

Memorandum

Florida Department of Environmental Protection

TO: Joe Kahn

THRU: Trina Vielhauer *TV*

THRU: Jeff Koerns *JK*

FROM: Bruce Mitchell *BM*

DATE: March 26, 2008

SUBJECT: Smurfit-Stone Container Enterprises, Inc.
Panama City Mill
Final Air Construction Permit
0050009-029-AC/PSD-FL-388A

Attached is the Final Air Construction Permit for the Panama City Mill located at One Everitt Avenue, Panama City, Bay County. The purpose of the permitting action is to revise the sulfur dioxide (SO₂) emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis pursuant to Condition 2 in Subsection 3C of original Permit PSD-FL-388.

No comments were received during the Public Notice period. Therefore, it is recommended that the Final Air Construction Permit be signed and issued as noticed.

Attachments

JK/tlv/jfk/rbm

FINAL DETERMINATION

PERMITTEE

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

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation, New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. PSD-FL-388A
Project No. 0050009-029-AC
Panama City Mill

The PSD air construction permit authorizes a revision to the sulfur dioxide emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis pursuant to Condition 2 in Subsection 3C of original Permit PSD-FL-388.

NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Permit package on February 11, 2008. The applicant published the Public Notice of Intent to Issue in the The News Herald on February 19, 2008. The Department received the proof of publication on February 29, 2008.

COMMENTS

No comments on the Draft Permit were received from the public, the Department's Northeast District Office, the EPA Region 4 Office, the National Park Service, or the applicant.

CONCLUSION

The final action of the Department is to issue the permit as noticed.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

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

Air Permit No. PSD-FL-388A
Project No. 0050009-029-AC
Panama City Mill
Nos. 3 and 4 Combination Boiler
Modifications
Bay County

Authorized Representative:
Mr. B. G. Sammons, General Manager

Enclosed is the final PSD air construction permit, which authorizes a revision to the sulfur dioxide emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis pursuant to Condition 2 in Subsection 3C of original Permit PSD-FL-388. The proposed changes will be conducted at the existing kraft mill, which is located in Bay County at One Everitt Avenue in Panama City, Florida. As noted in the Final Determination, there were no changes made to the permit as drafted. This permit is issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit and Final Determination) was sent by electronic mail with received receipt requested to the persons listed below.

Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc. (bsammons@smurfit.com)

Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc. (tmclemen@smurfit.com)

Mr. David Buff, Golder Associates (dbuff@golder.com)

Mr. Rick Bradburn, NWD Office (rick.bradburn@dep.state.fl.us)

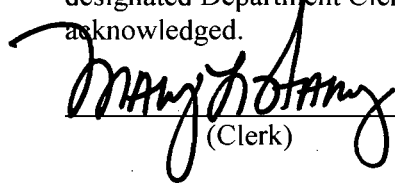
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)

Mr. Jim Little, EPA Region 4 (little.james@epa.gov)

Mr. Dee Morse, National Park Service (Dee_Morse@nps.gov)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

4/1/08

(Date)

SECTION 1. GENERAL INFORMATION

Nos. 3 and 4 Combination Boilers

FACILITY AND PROJECT DESCRIPTION

The permittee operates an existing Kraft process pulp and paper mill in Panama City. The existing mill is comprised of major activities areas such as: wood handling facility; pulping, bleaching, and chemical recovery; power house operations; paper machines; finishing, shipping, and warehouse operations; and other associated processes and equipment. This project establishes revised 3-hour and 24-hour SO₂ emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis. This project affects the following existing emissions units.

EU No.	Emissions Unit Description
015	No. 3 Combination Boiler
016	No. 4 Combination Boiler

REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants.
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400 (PSD), F.A.C.

RELEVANT DOCUMENTS

December 19, 2007 Application and revised SO₂ modeling analysis received.

SECTION 2. REVISED PERMIT CONDITIONS

Nos. 3 and 4 Combination Boilers

This permitting action revises the following conditions in Subsection 3C of original Permit PSD-FL-388 (Project No. 0050009-028-AC). All other conditions remain unchanged.

This section of the permit addresses the following emissions units.

EU No.	Description
-015	No. 3 Combination Boiler
-016	No. 4 Combination Boiler

EQUIPMENT

1. Enclosure for Recovery Boiler Building: The permittee is authorized to construct an enclosure for the recovery boiler building to reduce corrosion and maintenance. The enclosure will be implemented in two phases. The first phase will add one wall along the east side of the building. The second phase will add a second wall along the south side of the building and may eventually include enclosing the entire building. [Rule 62-212.400(BACT), F.A.C. and Application No. 0050009-028-AC]

EMISSIONS STANDARDS

2. New SO₂ Standards: The following new SO₂ emissions standards apply to the Nos. 3 and 4 combination boilers in addition to any existing SO₂ emissions standards.
 - a. SO₂ emissions shall not exceed 1366 lb/hour when only the No. 3 combination boiler is operating based on a 3-hour rolling CEMS average.
 - b. The combined SO₂ emissions from No. 3 and No. 4 combination boilers shall not exceed 1658 lb/hr when both Nos. 3 and 4 are operating and the SO₂ emissions from No. 4 shall not exceed 1183 lb/hr based on 3-hour rolling CEMS averages.
 - c. SO₂ emissions shall not exceed 907 lb/hour when only the No. 3 combination boiler is operating based on a 24-hour rolling CEMS average.
 - d. SO₂ emissions shall not exceed 690 lb/hour when only the No. 4 combination boiler is operating based on a 24-hour rolling CEMS average. [Rule 62-296.340(BART), F.A.C. and 0050009-027-AC]
 - e. When both Nos. 3 and 4 combination boilers are operating, SO₂ emissions from No. 3 shall not exceed 329 lb/hr and the SO₂ emissions from No. 4 shall not exceed 643 lb/hr based on 24-hour rolling CEMS averages.

{Permitting Note: The new enclosure adversely affects dispersion of the existing stack plumes. The new SO₂ emissions standards are based on the revised air quality analysis provided in support of the PSD application.}
[Rules 62-212.400(BACT) and 62-296.340(BART), F.A.C.; and Application Nos. 0050009-027-AC, 0050009-028-AC and 0050009-029-AC]



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE

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

Authorized Representative:

Mr. B. G. Sammons, General Manager

Permit No. PSD-FL-388A
Project No. 0050009-029-AC
Expires: December 1, 2008
Facility ID No. 0050009
SIC Nos. 2611 and 2621
Nos. 3 and 4 Combination Boilers

FACILITY AND LOCATION

This permit establishes revised sulfur dioxide (SO₂) emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis pursuant to Condition 2 in Subsection 3C of original Permit PSD-FL-388. The existing Panama City mill is classified as a major stationary source, a Title V facility and major source of hazardous air pollutants (HAP). The facility is a Kraft process pulp and paper mill consisting of the following major activities: wood handling facility; pulping, bleaching, and chemical recovery; power house operations; paper machines; finishing, shipping, and warehouse operations; and other associated processes and equipment. The UTM coordinates are Zone 16, 632.8 km East, and 3335.1 km North.

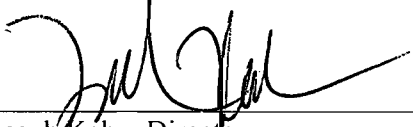
STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, Florida Administrative Code (F.A.C.). The permittee is authorized to make the proposed changes in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

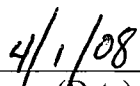
CONTENTS

- Section 1. General Information
- Section 2. Revised Permit Conditions

Executed in Tallahassee, Florida.



