



JEFFERSON SMURFIT CORPORATION

401 ALTON STREET, P.O. BOX 276
ALTON, ILLINOIS 62002-2276

618/463-6000

*Mech. Dept
Coff*

July 3, 1986

DER

Reply to: **Containerboard Mill Division**

1915 WIGMORE STREET
P.O. BOX 150
JACKSONVILLE, FL 32201
TELEPHONE: 904/353-3611

JUL 7 1986

BAQM

Mr. William A. Thomas, P.E.
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

**RE: PERMIT NUMBER AC16-095614
CAUSTICIZING SYSTEM**

Dear Mr. Thomas:

Jefferson Smurfit Corporation appreciated the opportunity on June 12, 1986 for Jerry Cox and Gene Tonn to discuss with you, Mr. Bruce Mitchell and Mr. Mike Harley, certain specific conditions of the construction permit for the company's new lime kiln and causticizing system now being constructed.

This letter requests modifications to certain specific conditions which we discussed with you and which we believe are appropriate.

1. Specific Conditions 2, 4 and 5 concern particulate emissions and test facilities for the lime silo. The lime silo is provided with a Mikro Pul dry dust collector, or baghouse, for control of dust emissions while purchased lime or manufactured lime is conveyed to storage in the silo. The baghouse exhaust is expected to emit less than one ton per year of particulate to the atmosphere. The physical location and arrangement of the baghouse makes permanent test facilities as required by Specific Condition 2 unreasonable and impractical. Because the source is located in a particulate nonattainment area, it is subject to a 5% opacity requirement pursuant to Rule 17-2.650 (2)(c) 11.b.(i). Rule 17-2.700(3)(d) permits the Secretary or the District Manager of the District in which a minor particulate source equipped with a baghouse is located to waive the compliance test requirements for such source in Rule 17-2.700, Table 1, and specify an alternative standard of 5% opacity. The Company requests that the Secretary waive the compliance test requirements for the baghouse as provided in Specific Condition 4 and specify the alternative standard of 5% opacity pursuant to Rule 17-2.700(3)(d). The Company requests that Specific Condition 2 be modified by deleting "and lime silo" in line 1 and that Specific Condition 4 be deleted in its entirety.

not pertinent

2. Specific Condition 8 provides a "not to exceed" particulate matter emissions expressed as a mass emission in lb/hr and TPY. The NSPS standard for particulate emissions from lime kilns is expressed as a concentration corrected to 10 percent oxygen, as provided in Specific Condition 7. Establishing a mass emission standard as provided by Specific Condition 8 is inappropriate. The Company requests that Specific Condition 8 be deleted and suggests that the mass emission rate be shown in parentheses in Specific Condition 7 as an equivalent to the NSPS standard.
3. Specific Condition 10 provides a "not to exceed" total reduced sulfur emissions expressed as a mass emission in lb/hr and TPY. The NSPS standard for total reduced sulfur emissions from lime kilns is expressed as a concentration corrected to 10 percent oxygen, as provided in Specific Condition 9. Excess emissions of total reduced sulfur are determined on a daily basis 12-hour average TRS concentrations for the two consecutive periods of each operating day (40 CFR 60.284(c)(1) and (d)(2)). Establishing a mass emission standard as provided by Specific Condition 10 is inappropriate. The Company requests that Specific Condition 10 be deleted and suggests that the mass emission rate be expressed in Specific Condition 9 as an equivalent to the NSPS standard considering the 12-hour averaging period.
4. Specific Condition 12 provides a sulfur dioxide limitation and a test requirement. The Company does not object to a one-time test to provide the SO₂ mass emission rate for verifying PSD review. The Company requests that Specific Condition 12 be stated as a one-time compliance test requirement.
5. The lime kiln is operated to produce lime and the production of lime is regulated by Specific Condition 18. Fuel will be utilized as efficiently as possible. The quantity of fuel used will be determined by the quantity of fuel required to produce the quantity of lime allowed by the permit. The Company believes that a fuel limitation as provided in Specific Condition 17 may limit the production of lime to less than the permitted lime production capacity. The Company believes that a fuel limitation is inappropriate and requests that the fuel input limitation be deleted from Specific Condition 17. The Company has no objection to reporting the amount of fuel used.
6. Specific Conditions 6, 17 and 18 require reporting purchased lime, fuel, and lime production on a per month basis in the Annual Operating Report to be submitted to the BESD. The Company has no objection to

Fuel limit is the only one being at max potential of the lime. The permit will be a credit and a supply of emissions (see 2) & lime production.

