CaCO₃)/hr or 93,749 lbs (lime mud-CaCO₃)/hr

Hours of Operation: 8,736 hrs/yr

No. 1 Lime Bin:

52,500 lbs (reburned lime)/hr

Hours of Operation: 8,760 hrs/yr

No. 2 Lime Bin:

88,500 lbs (purchased lime)/hr

Hours of Operation: 8,760 hrs/yr

MAXIMUM PRODUCTION RATE

No. 4 Lime Kiln:

26.25 tons (reburned lime-CaO)/hr or 630 tons (reburned lime-CaO)/day

ATTACHMENT JSF-EU8-E10

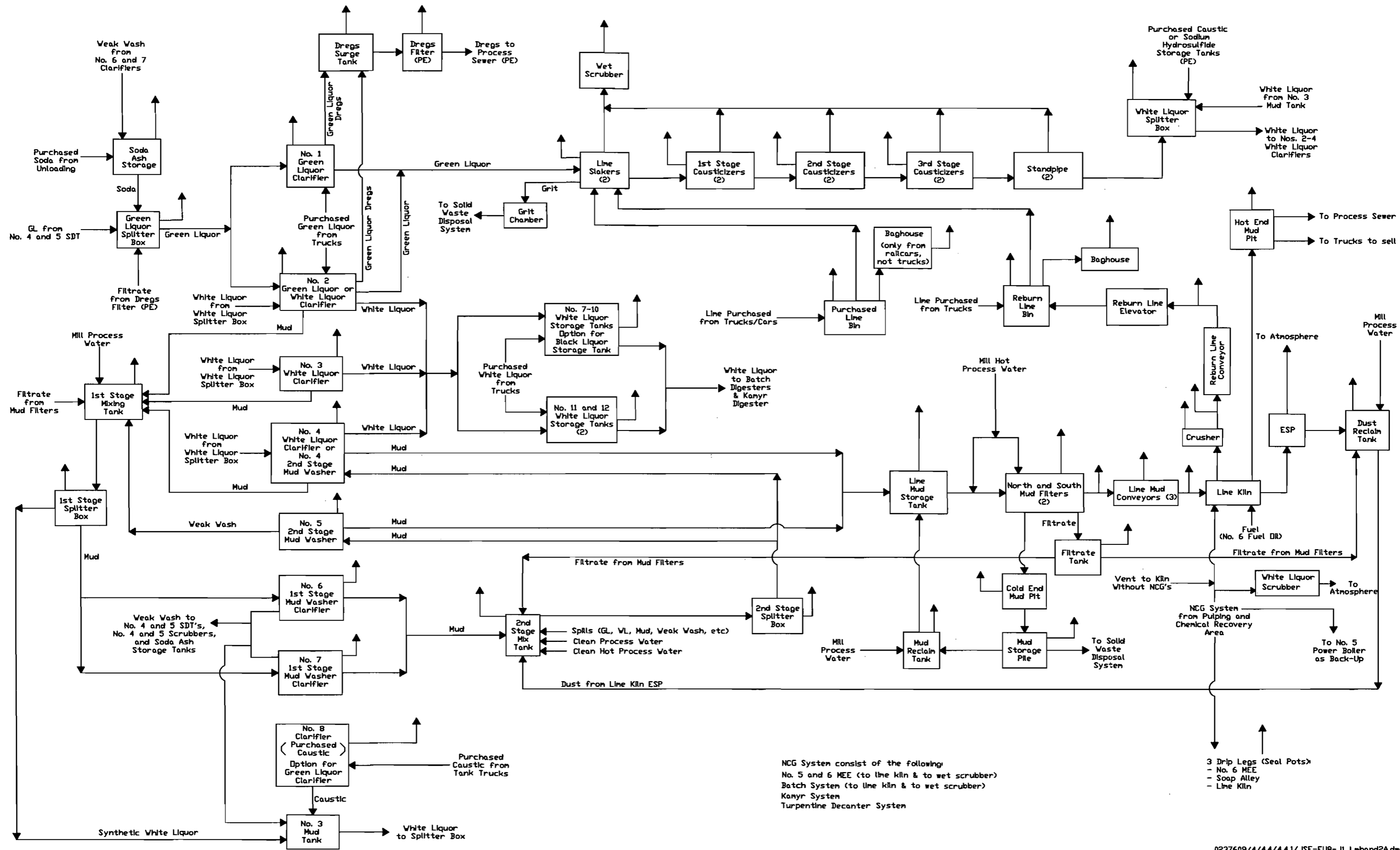
SEGMENT COMMENT

ATTACHMENT JSF-EU8-E10**SEGMENT COMMENT****COMMENT: SEGMENT NO. 1**

Maximum Hourly Rate is the sum of the maximum hourly rates of 85 tons (ADUP)/hr from the Kamyr Digester System and 101 tons (ADUP)/hr from the Batch Digester System.

Maximum Annual Rate is the sum of the maximum hourly rates of 85 tons (ADUP)/hr for 8,736 hr/yr from the Kamyr Digester System and 101 tons (ADUP)/hr for 8,760 hr/yr from the Batch Digester System.

ATTACHMENT JSF-EU8-J1
PROCESS FLOW DIAGRAM



Process Flow Legend
 Solid/Liquid →
 Gas →

Jefferson Smurfit Corporation (U.S.)
 Fernandina Beach, FL JSF-EU8-J1
 Process Flow Diagram with MACT I

Emission Unit: No. 4 Lime Kiln
 Process Area: Chemical Recovery
 Filename: lmhand2A.dwg
 Revision Date: December 9, 2002



ATTACHMENT JSF-EU8-J2
FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT JSF-EU8-J2**NO. 4 LIME KILN****FUEL ANALYSIS**

Fuel	Density (lb/gal)	Moisture (%)	Weight % Sulfur	Weight % Nitrogen	Weight % Ash	Heat Capacity
No. 6 Fuel Oil ^a	8.33	--	3.0	0.5	0.1	145,000 - 150,000 Btu/gal
Liquified Petroleum Gas	4.2	--	--	--	--	92,500 Btu/gal

^a Fuel oil may contain on-spec used oil.

ATTACHMENT JSF-EU8-J3
DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT JSF-EU8-J3

CONTROL EQUIPMENT PARAMETERS

NO. 4 LIME KILN ELECTROSTATIC PRECIPITATOR

Manufacturer	<u>Research Cottrell</u>		
Model No.	<u>RCN-117</u>		
Date of Installation	<u>1988</u>		
Inlet Gas Temperature	<u>350 °F</u>		
Inlet Gas Flow Rate	<u>70,500 acfm</u>		
Primary Voltage	<u>300-400 V</u>		
Secondary Voltage	<u>50-60 kV</u>		
Primary Current	<u>30-100 Amps</u>		
Secondary Current	<u>150-500 mAmps</u>		
Spark Rate	<u>4 per minute</u>		
Pressure Drop-Actual	<u>3 Inches of H₂O</u>		
Pressure Drop-Design	<u>15 Inches of H₂O</u>		
Maximum Permitted Particulate Matter Emissions *	<u>43.5 lb (PM)/hr</u>		
<u>Pollutants</u>	<u>Inlet Loading</u>	<u>Outlet Loading</u>	<u>Control Efficiency</u>
Particulate Matter (PM)	26 gr/dscf	0.13 gr/dscf	99.5%

* Values obtained from Permit No. 0870003-001-AV.

ATTACHMENT JSF-EU8-J3

CONTROL EQUIPMENT PARAMETERS

NOS. 1 AND 2 LIME BIN BAGHOUSE

	No. 1 Lime Bin Baghouse (Reburned Lime)	No. 2 Lime Bin Baghouse (Purchased Lime)
Manufacturer	Jet Air Baghouse	Mikro Pul, Pulsaire
Model No.	JA-49-B	55S-8-220-TR
Date of Installation	March 2002	February 1989
Outlet Gas Temperature (°F)	110 - 400	110 - 275
Outlet Gas Flow Rate (acfm)	1,650	3,000
Cleaning Method	Air Pressure Pulse Jet	Air Pressure Pulse Jet
Number of Bags	49	55
Filter Media Composition	Nomex	Polyester
Total Area of Filter Media (ft ²)	524	518.1
Pressure Drop Across Device (inches H ₂ O)	3-6 inch water column	220
Air to Cloth Ratio	3.1:1	6 : 1

ATTACHMENT JSF-EU8-J4
DESCRIPTION OF STACK SAMPLING FACILITIES

ATTACHMENT JSF-EU8-J4**DESCRIPTION OF STACK SAMPLING FACILITIES****NO. 4 LIME KILN**

The following is a description of the No. 4 Lime Kiln stack sampling facilities [as required per Rule 62-297.310(6)].

Sampling ports

1. All sampling ports have an inside diameter of approximately 5 inches.
2. The ports are capable of being sealed when not in use.
3. The sampling ports are located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. A complete application to construct was filed after December 1, 1980; therefore, two sampling ports, each 90 degrees apart, were installed since the stack has an outside diameter greater than 10 feet.

Work platforms

1. The working platform is approximately 40 square feet in area and approximately 3 feet wide.
2. This circular stack has two sampling ports; therefore, the work platform extends 160 degrees around the stack.
3. The platform is equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor opening cover if ladder access is used to reach the platform.
4. The safety rail directly in line with the sampling ports is removable so that no obstruction exists in an area 14 inches below each sample port (CCA has an obstruction 11 inches below each sample port) and 6 inches on either side of the sampling port.

Means of access

1. Ladders to the work platform are greater than 15 feet in length and have safety cages.
2. Walkways over free fall areas are equipped with safety rails and toeboards.

Equipment support structures

1. A complete monorail arrangement is substituted for the eyebolt and angle bracket.

ATTACHMENT JSF-EU8-J6

PROCEDURES FOR STARTUP AND SHUTDOWN

ATTACHMENT JSF-EU8-J6**PROCEDURES FOR STARTUP AND SHUTDOWN**

Lime Kiln with electrostatic precipitator (ESP).

Startup

Startup requires approximately 36 hours. Excess emissions of PM, TRS, and VE may occur over a period of up to 12 hours. In order to minimize the duration and magnitude of excess emissions during startup, the following procedures are undertaken. Propane is used initially for startup, prior to fuel oil injection. One field of the ESP is energized prior to full firing of No. 6 fuel oil. Turn on remaining ESP fields prior to feeding any lime mud and increasing No. 6 fuel oil flow to full capacity. Non-condensable gases (NCGs) are not vented to the lime kiln until kiln is fully operational and stable. Prior to this, NCGs are vented to the backup scrubber. This minimizes emissions during startup.

Shutdown

Shutdown requires approximately 36 hours. Excess emissions of PM, TRS, and VE may occur over a period of up to 12 hours. In order to minimize the duration and magnitude of excess emissions during shutdown, the following procedures are undertaken. NCGs are vented to the backup scrubber. No. 6 fuel oil feed is turned off. The lime mud feed is turned off and routed to either storage or the clarifiers. Then the elevator, returned conveyor, crusher, hot end pit is closed down along with the main kiln drive. All ESP fields remain energized during entire shutdown time. This minimizes emissions during shutdown.

