



## 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

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

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  
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of the Kamyrdigester 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  
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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

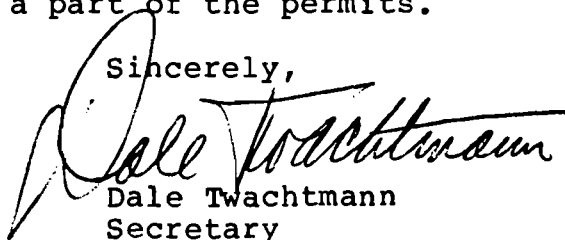
7. Mr. Paul J. Magnell's letter dated May 2, 1988, and received May 6, 1988.

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

ATTACHMENT 11  
PERMITS AC 45-141871 and -141872

ATTACHMENT 7  
PERMIT AC 45-141874

ATTACHMENT 8  
PERMIT AC 45-141875

3 May 1988  
Jennine Beck, FL

# JSC/CCA

JEFFERSON: SMURFIT CORPORATION & CONTAINER CORPORATION OF AMERICA

RECEIVED

May 2, 1988

MAY 06 1988

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

DER-BAQM

Mr. Bruce Mitchell  
Florida Department of Environmental  
Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Construction Permits No. AC 45-141872 and No. AC 45-141871

Dear Mr. Mitchell:

Pursuant to our telephone conversation of April 28, Container Corporation of America would like to request hereby the following changes to the referenced construction permits. As we discussed, we are in agreement that this language more accurately reflects the requirements of the TRS rule and the practical limitations of the digesting systems in terms of monitoring production and utilization rates.

**Permit No. AC 45-141872 - Batch Digester System  
Specific Condition No. 2**

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 1391 TPD ADP (tons per day of air-dried pulp based on a nominal utilization rate of 2690 TPD of wood chips (dry) and 5620 TPD of cooking liquor).

**Permit No. AC 45-141871 - Kamyrdigester System  
Specific Condition No. 2**

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 of the Kamyrdigester system will be 1819 TPD ADP (tons per day of air-dried pulp based on a nominal utilization rate of 3210 TPD of wood chips (dry) and 16830 TPD of cooking liquor).

Mr. Bruce Mitchell  
Page 2  
May 2, 1988

Thank you for your attention to this request.

Sincerely,



Paul J. Magne  
General Manager

PJM/js

cc: E. E. Frey - FDER, Jax

Copied Bruce Mitchell  
Bradley Rival } 5.9.88 (mf)  
CHF/BT



Bruce

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

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

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

April 19, 1988

Enclosed are permits Nos. AC 45-141871, -141872, -141873, -141874, -141875, -141877, and -141878, for Container Corporation of America to make several changes at its existing mill in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2 and to modernize the existing causticizing system. The changes include replacement of some existing equipment, addition of some new equipment, and the collection, transportation and incineration of the TRS gases. The TRS gases will be incinerated in a new 630 TPD lime kiln (No. 4), which will replace the existing Nos. 2 and 3 lime kilns at Container Corporation of America's facility located in Fernandina Beach, Nassau County, Florida. These permits are issued pursuant to Section 403, Florida Statutes.

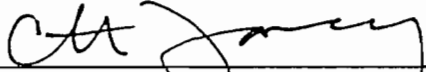
Any Party to these permits has the right to seek judicial review of the permits pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee,

Mr. Paul J. Magnell, General Manager  
April 19, 1988  
Page Two

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 these permits are filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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

Copies furnished to:

B. Stewart, NE Dist.  
B. Williams, JSC  
R. Hagan, CCA  
D. Buff, P.E., KBN  
B. Pittman, Esq.

Final Determination

Container Corporation of America  
Nassau County  
Fernandina Beach, Florida

State Construction Permits:

AC 45-141871  
45-141872  
45-141873  
45-141874  
45-141875  
45-141877  
45-141878

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

April 12, 1988

## Final Determination

The construction permit applications have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in the Fernandina Beach News-Leader on March 3, 1988. The Technical Evaluation and Preliminary Determination (TE and PD) were available for public inspection at the Department's Northeast District office and Bureau of Air Quality Management office.

Comments were received from Mr. Paul J. Magnell, General Manager of Container Corporation of America (CCA) on March 15, 1988, and Mr. Roger P. Hagan, Technical Director of CCA, on April 1, 1988. CCA's Variance, OCG Case No. VE-45-313, which was signed by Secretary Twachtman on March 15, 1988, affects the final determination. An Interoffice Memorandum dated March 15, 1988, by Bruce Mitchell, was offered as comments. The Bureau's responses to the comments will follow:

A. The Variance, VE-45-313, effectively changes the final compliance date for the Kamyrd digester system, batch digester system and No. 5 Multiple Effect Evaporator system, from May 12, 1989, to June 1, 1990. Therefore, the following will be changed:

1. AC 45-141871, -141872, and 141873  
Expiration Date:

From: September 24, 1989  
To: October 14, 1990

2. AC 45-141871  
Specific Condition:  
No. 10:

From: Pursuant to FAC Rule 17-2.600(4)(c)1.d., the Kamyrd digester system is subject to the provisions of FAC Rule 17-2.960(1), Compliance Schedules, which requires that final compliance be demonstrated by May 12, 1989, unless the Variance, OGC Case No. VE-45-313, is approved to allow final compliance by June 1, 1990.

To: Pursuant to VE-45-313, the Kamyrd digester system shall be in final compliance by June 1, 1990, and the permittee shall provide proof of final compliance to the DER's Northeast District office by July 16, 1990.

3. AC 45-141872  
Specific Condition:  
No. 10:

From: Pursuant to FAC Rule 17-2.600(4)(c)1.d., the batch digester system is subject to the provisions of FAC Rule 17-2.960(1), Compliance Schedules, which requires that final compliance be demonstrated by May 12, 1989, unless

the Variance, OGC Case No. VE-45-313, is approved to allow final compliance by June 1, 1990.

To: Pursuant to VE-45-313, the batch digester system shall be in final compliance by June 1, 1990, and the permittee shall provide proof of final compliance to the DER's Northeast District office by July 16, 1990.

4. AC 45-141873

Specific Condition:

No. 8:

From: Pursuant to FAC Rule 17-2.600(4)(c)1.d., the No. 5 MEE System is subject to the provisions of FAC Rule 17-2.960(1), Compliance Schedules, which requires that final compliance be demonstrated by May 12, 1989, unless the Variance, OGC Case No. VE-45-313, is approved to allow final compliance by June 1, 1990.

To: Pursuant to VE-45-313, the No. 5 MEE system shall be in final compliance by June 1, 1990, and the permittee shall provide proof of final compliance to the DER's Northeast District office by July 16, 1990.

5. AC 45-141877

Specific Condition:

No. 13:

From: For the affected sources, the permittee shall provide proof to the DER's Northeast District office of compliance with FAC Rule 17-2.960(1)(d)1.b., by May 12, 1989, unless the Variance OGC Case No. VE-45-313, is approved to allow final compliance by June 1, 1990.

To: Pursuant to VE-45-313, the Kamyrdigester system, batch digester system and No. 5 Multiple Effect Evaporator system, shall be in final compliance by June 1, 1990, and the permittee shall provide proof of final compliance to the DER's Northeast District office by July 16, 1990.

B. Mr. Magnell's letter received on March 15, 1988, was followed by a meeting on March 24, 1988, and Mr. Hagan's letter received April 1, 1988. Since the meeting resolved the issues contained in Mr. Magnell's letter and CCA's final comments were addressed in Mr. Hagan's letter, the Bureau will respond to only Mr. Hagan's comments:

1. AC 45-141871

The Bureau agrees with the request and the following will be changed:

Specific Condition:

No. 2:

From: The production rate of the Kamyr digester system shall not exceed 1819 TPD ADP (tons per day of air dried pulp and based on a nominal utilization rate of 264,798 lbs/hr wood chips (dry) and 1,388,110 lbs/hr black/white liquor).

To: The maximum production rate of the Kamyr 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.

2. AC 45-141872

The Bureau agrees with the request and the following will be changed:

Specific Condition:

No. 2:

From: The maximum production rate of the batch digester system shall not exceed 1391 TPD ADP (tons per day of air dried pulp and based on a nominal utilization rate of 212,418 lbs/hr wood chips (dry) and 443,954 lbs/hr of black/white liquor).

To: 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 black/white liquor. For PSD purposes, the maximum production rate shall not exceed 1391 TPD ADP.

3. AC 45-141873

No response is required.

4. AC 45-141875

No response is required.

5. AC 45-141877

Specific Conditions:

- a. The error on the hourly PM emission limit was consistently used in the TE and PD and draft permit, even though the

annual limit was and is correctly used. Therefore, the following will be changed:

No. 4:

From: In accordance with 40 CFR 60.282(a)(3), the particulate matter (PM) emissions from the No. 4 Lime Kiln and its associated ESP control system shall not exceed 0.30 g/dscfm (0.13 gr/dscf; 45.3 lbs/hr, 190.0 TPY) corrected to 10% oxygen when liquid fossil fuel is burned.

To: In accordance with 40 CFR 60.282(a)(3), the particulate matter (PM) emissions from the No. 4 Lime Kiln and its associated ESP control system shall not exceed 0.30 g/dscfm (0.13 gr/dscf; 43.5 lbs/hr, 190.0 TPY) corrected to 10% oxygen when liquid fossil fuel is burned.

- b. The Bureau agrees with the comment to incorporate the affected sources in Specific Condition No. 13. See A.5. of the final determination.
- c. The language will better express the intent of this condition and the following will be changed:

No. 19:

From: The No. 4 Lime Kiln shall be tested for TRS and SO<sub>2</sub> emissions before and after connecting the TRS NCG handling system to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The TRS emissions tests, using EPA Methods 3 and 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to verify complete destruction of the pollutant. The SO<sub>2</sub> emissions tests, using EPA Method 6 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to establish the overall removal efficiency of the No. 4 Lime Kiln. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee(s) pursuant to FAC Rule 17-4 for the NCG handling system's associated sources (see Specific Condition No. 8).

To: The No. 4 Lime Kiln shall be tested for TRS and SO<sub>2</sub> emissions before and after connecting the TRS NCG handling system to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The TRS emissions tests, using EPA Methods 3 and 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to demonstrate the destruction efficiency of the pollutant. The SO<sub>2</sub> emissions tests, using EPA Method 6 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to establish the overall removal efficiency

of the No. 4 Lime Kiln. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee(s) pursuant to FAC Rule 17-4 for the NCG handling system's associated sources (see Specific Condition No. 8).

- d. Since other sources at the mill are permitted to fire fuel oil with 3.0% sulfur content, by weight, the following will be changed:

No. 22:

From: A separate No. 6 fuel oil storage tank shall be provided to store the fuel oil with the maximum 3.0% sulfur content, by weight, which will be permitted for use exclusively in the No. 4 Lime Kiln.

To: Deleted.

- C. Based on the Interoffice Memorandum of March 15, 1988, the following will be changed:

1. AC 45-141873

Specific Condition:

No. 3:

From: The No. 5 MEE System is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.400(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 4 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 8 ppmvd corrected to 10% O<sub>2</sub>, in accordance with 40 CFR 60.283(a)(1).

To: The No. 5 MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 4 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 8 ppmvd corrected to 10% O<sub>2</sub>, in accordance with 40 CFR 60.283(a)(1).



2. AC 45-141874

Specific Condition:

No. 8:

From: Pursuant to FAC Rule 17-2.400(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.

To: 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.

3. AC 45-141877

Specific Conditions:

a. No. 21:

From: The No. 2 and No. 3 Lime Kilns shall be shutdown and their operating permits surrendered to the DER's Northeast District office no later than the expiration date of this permit.

To: The No. 2 and No. 3 Lime Kilns shall be shutdown and their operating permits surrendered to the DER's Northeast District office no later than November 12, 1990.

b. Since Specific Condition No. 22 was deleted (see B.5.d. of the final determination), the following condition will be inserted:

No. 22: (New)

The No. 4 Lime Kiln shall be in final compliance by November 12, 1990, in accordance with FAC Rule 17-2.960(1)(d)3.b.(ii), and the permittee shall provide proof of final compliance to the DER's Northeast District office by December 27, 1990.

Attachments to be Incorporated:

A. AC 45-141871 and -141872

8. Mr. Paul J. Magnell's letter dated March 10, 1988, and received March 15, 1988.

9. VE-45-313 dated/signed March 15, 1988.
  10. Mr. Roger P. Hagan's letter dated March 25, 1988, and received April 1, 1988.
- B. AC 45-141873
8. Mr. Paul J. Magnell's letter dated March 10, 1988, and received March 15, 1988.
  9. Bruce Mitchell's Interoffice Memorandum dated March 15, 1988.
  10. VE-45-313 dated/signed March 15, 1988.
  11. Mr. Roger P. Hagan's letter dated March 25, 1988, and received April 1, 1988.
- C. AC 45-141874
6. Bruce Mitchell's Interoffice Memorandum dated March 15, 1988.
- D. AC 45-141875
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.
- E. AC 45-141877
8. Mr. Paul J. Magnell's letter dated March 10, 1988, and received March 15, 1988.
  9. Bruce Mitchell's Interoffice Memorandum dated March 15, 1988.
  10. Mr. Roger P. Hagan's letter dated March 25, 1988, and received April 1, 1988.

The Bureau will incorporate the changes in the appropriate construction permits, as referenced above in the final determination. It is recommended that the construction permits be issued as drafted, with the above revisions and attachments incorporated.

14 March 1988  
Fernandina Beach, FL

DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF INTENT

Comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.  
11-3-88  
319

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Container Corporation of America (CCA), to construct/install a new 630 TPD lime kiln (No. 4), which will replace the existing Nos. 2 and 3 Lime Kilns. CCA also proposes to make several changes at its existing facility in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2 and to modernize the existing causticizing system, which includes replacement of some existing equipment, addition of some new equipment, and the collection, transportation, and incineration of TRS noncondensable gases (NCG) from various sources. The TRS NCG gases will be incinerated in the proposed new No. 4 Lime Kiln. Control systems will be installed on TRS sources that will not be associated with the TRS NCG system, such as the Tail Oil Plant operations and the No. 4 Smelt Dissolving Tank. The location of the proposed modification

and project will be CCA's existing facility in Fernandina Beach, Nassau County, Florida. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirement of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-6.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The applications are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holiday, at:  
Dept. of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Dept. of Environmental Regula-

# News-Leader

Published Weekly

FERNANDINA BEACH, NASSAU COUNTY, FLORIDA

RECEIVED

MAR 15 1988

DER-BAQM

STATE OF FLORIDA  
COUNTY OF NASSAU:

Before the undersigned authority personally appeared

Bett Yates Adams

who on oath says that he is Business Manager of The Fernandina Beach News-Leader a weekly newspaper published at Fernandina Beach in Nassau County Florida; that the attached copy of advertisement, being a Legal Notice

in the matter of Notice of Intent

in the Nassau Court, was published in said newspaper in the issues of 3-3-88

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

Sworn to and subscribed before me

this 4th day of March

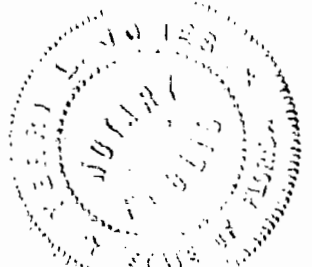
*Bett Yates Adams*

A.D. 1988

Jerry R. Jones  
(SEAL) Notary Public

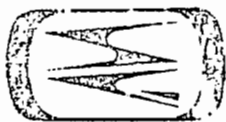
NOTARY PUBLIC, STATE OF FLORIDA  
My commission expires Feb. 24, 1990

Copied: Bruce Mitchell }  
Pradeep Rawal } 3-16-88 (m)



14 March 1988

Fernandina Beach, FL



JSC/CCA

JEFFERSON SMURFIT CORPORATION & CONTAINER CORPORATION OF AMERICA

Mill Division

NORTH 3TH STREET  
P.O. BOX 2001  
FERNANDINA BEACH - FL 32054  
TELEPHONE 904 261-5551

RECEIVED

March 14, 1988

MAR 15 1988

DER-BAQM

Mr. Bruce Mitchell  
Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Mitchell:

Please find enclosed a certified copy of the public notice pertaining to the Department's notice of intent to issue the construction permits for the TRS compliance project.

