

**Mitchell, Bruce**

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**From:** Clements, Tom [TMCLEMEN@SMURFIT.COM]  
**Sent:** Wednesday, December 05, 2007 2:18 PM  
**To:** Mitchell, Bruce  
**Subject:** Permit Comments

Bruce

We have the following comments on the BART permit No. 0050009-027-AC. Could you please look them over and let me know if you agree with the proposed changes?

1. Page 2 of 3 "Brief Description", first line: "the total operational heat input limit of this emissions unit is 545 mmbtu/hr"- this is a 24 hour average. This line should read "the total operational heat input limit of this emissions unit is 545 mmbtu/hr (24 hour average)".
2. Page 2 of 3 "Brief Description", mid paragraph, the line "SO2 emissions are controlled when burning TRS or SOG and/or firing 100% fuel oil by maintaining a minimum pH of 8.0 in the wet scrubber" should be deleted. This is an obsolete condition, we now control SO2 using the CEM.
3. Specific condition 8 should reference Appendix GC, not "CC".

Please call me at (850) 785-4311 x470 if you have additional questions.

Sincerely, Tom Clements

12/11/2007

**Subsection B. This section addresses the following emissions unit.**

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
016	No. 4 Combination Boiler

This emission unit is the back-up control device for the Lime Kiln and the No. 3 Combination Boiler. Non-condensable gases (NCG) from the batch digesting system, multiple effect evaporator system and condensate stripper off-gases (SOG) are transported to this boiler for thermal destruction.

**The following specific conditions apply to the emissions unit listed above:**

**Essential Potential to Emit (PTE) Parameters**

**B.1. Capacity.** The total maximum operational heat input of this emissions unit is 545 MMBtu/hr based on a 24-hour average. The heat input shall not exceed 472 MMBtu/hr from fuel oil, 395 MMBtu/hr from coal, 474 MMBtu/hr from carbonaceous fuels, or 512 MMBtu/hr from natural gas. The total heat input to the No. 3 and No. 4 combination boilers due to carbonaceous fuels shall not exceed 501 MMBtu/hr based on a 24-hour average. {Permitting Note: The capacity limitations have been placed in the 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. and Construction Permit 0050009-008-AC]

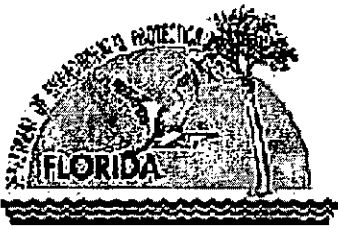
**B.2. Methods of Operation - Fuels.** This emissions unit may burn carbonaceous fuels (includes wood, bark and primary clarified wood fibers), coal (maximum of 1.7% sulfur by weight), natural gas and No. 2 or 6 fuel oil (maximum of 2.4% sulfur by weight). Records of the sulfur content for each shipment of fuel oil and coal shall be maintained and available for inspection by the Department. On-site blending of fuel oil to achieve the sulfur standard is prohibited. [Note: carbonaceous fuel consumption rates shall be expressed on a dry solids basis]. [Rules 62-4.160(2) and 62-213.440(1), F.A.C.]

**B.3. Hours of Operation.** This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

**Emission Limitations and Standards**

{Permitting Note: Unless otherwise specified, the averaging time is based on the specified averaging time of the applicable test method.}

**B.4. Particulate Matter.** Particulate matter emissions shall not exceed 0.1 pound per MMBtu of heat input from fossil fuel firing, and 0.3 pound per MMBtu heat input from carbonaceous fuels, or 86.7 pounds per hour. [Rule 62-296.410(1)(b)2, F.A.C., and Construction Permit 0050009-013-AC]



# Department of Environmental Protection

Jeb Bush  
Governor

Northwest District  
160 Governmental Center  
Pensacola, Florida 32502

Colleen Castille  
Secretary

## PERMITTEE:

Smurfit-Stone Container Enterprises, Inc.  
One Everitt Avenue  
Panama City, FL 32402

*Authorized Representative:*

Mr. B.G. Sammons, General Manager

Panama City Mill Air Permit No. 0050009-024-AC Facility ID No. 0050009 SIC No. 26 Permit Expires: April 5, 2007
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## FACILITY AND LOCATION

Smurfit Stone Corporation's Panama City Mill is an existing facility located One Everitt Avenue in Panama City, Bay County, Florida. The UTM coordinates are Zone 16, 632.8 km East, and 3335.1 km North.

## REGULATORY CLASSIFICATION

Title III: The existing facility is a major source of hazardous air pollutants (HAP).

Title IV: The existing facility has no units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution (Chapter 62-213, F.A.C.).

PSD: The existing facility is a PSD-major source of air pollution (Rule 62-212.400, F.A.C.).