ATTACHMENT JSF-EU8-J11
ALTERNATIVE METHODS OF OPERATION

ATTACHMENT JSF-EU8-J11
ALTERNATIVE METHODS OF OPERATION

Lime Kiln

Dust from the lime kiln is passed through an electrostatic precipitator (ESP). The captured dust is either:
 1) slurried with filtrate or water and pumped back to the mud washers; or 2) conveyed back to the kiln.

Alternative Method	Fuel Options	Maximum Heat Input Rate (MMBtu/hr)	Maximum Operating Rate (gal/hr)
1	No. 6 fuel oil only. ^a	170.63 ^b	1,176.8
2	Liquified Petroleum Gas	7.9	85
3	Any combination of alternative methods listed above with or without NCGs being burned.	Individual rates listed above	Individual rates listed above

^a No. 6 fuel oil may include on-spec used oil.

^b Heat input rate is based on 145,000 Btu/gal and maximum operating rate. This value may change based on the heat capacity of the No. 6 fuel oil used.

EMISSION UNIT 9
C-LINE BSW SYSTEM

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p style="text-align: center;">C-Line Brownstock Washer System</p>			
<p>4. Emissions Unit Identification Number: <input type="checkbox"/> No ID</p> <p>ID: 024 <input type="checkbox"/> ID Unknown</p>			
<p>5. Emissions Unit Status Code:</p> <p>A</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code:</p> <p>26</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p>C-Line BSW system consists of the C-Line 1st and 2nd Stage Filtrate Tanks, 2nd Stage Pressure Diffusion Washer, and C-Line 1st stage Vacuum Washer. Gases from these sources are vented to the C-Line turpentine extraction tower then to the C-Line wet scrubber.</p>			

Emissions Unit Control Equipment

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p> <p>Packed Gas Adsorption Column</p>
<p>2. Control Device or Method Code(s): 050</p>

Emissions Unit Details

<p>1. Package Unit:</p> <p>Manufacturer: Model Number:</p>
<p>2. Generator Nameplate Rating: MW</p>
<p>3. Incinerator Information:</p> <p style="text-align: right;">Dwell Temperature: °F</p> <p style="text-align: right;">Dwell Time: seconds</p> <p style="text-align: right;">Incinerator Afterburner Temperature: °F</p>

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr tons/day
3. Maximum Process or Throughput Rate:	See Comment
4. Maximum Production Rate:	51,000 lb/hr dry pulp
5. Requested Maximum Operating Schedule:	
24 hours/day	7 days/week
52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	
<p>51,000 lb/hr bone dry pulp and 76,739 lb/hr BLS. Maximum Production Rate is 24-hr average. Maximum Production Rate may also be represented as 54,570 lb/hr air dried pulp at 9.3% moisture.</p>	

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)****List of Applicable Regulations**

40 CFR 60.7
40 CFR 60.8
40 CFR 60.11(a)
40 CFR 60.11(d)
40 CFR 60.11(f)
40 CFR 60.12
40 CFR 60.13(a)
40 CFR 60.13(b)
40 CFR 60.13(c)(2)
40 CFR 60.13(d)(1)
40 CFR 60.13(e)(2)
40 CFR 60.13(f)
40 CFR 60.13(i)
40 CFR 60.13(j)
40 CFR 60.19
40 CFR 60.282(a)(1)(v)
40 CFR 60.284(a)(2)
40 CFR 60.284(c)
40 CFR 60.284(d)(3)(i)
40 CFR 60.284(e)(2)
40 CFR 60.285(a)
40 CFR 60.285(d)
40 CFR 60.285(f)(2)
62-296.800(7)(b)35.
62-297.401(1)(a)
62-297.401(2)
62-297.401(3)
62-297.401(4)
62-297.401(16)
62-297.401(16)(a)

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 024	2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):		
12. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: V	6. Stack Height: 70 feet	7. Exit Diameter: 2 feet
8. Exit Temperature: 102 °F	9. Actual Volumetric Flow Rate: 4,300 acfm	10. Water Vapor: 7 %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):		
14. Emission Point Comment (limit to 200 characters): The C-Line BSW System is vented to the C-Line Turpentine Extraction Tower then to the C-Line Wet Scrubber. Stack parameters updated from stack test data.		

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products: Sulfate (Kraft) Pulping, Stock Washing/Screening		
2. Source Classification Code (SCC): 3-07-001-20		3. SCC Units: Tons of ADUP produced
4. Maximum Hourly Rate: 27.285	5. Maximum Annual Rate: 239,017	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum hourly rate based on 51,000 lb/hr bone dry pulp; 54,570 lb/hr ADUP at 9.3% moisture.		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: TRS		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.16 lb/hour		4. Synthetically Limited? [] 0.7 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 5 ppmvd Reference: 40 CFR 60.283(a)(1)(v)		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): $5 \text{ ppmvd} \times 6775 \text{ acf(dry)/min} \times 60 \text{ min/hr} \div (34/1545) \text{ lb}_m\text{-}^\circ\text{R/ft-lb}_f \times 2116.8 \text{ lb}_f\text{/ft}^2 \div 580 \text{ }^\circ\text{R} = 0.16 \text{ lb/hr}$			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emission Factor corrected to actual oxygen content of untreated flue gas. Volumetric flow rate of 7,130 acfm at 120 °F and 5% H₂O was corrected to 6,775 acfm at 120 °F and dry conditions.			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 5 ppmvd		4. Equivalent Allowable Emissions: 0.16 lb/hour 0.7 tons/year	
5. Method of Compliance (limit to 60 characters): Stack testing by Method 16 or 16A every 5 years.			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Requested Allowable Emissions and Units: At actual O₂ content of untreated flue gas. 40 CFR 60.283(a)(1)(v).			

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 2

1. Parameter Code: FLOW	2. Pollutant(s): TRS
3. CMS Requirement:	[<input checked="" type="checkbox"/>] Rule [] Other
4. Monitor Information: Manufacturer: Honeywell Flow Transmitter Model Number: KIW11 Serial Number: 06-FI-301-61	
5. Installation Date: 09 Jun 1995	6. Performance Specification Test Date: 30 Apr 1996
7. Continuous Monitor Comment (limit to 200 characters): 40 CFR 60.284(a)(2). Scrubber liquid flow is monitored as a surrogate parameter for TRS.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 2 of 2

1. Parameter Code: PRS	2. Pollutant(s): TRS
3. CMS Requirement: [<input checked="" type="checkbox"/>] Rule [] Other	
4. Monitor Information: Manufacturer: Honeywell Diff. Pressure Transmitter Model Number: STD 120 Serial Number: 06-PC312-61	
5. Installation Date: 09 Jun 1995	6. Performance Specification Test Date: 30 Apr 1996
7. Continuous Monitor Comment (limit to 200 characters): Pressure drop is monitored across scrubber tower as a surrogate parameter for TRS.	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

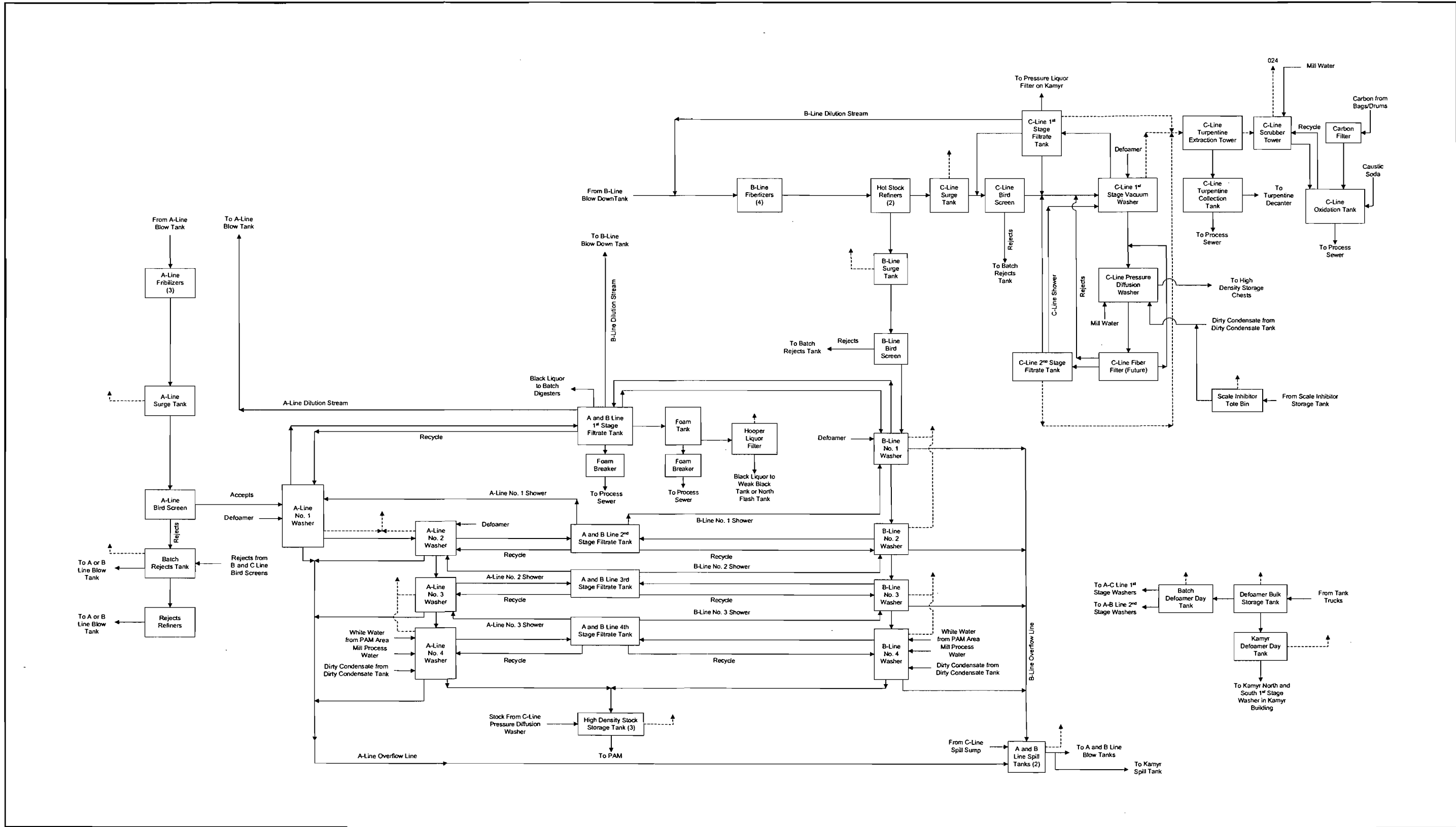
Supplemental Requirements

1. Process Flow Diagram [<input checked="" type="checkbox"/>] Attached, Document ID: <u>JSF-EU9-J1</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [<input checked="" type="checkbox"/>] Attached, Document ID: <u>JSF-EU9-J3</u> [] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [] Waiver Requested
5. Compliance Test Report [] Attached, Document ID: _____ [] Previously submitted, Date: _____ [<input checked="" type="checkbox"/>] Not Applicable
6. Procedures for Startup and Shutdown [] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input checked="" type="checkbox"/> Attached, Document ID: <u>JSF-EU9-J13</u> <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT JSF-EU9-J1
PROCESS FLOW DIAGRAM



