



# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

**Permittee:**  
International Paper Company  
Pensacola Mill  
Post Office Box 87  
Cantonment, FL 32533-0087

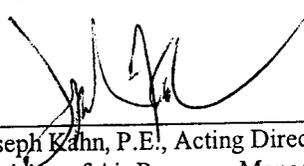
**Permit No.:** 0330042-007-AC  
**Facility ID No.:** 0330042  
**SIC Nos.:** 26; 2611  
**Expiration Date:** April 30, 2005  
**Project:** Physical modification of the Kamyrdigester System; addition of a new causticizer with piping; and, installation of 2 medium consistency pumps for the Pine O<sub>2</sub> Delignification and Bleach Plant area

This permit is issued for the following: 1) physical modification of the Kamyrdigester System; 2) addition of a new causticizer with piping to the causticizing/lime production operations; and, installation of 2 medium consistency pumps for the Pine O<sub>2</sub> Delignification and Bleach Plant area. Actual production limitations are being established to effect no changes in actual emissions and are based on calendar years 1998 and 1999. These changes will occur at the existing International Paper Company - Pensacola Mill located at 375 Muscogee Road, Escambia County. UTM Coordinates: Zone 17; 469.0 km East; and, 3386.0 km North; Latitude: 30° 36' 30" North; and, Longitude: 87° 19' 13" West.

**STATEMENT OF BASIS:** This air construction permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. 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 permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**  
Title V Air Operation Permit Revision No. 0330042-005-AV  
Air Construction Permit No. 0330042-006-AC

**Documents on file with the Department:**  
Application request received April 22, 2003  
Supplemental Information received via e-mail on May 30, 2003, from Mr. Jim Spahr  
Letter with enclosures received July 3, 2003, from Ms. Nicki Slusser

  
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Joseph Kahn, P.E., Acting Director  
Division of Air Resource Management

JK/sms/bm

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**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither 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 is not 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 this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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 and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - (a) Have access to and copy any records that must be kept under conditions of the permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
  - (c) Sample or monitor any substances or parameters at any location reasonable 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 provide the Department with the following information:
  - (a) A description of and cause of noncompliance; and,
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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 for 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 involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120, F.A.C., 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 or a copy thereof shall be kept at the work site of the permitted activity.
14. The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five (5) years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    - 1. the date, exact place, and time of sampling or measurements;
    - 2. the person responsible for performing the sampling or measurements;
    - 3. the dates analyses were performed;
    - 4. the person responsible for performing the analyses;
    - 5. the analytical techniques or methods used; and,
    - 6. 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 the 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 corrected promptly.  
[Rule 62-4.160, F.A.C.]

**SPECIFIC CONDITIONS:**

- A. General.** Title V Air Operation Permit, No. 0330042-005-AV, and air construction permit, No. 0330042-006-AC, are incorporated by reference, except for the following changes.
- B. Kamyr (Continuous) Digester System (KDS).**
- 1. Production from the KDS shall not exceed 271,985 air dried tons bleached pulp per year nor 293,744 air dried tons unbleached pulp per year [based on the average of calendar years (CYs) 1998 and 1999].  
[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]
  - 2. For the construction/modification of the KDS to replace the existing extraction screens with diagonal extraction screens.

**C. Causticizing Operations.**

1. Lime production shall not exceed 155,108 tons CaO (calcium oxide) per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – PTE, F.A.C.]

2. For the construction of a new causticizer body and support piping.

**D. Pine O<sub>2</sub> Delignification and Bleach Plant.**

1. Bleach Plant production shall not exceed 245,030 oven dried tons pulp per year, for the A Bleach Plant Line (softwood), nor 239,677 oven dried tons pulp per year, for the B Bleach Plant Line (hardwood) [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – PTE, F.A.C.]

2. For the installation of two (2) medium consistency pumps in the Pine O<sub>2</sub> Delignification and Bleach Plant area.

**E. Batch Digester System (BDS).**

1. Production from the BDS shall not exceed 266,042 air dried tons bleached pulp per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

**F. Recovery Boiler (RB) Operations (Nos. 1 and 2).**

1. Black liquor solids firing in the RB Operations (Nos. 1 and 2) shall not exceed 941,560 tons per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

**G. Miscellaneous**

1. PSD Applicability – Phased Project. Based on the application for the above referenced new emissions unit construction and physical modifications to existing emissions units, International Paper Company has acknowledged that this permitting action addresses only Phase I of a phased project. The Phase II permitting action shall include the impact of the above referenced permitting action and their associated potential pollutant emissions changes as if never constructed or modified.

