

File copy

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

March 22, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. T. P. Crane
Champion International Corporation
Post Office Box 87
Cantonment, Florida 32533-0087

Dear Mr. Crane:

Re: Extension of Expiration Date, Gas-Fired Package Boiler,
AC 17-140962, PSD-FL-126

The Department has received and reviewed Champion's February 23, 1989, request for an extension of the expiration date of the above referenced permit. The Department grants the extension of time so that you may continue to operate the boiler while the application for an operation permit is being processed.

The following shall be changed and added to the permit:

Expiration Date Change:

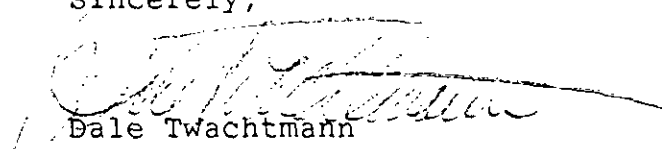
From: March 2, 1989
To: May 1, 1989

Attachments to be Added:

9. Champion's extension request, dated February 23, 1989, and received February 27, 1989.

This letter shall be attached to the construction permit, AC 17-140962, and shall become a part of the permit.

Sincerely,


Dale Twachtmann
Secretary

DT/mdh

cc: E. Middleswart, NW District
W. Aronson, EPA
H. Dail, CIC
D. Arceneaux, Champion

Mike Harley }
Reading File } 3-30-89 RM
Pam Hounwe

P 274 010 413

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

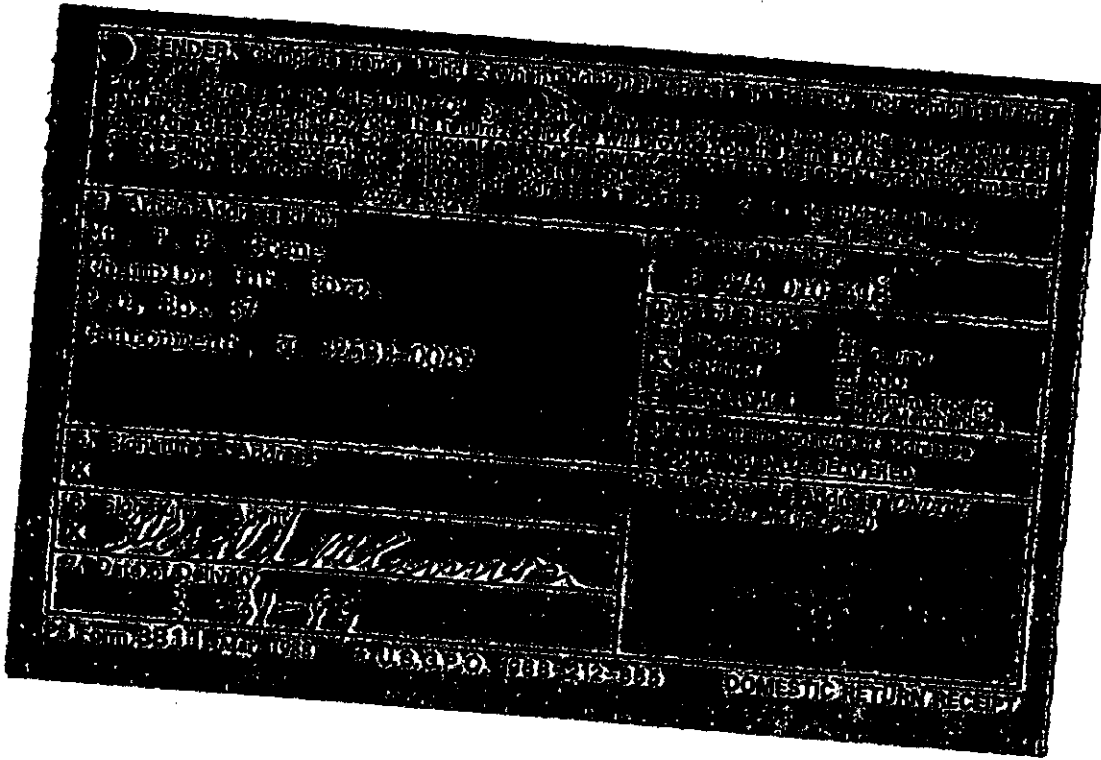
* U.S.G.P.O. 1985-600-704

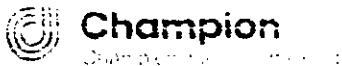
PS Form 3800, June 1985

To: T. P. Crane
~~Champion International Corp.~~
Street and No.
P.O. Box 87
Parclement, FL 32533-0087

| | |
|---|----|
| Postage | \$ |
| Certified Fee | |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt showing to whom and Date Delivered | |
| Return Receipt showing to whom, Date, and Address of Delivery | |
| TOTAL Postage and Fees | \$ |

Postmark or Date
mailed: 3/30/89
Permits: AC 17-140962
PSD-FL-126





RECEIVED
FEB 27 1989
DER-BAQM

February 23, 1989

Mr. William Thomas
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

RE: Gas Fired Package Boiler
Permit No. AC17-14962; PSD-FL-126

Dear Mr. Thomas:

The operating permit application package for the Gas Fired Package Boiler was submitted to your Northwest District Office on Wednesday, February 23, 1989.

The construction permit will expire on March 2, 1989. I am requesting a 60 day extension of this permit to allow adequate time for agency review of the submitted information and to issue the necessary permit.

If you or your staff have any questions, please call.