Joseph Kahn, Director
Division of Air Resource Management



(Date)

Harvey, Mary

From: Harvey, Mary
Sent: Tuesday, April 01, 2008 3:13 PM
To: 'Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc.'; 'Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc.'; 'David Buff, P.E. of Record, Golder Associates, Inc.'; Bradburn, Rick; 'Katy Forney, EPA Region 4'; 'Jim Little, EPA Region 4'; 'Dee Morse, NPS'
Cc: Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: FINAL PERMIT #0050009-029-AC/PSD-FL-388A
Attachments: Document - 0050009-029-AC- FINAL.pdf

Tracking:	Recipient	Delivery	Read
	'Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc.'		
	'Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc.'		
	'David Buff, P.E. of Record, Golder Associates, Inc.'		
	Bradburn, Rick	Delivered: 4/1/2008 3:13 PM	Read: 4/2/2008 8:34 AM
	'Katy Forney, EPA Region 4'		
	'Jim Little, EPA Region 4'		
	'Dee Morse, NPS'		
	Mitchell, Bruce	Delivered: 4/1/2008 3:13 PM	
	Walker, Elizabeth (AIR)	Delivered: 4/1/2008 3:13 PM	
	Gibson, Victoria	Delivered: 4/1/2008 3:13 PM	Read: 4/1/2008 3:19 PM

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

4/3/2008

Harvey, Mary

From: Dee_Morse@nps.gov
Sent: Tuesday, April 01, 2008 6:30 PM
To: Harvey, Mary
Subject: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

Return Receipt

Your document: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

was received by: Dee Morse/DENVER/NPS

at: 04/01/2008 04:29:15 PM

Harvey, Mary

From: Bradburn, Rick
To: Harvey, Mary
Sent: Wednesday, April 02, 2008 8:34 AM
Subject: Read: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

Your message

To: 'Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc.>'; 'Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc.>'; 'David Buff, P.E. of Record, Golder Associates, Inc.>'; Bradburn, Rick; 'Katy Forney, EPA Region 4'; 'Jim Little, EPA Region 4'; 'Dee Morse, NPS'
Cc: Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: FINAL PERMIT #0050009-029-AC/PSD-FL-388A
Sent: 4/1/2008 3:13 PM

was read on 4/2/2008 8:34 AM.

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Tuesday, April 01, 2008 3:19 PM
Subject: Read: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

Your message

To: 'Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc.'; 'Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc.'; 'David Buff, P.E. of Record, Golder Associates, Inc.'; Bradburn, Rick; 'Katy Forney, EPA Region 4'; 'Jim Little, EPA Region 4'; 'Dee Morse, NPS'
Cc: Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: FINAL PERMIT #0050009-029-AC/PSD-FL-388A
Sent: 4/1/2008 3:13 PM

was read on 4/1/2008 3:19 PM.

Harvey, Mary

From: Buff, Dave [DBuff@GOLDER.com]
To: undisclosed-recipients
Sent: Tuesday, April 01, 2008 3:42 PM
Subject: Read: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

Your message

To: DBuff@GOLDER.com
Subject:

was read on 4/1/2008 3:42 PM.

Harvey, Mary

From: Sammons, Bob [BSAMMONS@SMURFIT.COM]
Sent: Tuesday, April 01, 2008 3:42 PM
To: Harvey, Mary
Subject: RE: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Tuesday, April 01, 2008 2:13 PM
To: Sammons, Bob; Clements, Tom; David Buff, P.E. of Record, Golder Associates, Inc.; Bradburn, Rick; Katy Forney, EPA Region 4; Jim Little, EPA Region 4; Dee Morse, NPS
Cc: Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

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Thank you,

DEP, Bureau of Air Regulation

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

Harvey, Mary

From: Sammons, Bob [BSAMMONS@SMURFIT.COM]
To: Harvey, Mary
Sent: Tuesday, April 01, 2008 3:41 PM
Subject: Read: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

Your message

To: BSAMMONS@SMURFIT.COM
Subject:

was read on 4/1/2008 3:41 PM.

Harvey, Mary

From: Clements, Tom [TMCLEMEN@SMURFIT.COM]
Sent: Tuesday, April 01, 2008 3:20 PM
To: Harvey, Mary
Cc: Sammons, Bob
Subject: RE: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

Message received, thank you
Tom Clements

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Tuesday, April 01, 2008 2:13 PM
To: Sammons, Bob; Clements, Tom; David Buff, P.E. of Record, Golder Associates, Inc.; Bradburn, Rick; Katy Forney, EPA Region 4; Jim Little, EPA Region 4; Dee Morse, NPS
Cc: Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

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DEP, Bureau of Air Regulation

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4/2/2008



Smurfit-Stone
Container Corporation
Panama City Mill
1 Everitt Ave.
Panama City, FL 32401
850-785-4311
850-763-8530 fax

February 27, 2008

Mr. Bruce Thomas, P.E.
Division of Air Resource Mgmt
Fl. Dept. of Environmental Protection
2600 Blair Stone Rd, MS #5505
Tallahassee, FL, 32399-2400

RECEIVED
FEB 29 2008
BUREAU OF AIR REGULATION

Re: Proof of Publication
Permit PSD-FL-388 2a
Project No.: 0050009-028-AC

Dear Mr. Thomas

Attached is the proof of publication for the public notice associated with the above permit. It ran on February 19, 2008. Please call me at (850) 785-4311 x470 if you have additional questions.

Sincerely

Tom Clements
Environmental Mgr.

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 - #6623 in the matter of Public Notice of Intent to Issue Air Permit - Smurfit-Stone Container in the Bay County Court, was published in said newspaper in the issue of February 19, 2008

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.

Glenda Sullivan

State of Florida
County of Bay

Sworn and subscribed before me this 19th day of February, A.D., 2008, 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



RECEIVED

FEB 29 2008

BUREAU OF AIR REGULATION

6623
**PUBLIC NOTICE OF
INTENT TO ISSUE
AIR PERMIT**

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Permit No. PSD-FL-388A, Project No. 0050009-029-AC
Smurfit-Stone Container Enterprises, Inc.
Panama City Mill
Bay County, Florida

Applicant: The applicant for this project is Smurfit-Stone Container Enterprises, Inc. The applicant's authorized representative and mailing address is: B. G. Sammons, General Manager, Smurfit-Stone Container Enterprises, Inc., Panama City Mill, One Everitt Avenue, Panama City, Florida 32402.

Facility Location: Smurfit-Stone Container Enterprises, Inc. operates the existing Panama City Mill, which is located in Bay County at One Everitt Avenue in Panama City, Florida 32402. The existing facility is a Kraft pulp and paper mill.

Project: On September 26, 2007, the Department issued Permit PSD-FL-388 (Project No. 0050009-028-AC) to authorize construction of a new burner system to fire petcoke in the No. 4 Lime Kiln and a new building enclosure for the recovery boilers. The project was subject to preconstruction review in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.) for the Prevention of Significant Deterioration (PSD). The draft permit for the original project was issued based on an air quality modeling analysis that did not include several increment consuming sources that should have been present. Prior to issuing the final permit, the applicant provided a supplemental air quality analysis based on the corrected source inventory, but that also corresponded with the PSD Class II increments which were identified in the public notice. To achieve the same level of PSD Class II increment consumption that was publicly noticed, the applicant accepted reduced sulfur dioxide (SO₂) emission standards for the Nos. 3 and 4 Combination Boilers in the final permit. However, the final permit also allowed the applicant to submit an application within 90 days of issuance to revise the reduced SO₂ emissions standards based on a corrected air quality analysis.

On December 19, 2007, the Department received an application pursuant to the permit condition requesting revised SO₂ emissions standards for

posed equipment will not adversely impact air quality and that the project will comply with all appropriate 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 proposed 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 30 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 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the Draft Permit, the Permitting Authority will issue a 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 at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. 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 this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the

based on a corrected air quality analysis.

On December 19, 2007, the Department received an application pursuant to the permit condition requesting revised SO2 emissions standards for the Nos. 3 and 4 Combination Boilers. For the revised project, all model input data remained the same as that used in the previous supplemental analysis except for the SO2 emission rates for the Nos. 3 and 4 Combination Boilers. Modeling runs were conducted to determine the maximum allowable SO2 emission rates that demonstrate compliance with the AAQS, and PSD Class II increments. The following table shows the revised maximum predicted SO2 increments consumed by all sources in the PSD Class II area (vicinity of the facility) including this project.

Pollutant: SO2	Averaging Time	Allowable Increment (ug/m3)	Consumed Increment (ug/m3)	Consumed (%)
	3-hour	512	510	99%
	24-hour	91	89	98%
	Annual	20	2	10%

In addition, there were no significant impacts predicted for the following PSD Class I areas: Bradwell Bay or St. Marks National Wilderness Areas located 96 and 112 kilometers east of the facility, respectively. Therefore, no PSD Class I increment consumption analyses were required for SO2 and nitrogen dioxide in these areas. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

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, 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 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. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone 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 Author.