[Application received April 22, 2003; and, Rule 62-212.400(2)(g), F.A.C.]



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

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7/3/03  
Koo  
7/3/05

## P.E. Certification Statement

**Permittee:**  
International Paper Company  
Pensacola Mill

**Draft Permit No.:** 0330042-007-AC

**Project type:** Air Construction Permit

*I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).*

Scott M. Sheplak      06/09/03  
Scott M. Sheplak, P.E.      date  
Registration Number: 48866

Permitting Authority:  
Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/921-9532  
Fax: 850/922-6979

**TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION**

**RECEIVED**  
JUL 01 2003  
**NORTHWEST FLORIDA**  
**NFD**

International Paper Company  
Pensacola Mill  
**Facility ID No.:** 0330042  
Escambia County

**Air Construction Permit No.:** 0330042-007-AC

Permitting Authority:  
State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Telephone: 850/488-0114  
Fax: 850/922-6979

Compliance Authority:  
Department of Environmental Protection  
Northwest District  
160 Government Center  
Pensacola, Florida 32501-5794  
Telephone: 850/595-8364  
Fax: 850/595-8096

## **1. APPLICATION INFORMATION.**

### **1.1. Applicant Name and Address:**

International Paper Company  
Pensacola Mill  
375 Muscogee Road  
Cantonment, Florida 32533-0087

### **1.2. Reviewing and Process Schedule:**

Date of Receipt of Application: April 22, 2003

## **2. FACILITY INFORMATION.**

### **2.1. Facility Location**

The International Paper Company - Pensacola Mill is located at 375 Muscogee Road, Escambia County, Florida.  
The UTM: coordinates of this facility are: Zone 17; 469.0 km East; 3386.0 km North.

### **2.2. Standard Industrial Classification Code (SIC):**

Major Group No.	26	Paper and Allied Products
Group No.	261	Pulp Mills
Industry No.	2611	Pulp Mills

### **2.3. Facility Category**

The International Paper Company - Pensacola Mill is classified as a major air pollutant emitting facility. This facility is on the list of the 28 Major Facility Categories, Table 62-212.400-1. This facility is classified as a Title V Source.

## **3. PROJECT DESCRIPTION.**

The permitting authority has determined that an air construction permit is required in order to construct some new emissions units, which include the following: installation of a new causticizer body and associated piping; the installation of "diagonal" extraction screens in the continuous digester for improved downflow cooking; and, the replacement of two (2) medium consistency pumps in the Pine O<sub>2</sub> Delignification and Bleach Plant area. Additional permitting will be required to accommodate an increase in pulp production for an additional 150 air dried bleached pulp tons per day. However, the mill will be capped to the average of two previous years, specifically 1998 and 1999, of actual production in the areas affected to avoid PSD preconstruction review under New Source Review (NSR) pursuant to Rule 62-212.400(5), Florida Administrative Code (F.A.C.). The assumption is that, with no increase in actual production, there will be no increase in actual emissions. Therefore, the new construction will be considered to be a minor change to a major facility pursuant to Rule 62-212.400(2)(d)4.b., F.A.C.

The permitting authority intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that the construction and operation of the affected emissions units will not adversely impact air quality and will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

## **4. RULE APPLICABILITY.**

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

In accordance with Rule 62-204.340(1), F.A.C., this facility is located in an area (Escambia County) designated as attainment for all pollutants. The proposed project is subject to permitting under Rule 62-212.300, F.A.C., Permits Required.

**5. SOURCE IMPACT ANALYSIS.**

**5.1. Control Technology Review:**

There is no control technology review required.

**5.2. Air Quality:**

Based on the request, no air quality analysis is required and this proposed activity should not cause a violation of any air quality standard or increment.

**6. CONCLUSION.**

Based on the foregoing technical evaluation of the application submitted by the International Paper Company - Pensacola Mill, the Department has made a preliminary determination that the proposed project will be in compliance with all applicable state and federal air pollution regulations. The General and Specific Conditions are provided in the attached Draft Permit.

Permit Engineer: Bruce Mitchell

Reviewed and Approved by Scott Sheplak, P.E.