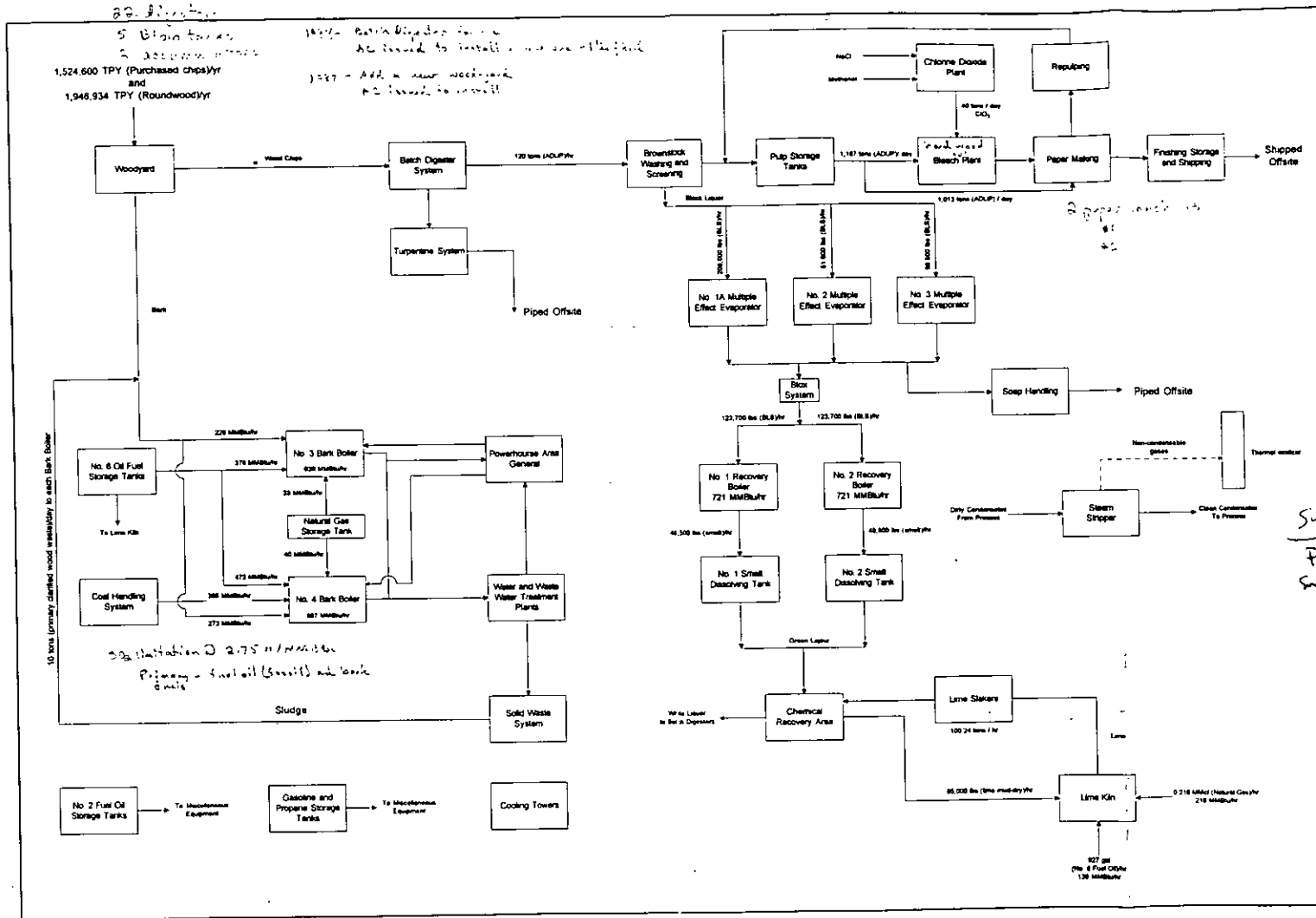


June 7, 1999

@ 10:30 a.m.

Smurfit-Stone: Panama City Mill

Bruce Mitchell	FDEP	850/921-9506
Pat Comerl	FDEP/OGC	(850)921-9621
Jeff Brown	DEP/OGC	(850)921-9625
Al Linero	DEP/BAR	(850)921-9523
Terry Cole	OHF&C (SSCC)	521-0700
David Buff	Golden Assoc.	352-336-5600
C H Fancy	FDSP	850 921 9503
DAVID RILEY	STONE-PANAMA CITY	850-785-4311
Tom Clements	" "	" " "
Charles Adair	Smurfit-Stone	904-714-7120



Smurfit - Stone Container Corporation		Emission Unit:	Overall Plant
Panama City, FL		Process Area:	Overall Plant
SCC-FI-E3		Filename:	SCC-FAC2 VSD
		Latest Revision Date:	6/3/99 2:13 PM