BEST AVAILABLE COPY

120.60(3), F.S., must be filed within 14 days of publication of this Public Notice or receipt of a written notice, 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:

- (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 rights will be affected by the agency determination.
- (c) A statement of when and how the petitioner received notice of the agency action or proposed decision.
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so state.
- (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

facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

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, 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 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. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone 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 Draft Permit, the Technical Evaluation and Preliminary Determination, the 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. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of pro-

ceeding, and an explanation of how the petitioner's substantial rights will be affected by the agency determination.

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

(d) A statement of all disputed issues of material fact. If there are none, the petition must so state.

(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 Public 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 for this proceeding.
February 19, 2008



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 6, 2008

Electronically Sent – Return Receipt Requested

Mr. B. G. Sammons, General Manager
Smurfit-Stone Container Enterprises, Inc.
One Everitt Avenue
Panama City, Florida 32402

Re: Draft Air Permit No. PSD-FL-388A
Project No. 0050009-029-AC
Panama City Mill
Nos. 3 and 4 Combination Boilers
Revision of SO₂ Standards

Dear Mr. Sammons:

On December 19, 2007, Smurfit-Stone Container Enterprises, Inc. submitted an application for an air construction permit to revise the sulfur dioxide (SO₂) emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis pursuant to Condition 2 in Subsection 3C of original Permit PSD-FL-388. The proposed project is located at the existing Panama City Mill in Bay County at One Everitt Avenue, Panama City, Florida. Enclosed are the following documents:

- The Written Notice of Intent to Issue Air Permit provides important information regarding: the Bureau of Air Regulation's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Bureau of Air Regulation's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.
- The Technical Evaluation and Preliminary Determination summarizes the Bureau of Air Regulation's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft permit.
- The proposed Draft Permit includes the specific conditions that will regulate the emissions units covered by the proposed project.

If you have any questions, please contact the Project Engineer, Bruce Mitchell, at 850/413-9198, or the Project Meteorologist, Cleve Holladay, at 850/921-8986.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

TLV/jfk/bm

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

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

Draft Permit No. PSD-FL-388A
Project No. 0050009-029-AC
Panama City Mill
Nos. 3 and 4 Combination Boilers
Revised SO₂ Standards

Authorized Representative:

B. G. Sammons, General Manager

Facility Location: The applicant, Smurfit-Stone Container Enterprises, Inc., operates the existing Panama City Mill, which is located in Bay County at One Everitt Avenue, Panama City, Florida. The existing facility is a Kraft pulp and paper mill.

Project: On December 19, 2007, Smurfit-Stone Container Enterprises, Inc. submitted an application for an air construction permit to revise the sulfur dioxide (SO₂) emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis pursuant to Condition 2 in Subsection 3C of original Permit PSD-FL-388. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

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, 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 Bureau of Air Regulation'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 Bureau of Air Regulation'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 Draft Permit, the Technical Evaluation and Preliminary Determination, the 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 permit 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 proposed 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.

Public Notice: Pursuant to Section 403.815, F.S., and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the address or phone number listed above. Pursuant to Rules 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the Draft Permit for a period of 30 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 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly and in a newspaper of general circulation in the area affected by the

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the Draft Permit, the Permitting Authority will issue a 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; Fax: 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: (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.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by electronic mail with received receipt requested before the close of business on 2/11/08 to the persons listed below.

- Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc. (bsammons@smurfit.com)
- Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc. (tmclemen@smurfit.com)
- Mr. David Buff, Golder Associates (dbuff@golder.com)
- Mr. Rick Bradburn, NWD Office (rick.bradburn@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Mr. Jim Little, EPA Region 4 (little.james@epa.gov)
- Mr. Dee Morse, National Park Service (Dee_Morse@nps.gov)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated agency clerk, receipt of which is hereby acknowledged.

Mary L. Harvey
(Clerk)

2/11/08
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Permit No. PSD-FL-388A, Project No. 0050009-029-AC
Smurfit-Stone Container Enterprises, Inc.
Panama City Mill
Bay County, Florida

Applicant: The applicant for this project is Smurfit-Stone Container Enterprises, Inc. The applicant's authorized representative and mailing address is: B. G. Sammons, General Manager, Smurfit-Stone Container Enterprises, Inc., Panama City Mill, One Everitt Avenue, Panama City, Florida 32402.

Facility Location: Smurfit-Stone Container Enterprises, Inc. operates the existing Panama City Mill, which is located in Bay County at One Everitt Avenue in Panama City, Florida 32402. The existing facility is a Kraft pulp and paper mill.

Project: On September 26, 2007, the Department issued Permit PSD-FL-388 (Project No. 0050009-028-AC) to authorize construction of a new burner system to fire petcoke in the No. 4 Lime Kiln and a new building enclosure for the recovery boilers. The project was subject to preconstruction review in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.) for the Prevention of Significant Deterioration (PSD). The draft permit for the original project was issued based on an air quality modeling analysis that did not include several increment consuming sources that should have been present. Prior to issuing the final permit, the applicant provided a supplemental air quality analysis based on the corrected source inventory, but that also corresponded with the PSD Class II increments which were identified in the public notice. To achieve the same level of PSD Class II increment consumption that was publicly noticed, the applicant accepted reduced sulfur dioxide (SO₂) emission standards for the Nos. 3 and 4 Combination Boilers in the final permit. However, the final permit also allowed the applicant to submit an application within 90 days of issuance to revise the reduced SO₂ emissions standards based on a corrected air quality analysis.

On December 19, 2007, the Department received an application pursuant to the permit condition requesting revised SO₂ emissions standards for the Nos. 3 and 4 Combination Boilers. For the revised project, all model input data remained the same as that used in the previous supplemental analysis except for the SO₂ emission rates for the Nos. 3 and 4 Combination Boilers. Modeling runs were conducted to determine the maximum allowable SO₂ emission rates that demonstrate compliance with the AAQS and PSD Class II increments. The following table shows the revised maximum predicted SO₂ increments consumed by all sources in the PSD Class II area (vicinity of the facility) including this project.

Pollutant	Averaging Time	Allowable Increment ($\mu\text{g}/\text{m}^3$)	Increment Consumed ($\mu\text{g}/\text{m}^3$)	Increment Consumed (%)
SO ₂	3-hour	512	510	99%
	24-hour	91	89	98%
	Annual	20	2	10%

In addition, there were no significant impacts predicted for the following PSD Class I areas: Bradwell Bay or St. Marks National Wilderness Areas located 96 and 112 kilometers east of the facility, respectively. Therefore, no PSD Class I increment consumption analyses were required for SO₂ and nitrogen dioxide in these areas. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

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, 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 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,

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone 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 Draft Permit, the Technical Evaluation and Preliminary Determination, the 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. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate 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 proposed 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 30 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 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the Draft Permit, the Permitting Authority will issue a 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 at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. 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 this Public Notice or receipt of a written notice, 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: (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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

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 Public 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 for this proceeding.



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Smurfit-Stone Container Enterprises, Inc.
One Everitt Avenue
Panama City, Florida 32402
Panama City Mill
ARMS Facility ID No. 0050009

PROJECT

Draft Permit No. PSD-FL-388A
Project No. 0050009-029-AC
Modification of the Nos. 3 and 4 Combination Boilers

COUNTY

Bay County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

February 6, 2008

1. GENERAL PROJECT INFORMATION

Facility Description and Location

The facility is a Kraft pulp and paper mill with Standard Industrial Classification codes of SIC Nos. 2611 and 2621. The facility is located in Bay County at One Everitt Avenue in Panama City, Florida. The UTM coordinates are Zone 16, 632.8 km East, and 3335.1 km North. The existing mill is comprised of major activities areas such as: wood handling facility; pulping, bleaching, and chemical recovery; power house operations; paper machines; finishing, shipping, and warehouse operations; and other associated processes and equipment.