If you have any questions, please contact Roger Hagan at (904) 261-5551.

Sincerely,

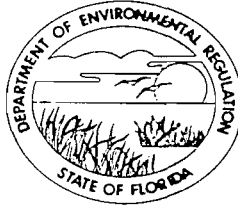
Paul J. Magne  
General Manager

PJM/js  
Enclosure

cc: E. E. Frey - DER, Jax

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

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

Permit Number: AC 45-141871  
Expiration Date: October 14, 1990  
County: Nassau  
Latitude/Longitude: 30° 40' 53"N  
81° 27' 26"W  
Project: Kamyр Digester 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 Kamyр digester system and the construction/installation of a noncondensable gas (NCG) handling system to capture and deliver pollutant emissions to the new No. 4 Lime Kiln for incineration. The existing Kamyр consists of a chip steaming tank, continuous digester, blow tank, two flash tanks, and a turpentine recovery system. Two new flash tanks and turpentine recovery system will be constructed to replace the existing ones. For PSD purposes, the maximum daily pulp production will be 1819 TPD ADP (tons per day of air dried pulp). 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 Kamyр Digester System 3-07-001-01

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

AC 45-141871

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. Mr. C. H. Fancy's letter dated January 22, 1988.
6. Mr. Paul J. Magnell's letter dated February 23, 1988, and received February 24, 1988.
7. Technical Evaluation and Preliminary Determination dated March 1, 1988.
8. Mr. Paul J. Magnell's letter dated March 10, 1988, and received March 15, 1988.
9. VE-45-313 dated/signed March 15, 1988.
10. Mr. Roger P. Hagan's letter dated March 25, 1988, and received April 1, 1988.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141871  
Expiration Date: October 14, 1990

**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 45-141871  
Expiration Date: October 14, 1990

**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 45-141871  
Expiration Date: October 14, 1990

**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 45-141871  
Expiration Date: October 14, 1990

**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 Kamyrdigester system's operating hours shall not exceed 8736 hours per year.
2. 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.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141871  
Expiration Date: October 14, 1990

**SPECIFIC CONDITIONS:**

3. The Kamyr digester system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 4 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 8 ppmvd corrected to 10% O<sub>2</sub>, in accordance with 40 CFR 60.283(a)(1).
- 4: The Kamyr digester system is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.
5. Objectionable odors shall not be allowed off of plant property in accordance with FAC Rule 17-2.620(2).
6. The Kamyr digester system is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.
7. The Kamyr digester system is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.
8. Compliance tests using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be conducted if the permittee does not incinerate the TRS gases from the Kamyr digester system in the No. 4 Lime Kiln.
9. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.
10. Pursuant to VE-45-313, the Kamyr digester system shall be in final compliance by June 1, 1990, and the permittee shall provide proof of final compliance to the DER's Northeast District office by July 16, 1990.
11. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141871  
Expiration Date: October 14, 1990

SPECIFIC CONDITIONS:

12. The DER's Northeast District office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the NE District office within 45 days of test completion.

13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results, the Certificate of Completion, and the contingency plan, 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. Operation beyond the construction permit expiration date requires a valid permit to operate. (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)

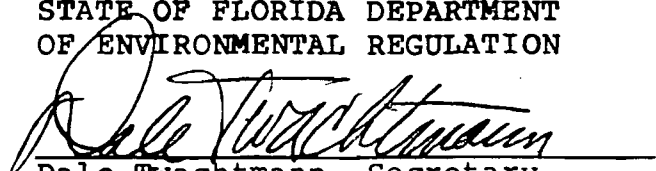
14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to DER's Bureau of Air Quality Management office and Northeast District office.

15. The No. 4 Lime Kiln construction/operating permit(s) shall have a Specific Condition that the No. 4 Lime Kiln is the pollution control device for the Kamyr digester system.

16. The No. 4 Lime Kiln shall be tested for TRS and SO<sub>2</sub> emissions after the Kamyr digester system's TRS noncondensable gas handling system has been connected to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$100.00 (less than 25 TPY potential emissions) has already been received.

Issued this 18 day of April,  
1988

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtmann, Secretary

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

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

Permit Number: AC 45-141872  
Expiration Date: October 14, 1990  
County: Nassau  
Latitude/Longitude: 30° 40' 53"N  
81° 27' 26"W  
Project: Batch Digester 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 batch digester system and the construction/installation of a noncondensable gas (NCG) handling system to capture and deliver pollutant emissions to the new No. 4 Lime Kiln for incineration. The existing batch digester system consists of 7 batch digesters, 2 blow tanks, and a turpentine recovery system. A new hot water accumulator will be constructed to condense steam from the blow tanks. Also, a new turpentine recovery system will be constructed to replace the existing one. For PSD purposes, the maximum daily pulp production will be 1391 TPD ADP (tons per day of air dried pulp). 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 Batch Digester System 3-07-001-01

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

AC 45-141872

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. Mr. C. H. Fancy's letter dated January 22, 1988.
6. Mr. Paul J. Magnell's letter dated February 23, 1988, and received February 24, 1988.
7. Technical Evaluation and Preliminary Determination dated March 1, 1988.
8. Mr. Paul J. Magnell's letter dated March 10, 1988, and received on March 15, 1988.
9. VE-45-313 dated/signed March 15, 1988.
10. Mr. Roger P. Hagan's letter dated March 25, 1988, and received on April 1, 1988.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141872  
Expiration Date: October 14, 1990

**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 45-141872  
Expiration Date: October 14, 1990

**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 45-141872  
Expiration Date: October 14, 1990

**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 45-141872

Expiration Date: October 14, 1990

**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 batch digester system's operating hours shall not exceed 8736 hours per year.

2. 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.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141872  
Expiration Date: October 14, 1990

**SPECIFIC CONDITIONS:**

3. The batch digester system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 4 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 8 ppmvd corrected to 10% O<sub>2</sub>, in accordance with 40 CFR 60.283(a)(1).

4. The batch digester system is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

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

6. The batch digester system is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

7. The batch digester system is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.

8. Compliance tests using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be conducted if the permittee does not incinerate the TRS gases from the batch digester system in the No. 4 Lime Kiln.

9. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

10. Pursuant to VE-45-313, the batch digester system shall be in final compliance by June 1, 1990, and the permittee shall provide proof of final compliance to the DER's Northeast District office by July 16, 1990.

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

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141872  
Expiration Date: October 14, 1990

**SPECIFIC CONDITIONS:**

12. The DER's Northeast District office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the NE District office within 45 days of test completion.

13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results, the Certificate of Completion, and the contingency plan, 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. Operation beyond the construction permit expiration date requires a valid permit to operate. (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)


14. 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 DER's Bureau of Air Quality Management office and Northeast District office.

15. The No. 4 Lime Kiln construction/operating permit(s) shall have a Specific Condition that the No. 4 Lime Kiln is the pollution control device for the batch digester system.

16. The No. 4 Lime Kiln shall be tested for TRS and SO<sub>2</sub> emissions after the batch digester system's TRS noncondensable gas handling system has been connected to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$100.00 (less than 25 TPY potential emissions) has already been received.

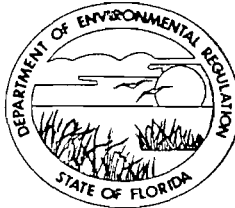
Issued this 13 day of April,  
1988

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtmann, Secretary

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

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

Permit Number: AC 45-141873  
Expiration Date: October 14, 1990  
County: Nassau  
Latitude/Longitude: 30° 40' 53"N  
81° 27' 26"W  
Project: No. 5 Multiple Effect  
Evaporator 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 No. 5 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s) and concentrator(s). A new hot well will replace the existing hot well. A noncondensable gas handling system will be constructed to collect and transport all of the pollutant emissions from the No. 5 MEE System to the No. 4 Lime Kiln for incineration. The project will occur at the permittee's existing kraft pulp mill. 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 No. 5 MEE System 3-07-001-03

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

AC 45-141873

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. Mr. C. H. Fancy's letter dated January 22, 1988.
6. Mr. Paul J. Magnell's letter dated February 23, 1988, and received February 24, 1988.
7. Technical Evaluation and Preliminary Determination dated March 1, 1988.
8. Mr. Paul J. Magnell's letter dated March 10, 1988, and received March 15, 1988.
9. Bruce Mitchell's Interoffice Memorandum dated March 15, 1988.
10. VE-45-313 dated/signed March 15, 1988.
11. Mr. Roger P. Hagan's letter dated March 25, 1988, and received April 1, 1988.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141873  
Expiration Date: October 14, 1990

**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 45-141873  
Expiration Date: October 14, 1990

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 45-141873  
Expiration Date: October 14, 1990

**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 45-141873  
Expiration Date: October 14, 1990

**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 maximum hours of operation of the No. 5 MEE system shall not exceed 8736 annually.
2. The maximum total process input rate of black liquor to the No. 5 MEE system shall not exceed 1,340,690 lbs/hr at 23% solids (equivalent to 308,359 lbs/hr of black liquor solids (BLS)).

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141873  
Expiration Date: October 14, 1990

SPECIFIC CONDITIONS:

3. The No. 5 MEE system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 4 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 8 ppmvd corrected to 10% O<sub>2</sub>, in accordance with 40 CFR 60.283(a)(1).

4. The No. 5 MEE system is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

5. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

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

7. In the event that a compliance test has to be performed on the No. 5 MEE system for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used.

8. Pursuant to VE-45-313, the No. 5 MEE system shall be in final compliance by June 1, 1990, and the permittee shall provide proof of final compliance to the DER's Northeast District office by July 16, 1990.

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

10. The No. 5 MEE system is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

11. The No. 5 MEE System is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.

12. The DER's Northeast District office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the district office within 45 days of test completion.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141873  
Expiration Date: October 14, 1990

SPECIFIC CONDITIONS:

13. 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 Certificate of Completion, and the contingency plan, 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. Operation beyond the construction permit expiration date requires a valid permit. (FAC Rules 17-2 & 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)

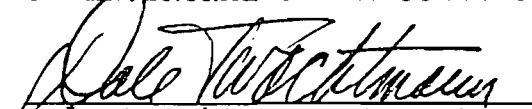
14. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to DER's BAQM office and the Northeast District office.

15. The No. 4 Lime Kiln construction/operating permit(s) shall have a Specific Condition that it is the pollution control device for the No. 5 MEE system.

16. The No. 4 Lime Kiln shall be tested for TRS and SO<sub>2</sub> emissions after the No. 5 MEE system's TRS noncondensable gas handling system has been connected to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$100.00 (less than 25 TPY potential emissions) has already been received.

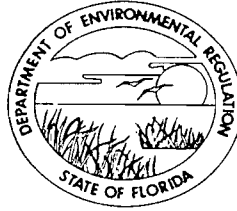
Issued this 18 day of April,  
1988.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtmann, Secretary

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

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: Permit Number: AC 45-141874  
Container Corporation of America 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)

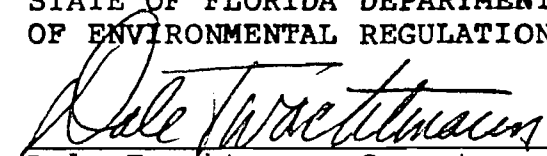
If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease. (FAC Rule 17-4)

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.

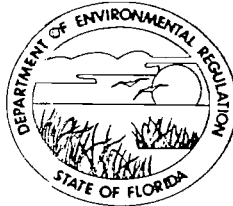
Issued this 18 day of April,  
1988

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtmann, Secretary

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

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: Permit Number: AC 45-141875  
Container Corporation of Expiration Date: September 24, 1989  
America

**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<sub>2</sub>S) 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.

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

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

Permit Number: AC 45-141877  
Expiration Date: March 27, 1991  
County: Nassau  
Latitude/Longitude: 30° 40' 53"N  
81° 27' 26"W  
Project: No. 4 Lime Kiln with an  
Electrostatic Precipitator

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 construction of a new 630 TPD lime kiln (No. 4), with an associated electrostatic precipitator (ESP) control system, to replace the existing Nos. 2 and 3 Lime Kilns. The lime kiln will be heated using No. 6 fuel oil with a maximum sulfur content of 3.0%, by weight. 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

A. Pulp and Paper Industry

Major Group 26: Sulfate (Kraft) Pulping  
o Lime Kiln 3-07-001-06

B. Mineral Products

Major Group 32: Lime Manufacture  
o Calcining-Rotary Lime Kiln 3-05-016-04

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

AC 45-141877

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. Mr. C. H. Fancy's letter dated January 22, 1988.
6. Mr. Paul J. Magnell's letter dated February 23, 1988, and received February 24, 1988.
7. Technical Evaluation and Preliminary Determination dated March 1, 1988.
8. Mr. Paul J. Magnell's letter dated March 10, 1988, and received March 15, 1988.
9. Bruce Mitchell's Interoffice Memorandum dated March 15, 1988.
10. Mr. Roger P. Hagan's letter dated March 25, 1988, and received April 1, 1988.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141877  
Expiration Date: March 27, 1991

**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 45-141877  
Expiration Date: March 27, 1991

**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 45-141877  
Expiration Date: March 27, 1991

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)
- (x) Compliance with New Source Performance Standards

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

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

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141877  
Expiration Date: March 27, 1991

**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 Lime Kiln operating hours shall not exceed 8736 hours annually.
2. The maximum lime production rate shall not exceed 630 TPD (tons/day), corresponding to a process input rate of 93,749 lbs/hr of lime mud.
3. The No. 6 fuel oil firing rate shall not exceed 1176.8 gals/hr (170.63 MMBtu/hr heat input). The sulfur content of the fuel oil shall not exceed 3.0%, by weight.



PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141877  
Expiration Date: March 27, 1991

SPECIFIC CONDITIONS:

4. In accordance with 40 CFR 60.282(a)(3), the particulate matter (PM) emissions from the No. 4 Lime Kiln and its associated ESP control system shall not exceed 0.30 g/dscfm (0.13 gr/dscf; 43.5 lbs/hr, 190.0 TPY) corrected to 10% oxygen when liquid fossil fuel is burned.

5. In accordance with 40 CFR 60.283(a)(5), the total reduced sulfur (TRS) from the No. 4 Lime Kiln and its associated ESP control system shall not exceed 8 ppm by volume on a dry basis, corrected to 10% oxygen (2.63 lbs/hr, 11.5 TPY).

6. For inventory and future PSD review purposes:

Pollutant	Emissions	Basis
SO <sub>2</sub>	26.8 lbs/hr, 117.1 TPY	0.2 lb/ton ADP
NO <sub>x</sub>	819.9 TPY	1.1 lb/10 <sup>6</sup> Btu
VOC	44.7 TPY	0.06 lb/10 <sup>6</sup> Btu
CO	29.8 TPY	0.04 lb/10 <sup>6</sup> Btu
PM <sub>10</sub>	168.2 TPY	88.5% of PM (TSP)

Note: Pollutant emissions are based on 8736 hrs/yr (PSD permit restriction)

7. Visible emissions shall be limited to less than 20% opacity, in accordance with Florida Administrative Code (FAC) Rule 17-2.610(2).

