



0050009

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Panama City Mill
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December 2, 2008

Mr. Rick Bradburn
Air Program Administrator
Florida Dept. of Environmental Protection
160 Governmental Center, Room 308
Pensacola, FL 32502

0050009-631-AC (PSD-FL-388B)

MBC

Re: Stack Testing Reports

Dear Mr. Bradburn

Enclosed are two copies of the stack testing reports from October 20-23. All test results indicated compliance with our Title V limits. This annual testing included the compliance testing required by the petcoke permit (PSD-FL-388). This includes the certification testing of the new kiln NOx CEMS. This is the first time that we have ever certified a NSPS CEMS. If you see any issues with the attached documents, please let us know as soon as possible, so that we can make corrections and still meet the 300 day deadline for certification.

One item to note is that the kiln NOx ppm was above the permit limit for a short period while we were running at maximum production during the testing. The limit is 190 ppm, and the test indicated 194 ppm. Compliance is determined by a 30 day rolling average for NOx, which we met. The daily average for that day was 186 ppm, and the 30 day rolling average was 157 ppm. With the outage, the reports were lost internally for a period. There are a couple of hand entered corrections, since we do not have time to get pages modified and still meet the 45 day submission deadline. A table including SO2, NOx, and scrubber pH is also attached.

The kiln scrubber pH testing was conducted as well. We were well within our permit limits, at 2.1 lbs/hour. The limit is 18.8 lbs/hr. A summary of the average pH per run is also attached. As per the approved plan, we attempted to lower the scrubber pH by adding fresh water. This was not very successful due to the high operating loads we were running for the stack testing. The minimum run average pH was 7.7. There is some concern that this may be too high for operation at lower loads. If this turns out to be the case, we would re-run the test. As of now, we would propose a minimum scrubber pH of 7.7, tested continuously (minimum of every 15 minutes), compliance with this surrogate parameter based on a 3 hour average.

In order to ensure that the reports are complete, I've required the testing firm to complete the report to the checklist from 62-297.310(8). I'm not sure if the report has sufficient detail for item #6 - Type of pollution control device. I've attached additional information just in case. All of our pollution control devices are in good operating condition.

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By the signature below I certify that to the best of my knowledge and belief, all of the enclosed reports are true and correct.

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

Sincerely

A handwritten signature in black ink, appearing to read "Tom Clements".

Tom Clements
Environmental Mgr.

Pollution Control Devices
SSCC – Panama City Mill
Panama City Florida

EU001 #1 Recovery Boiler

The control device consists of an electrostatic precipitator for particulate matter control. A continuous opacity monitor eliminates the need for surrogate control device parameters.

EU004 Lime Kiln

The control device consists of a venturi wet scrubber manufactured by Chemco. Typically, minimum bull nozzle flow is 750 gpm, minimum tangential nozzle flow is 750, and minimum d/p is 27. The flows are higher than listed in the permit, but since this is where we normally stack test, we consider them our permit limit. Typical d/p is 27+. Normal flows are above 1000 gpm.

EU005 Lime Slaker

The control device is a wet wall cyclone scrubber. Typically, minimum scrubber flow is 30 gpm, normal is 35 gpm.

EU015 #3 Combination Boiler

The control devices consist of a fly ash arrester followed by a FMC wet scrubber. The differential pressure was recorded and is available in the report. Typically, minimum scrubber flow is 1026 gpm. Normal flow is several hundred gpm higher.

EU016 #4 Combination Boiler

The control devices consist of a fly ash arrester followed by a FMC wet scrubber. The differential pressure was recorded and is available in the report. Typically minimum scrubber flow is 1096 gpm. Normal flow is several hundred gpm higher.

EU019 #2 Recovery Boiler

The control device consists of an electrostatic precipitator for particulate matter control. A continuous opacity monitor eliminates the need for surrogate control device parameters.

EU020 #2 Smelt Dissolving Tank

The control device consists of a venturi scrubber. Typically minimum scrubber flow is 325 gpm, and the d/p range is from 7 to 11 inches of water. We normally operate above 400 gpm, and within the d/p range.