Primary Regulatory Categories

- The facility is a major source of hazardous air pollutants.
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, Florida Administrative Code (F.A.C.).
- The facility is a major stationary source in accordance with Rule 62-212.400 (PSD), F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

On September 26, 2007, the Department issued Permit PSD-FL-388 (Project No. 0050009-028-AC) to authorize construction of a new burner system to fire petcoke in the No. 4 Lime Kiln and a new building enclosure for the recovery boilers. To offset predicted downwash impacts from the new enclosure, the applicant requested reduced sulfur dioxide (SO₂) emissions standards for the Nos. 3 and 4 Combination Boilers. After the draft permit was issued, an error in the surrounding source inventory was discovered in the air quality modeling analysis. The final permit was issued because the modeled impacts were conservative; however, the following was added to Condition 2 in Subsection 3C of the final permit, "Within 90 days of issuance of this permit, the permittee may submit an application to revise the above SO₂ emissions standards based on a revised modeling analysis." On December 19, 2007, the Department received an application pursuant to the above permit condition requesting revised SO₂ emissions standards in original Permit PSD-FL-388 for the Nos. 3 and 4 Combination Boilers based on a corrected air quality analysis. Only the Nos. 3 and 4 Combination Boilers (EU-015 and EU-016) are affected by this project. Also, in air construction permit project No. 0050009-027-AC, issued December 20, 2007, the permittee accepted an emissions limit for SO₂ for the No. 4 Combination Boiler to be exempted from the regulations of Best Available Retrofit Technology (BART) at Rule 62-296.340, F.A.C. That SO₂ emissions standard is "shall not exceed 690 pounds per hour (lb/hour) when only the No. 4 Combination Boiler is operating based on a 24-hour rolling continuous emissions monitoring system (CEMS) average." This standard will not be changed.

2. APPLICABLE REGULATIONS

Except for the revised SO₂ emissions standards, this project does not impose any new state or federal requirements. The facility is a major stationary source of air pollution subject to preconstruction review in accordance with Rule 62-212.400, F.A.C., for the PSD. The original project (PSD-FL-388) was subject to PSD review for the No. 4 Lime Kiln. This permit revises the SO₂ emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality analysis and is not otherwise subject to PSD review.

3. AIR QUALITY ANALYSIS

The original project (PSD-FL-388) for the No. 4 Lime Kiln resulted in PSD significant emissions increases for SO₂ and nitrogen oxides. As allowed by Condition 2 in Subsection 3C of the original permit (PSD-FL-388), this project revises the permitted SO₂ emission rates for the Nos. 3 and 4 Combination Boilers based on a corrected air quality analysis to demonstrate compliance with ambient air quality standards (AAQS) and PSD Class II

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

increments. Details of the original modeling analysis and procedures are provided in the Technical Evaluation and Preliminary Determination (TEPD) and supporting application for Permit PSD-FL-388 (Project No. 0050009-28-AC), which authorized the No. 4 Lime Kiln petcoke project.

The draft permit for the original project was issued based on a modeling analysis that did not include two increment consuming sources at Arizona Chemicals' facility that should have been present. Prior to issuing the final permit, the applicant provided a supplemental air quality analysis based on the corrected source inventory, but that also corresponded with the PSD Class II increments which were identified in the public notice. To achieve the same level of PSD Class II increment consumption that was publicly noticed, the applicant accepted reduced SO₂ emission standards for the Nos. 3 and 4 Combination Boilers in the final permit. However, the final permit also allowed the applicant to submit an application within 90 days of issuance to revise the reduced SO₂ emissions standards based on a corrected air quality analysis.

For this project, all model input data remained the same as that used in the supplemental analysis except for the SO₂ emission rates for the Nos. 3 and 4 Combination Boilers. Modeling runs were conducted to determine the maximum allowable SO₂ emission rates that demonstrate compliance with the AAQS and PSD Class II increments. The following tables summarize the revised impacts.

AAQS Impacts

Pollutant	Averaging Time	Modeled Impacts (µg/m ³)	Background Concentrations (µg/m ³)	Total Ambient Impacts (µg/m ³)	AAQS ₃ (µg/m ³)	Total impact greater than AAQS?
SO ₂	Annual	32	5	37	60	No
	24-hour	234	24	258	260	No
	3-hour	720	150	870	1300	No

PSD Class II Increment Analysis

Pollutant	Averaging Time	Maximum Predicted Impact (µg/m ³)	Allowable Increment (µg/m ³)	Impact Greater Than Allowable Increment?
SO ₂	Annual	2	20	No
	24-hour	89	91	No
	3-hour	510	512	No

As shown in the above tables, the predicted impacts meet the respective AAQS and PSD Class II increments for SO₂, based on the following revised SO₂ emissions standards:

1. SO₂ emissions shall not exceed ~~1219~~ 1366 lb/hour when only the No. 3 combination boiler is operating based on a 3-hour rolling CEMS average.
2. The combined SO₂ emissions from No. 3 and No. 4 combination boilers shall not exceed ~~1219~~ 1658 lb/hr when both Nos. 3 and 4 are operating and the SO₂ emissions from No. 4 shall not exceed ~~1183~~ lb/hr based on 3-hour rolling CEMS averages.
3. SO₂ emissions shall not exceed ~~845~~ 907 lb/hour when only the No. 3 combination boiler is operating based on a 24-hour rolling CEMS average.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

4. SO₂ emissions shall not exceed ~~965~~ 690 lb/hour when only the No. 4 combination boiler is operating based on a 24-hour rolling CEMS average. [Rule 62-296.340(BART), F.A.C. and 0050009-027-AC]
5. When both Nos. 3 and 4 combination boilers are operating SO₂ emissions from No. 3 shall not exceed ~~300~~ 329 lb/hr and the SO₂ emissions from No. 4 shall not exceed 643 lb/hr based on 24-hour rolling CEMS averages.

In addition, there were no significant impacts predicted for the PSD Class I areas: Bradwell Bay or St. Marks National Wilderness Areas located 96 and 112 kilometers east of the facility, respectively. Therefore, no PSD Class I increment consumption analyses were required for SO₂ and nitrogen dioxide in these areas. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the Draft Permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the Draft Permit. Bruce Mitchell is the project engineer responsible for reviewing the application and drafting the permit changes. Cleve Holladay is the meteorologist responsible for reviewing and approving the ambient air quality analysis. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

PERMITTEE

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

Authorized Representative:

Mr. B. G. Sammons, General Manager

Permit No. PSD-FL-388A
Project No. 0050009-029-AC
Expires: December 1, 2008
Facility ID No. 0050009
SIC Nos. 2611 and 2621
Nos. 3 and 4 Combination Boilers

FACILITY AND LOCATION

This permit establishes revised sulfur dioxide (SO₂) emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis pursuant to Condition 2 in Subsection 3C of original Permit PSD-FL-388. The existing Panama City mill is classified as a major stationary source, a Title V facility and major source of hazardous air pollutants (HAP). The facility is a Kraft process pulp and paper mill consisting of the following major activities: wood handling facility; pulping, bleaching, and chemical recovery; power house operations; paper machines; finishing, shipping, and warehouse operations; and other associated processes and equipment. The UTM coordinates are Zone 16, 632.8 km East, and 3335.1 km North.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, Florida Administrative Code (F.A.C.). The permittee is authorized to make the proposed changes in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

CONTENTS

Section 1. General Information
Section 2. Revised Permit Conditions

Executed in Tallahassee, Florida

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

(Date)

SECTION 1. GENERAL INFORMATION

Nos. 3 and 4 Combination Boilers

FACILITY AND PROJECT DESCRIPTION

The permittee operates an existing Kraft process pulp and paper mill in Panama City. The existing mill is comprised of major activities areas such as: wood handling facility; pulping, bleaching, and chemical recovery; power house operations; paper machines; finishing, shipping, and warehouse operations; and other associated processes and equipment. This project establishes revised 3-hour and 24-hour SO₂ emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis. This project affects the following existing emissions units.

EU No.	Emissions Unit Description
015	No. 3 Combination Boiler
016	No. 4 Combination Boiler

REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants.
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400 (PSD), F.A.C.

RELEVANT DOCUMENTS

December 19, 2007 Application and revised SO₂ modeling analysis received.