Attachment JSF-EU9-J1
 Process Flow Diagram: Brown Stock Washing
 Jefferson Smurfit Corp.
 Fernandina Beach, FL

Process Flow Legend
 Solid/Liquid ———→
 Gas - - - - ->

Filename: 0237609/4/4.4/4.1/JSF-EU9-J1.vsd
 Date: 12/13/2002



ATTACHMENT JSF-EU9-J3
DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT JSF-EU9-J3

**CONTROL EQUIPMENT PARAMETERS
C-LINE BSW PACKED GAS ADSORPTION COLUMN**

Manufacturer and Model No.	<u>Tristate Contractors</u>		
Date of Installation	<u>June 9, 1995</u>		
Inlet Gas Temperature	<u>100</u>		°F
Inlet Gas Flow Rate	<u>7,200</u>		acfm
Outlet Gas Temperature	<u>102</u>		°F
Outlet Gas Flow Rate	<u>7,200</u>		acfm
Pressure Drop Across Device	<u>0.03</u>		inches of H ₂ O
Scrubbing Media	<u>Sodium Hypochlorite Solution</u>		
Scrubbing Media Flow Rate	<u>326</u>		gpm
Scrubbing Media Supply Pressure – Normal	<u>32</u>		psig
Average Scrubbing Media pH	<u>10</u>		pH units
Maximum Permitted Total Reduced Sulfur Emissions*	<u>5</u>		ppmvd
<u>Pollutants</u>	<u>Inlet Loading</u>	<u>Outlet Loading</u>	<u>Control Efficiency</u>
Total Reduced Sulfur	50 ppmvd	5 ppmvd	90 %

*Value obtained from Permit No. 0890003-001-AV.

ATTACHMENT JSF-EU9-J13

IDENTIFICATION OF ADDITIONAL APPLICABLE REQUIREMENTS

Florida Department of Environmental Protection



Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

CERTIFIED - RETURN RECEIPT

May 3, 1994

Mr. Warren S. Flenniken
General Manager
Fernandina Mill
Container Corporation of America
Post Office Box 2000
Fernandina Beach, Florida 32034

Dear Mr. Flenniken:

Nassau County - AP
Container Corporation of America
Emission Unit / Permit No. / ID No.
C-Line BSWS / AC45-190383 / 31JAX45000324

This permit is extended to 06-02-95 to coordinate this emissions unit with the submittal of the Title V source (facility) permit application which shall be submitted by 04-02-95 per FAC Rule 17-213.420(1)(a)1.a.

Since this extension is in lieu of processing an operation permit application for a short-term operation permit, the testing required by this permit shall be performed initially and annually thereafter.

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

If there are any questions, please contact Johnny Cole at (904) 448-4310, Ext. 236.

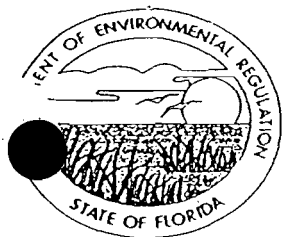
Sincerely,

A handwritten signature in cursive script, appearing to read "Ernest E. Frey".

Ernest E. Frey, P.E.

Director of District Management

EEF:RJL:JLC



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

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

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

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

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

The Standard Classification Codes are:

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

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

Attachments are listed below:

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

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Attachments Continued:

- b. Ms. Jewell A. Harper's letter of April 4, 1990.
6. Mr. Wayne S. Barlow's letter with an attachment (waiver of the 90-day clock) received October 18, 1990.
7. Mr. Wayne S. Barlow's letter received October 19, 1990.
8. Mr. Mort Benjamin's Interoffice Memorandum received October 25, 1990.
9. Mr. R. L. Caleen's letter with enclosure (waiver of the 90-day clock) received October 31, 1990.
10. "Air Quality Impact Analysis" prepared by KBN Engineering and Sciences, Inc., and received November 5, 1990.
11. Mr. Wayne S. Barlow's letter received November 7, 1990.
12. Data sheet received November 8, 1990 (hand delivered).
13. Notice of Permit Denials signed November 13, 1990.
14. Mr. Wayne S. Barlow's letter with attachment dated December 3, 1990.
15. "Net Emissions Increase Analysis" prepared by KBN Engineering and Applied Sciences, Inc., and received on December 6, 1990 (no P.E. seal affixed to the document).
16. EPA documents (3) related to "debottlenecking and PSD" received via FAX from Mr. Greg Worley on December 6, 1990.
17. "Analysis of CCA Contributions to Predicted SO₂ Exceedances" received December 10, 1990 (no P.E. seal affixed to the document).
18. Mr. Roger Hagan's Interoffice Correspondence (Fuel Oil Consumption by the No. 4 Power Boiler) received December 12, 1990.
19. Mr. Terry Cole's letter with an enclosure (P.E. sealed document referred to in #14 above) received December 17, 1990.
20. DARM/BAMA modeling output synopsis pages (2).
21. Mr. C. H. Fancy's letter with attachments dated December 18, 1990.
22. Technical Evaluation and Preliminary Determination dated December 19, 1990.
23. F.A.C. Chapter 17-2 (October, 1989).
24. F.A.C. Chapter 17-4 (October 17, 1990)
25. 40 CFR (July 1, 1989 version).
26. Mr. Wayne Barlow's letter dated January 4, 1991, and received January 4, 1991, at a meeting held at the BAR.
27. Mr. Terry Cole's letter dated January 8, 1991, and received January 9, 1991.
28. Mr. Terry Cole's letter dated January 9, 1991, and received January 9, 1991.
29. Mr. Steven R. Marks's letter with enclosure dated January 9, 1991, and received January 10, 1991.

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Container Corporation of
America

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PSD-FL-165
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

Attachments Continued:

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

GENERAL CONDITIONS:

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

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

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America

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GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Container Corporation of
America

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Expiration Date: June 30, 1992

GENERAL CONDITIONS:

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

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

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

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

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

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

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

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Container Corporation of
America

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Expiration Date: June 30, 1992

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes Compliance with New Source Performance Standards (NSPS).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

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SPECIFIC CONDITIONS:

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

PERMITTEE:
Container Corporation of
America

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Expiration Date: June 30, 1992

SPECIFIC CONDITIONS:

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

- a. The No. 5 Power Boiler's stack height shall be raised or other appropriate measures taken to reduce SO₂ emissions from the No. 5 Power Boiler and/or other sources at the facility so as to correct the modeled ambient SO₂ violation due to the emissions from the facility. A demonstration in accordance with EPA and state rules shall be utilized to determine the appropriate stack height;
- b. A construction permit for the No. 5 Power Boiler shall be acquired by submitting an application and the appropriate processing fee to the Department's Bureau of Air Regulation in order to establish a federally enforceable permit and conditions;
- c. For the facility, the No. 6 Fuel Oil sulfur content shall not exceed 2.5%, by weight; and,
- d. The No. 6 Fuel Oil input rate for the No. 5 Power Boiler shall be limited to a maximum of 92,400 gallons per 24-hour period (midnight to midnight).

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

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

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

Issued this 20 day
of February, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Carol M. Browner, Secretary

EMISSION UNIT 10

WOODYARD

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Woodyard			
4. Emissions Unit Identification Number: ID: 025		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code: A	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 26	8. Acid Rain Unit? <input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters) Consists of log storage, bark storage, debarking, chipping, chip storage, chip cyclone, chip thickness screening building with screens, associated conveyor systems, batch chip bins, hydraulic truck dumpers, and chip railcar shaker.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit:	
Manufacturer:	Model Number:
2. Generator Nameplate Rating:	MW
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code:	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
13. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products, Miscellaneous Wood/Bark Operations, Stockpiles		
2. Source Classification Code (SCC): 3-07-040-02		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 854	5. Maximum Annual Rate: 7,481,040	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum rates based on producing up to 6,000 cords(chips)/day and supplementing up to 8,200 cords(purchased chips)/day and a conversion factor of 5,000 lbs/cord of chips.		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products, Miscellaneous Wood/Bark Operations, Conveyors		
2. Source Classification Code (SCC): 3-07-040-05		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 854	5. Maximum Annual Rate: 7,481,040	6. Estimated Annual Activity Factor:
9. Maximum % Sulfur:	10. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Segment pertains to conveying of chips and bark. Maximum rates based on producing up to 6,000 cords(chips)/day and supplementing up to 8,200 cords(purchased chips)/day and conversion factor of 5,000 lb/cord of chips.		

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted:		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		4. Synthetically Limited? [] tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
5. Compliance Test Report [] Attached, Document ID: _____ [] Previously submitted, Date: _____ [X] Not Applicable
6. Procedures for Startup and Shutdown [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [] Attached, Document ID: _____ [X] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

<p>11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>15. Acid Rain Part Application (Hard-copy Required)</p> <p><input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____</p> <p><input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____</p> <p><input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____</p> <p><input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____</p> <p><input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____</p> <p><input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____</p> <p><input checked="" type="checkbox"/> Not Applicable</p>

EMISSION UNIT 11
BROWNSTOCK WASHING

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p style="text-align: center;">Brownstock Washing</p>			
<p>4. Emissions Unit Identification Number: <input type="checkbox"/> No ID</p> <p>ID: 026 <input type="checkbox"/> ID Unknown</p>			
<p>5. Emissions Unit Status Code:</p> <p>A</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code:</p> <p>26</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p style="text-align: center;">See Attachment JSF-EU11-A9.</p>			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit:	
Manufacturer:	Model Number:
2. Generator Nameplate Rating:	MW
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code:	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
14. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products, Sulfate (Kraft) Pulping, Stock Washing/Screening		
2. Source Classification Code (SCC): 3-07-001-20		3. SCC Units: Tons Air-Dried Unbleached Pulp Produced
4. Maximum Hourly Rate: 186	5. Maximum Annual Rate: 1,171,650	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum annual rate is based on 3,210 tons/day ADUP from digesters and 365 days/year.		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
11. Maximum % Sulfur:	12. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted:		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: _____ Model Number: _____ Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT JSF-EU11-A9

EMISSIONS UNIT COMMENT

ATTACHMENT JSF-EU11-A9

EMISSIONS UNIT COMMENT

BROWNSTOCK WASHING

Batch Digester Washlines and associated filtrate tanks
Kamyr Digester Washlines and associated filtrate tanks
Foam Tanks
Hydraulic systems
Chemical Additive Tanks
Surge Tanks
Liquor Filters
Defoamer Tanks
Digester Uncapping

EMISSION UNIT 12
CHEMICAL RECOVERY AREA

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Chemical Recovery Area			
4. Emissions Unit Identification Number: <input type="checkbox"/> No ID			
ID: 028 <input type="checkbox"/> ID Unknown			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit? <input type="checkbox"/>
A		26	
9. Emissions Unit Comment: (Limit to 500 Characters)			
See Attachment JSF-EU12-A9.			