8. The noncondensable gas (NCG) handling system associated with the batch digester system, the Kamyr digester system, and the No. 5 Multiple Effect Evaporator System, shall be connected to the No. 4 Lime Kiln to incinerate the gases.

9. Monitoring of emissions and operations shall be in accordance with 40 CFR 60.284(a), (c), (d) and (e).

10. The No. 4 Lime Kiln is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141877  
Expiration Date: March 27, 1991

**SPECIFIC CONDITIONS:**

11. Initial and annual compliance tests shall be conducted in accordance with FAC Rule 17-2.700, 40 CFR 60.285, and 40 CFR 60, Appendix A:

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

12. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

13. Pursuant to VE-45-3113, the Kamyrd digester system, batch digester system and No. 5 Multiple Effect Evaporator system, shall be in final compliance by June 1, 1990, and the permittee shall provide proof of final compliance to the DER's Northeast District office by July 16, 1990.

14. This project shall comply with all the applicable requirements of FAC Rules 17-2 and 17-4, and 40 CFR 60, Subpart BB, Standards of Performance for Kraft Pulp Mills.

15. The DER's Northeast District office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the NE District office within 45 days of the test completion.

16. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction and achieve final compliance on schedule, the DER's Bureau of Air Quality Management (BAQM) office and Northeast District office must be notified in writing 60 days prior to the final compliance date of the construction permit and the permittee shall submit appropriate information pursuant to FAC Rule 17-2.960(1)(e).

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141877  
Expiration Date: March 27, 1991

**SPECIFIC CONDITIONS:**

17. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and 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. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rules 17-2 and 17-4)

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct, which can take up to 90 days to process a complete application. (FAC Rule 17-4)

18. 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 BAQM office and Northeast District office.

19. The No. 4 Lime Kiln shall be tested for TRS and SO<sub>2</sub> emissions before and after connecting the TRS NCG handling system to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The TRS emissions tests, using EPA Methods 3 and 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to demonstrate the destruction efficiency of the pollutant. The SO<sub>2</sub> emissions tests, using EPA Method 6 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to establish the overall removal efficiency of the No. 4 Lime Kiln. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee(s) pursuant to FAC Rule 17-4 for the NCG handling system's associated sources (see Specific Condition # 8).

20. Objectionable odors shall not be allowed off of the plant property pursuant to FAC Rule 17-2.620(2).

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141877  
Expiration Date: March 27, 1991

**SPECIFIC CONDITIONS:**

21. The No. 2 and No. 3 lime kilns shall be shut down and their operating permits surrendered to the DER's Northeast District office no later than the expiration date of this permit.

22. The No. 4 Lime Kiln shall be in final compliance by November 12, 1990, in accordance with FAC Rule 17-2.960(1)(d)3.d.(ii), and the permittee shall provide proof of final compliance to the DER's Northeast District office by December 27, 1990.

23.. Reasonable precautions shall be taken to control emissions of unconfined PM pursuant to FAC Rule 17-2.610(3).

24. The No. 4 Lime Kiln is subject to the provisions of 40 CFR 60, Subpart A, General Provisions.

Issued this 18 day of April,  
1988

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtman, Secretary

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

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

Permit Number: AC 45-141878  
Expiration Date: March 27, 1991  
County: Nassau  
Latitude/Longitude: 30° 40' 53"N  
81° 27' 26"W  
Project: Lime Slakers/Lime Bins  
& Associated Control Sys.

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 construction of two new lime slakers, to replace the existing lime slakers, and three new causticizers to serve each lime slaker (the two slaker systems will operate in parallel). Two new lime storage bins will be constructed to replace the existing bins, which will support the new No. 4 Lime Kiln and the slaker systems. The No. 1 Lime Bin will receive lime from the No. 4 Lime Kiln by bucket elevator and by truck using a pneumatic conveyor. The No. 2 Lime Bin will receive purchased lime only by rail or truck. The lime slaker systems will have scrubber control systems to control pollutant emissions. The lime storage bins will have baghouse filter control systems to control pollutant emissions. 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:

- A. Pulp & Paper Industry
  - Major Group 26: Sulfate (Kraft) Pulping
    - o Lime Slakers (2) 3-07-001-99
    - o Lime Bins (2) 3-07-001-99
- B. Mineral Products
  - Major Group 32: Lime Manufacture
    - o Raw Material Transfer & Handling 3-05-016-07
    - o Raw Material Unloading 3-05-016-08
    - o Lime Silos 3-05-016-13

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

ATTACHMENTS

AC 45-141878

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.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141878  
Expiration Date: March 27, 1991

**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 45-141878  
Expiration Date: March 27, 1991

**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 45-141878  
Expiration Date: March 27, 1991

**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 45-141878  
Expiration Date: March 27, 1991

**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 Lime Slaker systems may operate continuously (i.e. 8760 hours per year).
2. The maximum lime feed rate to each slaker shall not exceed 380 tons per day, which reflects 45.8 tons per hour green liquor solids (dry) feed rate.
3. The maximum process input rate to Nos. 1 and 2 Lime Bins shall not exceed 52,500 lbs/hr and 88,000 lbs/hr respectively.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141878  
Expiration Date: March 27, 1991

SPECIFIC CONDITIONS:

4. Particulate matter (PM) emissions from each slaker system, which includes the lime slaker and the associated causticizers, shall not exceed 1.0 lb/hr or 4.4 TPY. Visible emissions (VE) shall be limited to less than 20% opacity in accordance with Florida Administrative Code (FAC) Rule 17-2.610(2).

5. Each baghouse control system associated with the lime storage bins (Nos. 1 & 2) shall not exhibit any VE (5% opacity) pursuant to FAC Rule 17-2.700(3)(d). Compliance shall be demonstrated using EPA Method 9 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

6. Failure to comply with Specific Condition No. 5 will necessitate the requirement to perform a mass emissions test for PM using EPA Methods 1, 2, 3, and 5, pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A. PM emissions shall not exceed 0.03 gr/dscf (Lime Bin #1: 1.2 lbs/hr, 5.3 TPY; Lime Bin #2: 0.74 lb/hr, 3.2 TPY).

7. Initial and annual compliance test for the slaker systems shall be conducted using EPA Method 5 or 17, Determination of Particulate Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

8. The lime handling system (i.e., conveyors, shutes, elevators, storage bins, etc.) shall be enclosed to minimize PM emissions pursuant to FAC Rule 17-2.610(3).

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

10. The slaker systems and lime storage bins are subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

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 DER's Northeast District office within 45 days of test completion.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141878  
Expiration Date: March 27, 1991

**SPECIFIC CONDITIONS:**

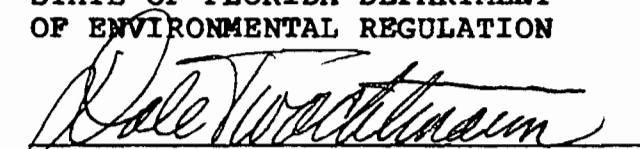
12. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results and the Certificate of Completion, to the DER's Northeast 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.

Issued this 13 day of April,  
1988

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtmann, Secretary

ATTACHMENT 8

3.15.88  
Fernanda Beach, FL

JSC/CCA

JEFFERSON SMURFIT CORPORATION &amp; CONTAINER CORPORATION OF AMERICA

Mill Division

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

REC

March 10, 1988

MAR 10 1988

DER-BAQM

Mr. Bill Thomas  
Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Thomas:

The following comments are in response to the Technical Evaluation and Preliminary Determination and draft permits which we received on March 1, 1988. These draft permits are for the construction of equipment to bring various sources in this mill into compliance with the TRS regulations.

Comments on Permit Nos. AC 45-141871, AC 45-141872, AC 45-141873

Our first comment is directed at the draft permits for the Batch Digesters, the Kamyrdigester, and the No. 5 MEE. These are the three sources from which the NCG will be collected and incinerated in the new No. 4 lime kiln. All three of these draft permits include a specific condition (Specific Condition No. 2 in each case) which limits the production rate or process thru-put rate for each system. In our recent meeting Mr. Steve Smallwood and Mr. Bruce Mitchell spent some time discussing the Department's rationale for these production limitations. While we understand Mr. Smallwood's concerns over adequately describing and controlling the sources so as to ensure compliance with the rule, we do not feel that specific production limitations are necessary or justified.

As the Technical Evaluation and the draft permits state, the incineration device for these three sources will be the No. 4 lime kiln. As such, the NSPS limit of 8 ppm TRS emissions applies to that kiln whether NCG is being incinerated or not. Thus the effective emission limit and potential emissions from those sources is zero.

We recognize the need on the Department's part to use a peak production number in determination of potential and uncontrolled emissions. However, as stated above, since the incineration device in this case is itself a controlled production device, the effective potential emissions from these sources is zero. Therefore, we would like to propose the following alternative language for Specific Condition 2 in each of the three referenced permits:

- "2. For purposes of PSD and other emissions calculations, the peak production rate of the \_\_\_\_\_ is ...".

We would also like to point out that Specific condition 14 of each permit states that any change in operation which constitutes a Modification as defined by FAC 17-2.100 (118) must be submitted to DER for approval. Under this definition, any increase in production rate or change in control device which would result in increased emissions must have prior approval from the Department.

We feel that the combination of the proposed language and the limitations of Specific Contion 14 are more than adequate to protect the interests of the Department, the general public and Container Corporation of America.

Comment on Permit No. 45-A141875

This proposed permit is for the No. 4 Smelt Dissolving Tank. This source has been previously permitted, and as such requires only a modification to the existing permit No. A0 45-107514. We feel that the construction permit and subsequent operating permit modification should address only TRS emissions and the construction of the control device only as it pertains to TRS. The existing limitations on particulate emissions, etc. should not be changed or affected by the installation of the new control device providing the new device meets or exceeds those limits.

Therefore, we request the following changes in the referenced proposed permit:

Specific Conditions Nos. 3., 4., 6.a), and 6.b) should be deleted from the proposed construction permit.

Specific Condition No. 12. should be changed to reflect the fact that the existing Operating Permit will be modified and a new Operating Permit is not required.

Comments on AC 45-141877

The Technical Evaluation states that the new No. 4 lime kiln will be the only source permitted to burn fuel oil with a sulfur content limit of 3.0%. The proposed permit then states in Specific Condition 22 that a separate fuel oil storage tank be provided exclusively for the No. 4 kiln. The existing permits for our Nos. 4 and 5 Power Boilers, A0 45-114419 and A0 45-114418 respectively, show that both of sources are permitted to burn No. 6 fuel oil at 3.0% or less sulfur content also. Only our No. 7 Power Boiler is permitted to burn No. 6 fuel oil at less than 2.5% sulfur content. This boiler does not have a dedicated fuel oil storage tank at this time, thus we are presently using only No. 6 fuel oil with less than 2.5% sulfur content. Our regular certifications of ASTM fuel oil analysis which we submit to the Department show that our No. 6 fuel oil has always met this requirement. Future plans allow for the possibility of segregating fuel for No. 7 Power Boiler from that used in the other sources. As a result, we feel that it is unnecessary to require that a separate fuel oil storage tank be provided for this source, and we request that Specific Condition No. 22 be deleted from this permit.

Page 3  
March 10, 1988

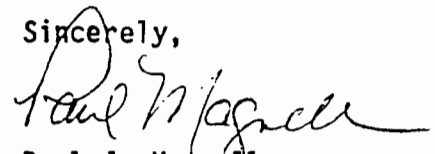
As I explained in my telephone conversation with Mr. Bruce Mitchell, there appear to be two errors in the Technical Evaluation and draft permit pertaining to this source. First, we had requested a particulate emission rate of 43.5 lb/hr from the lime kiln. This was the number used in the calculations of contemporaneous emissions increases for PSD increment assessment in the application. However, the number appears as 45.3 lb/hr in the technical brief and this number is carried through the draft permit as well. As mentioned, the correct emission rate should be 43.5 lb/hr PM. The second error appears in Specific Condition 13 of the draft permit. The date for final compliance is stated as May 12, 1989. However, since this permit is for replacement of the existing kilns, the compliance date should be November 12, 1990. This date is also independent on granting of the Variance, since no variance was requested for the lime kiln.

Finally, in Specific Condition 19, lines 6 and 7 use the words "complete destruction of the pollutant" in referring to incineration of the TRS in the lime kiln. In fact, since the lime kiln itself will have a TRS limit of 8 ppm, we do not feel we are required to show "complete destruction" of the TRS from the collected sources, only that the lime kiln itself, with the TRS being incinerated in it, meets the 8 ppm limit. A true determination of "complete destruction" of the TRS gasses being incinerated would be very costly due to the very low level of TRS emission from the kiln and is neither necessary nor justified. We would like to request that this wording be changed to reflect that the TRS test need only show that the lime kiln meets its TRS limit with the NCG being incinerated in it.

Container Corporation of America has appreciated the prompt and cooperative attention with which the Department has treated these permit applications. We would like to have the opportunity to meet with your staff to discuss these suggestions and comments. Since the 14 day period for formal and informal response to the draft permits is approaching its end, we are arranging under separate cover to petition for an extension of that period to ensure that we have the opportunity to meet and to resolve any issues which may remain on these important construction permits.

Please direct any further questions or comments to Roger Hagan at (904) 261-5551.

Sincerely,



Paul J. Magne  
General Manager

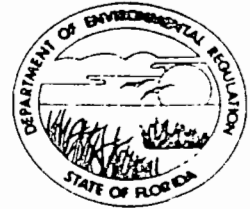
PJM/js

cc: E. E. Frey - FDER, Jax

bcc: R. P. Hagan  
R. L. Caffo  
C. L. Hardy  
R. C. Cobb - Clayton Legal  
R. H. Williams - Jax Central  
Bruce Mitchell - FDER, Tallahassee  
Steve Smallwood - " "



ATTACHMENT 9



# Interoffice Memorandum

For Routing To Other Than The Addressee

To _____	Location _____
To _____	Location _____
To _____	Location _____
From _____	Date _____

TO: Main Files  
Container Corporation of America: AC 45-141873  
AC 45-141874  
AC 45-141877

FROM: Bruce Mitchell *BM*

DATE: March 15, 1988

SUBJECT: Comments on the Technical Evaluation and Preliminary Determination/Draft Construction Permits

1. AC 45-141873: No. 5 Multiple Effect Evaporator System  
The Rule citing in Specific Condition No. 3 will be changed:  
From: FAC Rule 17-2.400(4)(c)1.b.  
To: FAC Rule 17-2.600(4)(c)1.b.
2. AC 45-141874: Tall Oil Plant  
The Rule citing in Specific Condition No. 8 will be changed:  
From: FAC Rule 17-2.400(4)(c)2.b.  
To: FAC Rule 17-2.600(4)(c)2.b.
3. AC 45-141877: No. 4 Lime Kiln
  - a. The requirement of Specific Condition No. 21 is in disagreement with the signed Variance, OGC. Case No. VE-45-313. The variance and the draft construction permit requires that the operating permits of the Nos. 2 and 3 Lime Kilns to be surrendered by November 12, 1990, and March 27, 1991, respectively. Therefore, in order to maintain consistency with applicable documents, the following change will be made:  
From: The No. 2 and 3 lime kilns shall be shutdown and their operating permits shall be surrendered to the DER's Northeast District office no later than the expiration date of this permit.  
To: The Nos. 2 and 3 Lime Kilns shall be shutdown and their operating permits shall be surrendered to the DER's Northeast District office no later than November 12, 1990.
  - b. A requirement for the final compliance date shall be added:  
To: The No. 4 Lime Kiln shall be in final compliance by November 12, 1990, in accordance with FAC Rule 17-2.960(1)(d)3.b.(ii).