SECTION 2. REVISED PERMIT CONDITIONS

Nos. 3 and 4 Combination Boilers

This permitting action revises the following conditions in Subsection 3C of original Permit PSD-FL-388 (Project No. 0050009-028-AC). All other conditions remain unchanged.

This section of the permit addresses the following emissions units.

EU No.	Description
-015	No. 3 Combination Boiler
-016	No. 4 Combination Boiler

EQUIPMENT

1. Enclosure for Recovery Boiler Building: The permittee is authorized to construct an enclosure for the recovery boiler building to reduce corrosion and maintenance. The enclosure will be implemented in two phases. The first phase will add one wall along the east side of the building. The second phase will add a second wall along the south side of the building and may eventually include enclosing the entire building. [Rule 62-212.400(BACT), F.A.C. and Application No. 0050009-028-AC]


EMISSIONS STANDARDS

2. New SO₂ Standards: The following new SO₂ emissions standards apply to the Nos. 3 and 4 combination boilers in addition to any existing SO₂ emissions standards.
 - a. SO₂ emissions shall not exceed ~~1219~~ 1366 lb/hour when only the No. 3 combination boiler is operating based on a 3-hour rolling CEMS average.
 - b. The combined SO₂ emissions from No. 3 and No. 4 combination boilers shall not exceed ~~1219~~ 1658 lb/hr when both Nos. 3 and 4 are operating and the SO₂ emissions from No. 4 shall not exceed 1183 lb/hr based on 3-hour rolling CEMS averages.
 - c. SO₂ emissions shall not exceed ~~845~~ 907 lb/hour when only the No. 3 combination boiler is operating based on a 24-hour rolling CEMS average.
 - d. SO₂ emissions shall not exceed ~~965~~ 690 lb/hour when only the No. 4 combination boiler is operating based on a 24-hour rolling CEMS average. [Rule 62-296.340(BART), F.A.C. and 0050009-027-AC]
 - e. When both Nos. 3 and 4 combination boilers are operating SO₂ emissions from No. 3 shall not exceed ~~300~~ 329 lb/hr and the SO₂ emissions from No. 4 shall not exceed 643 lb/hr based on 24-hour rolling CEMS averages.

~~Within 90 days of issuance of this permit, the permittee may submit an application to revise the above SO₂ emissions standards based on a revised modeling analysis.~~ {Permitting Note: The new enclosure adversely affects dispersion of the existing stack plumes. The new SO₂ emissions standards are based on the revised air quality analysis provided in support of the PSD application.} [Rules 62-212.400(BACT) and 62-296.340(BART), F.A.C.; and Application Nos. 0050009-027-AC, 0050009-028-AC and 0050009-029-AC]

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Bureau of Air Regulation
THROUGH: Jeff Koerner, New Source Review Section 
FROM: Bruce Mitchell, New Source Review Section
DATE: February 4, 2008
SUBJECT: Draft Permit No. PSD-FL-388A
Project No. 0050009-029-AC
Smurfit-Stone Container Enterprises, Inc.
Panama City Mill, Nos. 3 and 4 Combination Boilers
Revised SO₂ Standards

Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- P.E. Certification.

On December 19, 2007, Smurfit-Stone Container Enterprises, Inc. submitted an application for an air construction permit to revise the sulfur dioxide (SO₂) emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis pursuant to Condition 2 in Subsection 3C of original Permit PSD-FL-388. The Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for issuance. I recommend your approval of the attached Draft Permit.

Attachments

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

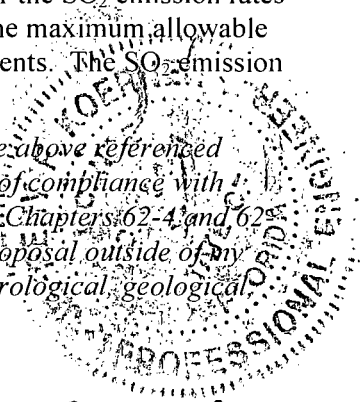
Permit No. PSD-FL-388A
Project No. 0050009-029-AC
Panama City Mill
Nos. 3 and 4 Combination Boilers
Revision of SO₂ Limits

PROJECT DESCRIPTION

On September 26, 2007, the Department issued Permit PSD-FL-388 (Project No. 0050009-028-AC) to authorize construction of a new burner system to fire petcoke in the No. 4 Lime Kiln and a new building enclosure for the recovery boilers. The new enclosure affected plume dispersion (downwash). The draft permit for the original project was issued based on an air quality modeling analysis that did not include several increment consuming sources that should have been present. Prior to issuing the final permit, the applicant provided a supplemental air quality analysis based on the corrected source inventory, but that also corresponded with the PSD Class II increments which were identified in the public notice. To achieve the same level of PSD Class II increment consumption that was publicly noticed, the applicant accepted reduced SO₂ emission standards for the Nos. 3 and 4 Combination Boilers in the final permit. However, the final permit also allowed the applicant to submit an application within 90 days of issuance to revise the reduced SO₂ emissions standards based on a corrected air quality analysis.

On December 19, 2007, the Department received an application pursuant to the permit condition requesting revised SO₂ emissions standards for the Nos. 3 and 4 Combination Boilers. For the revised project, all model input data remained the same as that used in the previous supplemental analysis except for the SO₂ emission rates for the Nos. 3 and 4 Combination Boilers. Modeling runs were conducted to determine the maximum allowable SO₂ emission rates that demonstrate compliance with the AAQS and PSD Class II increments. The SO₂ emission for the Nos. 3 and 4 Combination Boilers were revised accordingly.

***I HEREBY CERTIFY** that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*



Jeffery F. Koerner

2-04-08

Jeffery F. Koerner, P.E.
Registration Number: 49441

(Date)

Harvey, Mary

From: Harvey, Mary
Sent: Monday, February 11, 2008 2:06 PM
To: 'Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc.'; 'Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc.'; 'Mr. David Buff, Golder Associates'; Bradburn, Rick; 'Ms. Kathleen Forney, EPA Region 4'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, National Park Service'
Cc: Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.
Attachments: 0050009.029.AC.D_.pdf.zip

Tracking:	Recipient	Delivery	Read
✓	Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc.'		
✓	Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc.'		
✓	Mr. David Buff, Golder Associates'		
	Bradburn, Rick	Delivered: 2/11/2008 2:06 PM	Read: 2/11/2008 2:10 PM
✓	Ms. Kathleen Forney, EPA Region 4'		
✓	Mr. Jim Little, EPA Region 4'		
✓	Mr. Dee Morse, National Park Service'		
✓	Mitchell, Bruce	Delivered: 2/11/2008 2:06 PM	
✓	Walker, Elizabeth (AIR)	Delivered: 2/11/2008 2:06 PM	
✓	Gibson, Victoria	Delivered: 2/11/2008 2:06 PM	Read: 2/11/2008 2:18 PM

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

DEP, Bureau of Air Regulation

2/11/2008

Harvey, Mary

From: Buff, Dave [DBuff@GOLDER.com]
To: undisclosed-recipients
Sent: Monday, February 11, 2008 2:51 PM
Subject: Read: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.

Your message

To: DBuff@GOLDER.com
Subject:

was read on 2/11/2008 2:51 PM.

Harvey, Mary

From: Clements, Tom [TMCLEMEN@SMURFIT.COM]
Sent: Monday, February 11, 2008 3:17 PM
To: Harvey, Mary
Cc: Sammons, Bob
Subject: RE: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.

Message Recieved,
 Thank you- Tom Clements

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Monday, February 11, 2008 1:06 PM
To: Sammons, Bob; Clements, Tom; Mr. David Buff, Golder Associates; Bradburn, Rick; Ms. Kathleen Forney, EPA Region 4; Mr. Jim Little, EPA Region 4; Mr. Dee Morse, National Park Service
Cc: Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.

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2/11/2008

Harvey, Mary

From: Sammons, Bob [BSAMMONS@SMURFIT.COM]
Sent: Monday, February 11, 2008 2:26 PM
To: Harvey, Mary
Subject: RE: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Monday, February 11, 2008 1:06 PM
To: Sammons, Bob; Clements, Tom; Mr. David Buff, Golder Associates; Bradburn, Rick; Ms. Kathleen Forney, EPA Region 4; Mr. Jim Little, EPA Region 4; Mr. Dee Morse, National Park Service
Cc: Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.