Mr. William A. Thomas, P.E.
Bureau of Air Quality Management
July 3, 1986
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reporting these values on an annual basis, but fails to understand of what value the per month basis values would be to the agency. Because of the additional reporting burden, the Company requests that the per month basis be deleted from these specific conditions.

7. Specific Condition 19 provides a limitation of purchased lime to the silo not to exceed 6.00 tons per hour and 2,920 tons per year. The Company, in testing the lime silo system has determined that purchased lime can be unloaded at a rate of about 15 tons per hour. Because the input of lime to the silo is regulated by a 5% opacity limitation, it appears appropriate that the input may be any value that does not cause an exceedance of the opacity requirement. The Company therefore requests that if a "maximum not to exceed" input to the lime silo is necessary, the value be modified from 6.00 tons per hour to 15.00 tons per hour. The Company believes that the 2,920 tons per year limitation of purchased lime input is too restrictive, and that an annual limitation in itself is unnecessary if a per hour limitation is specified. The Company therefore requests that the per year limitation in Condition 19 be deleted. *emissions?*
8. Specific Condition 20 provides operating conditions to be satisfied when demonstrating compliance with the permitted emission rates. The operating conditions specified in Specific Condition 20 are based on design criteria or design values. The Company believes that it may be impossible to satisfy the operating conditions specified in Specific Condition 20 during the compliance test, given the fact that there are three variable conditions. Based on the discussion on this issue, it is the Company's understanding: that the compliance test may be conducted at the maximum operating conditions which can be achieved, that the compliance test report will include the operating conditions at which the test was performed and it may then be appropriate to amend the construction permit, and that failure to satisfy precisely the operating conditions specified in Specific Condition 20 would not in itself be reason to invalidate the compliance test. The Company requests that the BESD be made aware of this understanding for the benefit of BESD compliance test observers.

As a clarification from the discussion, the provisions of Specific Condition 20.b. would apply only if and when gaseous fossil fuel becomes a fuel to be used in firing the lime kiln.

9. The provisions of Specific Condition 21 were clarified in our discussion that "at the same time" is not intended to be interpreted as "simultaneously" or "concurrently." Any emission test required on the lime silo would be performed within a reasonable time, such as within a week, of the emission test performed on the lime kiln.

10. Specific Condition 23 provides that there be no venting of the TRS emissions from the multiple effect evaporator at any point between the multiple effect evaporator and the lime kiln except in an emergency or for essential maintenance, and for the development of a contingency plan for such circumstances. The Company believes that the provisions of this condition are more appropriate to the operating permit for the multiple effect evaporator (Permit Number A016-102189) because the multiple effect evaporator is the source of the TRS gases subject to control. Specific Conditions 9, 10, 11 and 12 of the multiple effect evaporator permit all provide requirements which concern incineration of the TRS gases. The Company believes it is at risk of potential violation of two permits with circumstances of venting which are not permitted by permit conditions, if both the lime kiln permit and the multiple effect evaporator permit have provisions regulating incineration of the TRS gases. The Company therefore requests that the provisions of Specific Condition 23 become provisions of a specific condition in Permit Number A016-102189, the operating permit for the multiple effect evaporator. As agreed during the discussion of June 12, 1986, a copy of this permit is enclosed.

The Company suggests that it may be appropriate to include in the lime kiln permit a specific condition referring to the specific condition requested for the multiple effect evaporator. The Company requests that such condition in the lime kiln permit be for reference purpose only.

