

PERMITTEE:

Champion International Corporation
Pensacola Mill

AIRS I.D. Number: 0330042
Air Permit Number: 0330042-003-AC
Emission Unit: 044
Date of Issue: June 30, 1997
Expiration Date: June 30, 2002
County: Escambia
Project: Alkaline Conversion Project

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 62-4, 62-210, 62-296 and 62-297. The above named applicant, hereinafter called 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:

Construction of the Alkaline Conversion Project: install equipment to change additives and fillers used in papermaking to alkaline-based papermaking. The equipment to be installed is a starch storage silo, a clay storage silo and a winder dust collection system. The winder dust collection system may be built at a later date if alkaline additives offdust from paper winding operation becomes a problem, so it is included in this permit. Each source will be controlled by its own fabric filter dust collector. These new sources will be "lumped" along with the existing similar equipment in permit AO17-213492, P-5 Paper Machine - Starch Receiving and Storage, Starch Silo #1.

Starches and clays used in papermaking are pneumatically conveyed from rail cars or truck transporters to silos.

Located: 375 Muscogee Road, Cantonment

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SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. [FAC Rule 62-4.160]
2. Satisfactory ladders, platforms and other safety devices as well as necessary parts shall be provided/made available to facilitate an adequate inspection program. [FAC Rule 62-297.310(6)]

Construction

3. The Department shall be notified upon commencement of construction. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during construction. Projects beyond one year require annual status reports. [FAC Rule 62-4.030]

Operation

4. The #1 and #2 Starch Silos, the Clay Storage Silo, and the Winder Dust Collection System may operate continuously. The Department recognizes that silo emissions will occur during silo loading - an intermittent operation. [FAC Rule 62-4.070 and construction permit application]
5. The maximum allowable operating rates are listed below. These are the operating rates at which compliance with standards shall be demonstrated. [FAC Rule 62-4.070 and construction permit application]

#1 Starch Silo (existing)	- 500 lbs/min starch transfer rate
#2 Starch Silo (new)	- 1500 lbs/min starch transfer rate
Clay Storage Silo (new)	- 1500 lbs/min clay transfer rate
Winder Dust Collection System (new)	- None - General dust collection application not directly related to material capacity or throughput.

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Emissions

6. All fugitive dust generated at this site shall be adequately controlled by existing good housekeeping and maintenance practices such as regular sweeping, vacuuming and/or washdowns as needed, and protecting dust transfer points and storage containers against wind action. [FAC Rule 62-296.320(4)]

7. No objectionable odors shall be allowed off plant property. If the Department determines the facility is emitting objectionable odors, the Permittee shall submit an odor remediation plan within 45 days of receipt of written notification from the Department. The plan shall include, but not be limited to, dispersion modeling analysis, strategies to reduce odorous chemicals utilization, and modifications of manufacturing production cycles, manufacturing methods and/or plant exhaust systems. [FAC Rule 62-296.320(2)]

8. General visible emissions shall not be equal to, or greater than, 20% opacity. [FAC Rule 62-296.320(4)] The permittee accepts a 5% visible emissions limit for the #1 and #2 Starch Silos bin vents fabric filters, the Clay Storage Silo bin vent fabric filter, and the Winder Dust Collection System bin vent fabric filter in exchange of waiver of particulate matter testing. [FAC Rule 62-297.310(7)(c), FAC Rule 62-297.620(4), permit application for 0330042003AC, permit AO17-213492]

Testing

9. Visible emissions (VE) tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. [FAC Rule 62-4.070] Tests shall be conducted in accordance with DEP Method 9 for 30 minutes while transferring starch and clay to the appropriate silos. Such tests shall be scheduled within 60 days after construction is completed and yearly thereafter on the source judged to have the highest VE emissions of the group. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity,

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then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

Administrative

10. An annual operating report for air pollutant emitting facility, DEP Form 62-210.990(5), shall be submitted by March 1 of each year. A copy of the form and instructions may be obtained from the Department of Environmental Protection, Northwest District Air Resources Management Program, (904) 444-8364. [FAC Rule 62-210.370]

11. The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of this project. Upon completion the engineer shall inspect for conformity to the permit application and associated documents. An application for an operation permit shall be submitted with the compliance test results and appropriate fee when applicable. These are to be submitted within 75 days of completion of construction. The permittee shall obtain an operating permit for this source before the expiration of this construction permit if the permittee desires to continue operation. [FAC Rule 62-210(300)]

12. In accordance with F.A.C. Rule 62-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 62-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

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13. The emission units covered by this permit are:

- 0330042044 #2 Starch Storage Silo vent filter (new)
- Clay Storage Silo vent filter (new)
- Winder Dust Collector System vent filter (new)
- #1 Starch Storage Silo vent filter (existing)

Please cite the appropriate number on all test reports and other correspondence specific to a permitted emission unit. [FAC Rule 62-297.310]

14. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8364, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 413-9911. For routine business, telephone (904) 444-8364 during normal working hours. [FAC Rule 62-210.700]

Expiration Date:

Issued this 30th day of June,
1997.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

/signed/

ED K. MIDDLESWART, P.E.
Air Program Administrator

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MEMORANDUM

TO : Ed K. Middleswart, P.E.
FROM : Andy Allen, Armando Sarasua
DATE : June 5, 1997
SUBJECT : Evaluation Summary for Champion International Corporation,
Alkaline Conversion Project 0330042044, Escambia County

We recommend issuing public notice of an intent to issue for a construction permit to Champion International Corporation to construct an Alkaline Conversion Project. These new sources will be "lumped" along with the existing similar equipment in permit AO17-213492, P-5 Paper Machine - Starch Receiving and Storage, Starch Silo #1.

Process Description The project involves the installation of equipment to change additives and fillers used in papermaking to alkaline-based papermaking. Each source will be controlled by its own fabric filter dust collector. Starches and clays used in papermaking will be pneumatically conveyed from rail cars or truck transporters to silos.

Pollution Control Equipment Each source will be controlled by its own fabric filter dust collector (baghouse) with +99% PM control efficiency.

Environmental Impact Emissions from a starch storage silo, a clay storage silo and a winder dust collection system are estimated at 1.4 Tons of Particulate Matter per year.

Applicable Rules & Regulations This source is regulated in accordance with FAC Rule 62-297.620(4) allowing PM test waiver in exchange for a 5% VE limit.

Compliance Monitoring Annual VE test according to DEP Method 9 for 30 minutes.

Compliance History None. New sources at this facility.

AIS:asc