

Golder Associates Inc.

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April 23, 2003

0137598

Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attention: Ms. Trina Vielhauer, Chief, Bureau of Air Regulation

RE: STONE CONTAINER CORPORATION - PANAMA CITY MILL
PERMIT NO. 0050009-005-AC/PSD-FL-288
WOODYARD OPERATIONS

RECEIVED
APR 28 2003
BUREAU OF AIR REGULATION

Dear Ms. Vielhauer:

Stone Container Corporation (SCC) was issued construction permit No. 0050009-005-AC/PSD-FL-288 for modification to the batch digester system and woodyard operations on September 9, 2002. The purpose of this letter is to request a revision to this permit in regards to the facility description of the Woodyard and the capacity limitations on the Woodyard. SCC is in the process of revising the Title V permit for the facility, and wants to correct the construction permit in order to obtain a correct Title V permit.

In the facility description in Section I, Subsection A, of the above referenced PSD construction permit, the following is stated:

"In addition, the modification will allow the woodyard's production rates to increase from 554,000 cords of purchased chips per year and 645,600 cords of roundwood per year to 1,524,600 cords of purchased chips per year and 1,946,934 cords of roundwood per year."

In Section III, Subsection A, Condition A.1, of the permit it is stated:

"The woodyard's maximum allowable production rates are 1,524,600 cords of purchased chips per year and 1,946,934 cords of roundwood per year."

Review of these permitted rates with the rates specified in the application for the pulp production increase indicates that the units were incorrectly stated in the permit as cords per year instead of tons per year.

The Woodyard production rates corresponding to the increase in pulp production to 781,000 tons per year (TPY) of pulp were contained in the document entitled "Supplemental Information for PSD Permit Application, Stone Container Corporation, Panama City, Florida" (April 2000), prepared by Golder Associates Inc. The rates were presented in Appendix A, Table A-6, of this document, and is attached for your convenience. As shown, the correct rates are 1,946,934 tons of roundwood per year and 1,524,600 tons of purchased chips per year (see footnotes "e" and "j" in table). In terms of cords, the correct rates are 710,160 cords of roundwood per year and 609,840 cords of purchased chips per year. These rates are summarized in the attached Table 1, and contain the 10-percent safety factor indicated in the footnotes to Table A-6.

SCC requests that the facility description and Condition A.1 of the construction permit be revised to reflect the correct throughput rates for the Woodyard. To support this request, attached is the air permit application form for the Woodyard.

Thank you for your consideration of this request. If you have any questions, please call me at (352) 336-5600 or Tom Clements at (850) 785-4311 ext. 470.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P. E., Q. E. P.
Principal Engineer