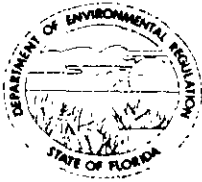
Sincerely,

David T. Arceneaux
Supervisor
Environmental Control

DTA/sc

cc: Ed Middleswart - FDER

*copied: Mr. Middle
12/1/89*



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

| For Routing To Other Than The Addressee | |
|---|-----------------|
| To _____ | Location: _____ |
| To _____ | Location: _____ |
| To _____ | Location: _____ |
| From: _____ | Date: _____ |

Interoffice Memorandum

RECEIVED
MAR 24 1989

TO: Dale Twachtmann

FROM: Steve Smallwood *signature*

Office of the Secretary

SUBJ: Approval of a Construction Permit Amendment for Champion International Corporation

| | | |
|------------|--------------|---------|
| State | Construction | Permit |
| Number: AC | 17-140962 | |
| Federal | Permit | Number: |
| PSD-FL-126 | | |

DATE: March 22, 1989

Attached for your approval and signature is a letter prepared by Central Air Permitting that will amend the construction permit for a gas-fired package boiler by extending the expiration date. The extension will allow the applicant to continue to operate the boiler while the Department processes the application for an operation permit.

The facility is located in Cantonment, Escambia County, Florida. The amendment is not controversial.

I recommend your approval and signature.

SS/mdh

attachments

DT-A

Printing and Writing Papers
375 Muscogee Road
P.O. Box 87
Cantonment, Florida 32533-0087
904 968-2121

P11
2-21-89
Cantonment, FL

field copy



February 23, 1989

RECEIVED
FEB 27 1989
DER-BAQM

Mr. William Thomas
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

RE: Gas Fired Package Boiler
Permit No. AC17-14962, PSD-FL-126

Dear Mr. Thomas:

The operating permit application package for the Gas Fired Package Boiler was submitted to your Northwest District Office on Wednesday, February 23, 1989.

The construction permit will expire on March 2, 1989. I am requesting a 60 day extension of this permit to allow adequate time for agency review of the submitted information and to issue the necessary permit.

If you or your staff have any questions, please call.

Sincerely,

A handwritten signature in cursive script that reads "David T. Arceneaux".

David T. Arceneaux
Supervisor
Environmental Control

DTA/sc

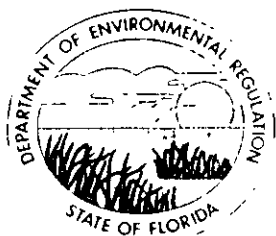
cc: Ed Middleswart - FDER

*copied: M. Harley
CHF/ST*

375 Muscogee Road
P.O. Box 87
Cantonment, Florida 32533-0087



Mr. William Thomas
State of Florida
Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

January 20, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. T. P. Crane
Champion International Corporation
Post Office Box 87
Cantonment, Florida 32533-0087

Dear Mr. Crane:

Re: Extension of Expiration Date, Gas-Fired Package Boiler, AC
17-140962, PSD-FL-126

The Department has received and reviewed Champion's December 28, 1988, request for an extension of the expiration date of the above referenced permit. The Department grants the extension of time for submission of the final compliance test report and the application for an operation permit.

The following shall be changed and added to the permit:

Expiration Date Change:

From: January 1, 1989

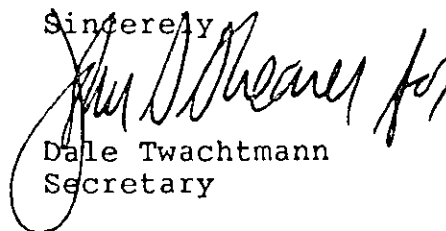
To: March 2, 1989

Attachments to be Added:

8. Champion's extension request, dated December 28, 1988, and received December 29, 1988.

This letter shall be attached to the construction permit, AC 17-140962, and shall become a part of the permit.

Sincerely,



Dale Twachtmann
Secretary

DT/mdh

cc: E. Middleswart, NW District
W. Aronson, EPA
H. Dail, CIC
D. Arceneaux, Champion

P 274 007 567

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

U.S.G.P.O. 1985-480-794
PS Form 3800, June 1985

| | |
|--|----|
| Sent to Mr. T. P. Crane, Champion | |
| Street and No. Int. Corp. | |
| P. O. Box 87 | |
| P. O., State and ZIP Code Cantonment, FL 32533-0087 | |
| Postage | \$ |
| Certified Fee | |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt showing to whom and Date Delivered | |
| Return Receipt showing to whom Date, and Address of Delivery | |
| TOTAL Postage and Fees | \$ |
| Postmark or Date Mailed: 1-30-89 Permit: AC 17-140962 PSD-FL-126 | |

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge)
2. Restricted Delivery (Extra charge)

| | |
|--|---|
| 3. Article Addressed to: Mr. T. P. Crane Champion International Corp. P. O. Box 87 Cantonment, FL 32533-0087 | 4. Article Number P 274 007 567 |
| 5. Signature - Address X | Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise |
| 6. Signature - Agent X Betsey Adams | Always obtain signature of addressee or agent and DATE DELIVERED. |
| 7. Date of Delivery 1/31/89 | 8. Addressee's Address (ONLY if requested and fee paid) |

Printing and Writing Papers
375 Minscogee Road
P. O. Box 87
Gainesville, Florida 32639-0087
904 958-2121

12-28-88
CUSTOMER SERVICE

00000000000000000000

RECEIVED

DEC 29 1988

DER-BAQM



December 28, 1988

Mr. William Thomas
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

RE: Gas Fired Packaged Boiler
Permit No. AC 17-140962
PSD-FL-126

Dear Mr. Thomas:

The package boiler was tested for compliance on September 27, 1988. Verbal results from the consultant, Weston-ATC, Inc., indicate compliance with all permit conditions. The final report and operating permit application will not be ready for submittal until early January.

