

## Gibson, Victoria

---

**From:** DeAngelo, Gregory  
**Sent:** Wednesday, January 07, 2004 9:16 AM  
**To:** Gibson, Victoria  
**Cc:** DeAngelo, Gregory  
**Subject:** RE: Addresses for Stone Container

Hi Vickie, there is no RESD anymore. They changed their name in 2003 during a City of Jax reorganization. RESD is now the Environmental Resource Management Department (ERMD).

(And EQD = Environmental Quality Division.)

M. Rundlett = Michelle Rundlett, same address as D.C. Brooks.

R. Robinson =

Richard Robinson  
City of Jacksonville ERMD/EQD  
140 West Monroe Street, Suite 200  
Jacksonville, FL 32202

Could you also send a courtesy copy to the following? Thanks!

Jeffrey A. Walker  
Environmental Manager, Cedar Bay Generating Company  
P.O. Box 26324  
Jacksonville, FL 32226-6324

---

Greg DeAngelo  
New Source Review Section  
850/921-9506 (SunCom 291-9506)  
850/922-6979 (FAX)

-----Original Message-----

**From:** Gibson, Victoria  
**Sent:** Wednesday, January 07, 2004 8:15 AM  
**To:** DeAngelo, Gregory  
**Subject:** Addresses for Stone Container

Hi,

Please provide the address and title for the following persons in regards to the permit of Stone Container:

M. Rundlett, Stone Container Corp.

R. Robinson, City of Jacksonville ERMD/EQD

Also, should we send a copy and/or add James Manning/RESD Jacksonville to this list?

Thank you.

Vickie

Victoria Gibson, Administrative Secretary  
Bureau Chief's Office  
DEP/Bureau of Air Regulation  
victoria.gibson@dep.state.fl.us  
850-921-9504

**Golder Associates Inc.**

6241 NW 23rd Street, Suite 500  
Gainesville, FL 32653-1500  
Telephone (352) 336-5600  
Fax (352) 336-6603



November 4, 2003

RECEIVED 0337560

NOV 06 2003

Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

Attention: Mr. Al Linero

RE: PERMIT NO. 0310067-004-AC/PSD-FL-252, MODIFICATION  
STONE CONTAINER CORPORATION, JACKSONVILLE MILL

Dear Mr. Linero:

On behalf of Stone Container Corporation (SCC), Golder Associates Inc. (Golder) is requesting minor revisions to Permit No. 0310067-004-AC/PSD-FL-252, issued to the Jacksonville Mill on March 9, 2000. SCC is requesting the following revisions:

1. Removal of the individual steam consumption caps for Cedar Bay Cogeneration Project (CBCP) and SCC. The current total steam consumption of 640,000 lb/hr will still apply, however, there is no need to limit the amount of steam imported from CBCP in SCC's permit. CBCP's current Title V permit (Permit No. 0310337-002-AV), current PSD permit (PSD-FL-137), and Site Certification (Certification No. PA 88-24E) do not limit the amount of steam that can be imported by SCC from CBCP.
2. Clarification of the maximum allowable nitrogen oxides (NO<sub>x</sub>) emission rate of 0.2 pounds per million British thermal units (lb/MMBtu) for each package boiler as a 30-day rolling average, per NSPS Subpart Db requirements.
3. Require visible emissions testing to be performed only during each federal fiscal year where the boilers have operated for at least 400 hours, rather than annually with a base date of June 21, 1998. Such testing is required by Rule 62-297.310(7)(a)4., F.A.C. and the PSD permit. The SCC facility will remain permitted to operate 8,760 hours per year, although in the foreseeable future, the facility expects to operate at reduced production rates. The mill is currently shutting down one of its paper machines, and it will remain shutdown indefinitely. As a result, less steam demand will be required to operate the mill, and hence the mill boilers will operate even less in the foreseeable future. Both operating load and operating hours will be curtailed further. This situation, coupled with the fact that the mill boilers are only operated when CBCP cannot supply sufficient steam, will make scheduling a VE test very difficult.

Per Rule 62-297.620, F.A.C, an owner/operator is allowed to request an alternate testing procedure for any requirement of this chapter relating to emissions test procedures, methodology, etc. Therefore, SCC is requesting an alternate VE testing procedure due to the difficulty of scheduling a VE test while the boilers are operating at 90 to 100-percent of maximum operating rate.

4. Allow the NO<sub>x</sub> continuous emission monitoring system (CEMS) relative accuracy test audit (RATA) to be performed every 8,000 hours of boiler operation, rather than once per year. SCC is requesting this allowance since the boilers operate infrequently. During the last three years, the three package boilers each operated an average of 2,142 hours per year (hr/yr) during 2000, 705 hr/yr during 2001, and 1,433 hr/yr during 2002. This equates to boiler uptimes ranging from approximately 8-percent to 25-percent. Since the RATA requirement is based on sources operating continuously throughout the year, SCC is requesting an alternative monitoring requirement for the package boilers. The NSPS, in 40 CFR 60.13(i)(2), allows sources to request alternative monitoring requirements when the affected facility is operated infrequently. Therefore, SCC is requesting a RATA to be performed every 8,000 hours of operation, which would be consistent with the intent of the RATA requirements.

The suggested revised permit language for Permit No. 0310067-004-AC/PSD-FL-252 is presented below.