EU021 #1 Smelt Dissolving Tank

The control device consists of a venturi scrubber. Typically, minimum scrubber flow is 325 gpm, and the d/p range is from 7 to 11 inches of water. We normally operate above 400 gpm, and within the d/p range

Minute Ending...	115_LK_ScrubberpH_PV			
10/23/2008 13:57	8.11			
10/23/2008 13:58	8.11			
10/23/2008 13:59	8.10			
10/23/2008 14:00	8.09			
10/23/2008 14:01	8.08			
10/23/2008 14:02	8.08			
10/23/2008 14:03	8.07			
10/23/2008 14:04	8.06			
10/23/2008 14:05	8.05			
10/23/2008 14:06	8.04		8.04	Run 1
10/23/2008 14:07	8.04			
10/23/2008 14:08	8.03			
10/23/2008 14:09	8.02			
10/23/2008 14:10	8.01			
10/23/2008 14:11	8.00			
10/23/2008 14:12	8.00			
10/23/2008 14:13	7.99			
10/23/2008 14:14	7.98			
10/23/2008 14:15	7.97			
10/23/2008 14:16	7.97			
10/23/2008 14:17	7.96			
10/23/2008 14:18	7.95			
10/23/2008 14:19	7.94			
10/23/2008 14:20	7.93			
10/23/2008 14:21	7.93			
10/23/2008 14:22	7.92			
10/23/2008 14:23	7.91			
10/23/2008 14:24	7.89			
10/23/2008 14:25	7.86			
10/23/2008 14:26	7.83			
10/23/2008 14:27	7.80			
10/23/2008 14:28	7.77			
10/23/2008 14:29	7.74			
10/23/2008 14:30	7.71			
10/23/2008 14:31	7.69			
10/23/2008 14:32	7.69			
10/23/2008 14:33	7.69			
10/23/2008 14:34	7.69			
10/23/2008 14:35	7.70			
10/23/2008 14:36	7.70			
10/23/2008 14:37	7.70			
10/23/2008 14:38	7.70			
10/23/2008 14:39	7.70			
10/23/2008 14:40	7.71			
10/23/2008 14:41	7.71			
10/23/2008 14:42	7.71			
10/23/2008 14:43	7.71			
10/23/2008 14:44	7.71			
10/23/2008 14:45	7.71			
10/23/2008 14:46	7.72			

10/23/2008 14:47	7.72			
10/23/2008 14:48	7.72			
10/23/2008 14:49	7.72			
10/23/2008 14:50	7.72			
10/23/2008 14:51	7.73			
10/23/2008 14:52	7.73			
10/23/2008 14:53	7.73			
10/23/2008 14:54	7.73			
10/23/2008 14:55	7.73			
10/23/2008 14:56	7.74			
10/23/2008 14:57	7.74		7.74	Run 2
10/23/2008 14:58	7.74			
10/23/2008 14:59	7.74			
10/23/2008 15:00	7.74			
10/23/2008 15:01	7.74			
10/23/2008 15:02	7.75			
10/23/2008 15:03	7.75			
10/23/2008 15:04	7.75			
10/23/2008 15:05	7.75			
10/23/2008 15:06	7.75			
10/23/2008 15:07	7.76			
10/23/2008 15:08	7.76			
10/23/2008 15:09	7.76			
10/23/2008 15:10	7.76			
10/23/2008 15:11	7.76			
10/23/2008 15:12	7.77			
10/23/2008 15:13	7.77			
10/23/2008 15:14	7.77			
10/23/2008 15:15	7.77			
10/23/2008 15:16	7.77			
10/23/2008 15:17	7.77			
10/23/2008 15:18	7.78			
10/23/2008 15:19	7.78			
10/23/2008 15:20	7.78			
10/23/2008 15:21	7.78			
10/23/2008 15:22	7.78			
10/23/2008 15:23	7.79			
10/23/2008 15:24	7.79			
10/23/2008 15:25	7.79			
10/23/2008 15:26	7.79			
10/23/2008 15:27	7.79			
10/23/2008 15:28	7.79			
10/23/2008 15:29	7.80			
10/23/2008 15:30	7.80			
10/23/2008 15:31	7.80			
10/23/2008 15:32	7.80			
10/23/2008 15:33	7.80			
10/23/2008 15:34	7.81			
10/23/2008 15:35	7.81			
10/23/2008 15:36	7.81			
10/23/2008 15:37	7.81			