Since the construction permit expires on January 1, 1989, Champion requests an extension of 60 days in order to submit the operating permit application.

If you or your staff have any question, please call.

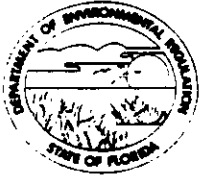
Sincerely,

David T. Arceneaux
Supervisor
Environmental Control

DTA/cr

cc: Ed Middleswart--FDER ✓

Mike M... }
CUP/ET } 12-28-88



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

| For Routing To Other Than The Addressee | |
|---|-----------------|
| To: _____ | Location: _____ |
| To: _____ | Location: _____ |
| To: _____ | Location: _____ |
| From: _____ | Date: _____ |

Interoffice Memorandum

TO: Dale Twachtmann

tw FROM: Steve Smallwood *Smallwood*

SUBJ: Approval of a Construction Permit Amendment for Champion International Corporation
State Construction Permit Number: AC 17-140962
Federal Permit Number: PSD-FL-126

DATE: January 20, 1989

Attached for your approval and signature is a letter prepared by Central Air Permitting that will amend the construction permit for a gas-fired package boiler by extending the expiration date. The extension is needed for the applicant to submit an application for an operation permit and the results of the compliance test.

The facility is located in Cantonment, Escambia County, Florida. The amendment is not controversial.

I recommend your approval and signature.

SS/mdh

attachments

RECEIVED

JAN 23 1989

Office of the Secretary

Printing and Writing Papers
375 Muscogee Road
P.O. Box 87
Cantonment, Florida 32533-0087
904 968-2121

PM
12-28-88
CONTAINER 3, 7, 4

A. MERTZ
12-28-88

12-28-88

RECEIVED

DEC 29 1988

DER-BAQM



December 28, 1988

Mr. William Thomas
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

RE: Gas Fired Packaged Boiler
Permit No. AC 17-140962
PSD-FL-126

Dear Mr. Thomas:

The package boiler was tested for compliance on September 27, 1988. Verbal results from the consultant, Weston-ATC, Inc., indicate compliance with all permit conditions. The final report and operating permit application will not be ready for submittal until early January.

Since the construction permit expires on January 1, 1989, Champion requests an extension of 60 days in order to submit the operating permit application.

If you or your staff have any question, please call.

Sincerely,

A handwritten signature in cursive script, appearing to read 'David T. Arceneaux'.

David T. Arceneaux
Supervisor
Environmental Control

DTA/cr

cc: Ed Middleswart--FDER

Middle Middleswart
Middleswart

FORM OF PAYMENT *

CASH GBL CBL

PPD COL OTH COMAT

Shippers Emery Account Number
E 44361577

EMERY
WORLDWIDE

2142886603



UNITED STATES / CANADA

STANDARD SERVICES *

Same Day Other
Next Morning Metro
Second Morning

INTERNATIONAL

STANDARD SERVICES *

Courier Express Business Documents
Air Cargo Service Customs Clearance
Air Economy Service Delivery

RECEIVED
 DEC 29 1988
 DER-BAQM

Date: 12/28/88
Origin: PMS
Shipment Number: 214288660

From: David Arceneaux
 CHAMPION INTERNATIONAL
 KIDWORTHY RD
 ANTONMENT FL
 Customer's Reference Numbers: 32533

To: Mr. William Thomas
 State of FL Dept. of Environmental Reg.
 Twin Towers Office Building
 2600 Glair Stone Road
 Tallahassee, FL 32301-8241
 Consignee's Emery Account No. E

Tariff Dest. Gateway
 Saturday Delivery
 Check to Shipper \$
 Hold at Airport
 Emery will collect consignee's check made payable only to the shipper for the value of the goods in the amount shown above.

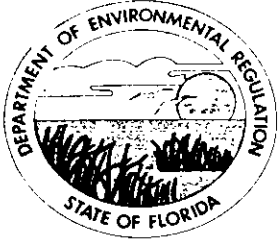
| | | | | | | | | | | | | | |
|---|---|---|-------------------------------------|--------------|------------------------|---|---|---|---|---|---|---|---|
| Description and Marks | Dimensions | | | Total Pieces | Total Weight (In LBS.) | | | | | | | | |
| LETTER | Pcs. | L | W | H | | | | | | | | | |
| | 1 | | | | 1 | | | | | | | | |
| TODSR <input type="checkbox"/> Haz Mat <input type="checkbox"/> Edit <input type="checkbox"/> | A | B | C | D | E | F | G | 1 | 2 | 3 | 4 | 5 | 6 |
| | | | | | | | H | 7 | 8 | 9 | 0 | 1 | 2 |
| | | | | | | | I | | | | | | |
| | | | | | | | J | | | | | | |
| | | | | | | | K | | | | | | |
| Shipper's Signature X | Envelope 9X12 <input checked="" type="checkbox"/> | | Pack 12X15 <input type="checkbox"/> | | | | | | | | | | |

324 N

Terms and Conditions on Back

| | | |
|--|---|-------------------------------|
| International Charges | Third party Emery Account Number mandatory for Third party billing. E | Third Party Emery Account No. |
| Free Domicile <input type="checkbox"/> | Comm. Code | |
| At Origin | Intl. Customs Value | Intl. Insurance |
| Base Charge | | |
| At Destination | Total Transportation Charges | Other Charges OC \$ |
| TOTAL | | |

| | | |
|----------------------------|---|---------------------------|
| Rec'd By Emery | Time Received | Date Received |
| Goods Rec'd At: | Shippers Door <input type="checkbox"/> Drop Box <input type="checkbox"/> Emery Terminal <input type="checkbox"/> Carrier Advance <input type="checkbox"/> | By: Emery Representative. |
| Multiple Shpts. / Drop Box | | |
| 1 2 3 4 5 6 | | |
| 7 8 9 0 1 2 | | |
| Over 32 → | | |



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

September 14, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. T. P. Crane
Champion International Corporation
Post Office Box 87
Cantonment, Florida 32533-0087

Dear Mr. Crane:

Re: Extension of Expiration Date, Gas-Fired Package Boiler,
AC 17-140962, PSD-FL-126

The Department has received and reviewed Champion's request dated September 2, 1988, for an extension of the expiration date of the above referenced permit.