DB/jkw

cc: Tom Clements
Sandra Veazey, Northwest District

Table A-6 Maximum Emissions from the Woodyard at Stone Container, Panama City

SOURCE	Type of Operation (a)	M Moisture Content (%)	U Wind Speed (MPH)	Uncontrolled Emission Factor	Type of Control	Control Efficiency (%)	Controlled Emission Factor	Activity Factor	Maximum Annual PM Emissions (lb/yr)(c)	PM10 Size Multiplier (c)	Maximum Annual PM10 Emissions (lb/yr)(c)
ROUNDWOOD HANDLING											
Debarker	Debarking	0.024 lb/ton (d)	Enclosure	80	0.00480 lb/ton	1,946,934 TPY (e)	4.673	0.35	1.635
Chipper	Continuous Drop	30	7.8	0.00013 lb/ton	None	0	0.00013 lb/ton	1,946,934 TPY (e)	0.125	0.35	0.244
Chip Surge Bin to Conveyor	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.00003 lb/ton	1,946,934 TPY (e)	0.025	0.35	0.0488
Conveyor to Tower No. 1 Chip Diverter	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.00003 lb/ton	1,946,934 TPY (e)	0.025	0.35	0.0488
BARK HANDLING											
Debarker to Bark Conveyor	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.00003 lb/ton	155,755 TPY (f)	0.020	0.35	0.00070
Bark Conveyor to No. 1 Bark Diverter	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.00003 lb/ton	155,755 TPY (f)	0.020	0.35	0.00070
No. 1 Bark Diverter to Emergency Bark Storage Pile	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.00003 lb/ton	0 TPY (f)	0.0000	0.35	0.00000
Emergency Bark Storage Pile	Wind Erosion	None	0	0.0094	1.0	0.0094
Limbed Bark Storage Pile	Wind Erosion	None	0	0.0094	1.0	0.0094
Tracked Bark to Purchased Limbed Bark Storage Pile	Baton Drop	30	7.8	0.00013 lb/ton	None	0	0.00013 lb/ton	316,038 TPY (g)	0.020	0.48	0.00212
Front End Loaded to Bark Hopper	Baton Drop	30	7.8	0.00013 lb/ton	None	0	0.00013 lb/ton	316,038 TPY (g)	0.020	0.35	0.00712
Woodshed Conveyor to No. 1 Bark Diverter	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	316,038 TPY (g)	0.0041	0.35	0.00142
No. 1 Bark Diverter to Oak Screen	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	471,853 TPY (h)	0.0061	0.35	0.00213
Bark Hog	Hammermill	0.024 lb/ton (d)	Enclosed	80	0.00480 lb/ton	471,853 TPY (h)	1.112	1.0	1.112
Bark Hog to Hogged Bark Conveyor	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	471,853 TPY (h)	0.0061	0.35	0.00213
Hogged Bark Conveyor to Hogged Bark Pile	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	471,853 TPY (h)	0.0061	0.35	0.00213
Hogged Bark Pile	Wind Erosion	None	0	0.0023	1.0	0.0023
Bark Bin Cyclone	Cyclone Vent	2.0 lb/hr	Cyclone	0	2.0 lb/hr	8.760 hr/yr	8.76	0.35	3.07
Bark Bin Cyclone to Small Bark Bin and Screw	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	471,853 TPY (h)	0.0061	0.35	0.00213
Small Bark Bin and Screw to Bark Conveyor	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	471,853 TPY (h)	0.0061	0.35	0.00213
Bark Conveyor to No. 2 Bark Diverter	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	471,853 TPY (h)	0.0061	0.35	0.00213
Bark Storage Pile Maintenance	Vehicle Traffic	0.74 lbs/VMT	None	0	0.74 lbs/VMT	21,900 VMT (i)	8.103	0.35	2.836
PURCHASED CHIP HANDLING											
Truck Unloading (Chip Van Hopper)	Batch Drop	30	7.8	0.00013 lb/ton	Covered	60	0.000051 lb/ton	762,300 TPY (j)	0.020	0.35	0.00069
Railcar Unloading (Chip Van Hopper)	Batch Drop	30	7.8	0.00013 lb/ton	Covered	60	0.000051 lb/ton	762,300 TPY (j)	0.020	0.35	0.00069
Truck Unloading Conveyor to Tower No. 1 Chip Diverter	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	762,300 TPY (j)	0.010	0.35	0.0034
Railcar Unloading Conveyor to Tower No. 1 Chip Diverter	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	762,300 TPY (j)	0.010	0.35	0.0034
MANUFACTURED AND PURCHASED CHIP PROCESSING											
Tower No. 1 Diverter to Chip Conveyor (2)	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	3,315,779 TPY (k)	0.043	0.35	0.015
Chip Conveyor to Tower No. 2 Diverter (2)	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	3,315,779 TPY (k)	0.043	0.35	0.015
Tower No. 2 Diverter to Chip Reclaim Conveyor (2)	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	3,315,779 TPY (k)	0.043	0.35	0.015
Chip Reclaim Conveyor to Reclaim Conveyor (2)	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	3,315,779 TPY (k)	0.043	0.35	0.015
Reclaim Conveyor to Chip Reclaim Storage Pile (2)	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	3,315,779 TPY (k)	0.043	0.35	0.015
Chip Reclaim Storage Pile (2)	Wind Erosion	None	0	0.048	1.0	0.048
Chip Reclaim Storage Pile to Chip Conveyor (2)	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	3,315,779 TPY (k)	0.043	0.35	0.015
Chip Conveyor to Tower No. 2 Diverter (2)	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	3,315,779 TPY (k)	0.043	0.35	0.015
Tower No. 2 Diverter to Chip Screen (2)	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	3,315,779 TPY (k)	0.043	0.35	0.015
Chip Screen to Primary Screen (2)	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	3,315,779 TPY (k)	0.043	0.35	0.015
Chip Screens	Screening
Sortwood Primary Screen Cyclone	Cyclone Vent	2.0 lb/hr	Cyclone Enclosure	80	0.40 lb/hr	8,760 hr/yr	1,752	0.35	0.613
Hardwood Primary Screen Cyclone	Cyclone Vent	2.0 lb/hr	Enclosure	80	0.40 lb/hr	8,760 hr/yr	1,752	0.35	0.613
Primary Screen to Secondary Screen (2)	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	3,315,779 TPY (k)	0.043	0.35	0.015
Secondary Screen to Chip Conveyor (2)	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	3,315,779 TPY (k)	0.043	0.35	0.015
Screen Building Rejects Cyclone	Cyclone Vent	2.0 lb/hr	None	0	2.0 lb/hr	8,760 hr/yr	8.760	0.35	3.066
Screen Building Rejects Cyclone to Chip Conveyor	Continuous Drop	30	7.8	0.00013 lb/ton	Covered	60	0.000051 lb/ton	994,734 TPY (m)	0.026	0.35	0.009
Fines Blower Emergency Storage Pile	Wind Erosion	None	0	0.00017	1.0	0.00017
Fines Blower Cyclone	Cyclone Vent	2.0 lb/hr	None	0	2.0 lb/hr	8,760 hr/yr	8.760	0.35	3.07
Fines Blower Cyclone to Wastewater/Skudge Conveyor	Continuous Drop	30	7.8	0.00013 lb/ton	Covered	60	0.000051 lb/ton	9,947 TPY (n)	0.010	0.35	0.000
Chip Conveyor to No. 5 Transfer Tower (2)	Continuous Drop	30	7.8	0.00013 lb/ton	Enclosed	80	0.000026 lb/ton	3,305,772 TPY (o)	0.043	0.35	0.015
TOTAL									44.61		16.29

