



Jefferson Smurfit Corporation

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Jacksonville, FL 32201

Certified - Return Receipt Requested

October 9, 1997

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BUREAU OF
AIR REGULATION

Mr. Syed Arif
Permitting and Standards 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. Arif:

This is in response to your recent telephone call in regard to the facility's response of September 8, 1997 to the Department's request of April 28, 1997 for additional information for 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.

Your recent telephone call enquired about the applicability of 40CFR Part 60, Subpart Eb - Standards of Performance for Municipal Waste Combustors for Which Construction is Commenced After September 20, 1994. Your concern was that firing yard waste in the subject boiler may trigger applicability of the above mentioned subpart.

I have reviewed Subpart Eb and have discussed this issue with David Buff of Golder and Associates, our air permits consultant, and with Terry Cole, our environmental attorney, and offer the following comments:

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It is not the intent of this facility to burn "yard waste" as defined in Subpart Eb, i.e. "grass, grass clippings, bushes, shrubs, and clippings from bushes and shrubs...". The intent is to burn "clean wood" which by definition in Subpart Eb "means untreated wood or untreated wood products including untreated lumber, tree stumps(whole or chipped), and tree limbs(whole or chipped)." "Clean Wood" by definition is not included in yard waste and is exempt from the definition of municipal solid waste in Subpart Eb.

The request to amend Specific Condition 10 of the subject permit to fire yard waste was in error based on definitions found in Subpart Eb.

More pertinent to this request in the definition of "Carbonaceous Fuel" as found in DEP Chapter 210.200(59) which defines carbonaceous fuel as "Solid materials composed primarily of vegetative matter such as tree bark, wood waste, or bagasse."

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, as defined in Chapter 210.200(59) and 40CFR Part 60 Eb. 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.

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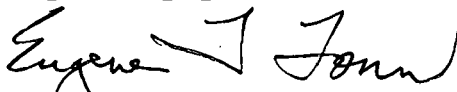
Amendment of Specific Condition 10 as requested is not expected to increase air emissions nor cause degradation of air quality.

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 clean 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 me at 904/798-5662 or write to me at the above address.

Very truly yours,



Eugene T. Tonn, P.E.
Senior Environmental Engineer

CR #P 057 118 897

File
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Duval Co.