The Department is in agreement with your request. The following shall be changed and added to the permit:

Expiration Date Change:

From: October 1, 1988
To: January 1, 1989

Attachments to be Added:

5. Champion's extension request, dated April 13, 1988.
6. DER's letter granting an extension, dated April 25, 1988.
7. Champion's second extension request, dated September 2, 1988.

This letter must be attached to your construction permit, AC 17-140962/PSD-FL-126, and shall become a part of the permit.

Sincerely,

Dale Twachtmann
Secretary

DT/ks

cc: E. Middleswart, NW District
W. Aronson, EPA
H. Dail, CIC

P. 274 007 455

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

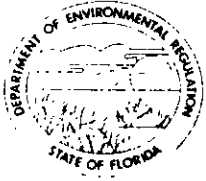
| | |
|---|----|
| Sent to Mr. T. P. Crane, Champion Int. | |
| Street and No P. O. Box 87 | |
| P.O., State and ZIP Code Cantonment, FL 32533-0087 | |
| Postage | \$ |
| Certified Fee | |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt showing to whom and Date Delivered: | |
| Return Receipt showing to whom, Date, and Address of Delivery: | |
| TOTAL Postage and Fees | \$ |
| Postmark or Date Permit: AC 17-140962 PSD-FL-126 Mailed: 9-21-88 | |

● **SENDER:** Complete items 1 and 2 when additional services are desired and complete items 3 and 4. Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees, the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and address of addressee. Restricted Delivery (Extra charge)†

2. **REG NOT** (Extra charge)†


| | |
|---|---|
| 3. Article Addressed to: Mr. T. P. Crane Champion International Corp Post Office Box 87 Cantonment, FL 32533-0087 | 4. Article Number P 274 1007 455 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input checked="" type="checkbox"/> Express Mail |
| 5. Signature - Addressee X | Always obtain signature of addressee or agent and DATE DELIVERED . |
| 6. Signature - Agent X <i>Betsy Adams</i> | 8. Addressee's Address (ONLY if requested and fee paid) |
| 7. Date of Delivery <i>9-22-88</i> | |



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

| For Routing To Other Than The Addressee | |
|---|-----------------|
| To _____ | Location: _____ |
| To _____ | Location: _____ |
| To _____ | Location: _____ |
| From: _____ | Date: _____ |

Interoffice Memorandum

TO: Dale Twachtmann
FROM: Steve Smallwood 
SUBJ: Extension of Expiration Date
Champion International Corporation
Permit No. AC 17-140962, PSD-FL-126
DATE: September 14, 1988

Attached for your approval and signature is a letter prepared by Central Air Permitting to extend the expiration date of the construction permit issued to the above mentioned company for a gas-fired package boiler. The facility is located in Escambia County, Florida.

I recommend your approval and signature.

SS/PR/s

attachments



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

| For Routing To Other Than The Addressee | |
|---|----------------|
| To _____ | Location _____ |
| To _____ | Location _____ |
| To _____ | Location _____ |
| From _____ | Case _____ |

Interoffice Memorandum

TO: Dale Twachtmann
FROM: Steve Smallwood
SUBJ: Extension of Expiration Date
Champion International Corporation
Permit No. AC 17-140962, PSD-FL-126
DATE: September 14, 1988

Attached for your approval and signature is a letter prepared by Central Air Permitting to extend the expiration date of the construction permit issued to the above mentioned company for a gas-fired package boiler. The facility is located in Escambia County, Florida.

I recommend your approval and signature.

SS/PR/s

A handwritten signature in cursive script, appearing to read "SS/PR/s", is written over the typed name.

attachments.

Printing and Writing Papers
375 Muscogee Road
P.O. Box 87
Cantonment, Florida 32533-0087
904 968-2121

PM
9-2-88
Cantonment, FL

John Lopez



RECEIVED
SEP 6 1988
DER-BAQM

September 2, 1988

Mr. William Thomas
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

RE: Gas Fired Package Boiler
Permit No. AC 17-140962
PSD-FL-126

Dear Mr. Thomas:

Operating problems with the package boiler require the Pensacola Champion mill to request an extension of its construction permit.

The package boiler was prepared for testing on July 18th but this effort was aborted when a power failure damaged both mill turbine generators. The test was rescheduled. On September 2, 1988, the day of the rescheduled compliance test, the package boiler ruptured a superheater tube and the tests were again cancelled.

We intend to reschedule the test as soon as possible following repairs.

In order to complete the testing requirements and submit an operating permit application Champion is requesting a 60 day extension of the current construction permit.

As I indicated to you by telephone this day, I have also contacted Mr. Jack Preece with your Northwest District Office.

375 Muscogee Road
P.O. Box 87
Cantonment, Florida 32533-0087



Mr. William Thomas
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241
|||

Mr. William Thomas
Page 2
September 2, 1988

If you or your staff have any questions please call.