Emissions Unit Control Equipment

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p>
<p>2. Control Device or Method Code(s):</p>

Emissions Unit Details

<p>1. Package Unit: Manufacturer:</p>	<p>Model Number:</p>
<p>2. Generator Nameplate Rating:</p>	<p>MW</p>
<p>3. Incinerator Information:</p>	
<p style="text-align: right;">Dwell Temperature:</p>	<p style="text-align: right;">°F</p>
<p style="text-align: right;">Dwell Time:</p>	<p style="text-align: right;">seconds</p>
<p style="text-align: right;">Incinerator Afterburner Temperature:</p>	<p style="text-align: right;">°F</p>

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code:	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
15. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products, Sulfate (Kraft) Pulping, Other Not Classified		
2. Source Classification Code (SCC): 3-07-001-99		3. SCC Units: Tons Air-Dried Unbleached Pulp Produced
4. Maximum Hourly Rate: 186	5. Maximum Annual Rate: 1,171,650	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum annual rate is based on 3,210 tons (ADUP)/day from digesters and 365 days/year.		

Segment Description and Rate: Segment ____ of ____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
13. Maximum % Sulfur:	14. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC			NS
HAPS			NS
H001			NS
H115			NS
H120			NS

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted:	2. Total Percent Efficiency of Control:
3. Potential Emissions: <div style="text-align: right; margin-right: 100px;">lb/hour</div>	4. Synthetically Limited? [] <div style="text-align: right; margin-right: 100px;">tons/year</div>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters):	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: <div style="text-align: right; margin-right: 100px;">lb/hour</div> tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: _____ Model Number: _____ Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)****Supplemental Requirements**

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT JSF-EU12-A9
EMISSIONS UNIT COMMENT

ATTACHMENT JSF-EU12-A9**EMISSIONS UNIT COMMENT****CHEMICAL RECOVERY AREA**

Lime Slaker and Lime Kiln Area

Lime and Lime Mud Storage Piles

Lime Handling System – Lime Mud Conveyor to Kiln (cold end)

Lime Kiln Trunnion Water Collection Tank

Lime Mud Filtrate Tank

Lime Mud Reclaim Tank

Lime Mud Tanks

Lime Mud Washers and associated tanks

Lime Slakers (North and South) with Wet Scrubbers

Causticizers (North and South) (vented to Lime Slaker Scrubber) and Standpipes

Grit Washers and associated tanks

White Liquor Clarifiers

White Liquor Tanks

Black Liquor Tanks

Soap Tanks

Weak Wash Tanks

Green Liquor Clarifiers and Tanks

Green Liquor Dregs Washer

Recovery Boiler Smelt Spout View Ports

Spill Tanks

Condensate Tanks

Chemical Additive Tanks

Salt Cake Storage Bins with Baghouses

Dust Reclaim Tanks

Soda Ash Storage

Tall Oil Plant

Tall Oil Storage Tanks

Soap Storage Tanks

Tall Oil Settling Tanks

Flash Tanks

EMISSION UNIT 13
COVERTING AREA/WAREHOUSE

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
[] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
[X] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
[] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
[] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
[X] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Converting Area/Warehouse			
4. Emissions Unit Identification Number: [] No ID ID: 029 [] ID Unknown			
5. Emissions Unit Status Code: A	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 26	8. Acid Rain Unit? []
9. Emissions Unit Comment: (Limit to 500 Characters)			
See Attachment JSF-EU13-A9.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):
2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit:	Manufacturer:	Model Number:
2. Generator Nameplate Rating:	MW	
3. Incinerator Information:	Dwell Temperature:	°F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code:	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
16. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates:			
Zone:		East (km):	North (km):
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products, Pulpboard Manufacture, Paperboard: General		
2. Source Classification Code (SCC): 3-07-004-01		3. SCC Units: Tons Finished Product
4. Maximum Hourly Rate:	5. Maximum Annual Rate: 1,423,500	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum rates vary based upon grade mix of paperboard produced. At the current grade mix, maximum capacity is 3,900 tons/day.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
15. Maximum % Sulfur:	16. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: _____ Model Number: _____ Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)****Supplemental Requirements**

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation [] Attached, Document ID: _____ [X] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [] Attached, Document ID: _____ [X] Not Applicable
14. Compliance Assurance Monitoring Plan [] Attached, Document ID: _____ [X] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [X] Not Applicable

ATTACHMENT JSF-EU13-A9
EMISSIONS UNIT COMMENT

ATTACHMENT JSF-EU13-A9**EMISSIONS UNIT COMMENT****CONVERTING AREA/WAREHOUSE**

Rewinders

Conveyors

Lowerators (Elevator)

Trim Handling

Printing

Box Plant:

Wet End/Dry End Corrugation Exhaust

Bailer Room Exhaust

Wax Storage Tank

Corrugation vacuum exhaust

Package Boiler (Propane)

Flexographic Printing

Warehousing Activities

Chemical Additive Tanks

Bulk Sodium Silicate Tanks

Portable Slime Control Chemical Tanks

Dispersant Chemical Storage Tanks

Spill Collection Chest

Defoamer Storage Tanks

Roll Handling Bldg. Roof Exhaust Fan

Chemical Usage

Size Tanks

Deculator Rejects Tanks

Kerosene Tank

Kerosene Usage

EMISSION UNIT 14

FACILITY WIDE MISCELLANEOUS

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p style="text-align: center;">Facility Wide Miscellaneous</p>			
<p>4. Emissions Unit Identification Number: <input type="checkbox"/> No ID</p> <p style="text-align: left;">ID: 030 <input type="checkbox"/> ID Unknown</p>			
<p>5. Emissions Unit Status Code:</p> <p style="text-align: center;">A</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code:</p> <p style="text-align: center;">26</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p style="text-align: center;">See Attachment JSF-EU14-A9.</p>			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit:	
Manufacturer:	Model Number:
2. Generator Nameplate Rating: MW	
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code:	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
17. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: <div style="text-align: right;">feet</div>	7. Exit Diameter: <div style="text-align: right;">feet</div>	
8. Exit Temperature: <div style="text-align: right;">°F</div>	9. Actual Volumetric Flow Rate: <div style="text-align: right;">acfm</div>	10. Water Vapor: <div style="text-align: right;">%</div>	
11. Maximum Dry Standard Flow Rate: <div style="text-align: right;">dscfm</div>		12. Nonstack Emission Point Height: <div style="text-align: right;">feet</div>	
13. Emission Point UTM Coordinates:			
Zone:	East (km):	North (km):	
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper & Wood Products, Pulpboard Manufacture, Paperboard: General		
2. Source Classification Code (SCC): 3-07-001-01		3. SCC Units: Tons Finished Product
4. Maximum Hourly Rate:	5. Maximum Annual Rate: 1,423,500	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum rates are variable depending on grade mix of paperboard produced. At the current grade mix, maximum capacity is 3,900 tons/day.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
17. Maximum % Sulfur:	18. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: _____ Model Number: _____ Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation

 Attached, Document ID: _____ Not Applicable

12. Alternative Modes of Operation (Emissions Trading)

 Attached, Document ID: _____ Not Applicable

13. Identification of Additional Applicable Requirements

 Attached, Document ID: _____ Not Applicable

14. Compliance Assurance Monitoring Plan

 Attached, Document ID: _____ Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

 Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID: _____ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID: _____ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID: _____ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID: _____ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID: _____ Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID: _____ Not Applicable

ATTACHMENT JSF-EU14-A9
EMISSIONS UNIT COMMENT

ATTACHMENT JSF-EU14-A9**EMISSIONS UNIT COMMENT****FACILITY WIDE MISCELLANEOUS**

Parts Washers

Vehicular Traffic on Paved and Unpaved Roads

Wastewater/Solid Waste Treatment Plant

Unox Basement Exhaust

Blend Pond

Lime Dregs Handling

Defoamer Storage Tanks

Grit Chamber

Polymer Storage Tanks

Chemical Usage

Dewatered Sludge Pile

Presses

Sludge Dewatering

Powerhouse Area General

Anti-scalant Tanks

Cleaning Mix Tank

Boilerwater Treatment Chemical Tanks

Turbine Hydraulic Oil System Tanks

D.I. Digasifier Tank

Bark Mini Bin

Coal Bunkers

Bottom Ash Storage Pile

Fly Ash Handling Vacuum Conveyor Pump

Coal Silos

Coal Conveyors

Fly Ash Storage Pile

H₂SO₄ Storage Tank

No. 6 Fuel Oil Storage Tanks

Diesel Fuel Storage Tanks (No. 2 Fuel Oil)

Gasoline Storage Tanks

Propane Storage Tanks

Maintenance Activities

 Sandblast Bldg. Exhaust

 Portable Sandblast Unit

Waste Oil Bowser

Chemical Additive Tanks

Drains

Lube Oil Tanks

Laboratory Hoods and Vents

Cooling Towers

EMISSION UNIT 15
SECONDARY FIBER PULPING

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p style="text-align: center;">Secondary Fiber Pulping</p>			
<p>4. Emissions Unit Identification Number: <input type="checkbox"/> No ID</p> <p style="text-align: left;">ID: 031 <input type="checkbox"/> ID Unknown</p>			
<p>5. Emissions Unit Status Code:</p> <p>A</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code:</p> <p>26</p>	<p>8. Acid Rain Unit?</p> <p><input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p style="text-align: center;">This emission unit is for the Recycle Fiber Plant. Consists of pulper hood exhaust, decker hood exhaust, HD stock chest, and chemical usage.</p>			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit:		
Manufacturer:		Model Number:
2. Generator Nameplate Rating:		MW
3. Incinerator Information:		
	Dwell Temperature:	°F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code:	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
18. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper & Wood Products; Miscellaneous Paper Products - Other Not Classified		
2. Source Classification Code (SCC): 3-07-013-99		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate: 20.83	5. Maximum Annual Rate: 182,500	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum rates based on 500 oven-dried tons unbleached pulp per day (ODTUP/day) recycle material production.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
19. Maximum % Sulfur:	20. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted:		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation [] Attached, Document ID: _____ [X] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [] Attached, Document ID: _____ [X] Not Applicable
14. Compliance Assurance Monitoring Plan [] Attached, Document ID: _____ [X] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [X] Not Applicable

EMISSION UNIT 16

PAPERMAKING

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p>Papermaking</p>			
<p>4. Emissions Unit Identification Number: ID: 032</p>		<p><input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>	
<p>5. Emissions Unit Status Code: A</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code: 26</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p>Consists of Nos. 2, 3, and 4 Paper Machines, HD Tanks, and chemical usage.</p>			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):
2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit:		
Manufacturer:	Model Number:	
2. Generator Nameplate Rating:	MW	
3. Incinerator Information:		
Dwell Temperature:		°F
Dwell Time:		seconds
Incinerator Afterburner Temperature:		°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code:	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
19. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates:			
Zone:	East (km):	North (km):	
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products; Pulpboard Manufacture – Paperboard: General.		
2. Source Classification Code (SCC): 3-07-004-01		3. SCC Units: Tons Finished Product
4. Maximum Hourly Rate: 162.5	5. Maximum Annual Rate: 1,423,500	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum rates are variable depending on grade mix of paperboard produced. At the current grade mix, maximum capacity is 3,900 TPD.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
21. Maximum % Sulfur:	22. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC			NS
HAPS			NS
H001			NS
H095			NS
H115			NS
H120			NS
H174			NS

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted:		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: _____ Model Number: _____ Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
5. Compliance Test Report [] Attached, Document ID: _____ [] Previously submitted, Date: _____ [X] Not Applicable
6. Procedures for Startup and Shutdown [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [] Attached, Document ID: _____ [X] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation [] Attached, Document ID: _____ [X] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [] Attached, Document ID: _____ [X] Not Applicable
14. Compliance Assurance Monitoring Plan [] Attached, Document ID: _____ [X] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSION UNIT 17
PULPING SYSTEM-MACT 1

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION (All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
[] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
[X] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
[] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
[] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Pulping System – MACT I			
4. Emissions Unit Identification Number:		[] No ID	
ID: 033		[] ID Unknown	
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		26	[]
9. Emissions Unit Comment: (Limit to 500 Characters)			
See Attachment JSF-EU17-A9.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Combustion in No. 4 Lime Kiln or No. 5 Power Boiler.

