



Jefferson Smurfit Corporation

Telephone (904) 353-3611
Fax (904) 798-5700

Containerboard Mill Division
1915 Wigmore Street
P.O. Box 150
Jacksonville, FL 32201

By Fax - 850/922-6979
Hard Copy By
Certified - Return Receipt Requested

November 4, 1997

Mr. Alvarao A. Linero, P.E.
Administrator
New Source Review Section
Division of Air Resources Management
Florida Department of Environmental Protection
2400 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: No. 10 Coal/Bark Boiler
Jefferson Smurfit Corporation
Jacksonville Mill
DEP Permit No. AC 16-23453
File No. 0310356-002-AC

0310003-002-AC

Dear Mr. Linero:

This is in response to recent telephone conversations with the Department in regard to the facility's request to amend Specific Condition 10 of the subject permit to increase the firing rate of bark, and to allow firing of other carbonaceous fuels such as wood waste, yard waste, and wastewater treatment system sludge.

In the response of September 8, 1997, the facility withdrew wastewater treatment system sludge as a fuel to be included in the amendment request. In order to expedite the amendment request to increase the firing rate of bark, the facility, by this letter, withdraws the request to allow firing of other carbonaceous fuels. The requested amendment is now specifically requesting an increase in the firing rate of bark.

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The facility is specifically requesting that Specific Condition 10, page 6 of 9, be amended as follows:

From:

Only coal containing less than or equal to 1.0% sulfur by weight and bark shall be fired during normal operating conditions as a combined fuel in this boiler. The maximum heat input from the firing of coal and bark shall not exceed 397.0 MMBtu/hour and 143.0 MMBtu/hour, respectively, for a total maximum heat input from the combined fuel of 540.0 MMBtu/hour. No. 6 fuel oil may be fired during start-up, shut-down and malfunctions. Maximum coal fuel input shall be 30,600 lb/hr. Maximum bark fuel input shall be 35,000 lb/hr.

To:

Only coal containing less than or equal to 1.0% sulfur by weight and bark shall be fired during normal operating conditions as a combined fuel in this boiler. The maximum heat input from the firing of coal shall not exceed 397.0 MMBtu/hour, and from the firing of bark shall not exceed 162.0 MMBtu/hour. The total maximum heat input from the combined fuels shall not exceed 540 MMBtu/hour. No. 6 fuel oil may be fired during start-up, shut-down and malfunctions. Maximum coal fuel input shall be 30,600 lb/hr. Maximum bark fuel fuel input shall be 39,600 lb/hr.

Construction of the Mill's new chip receiving facility to receive wood chips produced in two off-site satellite chipping facilities has been completed. The two off-site satellite chipping facilities are providing the opportunity for additional bark for fuel input to the No. 10 Coal/Bark Boiler.

We urge the Department to favorably consider the requested amendment of Specific Condition 10 of the subject permit. The facility would appreciate a timely determination of this amendment request in order to take advantage of the opportunity for additional bark fuel.

Should there be any question about this matter please telephone Gene Tonn at 904/798-5662 or write to me at the above address.

Very truly yours,



Hollis H. Elder
Vice President & General Manager