Sincerely,

Harry A. Dail
Harry A. Dail
Process Engineer
Environmental Control

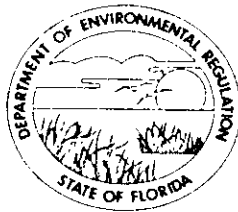
HAD/hs

cc: Mr. Ed Middleswart
State of Florida
Department of Environmental Regulation
160 Governmental Center
Pensacola, Florida 32501-5794

copied: Pradeep Rawil
CHF/RT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

April 25, 1988

Mr. T. P. Crane, Operations Manager
Champion International Corporation
Post Office Box 87
Cantonment, Florida 32533

Dear Mr. Crane:

Re: Amendment of Permit No. AC 17-140962 (PSD-FL-126)

The Department is in receipt of Mr. David T. Arceneaux's April 13, 1988, letter requesting the permit to construct a gas-fired package boiler at your plant be extended to allow additional time to complete testing and to submit an application for permit to operate. This request is acceptable, with conditions, and the expiration date of permit No. AC 17-140962 is extended from June 1, 1988, to October 1, 1988.

To clarify the testing requirements for this source, Specific Condition No. 4 of the reference permit is amended as follows:

From:

4. Initial and annual compliance tests shall be conducted as follows:

- a) EPA Method 7 for NO_x
- b) EPA Method 10 for CO
- c) DER Method 9 for VE

Other DER approved methods may be used in place of the above tests, only after prior approval from the Department.

To:

4. Initial and annual compliance tests shall be conducted as follows:

- a) EPA Method 7 to show compliance with the emission standard of 0.2 lb/MMBtu for NO_x.
- b) EPA Method 10 to show compliance with the emission standard of 0.24 lb/MMBtu for CO.

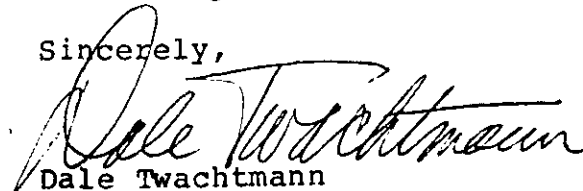
Mr. T. P. Crane
Page Two
April 25, 1988

c) DER Method 9 to show compliance with the emission standard of 5% opacity.

Prior to the compliance tests for NOx and CO, the permittee shall traverse the duct above the economizer with a continuous oxygen meter and record the oxygen concentrations and distances from the stack wall at a minimum of 12 equally spaced points. The NOx sample shall be collected at the location in the stack having the average O₂ concentration. A composite sample of the flue gas shall be collected at a rate proportional to the stack velocity at the 12 sample points for CO and O₂ analysis. Test results are to be calculated using the "F" factor for natural gas fuel. Visible emissions readings are to be taken at the stack outlet concurrently with the CO tests. If, for good reason this is not done, the tests shall be conducted as close to each other as feasible. All field collected data will be included with the tests report.

A copy of this letter must be attached to the referenced construction permit and shall become a part of that permit.

Sincerely,



Dale Twachtmann
Secretary

DT/ks

attachment

cc: E. Middleswart, NW District
D. Arceneaux, Champion Int. Corp.

ATTACHMENT

375 Muscogee Road
P.O. Box 37
Guntersville, Florida 32533-0037
904 933-2121



April 13, 1988

Mr. William Thomas
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

RE: Gas Fired Package Boiler
Permit No. AC 17-140962
PSD-FL-126

Dear Mr. Thomas:

The package boiler was installed and began operation on February 12, 1988. We had planned the compliance test for late February, but have been unable to test due to the stack arrangement. Because of the installation of an economizer, the boiler duct turns into the stack six feet below the stack exit. The installed stack port is less than three feet below the stack exit. Due to this arrangement there is no way we can measure flow nor get a good gas concentration.

Champion proposes to measure the flue gas just above the economizer in a rectangular section of the duct just below the turning vanes. The attached drawing shows the location of this test port. Because of the location of the steam drum and economizer, the flue gases across the width of the duct should be uniform. The gases along the length may not be uniform. However, by measuring at four equal distance points along the length, and averaging results, a good measure of flue gas concentration can be accomplished. In order to measure flow, a complete traverse using a continuous oxygen meter along with F factor from fuel usage should provide accurate flow measurement.

Because of the testing difficulties, and the delay in start-up of the boiler, Champion requests an extension of the Construction Permit AC 17-140962 to October 1, 1988. This will provide sufficient time to complete testing and submit an operating permit application.

RECEIVED

APR 15 1988

DER-BAQM

Mr. William Thomas
State of Florida
Department of Environmental Regulation
Page 2
April 13, 1988

If you or your staff have any questions, please call.

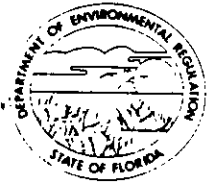
Sincerely,



David T. Arceneaux
Supervisor
Environmental Control

DTA/hs

cc: Mr. Ed Middleswart
State of Florida,
Department of Environmental Regulation
160 Governmental Center
Pensacola, Florida 32501-5794



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

| For Routing To Other Than The Addressee | |
|---|-----------------|
| To: <u>claw</u> | Location _____ |
| To: _____ | Location: _____ |
| To: _____ | Location: _____ |
| From: _____ | Date _____ |

Interoffice Memorandum

TO: Dale Twachtmann

FROM: Howard L. Rhodes *HLR*

SUBJ: Approval of a Construction Permit Amendment for Champion International Corporation
 State Construction Permit Number: AC 17-140962
 Federal Permit Number: PSD-FL-126

DATE: April 25, 1988

Attached for your approval and signature is a letter prepared by Central Air Permitting that will extend and amend the construction permit for a gas-fired package boiler. The extension is needed to conduct the compliance tests, which are clarified in this amendment, and submit the application for permit to operate.