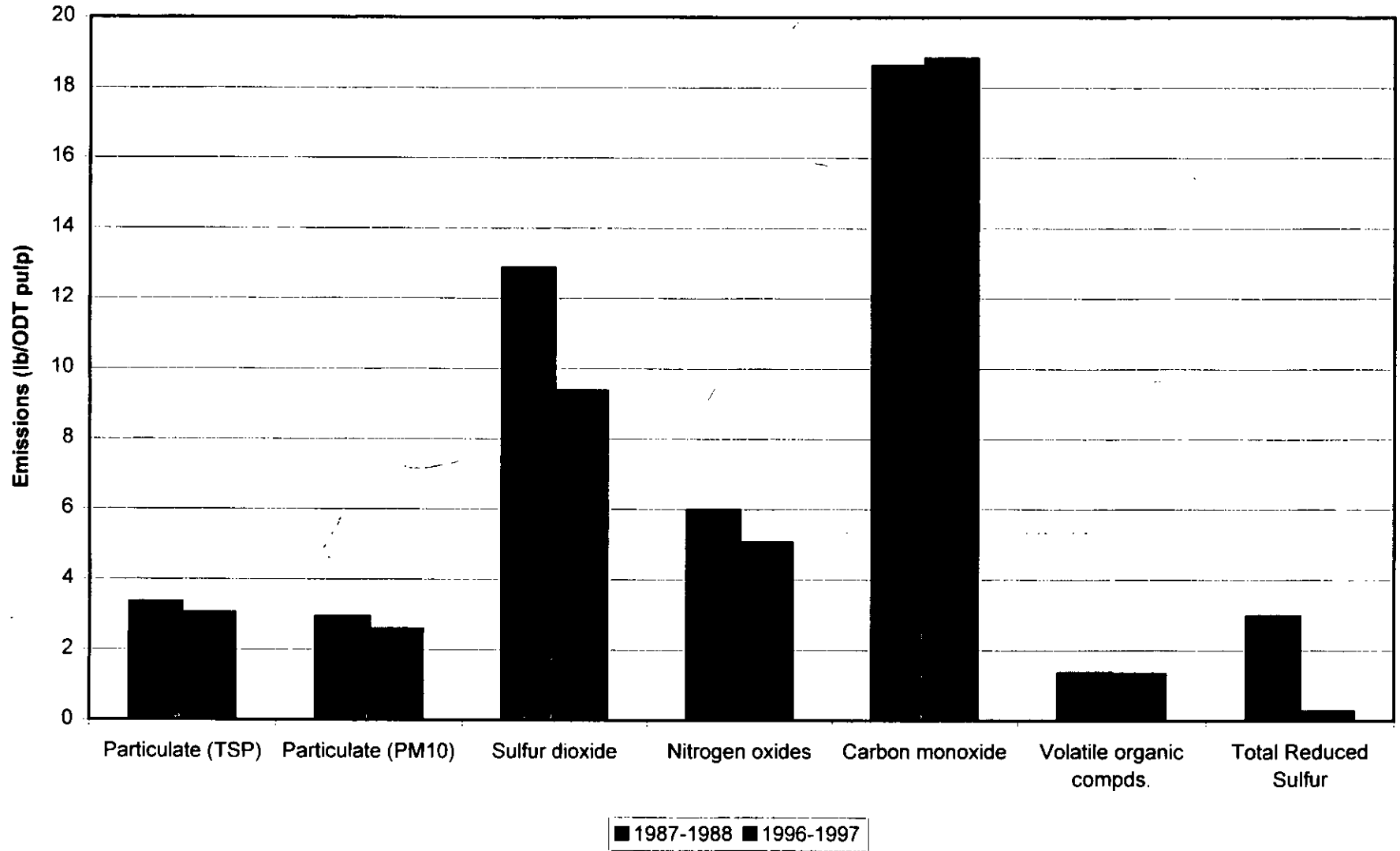
June 7, 1999

① 10:50 a.m.

Smurfit+Stone + Panama City Mill

Bruce Mitchell	FDEP	850/921-9506
Pat Comer	FDEP/OGC	(850)921-9621
Jeff Brown	DEP/OGC	(850)921-9625
Al Linero	DEP/BAR	(850)921-9523
Terry Cole	O.H.F.+C (SSCL)	521-0700
David Buff	Fielder Assoc	352-336-5600
C.H. Faney	FDEP	850 921 9503
DAVID RILEY	STONE-PANAMA CITY	850-785-4311
Tom Clements	" "	" " "
Charles Adcox	Smurfit-Stone	904-714-7120

EMSSIONS PER TON OF PULP



INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 01-Jun-1999 03:54pm
From: Alvaro Linero TAL
LINERO_A
Dept: Air Resources Management
Tel No: 850/921-9532

To: Patricia Comer TAL (COMER_P)
To: Jeffrey E. Brown TAL (BROWN_JE)
To: Bruce Mitchell TAL (MITCHELL_B)
To: Syed Arif TAL (ARIF_S)

Subject: Meeting with Stone Container

Pat, Jeff. Golder Associates wants to set up a meeting to discuss "adjustment" of Stone Container's pulp production limit without triggering PSD. Dave Buff of Golder will be there, together with various company representatives, and Terry Cole of Oertel Hoffman.

How does Monday (6/7) look? How about any other days? Please bring Rule 62-212.400 with you along with definitions of actual emissions and modifications. This may be an important test case.

Syed. Please get a copy of the Title V permit in whatever form it is in (draft, proposed, or final). Also have a look at the most recent permitting actions for that facility. Identify the limiting conditions. Maybe we can discuss prior to the meeting.

Thanks. Al.



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

DECEMBER 4, 1995

David Buff, P.E.
KBN Engineering and Applied Sciences, Inc.
Suite 500
6241 Northwest 23rd Street
Gainesville, Florida 32653-1500

RECEIVED

DEC 5 1995

BUREAU OF
AIR REGULATION

Dear Mr. Buff:

This is in response to your letter dated September 20, 1995 requesting changes to several permits issued to Stone Container. Your letter responded to issues raised by our letter dated July 11, 1995, and our subsequent teleconference.

This letter approves the requested changes as detailed below.

Woodyard Facility; AC03-148859, and AO03-190807:

You requested substitution of a visible emissions limit of 20% in lieu of projected potential PM emissions identified in specific condition 6 of permit AC03-148859, explaining that fugitive PM emissions could not be measured and compliance verified. We agree. As such, the following amendments are approved:

AC03-148859:

Specific condition 6 is deleted

AO03-190807:

Specific condition 16 is changed to include:

f) Visible emissions resulting from activities at the woodyard shall not be equal to or greater than 20%.

Lime Kiln, AC03-149719, AO03-174793:

You requested that the maximum process input rate be identified as 85,000 lbs/hr lime mud (dry) which is measured rather than the production rate of 36,700 lbs/ CaO/hr which is calculated based on the input rate. Additionally, you requested that the sulfur content limit of natural gas be deleted explaining that pipeline natural gas has negligible sulfur content. You also requested that

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Printed on recycled paper.

requirements concerning QA procedures and excess emissions reporting simply reference the appropriate regulations or rules. Lastly you request deletion of a specific condition concerning runoff since it is not germane to an air permit. We agree. As such, the following amendments are approved.

AC03-149719:

Specific condition 2 is changed to read:

The maximum process input rate shall not exceed 85,000 lbs/hr lime mud (dry) based on a maximum lime production of 36,700 lbs CaO/hr dry.

Specific condition 3 is changed by deleting the sentence:

The sulfur content of the natural gas shall not exceed 0.1 percent by weight.

AO03-174793:

Specific condition 15 is changed to read:

The maximum allowable operating rate is 85,000 lbs/hr lime mud (dry) input.

Specific condition 16 is changed by deleting the references to the sulfur content of the natural gas.