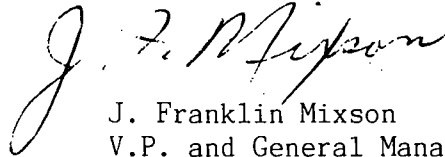
11. Specific Condition 26 provides that an operation and maintenance plan be prepared for the lime kiln and lime silo and submitted to the department pursuant to Rule 17-2.650(2)(g). Rule 17-2.650(2)(g) provides that a permit "specify an operation and maintenance plan" but does not, according to the Company's interpretation, require submission to the Department. Based on the discussion, it is our understanding that the Department will review this provision with the Office of General Counsel and advise the company of the results of the review. The Company requests that Specific Condition 26 be modified to provide for preparation of an operation and maintenance plan which will be available for inspection at the source.
12. Specific Condition 39 provides that concurrent compliance tests be performed for a source which has both a visible emissions and a particulate emission standard. Because there are circumstances beyond an operator's control which could prevent concurrent tests, the Company requests that this condition be deleted.

Mr. William A Thomas, P.E.
Bureau of Air Quality Management
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13. Specific Condition 40 provides that all TRS emissions to be incinerated in the lime kiln will be diverted to the existing power boiler during outages of the lime kiln system. Because the Company has discovered new and additional information from operating experience of other mills; information indicating that injecting TRS gases of low volume-high concentration into a TRS gas system of high volume-low concentration may present a risk to property and life. The concern for an alternate control for the TRS emissions will be addressed in Specific Condition 23 which requires development of a contingency plan for circumstances not allowing incineration of TRS emissions in the lime kiln. Because Specific Condition 40 is redundant and because it is not appropriate for the Department to specify a control method, the Company requests that Specific Condition 40 be deleted.

Jefferson Smurfit Corporation appreciates your consideration of our discussion and the requests we are submitting. If you have any questions, please telephone Jerry Cox or Gene Tonn at 904/353-3611.

Very truly yours,



J. Franklin Mixson
V.P. and General Manager
Jefferson Smurfit Corporation
Jacksonville Mill

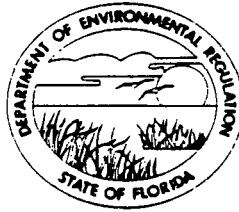
JFM/nml

cc: Mr. Bruce Mitchell, DER BAQM ✓
Mr. Mike Harley, DER BAQM

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
G. DOUG DUTTON
DISTRICT MANAGER

November 12, 1985

Mr. J. Franklin Mixson
Vice President and General Manager
Alton Packaging Corporation
Post Office Box 150
Jacksonville, Florida 32201

Dear Mr. Mixson:

Duval County - AP
Alton Packaging Corporation
Multiple Effect Evaporator (MEE)

Attached is Permit No. AO16-102189. Should you object to the issuance of this permit or the specific conditions of the permit, you have a right to petition for a hearing pursuant to the provisions of Section 120.57, Florida Statutes.

The petition must be filed within fourteen (14) days from receipt of this letter. The petition must comply with the requirements of Section 17-103.155 and Rule 28-5.201, Florida Administrative Code, (copies attached) and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32301. Petitions which are not filed in accordance with the above provisions are subject to dismissal by the Department.

In the event a formal hearing is conducted pursuant to Section 120.57(1), 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 or hearing officer's recommended order, and to be represented by counsel.

If an informal hearing is requested, 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, pursuant to Section 120.57(2), Florida Statutes.