NOTES:
 (a) Baton Drop and Continuous Drop Emission Factors are computed from AP 42 (US EPA, 1995) Section 13.2.4.3(1) E = 0.0032 x (U/5)^1.3 / (M/2)^1.4 lb/ton
 (b) Wind Erosion Emissions based on AP-42 (US EPA, 1995) Section 13.2.5. Refer to Attachment A for derivation
 (c) PM10 Size Multiplier is based on particles < 10 micrometers
 (d) Barkner emissions are based on Table 28 of NCASI Technical Bulletin No. 424 (March 1984) Fugitive Dust Emission Factors and Control Methods Important to Forest Products Industry Manufacturing Overlooks
 (e) Roundwood throughput is based on 456,800 cords/yr (softwood) @ 2.7 tons/cord and 178,000 cords/yr (hardwood) @ 2.85 tons/cord, plus 10 percent
 (f) Bark throughput is based on 16 percent of roundwood
 (g) Based on purchased bark
 (h) Total bark throughput is sum of manufactured bark and purchased bark
 (i) Vehicle miles traveled (VMT) was calculated assuming front end loader operating 12 hrs/day, 365 days/yr in the woodyard
 (j) Purchased chip throughput is based on 142,800 cords/yr (softwood) and 411,600 cords/yr (hardwood) @ 2.5 tons/cord plus 10 percent
 (k) Total chip throughput is based on 82 percent of roundwood throughput plus purchased chip throughput
 (l) Based on 70% of total chip throughput
 (m) Based on 30% of total chip throughput
 (n) Fines separated from wood chip stream
 (o) Total chips minus fines

Table 1. Maximum Woodyard Throughput Rates, SCC Panama City

Basis	cords/yr			tons/yr		
	Softwood	Hardwood	Total	Softwood	Hardwood	Total
			<u>Roundwood</u>			
PSD Application ^a	466,800	178,800	645,600	1,260,360	509,580	1,769,940
- plus 10%	46,680	17,880		126,036	50,958	176,994
- Total	513,480	196,680	710,160	1,386,396	560,538	1,946,934
			<u>Purchased Chips</u>			
PSD Application ^a	142,800	411,600	554,400	357,000	1,029,000	1,386,000
- plus 10%	14,280	41,160		35,700	102,900	138,600
- Total	157,080	452,760	609,840	392,700	1,131,900	1,524,600

Conversions: Purchased chips: 2.5 tons/cord

Roundwood: Softwood: 2.7 tons/cord

Hardwood: 2.85 tons/cord

Footnotes:

^a Reference "Supplemental Information for PSD Permit Application, Stone Container Corporation, Panama City, Florida"
(April 2000), prepared by Golder Associates Inc., Appendix A, Table A-6.