The facility is located in Cantonment, Escambia County, Florida. The amendment is not controversial.

I recommend your approval and signature.

HLR/aqm/wh
 attachments

RECEIVED

APR 26 1988

Office of the Secretary

RECEIVED

APR 27 1988

DER-BAQM

P 274 010 489

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

* U.S.G.P.O. 1985-480-794
PS Form 3800, June 1985

| | |
|---|--|
| Mr. T.P. Crane, Ops. Mgr. Champion International Corp. <small>Street and No.</small> P.O. Box 87 | |
| P.O., State and ZIP Code Cantonment, FL 32533 | |
| Postage | |
| Certified Fee | |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt showing to whom and Date Delivered | |
| Return Receipt showing to whom, Date, and Address of Delivery | |
| TOTAL Postage and Fees | |
| Postmark or Date Mailed: 04/28/88 Permit: AC 17-140962 Federal: PSD-FL-126 | |

● **SENDER:** Complete Items 1 and 2 when additional services are desired, and complete Items 3 and 4. Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

| | |
|--|--|
| 1. <input checked="" type="checkbox"/> Show to whom delivered, date, and addressee's address. ↑(Extra charge)↑ | 2. <input type="checkbox"/> Restricted Delivery ↑(Extra charge)↑ |
| 3. Article Addressed to: Mr. T.P. Crane, Ops. Mgr. Champion International Corp. P.O. Box 87 Cantonment, FL 32533 | 4. Article Number: P 274 010 489 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail |
| 5. Signature — Addressee X | Always obtain signature of addressee or agent and DATE DELIVERED. 8. Addressee's Address (ONLY if requested and fee paid) |
| 6. Signature — Agent X <i>Betsy Adams</i> | |
| 7. Date of Delivery 4-29-88 | |

375 Muscogee Road
P.O. Box 87
Cantonment, Florida 32533-0087
904 968-2121



April 13, 1988

Mr. William Thomas
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

RE: Gas Fired Package Boiler
Permit No. AC 17-140962
PSD-FL-126

Dear Mr. Thomas:

The package boiler was installed and began operation on February 12, 1988. We had planned the compliance test for late February, but have been unable to test due to the stack arrangement. Because of the installation of an economizer, the boiler duct turns into the stack six feet below the stack exit. The installed stack port is less than three feet below the stack exit. Due to this arrangement there is no way we can measure flow nor get a good gas concentration.

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Because of the testing difficulties, and the delay in start-up of the boiler, Champion requests an extension of the Construction Permit AC 17-140962 to October 1, 1988. This will provide sufficient time to complete testing and submit an operating permit application.

RECEIVED

APR 15 1988

DER-BAQM

FORM OF PAYMENT

EMERY
WORLDWIDE

UNITED STATES / CANADA

INTERNATIONAL

CASH GBL CBL FCCOD

STANDARD SERVICES *

STANDARD SERVICES *

PPD COL OTH COMAT

Same Day Other

Next Morning Metro

Counter Express

Business Documents

Second Morning

Air Cargo Service

Air Economy Service

Customs Clearance

Delivery

0458007264



Shippers Emery Account Number
E 976260597

Date: 4/14/88
Origin: FNS
Shipment Number: 045800726

From: 904/968-4253
David Arceneaux

To:

Mr. William Thomas
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
3600 Blair Stone Road
Tallahassee, Florida 32301-8241

RECEIVED

APR 15 1988
Emery will collect consignee's check payable only to the shipper for the value of the goods in the amount shown above.

CHAMPION INTERNATIONAL
DEPT. 2035 TECHNICAL
MUSCOGEE RD
DANTONMENT FL
Customer's Reference Numbers: 32500
Zip: 32301

| Description and Marks | Pcs. | Dimensions | | | Total Pieces | Total Weight (In Lbs.) |
|-----------------------|------|------------|---|---|--------------|------------------------|
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| Urgent Letter | | | | | 1 | |

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32301 N
Terms and Conditions on Back

| | | | |
|--|------------------------------|--|-------------------------------|
| Shipper's Signature X | International Charges | Third party Emery Account Number mandatory for Third party billing | Third Party Emery Account No. |
| Free Domicile <input type="checkbox"/> | Comm. Code | E | |
| At Origin | Intl. Customs Value | Intl. Insurance | Rec'd By Emery |
| Base Charge | Total Transportation Charges | Other Charges | Time Received |
| At Destination | | | Date Received |
| TOTAL | | | Multiple Shpts. / Drop Box |

| | | | |
|-----------------|---|--|--------------------------|
| Goods Rec'd At: | Shippers Door <input type="checkbox"/> | Drop Box <input type="checkbox"/> | A |
| | Emery Terminal <input type="checkbox"/> | Carrier Advance <input type="checkbox"/> | B |
| | | | By: Emery Representative |

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|-----------|---|---|---|---|---|
| 1 | 2 | 3 | 4 | 5 | 6 |
| 7 | 8 | 9 | 0 | 1 | 2 |
| Over 32 → | | | | | |

Mr. William Thomas
State of Florida
Department of Environmental Regulation
Page 2
April 13, 1988

If you or your staff have any questions, please call.

Sincerely,



David T. Arceneaux
Supervisor
Environmental Control

DTA/hs

cc: Mr. Ed Middleswart
State of Florida
Department of Environmental Regulation
160 Governmental Center
Pensacola, Florida 32501-5794



JAN 15 1988

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

PM
19 January 1988
Atlanta, GA

file copy

4APT/APB-am

DER

JAN 22

BAQM

Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Champion International Corporation (PSD-FL-126)
AC 17-140962

Dear Mr. Fancy:

This is to acknowledge the receipt of your December 21, 1987, final determination and permit on the installation of a skid mounted temporary gas fired boiler at the above-referenced source.

