Florida Department of Environmental Protection

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Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

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

Authorized Representative:
Mr. Carl Gunter, Mill Manager

Air Permit No. 0330042-015-AC
Permit Expires: January 7, 2016

Pensacola Mill
Title V Air Construction Permit
Modify B-Line Pulp Production Limit

FACILITY AND LOCATION

International Paper Company, Pensacola Mill, is an existing kraft pulp and paper mill (Standard Industrial Classification No. 2611) located in Escambia County at 375 Muscogee Road in Cantonment, Florida. The UTM coordinates are Zone 16, 469.2 km East and 3368.0 km North. The proposed project will eliminate the individual B-Line pulp production limit, but maintain the combined A-Line and B-Line pulp production limit established in construction permit 0330042-012-AC and incorporated into Title V revision 0330042-014-AV.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SPECIFIC CONDITIONS

1. Previous Permits: This permit supplements all previously issued air construction and operation permits for this emissions unit 063. Except for the change noted below, all emission units remain subject to the conditions of all other valid air construction and operations permits. [Rule 62-4.070, F.A.C.]

Equipment

2. Equipment Name: The permittee is authorized to install equipment and make changes to the No. 5 Paper Machine. [Application No. 0330042-015-AC]

Performance Restrictions

3. Emissions Unit No. 063: This emissions unit consists of the low volume high concentration (LVHC) non-condensable gas (NCG) handling system. Specific condition P.1 of Permit 0330042-014-AV shall now read:

   P.1. Capacity: The combined maximum operating rate of the Batch Digester System (B Line) and Kamyr Digester System (A Line) shall not exceed 694,373 ADTUP per year.
   For testing purposes, an anticipated daily maximum operating rate for the Batch digester is 892 ADTUP per day and an anticipated daily maximum operating rate for the Kamyr digester is 1,868.2 ADTUP per day.

Both rates represent a peak short-term production rate that the Mill will be able to achieve and are referenced in this permit to identify the capacity of each emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability. [Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C., Requested by applicant]

{Permitting Note: This project was determined to avoid PSD based on the worst case baseline actual to projected actual emission analysis (either maximum A-line or maximum B-line). Although the Mill has the capability to produce a total of 694,373 ADTUP per year from the A-Line Kamyr digester, the worst-case projected actual emissions were based on maximum operating rates of 291,571 ADTUP per year for the Batch digester system (B-Line) or 493,628 ADTUP per year for the Kamyr digester system (A-Line).}

Reporting Requirements

4. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

   a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of ten years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

   b. The permittee shall report to the Department within 60 days after the end of each calendar year during the ten-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

      1) The name, address and telephone number of the owner or operator of the major stationary source;

      2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;

      3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and

      4) Any other information that the owner or operator wishes to include in the report.

   c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

For this project, the Department requires the annual reporting of actual emissions of volatile organic compounds (VOC), nitrogen oxides (NO_X), sulfur dioxide (SO_2), sulfuric acid mist (SAM or H_2SO_4), TRS, and particulate matter (PM/PM_{10}) from the following units: EU 051, EU 052, EU 063, EU 066 (specifically A-Line Diffusion Washing – Other Sources, B-Line #1 and #2 Brown Stock Washing, Diffusion Washer, Digester and Brown Stock Washers -Other Sources, A-Line O2 Decker System, B Line O2 Delignification, B-Line Bleach Plant- Other Sources, No. 4 Pulp Dryer), EU 067, and EU 069. [Application 0330042-015-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

Testing Requirements

5. Initial and Annual Compliance Tests: The emissions unit shall be tested to demonstrate initial compliance with the emissions rates for volatile organic compounds (VOC), nitrogen oxides (NO_X), sulfur dioxide

(SO_2), sulfuric acid mist (SAM or H_2SO_4), TRS, and particulate matter (PM/PM_{10}), that were utilized in the PSD Avoidance (baseline actual to projected actual) determination. See Attachment – Stack Testing (attached) to determine the specific source testing required. Initial testing shall be conducted within 30 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. For the ten years following resumption of regular operations, the permittee shall conduct stack testing as required by Attachment – Stack Testing. Annual testing shall be conducted once during each federal fiscal year (October 1st – September 30th). The permittee shall use the identical test method or any other equivalent method approved by the Department in writing or any EPA approved method adopted by the Department. [Rules 62-4.070(3) and 62-297.310(7)(a)1 & (a)4, F.A.C.]

6. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Notification may be sent via e-mail to nwdair@dep.state.fl.us. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297 of the Florida Administrative Code.

Executed in Pensacola, Florida

/s/ 1/7/11

Rick Bradburn, Air Program Administrator (Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on January 7, 2011 to the persons listed below.

Carl Gunter, International Paper Company: Carl.Gunter@ipaper.com
Laurie McLain, International Paper Company: Laurie.McLain@ipaper.com
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Kathleen Forney, EPA Region 4: forney.kathleen@epa.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

/s/ 1/7/11

(Clerk) (Date)