Specific condition 17 is changed so that the first sentence reads as follows:

Particulate emissions shall not exceed 29.83 pounds per hour at the maximum allowable operating rate of 85,000 lbs/hr lime mud (dry) input.

The first paragraph of specific condition 23 is revised to read:

A continuous TRS monitor for TRS shall be calibrated, maintained, and operated on the lime kiln in accordance with FAC Rule 62-296.404(5) and 40 CFR 60, Appendix F.

Paragraph A of specific condition 23 is revised to delete the sentence:

A reassessment of the QA Program plan shall be made and submitted to the Northwest District of the DEP within 60 days of the performance specification test.

Specific condition 24 is changed to read as follows:

- 1) The magnitude of excess emissions computed, and the date and time of commencement and completion of each period of excess emissions, in accordance with 62-296.404(6)(a)1.
- 2) The rule reference is changed to 62-296.404(6)(a)2
- 3) The rule reference is changed to 62-296.404(6)(a)3
- 4) The rule reference is changed to 62-296.404(6)(a)4
- 5) The rule reference is changed to 62-296.404(6)(b)

Specific condition 27 is deleted.

No. 1 and 2 Smelt Dissolving Tanks, AO03-222668, AO03-240550:

You requested changes in these permits for consistency between the permits, to cite the correct references, and to improve clarity. Additionally, you request deletion of a specific condition concerning runoff since it is not germane to an air permit. We agree with your suggestions. As such the following amendments are approved.

AO03-222668:

The description is changed to read:

Operation of the No. 1 Smelt Dissolving Tank at a maximum operating rate equal to the maximum allowed operating rate of the No. 1 Recovery Boiler which is 123,700 pounds Black Liquor Solids per hour. Smelt from the recovery boiler is dissolved in weak wash. Particulate emissions are controlled by demister pads made by Otto H. York Company; total reduced sulfur (TRS) emissions are controlled by weak wash sprays. The flow rate of weak wash sprays is monitored as a surrogate compliance parameter.

Specific condition 2 is changed to read as follows:

The maximum allowable operating rate is 123,700 lbs/hr Black Liquor Solids fed to Recovery Boiler No. 1. This is the operating rate at which compliance with standards shall be demonstrated. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90 to 100% of rated capacity. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the source is tested at less than capacity 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 capacity 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.

Specific condition 4 is changed as follows:

FAC Rule reference 17-296.710(2) is changed to 62-296.310(1)
FAC Rule reference 17-296.404(d)(1) is changed to 62-296.404(3)(d)(1)
The two columns labeled "Estimated Emissions" are deleted

Specific condition 10 is deleted.

AO03-240550

The second sentence of the description is changed to read as follows:

Smelt from the recovery boiler is dissolved in weak wash to produce green liquor.

Specific condition 6 is changed by adding:

Weak wash spray flow rate shall be recorded at least once per shift.

No. 1 and 2 Recovery Boilers, AO03-222669, AO03-240555:

You requested changes in these permits for consistency between the permits, and to cite the correct references. You also requested that requirements concerning QA procedures and excess emissions reporting simply reference the appropriate regulations or rules. We agree. As such, the following amendments are approved.

AO03-222669:

Specific condition 4 is changed as follows:

The two columns labeled "Estimated Emissions" are deleted.

Under allowable emissions, TRS delete all and replace with footnote 2 to read as follows:

2. 17.5 ppm by volume, dry basis at standard conditions, at 8% O₂, 12 hour average.

Specific condition 7 is changed as follows:

The first sentence is revised to read:

A continuous TRS monitor for TRS shall be calibrated, maintained and operated on the recovery boiler in accordance with FAC Rule 62-296.404(5) and 40 CFR 60, Appendix F.

The second sentence is deleted.

A. Delete the sentence: A reassessment of the QA Program plan shall be made and submitted to the Northwest District of the DEP within 60 days of the performance specification test.

Specific condition 8 is changed to read as follows:

- A) The magnitude of excess emissions computed, and the date and time of commencement and completion of each period of excess emissions, in accordance with 62-296.404(6)(a)1.
- B) The rule reference is changed to 62-296.404(6)(a)2
- C) The rule reference is changed to 62-296.404(6)(a)3
- D) The rule reference is changed to 62-296.404(6)(a)4
- E) The rule reference is changed to 62-296.404(6)(b)

AO03-240555

The general description is changed to read as follows:

Operation of Recovery Boiler No. 2, fueled by 123,700 pounds of black liquor solids (BLS) per hour. No. 6 fuel oil and/or natural gas is used as auxiliary fuel. The maximum sulfur content of the fuel oil is 2.5%. Particulates (PM) are controlled by an electrostatic precipitator manufactured by Koppers, two sections of four fields each. Total reduced sulfur (TRS) emissions are controlled by oxidation of the black liquor prior to entering the boiler fire box.

Specific condition 6 is changed as follows:

The first sentence is revised to read as follows:

The continuous monitor (CEM) for TRS shall be calibrated, maintained and operated in accordance with FAC Rule 62-296.404(5) and 40 CFR 60, Appendix F.

The following sentence is deleted from paragraph A:

A reassessment of the AQ Program plan shall be made and submitted to the Northwest District of the DEP within 60 days of the performance specification test.

The language "and surrogate parameter" is deleted from specific condition 9.

No. 3 & 4 Bark Boilers; AO03-252353, AC03-190964, AO03-223447

You requested changes to these permits adding emissions limits identified by rule, providing consistency between permits, and eliminating unnecessary notifications.

AO03-252353

Add to the column "Allowable Emissions" in Specific condition 6 for PM, after natural gas, "and fossil fuels"

AC03-190964

Add to the list of fuels in specific condition 4:

Primary clarified wood waste; 10 TPD; 0 Btu/hr

Delete the following language from specific condition 19:

The Department's Northwest District office shall be notified in writing when the boiler is switched to incinerating TRS gases and/or operating at 100% fossil fuel..

AO03-223447

Change the fourth sentence in the general description to read as follows:

Sulfur dioxide emissions when incinerating TRS gases or when burning 100 percent fuel oil are controlled by maintaining a minimum pH of 8.0 in the wet scrubber.

If you have any questions or comments, please contact Bob Kriegel of this office at (904) 444-8364.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed K. Middleswart", with a stylized flourish at the end.