Sincerely,

Frank Watkins, Jr., P.E.
District Engineer

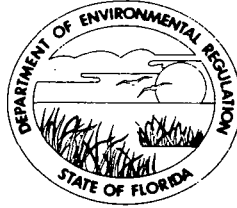
FW:vk

cc: Jacksonville BES

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER

Permittee:	REVISED:	October 21, 1985
	I.D. Number:	31-16-0003-10
Alton Packaging Corporation	Permit/Certification Number:	A016-102189
P. O. Box 150	Date of Issue:	June 25, 1985
Jacksonville, Florida 32201	Expiration Date:	May 31, 1990
	County:	Duval
	Latitude/Longitude:	30:22:00/81:37:30
	UTM:	E-7439.500 N-3359.100
	Project:	Multiple Effect Evaporator (MEE)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 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 operation of the Multiple Effect Evaporator System. Total reduced sulfur emissions shall be controlled by incineration in the No. 1 and/or No. 2 lime kiln.

Emission point(s) shall be as follows:

<u>Pt. No.</u>	<u>Source</u>
10	Multiple Effect Evaporator

Located at 1915 Wigmore Street, Jacksonville, Florida 32205

Supporting documents shall be as follows:

- (1) Permit renewal application received March 29, 1985
- (2) Permit A016-30969 and all attachments

PERMITTEE:

Alton Packaging Corporation

REVISED:

I.D. Number:

Permit/Certification Number:

Date of Issue:

Expiration Date:

October 21, 1985

31-16-0003-10

A016-102189

June 25, 1985

May 31, 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 therefor 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.
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

REVISED:

October 21, 1985

PERMITTEE:

Alton Packaging Corporation

I.D. Number:

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June 25, 1985

Expiration Date:

May 31, 1990

b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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 non-compliance 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)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - (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.
 - 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.

Permittee:
Alton Packaging Corporation

REVISED:
I.D. Number:
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Date of Issue:
Expiration Date:

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SPECIFIC CONDITIONS:

1. Permittee shall notify the Bio-Environmental Services Division (BESD) fifteen (15) days prior to source testing. Copies of the test report(s) shall be submitted to BESD within forty-five (45) days after completion of testing.
2. Testing of emissions shall be accomplished at a minimum of 90% of the permitted capacity. If testing is performed at a rate less than 90% of the permitted capacity, operation shall be limited to a maximum of 110% of the tested capacity until such time as an acceptable test is performed at a minimum of 90% of the permitted capacity. When operation is restricted to a lower capacity because of testing at such a level, BESD, upon advanced notification, will allow operation at higher capacities if such operation is for demonstrating compliance at a higher capacity.
3. Any revision(s) to a permit (and application) shall be submitted and approved prior to implementing.
4. Control equipment shall be provided with a method of access that is safe and reasonably accessible. Stack sampling ports and/or platforms shall not be required.
5. Permittee shall submit an annual operation report to BESD for this source on the form supplied for each calendar year on or before March 1.
6. The applicable emission limiting rules shall be as follows:

<u>PT. NO.</u>	<u>POLLUTANT</u>	<u>1FAC</u>	<u>2JEPB</u>	<u>OTHER</u>
10	Total Reduced Sulfur	17-2.660	2.208	40CFR Part 60- NSPS, Subpart BB Section 60.283 (a)(1)(iii)

Permittee:
Alton Packaging Corporation

REVISED:
I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

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7. The allowable emissions shall be as follows:

<u>PT. NO.</u>	<u>POLLUTANT</u>	<u>lbs/hr</u>	<u>T/yr</u>	<u>OTHER</u>	<u>OPACITY</u>
10	Total Reduced Sulfur	(see specific condition 10)			

8. Operation shall be limited to 8760 hours per year.

9. The process input rate of the Black Liquor Oxidation System (BLOX) shall be limited to a maximum of 120,070 pounds per hour dry weight of Black Liquor solids.

10. Gases from the MEE shall be vented to the No. 1 (APIS No. 31-16-0003-06) and/or No. 2 (APIS No. 31-16-0003-07) Lime Kilns and combusted by being subjected to a minimum temperature of 1200° F for a minimum of 0.5 seconds.

