

Presrow - 10/FO
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Patly ?
JRS
7-13-93

Jim,

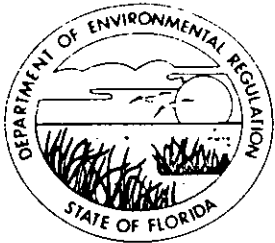
In regards to the February 27, 1991 Source Test Report for Jefferson Smurfit showing a higher than permitted sulfur dioxide emissions level (314.15 lb/hr vs. permitted level of 289.5 lb/hr), Dana Brown has relayed to us the following:

The higher than allowed level was a result of a lab problem involving proper titration to get the reading. Their office was aware of this problem and allowed them to retest.

In addition to the above, Jefferson- Smurfit is presently putting together a new compliance plan and is developing a new monitoring system. Their office will continue to monitor the facility for compliance.

John Brown
F.Y.I.
Jim P.
7/13

File Cgy



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 22, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Hollis H. Elder
General Manager
Jefferson Smurfit Corporation
Containerboard Mill Division
1915 Wigmore Street
Jacksonville, Florida 32201

Dear Mr. Elder:

Re: Request for Modification of a Specific Condition to the
Operation Permit No. AO 16-185036: No. 10 Coal/Bark Boiler

The Department has reviewed your letter received December 21, 1992, which requested an increase in the heat input from 441 MMBtu/hr to 540 MMBtu/hr. Based on a review of the files of the No. 10 Coal/Bark Boiler's construction permit, No. AC 16-33885, the following information is relevant to the proposal/request:

- o On February 3, 1991, construction permit No. AC 16-33885 was issued for the construction of the new No. 10 Coal/Bark Boiler; and,
- o Specific Condition No. 10 states that the maximum heat input to the boiler is limited to 441 x MMBtu/hr and was taken from the application package as a worst case firing scenario, which is 100% coal with no bark.

Due to the federally enforceable condition established in the construction permit for the maximum heat input of 441 MMBtu/hr, the condition cannot be changed through an operation permit amendment/modification in accordance with F.A.C. Rules 17-212.400(6)(b) and 17-212.500(8)(d)2., but will require a construction permit for a modification, which includes an evaluation of the pollutant emissions for reasonable assurance purposes and public notice of the Department's Intent. Therefore, in order to process your proposal, the following questions and information, including all assumptions, calculations and reference materials, is deemed necessary:

- o Please submit to the Department's Bureau of Air Regulation an application package for a modification along with the appropriate

Mr. Hollis H. Elder
Proposed Modification to AO 16-185036
January 22, 1993
Page 2

processing fee. The processing fee is to be based on the **net change** from the previous actual pollutant emissions to the proposed future allowables/potential pollutant emissions, in tons per year, and on the worst case pollutant. The previous actual emissions shall be as defined by F.A.C. Rule 17-296.200, which directs the calculation to be based on the average hours of the last two years of operation, but within the last five years if it can be shown that other years are more representative, times the actual pollutant emission rate (i.e., lbs/hr) and divided by the 2,000 lbs/ton. The future allowable/potential pollutant emissions shall be calculated by multiplying the proposed allowable pollutant emission rate (i.e., lbs/hr) times the desired annual hours of operation and divided by the 2,000 lbs/ton.

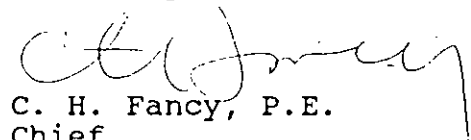
o Has the No. 10 Coal/Bark Boiler been physically modified or reconstructed since the original construction was completed and in accordance with the construction permit No. AC 16-33885? If so, please explain fully and provide details.

o Will the proposed modification (i.e., increase in Btu heat input to the No. 10 Coal/Bark Boiler) affect any source's operation or be associated with any source modification at the mill? If so, please explain fully and provide details. If there is any other modification occurring, then please submit the appropriate application package and processing fee.

o Please provide the summary performance specification sheet of the boiler as contracted with the manufacturer of the boiler.