Pulping system condensates are treated with an oxygen activated sludge wastewater treatment system (UNOX).

Collection system is an enclosed process.

2. Control Device or Method Code(s): **021, 099, 054**

Emissions Unit Details

1. Package Unit:	
Manufacturer:	Model Number:
2. Generator Nameplate Rating:	MW
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	See Comment	
4. Maximum Production Rate:	186 ADTUP/hr	
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	<p>Production rate represents digester system throughput. See Attachment JSF-EU17-B6. ADTUP = air-dried tons of unbleached pulp.</p> <p>Condensate collection system is designed to collect 7.2 lb HAP/ton oven-dried pulp (ODP) or more. Treatment system must remove at least 6.6 lb HAP/ton.</p>	

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CFR 60.11(a) – NSPS General Provisions
40 CFR 60.11(d)
40 CFR 60.11(f)
40 CFR 60.11(g)
40 CFR 60.12
40 CFR 60.19
40 CFR 60.283(a)(1)(i) – NSPS Subpart BB
40 CFR 60.283(a)(1)(iii)
40 CFR 60.7
40 CFR 63, Subpart A – General Provisions
40 CFR 63.443(a)(1)(i) – MACT Standards – LVHC System
40 CFR 63.443(c) - MACT Standards – Closed Vent Systems
40 CFR 63.443(e) – MACT Standards – Excess Emissions
40 CFR 63.446(a) – Standards for Kraft Pulping Process Condensates
40 CFR 63.446(b) – Standards for Kraft Pulping Process Condensates
40 CFR 63.446(c)(2) – Standards for Kraft Pulping Process Condensates
40 CFR 63.446(d) – Standards for Kraft Pulping Process Condensates
40 CFR 63.446(e)(2) – Standards for Kraft Pulping Process Condensates
40 CFR 63.446(e)(3) – Standards for Kraft Pulping Process Condensates
40 CFR 63.446(h) – Standards for Kraft Pulping Process Condensates
40 CFR 63.450 – Standards for Enclosures and Closed-Vent Systems
40 CFR 63.453(a) – Monitoring Requirements
40 CFR 63.453(k) – MACT Standards – Monitoring – Closed Vent Systems
40 CFR 63.453(l) – Monitoring Requirements
40 CFR 63.453(m) – Monitoring Requirements
40 CFR 63.453(n) – Monitoring Requirements
40 CFR 63.453(o) – Monitoring Requirements
40 CFR 63.454 – Recordkeeping Requirements

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CFR 63.454(a) – Recordkeeping Requirements
40 CFR 63.454(b) – MACT Standards - Recordkeeping
40 CFR 63.454(d) – MACT Standards - Recordkeeping
40 CFR 63.455 – Reporting Requirements
40 CFR 63.455(a) – Reporting Requirements
40 CFR 63.455(b) – Reporting Requirements
40 CFR 63.455(d) – Reporting Requirements
40 CFR 63.457 – Test Methods and Procedures
40 CFR 63.457(d) – MACT Standards - Test Methods and Procedures
40 CFR 63.457(e) – MACT Standards - Test Methods and Procedures
40 CFR 63.960 – Individual Drain Standards
40 CFR 63.961 – Individual Drain Standards
40 CFR 63.962 – Individual Drain Standards
40 CFR 63.964 – Individual Drain – Inspection and Monitoring Requirements
62-204.800(7)(b)35. – NSPS Subpart BB by Reference
62-296.404(3)(a)1.
62-296.404(3)(a)3. – TRS Venting
62-296.404(3)(e) – Lime Kilns Used to Incinerate TRS
62-296.404(3)(f) – Boilers Used to Incinerate TRS
62-296.404(4)(e)3. –TRS Test Method
62-296.404(4)(f) – Test Procedures
62-296.404(6) – Quarterly Reporting
62-296.404(6)(a)
62-296.404(6)(b)

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? *	2. Emission Point Type Code: 4	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):		
20. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: F	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: 77 °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: 0 feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):		
14. Emission Point Comment (limit to 200 characters): LVHC NCGs are vented to either the No. 4 Lime Kiln or the No. 5 Power Boiler (as backup), see Attachment JSF-EU17-D14. *Refer to Attachment JSF-EU17-J1.		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products: Sulfate (Kraft) Pulping, Digester Relief and Blow Tank: General		
2. Source Classification Code (SCC): 3-07-001-01		3. SCC Units: Tons Air-Dried Unbleached Pulp Produced
4. Maximum Hourly Rate: 186	5. Maximum Annual Rate: 1,627,320	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): See Attachment JSF-EU17-E10. Max Annual Rate is based on sum of maximum production rates for the Kamyr Digester System and the Batch Digester System.		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products: Sulfate (Kraft) Pulping, Multiple Effect Evaporator: General		
2. Source Classification Code (SCC): 3-07-001-03		3. SCC Units: Tons Air-Dried Unbleached Pulp Produced
4. Maximum Hourly Rate: 233	5. Maximum Annual Rate: 2,037,938	6. Estimated Annual Activity Factor:
23. Maximum % Sulfur:	24. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): See Attachment JSF-EU17-E10. The No. 5 MEE and No. 6 MEE maximum hours of operation are 8,736 and 8,760 hours/yr, respectively.		

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: TRS		2. Total Percent Efficiency of Control:	
3. Potential Emissions: * lb/hour		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 5 ppmvd @ 10% O₂ Reference: Rule 62-296.404(3)(f)1.		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters): *Allowable TRS limit is reflected in No. 4 Lime Kiln and No. 5 Power Boiler emission units.			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 5 ppmvd @ 10% O₂		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters): Incinerate TRS emissions for a minimum of 0.5 second at a minimum temperature of 1,200°F.			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Based on Rule 62-296.404(3)(f)1.			

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: _____ Model Number: _____ Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: JSF-EU17-J1 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input checked="" type="checkbox"/> Attached, Document ID: See Comment <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment: <p>JSC has previously submitted a MACT startup, shutdown, and malfunction (SSM) plan, as required by 40 CFR 63, Subpart A.</p>

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input checked="" type="checkbox"/> Attached, Document ID: JSF-EU1-J13 <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT JSF-EU17-A9
EMISSIONS UNIT COMMENT

ATTACHMENT JSF-EU17-A9**EMISSIONS UNIT COMMENT**

The Pulping System – MACT I emissions unit consists of the pulping system equipment regulated under 40 CFR 63, Subpart S, and with a compliance date of April 15, 2001. The regulated equipment includes the following:

- Kamyr Digester System
- Batch Digester System
- Nos. 5-6 Multiple Effect Evaporation (MEE) systems
- Turpentine Recovery System, and
- Foul Condensate Collection Tank.

JSC collects the low-volume, high concentration (LVHC) noncondensable gases (NCGs) from these sources. These NCGs are burned in the No. 4 Lime Kiln (primary control device) or the No. 5 Power Boiler (backup/secondary device) for TRS/HAP destruction.

The Kamyr Digester System consists of a chip steaming tank, continuous digester, two flash tanks, and a turpentine recovery system. The Batch Digester System consists of eight batch digesters, gas-off cyclone, turpentine primary (2) and secondary condensers, A and B line blow tanks, A and B line blow heat cyclones, blow heat primary and secondary condensers, and a blow heat accumulator tank. The Nos. 5-6 MEE systems include two MEEs and the associated condensers, Nos. 5 and 6 hot wells, and concentrators.

ATTACHMENT JSF-EU17-B6
OPERATING CAPACITY COMMENT

**ATTACHMENT JSF-EU17-B6
OPERATING CAPACITY COMMENT**

MAXIMUM PROCESS/THROUGHPUT RATE

Kamyr Digester System:

Hours of Operation: 8,736 hrs/yr

Batch Digester System:

Hours of Operation: 8,760 hrs/yr

No. 5 MEE System:

308,359 lbs (BLS)/hr

Hours of Operation: 8,736 hrs/yr

No. 6 MEE System:

274,089 lbs (BLS)/hr

Hours of Operation: 8,760 hrs/yr

MAXIMUM PRODUCTION RATE

Kamyr Digester System:

85 tons (ADUP)/hr or 1,819 tons (ADUP)/day*

85 tons (ADUP)/hr x 8,736 hr/yr = 742,560 tons (ADUP)/yr

Batch Digester System:

101 tons (ADUP)/hr or 1,391 tons (ADUP)/day*

101 tons (ADUP)/hr x 8,760 hr/yr = 884,760 tons (ADUP)/yr

* Daily rates for PSD and NSPS applicability only.

ATTACHMENT JSF-EU17-D14

EMISSIONS POINT COMMENT

ATTACHMENT JSF-EU17-D14
EMISSIONS POINT COMMENT

Emission Point Comment:

The NCGs from the Kamyr Digester System, Batch Digester System, and Nos. 5-6 MEE system are combusted in the No. 4 Lime Kiln which is the primary control device. NCGs from the turpentine decanter, weir box, and storage tank, the Kamyr blow tank, and the foul condensate collection tank are also collected and combusted in the No. 4 Lime Kiln. When the kiln is offline, NCG gases will be vented to the No. 5 Power Boiler.

The original white liquor scrubber for TRS is used whenever venting TRS gases at the No. 4 Lim Kiln.

ATTACHMENT JSF-EU17-E10

SEGMENT COMMENT

ATTACHMENT JSF-EU17-E10
SEGMENT COMMENT

COMMENT: SEGMENT NO. 1

Maximum Hourly Rate is the sum of the maximum hourly rates of 85 tons (ADUP)/hr from the Kamyrdigester System and 101 tons (ADUP)/hr from the Batch Digester System.