10/23/2008 15:38	7.81			
10/23/2008 15:39	7.82			
10/23/2008 15:40	7.82			
10/23/2008 15:41	7.82			
10/23/2008 15:42	7.82			
10/23/2008 15:43	7.82			
10/23/2008 15:44	7.82			
10/23/2008 15:45	7.83			
10/23/2008 15:46	7.83			
10/23/2008 15:47	7.83			
10/23/2008 15:48	7.83			
10/23/2008 15:49	7.83			
10/23/2008 15:50	7.84			
10/23/2008 15:51	7.84			
10/23/2008 15:52	7.84			
10/23/2008 15:53	7.84			
10/23/2008 15:54	7.84			
10/23/2008 15:55	7.84			
10/23/2008 15:56	7.85			
10/23/2008 15:57	7.85			
10/23/2008 15:58	7.85			
10/23/2008 15:59	7.85			
10/23/2008 16:00	7.85			
10/23/2008 16:01	7.86			
10/23/2008 16:02	7.86		7.99	Run 3
10/23/2008 16:03	7.86			
10/23/2008 16:04	7.86			
10/23/2008 16:05	7.86			
10/23/2008 16:06	7.87			
10/23/2008 16:07	7.87			
10/23/2008 16:08	7.87			
10/23/2008 16:09	7.87			
10/23/2008 16:10	7.87			
10/23/2008 16:11	7.87			
10/23/2008 16:12	7.88			
10/23/2008 16:13	7.88			
10/23/2008 16:14	7.88			
10/23/2008 16:15	7.88			
10/23/2008 16:16	7.88			
10/23/2008 16:17	7.89			
10/23/2008 16:18	7.89			
10/23/2008 16:19	7.89			
10/23/2008 16:20	7.89			
10/23/2008 16:21	7.89			
10/23/2008 16:22	7.89			
10/23/2008 16:23	7.90			
10/23/2008 16:24	7.90			
10/23/2008 16:25	7.90			
10/23/2008 16:26	7.90			
10/23/2008 16:27	7.90			
10/23/2008 16:28	7.91		8.01	Run 4

10/23/2008 16:29	7.91			
10/23/2008 16:30	7.91			
10/23/2008 16:31	7.91			
10/23/2008 16:32	7.91			
10/23/2008 16:33	7.92			
10/23/2008 16:34	7.92			
10/23/2008 16:35	7.92			
10/23/2008 16:36	7.92			
10/23/2008 16:37	7.92			
10/23/2008 16:38	7.92			
10/23/2008 16:39	7.93			
10/23/2008 16:40	7.93			
10/23/2008 16:41	7.93			
10/23/2008 16:42	7.93			
10/23/2008 16:43	7.93			
10/23/2008 16:44	7.94			
10/23/2008 16:45	7.94			
10/23/2008 16:46	7.94			
10/23/2008 16:47	7.94			
10/23/2008 16:48	7.94			
10/23/2008 16:49	7.95			
10/23/2008 16:50	7.95			
10/23/2008 16:51	7.95			
10/23/2008 16:52	7.95			
10/23/2008 16:53	7.95			
10/23/2008 16:54	7.95			
10/23/2008 16:55	7.96			
10/23/2008 16:56	7.96			
10/23/2008 16:57	7.96			
10/23/2008 16:58	7.96			
10/23/2008 16:59	7.96			
10/23/2008 17:00	7.97			
10/23/2008 17:01	7.97			
10/23/2008 17:02	7.97		8.03	Run 5
10/23/2008 17:03	7.97			
10/23/2008 17:04	7.97			
10/23/2008 17:05	7.97			
10/23/2008 17:06	7.98			
10/23/2008 17:07	7.98			
10/23/2008 17:08	7.98			
10/23/2008 17:09	7.98			
10/23/2008 17:10	7.98			
10/23/2008 17:11	7.99			
10/23/2008 17:12	7.99			
10/23/2008 17:13	7.99			
10/23/2008 17:14	7.99			
10/23/2008 17:15	7.99			
10/23/2008 17:16	8.00			
10/23/2008 17:17	8.00			
10/23/2008 17:18	8.00			
10/23/2008 17:19	8.00			