We have reviewed your submittal and concur with your decision. However, I would like to add that the "top-down" BACT policy has been implemented by EPA as of December 1, 1987, with the issuance of the memorandum entitled, "Improving New Source Review (NSR) Implementation" (copy enclosed). Efforts are now being made on our part to inform all of the State/local agencies with regard to the full meaning of this document. Meanwhile, please inform all future applicable sources to perform BACT determinations in a "top-down" fashion and to take into consideration all unregulated toxic air pollutants along with regulated air pollutants when making applicable BACT determinations.

Thank you for the opportunity to provide our comments. If you have any questions, please contact me or Gary Ng of my staff at (404) 347-2864.

Sincerely yours,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

Enclosure

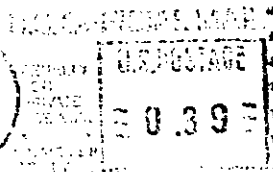
Copied

*Pradeep Paval
Tom Rogers
CHF IBT*

10-25-88 (img)

*Barry Andrews
Willard Hanks
Bruce Mitchell
Mike Hawley
John Reynolds
Teresa Nelson*

*copied due to
the attached
memo*



United States
Environmental Protection
Agency
Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

Official Business
Penalty for Private Use
\$300

Mr. C.H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
State of Florida
~~Department of Environmental Regulation~~
~~Twin Towers Office Building~~
~~2600 Blair Stone Road~~
Tallahassee, Florida 32399-2400

DEER
JAN 22
3:40 PM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Miller

DEC 1 1987

DEC 7 1987
OFFICE OF AIR AND RADIATION
EPA-REGION IV
ATLANTA, GA.

MEMORANDUM

SUBJECT: Improving New Source Review (NSR) Implementation

FROM: J. Craig Potter
Assistant Administrator
for Air and Radiation (ANR-443)

J. Craig Potter

DER

JAN 22

TO: Regional Administrator
Regions I-X

BAQM

On June 27, 1986, I established a special task force to address growing concerns about the consistency and certainty of permits issued under the Clean Air Act's prevention of significant deterioration and nonattainment area NSR programs. Based on the findings and recommendations of the task force, I am today establishing certain program initiatives designed to improve the timeliness, certainty, and effectiveness of these programs.

A great deal of effort will be required to overcome the problems which have developed, but it is my belief that these problems, with your full cooperation and assistance, can be resolved so that these essential air management programs can fulfill their intended roles. Therefore, I urge each of you to provide the maximum priority and resource commitments available to the task.

The outstanding concern we now face in these programs is inadequate implementation. The Office of Air and Radiation intends to apply its resource commitments so as to enhance its ability to provide technical support and guidance, training, workshops, auditing, and enforcement support to the Regions and delegated programs. The Regional Offices must make a corresponding resource commitment for these efforts to succeed. Accordingly, I am requesting that you initiate a self-evaluation of current NSR activities and, to the extent necessary, refocus Regional attention on these programs in an effort to improve and enhance NSR program implementation.

To ensure that we maintain the flexibility to make this effort a dynamic one, capable of sensing and adjusting to the needs of the program, I intend to establish an informal group of our colleagues to report to me on progress in implementing the initiatives discussed below. The mission of the group is to provide the feedback necessary to maximize the effectiveness of NSR implementation and to make NSR reflective of air program needs.

The following is a list of the specific program initiatives I am hereby instituting to bring about improvements in NSR implementation:

Tracking Permit Actions--Initially and until such time as permit quality can be assured, I am requiring that each Regional Office establish (if not already in place) a program to ensure a timely and comprehensive review of all State and local agency-issued major source permits and certain minor source permits. Implementation of the program will be made part of the Regional Office Management System and will require the "real time" exchange and review of information between the Regional Office and the State and local agencies when a key milestone is reached during the permitting process.

Effective communication between the permitting agency and the Regional Office is essential to improving program implementation. Therefore, the Regional Offices will need to ensure that State and local permitting agencies follow certain notification procedures such as:

- Notify the Regional Office and other affected parties (e.g., the Federal land manager if Class I areas are impacted), within a reasonable time, of the receipt of a new major source permit application. This can take the form of a complete copy of the application itself or a brief description of the proposed project. Notification can be made as each application is received or the information may be submitted to the Regional Office in a periodic report.

- Submit to the Regional Office a complete public notification package at the beginning of the public notice period. The package must contain the public notice language, the proposed permit, and a technical analysis demonstrating how the proposed project complies with the technical review requirements of the regulations [e.g., best available control technology (BACT) or lowest achievable emission rate (LAER), air quality impacts or offsets].

- Submit to the Regional Office a copy of the final preconstruction permit when issued, including a response to any appropriate comments submitted during the public comment period.

- Submit to the Regional Office a copy of the operating permit when issued.

Likewise, when informed of a permit action, the Regional Office is responsible for the timely review of the information, specifically:

- Screen incoming information on permit applications for potential issues or concerns and, if warranted, communicate them to the permitting agency.

- Perform a timely and comprehensive review of the public notice package and, if warranted, provide comment during the public comment period. To aid in this task, I have directed the Office of Air Quality

Planning and Standards (OAQPS) to start work on the development of a permit review checklist for use by the Regional Office during the public comment period. The checklist will also be useful to State and local agencies as a tool for self-audit and to understand what the Environmental Protection Agency (EPA) emphasizes when reviewing a proposed permit.