Ed K. Middleswart, P.E.
Program Administrator
Air Resources Management

EKM:bkc

cc: David Riley, Stone Container Corporation
A. A. Linero, DEP Division of Air Resources Management, Tallahassee
Jenny Arias, DEP Northwest District Branch Office, Panama City



RECEIVED

SEP 22 1995

MEMORANDUM

Bureau of
Air Regulation

TO: David Riley, Craig Hurd, A. Allen, A. A. Linero

FROM: David A. Buff *Dab*
KBN Engineering and Applied Sciences, Inc.

DATE: September 20, 1995

RE: Stone Container Corp., Panama City Mill/FDEP Meeting, August 22, 1995, Tallahassee, FL

Attendees: FDEP Tallahassee - A. A. Linero, S. Aref
FDEP NW District (via telephone) - A. Allen, B. Kreigel, E. Middleswart
Stone Container - David Riley, Craig Hurd
KBN - David Buff

Meeting Notes:

General

The FDEP NW District will process all requested changes, except the request related to increasing the fuel oil sulfur content for the Bark Boilers. This request will be processed by FDEP Tallahassee.

Changes to air operating (AO) permits do not need to be public noticed, since the AO permits are not federally enforceable. The requests can in general be handled as permit amendments, with a letter request from the permittee serving as the application. The amendments can reference the previous AO permit, and address the specific conditions which are changed. The entire permit does not need to be reissued.

Changes to air construction (AC) permits will need to be public noticed, in order to retain their federal enforceability. These requests can also be handled as permit amendments, through letter request, except in the case of the increase in fuel oil sulfur content. The amendments can reference the previous AC permit, and address the specific conditions which are changed. The entire permit does not need to be reissued.

D. Buff of KBN agreed to provide notes of the meeting to the various parties.

Woodyard Permit: AC03-148859

Stone Container requested that the condition related to PM emissions be deleted. Stone Container will provide further information related to basis of emissions, actual emissions will not change, no

physical changes or change in method of operation, no modification will occur; VE limit will be accepted in lieu of mass emissions limit.

This request can be handled as permit amendment, through letter request. The amendments can reference the previous AC permit, and address the specific conditions which are changed. Public notice will be required.

Lime Kiln Permit; AC03-149719

Request to delete sulfur content of natural gas; request will be handled in same manner as woodyard permit.

Lime Kiln AO Permit

Same actions as for Lime Kiln AC permit. Also, conditions related to QA plan requirements for continuous TRS monitor will be changed to reference 40 CFR 60, Appendix F and FAC Rule 62-296.404(5). Stone to provide information that Appendix F and 62-296 are being complied with, reporting requirements not changing, etc. Stone to expand on proposed wording.

No. 3 and 4 Bark Boilers

Request to change fuel oil sulfur content will be submitted through FDEP Tallahassee. Stone will propose to lower maximum fuel oil burning rate to offset increase in sulfur, so maximum SO₂ emissions do not change. FDEP will need to determine if new application is required, and if PSD is issue.

Other Requested Changes

The FDEP NW District has agreed to the other requested changes not described above. Stone Container will repeat the requests in a new letter to FDEP. FDEP will process as amendments, as described previously.

cc: File (2)



RECEIVED

SEP 22 1995

September 20, 1995

*Bureau of
Air Regulation*

Mr. Ed Middleswart
Florida Department of Environmental Protection
160 Government Center
Pensacola, FL 32501-5794

Re: Amendments to Current Permits
Stone Container Corporation, Panama City

Dear Mr. Middleswart:

Based on our August 22 meeting in Tallahassee with the Department and your staff (via teleconference), Stone Container Corporation (SCC) is requesting amendments to several current operating permits and past construction permits issued to the facility. This request is based upon the August 22 meeting and a review to determine if any permit conditions are considered to be unnecessary, or if any permit conditions need to be revised to be consistent with applicable requirements.

It is noted that this request covers all the issues discussed in the August meeting, except for the requests dealing with utilizing 2.5 percent sulfur fuel oil in all sources at the mill. The requests related to this issue will be forwarded to the DEP Tallahassee office.

The requested permit amendments are described below for specific conditions (S.C.) of each permit, along with the rationale for such changes.

Woodyard Facility; AC03-148859

S.C. 6 - Substitute a visible emissions limit of 20 percent in lieu of the reference to projected potential PM emissions from the woodyard. The 20 percent visible emission limitation is based upon the general PM emission limiting standards contained in 17-296.310(2).

Reason for Request: Mass emission limits are normally not specified in permits for fugitive dust emissions which cannot be measured. There is no means of directly measuring the fugitive PM emissions from the woodyard. Therefore, there is no available method to demonstrate compliance with a mass emission limit. The visible emissions limit will provide the Department with a measurable means of determining compliance and that reasonable precautions are used to prevent fugitive emissions. This condition is not contained in the current operating permit for the woodyard. For these reasons, this condition is considered unnecessary.

This change in the permit wording will in no way affect actual emissions. There will be no physical changes or changes in the method of operation of the woodyard, and there will be no increase in actual emissions. The basis of the original construction permit application for the new woodyard has not changed. Therefore, this change does not constitute a modification under Florida's air rules.

15112A/3

KBN ENGINEERING AND APPLIED SCIENCES, INC.

6241 Northwest 23rd Street,
Suite 517
Gainesville, Florida 32603-1500
934-336-0290 FAX 934-336-6603

2425 West Cypress Street,
Suite 215
Tampa, Florida 33607
813-277-1717 FAX 813-287-1716

1201 Clint Moore Road, Suite 105
Boca Raton, Florida 33487
561-994-0140
FAX 561-994-0141

2754 Biscayne Way,
Suite 105
Palm Jumeir, Florida 32256
904-735-1700 FAX 904-735-1777

1016 18th Street N.W., Suite 450
Washington, D.C. 20036
202-462-1100
FAX 202-462-2204



Lime Kiln; AC03-149719

S.C. 2 - Revise the condition to read "The maximum process input rate shall not exceed 85,000 lbs/hr lime mud (dry) based on a maximum lime production rate of 36,700 lbs CaO/hr (dry).

Reason for Request: The lime mud input rate is measured, whereas the lime production rate is a calculated value based on the lime mud input. Therefore, this change will provide a more direct method of determining the operating rate.

S.C. 3 - Delete the sentence "The sulfur content of the natural gas shall not exceed 0.1 percent by weight."

