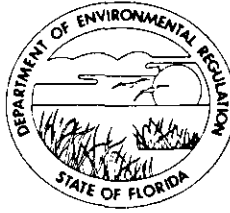


File

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

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

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


December 21, 1987

Enclosed is permit No. AC 17-140962/PSD-FL-126, for Champion International Corporation to install a skid mounted temporary gas fired package boiler, generating 125,000 lbs/hr steam at 600 psig, at Champion's existing facility located in Cantonment, Escambia County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management

Copy furnished to:

E. Middleswart, NW Dist.  
D. Smith, P.E.  
D. Arceneaux, CIC

W. Aronson, EPA  
B. Pittman, Esq.

DEPARTMENT OF ENVIRONMENTAL REGULATION

**ROUTING AND TRANSMITTAL SLIP**

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

*Alan Farney*

Initial

Date

2.

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

**DER**

**DEC 18 1987**

**BAQM**

2.  
 1. Middlebury, W.D. DPT  
 D. Smith, PE  
 D. O'Brien, CIE  
 W. Ormond - JPA  
 B. Pittman - JPA

**INFORMATION**

Review & Return

Review & File

Initial & Forward

**DISPOSITION**

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

*Swachtman*

DATE

PHONE

P 274 007 618

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

\* U.S.G.P.O. 1985-460-794

Mr. T.P. Crane, V.P.  
Champion International Corp.

Street and No.  
P.O. Box 87

P.O. State and ZIP Code  
Cantonment, FL 32533

Postage S

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 S

Postmark or Date

Mailed: 12/21/87  
Permit: AC 17-140962  
Federal: PSD-FL-126

PS Form 3800, June 1985

PS Form 3811, July 1983 747-945

**SENDER: Complete items 1, 2, 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 service(s) requested.

1.  Show to whom (date and address of delivery)

2.  Restricted Delivery

3. Article Addressed to: Mr. T.P. Crane, V.P.  
Operations Manager  
Champion International Corporation  
P.O. Box 87  
Cantonment, FL 32533

4. Type of Service:  
 Registered  Insured  
 Certified  COD  
 Express Mail

Article Number: P-274-007-618

Always obtain signature of addressee or agent and add:  
**DATE DELIVERED:** 12/22/87

5. Signature - Addressee: [Signature]

6. Signature - Agent: [Signature]

7. Date of Delivery: 12/22/87

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

Final Determination

Champion International Corporation  
Cantonment, Escambia County, Florida

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

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

December 16, 1987

## Final Determination

Champion's application to install a skid mounted temporary gas fired boiler at their existing facility in Cantonment, Escambia County, Florida, has been reviewed by the Bureau of Air Quality Management. Public Notice of the Department's Intent to Issue the permit was published in the Pensacola News Journal on November 11, 1987.

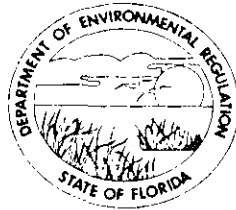
A comment was received from U.S. EPA in response to the Public Notice, in which EPA recommends the consideration of a top-down Best Available Control Technology (BACT) analysis by the applicant (see attachment 4).

The Department does not feel that this particular project of a rental gas fired boiler, to be in operation for a period of two years needs a top-down BACT analysis, which is not yet required by EPA.

The final action of the Department will be to issue the permit as proposed in the preliminary determination.

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

PERMITTEE:  
Champion International Corp.  
Post Office Box 87  
Cantonment, FL 32533

Permit Number: AC 17-140962  
Expiration Date: June 1, 1988  
County: Escambia  
Latitude/Longitude: 30° 36' 19"N  
87° 19' 13"W  
Project: Gas Fired Package Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction of a steam generating facility consisting of a temporary rental gas-fired skid mounted package boiler, at Champion's plant site in Escambia County, Florida. The boiler will have a maximum heat input capacity of 195 MMBtu/hr producing 125,000 lbs/hr steam at 600 psig.

Construction will be in accordance with the permit application and plans, documents and reference material submitted unless otherwise stated in the General and Specific Conditions herein.

This project's federal permit number: PSD-FL-126

Attachments:

1. Champion's Application package dated October 22, 1987.
2. Additional information submitted by Champion, dated October 29, 1987.
3. Champion's letter on boiler details dated, November 5, 1987.
4. EPA's comments dated December 3, 1987.

PERMITTEE:  
Champion International Corp.

Permit Number: AC 17-140962  
Expiration Date: June 1, 1988

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Champion International Corp.

Permit Number: AC 17-140962  
Expiration Date: June 1, 1988

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.



PERMITTEE:  
Champion International Corp.

Permit Number: AC 17-140962  
Expiration Date: June 1, 1988

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:  
Champion International Corp.

Permit Number: AC 17-140962  
Expiration Date: June 1, 1988

**GENERAL CONDITIONS:**

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. The package boiler may operate continuously (8760 hrs/yr) for a maximum period of two years.

2. Only natural gas shall be fired into the boiler. The maximum heat input shall not exceed 195 MMBtu/hr, reflecting a steam generation rate of 125,000 lbs/hr at 600 psig.

3. The maximum allowable emission shall not exceed the following quantities:

PERMITTEE:  
Champion International Corp.

