



JEFFERSON SMURFIT CORPORATION

Rec'd  
Sept 9, 1997

Containerboard Mill Division

1915 WIGMORE STREET  
P.O. BOX 150  
JACKSONVILLE, FL 32201  
TELEPHONE: 904/798-5600  
FAX: 904/798-5700

Via Airborne Express

September 8, 1997

Mr. Alvaro 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  
Response to Request for Additional Information  
File No. 0310356-002-AC

0310003-002-AC

Dear Mr. Linero:

This is in response to the Department's request for additional information dated April 28, 1997 in regard to the facility's request of April 15, 1997 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.

The request for additional information and the facility's response is as follows:

1. Please indicate the input rate (lb/hr) for the new fuel. How will compliance be shown with this new mass rate.

Response: The maximum input rate of the carbonaceous fuel would not exceed 39,600 lb/hr. Compliance with the mass rate of carbonaceous fuel would be determined by calculation, knowing the heat input rate of coal and the steam generation rate of the boiler.

2. Provide the heating rate (MMBtu/hr) for the new fuel(s).

Response: The maximum heating rate of the carbonaceous fuels would be 162.0 MMBtu/hour.

3. Submit the composition of the sludge. How is the sludge being disposed now and how will the sludge be stored as a fuel? What will be the odor implications for sludge storage? What will be the ash content of the sludge and for the other fuel. What effect will the ash content have on the particulate emissions?

Response: At this time the facility is withdrawing wastewater treatment system sludge as a fuel to be included in the requested permit amendment. The ash content of the carbonaceous fuels (bark and other wood waste) would be expected to be nominally identical.

4. Please indicate why the bark fuel input rate be deleted for the new specific condition.

Response: A carbonaceous fuel input rate has been included in the revised Specific Condition 10 to follow.

Based on this additional information, 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 carbonaceous fuel shall be fired during normal operating conditions as a combined fuel in this boiler. Carbonaceous fuel shall include bark, or other wood waste. The maximum heat input from the firing of coal shall not exceed 397.0 MMBtu/hour, and from the firing of carbonaceous fuels 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 carbonaceous fuel input shall be 39,600 lb/hr.

Mr. Alvaro A. Linero, P.E.  
September 8, 1997  
Page 3

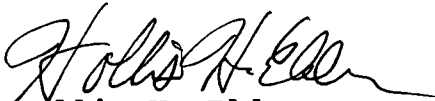
Amendment of Specific Condition 10 as requested is not expected to increase air emissions nor cause degradation of air quality.

A new chip receiving facility is being constructed in this facility to receive wood chips produced in off-site satellite chipping facilities. The wood chips are used in the pulping process. Because wood chips will be produced off-site, the existing on-site wood chipping facility is to be eliminated. The facility has been producing bark from the on-site chipping operation and also purchasing bark from other sources for use as a fuel in the No 10 boiler. The two off-site satellite chipping facilities are expected to increase the available supply of bark. Opportunities are also available for considering the firing of other carbonaceous fuels, such as wood waste. As use of carbonaceous fuel input is increased, the fossil fuel (coal) input will be decreased to comply with the proposed mass and heat input limitations of Specific Condition 10.

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 of the availability of the additional bark and other carbonaceous fuels.

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

CC: J. Ariz, BAR

C. Kitts, NED

R. Robinson, Duval Co

RECEIVED

SEP 09 1997

BUREAU OF  
AIR REGULATION