Reason for Request: Due to the negligible sulfur content of pipeline natural gas, there is no reason to regulate the sulfur content of natural gas. Also, there is no feasible method to demonstrate compliance with this limitation. SCC contracts for natural gas, and SCC must utilize the natural gas supplied by the supplier.

This change in the permit wording will in no way affect actual emissions. There will be no physical changes or changes in the method of operation of the lime kiln, and there will be no increase in actual emissions. The basis of the original construction permit application for the lime kiln has not changed. Therefore, this change does not constitute a modification under Florida's air rules.

Lime Kiln; AO03-174793

S.C. 15 - Revise the first sentence to read "The maximum allowable operating rate is 85,000 lbs/hr lime mud (dry) input.

Reason for Request: The lime mud input rate is measured, whereas the lime production rate is a calculated value based on the lime mud input. Therefore, this change will provide a direct a more direct method of determining the operating rate.

S.C. 16 - In the second sentence, delete the reference to the sulfur content of the natural gas shall not exceed 0.1 percent by weight.

Reason for Request: Refer to justification under Lime Kiln construction permit (above).

S.C. 17 - Revise the first sentence to read "Particulate emissions shall not exceed 29.83 pounds per hour at the maximum allowable operating rate of 85,000 lbs/hr lime mud (dry) input.

Reason for Request: The lime mud input rate is measured, whereas the lime production rate is a calculated value based on the lime mud input. Also, the process weight table regulation is based on process input. Therefore, this change will provide a direct a more direct method of determining the operating rate.



S.C. 23 - Revise this condition to read: "A continuous TRS monitor for TRS shall be calibrated, maintained and operated on the lime kiln in accordance with FAC Rule 62-296.404(5) and 40 CFR 60, Appendix F."

The second sentence of this specific condition is deleted.

Reason for Request: All necessary QA procedures for the continuous TRS monitoring system are contained in 62-296.404(5) and 40 CFR 60, Appendix F. Therefore, this requirement should be specified instead of a QA Program plan.

It is acknowledged that SCC did not submit a Quality Assurance Program plan to the Department, as required by this condition. However, SCC has complied with 62-296.404(5) and 40 CFR 60, Appendix F, and therefore has complied with the intent of this condition. In fact, SCC has actually performed quality assurance practices which go beyond the minimum requirements. This includes performing relative accuracy (RATA) testing annually on the TRS monitors. RATA testing is only required under the rules upon initial installation, and after replacement of major TRS monitoring system components. The results of the annual RATA testing have been submitted to the Department.

S.C. 23.A. - Delete the sentence "A reassessment of the QA Program plan shall be made and submitted to the Northwest District of the DEP within 60 days of the performance specification test."

Reason for Request: Same rationale as for S.C. 23 above.

S.C. 24 - This condition refers to the federal new source performance standards. However, the lime kiln is not an NSPS source, and therefore is not subject to 40 CFR 60.284 or 40 CFR 60.7. The digester system, although subject to the NSPS, is not required to have a CEM for TRS if the TRS is incinerated in a non-NSPS lime kiln and the TRS gases are subject to a minimum temperature of 1200°F for at least 0.5 seconds. The correct reference to excess emissions and reporting requirements should cite the Florida TRS rules, i.e., 62-296.404(5) and (6). The Florida rules require essentially the same requirements as the federal NSPS, therefore, there will be no substantive change in the current reporting requirements. Therefore, the following changes are requested:

S.C. 24.1 - Reword to read: "The magnitude of excess emissions computed, and the date and time of commencement and completion of each period of excess emissions, in accordance with 62-296.404(6)(a)1."

S.C. 24.2 - Correct reference is 62-296.404(6)(a)2.

S.C. 24.3 - Correct reference is 62-296.404(6)(a)3.

S.C. 24.4 - Correct reference is 62-296.404(6)(a)4.

S.C. 24.5 - Correct reference is 62-296.404(6)(b).



S.C. 27 - Delete this condition.

Reason for Request: This condition is not an air quality requirement, and therefore should be deleted from the air permit.

No. 1 Smelt Dissolving Tank; AO03-222668

Description of Source - Revise the description to read "Operation of the No. 1 Smelt Dissolving Tank at a maximum operating rate equal to the maximum allowed operating rate of the No. 1 Recovery Boiler which is 123,700 pounds Black Liquor Solids per hour. Smelt from the recovery boiler is dissolved in weak wash. Particulate emissions are controlled by demister pads made by Otto H. York Company; total reduced sulfur (TRS) emissions are controlled by weak wash sprays. The flow rate of weak wash sprays is monitored as a surrogate compliance parameter.

Reason for Request: Revise wording to be consistent with the wording for the No. 2 Smelt Dissolving Tank.

S.C. 2 - Revise wording of this condition to be consistent with the wording in S.C. 2 of the operating permit for the No. 2 Smelt Dissolving Tank. Also correct "123,700 lbs/hr of black liquor" to "123,700 lbs/hr of black liquor solids".

Reason for Request: Revise wording to be consistent with the wording for the No. 2 Smelt Dissolving Tank.

S.C. 4 - Reference to 17-296.710(2) is incorrect since this rule refers to the RACT limits for PM, which apply only in PM nonattainment areas. The correct reference should be to Rule 62-296.310(1), which is the process weight regulation. The reference to 296.404(d)(1) is incorrect, and should be 296.404(3)(d)1. Also, delete the two columns with the heading "Estimated Emissions".

Reason for Request: Revise the condition to reflect the correct rule citation. Citing of estimated emissions is unnecessary in the permit.

S.C. 10 - Delete this condition.

Reason for Request: This condition is not an air quality requirement, and therefore should be deleted from the air permit.

No. 2 Smelt Dissolving Tank; AO03-240550

Description of Source - The second sentence should be revised to read "Smelt from the recovery boiler is dissolved in weak wash to produce green liquor."

Reason for Request: To clarify the actual operation of the smelt tank.



S.C. 6 - Revise condition to require that the surrogate parameter of weak wash flow rate be recorded at least once per shift.

Reason for Request: The current permit wording does not specify the frequency for recording weak wash flow. The requested change will be consistent with the No. 1 Smelt tank, which requires recording of the flow rate at least once per shift.

No. 1 Recovery Boiler; AO03-222669

S.C. 4 - Delete the two columns with the heading "Estimated Emissions." Also, revise the wording of this condition to be consistent with the wording in S.C. 4 of the Recovery Boiler No. 1 operating permit, which does not contain a reference to lbs/hr or TPY for TRS emissions.