Once the above information and responses have been received, the Department will resume processing the proposal. If there are any questions, please call Mr. Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,



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

CFH/BM/rbm

Attachment

cc: A. Kutyna, NED
J. Braswell, Esq., DER

R. Roberson, DCAQD
G. Tonn, JSC

Reading File

Clair Fany
John Brown
Preston Lewis
Bauer

1-22-93 RBM

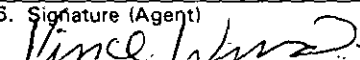
SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- If "Return Receipt Requested" on the mailpiece below the article number, Receipt Fee will provide you the signature of the person delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

Manager Jefferson Smurfit Corp. Containerboard Mill Division 1915 Wigmore Street Jacksonville, FL 32201	4a. Article Number P 062 922 024
5. Signature (Addressee)	4b. Service Type <input checked="" type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature (Agent) 	7. Date of Delivery 1-26-93 8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, November 1990 * U.S. GPO: 1991-287-068

DOMESTIC RETURN RECEIPT

P 062 922 024



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to Mr. Hollis Elder, Jefferson	
Street and No. Smurfit Corp. 1915 Wigmore Street	
P.O., State and ZIP Code Jacksonville, FL 32201	
Postage	\$
Certific Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 1-22-92 Permit: A016-185236	

PS Form 3800, June 1991



JEFFERSON SMURFIT CORPORATION

December 18, 1992

Containerboard Mill Division

1915 WIGMORE STREET

P.O. BOX 150

JACKSONVILLE, FL 32201

TELEPHONE: 904/353-3611

RECEIVED

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

DEC 21 1992

Division of Air
Resources Management

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Division of Air Resources Management
2600 Blairstone Road
Tallahassee, Florida 32399-2400

SUBJECT: NO. 10 COAL/BARK BOILER
PERMIT NUMBER AO16-185036
JEFFERSON SMURFIT CORPORATION
JACKSONVILLE MILL

Dear Mr. Fancy:

The purpose of this letter is to request a modification to the subject operation permit.

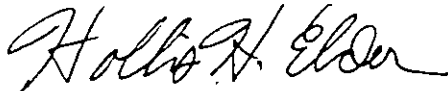
Specific Condition 12 of the operation permit provides that the maximum heat input shall be limited to 441×10^6 BTUs per hour of bark and coal. The heat input was a calculated number based on the combustion of 100% coal. In our operating experience, bark has become an important fuel, from an economical consideration as well as an environmentally sound use of a waste material. The combustion of bark is, however, less efficient than coal due to the moisture content and other factors and to yield sufficient BTUs to generate the required steam for the process, requires increased BTU input. In order to accommodate the increase in bark usage, we are requesting that Specific Condition 12 be modified to provide a maximum heat input of 540×10^6 BTU/hour.

Unfortunately, we believe we have exceeded the permitted fuel input rate, although we have demonstrated through the Continuous Emission Monitor System (CEMS) for SO_2 and NO_x that we comply with the emission limiting standards at a higher fuel input rate. We also have a stack test for particulate matter, SO_2 and NO_x which demonstrates we are well below the permitted emission limitation at a higher fuel input rate. We will coordinate with the Department in scheduling a stack test at the requested fuel input rate to demonstrate compliance with the current emission limitations. We are insuring that we do not currently exceed the specified firing rate until the permit is modified. This will not affect the rate of operation of the rest of the Mill since outside electric energy will be purchased for the difference until the permit is modified.

No. 10 Coal/Bark Boiler
Permit #AO16-185036
Jefferson Smurfit Corp.
PAGE 2

Accordingly, we would appreciate your expediting amending the permit to include the higher input rate and allow the facility to generate the energy that it requires by burning a higher proportion of bark. We are not asking for any change in the current emission limitations. If you have any questions regarding this, or need additional information, please let me know.

Very truly yours,



Hollis H. Elder
General Manager

CR# P 041 812 188

cc: Ernie Frey, P.E., DER
Andy Kutyna, P.E., DER
Ron Roberson, RESD