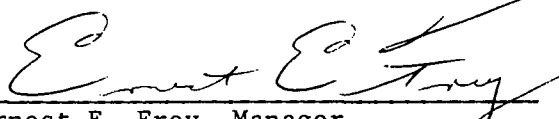
11. Records of the occurrence and duration of any startup, shutdown, or malfunction condition of the lime kiln(s) while combusting the MEE gases shall be maintained for a minimum period of two (2) years in accordance with 40 CFR Part 60, Section 60.7. These records shall be made available for inspection by BESD upon request.

Issued this 25th day of June, 1985

City of Jacksonville
Bio-Environmental Services Division

State of Florida
Department of Environmental Regulation


Donald C. Bayly, Division Chief


Ernest E. Frey, Manager
Northeast District

¹FAC---Florida Administrative Code

²JEPB--Jacksonville Environmental Protection Board

Permittee:
Alton Packaging Corporation

REVISED:
I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

October 21, 1985
31-16-0003-10
A016-102189
June 25, 1985
May 31, 1990

This is to certify that this document was mailed to the applicant, interested parties or their attorneys, and persons who have requested in writing notice of the agency's action or proposed action before the close of business on the date indicated below:

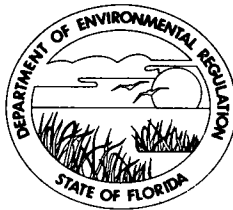
Date: 11/13/85

Ernest King
Signature

POST
Ernest King 11/13/85

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

October 23, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. J. Franklin Mixson
Vice President
Jefferson Smurfit Corporation
Jacksonville Mill
1915 Wigmore Street
Jacksonville, Florida 32206

Dear Mr. Mixson:

Re: Rule Applicability Determination for No. 10 Power
Boiler (AC 16-33885) Proposal

The department has received and reviewed your letter and attachments dated September 18, 1986, requesting a rule applicability determination on your proposal for the No. 10 Power Boiler. Based on the reviews of your letter and attachments and the construction permit file, the following information is offered:

- 1) On September 29, 1980, Mr. Edward M. Pyatt responded to the department's incompleteness letter dated September 15, 1980. In two of the responses, specifically Items #2 and #6, it was stated that there would be no increase in SO₂ emissions over the existing present boiler system and that it was the applicant's intent to accept the SO₂ emissions limitation of 289.5 lbs/hr for permit review purposes, respectively.
- 2) The Technical Review and Preliminary Determination write-up (TE & PD), which is dated December 18, 1980, contained references to the SO₂ emissions limitation of 289.5 lbs/hr. Also, the draft construction permit, which accompanied the TE & PD, contained the SO₂ emissions limitation in Specific Condition No. 10.
- 3) Public Notice of the department's Intent to Issue was published in The Florida Times Union on December 31, 1980.
- 4) The Final Determination was written after the required 30-day Public Notice comment period had been completed. The

Mr. J. Franklin Mixson
Page Two
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construction permit, No. AC 16-33885, was issued on February 3, 1981. The permit contained the SO₂ emissions limitation of 289.5 lbs/hr in Specific Condition No. 10, which is federally enforceable.

The above referenced information shows that the permittee had requested and received a federally enforceable emissions limitation for SO₂ to avoid review pursuant to the rules of PSD. Based on this and the proposal for the No. 10 Power Boiler, the following rules are appropriate:

- 1) FAC Rule 17-2.500(2)(g): PSD - Relations of Restrictions on Pollutant Emitting Capacity

"If a previously permitted facility or modification becomes a facility or modification which would be subject to the NSR requirements of this section if it were a proposed new facility or modification solely by virtue of a relaxation in any federally enforceable limitation on the capacity of the facility or modification to emit a pollutant (such as a restriction on hours of operation), which limitation was established after August 7, 1980, then at the time of such relaxation the NSR requirements of this section shall apply to the facility or modification as though construction had not yet commenced on it."

- 2) 40 CFR 52.21(r)(4): PSD - Source Obligation

"At such time that a particular source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements or paragraphs (j) through (s) of this section shall apply to the source or modification as though construction had not yet commenced on the source or modification."