Reason for Request: Citing of estimated emissions is unnecessary in the permit, and the 17.5 ppm limit is sufficient to limit TRS emissions. Also, in order to update the Department's files, the last three compliance tests for the recovery boiler have been reviewed. Based on this review, the maximum anticipated gas flow rate from the recovery boiler system is 180,000 dscfm @ 8 percent O₂. The TRS emissions resulting from this flow rate are calculated as follows:

$$PV = mRT; m = PV/RT$$

$$m = 2,116.8 \text{ lb}_f/\text{ft}^2 \times 180,000 \text{ ft}^3/\text{min} \times 60 \text{ min/hr} \\ \times (34/1545) \text{ lb}_m\text{-}^\circ\text{R}/\text{ft}\text{-lb}_f \times 1/528^\circ\text{F} \times 17.5/10^6 \\ = 16.67 \text{ lb/hr} = 73.0 \text{ TPY}$$

S.C. 7 - In the same manner as the lime kiln permit, revise first sentence to read "A continuous TRS monitor for TRS shall be calibrated, maintained and operated on the recovery boiler in accordance with FAC Rule 62-296.404(5) and 40 CFR 60, Appendix F." Delete the second sentence.

S.C. 7.A. - Delete the sentence "A reassessment of the QA Program plan shall be made and submitted to the Northwest District of the DEP within 60 days of the performance specification test."

Reason for Request: All necessary QA procedures for the continuous TRS monitoring system are contained in 62-296.404(5) and 40 CFR 60, Appendix F. Therefore, this requirement should be specified instead of a QA Program plan.

As described for the lime kiln, SCC has performed quality assurance procedures on the recovery boiler TRS monitors which meet the requirements of Appendix F, and has additionally performed annual RATA testing.

S.C. 8 - This condition refers to the federal new source performance standards. However, the No. 1 Recovery Boiler is not an NSPS source, and therefore is not subject to 40 CFR 60.284 or 40 CFR 60.7. The correct reference to excess emissions and reporting requirements should cite the Florida TRS rules, i.e., 62-296.404(5) and (6). The Florida rules require essentially the same requirements as the federal NSPS.



therefore, there will be no change in the current reporting requirements. Therefore, the following changes are requested:

S.C. 8.A. - Reword to read: "The magnitude of excess emissions computed, and the date and time of commencement and completion of each period of excess emissions, in accordance with 62-296.404(6)(a)1."

S.C. 8.B. - Correct reference is 62-296.404(6)(a)2.

S.C. 8.C. - Correct reference is 62-296.404(6)(a)3.

S.C. 8.D. - Correct reference is 62-296.404(6)(a)4.

S.C. 8.E. - Correct reference is 62-296.404(6)(b).

No. 2 Recovery Boiler; AO03-240555

Description of Source - Reword description to be consistent with description for No. 1 Recovery Boiler, i.e., drop reference to steam production, include natural gas as auxiliary fuel.

Reason for Request: Revise wording to be consistent with the wording for the No. 1 Recovery Boiler.

S.C. 6 - Revise first sentence to read "The continuous monitor (CEM) for TRS shall be calibrated, maintained and operated in accordance with FAC Rule 62-296.404(5) and 40 CFR 60, Appendix F."

S.C. 6.A. - Delete the sentence "A reassessment of the QA Program plan shall be made and submitted to the Northwest District of the DEP within 60 days of the performance specification test."

Reason for Request: All necessary QA procedures for the continuous TRS monitoring system are contained in 62-296.404(5) and 40 CFR 60, Appendix F. Therefore, this requirement should be specified instead of a QA Program plan.

S.C. 9 - Delete the phrase "and surrogate parameter" from this condition.

Reason for Request: Since the boiler has a CEM for TRS, no surrogate parameter monitoring is required.

No. 3 Bark Boiler; AO03-252353

S.C. 6 - Under allowable emissions for PM, revise the limitation to read "0.1 lb/MMBtu from fossil fuels."

Reason for Request: Clarifies that the 0.1 lb/MMBtu limit also applies to fuel oil firing.



No. 4 Bark Boiler; AC03-190964

S.C. 4 - Add to the list of fuels: Primary clarified wood waste 10 TPD 0 Btu/hr

Reason for Request: The clarified woodwaste is a fuel already contained in the No. 3 Bark Boiler permit. This will provide consistency among the permits. The No. 4 Bark Boiler operating permit already reflects this change. There will be no change in emissions due to this request.

S.C. 19 - Delete the first part of this condition which requires notification to FDEP each time the boiler is incinerating TRS gases or burning 100 percent fuel oil.

Reason for Request: There is no basis for requiring the FDEP to be notified each time these activities take place. These activities or methods of operation are allowed under the permit. SCC keeps appropriate records of the dates and times when these operating conditions exist.

No. 4 Bark Boiler; AO03-223447

Description of Source- Revise fourth sentence to read "Sulfur dioxide emissions when incinerating TRS gases or when burning 100 percent fuel oil are controlled by maintaining a minimum pH of 8.0 in the wet scrubber."

Please consider these requested changes to the permits. If you have any questions concerning this request, please call.

Sincerely,

David A. Buff, P.E.
Principal Engineer
Florida P.E. #19011

SEAL

DAB/arz

cc: David Riley
Craig Hurd
A. A. Linero
File (2)



June 30, 1995

Mr. Ed Middleswart
Florida Department of Environmental Regulation
160 Government Center
Pensacola, FL 32501-5794

Re: Amendments to Current Permits
Stone Container Corporation, Panama City

Dear Mr. Middleswart:

Stone Container Corporation (SCC), is currently preparing the Title V operating permit application for the Panama City paper mill. As part of this process, a review of all current operating permits and past construction permits has been undertaken. This review has been conducted to determine if any permit conditions are considered to be unnecessary, or if any permit conditions need to be revised to be consistent with applicable requirements. As you may be aware, the Department, through the Title V group in Tallahassee headed by John Brown, has recommended that such reviews and requests be made prior to the Title V application due date in order that the permits can be revised prior to the due date. The Title V due date for the Panama City mill is November 15, 1995.

The requested permit amendments are described below for specific conditions (S.C.) of each permit, along with the rationale for such change.

Woodyard Facility: AC03-148859

S.C. 6 - Delete this condition.