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2/11/2008

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Monday, February 11, 2008 2:18 PM
Subject: Read: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.

Your message

To: 'Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc.'; 'Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc.'; 'Mr. David Buff, Golder Associates'; Bradburn, Rick; 'Ms. Kathleen Forney, EPA Region 4'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, National Park Service'
Cc: Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.
Sent: 2/11/2008 2:06 PM

was read on 2/11/2008 2:18 PM.

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Monday, February 11, 2008 4:55 PM
To: Harvey, Mary
Subject: Re: FW: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.

thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30303

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

02/11/2008 04:22
PM

To
Kathleen Forney/R4/USEPA/US@EPA
cc
Subject
FW: DRAFT PERMIT No.
0050009-029-AC - PSD-FL388-A -
SMURFIT-STONE CONTAINER
ENTERPRISES, INC.

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From: Harvey, Mary
Sent: Monday, February 11, 2008 4:17 PM
To: 'Ms. Kathleen Forney, EPA Region 4'
Subject: FW: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.

From: Harvey, Mary
Sent: Monday, February 11, 2008 2:06 PM

Harvey, Mary

From: Dee_Morse@nps.gov
Sent: Tuesday, February 12, 2008 11:14 AM
To: Harvey, Mary
Subject: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.

Return Receipt

Your document: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.

was received by: Dee Morse/DENVER/NPS

at: 02/12/2008 09:13:47 AM

Harvey, Mary

From: Mitchell, Bruce
Sent: Tuesday, February 12, 2008 9:27 AM
To: Harvey, Mary
Subject: RE: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.

2/12/08

Good morning, Mary. Many thanks for processing the permit package for Smurfit-Stone's Panama City Mill. Have a great day.

Bruce

From: Harvey, Mary
Sent: Monday, February 11, 2008 2:06 PM
To: 'Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc.'; 'Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc.'; 'Mr. David Buff, Golder Associates'; Bradburn, Rick; 'Ms. Kathleen Forney, EPA Region 4'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, National Park Service'
Cc: Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DRAFT PERMIT No. 0050009-029-AC - PSD-FL388-A - SMURFIT-STONE CONTAINER ENTERPRISES, INC.

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Thank you,

DEP, Bureau of Air Regulation

2/13/2008

re: [redacted] [redacted] within a specified time frame.

RECEIVED

DEC 19 2007

BUREAU OF AIR REGULATION

**APPLICATION TO REVISE
SO₂ EMISSION LIMITS FOR NOS. 3 AND 4
COMBINATION BOILERS**

***SMURFIT-STONE CONTAINER ENTERPRISES
PANAMA CITY MILL***

Prepared For:

**Smurfit-Stone Container Enterprises, Inc.
Panama City, Florida**

Prepared By:

**Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500**

December 2007

0637645

**4 Copies – FDEP
2 Copies – SSCE
2 Copy - Golder**

APPLICATION FOR AIR PERMIT – LONG FORM



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revise/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Smurfit-Stone Container Enterprises, Inc.	
2. Site Name: Panama City Mill	
3. Facility Identification Number: 0050009	
4. Facility Location...: Street Address or Other Locator: One Everitt Avenue City: Panama City County: Bay Zip Code: 32402	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Tom Clements, Environmental Superintendent	
2. Application Contact Mailing Address... Organization/Firm: Smurfit-Stone Container Enterprises, Inc. Street Address: One Everitt Avenue City: Panama City State: FL Zip Code: 32402	
3. Application Contact Telephone Numbers... Telephone: (850) 785-4311 ext: 470 Fax: (850) 763-8530	
4. Application Contact Email Address: tmclemen@smurfit.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 12/19/07	3. PSD Number (if applicable): PSD-FL-388A
2. Project Number(s): 0050009-029-nc	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

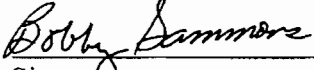
Application Comment

This application is to revise maximum allowable SO₂ emission limits for Nos. 3 and 4 Combination Boilers, based on ambient air quality modeling, as provided for in Permit No. 0050009-028-AC/PSD-FL-388.

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
B. G. Sammons, General Manager
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Smurfit-Stone Container Enterprises, Inc. Street Address: One Everitt Avenue City: Panama City State: FL Zip Code: 32402
3. Owner/Authorized Representative Telephone Numbers... Telephone: (850) 785-4311 ext. Fax: (850) 763-6290
4. Owner/Authorized Representative Email Address: bsammons@smurfit.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i>  Signature _____ Date <u>12/18/07</u>

APPLICATION INFORMATION

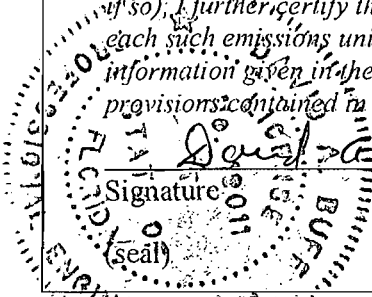
Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:			
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):			
<input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.			
<input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively.			
<input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.			
<input type="checkbox"/> The designated representative at an Acid Rain source.			
3. Application Responsible Official Mailing Address...			
Organization/Firm:			
Street Address:			
City:		State:	Zip Code:
4. Application Responsible Official Telephone Numbers...			
Telephone: () -		ext.	Fax: () -
5. Application Responsible Official Email Address:			
6. Application Responsible Official Certification:			
<i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>			
_____ Signature		_____ Date	

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: David A. Buff Registration Number: 19011
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc.** Street Address: 6241 N.W. 23rd Street, Suite 500 City: Gainesville State: Florida Zip Code: 32653
3. Professional Engineer Telephone Numbers... Telephone: (352) 336-5600 ext. 545 Fax: (352) 336-6603
4. Professional Engineer Email Address: dbuff@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> (1) <i>To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> (2) <i>To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> (3) <i>If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> (4) <i>If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> (5) <i>If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature: <u>David A. Buff</u> Date: <u>12/17/07</u> 

*Attach any exception to certification statement.
**Board of Professional Engineers Certificate of Authorization #00001670

FACILITY INFORMATION

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 16 East (km) 632.8 North (km) 3335.1		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 30 / 08 / 30 Longitude (DD/MM/SS) 85 / 37 / 25	
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 26	6. Facility SIC(s): 2611 2621
7. Facility Comment : This facility is in the Kraft Paper and Bleached Paper Grade subcategories of the pulp and paper industry.			

Facility Contact

1. Facility Contact Name: Tom Clements
2. Facility Contact Mailing Address... Organization/Firm: Smurfit-Stone Container Enterprises, Inc. Street Address: One Everitt Avenue City: Panama City State: FL Zip Code: 32402
3. Facility Contact Telephone Numbers: Telephone: (850) 785-4311 ext. 470 Fax: (850) 763-8530
4. Facility Contact Email Address: tmclemen@smurfit.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

FACILITY INFORMATION

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
<p>7. Facility-Wide or Multi-Unit Emissions Cap Comment:</p>					

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: Feb. 2007
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: Feb. 2007
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: Feb. 2007

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input checked="" type="checkbox"/> Attached, Document ID: Attachment A
3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____
4. List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input checked="" type="checkbox"/> Attached, Document ID: Attachment A <input type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
 Attached, Document ID: _____ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
 Attached, Document ID: _____ Not Applicable (revision application)

2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
 Attached, Document ID: _____
 Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
 Attached, Document ID: _____
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
 Attached, Document ID: _____
 Equipment/Activities On site but Not Required to be Individually Listed
 Not Applicable

5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
 Attached, Document ID: _____ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
 Attached, Document ID: _____ Not Applicable

Additional Requirements Comment

Empty box for additional requirements comment.

EMISSIONS UNIT INFORMATION

Section [3]

No. 3 Combination Boiler

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [3]

No. 3 Combination Boiler

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

No. 3 Combination Boiler

3. Emissions Unit Identification Number: **015**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 26	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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9. Package Unit:
Manufacturer: _____ Model Number: _____

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

The Condensate Stripper System vents stripper off-gases (SOG) to the No. 3 Combination Boiler or the No. 4 Combination Boiler as a TRS/HAP control device.