Consequently, the following conclusions are offered:

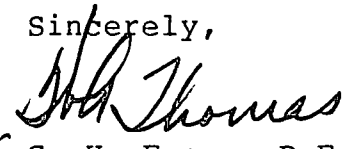
"If the permittee, today, requests a modification to the No. 10 Power Boiler in which the SO₂ emissions increase is significant pursuant to FAC Rule 17-2.500 Table 500-2, then:

Mr. J. Franklin Mixson
Page Three
October 27, 1986

- 1) The source's SO₂ emissions would be subject to review in accordance with FAC Rule 17-2.500, PSD Review.
- 2) Based on #1, the source's emission limiting standards would be in accordance with FAC Rule 17-2, Part VI - Emission Limiting and Performance Standards, which includes:
 - o 17-2.600 - Specific Source Emission Limiting Standards;
 - o 17-2.630 - Best Available Control Technology (BACT); and,
 - o 17-2.660 - Standards of Performance for New Stationary Sources (NSPS).
- 3) The procedures for making a determination of BACT for SO₂ are contained in FAC Rule 17-2.630, which would include the consideration of the proposed NSPS Subpart Db, since its effective date is June 19, 1986, as published in the Federal Register, Vol. 51, No. 118."

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

Sincerely,

for 

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

CHF/BM/s

cc: J. Cobb
J. Woosley
B. Miller
J. Cox
G. Tonn
D. Buff

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

February 6, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jerry B. Cox
Technical Department Manager
Alton Packaging Corporation
P.O. Box 150
1915 Wigmore Street
Jacksonville, Florida 32201

Dear Mr. Cox:

RE: Amendment to the Air Source Construction Permit:
AC 16-33885

The department is in receipt of your letter to Duval County's Bio-Environmental Services, which requested an amendment to the above referenced permit. The request was to allow the use of EPA Method 25A for compliance testing of VOC in lieu of using EPA Method 25, as required in Specific Condition No. 5.

As this is an NSPS source, the bureau wrote to USEPA Region IV for advisement on the matter. Based on their response, the bureau can grant your request and the following shall be changed and added:

Specific Condition:

No. 5:

From: Before the construction permit expires, the proposed boiler shall be sampled for pollutant emissions. Test procedures will be EPA reference Methods 1, 2, 3, 5, 6, 7, 9, 10, and 25 as described in 40 CFR 60, Appendix A or other state approved methods.

Mr. Jerry B. Cox
Page Two
February 6, 1985

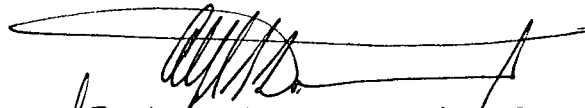
To: Before the construction permit expires, the proposed boiler shall be sampled for air pollutant emissions. Test procedures will be EPA reference Methods 1, 2, 3, 5, 6, 7, 9, 10, and 25A, as described in 40 CFR 60, Appendix A or other state approved methods.

Attachments to be incorporated are:

4. Jerry B. Cox's letter, dated April 2, 1984.
5. Jerry E. Woosley's letter with enclosure, dated April 11, 1984.
6. C.H. Fancy's letter with attachment, dated July 2, 1984.
7. James T. Wilburn's letter, dated July 23, 1984.

This letter must be attached to your construction permit, No. AC 16-33885, and shall become a part of that permit.

Sincerely,


for Victoria J. Tschinkel
Secretary

VJT/rw

cc: Jerry E. Woosley
John Brown
James T. Wilburn
Dan Thompson

ATTACHMENT 4

Tutt → Hankins → Woolley
Pl. prepare report



ALTON PACKAGING CORPORATION
A member of the Jefferson Smurfit Group

Jacksonville Containerboard Mill
1915 Wigmore Street
P. O. Box 150
Jacksonville, Florida 32201
Telephone 904/353-3611

April 2, 1984

Mr. Robert S. Pace, P.E.
Bio-Environmental Engineer
Department of Health, Welfare &
Bio-Environmental Services
515 West 6th Street
Jacksonville, Florida 32206-4397