ATTACHMENT 10

Intent to Issue

Mr. Paul J. Magnell  
General Manager  
Container Corporation of America  
Post Office Box 2000  
North Eighth Street  
Fernandina Beach, Florida 32034

Dear Mr. Magnell:

Container Corporation of America  
Petition for Variance  
File No. VE-45-313  
Nassau County

On March 19, 1987, the Department received the above referenced Petition for Variance pursuant to Rule 17-2.960(1)(g)1., Florida Administrative Code (FAC), and Section 403.201, Florida Statutes (FS). Container Corporation of America requested a variance to June 1, 1990, at which time final compliance will have to be demonstrated for the existing No. 5 multiple effect evaporator (MEE) system, batch digester system and Kamyrdigester system.

The Department has reviewed the Petition for Variance and hereby gives notice of its intent to issue to Container Corporation of America (CCA) a variance based on the following findings:

- 1) Part of CCA's current modernization program and proposed "TRS Conceptual Compliance Plan" is the installation of a new No. 4 lime kiln, replacing the existing Nos. 2 and 3 lime kilns.
- 2) Another part of the proposed "TRS Conceptual Compliance Plan" is the installation of a TRS noncondensable gas (NCG) handling system for capturing and transporting TRS emissions from the existing No. 5 MEE system, batch digester system and Kamyrdigester system, to a combustion source. Without a variance, final compliance for these existing sources will

have to be demonstrated by May 12, 1989, pursuant to Rule 17-2.960(1)(d), FAC.

- 3) The combustion source selected by CCA to treat/combust the TRS emissions collected by the NCG system is the proposed new No. 4 lime kiln. The proposed new No. 4 lime kiln cannot be constructed and in compliance by May 12, 1989 - the final compliance date for the existing No. 5 MEE system, batch digester system and Kamyr digester system; therefore, the company has requested a variance for the existing No. 5 MEE system, batch digester system and Kamyr digester system, to June 1, 1990, to allow for completion of the construction and start-up of the proposed new No. 4 lime kiln (which is required to be in final compliance by November 12, 1990, pursuant to Rule 17-2.960(1)(d)3.b., FAC).
- 4) Container Corporation of America, therefore, applied to the Department for a variance under Chapter 403.201(1)(b), FS, pursuant to Rule 17-2.960(1)(g)1., FAC. Following a completeness review, supplemental information was requested and received, thus completing the variance application package.
- 5) In order to avoid redundancy and improve cost-effectiveness, CCA does not propose to install and operate a temporary or secondary TRS NCG control system for the existing No. 5 MEE system, batch digester system and Kamyr digester system, because it would be disconnected and dismantled after the proposed new No. 4 lime kiln and TRS NCG system are connected (by June 1, 1990).

- 6) CCA does not want to escalate the final compliance date of the proposed new No. 4 lime kiln to that of the existing sources, already identified for which a variance is sought, because of the time constraints associated with the design, engineering, delivery, construction, and initial compliance testing of the proposed new No. 4 lime kiln (estimated to take two years). Also, CCA wants to spread the total cost of the new No. 4 lime kiln and the TRS NCG system over a multi-year time period instead of a single year.
  
- 7) Over the last four years, CCA asserts that it has spent over \$100 million on upgrading and modernization, trying to make the mill more efficient and profitable. Besides the \$26 million committed to the proposed new No. 4 lime kiln and TRS NCG system, CCA intends to commit approximately \$2.7 million to upgrade and maintain the present mill in such a way as to minimize the facility's TRS emissions until final compliance is achieved (see Paul J. Magnell's letters dated November 12 and December 11, 1987).
  
- 8) Nassau County has an estimated population of 41,000. CCA employs greater than 4% of the employed labor force. In 1986, CCA paid over \$2.8 million in property taxes, which is over 22% of the total property taxes collected by the County. CCA's wages are part of the reason that Nassau County is one of the top 4 counties in the State in per capita income.
  
- 9) The construction of the proposed new No. 4 lime kiln will result in the retirement of two existing lime kilns (Nos. 2 and 3). The proposed new No. 4 lime kiln will be subject to

the emission limiting standards of the federal New Source Performance Standards (NSPS), 40 CFR 60, Subpart BB, adopted by reference in Rule 17-2.660, FAC. Consequently, the proposed new No. 4 lime kiln, as opposed to the two existing lime kilns, will be a more efficient and reliable combustion source for handling the facility's TRS emissions. Also, the particulate matter emissions limiting standard(s) for the proposed new No. 4 lime kiln will be more stringent than the current standard(s) for the existing Nos. 2 and 3 lime kilns.

10) The control system for the proposed new No. 4 lime kiln is an electrostatic precipitator, which is an excellent control device for particulate matter. By eliminating the existing wet scrubber systems on the existing lime kilns, which use contaminated condensate for their scrubbing medium, an additional reduction in TRS emissions will be effected (past test results show a large range of TRS emissions from both systems). Therefore, eliminating two existing air pollution sources for a tightly regulated, more efficient source is more desirable from an environmental and regulatory perspective.

11) Pursuant to Rule 17-2.960(1)(e), FAC, a mill is allowed up to two years extension under a variance. CCA requested from May 12, 1989 to June 1, 1990, under the Petition for Variance, for additional time to demonstrate final compliance for the existing No. 5 MEE system, batch digester system and Kamyr digester system. Approval of the Petition for Variance will result in requiring final compliance of these sources to be demonstrated by June 1, 1990.

The Department hereby gives notice of its intent to issue a variance (VE-45-313) to Container Corporation of America for the No. 5 MEE system, batch digester system and Kamyr digester system, subject to the following conditions:

- 1) The existing No. 5 MEE system, batch digester system and Kamyr digester system, shall be in final compliance with Rule 17-2, FAC, by June 1, 1990.
- 2) By November 12, 1990, an initial compliance test in accordance with 40 CFR 60.8, Subpart A, shall be performed on the proposed new No. 4 lime kiln with the TRS NCG system connected to it and with all of the TRS NCG emission sources, which is to include the No. 6 MEE system, in operation (90-100% of permitted capacities).
- 3) A construction permit application with the appropriate fee shall be submitted by CCA to the Department by May 12, 1988, for the proposed new No. 4 lime kiln pursuant to Rule 17-2.960(1)(d)3.b., FAC.
- 4) CCA shall upgrade, where cost effective and practical, and maintain the present facility in such a manner as to minimize interim TRS emissions. Pursuant to Rule 17-2.600(4)(c)1.c., FAC, a maintenance and malfunction contingency plan shall be submitted to the Department's Northeast District office and the Bureau of Air Quality Management office within ninety days after the effective date of this variance, outlining the interim maintenance



program for minimizing TRS emissions that will be in effect prior to achieving final compliance.

- 5) After compliance has been demonstrated on the proposed new No. 4 lime kiln, CCA shall shut down the existing Nos. 2 and 3 lime kilns and surrender any active Departmental permits for these sources to the Department, but no later than November 12, 1990.
- 6) The TRS emissions from the No. 6 MEE system shall be diverted to the TRS NCG system by June 1, 1990.
- 7) CCA agreed to expend approximately \$2.7 million to minimize TRS emissions from the present facility during the interim period and prior to demonstrating final compliance on the sources for which this variance is sought, unless a greater amount is required to maintain the present facility and minimize TRS emissions during this period (see Paul J. Magnell's letters dated November 12 and December 11, 1987). Documentation shall be required in the form of a Quarterly Report and the first report shall be due March 1, 1988.
- 8) The Quarterly Report shall be submitted to the Department's Northeast District office describing the status of the facility's progress in complying with the terms of this variance. The report shall also describe any equipment upgrades and interim maintenance procedures implemented, and their associated costs, to minimize TRS emissions from the present facility.
- 9) The Department shall be notified in writing prior to any deviation(s) from the terms contained in this variance.

10) This variance is null and void if CCA alters its strategy to comply with the TRS Rule(s) contained in Rule 17-2, FAC, by using an existing source to treat/combust the facility's TRS emissions instead of the proposed new No. 4 lime kiln. Consequently, the mill's existing sources, for which this variance is sought and subject to the TRS Rule, will have to be in final compliance in accordance with Rule 17-2.960, FAC, if the proposed new No. 4 lime kiln is not constructed to treat/combust the facility's TRS emissions as reflected by their application for this variance.

11) The following attachments are incorporated:

1. Mr. Paul J. Magnell's letter dated January 30, 1987, and received February 12, 1987.
2. Mr. C.H. Fancy's letter dated March 12, 1987.
3. Mr. Paul J. Magnell's letter dated March 19, 1987, and received March 25, 1987.
4. Mr. Steve Smallwood's letter dated July 21, 1987.
5. Mr. Paul J. Magnell's letter dated August 19, 1987, and received August 25, 1987.
6. Mr. Paul J. Magnell's letter dated October 13, 1987, and received October 21, 1987.
7. Mr. Paul J. Magnell's letter dated November 12, 1987, and received November 16, 1987.
8. Mr. Paul J. Magnell's letter dated December 11, 1987, and received December 11, 1987 (hand delivered).
9. Public Notice - Fernandina Beach News-Leader: issue of February 28, 1988.
10. Public Notice - Florida Administrative Weekly: issue of February 29, 1988.
11. March 3, 1988 Public Hearing Agenda.
12. March 3, 1988 Public Hearing Attendee List.
13. March 3, 1988 Public Hearing Minutes.
14. Mr. Bruce P. Miller's letter dated February 28, 1988, and received March 4, 1988.

Any administrative relief approved by the Department must also be approved by the Regional Administrator of Region IV, United States Environmental Protection Agency (EPA). The Department will coordinate with the Atlanta office of the EPA in this regard to the maximum extent possible.

Pursuant to Rules 17-103.100 and 17-103.150, FAC, the petitioner shall publish at his expense one time only the attached legal notice in a newspaper of general circulation in the area affected by the proposed project. Proof of publication shall be in the form of an affidavit of publication submitted to the Office of the Director of the Division of Environmental Permitting, Department of Environmental Regulation. The Department will place the public notice in the Florida Administrative Weekly.

This Intent to Issue shall be placed before the Secretary for final action, unless an appropriate petition for a hearing pursuant to the provision of Section 120.57, FS, is filed within fourteen (14) days of publication of the public notice (copy attached) required pursuant to Rule 17-103.150, FAC. Should anyone wish to dispute a material fact or object to a condition of this proposed intent, a petition for a formal hearing shall be filed in accordance with the provisions of Section 120.57(1), FS. The petition must comply with the requirements of Rules 17-103.155 and 28-5.201, FAC (copies attached), and be filed pursuant to Rule 17-103.155(1), FAC, in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to file a petition within fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, FS.

In the event a formal hearing is conducted pursuant to Section 120.57(1), FS, all parties shall have an opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witnesses and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exceptions to any order of the hearing officer's recommended order, and to be represented by counsel. If an informal hearing is requested, pursuant to Section 120.57(2), FS, the agency, in accordance with its rules of procedure, will provide affected persons or parties or their counsel an opportunity at a convenient time and place, to present to the agency or hearing officer, written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction.

The administrative hearing process is designed to formulate agency action. Accordingly, if a petition is filed, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition, may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207, FAC, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, FS.

If the Department does not receive a petition for hearing within the time allowed by this letter and does receive proof of public notice from the petitioner, a final order will be issued.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

 15 March 98  
Dale Twachtmann Date

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

Copies furnished to:

S. Smallwood, DER  
H. Rhodes, DER  
R. Armstrong, DER  
E. Frey, DER  
C. Fancy, DER  
J. Brown, DER  
M. Zilberberg, Esq., DER  
B. Pittman, Esq., DER  
B. Miller, EPA  
M. Flores, NPS  
B. Williams, JSC  
R. Hagan, CCA

ATTACHMENT 11

3.29.88  
Jurnalana Beach, FL



**JSC/CCA**

JEFFERSON SMURFIT CORPORATION & CONTAINER CORPORATION OF AMERICA

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

**RECEIVED**

**APR 1 1988**

**DER-BAQM**

CERTIFIED MAIL

March 25, 1988

Mr. Bruce Mitchell  
Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Mitchell:

We would like to express our appreciation for the opportunity to meet with the Department on March 24 to discuss Container Corporation of America's comments on the draft construction permits for the TRS compliance project. The following will summarize our understanding of the conclusions reached during that meeting and the actions agreed upon at that time.

Permit No. AC 45-141871

It was agreed at the meeting to change the wording of Specific Condition No. 2 of the referenced permit for the Kamyr digester system to read as follows:

- "2. For testing purposes, the peak production rate of the Kamyr digester system shall not exceed 85 tons of air dried pulp per hour based on a 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 TADP/D (tons air dried pulp per day)."

Permit No. AC 45-141872

Similarly, it was agreed that the wording of Specific Condition No. 2 of the referenced batch digester system be changed to the following:

- "2. For testing purposes, the peak production rate of the batch digester system shall not exceed 101.5 tons of air dried pulp per hour based on a utilization rate of 392,305 lbs/hr wood chips (dry) and 819,918 lbs/hr black/white liquor. For PSD purposes, the maximum production rate shall not exceed 1391 TADP/D (tons air dried pulp per day)."

Permit No. AC 45-141873

Upon further review we believe that Specific Condition No. 2 of the referenced permit for the No. 5 MEE should stand as written.

Mr. Bruce Mitchell  
Page 2  
March 25, 1988

Permit No. AC 45-141875

We understand that the Department feels that all applicable pollutants should be addressed in the TRS construction permits. For that reason, the current limit on particulate matter is included in the referenced permit for the No. 4 smelt dissolving tank. However, we disagree as to the applicability of a Visible Emissions (VE) requirement for this type of source. The nature of the process and the control system (wet scrubbing) render it impossible to determine an objective VE. In the interest of expediting the construction permitting process, we have agreed that the general VE limit be left in the construction permit until the DER addresses the inapplicability of this provision to this source through the rule-making process.

Permit No. AC 45-141877

Several changes were agreed upon for the referenced permit for construction of a new No. 4 lime kiln. The changes proposed in your memo of March 15 are acceptable as written. In addition, it was agreed that since the proposed No. 4 lime kiln is not the only source permitted to burn No. 6 fuel oil at 3% or less sulfur content, Specific Condition No. 22 will be deleted. It was also agreed to change the erroneous emission rate listed in the Technical Evaluation and in the draft permit to the correct rate of 43.5 lb/hr PM. Specific Condition No. 13 will be altered to clarify that it refers only to the compliance date of the sources for which the No. 4 kiln will be the control device, i.e. the Kamyrdigester, the batch digester, and the No. 5 MEE. Finally, it was agreed that the language in Specific Condition No. 19 lines 6 and 7 shall be changed from ..."used to verify complete destruction of the pollutant", to ..."used to demonstrate the destruction efficiency of the pollutant".

It is our understanding that these changes will be incorporated in the final permits. We wish to thank the Department for meeting with us to address some of our concerns with the draft permits. If you have any further questions, please contact me at (904) 261-5551.