EMISSIONS UNIT INFORMATION

Section [3]

No. 3 Combination Boiler

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	053		EL
PM ₁₀	053		NS
SO ₂	053		EL
NO _x			NS
CO			NS
VOC			NS
TRS	021		EL
Pb – Lead			NS
HAPs	021		NS
H095 – Formaldehyde			NS
H106 – Hydrochloric Acid			NS
H114 – Mercury			NS

EMISSIONS UNIT INFORMATION

Section [3]
 No. 3 Combination Boiler

POLLUTANT DETAIL INFORMATION

Page [1] of [2]
 Sulfur Dioxide – SO₂

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 1,592.4.0 lb/hour 3,972.7 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 907.0 lb/hr, 24-hr average Reference: Proposed limit based on modeling.		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: 907 lb/hr x 8760 hrs/yr / 2000 lb/ton = 3,972.7 tons/year			
11. Potential Fugitive and Actual Emissions Comment: Maximum hourly emission rate based on application for Permit No. 0050009-016-AC.			

EMISSIONS UNIT INFORMATION

Section [3]
No. 3 Combination Boiler

POLLUTANT DETAIL INFORMATION

Page [2] of [2]
Sulfur Dioxide – SO₂

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 3

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 907.0 lb/hr, 24-hr average	4. Equivalent Allowable Emissions: 907 lb/hour 3,972.7 tons/year
5. Method of Compliance: SO₂ CEMS	
6. Allowable Emissions Comment (Description of Operating Method): Based on a 24-hr average when only the No. 3 combination boiler is operating.	

Allowable Emissions Allowable Emissions 2 of 3

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 329 lb/hr, 24-hr average	4. Equivalent Allowable Emissions: 329 lb/hour tons/year
5. Method of Compliance: SO₂ CEMS	
6. Allowable Emissions Comment (Description of Operating Method): Based on a 24-hr average when Nos. 3 and 4 combination boilers are operating.	

Allowable Emissions Allowable Emissions 3 of 3

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 1,366 lb/hr, 3-hr average	4. Equivalent Allowable Emissions: 1,366 lb/hour tons/year
5. Method of Compliance: SO₂ CEMS	
6. Allowable Emissions Comment (Description of Operating Method): Based on a 3-hr average when only the No. 3 combination boiler is operating.	

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

EMISSIONS UNIT INFORMATION

Section [4]

No. 4 Combination Boiler

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [4]

No. 4 Combination Boiler

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

No. 4 Combination Boiler

3. Emissions Unit Identification Number: **016**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 26	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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9. Package Unit:
Manufacturer: _____ Model Number: _____

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

The Condensate Stripper System vents stripper off-gases (SOG) to the No. 3 Combination Boiler or the No. 4 Combination Boiler as a TRS/HAP control device. The EU ID No. for the Condensate Stripper is also EU 015.

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

Section [4]
No. 4 Combination Boiler

Page [] of [2]
Sulfur Dioxide – SO₂

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 1,183.0 lb/hour 3,022.2 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 690 lb/hr, 24-hour average Reference: Draft permit No. 0050009-027-AC		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: 690 lb/hr x 8760 hrs/yr / 2000 lb/ton = 3,022.2 tons/year			
11. Potential Fugitive and Actual Emissions Comment: Maximum hourly emission rate based on Permit No. 0050009-024-AC.			

EMISSIONS UNIT INFORMATION

Section [4]
No. 4 Combination Boiler

POLLUTANT DETAIL INFORMATION

Page [2] of [2]
Sulfur Dioxide – SO₂

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 690 lb/hr, 24-hr average	4. Equivalent Allowable Emissions: 690 lb/hour 3,022.2 tons/year
5. Method of Compliance: SO₂ CEMS	
6. Allowable Emissions Comment (Description of Operating Method): Based on a 24-hr average for Nos. 3 and 4 Combination Boilers when No. 3 Combination Boiler is operating at 329 lb/hr and No. 4 Combination Boiler is operating at 643 lb/hr.	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 1,183.0 lb/hr, 3-hr average	4. Equivalent Allowable Emissions: 1,183.0 lb/hour tons/year
5. Method of Compliance: SO₂ CEMS	
6. Allowable Emissions Comment (Description of Operating Method): Based on a 3-hr average for No. 4 combination boiler.	

ATTACHMENT A

1.0 INTRODUCTION

Smurfit-Stone Container Enterprises, Inc. (SSCE) operates a kraft pulp and paper mill located in Panama City, Bay County, Florida (Mill). The Mill consists of the following major plant areas: chipyard, digester system, brown stock washing system, bleaching system, chemical recovery area, paper drying/converting/warehousing, and power/utilities area. The Mill is currently operating under Title V Permit No. 0050009-026-AV, issued May 30, 2007.

An air construction permit was issued to SSCE on September 26, 2007 (Permit No. 0050009-028-AC/PSD-FL-388) for the addition of petcoke as a primary fuel in the Lime Kiln, along with the installation of new burners to accommodate the new fuel. This permit included emission limitations on sulfur dioxide (SO₂) emissions from the Nos. 3 and 4 Combination Boilers (EU 015 and EU 016, respectively). These limitations were imposed based on an atmospheric dispersion modeling analysis and meeting ambient air quality standards (AAQS) and prevention of significant deterioration (PSD) allowable Class II increments for SO₂. The limitations are as follows, as taken from the specific conditions in the permit:

1. SO₂ emissions shall not exceed 1,219 pounds per hour (lb/hr) when only the No. 3 Combination Boiler is operating based on a 3-hour rolling CEMS average.
2. The combined SO₂ emissions from No. 3 and No. 4 Combination Boilers shall not exceed 1,219 lb/hr when both Nos. 3 and 4 are operating, and the SO₂ emissions from No. 4 shall not exceed 1,183 lb/hr based on 3-hour rolling CEMS averages.
3. SO₂ emissions shall not exceed 845 lb/hr when only the No. 3 Combination Boiler is operating based on a 24-hour rolling CEMS average.
4. SO₂ emissions shall not exceed 965 lb/hr when only the No. 4 Combination Boiler is operating based on a 24-hour rolling CEMS average.
5. When both Nos. 3 and 4 Combination Boilers are operating SO₂ emissions from No. 3 shall not exceed 300 lb/hr and the SO₂ emissions from No. 4 shall not exceed 643 lb/hr based on 24-hour rolling CEMS averages.

The permit also provides that the permittee may submit an application to revise the above SO₂ emission standards based on a revised modeling analysis.

The purpose of this application is to revise the maximum allowable SO₂ emission limits for Nos. 3 and 4 Combination Boilers based on revised modeling for compliance with AAQS and PSD Class II

increments. The modeling analysis was used to predict the maximum SO₂ emission rates from the Nos. 3 and 4 Combination Boilers which could occur without predicting exceedances of the AAQS or Class II PSD increments.

The modeling analysis was conducted as described in the air construction permit application for the Lime Kiln Petcoke project, and in the Technical Evaluation and Preliminary Determination issued for permit number 0050009-028-AC/PSD-FL-388. All model input data remained the same as used for the permit application, except that the SO₂ emission rates for the Nos. 3 and 4 Combination Boilers were varied to determine the maximum emission rate without exceeding the air quality standards. The following emission scenarios were modeled:

- 3-hour averaging time:
 - No. 3 Combination Boiler operating, with No. 4 Combination Boiler shut down; and
 - No. 4 Combination Boiler emitting at its maximum SO₂ emission rate of 1,183 lb/hr, with No. 3 Combination Boiler limiting its emissions to meet the AAQS/PSD Class II increment.
- 24-hour averaging time:
 - No. 3 Combination Boiler operating with No. 4 Combination Boiler shut down; and
 - No. 4 Combination Boiler emitting at its maximum SO₂ emission rate, which is 690 lb/hr based on the recently issued best available retrofit control technology (BART) limit, with the No. 3 Combination Boiler limiting its emissions to meet the AAQS/PSD Class II increment.