COPY

RE: Construction Permit No. AC-16-33885

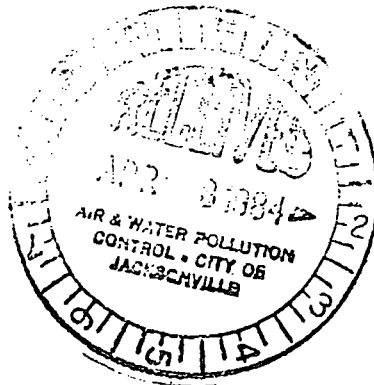
Dear Mr. Pace:

Alton Packaging Corporation requests that Method 25A be substituted for Method 25 in the above referenced permit for compliance testing of VOC.

Sincerely yours,

Jerry B. Cox
Technical Department Manager

JBC/nml



ATTACHMENT 5

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division
Air and Water Pollution Control

April 11, 1984



DER

APR 12 1984

BAQM

Mr. Clair Fancy, P.E.
Bureau of Air Quality Management
Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blairstone Road
Tallahassee, Florida 32301

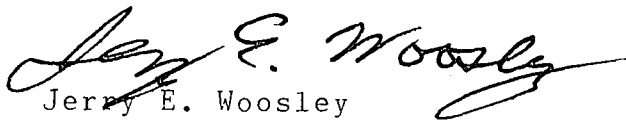
Re: Alton Packaging Corporation
Permit AC16-33885
Coal/Bark Boiler

Dear Mr. Fancy:

Enclosed is the captioned source's request to modify the permit testing requirement for VOC. Bio-Environmental Services Division supports the request because Method 25A is more suitable for this type of source.

If this Agency may be of further assistance, please advise.

Very truly yours,


Jerry E. Woosley
Assistant Engineer

JEW/vj
Enclosure

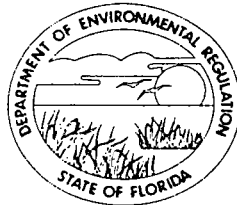
cc: Mr. Doug Dutton - DER, without enclosure
cc: Mr. Jerry Cox - Alton Packaging, without enclosure



ATTACHMENT 6

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

July 2, 1984

Mr. James T. Wilburn, Chief
Air Management Branch
USEPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Request to Use EPA Method 25A

Dear Mr. Wilburn:

The department has received a request from Alton Box Board (see attachment) to use EPA Method 25A instead of EPA Method 25 to test for VOC. Would you have someone in your staff review and comment on this request and advise us as soon as possible.

If there are 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/BM/s

cc: Nancy Wright
Doug Dutton
Jerry Woosley

ATTACHMENT 7

DER

JAN 22 1985

BAQM

JUL 28 1984

4AW-AM

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Department of Environmental
Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Mr. Fancy:

This letter is in reply to yours of July 2, 1984, concerning VOC emissions testing at the Alton Packaging Corporation's 441 HMBTU/HR bark/coal boiler located at their Alton Box Board Company in Jacksonville, Florida. The company's specific request is that they be allowed to use Method 25A as contained in 40 CFR 60 Appendix A, in lieu of Method 25 as specified in condition number 5 of the FDER Permit No. AC-16-33885.

Method 25A should provide more reproducible results, in this case, than would Method 25 since the combustion source in question is controlled by a wet scrubber. Although our experience has shown that for this particular type of source the Method 25A results will probably be biased low, Method 25A is still the best choice of testing procedures.

If you have further questions in this matter, please contact Mr. Joe Riley, of my staff at 404/881-4901 or PTS 257-4901.

Sincerely yours,

James T. Wilburn, Chief
Air Management Branch
Air & Waste Management Division

FILE NO. 10.9.5

4AW-AM
RILEY

4AW-AM
BEALS

4AW-AM
BASKERVILLE

4AW-AM
SMITH

4AW-AM
WILBURN

Riley/EXM/X-4901/7-17-84/C-30