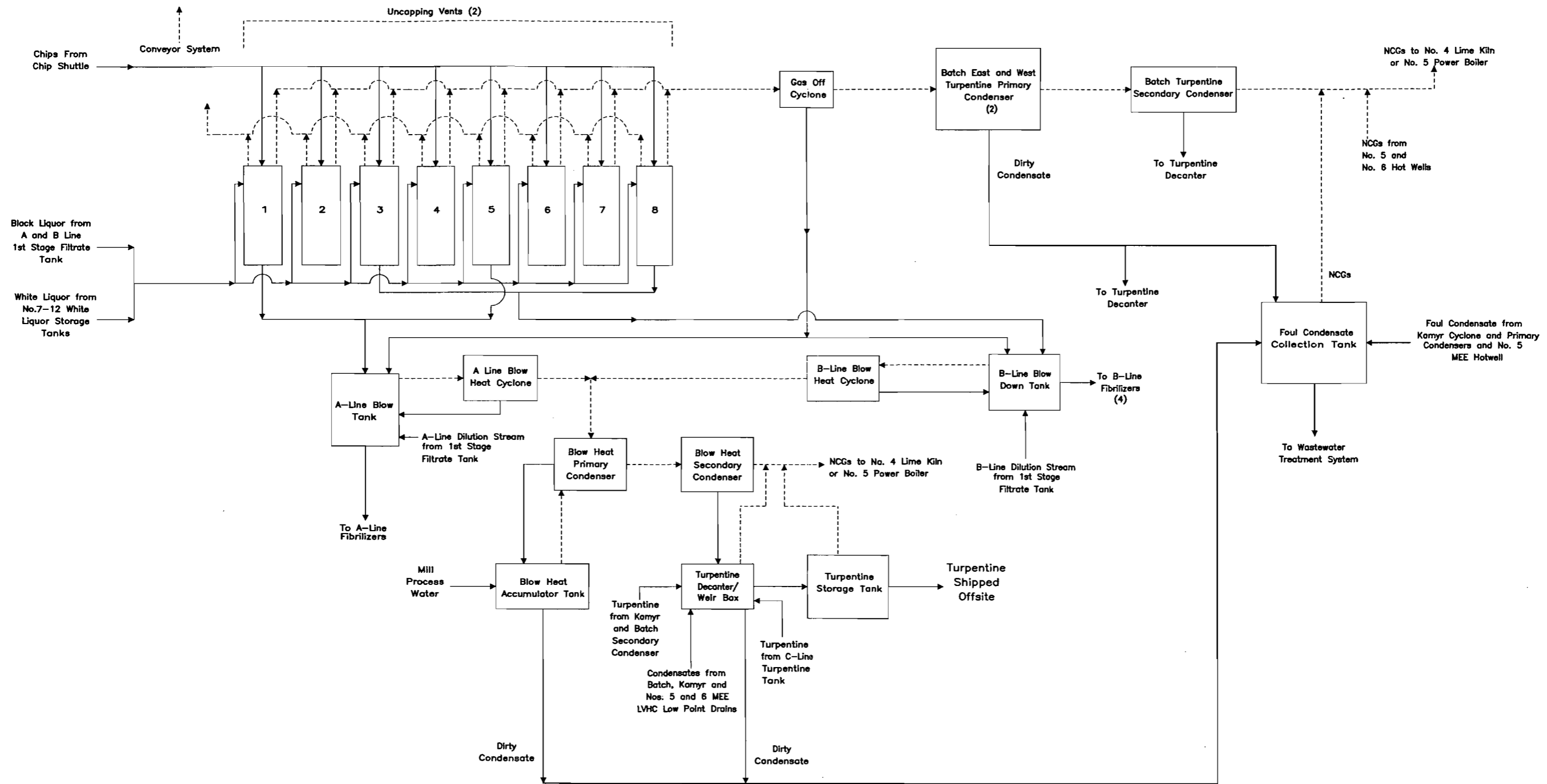
Maximum Annual Rate is the sum of the maximum hourly rates of 85 tons (ADUP)/hr for 8,736 hr/yr from the Kamyrdigester System and 101 tons (ADUP)/hr for 8,760 hr/yr from the Batch Digester System.

COMMENT: SEGMENT NO. 2

Maximum Hourly Rate is the sum of the maximum hourly rates of 308,359 lbs (BLS)/hr from the No. 5 MEE System and 274,089 lbs (BLS)/hr from the No. 6 MEE System and the conversion factor of 2,500 lbs (BLS)/ton (ADUP).

ATTACHMENT JSF-EU17-J1

PROCESS FLOW DIAGRAM



0237609/4/4.4/4.4.1/JSF-EU17-J1a BatchA.dwg

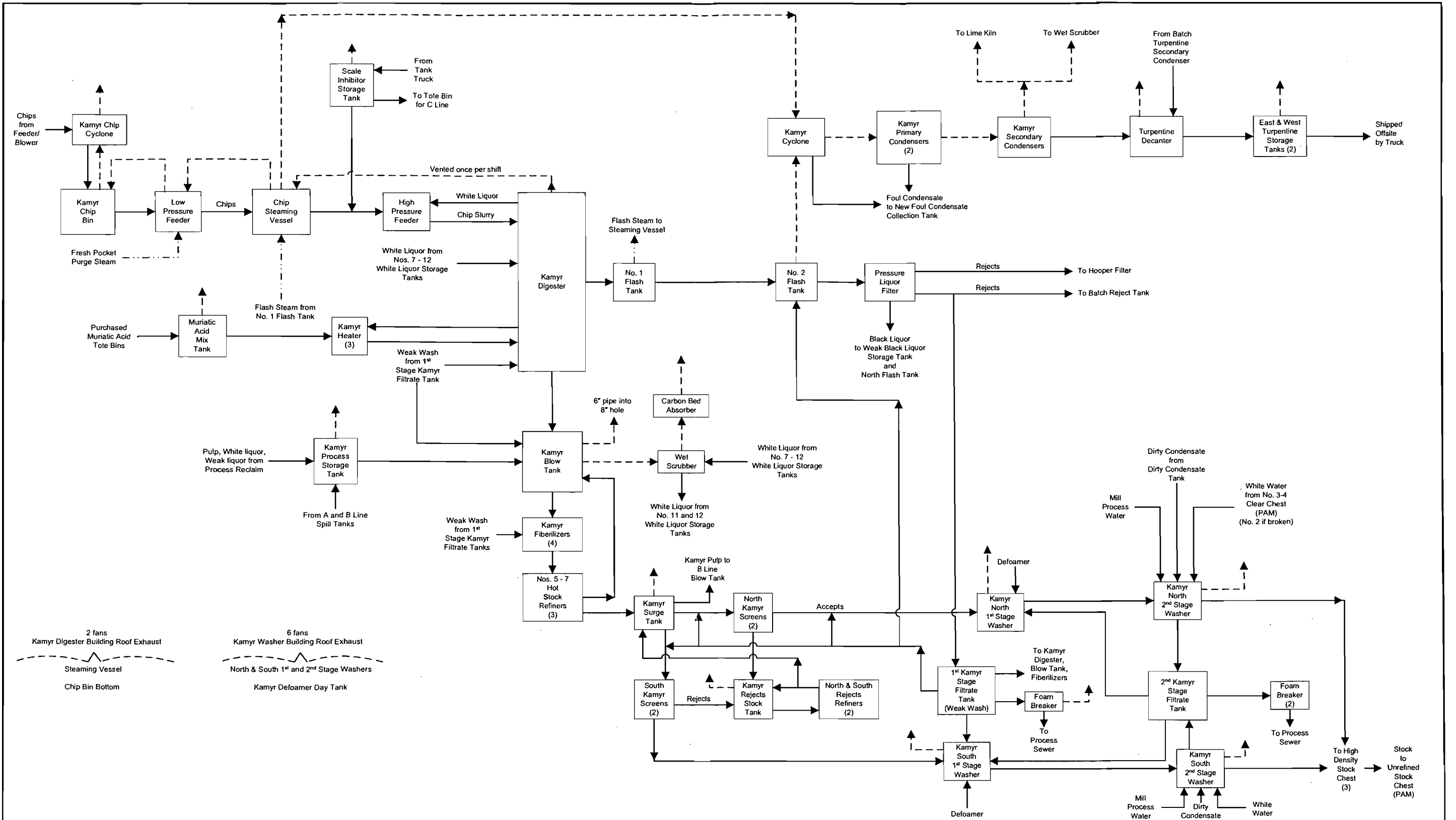
Process Flow Legend:

Solid / Liquid	→
Gas	----->

Jefferson Smurfit Corporation (U.S.)
 Process Flow Diagram: Pulping System - MACT 1
 JSF-EU17-J1a

Emission Unit:	Batch Digester System
Process Area:	Pulping Area
Filename:	BatchA.dwg
Latest Revision Date:	Revision #7 September 20, 2001

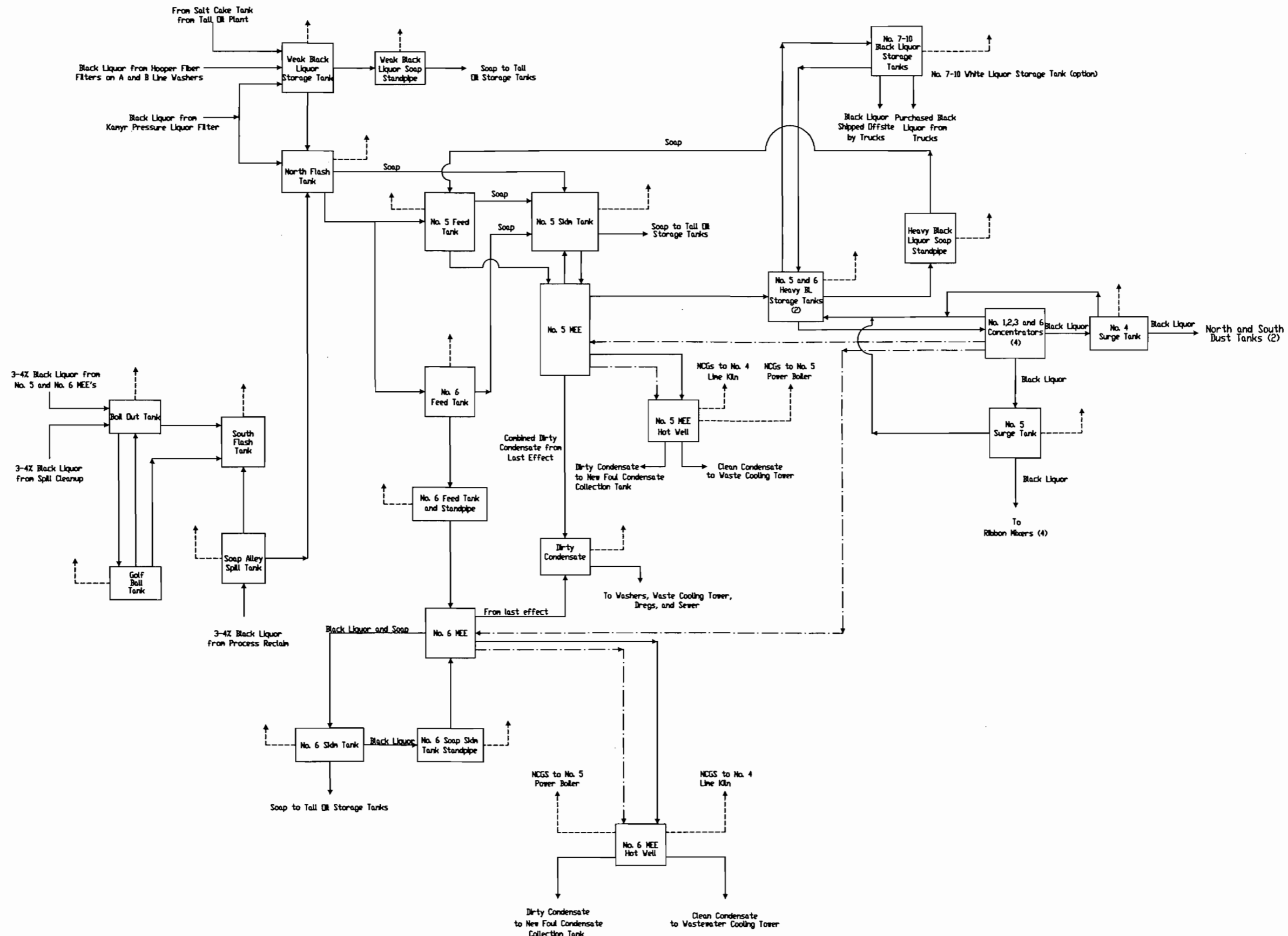




Attachment JSF-EU17-J1b. Process Flow Diagram
 Kamyr Digester System
 Jefferson Smurfit Corporation; Fernandina Beach, FL