Sincerely,



Roger P. Hagan  
Technical Director

RPH/js

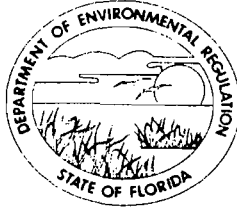
cc: Bill Thomas - FDER - Tallahassee  
E. E. Frey - FDER - Jacksonville

Copied: Bruce Mitchell }  
CHF/BT } 4.1.88 (M)  
Bradley Rowal }



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

March 1, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

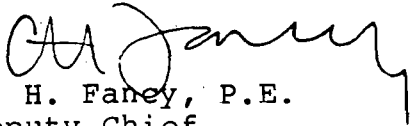
Mr. Paul J. Magnell  
General Manager  
Container Corporation of America  
North 8th Street  
Fernandina Beach, Florida 32034

Dear Mr. Magnell:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permits for Container Corporation of America to make several changes at its existing mill in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2 and to modernize the existing causticizing system. The changes include replacement of some existing equipment, addition of some new equipment, and the collection, transportation and incineration of the TRS gases. The TRS gases will be incinerated in a proposed new 630 TPD lime kiln (No. 4), which will replace the existing Nos. 2 and 3 Lime Kilns.

Please submit, in writing, any comments which you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

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

CHF/bm

Attachments

cc: B. Stewart, NE Dist.  
B. Williams, JSC  
R. Hagan, CCA  
D. Buff, P.E., KBN  
B. Pittman, Esq.

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Applications for Permits by:

Container Corporation of America	DER File No. AC 45-141871
North 8th Street	AC 45-141872
Fernandina Beach, Florida 32034	AC 45-141873
	AC 45-141874
	AC 45-141875
	AC 45-141877
	AC 45-141878

INTENT TO ISSUE

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

The applicant, Container Corporation of America (CCA), applied on November 12, 1987, to the Department of Environmental Regulation for permits to construct a new 630 TPD lime kiln (No. 4), which will replace the existing Nos. 2 and 3 Lime Kilns. CCA also proposes to make several changes at its existing facility in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code (FAC) Rule 17-2 and to modernize the existing causticizing system, which includes replacement of some existing equipment, addition of some new equipment, and the collection, transportation, and incineration of TRS noncondensable gases (NCG) from various sources. The TRS NCG gases will be incinerated in the proposed new No. 4 Lime Kiln. Control systems will be installed on TRS sources that will not be associated with the TRS NCG system, such as the Tall Oil Plant operations and the No. 4 Smelt Dissolving Tank. The location of the proposed modification and project will be at CCA's existing facility in Fernandina Beach, Nassau County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes (F.S.), and FAC Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits were needed for the proposed work.

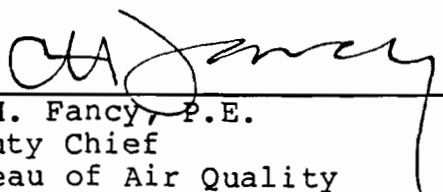
Pursuant to Section 403.815, F.S. and FAC Rule 17-103.150, you (the applicant) are required to publish at your own expense

the enclosed Notice of Proposed Agency Action on permit applications. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. Petitions must comply with the requirement of FAC Rules 17-103.155 and 28-5.201 (copy enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit applications. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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

Copies furnished to:

- B. Stewart, NE Dist.
- B. Williams, JSC
- R. Hagan, CCA
- D. Buff, P.E., KBN
- B. Pittman, Esq.

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

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
  - (a) The name and address of each agency affected and each agency's file or identification number, if known;
  - (b) The name and address of the petitioner or petitioners;
  - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
  - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
  - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
  - (f) A demand for the relief to which the petitioner deems himself entitled; and
  - (g) Such other information which the petitioner contends is material.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on Feb. 29, 1988.

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

Martha J. Wise Feb. 29, 1988  
Clerk Date

State of Florida  
Department of Environmental Regulation  
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Container Corporation of America (CCA), to construct/install a new 630 TPD lime kiln (No. 4), which will replace the existing Nos. 2 and 3 Lime Kilns. CCA also proposes to make several changes at its existing facility in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2 and to modernize the existing causticizing system, which includes replacement of some existing equipment, addition of some new equipment, and the collection, transportation, and incineration of TRS noncondensable gases (NCG) from various sources. The TRS NCG gases will be incinerated in the proposed new No. 4 Lime Kiln. Control systems will be installed on TRS sources that will not be associated with the TRS NCG system, such as the Tall Oil Plant operations and the No. 4 Smelt Dissolving Tank. The location of the proposed modification and project will be at CCA's existing facility in Fernandina Beach, Nassau County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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

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

Dept. of Environmental Regulation  
Northeast District Office  
3426 Bills Road  
Jacksonville, Florida 32207

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation  
and  
Preliminary Determination

Container Corporation of America  
Nassau County  
Fernandina Beach, Florida

State Construction Permits:

AC 45-141871  
45-141872  
45-141873  
45-141874  
45-141875  
45-141877  
45-141878

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

March 1, 1988



## I. Application

### A. Applicant

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

### B. Project Description and Location

Container Corporation of America (CCA) proposes several changes at its existing mill in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code (FAC) Rule 17-2. The changes include replacement of existing equipment, addition of new equipment, and the collection, transportation and incineration of noncondensable gases in a proposed new 630 TPD lime kiln (No. 4). Specifically, the following changes are proposed:

- o For the Kamyrdigester System, the liquor flash tank system and the turpentine recovery system will be replaced with new systems. Two new flash tanks will be installed adjacent to the digester to replace two existing flash tanks currently located across the mill. Noncondensable gases will be collected from the surge tank (blow tank), steaming vessel, flash tanks and turpentine system. A gas transportation system will be installed to deliver the collected gases to the No. 4 Lime Kiln for incineration.
- o The existing batch digesting system consists of seven batch digesters, two blow tanks and a turpentine recovery system. The existing turpentine condensing system will be replaced, and a new blow heat recovery system will be installed on the existing blow tanks. The noncondensable gases from both the turpentine and blow heat recovery systems will be collected and transported to the No. 4 Lime Kiln for incineration.
- o Noncondensable gases from the No. 5 Multiple Effect Evaporator (MEE) System will be collected and delivered to the No. 4 Lime Kiln for incineration. Vapors from the existing evaporators and concentrators will be routed to the existing surface condenser, to a new hot well, then to the noncondensable gas (NCG) handling system and the No. 4 Lime Kiln.
- o The No. 4 MEE System will be shutdown.

- o For the No. 4 Smelt Dissolving Tank (SDT), a new flooded elbow type venturi scrubber will be installed to provide control of particulate matter (PM) and TRS emissions and visible emissions (VE).
  
- o For the Tall Oil Plant, TRS emissions from the lignin tank, the saltcake tank and the acidulator will be collected and scrubbed in a new wet scrubber. The scrubber will be of the packed tower type and will utilize caustic soda as the scrubbing medium.
  
- o A new modern energy efficient lime kiln (No. 4) will be installed to replace the existing Nos. 2 and 3 Lime Kilns. The control system will be an electrostatic precipitator (ESP) to control PM emissions and VE.
  
- o For the causticizing and lime handling system, two new lime slakers, which will operate in parallel, will be constructed to replace the existing two lime slakers. Lime product from two new lime storage bins (Nos. 1 & 2) will be conveyed to the slakers in an enclosed system. Three new causticizers will be constructed to serve each new slaker. White liquor product from the new causticizers will be sent to the existing white liquor clarifiers. The exhaust vents on the new slaker and its associated causticizers (3) within each line will be ducted to a wet scrubber control system for control of PM emissions and VE.
  
- o Two new lime storage bins will be constructed to replace the existing lime storage bins and will support the No. 4 Lime Kiln. Lime Bin No. 1 will receive lime from the lime kiln via a bucket elevator and can also receive purchased lime by truck through pneumatic conveying. A baghouse filter control system will control PM emissions and VE from the lime storage bin as well as the bucket elevator and lime conveyor. Three air pickup points along the bucket elevator and lime conveyor will maintain a negative pressure on the lime conveying system. Lime Bin No. 2 will receive only purchased lime by rail or truck and will have a baghouse filter control system to control PM emissions and VE. Dust collected by each control system will be placed back into their respective lime bins.

The project will occur at the applicant's existing kraft pulp mill located in Nassau County, Florida. The UTM coordinates are Zone 17, 456.2 km East and 3394.2 km North.

The Standard Industrial Codes are:

1. No. 2621 - Paper Mills
2. No. 3274 - Lime

The Standard Classification Codes are:

1. Pulp and Paper Industry

Major Group 26: Sulfate (Kraft) Pulping

o Kamyrdigester System	3-07-001-01	(tons ADUP)
o Batch Digester System	3-07-001-01	(tons ADUP)
o No. 5 MEE System	3-07-001-03	(tons ADUP)
o No. 4 SDT	3-07-001-05	(tons ADUP)
o Tall Oil Plant	3-07-001-99	(tons ADUP)
o No.4 Lime Kiln	3-07-001-06	(tons ADUP)
o Lime Slakers (2)	3-07-001-99	(tons ADUP)

2. Mineral Products

Major Group 32: Lime Manufacture

o Calcining-Rotary Lime Kiln	3-05-016-04	(tons lime prod)
o Raw Material Transfer & Handling	3-05-016-07	(tons lime prod)
o Raw Material Unloading	3-05-016-08	(tons lime prod)
o Lime Bins (2)	3-05-016-13	(tons lime prod)

C. Process and Controls

In the kraft process, the white liquor (sodium hydroxide and sodium sulfide), or cooking liquor, is added to the wood chips in the digesters and cooked. At the end of the cooking cycle, the contents of the vessel(s) are blown to a tank at atmospheric pressure, flashing off steam and noncondensable gases (NCG). The NCG will be collected and transported to the proposed new No. 4 Lime Kiln for incineration.

The spent liquor (black liquor) is then concentrated in the multiple effect evaporator system(s). Turpentine is a product of this cycle and is collected in a turpentine recovery system. NCG emitted will be collected and transported to the No. 4 Lime Kiln for incineration.

Sodium sulfate is added to the concentrated black liquor to make up for chemical losses. The liquor is burned in the recovery boiler, producing a smelt of sodium carbonate and sodium sulfide.

The smelt (green liquor solids) is dissolved in water to form green liquor. The emissions of total reduced sulfur (TRS) and particulate matter (PM) and visible emissions (VE) will be controlled with a flooded type elbow venturi scrubber system.

The green liquor is then slaked in the slaker system, in which quicklime (calcium oxide) is added to the green liquor to convert the sodium carbonate back to sodium hydroxide, thus reconstituting the cooking liquor. The PM emissions from the slaker system (slaker and associated causticizers) will be controlled with a scrubber system.

The spent lime cake (calcium carbonate) from the slaking cycle is recalined in a rotary lime kiln (No. 4) to produce quicklime for recausticizing the green liquor. The PM emissions and VE will be controlled with an electrostatic precipitator (ESP).

Purchased lime is delivered by both rail and truck to make up for process losses. The lime from the lime kiln (No. 4) and deliveries will be stored in lime storage bins. The PM emissions and VE will be controlled with a baghouse filter system.

In the Tall Oil Plant, soap from the soap tanks (East and West) is sent to an acidulator, where acid and steam are added to produce lignin and tall oil. The lignin is sent to a lignin tank and mixed with caustic to form dissolved lignin. The dissolved lignin is then sent to the East soap tank and eventually back to the pulp mill in the liquor from the soap tank. Tall oil produced in the acidulator is sent to a settling tank where caustic is added, and then to tall oil storage tanks. Acid water produced in the acidulator is sent to the saltcake tank. TRS emissions from the acidulator, lignin tank and saltcake tank will be controlled with a packed tower type scrubber and will use caustic soda as the absorbing medium.

## II. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules, 17-2 and 17-4.

The applications packages were deemed complete on December 24, 1987.

Nassau County is an area designated attainment for all pollutants.

The existing mill is a major emitting facility in accordance with FAC Rule 17-2.100(111) for the pollutants particulate matter (PM), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NOx), carbon monoxide (CO), total reduced sulfur (TRS), and volatile organic compounds (VOC). The facility is a kraft pulp mill, which is one of the major facility categories listed in Table 500-1, FAC Rule 17-2.

Based on the applicant's response, the batch digester system, the Kamyr digester system, the No. 5 MEE System, and the No. 4 SDT are considered existing non-NSPS (new source performance standards) sources. For these sources and the Tall Oil Plant, construction permit applications were required pursuant to FAC Rule 17-2.960(1)(d).

Since the applicant proposes to install a noncondensable gas (NCG) handling system to service the batch digester system, the Kamyr digester system and the No. 5 MEE System, and these gases will be incinerated in the proposed new No. 4 Lime Kiln, it will be assumed that these sources will have zero potential emissions to ambient when connected to the NCG system and no allowable pollutant emissions and, therefore, exempt from review pursuant to FAC Rule 17-2.500, Prevention of Significant Deterioration (PSD). The applicant projects that the SO<sub>2</sub> emissions, from the oxidation of the incinerated TRS gases, will not increase in the No. 4 Lime Kiln because of the natural scrubbing environment of the lime kiln system. These assumptions will be verified through pre and post tests for both TRS and SO<sub>2</sub> (see January 22, 1988 letter from C. H. Fancy). The results of the tests and their evaluations and comparisons will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$100.00/source (less than 25 TPY potential pollutant emissions) has already been received.

Pursuant to FAC Rule 17-2.960(1)(d)1.b., the batch digester system, the Kamyr digester system, and the No. 5 MEE System are to be in final compliance by May 12, 1989. However, if the applicant's Petition for Variance, OGC Case No. VE-45-313, is approved, then the final compliance date will be June 1, 1990.

There have not been any contemporaneous pollutant emission changes in the last five years.

The following table exhibits the projected maximum annual potential pollutant emissions associated with construction of new sources:

Table 1

Source	Maximum Potential Pollutant Emissions (TPY)					
	PM	SO <sub>2</sub>	TRS	CO	NOx	VOC
No. 4 Lime Kiln	190.0	117.1	11.5	29.8	819.9	44.7
Lime Slakers (2)	8.8					
Lime Bin #1	5.3					
Lime Bin #2	3.2					
Total:	207.3	117.1	11.5	29.8	819.9	44.7

Note: o Annual hours of operation: No. 4 Lime Kiln - 8736  
 Others - 8760  
 o Based on a 630 TPD lime product kiln (No. 4)

The following table exhibits the reduction in annual contemporaneous (actual) pollutant emissions projected from the retirement of existing sources:

Table 2

Source	Contemporaneous Pollutant Emissions (TPY)					
	PM	SO <sub>2</sub>	TRS	CO	NOx	VOC
Nos. 2 & 3 Lime Kilns	156.5	111.4	280.7	25.7	835.9	27.0
Slakers (2)	9.4					
Lime Conveying, Transfer and Storage	16.5					
Total:	182.4	111.4	280.7	25.7	835.9	27.0

Note: Based on 108,264 TPY (No. 2) and 133,632 TPY (No. 3) lime product kiln activities

The following table reflects the net annual potential pollutant emissions from the proposed project (Table 1) and the contemporaneous pollutant emissions (Table 2):

Table 3

	Net Potential Pollutant Emissions (TPY)					
	PM	SO <sub>2</sub>	TRS	CO	NOx	VOC
Table 1	207.3	117.1	11.5	29.8	819.9	44.7
Table 2	182.4	111.4	280.7	25.7	835.9	27.0
Net:	+24.9	+5.7	-269.2	+4.1	-16.0	+17.7

Since there are no significant net emissions increase of a pollutant pursuant to Table 500-2, FAC Rule 17-2, the proposed project is a minor modification and the pollutant emissions are not subject to review pursuant to FAC Rule 17-2.500, PSD. Therefore, the pollutant emissions are subject to review pursuant to FAC Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Requirements. For the No. 4 Lime Kiln, the applicant requested a restriction on the annual hours of operation, which is 8736, in order to avoid PSD new source review pursuant to FAC Rule 17-2.500(5). Since the No. 4 Lime Kiln is the control device for the batch digester system, the Kamyrdigester system and the No. 5 MEE System, the restriction in the annual hours of operation to 8736 is assumed and will be applied to these sources as well.