### **Section III. EMISSION UNIT(S) SPECIFIC CONDITIONS**

4. In accordance with the terms of the Cedar Bay Cogeneration Project (CBCP) site certification, Stone Container Corporation (SCC) is limited to 640,000 lb/hr total steam consumption. ~~(380,000 lb/hr imported from CBCP and 260,000 lb/hr produced by SCC).~~ When CBCP is not in operation or operating at reduced rates, SCC is permitted to produce up to 450,000 lb/hr steam and import up to 190,000 lb/hr from CBCP. This allows a maximum firing rate of 645 MMBtu/hr for all three package boilers when the CBCP facility is shutdown or operating at reduced rates.

5. The maximum allowable NO<sub>x</sub> emissions shall not exceed 0.2 lb/MMBtu (30-day rolling average), 34.94 lb/hr (30-day rolling average) and 153.1 tons/yr per boiler. The total NO<sub>x</sub> emissions from the three package boilers, in accordance with the terms of the CBCP site certification, shall not exceed 310 tons per year.

10. Compliance tests for NO<sub>x</sub> shall be conducted in accordance with 40 CFR 60.46b(e)(4). Compliance with SO<sub>2</sub> limits shall be in accordance with 40 CFR 60.49b(r), and a stoichiometric quantification for SO<sub>2</sub> emissions shall be utilized using the actual density and sulfur weight percent and the quantity of fuel oil fired monthly. Compliance with visible emission limits shall be demonstrated initially and annually during each federal fiscal year where the boilers have operated for at least 400 hours in accordance with EPA Method 9.

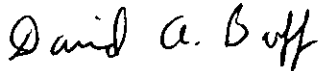
#### **ADDITIONAL PERMIT LANGUAGE:**

A RATA must be performed for each CEMS at least once per 8,000 hours of operation per boiler. The RATA must be performed in accordance with Performance Specification 2 of 40 CFR 60, Appendix B. The results of each RATA must be submitted to the Department's Northeast District and the RESD office within 45 days after completion of the tests (40 CFR 60.13).

If you have any questions regarding this request, please feel free to contact me at (352) 336-5600 or Michele Rundlett, SCC, at (904) 714-3287.

Sincerely,

GOLDER ASSOCIATES INC.



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

<FWB>

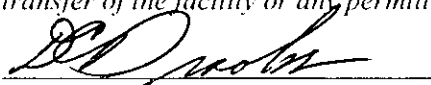
Enclosures

cc: F. Bergen, Golder  
C. Kirts, FDEP Northeast District  
M. Rundlett, SCC

P:\033-7560-fw-b-SCC-Jacksonville-TV Renewal\Permit Revisions\ConstPermitLetter.doc

**Owner/Authorized Representative Statement**

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

1. Owner/Authorized Representative Name : <b>D.C. Brooks, General Manager</b>
2. Owner/Authorized Representative Mailing Address: Organization/Firm: <b>Stone Container Corporation</b> Street Address: <b>PO Box 26998</b> City: <b>Jacksonville</b> State: <b>FL</b> Zip Code: <b>32226-6998</b>
3. Owner/Authorized Representative Telephone Numbers: Telephone: <b>(904) 714-3201</b> ext. Fax: <b>(904) 714-3275</b>
4. Owner/Authorized Representative Email Address: <b>dbrooks@smurfit.com</b>
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  <u>10-30-03</u> Date

**Professional Engineer Certification**

1. Professional Engineer Name: <b>David A. Buff</b> Registration Number: <b>19011</b>
2. Professional Engineer Mailing Address: Organization/Firm: <b>Golder Associates Inc.**</b> Street Address: <b>6241 NW 23<sup>rd</sup> Street, Suite 500</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32653-1500</b>
3. Professional Engineer Telephone Numbers: Telephone: <b>(352) 336-5600</b> ext. Fax: <b>(352) 336-6603</b>
4. Professional Engineer Email Address: <b>Dave_Buff@golder.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) 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> <i>(2) 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> <i>(3) 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> <i>(4) 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> <i>(5) 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>  <i>David A. Buff</i> _____ Signature  (seal)  <i>11/5/03</i> _____ Date

\* Attach any exception to certification statement.

\*\*Board of Professional Engineers Certificate of Authorization #00001670.

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

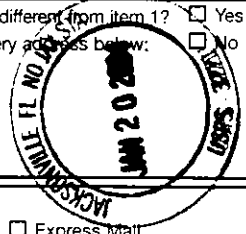
Mr. D. C. Brooks  
 General Manager  
 Stone Container Corporation  
 Post Office Box 26998  
 Jacksonville, FL 32226-6998

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) *Mike McFalls* B. Date of Delivery

C. Signature *[Signature]*  Agent  Addressee

D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below:



3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

2  
P

102595-99-M-1789

**U.S. Postal Service  
 CERTIFIED MAIL RECEIPT  
 (Domestic Mail Only; No Insurance Coverage Provided)**

7000 2870 0000 7028 3796

[Redacted area]

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	<b>\$</b>	

Sent To  
 D. C. Brooks  
 Street, Apt. No., or PO Box No.  
 Po Box 26998  
 City, State, ZIP+4  
 Jacksonville, FL 32226-6998  
 See Reverse for Instructions

PS Form 3800, May 2000