## SPECIFIC CONDITIONS

1. Previous Permits: This permit supplements all previously issued air construction and operation permits for this emissions unit. Except for the change noted below, the unit remains subject to the conditions of all other valid air construction and operations permits. [Rule 62-4.070, F.A.C.]
2. No. 4 Combination Boiler (Emissions Unit No. 016): This unit is an existing combination boiler and is authorized to fire wood/bark, coal, fuel oil, and natural gas. The No. 3 or 4 Combination Boiler may be utilized to destroy HAP or TRS emissions in the condensate stripper off-gases (SOG). Existing air pollution controls include an overfire air (OFA) system and a variable throat venturi wet scrubber. Sulfur dioxide (SO<sub>2</sub>) emissions from this unit shall not exceed the following: limited to 772 lb/hr when not burning NCG or SOG, to 1,174 lb/hr when burning SOG but not NCG, 1,183 lb/hr when burning NCG but not SOG, and 1,183 lb/hr when burning NCG and SOG. In addition, SO<sub>2</sub> emissions shall be continuously monitored and recorded. The permittee shall maintain a scrubber pH of 8.0 or greater (24-hour average) during times when the continuous monitor is being repaired and/or calibrated. Monitoring records shall be maintained and available for inspection by the Department. This requirement supersedes the SO<sub>2</sub> standards in Specific Conditions B.5 and B.14 of Air Construction Permit No. 0050009-008-AC as amended. *{Permitting Note: These changes do not result in any increases in actual or potential emissions. All other standards of Air Permit Nos. 0050009-008-AC and 0050009-020-AV remain unaffected.}*

## STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.).

Executed in Pensacola, Florida.

/s/

\_\_\_\_\_  
Sandra F. Veazey  
Air Program Administrator

April 5, 2006  
Date

# Florida Freedom Newspapers, Inc.

PUBLISHERS OF THE NEWS HERALD  
Panama City, Bay County, Florida  
Published Daily

## State of Florida County of Bay

Before the undersigned authority appeared Glenda Sullivan, who on oath says that she is Classified In-Column Manager of The News Herald, a daily newspaper published at Panama City, in Bay County, Florida; that the attached copy of advertisement, being a Legal Advertisement - #6004 in the matter of Public Notice of Intent to Issue an Air Construction Permit - Panama City Mill in the Bay County Court, was published in said newspaper in the issue of November 29, 2007

Affiant further says that The News Herald is a direct successor of the Panama City News and that this publication, together with its direct predecessor, has been continuously published in said Bay County, Florida, each day (except that the predecessor, Panama City News, was not published on Sundays), and that this publication together with its said predecessor, has been entered as periodicals matter at the post office in Panama City, in said Bay County, Florida, for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that he or she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

State of Florida  
County of Bay

Sworn and subscribed before me this 29th day of November, A.D., 2007, by Glenda Sullivan, Classified In-Column Manager of The News Herald, who is personally known to me or has produced N/A as identification.



*Marie L. Forrest*  
Notary Public, State of Florida at Large

6004  
PUBLIC NOTICE OF  
INTENT TO ISSUE AN  
AIR CONSTRUCTION  
PERMIT

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Permit No.  
0050009-027-AC

Smurfit-Stone Container  
Enterprises, Inc.  
Panama City Mill  
Bay County

**Applicant:** The applicant for this project is Smurfit-Stone Container Enterprises, Inc., Panama City Mill. The applicant's Responsible Official and Authorized Representative is Mr. B. G. Sammons, General Manager, Smurfit-Stone Container Enterprises, Inc.

**Facility Location:** The applicant operates the existing Panama City Mill, which is located at One Everitt Avenue, Panama City, Bay County.

**Project:** The Panama City Mill operates several existing emissions units potentially subject to Rule 62-296.340, Florida Administrative Code (F.A.C.), which requires a review for the Best Available Retrofit Technology (BART). However, the applicant proposes a new emissions standard of 690 pounds per hour of sulfur dioxide from the No. 4 combination boiler with compliance demonstrated by continuous emissions monitor. An air quality modeling analysis of the BART-eligible units indicates a maximum visibility impairment of 0.498 deciviews to the nearest Class I area (St. Marks National Wilderness Area). This is less than the regulatory threshold of 0.5 deciviews, which exempts the facility from BART review.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is 111, South Magnolia Drive, Tallahassee, Florida

revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241; Facsimile: 850/245-2303). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period, shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information:

- The name and address of each agency affected, and each agency's file or identification number, if known;
- The name, address, and telephone number of the petitioner; the name, address and telephone

permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's phone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Technical Evaluation and Preliminary Determination, the Draft AC, the request/application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information, at the address and phone number listed above.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air construction permit (AC) to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The permitting authority will issue a Final Permit in accordance with the conditions of the attached Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be post-marked by the close of business (5:00 p.m.), on or before the end of this 14-day period by the Permitting Authority at the above address. If written comments result in a significant change to the Draft Permit, the Permitting Authority will issue a

Permitting Authority's action is based, must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of when and how each petitioner received notice of the agency action or proposed decision;

(d) A statement of all disputed issues of material fact;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

November 29, 2007