The NSPS, 40 CFR 60, Subpart BB, Kraft Pulp Mills, was adopted by reference in accordance with FAC Rule 17-2.660(1)(a). The proposed new No. 4 Lime Kiln is subject to the provisions of this NSPS.

In accordance with 40 CFR 60.282(a)(3), no owner or operator shall cause to be discharged into the atmosphere from any lime kiln any gases which contain PM in excess of 0.30 g/dscfm (0.13 gr/dscf) corrected to 10% oxygen when liquid fossil fuel is burned. However, the applicant has requested this emission rate with a mass emission limit of 45.3 lbs/hr, which is more stringent than what would be allowed. The DER's Bureau of Air Quality Management (BAQM) accepts the request and shall make the request a part of the permit. Compliance tests for PM emissions shall be measured using EPA Methods 1, 2, 3, and 5, pursuant to 40 CFR 60, Appendix A, FAC Rule 17-2.700, 40 CFR 60.285(a)(1) through (4), and 40 CFR 60.285(b).

In accordance with 40 CFR 60.283(a)(5), no owner shall cause to be discharged into the atmosphere from any lime kiln any gases which contain TRS in excess of 8 ppm by volume on a dry basis, corrected to 10% oxygen. Compliance tests for TRS emissions shall be measured using EPA Methods 3 and 16 or 16A pursuant to 40 CFR 60, Appendix A, FAC Rule 17-2.700, and 40 CFR 60.285(d).

For the No. 4 Lime Kiln, the applicant applied for the use of No. 6 fuel oil, having a maximum of 3.0 % sulfur content, by weight. A storage tank specifically for this type of fuel oil must be available, since there are other sources at the facility that are permitted the use of No. 6 fuel oil, but at a lower sulfur content, by weight. ASTM D 396-76, Standard Specification for Fuel Oils, shall be used to verify the constituents of the No. 6 fuel oil designated to be used exclusively in the No. 4 Lime Kiln.

A pre and post test for TRS and SO<sub>2</sub> shall be performed to verify total destruction of the TRS gases from the NCG handling system and to establish the overall SO<sub>2</sub> removal efficiency of the No. 4 Lime Kiln (see the January 22, 1988 letter from C. H. Fancy). Test methods that shall be used are EPA Methods 3, 6, 16 or 16A, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

The proposed No. 4 Lime Kiln is subject to the provisions of 40 CFR 60.284, Monitoring of Emissions and Operations, and FAC Rule 17-2.710, Continuous Monitoring Requirements.

The No. 4 Lime Kiln shall be in final compliance by November 12, 1990, pursuant to FAC Rule 17-2.960(1)(d)3.b.(ii).

Since there is not a VE standard for a lime kiln pursuant to 40 CFR 60.282, the No. 4 Lime Kiln, whose VE are controlled with an ESP system, shall be subject to the provisions of FAC Rule 17-2.610(2), General Visible Emissions Standard. The VE standard is less than 20% opacity. The lime slakers (2), whose VE are controlled with a scrubber system, are also subject to the provisions of this regulation. Compliance tests shall be performed using EPA Method 9 pursuant the FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Because there is not a specific source PM emission limiting standard for a lime slaker, the applicant proposed a limit of 1.0 lb/hr/slaker (4.4 tons/yr/slaker; total of 8.8 tons/yr for two slakers), which is acceptable to the Department. The Department will require PM mass emissions compliance tests using EPA Methods 1, 2, 3, and 5, in accordance with 40 CFR 60, Appendix A, and FAC Rule 17-2.700.

The lime storage bins (2) will each have a baghouse system to control both PM emissions and VE. The projected potential PM emissions of the lime storage bins are 1.2 lbs/hr (5.3 TPY) for the No. 1 Lime Bin and 0.74 lb/hr (3.2 TPY) for the No. 2 Lime Bin. Operational activity is such that these sources are subject to FAC Rule 17-2.610(3), Unconfined Emissions of PM. The use of a baghouse system is considered to be reasonable control for this type of operational activity. Therefore, pursuant to FAC Rule 17-2.700(3)(d), a VE standard of no visible emissions (5% opacity) will be imposed. Compliance testing shall be performed using EPA Method 9 in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A. Failure to comply with the VE standard will necessitate the requirement to perform a PM mass emissions test(s) using EPA Methods 1, 2, 3, and 5, in accordance with 40 CFR 60, Appendix A, and FAC Rule 17-2.700.



The applicant requested and based the PM potential emissions of the lime storage bins (2) on a PM mass emission rate of 0.03 gr/dscf, which will be the specifications of the baghouse filter control systems. The Department finds the PM emission rate to be acceptable. However, if a PM mass emissions test is required due to a failure to comply with the VE standard and the applicant cannot achieve the PM emission rate of 0.03 gr/dscf, the potential PM emissions from these sources will have to be recalculated and reviewed pursuant to FAC Rule 17-2.500, PSD.

The No. 4 SDT is subject to the provisions of FAC Rules 17-2.600(4)(c)4.a. and 17-2.600(4)(c)4.b. According to FAC Rule 17-2.600(4)(c)4.a., the TRS emission limiting standard is 0.048 pound per each 3000 pounds black liquor solids as hydrogen sulfide (2.20 lbs/hr, 9.64 TPY; based on No. 4 Recovery Boiler at 137,500 lbs BLS/hr). According to FAC Rule 17-2.600(4)(c)4.b., the No. 4 SDT shall be in compliance with FAC Rule 17-2.710, Continuous Monitoring Requirements, and FAC Rule 17-2.960(1), Compliance Schedules. Compliance shall be demonstrated using EPA Methods 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the No. 4 SDT shall be in compliance with FAC Rules 17-2.710(3), Establishing Specific Surrogate Parameters.

The PM mass emission limit of 28.5 lbs/hr (122.0 TPY) for the No. 4 SDT is based on FAC Rule 17-2.610(1), Process Weight Table, and a maximum total process input rate of 56,513 lbs/hr (28.26 TPH) smelt (green liquor solids). Compliance shall be demonstrated using EPA Method 5 or 17 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

The VE limiting standard for the No. 4 SDT is less than 20% opacity pursuant to FAC Rule 17-2.620(2). Compliance shall be demonstrated using EPA Method 9 pursuant to FAC Rules 17-2.700 and 40 CFR 60, Appendix A.

The No. 4 SDT shall be in final compliance by May 12, 1989, pursuant to FAC Rule 17-2.960(1)(d)1.b.

In accordance with FAC Rule 17-2.400(4)(c)2., TRS emissions from the Tall Oil Plant operation shall not exceed 0.05 lb/ton crude tall oil produced as a 12-hour average. Compliance shall be demonstrated using EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Pursuant to FAC Rule 17-2.400(4)(c)2.b., the Tall Oil Plant is subject to the requirements of FAC Rule 17-2.710, which includes FAC Rule 17-2.710(3), General Requirements and Establishing Specific Surrogate Parameters.

The Tall Oil Plant shall be in final compliance by May 12, 1989, pursuant to FAC Rule 17-2.960(1)(d)1.b.

The No. 4 SDT and the Tall Oil Plant are 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.

All of the sources are subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operations-Problems. Any notification required should be made or sent to the DER's Northeast District office.

All of the sources are subject to the provisions of FAC Rule 17-2.700(4), Quarterly Reporting Requirements, and 17-4.140, Reports.

In accordance with FAC Rule 17-2.610(3), Unconfined Emissions of PM, reasonable precautions to control emissions of unconfined PM shall include, but not be limited to the following:

- A) Reduced speeds for vehicular traffic.
- B) Use of liquid resinous adhesives or other liquid dust suppressants or wetting agents.
- C) Use of paving or other asphaltic materials.
- D) Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or otherwise by wetting prior to sweeping.
- E) Covering of trucks, trailers, front end loaders, and other vehicles or containers to prevent spillage of particulate matter during transport.
- F) Use of mulch, hydroseeding, grassing and/or other vegetative ground cover on barren areas to prevent or reduce windblown particulate matter.
- G) Use of hoods, fans, filters, and similar equipment to contain, capture, and vent particulate matter.
- H) Enclosure or covering of conveyor systems.

In accordance with FAC Rule 17-2.620(2), objectionable odors shall not be allowed off plant property.

A meter shall be installed to measure the scrubbing liquid supply pressure on the lime slaker scrubber system, the Tall Oil Plant operations scrubber, and the No. 4 SDT scrubber, and the pressure sensor or tap is to be located close to the scrubber liquid discharge point. The monitoring device is to be certified by the manufacturer to be accurate within  $\pm 15$  percent of design scrubbing liquid supply pressure.

A fuel flow meter shall be installed on the fuel line (i.e., No. 6 fuel oil) to the No. 4 Lime Kiln.

### III. Summary of Emissions and Air Quality Analysis

#### A. Emission Limitations

Since all of the pollutant emissions from the batch digester system, the Kamyr digester system, and the No. 5 MEE system will be vented to the proposed new No. 4 Lime Kiln for incineration, there will not be any potential or allowable emissions permitted.

The regulated pollutant emissions from the proposed project and modification are PM and TRS. Various sources contained in the proposed project and modification are subject to visible emission (VE) standards. The following table will reflect the maximum allowable emissions standards and limits applicable to the proposed project and modification:

Table 4

Source	Pollutant	Max. Allowable Emissions Standard/Limit
No. 4 Lime Kiln	PM	Not to exceed 0.30 g/dscm (0.13 gr/dscf) corrected to 10% oxygen, when liquid fossil fuel is burned (45.3 lbs/hr, 190.0 TPY)
	VE	Not to exhibit 20% opacity or greater
	TRS	Not to exceed 8 ppm by volume on a dry basis, corrected to 10% oxygen; while on liquid fossil fuel (2.63 lbs/hr, 11.5 TPY)
Lime Bins (Nos. 1 & 2)	VE	Not exhibit any VE (5% opacity)
	PM	Not to exceed 1.0 lb/hr/slaker 4.4 tons/yr/slaker
Lime Slakers (2)	VE	Not to exhibit 20% opacity or greater
No. 4 SDT	PM	Not to exceed 28.5 lbs/hr, 122.0 TPY
	TRS	Not to exceed 0.048 lb/3000 lbs BLS as H <sub>2</sub> S (2.20 lbs/hr, 9.64 TPY)
	VE	Not to exceed 20% opacity or greater
Tall Oil Plant	TRS	Not to exceed 0.05 lb/ton crude tall oil produced as a 12-hour average (0.43 lb/hr, 1.9 TPY)

Note: see Table 1's Note for rationale

The emission limiting standards and limits are consistent with the applicable requirements pursuant to FAC Rules 17-2 and 17-4 and the NSPS, 40 CFR 60, Subpart BB, which is adopted by reference pursuant to FAC Rule 17-2.660.

#### B. Air Quality Analysis

From a technical review of the application packages and their amendments, the Department has determined that the proposed project and modification does not require an air quality analysis.

#### IV. Conclusion

The allowable pollutant emissions limiting standards and limits from the proposed project and modification should not cause any violation to Florida's ambient air quality standards.

The General and Specific Conditions listed in the proposed permits (attached) will assure compliance with all applicable requirements of FAC Rules 17-2 and 17-4 and the NSPS, 40 CFR 60, Subpart BB, Appendix A, and Appendix B.

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

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

**Permit Number:** AC 45-141871  
**Expiration Date:** September 24, 1989  
**County:** Nassau  
**Latitude/Longitude:** 30° 40' 53"N  
81° 27' 26"W  
**Project:** Kamyrdigester 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 Kamyrdigester system and the construction/installation of a noncondensable gas (NCG) handling system to capture and deliver pollutant emissions to the new No. 4 Lime Kiln for incineration. The existing Kamyrdigester consists of a chip steaming tank, continuous digester, blow tank, two flash tanks, and a turpentine recovery system. Two new flash tanks and turpentine recovery system will be constructed to replace the existing ones. The maximum daily pulp production will be 1819 TPD ADP (tons per day of air dried pulp). 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 Kamyrdigester System 3-07-001-01

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. Mr. C. H. Fancy's letter dated January 22, 1988.
6. Mr. Paul J. Magnell's letter dated February 23, 1988, and received February 24, 1988.
7. Technical Evaluation and Preliminary Determination dated March 1, 1988.

**PERMITTEE:**  
Container Corporation of  
America

**Permit Number:** AC 45-141871  
**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 45-141871  
**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 45-141871  
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 45-141871  
**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 Kamyr digester system's operating hours shall not exceed 8736 hours per year.
2. The production rate of the Kamyr digester system shall not exceed 1819 TPD ADP (tons per day of air dried pulp and based on a nominal utilization rate of 264,798 lbs/hr wood chips (dry) and 1,388,110 lbs/hr black/white liquor).

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141871  
Expiration Date: September 24, 1989

**SPECIFIC CONDITIONS:**

3. The Kamyrdigester system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 4 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 8 ppmvd corrected to 10% O<sub>2</sub>, in accordance with 40 CFR 60.283(a)(1).

4. The Kamyrdigester system is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

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

6. The Kamyrdigester system is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

7. The Kamyrdigester system is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.

8. Compliance tests using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be conducted if the permittee does not incinerate the TRS gases from the Kamyrdigester system in the No. 4 Lime Kiln.

9. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

10. Pursuant to FAC Rule 17-2.600(4)(c)1.d., the Kamyrdigester system is subject to the provisions of FAC Rule 17-2.960(1), Compliance Schedules, which requires that final compliance be demonstrated by May 12, 1989, unless the Variance, OGC Case No. VE-45-313, is approved to allow final compliance by June 1, 1990.

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

**PERMITTEE:**  
Container Corporation of  
America

**Permit Number:** AC 45-141871  
**Expiration Date:** September 24, 1989

**SPECIFIC CONDITIONS:**

12. The DER's Northeast District office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the NE District office within 45 days of test completion.

13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results, the Certificate of Completion, and the contingency plan, 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. Operation beyond the construction permit expiration date requires a valid permit to operate. (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)

14. 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 DER's Bureau of Air Quality Management office and Northeast District office.

15. The No. 4 Lime Kiln construction/operating permit(s) shall have a Specific Condition that the No. 4 Lime Kiln is the pollution control device for the Kamyrdigester system.

16. The No. 4 Lime Kiln shall be tested for TRS and SO<sub>2</sub> emissions after the Kamyrdigester system's TRS noncondensable gas handling system has been connected to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$100.00 (less than 25 TPY potential emissions) has already been received.

Issued this \_\_\_\_\_ day of \_\_\_\_\_,  
19\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Dale Twachtmann, Secretary

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

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

Permit Number: AC 45-141872  
Expiration Date: September 24, 1989  
County: Nassau  
Latitude/Longitude: 30° 40' 53"N  
81° 27' 26"W  
Project: Batch Digester 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 batch digester system and the construction/installation of a noncondensable gas (NCG) handling system to capture and deliver pollutant emissions to the new No. 4 Lime Kiln for incineration. The existing batch digester system consists of 7 batch digesters, 2 blow tanks, and a turpentine recovery system. A new hot water accumulator will be constructed to condense steam from the blow tanks. Also, a new turpentine recovery system will be constructed to replace the existing one. The maximum daily pulp production will be 1391 TPD ADP (tons per day of air dried pulp). 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 Batch Digester System 3-07-001-01

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

AC 45-141872

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. Mr. C. H. Fancy's letter dated January 22, 1988.
6. Mr. Paul J. Magnell's letter dated February 23, 1988, and received February 24, 1988.
7. Technical Evaluation and Preliminary Determination dated March 1, 1988.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141872  
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 45-141872  
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 45-141872  
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 45-141872  
**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 batch digester system's operating hours shall not exceed 8736 hours per year.
2. The maximum production rate of the batch digester system shall not exceed 1391 TPD ADP (tons per day of air dried pulp and based on a nominal utilization rate of 212,418 lbs/hr wood chips (dry) and 443,954 lbs/hr of black/white liquor).