Process Flow Legend
 Solid/Liquid ———→
 Gas - - - - -→
 Steam - · - - - -→





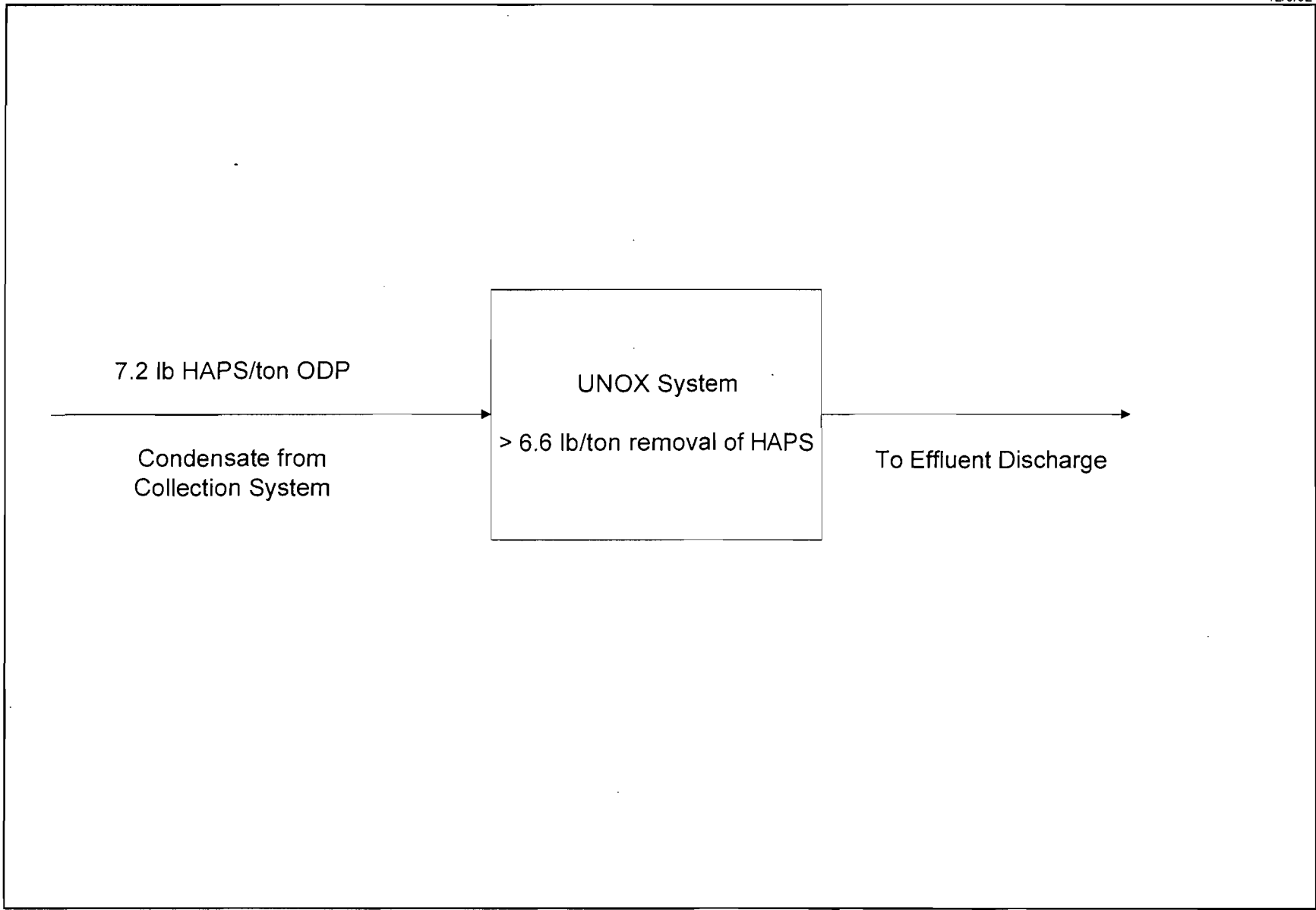
0237609/4/4.4/4.4.1/JSF-EU17-J1c no5rcvbA.dwg

Process Flow Legend	
Solid / Liquid	→
Gas	- - - - -
Steam	~ ~ ~ ~ ~

Jefferson Smurfit Corporation (U.S.)
 Fernandina Beach, FL
 Process Flow Diagram with MACT I
 JSF-EU17-J1c

Emission Unit	No. 5 and No. 6 Multiple Effect Evaporator (MEE) System
Process Area	Chemical Recovery
Filename	no5rcvbA.dwg
Latest Revision Date	September 21, 2001





Attachment JSF-EU17-J1d
Process Flow Diagram
Jefferson Smurfit Corp (U.S.)
Fernandina Beach, Florida

Process Area: Condensate System
Filename: JSF-EU17-J1D.VSD
Latest Revision Date: 12/9/2002

Process Flow Legend:
Solid / Liquid —————>



EMISSION UNIT 18

PACKAGE BOILER

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Package Boiler			
4. Emissions Unit Identification Number:		<input checked="" type="checkbox"/> No ID	
ID:		<input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		26	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Package boiler may operate only when another boiler is operated at a reduced rate or is shutdown.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Low-NO_x Burners2. Control Device or Method Code(s): **024****Emissions Unit Details**

1. Package Unit:

Manufacturer: **Nebraska Boiler**Model Number: **N25 789**

2. Generator Nameplate Rating:

MW

3. Incinerator Information:

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	190	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	See Comment	
4. Maximum Production Rate:	150,000 lb steam/hr	
5. Requested Maximum Operating Schedule:	24	hours/day
	7	days/week
	52	weeks/year
	8,760	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p>Package Boiler will be operated only when another boiler is operated at a reduced rate or is shutdown. The Package Boiler will be limited to 1,318,800 gallons of No. 2 fuel oil per year.</p>		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CRF 60.7(b) – General NSPS Provision
40 CRF 60.7(f)
40 CRF 60.11(b)
40 CRF 60.11(c)
40 CRF 60.11(e)(1)
40 CRF 60.13(i)(2)
40 CRF 60.42b(a) – NSPS for Industrial Boilers
40 CRF 60.42b(g)
40 CRF 60.42b(j)(2)
40 CRF 60.43b(f)
40 CRF 60.43b(g)
40 CRF 60.44b(k)
40 CRF 60.45b(j)
40 CRF 60.46b(a)
40 CRF 60.46b(d)(7)
40 CRF 60.46b(g)
40 CRF 60.47b(f)
40 CRF 60.48b(a)
40 CRF 60.48b(i)
40 CRF 60.49b(a)
40 CRF 60.49b(b)
40 CRF 60.49b(d)
40 CRF 60.49b(f)
40 CRF 60.49b(h)(1)
40 CRF 60.49b(h)(3)
40 CRF 60.49b(j)
40 CRF 60.49b(o)
40 CRF 60.49b(p)
40 CRF 60.49b(q)(1)
40 CRF 60.49b(r)
40 CRF 60.49b(v)
40 CRF 60.49b(w)
Rule 62-204.800(7)(b)3, F.A.C.
Rule 62-296.406, F.A.C.
Rule 62-297.310(1), F.A.C.
Rule 62-297.310(2)(a), F.A.C.
Rule 62-297.310(4)(a), F.A.C.
Rule 62-297.310(5), F.A.C.
Rule 62-297.310(7), F.A.C.
Rule 62-297.310(8), F.A.C.
Rule 62-297.401(9)(a), F.A.C.

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? Pack. Boiler		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
21. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 100 feet	7. Exit Diameter: 1.7 feet	
8. Exit Temperature: 250 °F	9. Actual Volumetric Flow Rate: 36,000 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External Combustion Boilers; Industrial; Distillate Oil; Grades 1 and 2 Oil		
2. Source Classification Code (SCC): 1-02-005-01		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 1.3	5. Maximum Annual Rate: 1,138.8	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.5	8. Maximum % Ash:	9. Million Btu per SCC Unit: 146
10. Segment Comment (limit to 200 characters): Maximum hourly rate based on 190 MMBtu/hr. Maximum annual rate based on limit of 1,138,800 gallons per year of No. 2 fuel oil.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
25. Maximum % Sulfur:	26. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 88.8 lb/hour 38.9 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.5 % S Fuel Oil Reference: See Comment		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): See Attachment JSF-EU18-G8.			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): The package boiler complies by burning No. 2 fuel oil with a maximum sulfur content of 0.5 percent.			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.5 % S fuel oil		4. Equivalent Allowable Emissions: 88.8 lb/hour 38.9 tons/year	
5. Method of Compliance (limit to 60 characters): Fuel oil analysis.			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 40 CFR 60, Subpart Db and Rule 62-296.406, F.A.C.			