- Review any response to comments and the final permit to ensure that any outstanding concerns have been resolved satisfactorily.

- Review the permit to operate to ensure that it is consistent with the preconstruction permit.

- Take prompt and appropriate action to deter the issuance or use of permits which fail to meet minimal Federal requirements. I have directed OAQPS to work with the Office of General Counsel and the Office of Enforcement and Compliance Monitoring to develop guidance for the Regional Offices on the appropriate legal mechanisms and procedures for handling deficient permit actions.

- To the extent practicable, prior to permit issuance, review potential minor permit actions which exempt an otherwise major source or modification from a major review (e.g., "synthetic" minor sources, major sources netting out of review, and 99.9 or 249.9 tons per year sources).

The most critical element of these initiatives is the Regional Office review of proposed permit actions during the public comment period. The FY 1985 national air audit showed widespread serious permit deficiencies, many of which could have been corrected without interfering with State and local agency processing if dealt with by EPA during the public comment period. By uniformly reviewing all major source permit actions during the comment period, EPA is able to address deficient reviews or permits before the final permit is issued. This not only promotes more consistency in the permitting process among the States, but also provides the highest degree of certainty to the applicant that the permit will not be challenged by EPA at a later date. Moreover, if the permit is not reviewed and commented on prior to issuance, the possibility of successfully challenging the action is greatly diminished, as is the opportunity to improve the enforceability of the permit.

BACT Determinations--Of all the NSR processes, BACT (and LAER) determinations are perhaps the most misunderstood and the least correctly applied. The BACT alternatives, if presented by the applicant at all, are often poorly documented or biased to achieve the decision the applicant desires.

To bring consistency to the BACT process, I have authorized OAQPS to proceed with developing specific guidance on the use of the "top-down" approach to BACT. The first step in this approach is to determine, for the emission source in question, the most stringent control available for a similar or identical source or source category. If it can be shown that this level of control is technically or economically infeasible for

the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections. Thus, the "top-down" approach shifts the burden of proof to the applicant to justify why the proposed source is unable to apply the best technology available. It also differs from other processes in that it requires the applicant to analyze a control technology only if the applicant opposes that level of control; the other processes required a full analysis of all possible types and levels of control above the baseline case.

The "top-down" approach is essentially already required for municipal waste combustors pursuant to the June 22, 1987, Administrator's remand to Region IX of the H-Power BACT decision and the OAQPS June 26, 1987, "Operational Guidance on Control Technology for New and Modified Municipal Waste Combustors (MWC's)." It is also currently being successfully implemented by many permitting agencies and some of the Regional Offices for all sources. I have therefore determined that it should be adopted across the board.

In the interim, while OAQPS develops specific guidance on the "top-down" process, I am requesting the Regional Office to apply it to their BACT determinations and to strongly encourage State and local agencies to do likewise. Moreover, when a State agency proposes as BACT a level of control that appears to be inconsistent with the "top-down" concept, such as failure to adequately consider the more stringent control options, the Regional Office is to provide comment to that agency. A final BACT determination which still fails to reflect adequate consideration of the factors that would have been relevant using a "top-down" type of analysis shall be considered deficient by EPA.

Training--No formal training workshops specific to NSR have been held since 1980. Many State and local agencies, as well as the Regional Offices, have experienced a high rate of NSR personnel turnover since then. Many of the basic problems that are occurring in NSR implementation can be traced to the lack of comprehensive, continuing training for new Regional Office and State agency personnel.

To rectify this situation, in FY 1988, OAQPS will work on developing materials for a comprehensive training program in the form of Regional workshops to be conducted in FY 1989.

Commencing in FY 1989, biannual Headquarters-sponsored NSR workshops will be conducted at each Regional Office with State and local agencies attendance encouraged. Workshop topics will cover the NSR rules and policy, BACT and LAER determinations, effective permit writing, how to review a proposed permit and audit a permit file, and other program areas as needed. Appropriately trained Regional staff are to then hold these workshops at their respective State agencies. The NSR experts from Headquarters or NSR experts from other Regions will be available to assist.

In addition, Regional Offices should reserve the funds necessary to send at least one EPA staff representative to the NSR workshops (for EPA only) held semiannually at Denver, Colorado (February), and Southern Pines, North Carolina (July). Attendance at these workshops plays a vital role in keeping the Regions up to date on program implementation and new and emerging policy.

Policy and Guidance—Continuous litigation and regulatory changes have combined with the complexity of NSR rules to create a log jam of the policy and guidance needed to help interpret and effectively apply these rules. Therefore, I am directing that in FY 1989 OAQPS dedicate at least one staff person to ensuring a timely response to policy and guidance requests. In the interim, I intend to continue OAQPS's efforts to compile and organize NSR reference and guidance materials, such as the NSR electronic bulletin board.

I realize that the initiatives discussed above constitute only the first steps of a continuing process to address concerns and needs relating to NSR program implementation. In recognition of the possible need to maintain flexibility in managing and improving the NSR process I will, as indicated earlier, establish a group to monitor our progress under this new policy. The group will be comprised of representatives from EPA Headquarters and Regional Offices and we will consult with State and local agency officials as part of our effort to obtain timely feedback as we implement these initiatives.

Additional specific guidance on improvements in the program areas discussed above will be issued in the near future. In the meantime, each Regional Office is directed to work closely with its State and local agencies to ensure that all aspects of the NSR permit programs comply with all applicable State and Federal program requirements.

Your comments and suggestions are welcome. Please direct them to Gary McCutchen, Chief, New Source Review Section, MD-15, Research Triangle Park, North Carolina 27711 (ETS 629-5592).

cc: Air Division Directors, Regions I-X