Revised modeling results tables, based on the revised Combination Boiler SO₂ emission rates, are shown in revised Tables 6-16 and 6-18 attached. As shown in the tables, these emission scenarios all meet the respective AAQS and PSD Class II increments for SO₂. Based on these results, the current permit condition wording is proposed to be revised as follows:

1. SO₂ emissions shall not exceed 1,366 lb/hr when only the No. 3 Combination Boiler is operating based on a 3-hour rolling CEMS average.
2. The combined SO₂ emissions from No. 3 and No. 4 Combination Boilers shall not exceed 1,658 lb/hr when both Nos. 3 and 4 are operating and the SO₂ emissions from No. 4 shall not exceed 1,183 lb/hr based on 3-hour rolling CEMS averages.

3. SO₂ emissions shall not exceed 907 lb/hr when only the No. 3 Combination Boiler is operating based on a 24-hour rolling CEMS average.
4. SO₂ emissions shall not exceed 690 lb/hour when only the No. 4 Combination Boiler is operating based on a 24-hour rolling CEMS average.
5. When both Nos. 3 and 4 Combination Boilers are operating, SO₂ emissions from No. 3 shall not exceed 329 lb/hr and the SO₂ emissions from No. 4 shall not exceed 643 lb/hr, based on 24-hour rolling CEMS averages.

TABLE 6-16
MAXIMUM PREDICTED SO₂ IMPACTS FOR COMPARISON TO AAQS (Rev 12/12/07)

Rank and Averaging Time	SO ₂ Concentration (µg/m ³) ^a			Receptor Location ^b		Time Period (YYMMDDHH)	Florida AAQS (µg/m ³)
	Total	Sources	Background	Easting (m)	Northing (m)		
BB3 at 907 lb/hr and BB4 at 0 lb/hr							
Highest Annual	49.9	26.273	23.6	632,470	3,335,610	01123124	60
	55.1	31.511	23.6	632,370	3,335,310	02123124	
	53.1	29.541	23.6	632,570	3,335,710	03123124	
	51.1	27.479	23.6	632,670	3,335,610	04123124	
	52.6	28.972	23.6	630,120	3,338,360	05123124	
HSH 24-Hour	240.3	216.7	23.6	632,570	3,335,810	01112524	260
	235.1	211.5	23.6	632,470	3,335,710	02040824	
	257.5	233.9	23.6	632,470	3,335,810	03063024	
	238.4	214.8	23.6	632,570	3,335,710	04012524	
	251.6	228.0	23.6	632,470	3,335,710	05092524	
BB3 at 329 lb/hr and BB4 at 643 lb/hr							
Highest Annual	50.8	27.2	23.6	632,470	3,335,610	01123124	60
	56.2	32.6	23.6	632,370	3,335,310	02123124	
	53.0	29.4	23.6	632,570	3,335,710	03123124	
	51.4	27.8	23.6	632,470	3,335,610	04123124	
	52.7	29.1	23.6	630,120	3,338,360	05123124	
HSH 24-Hour	228.6	205.0	23.6	632,470	3,335,710	01112924	260
	231.9	208.3	23.6	632,470	3,335,710	02040824	
	245.8	222.2	23.6	632,470	3,335,810	03111624	
	229.4	205.8	23.6	632,470	3,335,610	04110124	
	256.6	233.0	23.6	632,170	3,335,310	05092224	
BB3 at 1366 lb/hr and BB4 at 0 lb/hr							
HSH 3-Hour	751	602	150	632,370	3,335,910	01041206	1,300
	744	594	150	632,570	3,335,610	02092606	
	850	700	150	632,470	3,335,810	03111809	
	710	561	150	633,570	3,335,910	04112324	
	732	583	150	632,470	3,335,810	05122718	
BB3 at 475 lb/hr and BB4 at 1183 lb/hr							
HSH 3-Hour	781	631	150	632,470	3,335,710	01101209	1,300
	727	577	150	632,570	3,335,710	02040912	
	869	720	150	632,470	3,335,810	03111809	
	779	630	150	633,570	3,334,910	04021821	
	788	638	150	632,370	3,335,710	05111506	

Note: YYMMDDHH = Year, Month, Day, Hour Ending
 HSH = Highest, Second-Highest

Note: Maximum 3-hour SO₂ emission rate for No. 3 Combination Boiler is 1,366 lb/hr.
 Maximum 3-hour SO₂ emission rate for No. 4 Combination Boiler is 1,183 lb/hr
 Maximum 24-hour SO₂ emission rate for No. 3 Combination Boiler is 907 lb/hr
 Maximum 24-hour SO₂ emission rate for No. 4 Combination Boiler is 690 lb/hr

^a Concentrations are predicted with AERMOD model and five years of surface meteorological data from the National Weather Service (NWS) station at Apalachicola Regional Airport and upper air soundings from the NWS station at Tallahassee, 2001 to 2005.

^b UTM Coordinates in Zone 16, NAD27 Datum

**TABLE 6-18
MAXIMUM PREDICTED SO₂ IMPACTS FOR
COMPARISON TO PSD CLASS II INCREMENTS (Rev 12/12/07)**

Rank and Averaging Time	Concentration (µg/m ³) ^a	Receptor Location ^b		Time Period (YYMMDDHH)	PSD Class II Increment (µg/m ³)
		Easting (m)	Northing (m)		
<u>BB3 at 907 lb/hr and BB4 at 0 lb/hr</u>					
Highest Annual	2.0	632,891	3,335,283	01123124	20
	2.3	632,891	3,335,283	02123124	
	2.1	632,891	3,335,283	03123124	
	2.0	632,891	3,335,283	04123124	
	2.3	632,891	3,335,283	05123124	
HSH 24-Hour	43.4	632,470	3,335,810	01040224	91
	59.0	632,470	3,335,810	02041524	
	88.9	632,470	3,335,810	03031924	
	58.6	632,470	3,335,810	04110324	
	64.4	632,470	3,335,910	05062724	
<u>BB3 at 329 lb/hr and BB4 at 643 lb/hr</u>					
Highest Annual	2.0	632,891	3,335,283	01123124	20
	2.3	632,891	3,335,283	02123124	
	2.1	632,891	3,335,283	03123124	
	2.0	632,891	3,335,283	04123124	
	2.3	632,891	3,335,283	05123124	
HSH 24-Hour	47.7	632,070	3,335,310	01121324	91
	55.6	632,470	3,335,810	02011324	
	82.3	632,470	3,335,810	03031924	
	51.2	632,670	3,335,810	04110324	
	52.3	632,470	3,335,710	05111624	
<u>BB3 at 1366 lb/hr and BB4 at 0 lb/hr</u>					
HSH 3-Hour	510	632,370	3,335,910	01072621	512
	447	632,470	3,335,810	02011321	
	472	632,370	3,335,910	03111606	
	443	632,470	3,335,810	04042206	
	453	632,470	3,335,710	05092521	
<u>BB3 at 475 lb/hr and BB4 at 1183 lb/hr</u>					
HSH 3-Hour	510	632,370	3,335,910	01041206	512
	426	632,470	3,335,810	02011321	
	489	632,470	3,335,810	03111809	
	438	632,470	3,335,810	04042206	
	459	632,470	3,335,710	05021324	

Note: YYMMDDHH = Year, Month, Day, Hour Ending

HSH = Highest, Second-Highest

Note: Maximum 3-hour SO₂ emission rate for No. 3 Combination Boiler is 1,366 lb/hr.

Maximum 3-hour SO₂ emission rate for No. 4 Combination Boiler is 1,183 lb/hr

Maximum 24-hour SO₂ emission rate for No. 3 Combination Boiler is 907 lb/hr

Maximum 24-hour SO₂ emission rate for No. 4 Combination Boiler is 690 lb/hr

^a Concentrations are predicted with AERMOD model and five years of surface meteorological data from the National Weather Service (NWS) station at Apalachicola Regional Airport and upper air soundings from the NWS station at Tallahassee, 2001 to 2005.

^b UTM Coordinates in Zone 16, NAD27 Datum

Mitchell, Bruce

From: Holladay, Cleve

Sent: Wednesday, January 02, 2008 4:08 PM

To: Koerner, Jeff; Mitchell, Bruce

Subject: Modeling Files for Smurfitt Stone Revision of SO2 limits for Nos. 3 and 4

Jeff, Bruce

I received these files on December 24, 2007.

Cleve

1/7/2008