10/23/2008 17:20	8.00			
10/23/2008 17:21	8.00			
10/23/2008 17:22	8.01			
10/23/2008 17:23	8.01			
10/23/2008 17:24	8.01			
10/23/2008 17:25	8.01			
10/23/2008 17:26	8.01			
10/23/2008 17:27	8.02			
10/23/2008 17:28	8.02			
10/23/2008 17:29	8.02			
10/23/2008 17:30	8.02			
10/23/2008 17:31	8.02			
10/23/2008 17:32	8.02			
10/23/2008 17:33	8.03	8.04	Run 6	
10/23/2008 17:34	8.03			
10/23/2008 17:35	8.03			
10/23/2008 17:36	8.03			
10/23/2008 17:37	8.03			
10/23/2008 17:38	8.04			
10/23/2008 17:39	8.04			
10/23/2008 17:40	8.04			
10/23/2008 17:41	8.04			
10/23/2008 17:42	8.04			
10/23/2008 17:43	8.05			
10/23/2008 17:44	8.05			
10/23/2008 17:45	8.05			
10/23/2008 17:46	8.05			
10/23/2008 17:47	8.05			
10/23/2008 17:48	8.05			
10/23/2008 17:49	8.06			
10/23/2008 17:50	8.06			
10/23/2008 17:51	8.06			
10/23/2008 17:52	8.06			
10/23/2008 17:53	8.06			
10/23/2008 17:54	8.07			
10/23/2008 17:55	8.07			
10/23/2008 17:56	8.07			
10/23/2008 17:57	8.07	8.04	Run 7	
10/23/2008 17:58	8.07			
10/23/2008 17:59	8.07			
10/23/2008 18:00	8.07			
10/23/2008 18:01	8.07			
10/23/2008 18:02	8.07			
10/23/2008 18:03	8.07			
10/23/2008 18:04	8.07			
10/23/2008 18:05	8.07			
10/23/2008 18:06	8.07			
10/23/2008 18:07	8.07			
10/23/2008 18:08	8.07			
10/23/2008 18:09	8.06			
10/23/2008 18:10	8.06			

10/23/2008 18:11	8.06			
10/23/2008 18:12	8.06			
10/23/2008 18:13	8.06			
10/23/2008 18:14	8.06			
10/23/2008 18:15	8.06			
10/23/2008 18:16	8.06			
10/23/2008 18:17	8.06			
10/23/2008 18:18	8.06			
10/23/2008 18:19	8.06			
10/23/2008 18:20	8.06			
10/23/2008 18:21	8.05			
10/23/2008 18:22	8.05			
10/23/2008 18:23	8.05			
10/23/2008 18:24	8.05			
10/23/2008 18:25	8.05			
10/23/2008 18:26	8.05			
10/23/2008 18:27	8.05			
10/23/2008 18:28	8.05			
10/23/2008 18:29	8.05			
10/23/2008 18:30	8.05			
10/23/2008 18:31	8.05	8.03		Run 8
10/23/2008 18:32	8.05			
10/23/2008 18:33	8.04			
10/23/2008 18:34	8.04			
10/23/2008 18:35	8.04			
10/23/2008 18:36	8.04			
10/23/2008 18:37	8.04			
10/23/2008 18:38	8.04			
10/23/2008 18:39	8.04			
10/23/2008 18:40	8.04			
10/23/2008 18:41	8.04			
10/23/2008 18:42	8.04			
10/23/2008 18:43	8.04			
10/23/2008 18:44	8.04			
10/23/2008 18:45	8.04			
10/23/2008 18:46	8.03			
10/23/2008 18:47	8.03			
10/23/2008 18:48	8.03			
10/23/2008 18:49	8.03			
10/23/2008 18:50	8.03			
10/23/2008 18:51	8.03			
10/23/2008 18:52	8.03			
10/23/2008 18:53	8.03			
10/23/2008 18:54	8.03			
10/23/2008 18:55	8.03			
10/23/2008 18:56	8.03			
10/23/2008 18:57	8.03			
10/23/2008 18:58	8.02			
10/23/2008 18:59	8.02	8.02		Run 9
10/23/2008 19:00	8.02			
10/23/2008 19:01	8.02			

10/23/2008 19:02	8.02			
10/23/2008 19:03	8.02			
10/23/2008 19:04	8.02			
10/23/2008 19:05	8.02			
10/23/2008 19:06	8.02			
10/23/2008 19:07	8.02			
10/23/2008 19:08	8.02			
10/23/2008 19:09	8.02			
10/23/2008 19:10	8.01			
	7.93	Average		