- Reason for Request:
Mass emission limits are normally not specified in permits for fugitive dust emissions which cannot be measured. Also, the permit wording limits "projected potential emissions"; it does not require actual emissions to be less than the specified amounts. This condition is not contained in the current operating permit for the woodyard. For these reasons, this condition is considered unnecessary.

Lime Kiln: AC03-149719--

S.C. 2 - Revise the condition to read "The maximum process input rate shall not exceed 85,000 lbs/hr lime mud (dry) based on a maximum lime production rate of 36,700 lbs CaO/hr (dry).

15112A/1

KBN ENGINEERING AND APPLIED SCIENCES, INC.

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Suite 1000
Orlando, Florida 32801
407 225-1111 FAX 407 225-1112

1819 E. Street, Suite 100
West Palm Beach, Florida 33411
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FAX 561 833-1112



Reason for Request:

The lime mud input rate is measured, whereas the lime production rate is a calculated value based on the lime mud input. Therefore, this change will provide a direct a more direct method of determining the operating rate.

- S.C. 3 - Delete the sentence "The sulfur content of the natural gas shall not exceed 0.1% by weight."

Reason for Request:

Due to the negligible sulfur content of pipeline natural gas, there is no reason to regulate the sulfur content of natural gas.

Lime Kiln; AO03-174793

- S.C 15 - Revise the first sentence to read "The maximum allowable operating rate is 85,000 lbs/hr lime mud (dry) input.

Reason for Request:

The lime mud input rate is measured, whereas the lime production rate is a calculated value based on the lime mud input. Therefore, this change will provide a direct a more direct method of determining the operating rate.

- S.C. 16 - In the second sentence, delete the reference to the sulfur content of the natural gas shall not exceed 0.1% by weight.

Reason for Request:

Due to the negligible sulfur content of pipeline natural gas, there is no reason to regulate the sulfur content of natural gas.

- S.C 17 - Revise the first sentence to read "Particulate emissions shall not exceed 29.83 pounds per hour at the maximum allowable operating rate of 85,000 lbs/hr lime mud (dry) input.

Reason for Request:

The lime mud input rate is measured, whereas the lime production rate is a calculated value based on the lime mud input. Also, the process weight table regulation is based on process input. Therefore, this change will provide a direct a more direct method of determining the operating rate.

S.C. 23 - Revise first sentence to read " A continuous TRS monitor for TRS shall be calibrated, maintained and operated on the lime kiln in accordance with FAC Rule 62-296.404(5) and 40 CFR 60, Appendix B." Delete the second sentence.

S.C. 23.A. - Delete the sentence "A reassessment of the QA Program plan shall be made and submitted to the Northwest District of the DER within 60 days of the performance specification test."

Reason for Request:

All necessary QA procedures for the continuous TRS monitoring system are contained in 62-296.404(5) and 40 CFR 60, Appendix B. Therefore, this requirement should be specified instead of a QA Program plan.

S.C. 24 - This condition refers to the federal new source performance standards. However, the lime kiln is not an NSPS source, and therefore is not subject to 40 CFR 60.284 or 40 CFR 60.7. The digester system, although subject to the NSPS, is not required to have a CEM for TRS if the TRS is incinerated in a non-NSPS lime kiln and the TRS gases are subject to a minimum temperature of 1200°F for at least 0.5 seconds. The correct reference to excess emissions and reporting requirements should cite the Florida TRS rules, i.e., 62-296.404(5).

S.C. 27 - Delete this condition.

Reason for Request:

This condition is not an air quality requirement, and therefore should be deleted from the air permit.

Lime Slaker; AO03-252354

S.C. 4 - SCC is hereby submitting the attached plan for monitoring the scrubber performance, as required by this condition.

No. 1 Smelt Dissolving Tank; AO03-222668

Description of Source -

Revise the description to read "Operation of the No. 1 Smelt Dissolving Tank at a maximum operating rate equal to the maximum allowed operating rate of the No. 1

Recovery Boiler which is 123,700 pounds Black Liquor Solids per hour. Smelt from the recovery boiler is dissolved in weak wash. Particulate emissions are controlled by demister pads made by Otto H. York Company; total reduced sulfur (TRS) emissions are controlled by weak wash sprays. The flow rate of weak wash sprays is monitored as a surrogate compliance parameter.

Reason for Request:

Revise wording to be consistent with the wording for the No. 2 Smelt Dissolving Tank.

- S.C. 2 - Revise wording of this condition to be consistent with the wording in S.C. 2 of the operating permit for the No. 2 Smelt Dissolving Tank. Also correct "123,700 lbs/hr of black liquor" to "123,700 lbs/hr of black liquor solids".

Reason for Request:

Revise wording to be consistent with the wording for the No. 2 Smelt Dissolving Tank.

- S.C. 4 - Reference to 17-296.710(2) is incorrect since this rule refers to the RACT limits for PM, which apply only in PM nonattainment areas. The correct reference should be to Rule 62-296.310(1), which is the process weight regulation. The reference to 296.404(d)(1) is incorrect, and should be 296.404(3)(d)1. Also, delete the two columns with the heading "Estimated Emissions".

Reason for Request:

Revise the condition to reflect the correct rule citation. Citing of estimated emissions is unnecessary in the permit.

- S.C. 10 - Delete this condition.

Reason for Request:

This condition is not an air quality requirement, and therefore should be deleted from the air permit.

No. 2 Smelt Dissolving Tank; AO03-240550

Description of Source -

The second sentence should be revised to read "Smelt from the recovery boiler is dissolved in weak wash to produce green liquor."

Reason for Request:

To clarify the actual operation of the smelt tank.

- S.C. 6** - Revise condition to require that the surrogate parameter of weak wash flow rate be recorded at least once per shift.

Reason for Request:

The current permit wording does not specify the frequency for recording weak wash flow. The requested change will be consistent with the No. 1 Smelt tank, which requires recording of the flow rate at least once per shift.

No. 1 Recovery Boiler; AO03-222669

- S.C. 4 -** Delete the two columns with the heading "Estimated Emissions". Also, revise the wording of this condition to be consistent with the wording in S.C. 4 of the Recovery Boiler No. 1 operating permit, which does not contain a reference to lbs/hr or TPY for TRS emissions.