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: 27 % Maximum Period of Excess Opacity Allowed: 6 min/hour	
4. Method of Compliance: EPA Method 9	
5. Visible Emissions Comment (limit to 200 characters): 40 CFR 60.43b(f). See Attachment JSF-EU18-H5 for alternate sampling plan.	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): 	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram [<input checked="" type="checkbox"/>] Attached, Document ID: <u>JSF-EU18-J1</u> [<input type="checkbox"/>] Not Applicable [<input type="checkbox"/>] Waiver Requested
2. Fuel Analysis or Specification [<input checked="" type="checkbox"/>] Attached, Document ID: <u>JSF-EU18-J2</u> [<input type="checkbox"/>] Not Applicable [<input type="checkbox"/>] Waiver Requested
3. Detailed Description of Control Equipment [<input type="checkbox"/>] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [<input type="checkbox"/>] Waiver Requested
4. Description of Stack Sampling Facilities [<input type="checkbox"/>] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [<input type="checkbox"/>] Waiver Requested
5. Compliance Test Report [<input type="checkbox"/>] Attached, Document ID: _____ [<input type="checkbox"/>] Previously submitted, Date: _____ [<input checked="" type="checkbox"/>] Not Applicable
6. Procedures for Startup and Shutdown [<input type="checkbox"/>] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [<input type="checkbox"/>] Waiver Requested
7. Operation and Maintenance Plan [<input type="checkbox"/>] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [<input type="checkbox"/>] Waiver Requested
8. Supplemental Information for Construction Permit Application [<input type="checkbox"/>] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable
9. Other Information Required by Rule or Statute [<input type="checkbox"/>] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation [] Attached, Document ID: _____ [X] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [X] Attached, Document ID: JSF-EU18-J13 [] Not Applicable
14. Compliance Assurance Monitoring Plan [] Attached, Document ID: _____ [X] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [X] Not Applicable

ATTACHMENT JSF-EU18-G8
EMISSION CALCULATIONS

Attachment JSF-EU18-G8. Maximum SO₂ Emissions from the Package Boiler, JSC Fernandina Beach

Emission Factor	Ref.	Activity Factors ^a		Hourly	Annual
		Hourly	Annual	Emissions (lb/hr)	Emissions (TPY)
0.0683 lb/gal	1	1.3 Mgal/hr	1,138.8 Mgal/yr	88.79	38.9

^a Based on maximum allowable No. 2 fuel oil usage.

Note: M = 1,000

References:

1. Stoichiometric calculation: $\text{lb/hr SO}_2 = 6.83 \text{ lb/gal} \times 0.005 \text{ lb S/lb} \times 2 \text{ lb SO}_2/\text{lb S} = 0.0683 \text{ lb SO}_2/\text{gal}$.

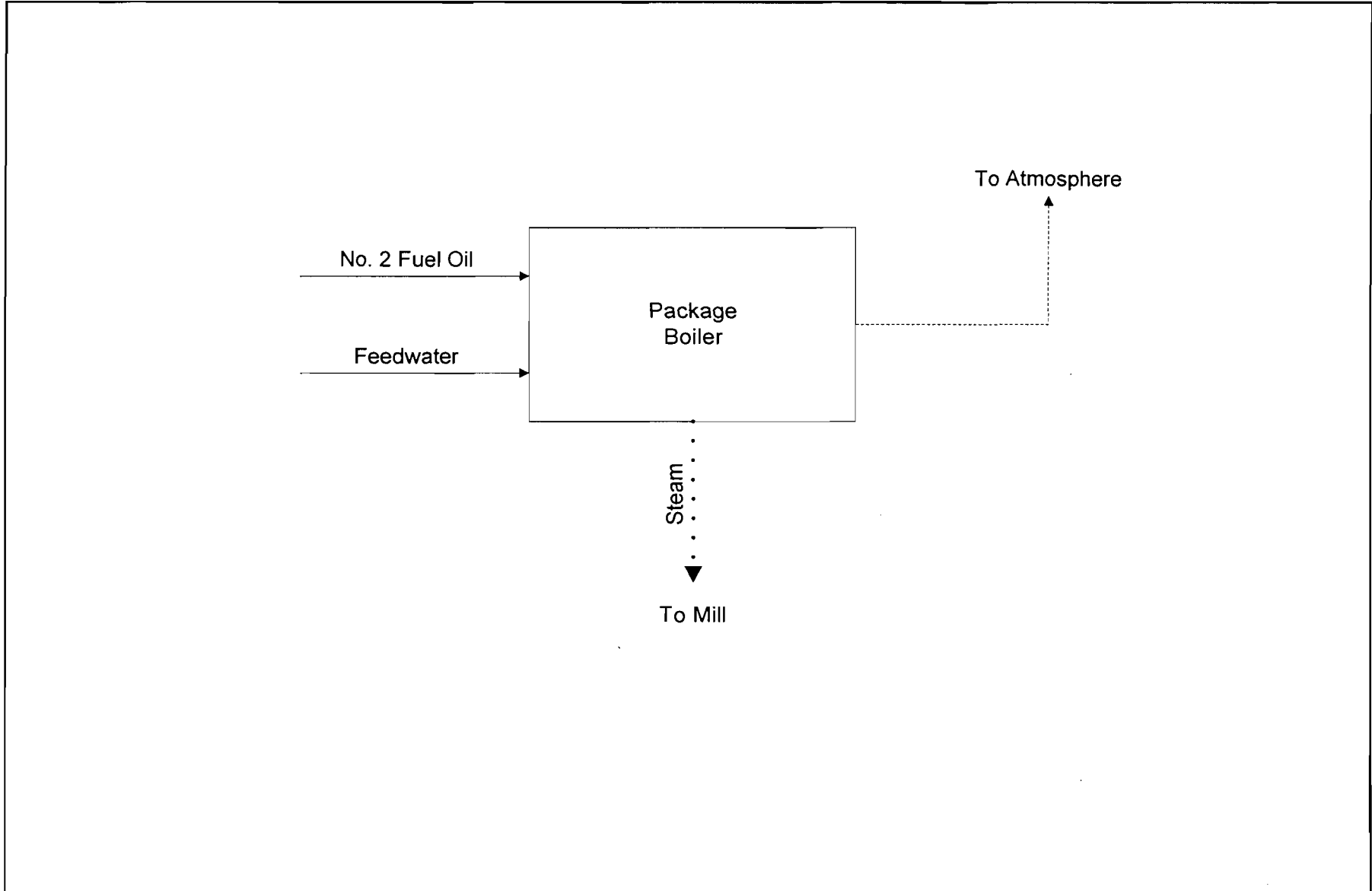
ATTACHMENT JSF-EU18-H5
VISIBLE EMISSIONS COMMENT

ATTACHMENT JSF-EU18-H5**VISIBLE EMISSIONS COMMENT**

In order to demonstrate compliance with applicable visible emission (VE) limits of this package boiler, the following monitoring plan will be implemented:

- EPA Method 9 test shall be performed during each calendar year, if the boiler is operated during the calendar year.
- An EPA Method 9 trained and certified VE observer shall perform a 6-minute opacity test once during the 8 am to 4 pm day shift whenever this package boiler is operated in excess of six (6) hours on the day shift excluding weekends, holidays and weather conditions which make testing impractical or invalid. If the opacity reading exceeds 10 percent for a 6-minute test, the observer will continue the readings for another 12 minutes to obtain a total of three (3) 6-minute tests.

ATTACHMENT JSF-EU18-J1
PROCESS FLOW DIAGRAM



Attachment JSF-EU18-J1
Package Boiler
Process Flow Diagram
Jefferson Smurfit Corp.
Fernandina Beach, Florida

Process Flow Legend	
Solid/Liquid	—————▶
Gas	- - - - -▶
Steam▶

Package Boiler	
Filename:	JSF-EU18-J1.VSD
Date:	12/07/02



ATTACHMENT JSF-EU18-J2

FUEL ANALYSIS

**ATTACHMENT JSF-EU18-J2
FUEL ANALYSIS FOR
PACKAGE BOILER**

Parameter	No. 2 Fuel Oil (0.5% S max)
Density (lb/gal)	6.83
Approximate Heating Value (Btu/lb)	21,376
Approximate Heating Value (Btu/gal)	146,000
<u>Ultimate Analysis (dry basis) ^a:</u>	
Carbon	87.3%
Hydrogen	12.6%
Nitrogen	0.006%
Oxygen	0.04%
Sulfur	0.5%
Ash/Inorganic	<0.01%
Moisture	--

^a Source: Perry's Chemical Engineer's Handbook. Sixth Edition, 1984.
Represents average fuel characteristics.

ATTACHMENT JSF-EU18-J13

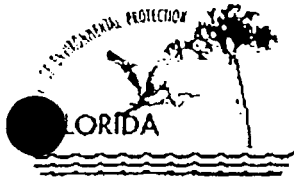
IDENTIFICIATION OF ADDITIONAL APPLICABLE REQUIREMENTS

DOC: Jim Smith
Dennis Little
Kevin Gregory
James Anderson

Gerald Dowless, JSC Div., Jax
Janet Carl, JSC Corp., Clayto
Dave Buff, KBN
Penelope Widen, KBN
Clarence Presha

Department of

Environmental Protection



Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Virginia B. Wetherell
Secretary

CERTIFIED - RETURN RECEIPT

February 29, 1996

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

Dear Mr. Flenniken:

Nassau Co. - AP
Container Corporation of America
Package Boiler

This is in response to the operation status letter received 03-23-95 and the 12-15-95 meeting concerning the operation of the Package Boiler temporary exemption request/permit issue discussion.

This letter continues the Department's approval for the operation of this package boiler as provided by the previous approval letters of 12-01-92 and 12-22-93 and is subject to the following conditions:

1. This package boiler shall be operated only when either a power boiler or a recovery boiler is not in operation or being operated at a reduced rate such that there is not a net emissions increase.
2. The permittee shall maintain records of the operation this package boiler as follows:
 - A. The hours of operation of this package boiler.
 - B. Identification of the power boiler or recovery boiler which is shutdown or whose operation is reduced, the time period of the shutdown or reduced operation and the reduced capacity of the boiler involved. This information shall be included in the quarterly emissions report submitted to the Department.
3. The fuel fired shall be No. 2 distillate oil and shall not exceed 1,300 gals/hr. The maximum annual capacity for No. 2 distillate oil fired in this package boiler shall not exceed 10% of a heat input basis or 1,138,800 gallons per year.
4. In order demonstrate compliance with applicable visible emissions limits for this package boiler, the following monitoring program shall be implemented:
 - A. An EPA Method 9 test shall be performed annually, within 60 days of March 1 each year.
 - B. An EPA Method 9 trained and certified visible emissions observer shall perform a 6-minute opacity test once during the 8 am to 4 pm day shift whenever this package boiler is operated in excess of six (6) hours on the day shift excluding weekends, holidays and weather conditions which make testing impractical or invalid. If the opacity reading exceeds 10% for a 6-minute test, the observer will continue the readings for another 12 minutes to obtain a total of three (3) 6-minute tests.

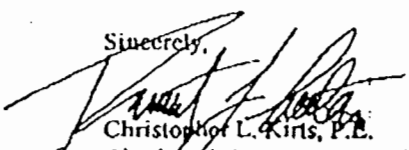
Container Corporation of America
Package Boiler
Page 2

4. C. The permittee will follow the manufacturer's maintenance schedule and procedures to assure that serviceable components are well maintained.
5. This approval expires when the Title V permit is issued.

This package boiler shall be included in the Title V application as backup unit operating scenarios for the power and recovery boilers.

If there are any questions, please contact Johnny Cole at 904-448-4310 ext. 236.

Sincerely,


Christopher L. Kirs, P.E.
District Air Program Administrator

CLK:JLC

ATTACHMENT A

TO BE PROVIDED