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141872  
Expiration Date: September 24, 1989

**SPECIFIC CONDITIONS:**

3. The batch digester system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 4 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 8 ppmvd corrected to 10% O<sub>2</sub>, in accordance with 40 CFR 60.283(a)(1).

4. The batch digester system is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

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

6. The batch digester system is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

7. The batch digester system is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.

8. Compliance tests using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be conducted if the permittee does not incinerate the TRS gases from the batch digester system in the No. 4 Lime Kiln.

9. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

10. Pursuant to FAC Rule 17-2.600(4)(c)1.d., the batch digester system is subject to the provisions of FAC Rule 17-2.960(1), Compliance Schedules, which requires that final compliance be demonstrated by May 12, 1989, unless the Variance, OGC Case No. VE-45-313, is approved to allow final compliance by June 1, 1990.

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

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141872  
Expiration Date: September 24, 1989

**SPECIFIC CONDITIONS:**

12. The DER's Northeast District office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the NE District office within 45 days of test completion.

13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results, the Certificate of Completion, and the contingency plan, 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. Operation beyond the construction permit expiration date requires a valid permit to operate. (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)

14. 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 DER's Bureau of Air Quality Management office and Northeast District office.

15. The No. 4 Lime Kiln construction/operating permit(s) shall have a Specific Condition that the No. 4 Lime Kiln is the pollution control device for the batch digester system.

16. The No. 4 Lime Kiln shall be tested for TRS and SO<sub>2</sub> emissions after the batch digester system's TRS noncondensable gas handling system has been connected to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$100.00 (less than 25 TPY potential emissions) has already been received.

Issued this \_\_\_\_\_ day of \_\_\_\_\_,  
19\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Dale Twachtmann, Secretary

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

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

Permit Number: AC 45-141873  
Expiration Date: September 24, 1989  
County: Nassau  
Latitude/Longitude: 30° 40' 53"N  
81° 27' 26"W  
Project: No. 5 Multiple Effect  
Evaporator 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 No. 5 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s) and concentrator(s). A new hot well will replace the existing hot well. A noncondensable gas handling system will be constructed to collect and transport all of the pollutant emissions from the No. 5 MEE System to the No. 4 Lime Kiln for incineration. The project will occur at the permittee's existing kraft pulp mill. 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 No. 5 MEE System 3-07-001-03

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. Mr. C. H. Fancy's letter dated January 22, 1988.
6. Mr. Paul J. Magnell's letter dated February 23, 1988, and received February 24, 1988.
7. Technical Evaluation and Preliminary Determination dated March 1, 1988.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141873  
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 45-141873  
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 45-141873  
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 45-141873  
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 maximum hours of operation of the No. 5 MEE System shall not exceed 8736 annually.

2. The maximum total process input rate of Black Liquor to the No. 5 MEE System shall not exceed 1,340,690 lbs/hr at 23% solids (equivalent to 308,359 lbs/hr of Black Liquor Solids (BLS)).

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141873  
Expiration Date: September 24, 1989

**SPECIFIC CONDITIONS:**

3. The No. 5 MEE System is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to Florida Administrative Code (FAC) Rule 17-2.400(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 4 Lime Kiln, from which the exhaust gases shall not contain TRS in excess of 8 ppmvd corrected to 10% O<sub>2</sub>, in accordance with 40 CFR 60.283(a)(1).
4. The No. 5 MEE System is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.
5. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.
6. Objectionable odors shall not be allowed off of plant property in accordance with FAC Rule 17-2.620(2).
7. In the event that a compliance test has to be performed on the No. 5 MEE System for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used.
8. Pursuant to FAC Rule 17-2.600(4)(c)1.d., the No. 5 MEE System is subject to the provisions of FAC Rule 17-2.960(1), Compliance Schedules, which requires that final compliance be demonstrated by May 12, 1989, unless the Variance, OGC Case No. VE-45-313, is approved to allow final compliance by June 1, 1990.
9. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.
10. The No. 5 MEE System is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.
11. The No. 5 MEE System is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.
12. The DER's Northeast District office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the district office within 45 days of test completion.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141873  
Expiration Date: September 24, 1989

**SPECIFIC CONDITIONS:**

13. 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 Certificate of Completion, and the contingency plan, 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. Operation beyond the construction permit expiration date requires a valid permit. (FAC Rules 17-2 & 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)

14. 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 DER's BAQM office and the Northeast District office.

15. The No. 4 Lime Kiln construction/operating permit(s) shall have a Specific Condition that it is the pollution control device for the No. 5 MEE System.

16. The No. 4 Lime Kiln shall be tested for TRS and SO<sub>2</sub> emissions after the No. 5 MEE System's TRS noncondensable gas handling system has been connected to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$100.00 (less than 25 TPY potential emissions) has already been received.

Issued this \_\_\_\_\_ day of \_\_\_\_\_,  
19\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Dale Twachtmann, Secretary

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

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.

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 17-2.400(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 \_\_\_\_\_ day of \_\_\_\_\_,  
19\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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Dale Twachtmann, Secretary

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

**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.

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<sub>2</sub>S) 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

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Dale Twachtman, Secretary



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

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

Permit Number: AC 45-141877  
Expiration Date: March 27, 1991  
County: Nassau  
Latitude/Longitude: 30° 40' 53"N  
81° 27' 26"W  
Project: No. 4 Lime Kiln with an  
Electrostatic Precipitator

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 construction of a new 630 TPD lime kiln (No. 4), with an associated electrostatic precipitator (ESP) control system, to replace the existing Nos. 2 and 3 Lime Kilns. The lime kiln will be heated using No. 6 fuel oil with a maximum sulfur content of 3.0%, by weight. 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

A. Pulp and Paper Industry

Major Group 26: Sulfate (Kraft) Pulping

o Lime Kiln 3-07-001-06

B. Mineral Products

Major Group 32: Lime Manufacture

o Calcining-Rotary Lime Kiln 3-05-016-04

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

AC 45-141877

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. Mr. C. H. Fancy's letter dated January 22, 1988.
6. Mr. Paul J. Magnell's letter dated February 23, 1988, and received February 24, 1988.
7. Technical Evaluation and Preliminary Determination dated March 1, 1988.

**PERMITTEE:**  
Container Corporation of  
America

**Permit Number:** AC 45-141877  
**Expiration Date:** March 27, 1991

**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 45-141877  
Expiration Date: March 27, 1991

**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 45-141877  
**Expiration Date:** March 27, 1991

**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)
- (x) Compliance with New Source Performance Standards

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

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

**PERMITTEE:**  
Container Corporation of  
America

**Permit Number:** AC 45-141877  
**Expiration Date:** March 27, 1991

**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 Lime Kiln operating hours shall not exceed 8736 hours annually.
2. The maximum lime production rate shall not exceed 630 TPD (tons/day), corresponding to a process input rate of 93,749 lbs/hr of lime mud.
3. The No. 6 fuel oil firing rate shall not exceed 1176.8 gals/hr (170.63 MMBtu/hr heat input). The sulfur content of the fuel oil shall not exceed 3.0%, by weight.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141877  
Expiration Date: March 27, 1991

**SPECIFIC CONDITIONS:**

4. In accordance with 40 CFR 60.282(a)(3), the particulate matter (PM) emissions from the No. 4 Lime Kiln and its associated ESP control system shall not exceed 0.30 g/dscfm (0.13 gr/dscf; 45.3 lbs/hr, 190.0 TPY) corrected to 10% oxygen when liquid fossil fuel is burned.

5. In accordance with 40 CFR 60.283(a)(5), the total reduced sulfur (TRS) from the No. 4 Lime Kiln and its associated ESP control system shall not exceed 8 ppm by volume on a dry basis, corrected to 10% oxygen (2.63 lbs/hr, 11.5 TPY).

6. For inventory and future PSD review purposes:

Pollutant	Emissions	Basis
SO <sub>2</sub>	26.8 lbs/hr, 117.1 TPY	0.2 lb/ton ADP
NOx	819.9 TPY	1.1 lb/10 <sup>6</sup> Btu
VOC	44.7 TPY	0.06 lb/10 <sup>6</sup> Btu
CO	29.8 TPY	0.04 lb/10 <sup>6</sup> Btu
PM <sub>10</sub>	168.2 TPY	88.5% of PM (TSP)

Note: Pollutant emissions are based on 8736 hrs/yr (PSD permit restriction)

7. Visible emissions shall be limited to less than 20% opacity, in accordance with Florida Administrative Code (FAC) Rule 17-2.610(2).

8. The noncondensable gas (NCG) handling system associated with the batch digester system, the Kamyr digester system, and the No. 5 Multiple Effect Evaporator System, shall be connected to the No. 4 Lime Kiln to incinerate the gases.

9. Monitoring of emissions and operations shall be in accordance with 40 CFR 60.284(a), (c), (d) and (e).

10. The No. 4 Lime Kiln is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.

PERMITTEE:  
Container Corporation of  
America

Permit Number: AC 45-141877  
Expiration Date: March 27, 1991

**SPECIFIC CONDITIONS:**

11. Initial and annual compliance tests shall be conducted in accordance with FAC Rule 17-2.700, 40 CFR 60.285, and 40 CFR 60, Appendix A:

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

12. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

13. For the affected sources, the permittee shall provide proof to the DER's Northeast District office of compliance with FAC Rule 17-2.960(1)(d)1.b., by May 12, 1989, unless the Variance, OGC Case No. VE-45-313, is approved to allow final compliance by June 1, 1990.

14. This project shall comply with all the applicable requirements of FAC Rules 17-2 and 17-4, and 40 CFR 60, Subpart BB, Standards of Performance for Kraft Pulp Mills.

15. The DER's Northeast District office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the NE District office within 45 days of the test completion.

16. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction and achieve final compliance on schedule, the DER's Bureau of Air Quality Management (BAQM) office and Northeast District office must be notified in writing 60 days prior to the final compliance date of the construction permit and the permittee shall submit appropriate information pursuant to FAC Rule 17-2.960(1)(e).



**PERMITTEE:**  
Container Corporation of  
America

**Permit Number:** AC 45-141877  
**Expiration Date:** March 27, 1991

**SPECIFIC CONDITIONS:**

17. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and 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. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rules 17-2 and 17-4)

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct, which can take up to 90 days to process a complete application. (FAC Rule 17-4)

18. 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 BAQM office and Northeast District office.

19. The No. 4 Lime Kiln shall be tested for TRS and SO<sub>2</sub> emissions before and after connecting the TRS NCG handling system to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The TRS emissions tests, using EPA Methods 3 and 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to verify complete destruction of the pollutant. The SO<sub>2</sub> emissions tests, using EPA Method 6 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to establish the overall removal efficiency of the No. 4 Lime Kiln. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee(s) pursuant to FAC Rule 17-4 for the NCG handling system's associated sources (see Specific Condition # 8).

20. Objectionable odors shall not be allowed off of the plant property pursuant to FAC Rule 17-2.620(2).

**PERMITTEE:**  
Container Corporation of  
America

Permit Number: AC 45-141877  
Expiration Date: March 27, 1991

**SPECIFIC CONDITIONS:**

21. The No. 2 and No. 3 lime kilns shall be shutdown and their operating permits surrendered to the DER's Northeast District office no later than the expiration date of this permit.

22. A separate No. 6 fuel oil storage tank shall be provided to store the fuel oil with the maximum 3.0% sulfur content, by weight, which will be permitted for use exclusively in the No. 4 Lime Kiln.

23. Reasonable precautions shall be taken to control emissions of unconfined PM pursuant to FAC Rule 17-2.610(3).

24. The No. 4 Lime Kiln is subject to the provisions of 40 CFR 60, Subpart A, General Provisions.

Issued this \_\_\_\_ day of \_\_\_\_\_,  
19\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Dale Twachtmann, Secretary

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

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

Permit Number: AC 45-141878  
Expiration Date: March 27, 1991  
County: Nassau  
Latitude/Longitude: 30° 40' 53"N  
81° 27' 26"W  
Project: Lime Slakers/Lime Bins  
& Associated Control Sys.

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 construction of two new lime slakers, to replace the existing lime slakers, and three new causticizers to serve each lime slaker (the two slaker systems will operate in parallel). Two new lime storage bins will be constructed to replace the existing bins, which will support the new No. 4 Lime Kiln and the slaker systems. The No. 1 Lime Bin will receive lime from the No. 4 Lime Kiln by bucket elevator and by truck using a pneumatic conveyor. The No. 2 Lime Bin will receive purchased lime only by rail or truck. The lime slaker systems will have scrubber control systems to control pollutant emissions. The lime storage bins will have baghouse filter control systems to control pollutant emissions. 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:

- A. Pulp & Paper Industry
  - Major Group 26: Sulfate (Kraft) Pulping
    - o Lime Slakers (2) 3-07-001-99
    - o Lime Bins (2) 3-07-001-99
- B. Mineral Products
  - Major Group 32: Lime Manufacture
    - o Raw Material Transfer & Handling 3-05-016-07
    - o Raw Material Unloading 3-05-016-08
    - o Lime Silos 3-05-016-13

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

ATTACHMENTS

AC 45-141878

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.

**PERMITTEE:**  
Container Corporation of  
America

**Permit Number:** AC 45-141878  
**Expiration Date:** March 27, 1991

**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 45-141878  
**Expiration Date:** March 27, 1991

**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 45-141878  
Expiration Date: March 27, 1991

**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 45-141878  
**Expiration Date:** March 27, 1991

**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 Lime Slaker systems may operate continuously (i.e. 8760 hours per year).
2. The maximum lime feed rate to each slaker shall not exceed 380 tons per day, which reflects 45.8 tons per hour green liquor solids (dry) feed rate.
3. The maximum process input rate to Nos. 1 and 2 Lime Bins shall not exceed 52,500 lbs/hr and 88,000 lbs/hr respectively.



**PERMITTEE:**  
Container Corporation of  
America

**Permit Number:** AC 45-141878  
**Expiration Date:** March 27, 1991

**SPECIFIC CONDITIONS:**

4. Particulate matter (PM) emissions from each slaker system, which includes the lime slaker and the associated causticizers, shall not exceed 1.0 lb/hr or 4.4 TPY. Visible emissions (VE) shall be limited to less than 20% opacity in accordance with Florida Administrative Code (FAC) Rule 17-2.610(2).
5. Each baghouse control system associated with the lime storage bins (Nos. 1 & 2) shall not exhibit any VE (5% opacity) pursuant to FAC Rule 17-2.700(3)(d). Compliance shall be demonstrated using EPA Method 9 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.
6. Failure to comply with Specific Condition No. 5 will necessitate the requirement to perform a mass emissions test for PM using EPA Methods 1, 2, 3, and 5, pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A. PM emissions shall not exceed 0.03 gr/dscf (Lime Bin #1: 1.2 lbs/hr, 5.3 TPY; Lime Bin #2: 0.74 lb/hr, 3.2 TPY).
7. Initial and annual compliance test for the slaker systems shall be conducted using EPA Method 5 or 17, Determination of Particulate Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.
8. The lime handling system (i.e., conveyors, shutes, elevators, storage bins, etc.) shall be enclosed to minimize PM emissions pursuant to FAC Rule 17-2.610(3).
9. The project shall comply with all applicable provisions of FAC Rule 17-2 and 17-4.
10. The slaker systems and lime storage bins are subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.
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.