Reason for Request:

Citing of estimated emissions is unnecessary in the permit, and the 17.5 ppm limit is sufficient to limit TRS emissions. Also, in order to update the Department's files, the last three compliance tests for the recovery boiler have been reviewed. Based on this review, the maximum anticipated gas flow rate from the recovery boiler system is 180,000 dscfm @ 8% O₂. The TRS emissions resulting from this flow rate are calculated as follows:

$$PV = mRT; m = PV/RT$$

$$m = 2,116.8 \text{ lb}_r/\text{ft}^2 \times 180,000 \text{ ft}^3/\text{min} \times 60 \text{ min/hr}$$

$$\times (34/1545) \text{ lb}_m\text{-}^\circ\text{R}/\text{ft}\text{-lb}_r \times 1/528^\circ\text{F} \times 17.5/10^6$$

$$= 16.67 \text{ lb/hr} = 73.0 \text{ TPY}$$

S.C. 7 - Revise first sentence to read " A continuous TRS monitor for TRS shall be calibrated, maintained and operated on the recovery boiler in accordance with FAC Rule 62-296.404(5) and 40 CFR 60, Appendix B." Delete the second sentence.

S.C. 7.A. - Delete the sentence "A reassessment of the QA Program plan shall be made and submitted to the Northwest District of the DER within 60 days of the performance specification test."

Reason for Request:

All necessary QA procedures for the continuous TRS monitoring system are contained in 62-296.404(5) and 40 CFR 60, Appendix B. Therefore, this requirement should be specified instead of a QA Program plan.

S.C. 8 - This condition refers to the federal new source performance standards. However, the No. 1 Recovery Boiler is not an NSPS source, and therefore is not subject to 40 CFR 60.284 or 40 CFR 60.7. The correct reference to excess emissions and reporting requirements should cite the Florida TRS rules, i.e., 62-296.404(5).

No. 2 Recovery Boiler; AO03-240555

Description of Source

- Reword description to be consistent with description for No. 1 Recovery Boiler, i.e., drop reference to steam production, include natural gas as auxiliary fuel.

Reason for Request:

Revise wording to be consistent with the wording for the No. 1 Recovery Boiler.

S.C. 6 - Revise first sentence to read "The continuous monitor (CEM) for TRS shall be calibrated, maintained and operated in accordance with FAC Rule 62-296.404(5) and 40 CFR 60, Appendix B."

S.C. 7.A. - Delete the sentence "A reassessment of the QA Program plan shall be made and submitted to the Northwest District of the DER within 60 days of the performance specification test."

Reason for Request:

All necessary QA procedures for the continuous TRS monitoring system are contained in 62-296.404(5) and 40 CFR 60, Appendix B. Therefore, this requirement should be specified instead of a QA Program plan.

S.C. 9 - Delete the phrase "and surrogate parameter" from this condition.

Reason for Request:

Since the boiler has a CEM for TRS, no surrogate parameter monitoring is required.

No. 3 Bark Boiler; AO03-252353

S.C. 4 - Revise fuel oil sulfur content of 2.5%.

Reason for Request:

The Florida rules limit fossil fuel steam generators to 2.75 lb/MMBtu, which is equivalent to 2.5% sulfur fuel oil. Also, permits for several other sources at SCC allow 2.5% sulfur fuel oil, and the plant has a single fuel oil tank and piping system.

S.C. 6 - Under allowable emissions for PM, revise the limitation to read "0.1 lb/MMBtu from natural gas and fuel oil."

Reason for Request:

Clarifies that the 0.1 lb/MMBtu limit also applies to fuel oil firing.

No. 4 Bark Boiler; AC03-190964

S.C. 4 - Revise the fuel oil sulfur content to 2.5%. Add to the list of fuels:
Primary clarified wood waste 10 TPD 0 Btu/hr

Reason for Request:

The Florida rules limit fossil fuel steam generators to 2.75 lb/MMBtu, which is equivalent to 2.5% sulfur fuel oil. Also, permits for several other sources at SCC allow 2.5% sulfur fuel oil, and the plant has a single fuel oil tank and piping system. The clarified woodwaste is a fuel already contained in the No. 3 Bark Boiler permit. This will provide consistency among the permits.

S.C. 10 - Delete SO₂ from specific condition.

Reason for Request:

SO₂ emissions are limited by the sulfur content of the fuels being burned and the SO₂ removal efficiency.

- S.C. 19** - Delete the first part of this condition which requires notification to FDEP each time the boiler is incinerating TRS gases or burning 100% fuel oil.

Reason for Request:

There is no basis for requiring the FDEP to be notified each time these activities take place. These activities or methods of operation are allowed under the permit. SCC keeps appropriate records of the dates and times when these operating conditions exist.

No. 4 Bark Boiler: AO03-223447

Description of Source

- Revise third sentence to read "Sulfur dioxide emissions when incinerating TRS gases or when burning 100% fuel oil are controlled by maintaining a minimum pH of 8.0 in the wet scrubber."

- S.C. 3** - Revise the fuel oil sulfur content to 2.5%. Add to the list of fuels:
Primary clarified wood waste 10 TPD 0 Btu/hr

Reason for Request:

The Florida rules limit fossil fuel steam generators to 2.75 lb/MMBtu, which is equivalent to 2.5% sulfur fuel oil. Also, permits for several other sources at SCC allow 2.5% sulfur fuel oil, and the plant has a single fuel oil tank and piping system. The clarified woodwaste is a fuel already contained in the No. 3 Bark Boiler permit. This will provide consistency among the permits.

- S.C. 4** - Delete column heading entitled "Estimated TPY". Clarify that TRS limit is 12-hour average.

Reason for Request:

The estimated TPY listed in the permit have no regulatory meaning, and the numbers do not agree with the construction permit allowables. Moreover, the allowable limits in terms of lb/MMBtu and ppm TRS are sufficient to limit annual emissions from this source.

- S.C. 10** - Delete the first part of this condition which requires notification to FDEP each time the boiler is incinerating TRS gases or burning 100% fuel oil.

Reason for Request:

There is no basis for requiring the FDEP to be notified each time these activities take place. These activities or methods of operation are allowed under the permit. SCC keeps appropriate records of the dates and times when these operating conditions exist.

Please consider these requested changes to the permits. If you have any questions concerning this request, please call.

Sincerely,

David A. Buff

David A. Buff, P.E.
Principal Engineer
Florida P.E. #19011

SEAL

cc: David Riley
Craig Hurd

DB/mlb