Permit Number: AC 17-140962  
Expiration Date: June 1, 1988

**SPECIFIC CONDITIONS:**

- a) NOx - 0.2 lb/MMBtu heat input  
- 39 lbs/hr  
- 147 tons/yr
- b) CO - 47 lbs/hr  
- 205 tons/yr
- c) Visible Emissions (VE) - 5% opacity

Note: For inventory purposes only the emissions of SO<sub>2</sub>, PM, and VOC are tabulated below:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>	<u>TPY (tons per year)</u>
SO <sub>2</sub>	0.0006	0.12	1
PM	0.005	1	4
VOC	0.003	1	4

Good combustion practices shall be observed as control measures for PM, SO<sub>2</sub>, and VOC.

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

- a) EPA Method 7 for NOx
- 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.

5. DER's district office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the district office with 45 days of test completion.

The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (Rule 17-2, FAC)

PERMITTEE:  
Champion International Corp.

Permit Number: AC 17-140962  
Expiration Date: June 1, 1988

**SPECIFIC CONDITIONS:**

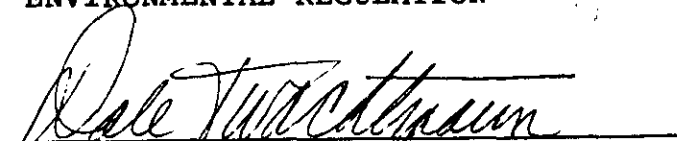
To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to the Department's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rule 17-2 and 17-4, FAC)

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4, FAC)

6. Any change in the method of operation, fuels, equipment or operating hours shall be submitted for approval to DER's District office.

Issued this 17 day of Dec, 1987

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL REGULATION

  
Dale Twachtman, Secretary

Best Available Control Technology (BACT) Determination  
Champion International Corporation  
Escambia County

The applicant plans to install a 195 MMBtu/hr natural gas fired boiler at their facility in Cantonment, Florida. The boiler, a skid mounted rental package unit, will be used only temporarily until existing boilers can be repaired or replaced to supply the necessary steam load. The temporary boiler is scheduled to operate 8,760 hours per year.

A BACT determination is required for particulates and sulfur dioxide as set forth in the Florida Administrative Code Rule 17-2.600 (6) - Emissions Limiting and Performance Standards. In addition, the Department has performed a BACT determination for nitrogen oxides (NOx) and carbon monoxide (CO) based on the assumption that the emissions increase of NOx and CO could be greater than the PSD significant rate of 40 and 100 tons per year respectively. The Department which is presently awaiting information that would indicate if BACT for NOx and CO would indeed apply, has decided to go ahead with making a determination of BACT for NOx and CO to expedite the processing of the permit.

BACT Determination Request by the Applicant:

Particulate, sulfur dioxide, nitrogen oxides and carbon monoxide emissions to be controlled by the firing of natural gas.

Date of Receipt of a BACT Application:

October 22, 1987

Review Group Members:

The determination was based upon comments received from the Stationary Source Control Section.

BACT Determined by DER:

The amount of particulate and sulfur dioxide emissions from the boiler will be limited by the firing of natural gas.

Visible Emissions Not to exceed 5% opacity.

DER Method 9 (17-2.700(6)(a)9, FAC) will be used to determine compliance with the opacity standard.

Nitrogen oxides emissions shall not exceed 0.20 lb/MMBtu heat input.

Carbon monoxide emissions shall not exceed 46.8 pounds per hour.

BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern in that most of the fuel sulfur becomes SO<sub>2</sub> and particulate emissions from fuel burning are related to the sulfur content. The Department agrees with the applicant's proposal that the firing of natural gas is BACT for particulates and SO<sub>2</sub>.

The emission rate of nitrogen oxides proposed by the applicant is equivalent to 0.20 pounds per million Btu heat input. This proposed emission rate is equal to the New Source Performance Standard (NSPS) for natural gas steam generating units with heat input capacities greater than 100 million Btu/hr and maximum design heat release rates greater than 70,000 Btu/hr-ft<sup>3</sup>. In addition to meeting the NSPS for these steam generating units, a review of other BACT determinations for natural gas fired boilers indicates that the proposed emission level for both nitrogen oxides and carbon monoxide is consistent with several of the determinations on record. In accordance with this criteria and the temporary nature of this installation, the applicant's proposed NOX and CO emission rates are justified as being BACT for this source.

Details of the Analysis May be Obtained by Contacting:

Barry Andrews, P.E. BACT Coordinator  
Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blainstone Road  
Tallahassee, Florida 32399-2400

Recommended by:




C. H. Fancy, P.E.  
Deputy Bureau Chief, BAQM

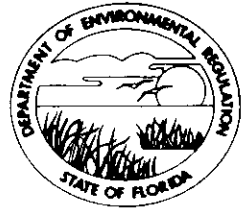
12/17/87

Date

Approved by:

  
Dale Twachtmann, Secretary

17 Dec 87  
Date



# Interoffice Memorandum

For Routing To Other Than The Addressee

To _____	Location: _____
To _____	Location: _____
To _____	Location: _____
From _____	Date _____

TO: Dale Twachtmann  
THRU: Howard Rhodes *HR*  
FROM: Clair Fancy *CF*  
DATE: December 16, 1987  
SUBJ: Approval of Champion International Cooperation  
State Construction Permit Number: AC 17-140962  
Federal PSD Number: PSD-FL-126

Attached for your approval and signature is a permit for the above mentioned company to install a skid mounted temporary gas fired boiler at their existing facility in Cantonment, Escambia County, Florida. Comments were received during the public notice period.

Day 90 after which these permits will be issued by default is February 25, 1988.

The Bureau recommends approval and signature.

CHF/MJ/s  
attachment

**RECEIVED**  
DEC 17 1987

Office of the Secretary

DER  
DEC 17 1987  
BAQM