Florida Department of Environmental Protection

Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

August 5, 2010

By Electronic Mail, Received Receipt Requested
chris.read@ipaper.com

Mr. Christopher Read
Mill Manager
International Paper Company
375 Muscogee Road
Cantonment, Florida 32533

Dear Mr. Read:

This is to acknowledge receipt of your application for an air construction permit, DEP file number 0330042-015-AC, to revise the B-line pulp production rate at the International Paper Company, Pensacola Mill in Escambia County. This letter constitutes notice that a permit will be required for your project pursuant to Chapter 403, Florida Statutes.

Your application for permit is incomplete. Evaluation of your proposed project will be delayed until all requested information has been received. References made below to "Application" refer to DEP Form No. 62-210.900(1), Effective 3/11/2010 and its instructions.

1. Provide a process flow diagram with the facility's emissions units and their DEP identification numbers as requested in the Application Section II., Subsection C., Facility Additional Information, Item 2, Page 12. The submitted application states that this diagram is attached in Section 2 of the application narrative, but a process flow diagram was not received.

2. Provide the DEP emissions unit identification numbers for each emissions unit in the Application Section III., Subsection A., General Emissions Unit Information, Emissions Unit Description and Status, Item #3, Pages 17, 33, 43, and 59.

3. Several emissions unit identification numbers that were listed in the Application Section III., Subsection A., General Emissions Unit Information, Emissions Unit Description and Status, Item #3 were not consistent with page 3 of the submitted application. Example: on page 169, the G0209 Digesters and Brown Stock Washers are listed as EU 066 but on page 3, they are listed as EU 069. On page 195, the

G0411 B Line O2 Delignification is listed as EU 051, but on page 3, it is listed as EU 069. On page 211, the G0515 B Line Bleach Plant- Other Sources is listed as EU 062 but on page 3, it is listed as EU 066. Please check for consistency and submit corrected pages as necessary.

4. Several emissions unit identification numbers on the application refer to inactive or nonexistent emissions units. Provide the correct DEP emissions unit identification numbers for each emissions unit in the Application Section III., Subsection A., General Emissions Unit Information, Emissions Unit Description and Status, Item #3, on page 87 (incorrect EU number-053 is inactive) , page 101 (incorrect EU number- 070 does not exist), pages 113 and 127 (incorrect EU number -071 does not exist), page 141 (incorrect EU number -054 is inactive), page 155 (incorrect EU number – 072 does not exist), and page 181 (incorrect EU number-050 is inactive). Please clarify which, if any, inactive emissions units are to be reactivated. Please provide appropriate application Subsections for currently non nonexistent emissions units that are to be constructed, if any.

5. The application scope, pg 3, includes 5 emissions units. However, the application pg 16 has 20 emissions points/units listed with identifying numbers starting with "G". This is confusing as for example on page 16, there are 20 emission points/EUs listed but nine of the points seem to be part of EU069, which is described as the pulping system. Another example, on page 17 emissions unit description has "G0102 No. 1 Cyclone Separator", the emissions unit ID number has N/A, but should probably be "052, Woodyard, Log Chipping, Screening". Please revise application to have descriptions and emissions unit numbers match the existing information in our files. See attached table from the ARMS system.

6. Because of the irregularities noted in RAI items 1 through 5 above (lack of a process flow diagram and the inconsistent and missing emissions unit identification numbers) it is very difficult to follow how emissions changes affect known emissions units and a thorough review of this air construction permit application could not be done. Additional information may and probably will be requested at a later time.

7. Appendix B of the submitted application has a key for references, but the key ends with (cc). Please submit the sources for references (dd), (ee) and (ff).

8. The Department received a letter on July 7, 2010 describing process and equipment changes to EU 001 Tall Oil Processing. The letter states that tall oil production and emissions will increase slightly (VOC by 1.3 TPY). All such changes at major facilities should be properly documented and made part of a construction permit. Please provide appropriate application pages for this emissions unit.

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C., requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested in Item(s) [insert number(s)] above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the application form, DEP Form No. 62-210.900(1), effective March 11, 2010 (enclosed).

Professional Engineer (P.E.) Certification Statement**:** Rule 62-4.050(3), Florida Administrative Code (F.A.C.), requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, at a minimum your response to the above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the Non-Title V application form, DEP Form No. 62-210.900(3) (enclosed).

When referring to this project, please use the file number indicated above. The Department must receive a response from you within 90 days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-4.055(1), F.A.C.

If you have any questions, please contact Debbie Moore at 850/595-0624 or Deborah.L.Moore@dep.state.fl.us.

Sincerely,

/s/

Rick Bradburn
Air Program Administrator

RB/dm/c

Enclosures
c: Laurie McLain, International Paper: laurie.mclain@ipaper.com
William V. Straub, P.E.: wstraub@all4inc.com