**PERMITTEE:**  
Container Corporation of  
America

Permit Number: AC 45-141878  
Expiration Date: March 27, 1991

**SPECIFIC CONDITIONS:**

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 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.

Issued this \_\_\_\_\_ day of \_\_\_\_\_,  
19\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Dale Twachtman, Secretary

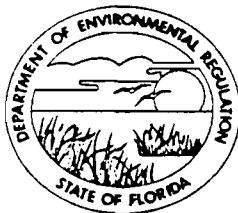
ATTACHMENT 1

Available Upon Request.

ATTACHMENT 2

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

December 10, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Magnell:

Re: Completeness Review for Applications to Construct  
AC 45-141871, -141872, -141873, -141874, -141875,  
-141877 and -141878

The Department received the above referenced application packages on November 12, 1987. Based on a review of the material submitted, the applications are deemed incomplete. Therefore, submit to the DER's Bureau of Air Quality Management (BAQM) office, including all assumptions, calculations and reference material, the following information and the status can, again, be ascertained:

1. For reference purposes, the assigned permit numbers and sources are:

AC 45-141871: Kamyf Digester System  
-141872: Batch Digester System  
-141873: No. 5 Multiple Effect Evaporator (MEE) System  
-141874: Tall Oil Plant  
-141875: No. 4 Smelt Dissolving Tank (SDT)  
-141877: No. 4 Lime Kiln  
-141878: Lime Slakers/Lime Bins

2. Until the Petition for Variance has been acted upon regarding the No. 5 MEE system, batch digester system and Kamyf digester system, the final compliance date is not approvable.

3. Please provide an ambient air quality standards (AAQS) analysis and a prevention of significant deterioration (PSD) maximum concentration increase (increment) analysis for all pollutants which have a facility-wide PSD significant net emissions increase. These analyses should be sufficient to

Mr Paul J. Magnell  
Page Two  
December 10, 1987

give the Department reasonable assurance that the net emissions increase will not cause or contribute to any AAQS or increments violation.

4. A permit amendment request will have to be submitted to the DER's BAQM office for the No. 6 MEE System to reflect the changes associated with the mill's TRS control strategy in the collection and transporting of the TRS emissions to the proposed No. 4 lime kiln.
5. If the Petition for Variance is denied, is it the mill's intention to proceed with the permitting of the proposed new No. 4 lime kiln and causticizing system? If not, please explain and what source(s) would then be designated as the combustion source(s) for the gases collected and transported in the TRS noncondensable gas handling (NCG) system and would require an application and fee submittal?
6. For the tall oil plant, the requested total process input rate has increased above the rate contained in the interim operating permit and its application. Has this source been compliance tested at this input rate requested? If so, please submit a copy of the test(s) results. Is the present source capable of operating at the proposed increased total process input rate and complying with Florida Administrative Code (FAC) Rule 17-2?
7. The appropriate fee for the Kamyr digester system, batch digester system, No. 5 MEE system and No. 4 SDT, is \$1000.00 each. Therefore, remit to the Department of Environmental Regulation the deficient amount of \$900.00 per source, for a total amount of \$3600.00.
8. As provided on the page designated CCA.L.S.2, please calculate in the same way the maximum process rate for the existing lime slaker system and the lime bin system.
9. For the lime slaker and lime bin systems, please calculate the net change in the potential pollutant emissions between the existing and the proposed systems. Also, please provide the maximum hourly and daily and the annual raw materials and chemicals processed through each system in the last two years. Each existing system's emissions should be based on the methodology used to calculate contemporaneous emissions pursuant to FAC Rules 17-2.500(2)(e) and 17-2.510(2)(e).

Mr. Paul J. Magnell  
Page Three  
December 10, 1987

10. Since September 24, 1976, has there been any physical change or change in the method of operation for any of the existing sources for which applications have been submitted? If so, please document and describe the nature of the change(s) and their associated cost(s).

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

Sincerely,



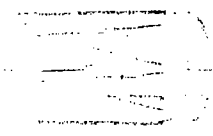
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/BM/s

cc: B. Stewart, NE District  
B. Pittman, Esq.  
R. Hagan, CCA  
B. Williams, JSC  
D. Buff, P.E., KBN

ATTACHMENT 3





**JSC/CCA**

23 Dec. 1987  
Fernandina Beach, FL  
CM: P 093 976 925

JEFFERSON SMURFIT CORPORATION & CONTAINER CORPORATION OF AMERICA

CERTIFIED MAIL

December 17, 1987

**Mill Division**

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

**DER**

DEC 24 1987

**BAQM**

Mr. C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Completeness Review for Applications to Construct  
AC 45-141871, -141872, -141873, -141874, -141875, -141877, -141878

Dear Mr. Fancy:

We received the above-referenced completeness review in reference to the construction permit applications listed. The following will represent our response to the questions raised in that review. The responses are referenced to the question number as listed in your December 10 letter.

1. We have noted the assigned permit numbers and sources.
2. We understand that the final compliance dates of the affected sources are not approvable until the Petition for Variance has been acted upon. We would, however, like to restate that our present planning and scheduling of this project is based upon the Department taking favorable action on this Petition in the very near future. Further delays in granting the variance will only serve to make the task of completing the necessary design, construction, and start-up functions in a timely manner much more difficult and may cause a delay in the actual start-up dates which we have proposed.
3. Since the new No. 4 lime kiln will be an NSPS source, we have included in its application package an analysis which shows that there will be no PSD significant net emissions increase in any pollutant as a result of its construction and start-up. This includes three TRS sources which will be collected and incinerated in that kiln. Since the only other affected TRS sources in the mill will be controlled via scrubbing, it is clear that facility-wide, there will be no PSD significant net emissions increase as a result of the TRS control projects.
4. We intend to submit a permit amendment request for the No. 6 MEE system to reflect changing its incineration device to the new No. 4 kiln. However, since that particular change will not be done until 1990, and since it will not require a construction permit, we have not intended to file that request until sometime in 1989. Please advise if there is some reason that this would be required earlier than we had planned.

5. The mill's commitment to proceed with the permitting and construction of the new kiln and causticizing system is independent of the Petition for Variance. The replacement of the existing kilns and causticizing equipment is necessary in order to bring that area into compliance with the TRS Rule.
6. In a letter dated October 26, 1987, CCA requested that the tall oil plant interim operating permit maximum operating rate be amended to show the peak maximum operating rate, as advised by Steve Smallwood. This rate was determined to be 8.5 tons/hr of crude tall oil. That amendment was accepted by the Department in a letter dated November 12, 1987. Since the TRS potential and allowable emissions are calculated solely on the basis of CTO produced, and since only the crude tall oil production rate is listed as a specific condition on the interim operating permit, the process input rates were not adjusted at that time.
7. The permit processing fees submitted were determined in accordance with FAC 17-4.05(4)(a), which sets construction permit fees based upon "potential emissions" from the source. Potential emissions as defined in 17-2.100(124) include the maximum capacity of a source to emit a pollutant under its physical and operational design. That design includes "Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment...". Since the emissions from the digester systems and evaporator will be collected and incinerated in the new No. 4 lime kiln, the potential emissions from those sources is less than 25 tpy and the appropriate fee is \$100 each. In the case of the No. 4 smelt dissolving tank, we do not feel that a \$1000 processing fee is appropriate since the potential emissions of TRS amount to less than 25 tpy. While that source does emit more than 100 tpy of particulate, it is already permitted for that emission. As shown in the application, we intend to install a scrubber in place of the existing demister as the control for both PM and TRS. As such, we are not required to submit a construction permit to replace the control device for PM, and are only required by the TRS rule to make that submission. Therefore, we feel that only the potential TRS emissions are applicable and the appropriate fee is again \$100.
- 8, 9. Based upon Mr. David Buff's (KBN Engineering) conversation with Mr. Bruce Mitchell of your staff, the information regarding the contemporaneous emission reductions from the existing lime kiln, lime slakers and lime bins presented in Attachment C of the No. 4 Lime Kiln permit application appears to provide the requested information. This information presents the basis for the estimated actual annual emissions from the existing sources which will be

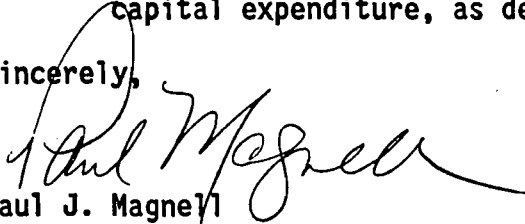
Mr. C. H. Fancy, P.E.  
December 17, 1987  
Page 3.

shutdown. Annual emissions were quantified because the significant emission rates for PSD new source review are expressed in terms of tons per year. Therefore, we saw no reason to present maximum hourly or daily rates. However, Mr. Mitchell also expressed a concern that our requested contemporaneous reductions for the lime slakers and lime bins not exceed the allowable emissions for which the existing system is permitted. All of the emission reductions from these sources were based upon the actual amount of lime processed in 1986 (149,968 TPY). The total amount of lime processed in 1986 includes 14,641 TPY of purchased lime. Thus, the two kilns produced 135,327 TPY of lime. In comparison, the existing No. 1 and No. 2 Kilns are permitted for a process input rate of 26,000 lb/hr and 32,000 lb/hr, respectively, or a total of 58,000 lb/hr. This equates to a total lime production rate of approximately 34,800 lb/yr, or 17.4 TPH. There are no restrictions upon operating hours, so that the total permitted capacity of the two kilns is 152,424 TPY. In addition, there are no restrictions upon the amount of purchased lime which can be handled by the lime slakers and lime bins.

This comparison shows that in no event do the documented contemporaneous reductions exceed the maximum rate and emissions for which the system is designed or permitted.


10. In regard to the existing sources for which applications have been submitted, there have been no physical changes or changes in the method of operation since September 24, 1976, except those excluded under the definition of "modification" under federal New Source Performance Standards, 40 CFR Part 60.14. Routine maintenance, repair, and replacement of component parts has occurred, as well as year-to-year variations in hours of operation and in production rates. Any production rate increases were accomplished without a capital expenditure, as defined in 40 CFR Part 60.

Sincerely,

  
Paul J. Magne  
General Manager

PJM/ma

Copied: Bruce Mitchell  
Pradeep Basal  
CHFB  
B. Stewart - NE Dist  
B. Pittman - Eq.

} 12.23.87 

ATTACHMENT 4

1-15-88

Fernandina Beach, FL



JSC/CCA

DER

JAN 19 / 1988

BAQM

JEFFERSON SMURFIT CORPORATION & CONTAINER CORPORATION OF AMERICA

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

CERTIFIED MAIL

January 15, 1988

Mr. Dale Twachtman, Secretary  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Twachtman:

Re: AC45-141871-73, 74, 75

This letter is pursuant to our conversations with Mr. Bruce Mitchell of your Department on January 13 and 15. Those conversations were in reference to our recently submitted motion for additional time in which to file a petition for formal proceedings pertaining to a letter of incompleteness received on December 12, 1987 regarding our applications for construction permits for various parts of our TRS control program.

Mr. Mitchell has indicated that the response which we have submitted to that letter of incompleteness is adequate and that the Department is now ready to deem the applications complete and issue draft permits for our review. However, Mr. Mitchell has indicated that the Department has determined that they cannot do so unless and until the motion for additional time in which to file a petition for formal proceedings has expired or been withdrawn.

Container Corporation of America has no intention of delaying the timely completion of the permitting process. In fact we are most anxious for that process to proceed as quickly as possible so that work may commence on this important project. In that light, and under the presumption that the Department's position and intentions are as Mr. Mitchell has represented to us, Container Corporation of America would hereby request that the aforementioned motion for additional time in which to file a petition for formal proceedings be withdrawn from Department consideration.

If there are any questions regarding this request, please contact Mr. Roger Hagan, Technical Director, at (904) 261-5551.

Sincerely,

*Paul J. Maguell*  
Paul J. Maguell  
General Manager

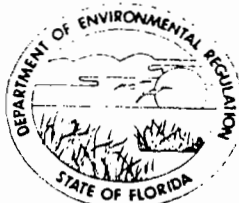
PJM/js

- cc: Mr. Steve Smallwood - FDER, Tallahassee
- Mr. Ernest Frey - FDER, Jacksonville
- Mr. Clair Fancy - FDER, Tallahassee
- Mr. Bruce Mitchell - FDER, Tallahassee

ATTACHMENT 5

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

January 22, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Magnell:

Re: Pre and Post Test to Establish SO<sub>2</sub> Control Efficiencies

It has become apparent in the review of the various permit applications received regarding the TRS NCG systems that the selected combustion devices and their associated control efficiencies for sulfur dioxide (SO<sub>2</sub>) are not established. Therefore, a pre and post test will be required to establish the SO<sub>2</sub> removal efficiency of each combustion device (e.g. lime kiln), which is currently operating and in which TRS emissions are proposed to be incinerated.

It is advised that you perform the pre-test at your next earliest convenience (e.g. annual compliance test). Please submit the test data to the Department's Bureau of Air Quality Management to review and to document the results for the file.

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

Sincerely,

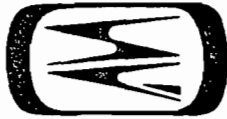
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/PR/s

cc: S. Smallwood  
J. Brown  
B. Thomas  
B. Pittman  
M. Zilberberg  
B. Stewart

ATTACHMENT 6





2-23-88  
FERNANDINA BEACH, FL  
**JSC/CCA**

JEFFERSON SMURFIT CORPORATION & CONTAINER CORPORATION OF AMERICA

DER-BAQM

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

February 23, 1988

**CERTIFIED MAIL**

Mr. Steve Smallwood  
Chief, Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Smallwood:

This is in reference to Container Corporation of America's submittal of a construction permit application for our new No. 4 lime kiln. This application has been assigned permit number AC 45-141877.

Pursuant to our conversation with Mr. Bruce Mitchell of FDER, we have been advised that the Department has questioned a portion of that permit application submittal. Specifically, the Department has called into question data submitted in Table A-1 of the application which summarizes the net emissions resulting from this project for the purpose of determining whether PSD review is required. That table includes an allowance for Particular Matter emissions due to kiln leaks from both the existing kilns and from the proposed new kiln.

We understand from Mr. Mitchell that the Department intends to disallow the allowances for kiln leakage from that analysis. We believe that the net emissions reductions shown in Table A-1 are proper and could be shown to be very conservative in practice. However, since the emissions from leakage is small in either case, and in the interest of expediency in resolving the permit applications and proceeding with this project, CCA will agree to drop kiln leakage from consideration for the existing as well as the proposed new source in this case.

We also are requesting at this time that the application be modified such that the hours of operation for the new kiln be reduced from 8760 hours/year to 8736 hours/year, or from 365 days/year to 364 days/year. In so doing, the adjusted date in Table A-1 shows that the PSD increment is not consumed for PM and PSD is not required.

As was also discussed with Mr. Mitchell, it is our understanding that the Department does not intend to consider PM-10 under PSD criteria at this time and, as such, a PSD review is not required for this project.

Mr. Steve Smallwood  
Page 2  
February 23, 1988

As we have stated previously, Container Corporation of America is vitally interested in expediting this most important project. To that end we have and will continue to work with the Department whenever necessary. We hope that, with this change, the Department is now prepared to move the permitting process ahead and issue draft permits for our TRS control project. If there are any further questions, please contact Roger Hagan at (904) 261-5551.

Sincerely,



Paul J. Magrell  
General Manager

PJM/js

cc: Mr. E. E. Frey - FDER, Jacksonville  
Mr. Clair Fancy - FDER, Tallahassee  
Mr. Bruce Mitchell - FDER, Tallahassee