## STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMIT

In the matter of an Application for Permit by:

DER File No. AC 17-192933 PSD-FL-126A Escambia County

Champion International Corp. Post Office Box 87

Cantonment, Florida 32533

Enclosed is Permit Number AC 17-192933 to permanently install a temporarily permitted gas fired package boiler at Champion's existing facility in Cantonment, Escambia County, Florida, issued pursuant to Section(s) 403, Florida Statutes.

Any party to this Order (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 Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Clair H. Fancy, P.E., Chief Bureau of Air Regulation 2600 Blair Stone Road

Tallahassee, FL 32399-2400

904-488-1344

#### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 1 - 10 - 91 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to \$120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk)

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Copies furnished to:

- E. Middleswart, NWD
- R. Reynolds, P.E.
- E. Inman, CIC G. Worley, EPA

#### Final Determination

Champion International Corporation Escambia County Cantonment, Florida

No. 5 Gas Fired Package Boiler Permit No. AC 17-192933 PSD-FL-126A

Department of Environmental Regulation Division of Air Resources Management Bureau of Air Regulation

#### Final Determination

The Technical Evaluation and Preliminary Determination for the permit to permanently install a temporarily permitted gas fired package boiler at Champion International Corporation in Cantonment, Escambia County, Florida, was distributed on May 8, 1991. The Notice of Intent to Issue was published in the Pensacola News Journal on May 18, 1991. Copies of the evaluation were available for public inspection at the Department's Tallahassee and Pensacola offices.

No comments were submitted on the Department's Intent to Issue the permit. The final action of the Department will be to issue construction permit AC 17-192933, PSD-FL-126A as proposed in the Technical Evaluation and Preliminary Determination.



### Florida Department of Environmental Regulation

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400 Lawton Chiles, Governor

Carol M. Browner, Secretary

Champion International Corp. Post Office Box 87 Cantonment, Florida 32533

Permit Number: AC 17-192933 PSD-FL-126A

Expiration Date: Dec. 31, 1991

County: Escambia

Latitude/Longitude: 30°36'19"N

87°19'13"W

Project: No. 5 Gas Fired Package

Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 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 permanent installation of a steam generating facility consisting of a skid mounted gas fired 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.

source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

#### Attachments are listed below:

- Champion's Application package received February 25, 1991.
- Additional Information submitted by Champion dated March 6, 1991.

Recycled Paper

Permit Number: AC 17-192933 PSD-FL-126A

Expiration Date: December 31, 1991

#### GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

- 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. Neither 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 is not 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; 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.

Permit Number: AC 17-192933 PSD-FL-126A

Expiration Date: December 31, 1991

#### GENERAL CONDITIONS:

6. The permittee shall 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - c. Sample or monitor 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 provide the Department with the following information:
  - a. a description of and cause of non-compliance; and
  - b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

Permit Number: AC 17-192933 PSD-FL-126A

Expiration Date: December 31, 1991

#### **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 for 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- 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 17-4.120 and 17-30.300, F.A.C., 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 or a copy thereof shall be kept at the work site of the permitted activity.
- 13. This permit also constitutes:
  - (x) Determination of Best Available Control Technology (BACT)
  - (x) Determination of Prevention of Significant Deterioration (PSD)
- 14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

Permit Number: AC 17-192933 PSD-FL-126A

Expiration Date: December 31, 1991

#### **GENERAL CONDITIONS:**

b. The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained 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 dates 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 corrected promptly.

#### SPECIFIC CONDITIONS:

- 1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.
- 2. The package boiler may operate continuously (8760 hrs/yr).
- 3. Only natural gas shall be fired in 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.
- 4. The maximum allowable NOx emissions shall not exceed 19.5 lbs/hr and 85.4 tons/yr.

Permit Number: AC 17-192933 PSD-FL-126A

Expiration Date: December 31, 1991

#### SPECIFIC CONDITIONS:

5. Visible emissions (VE) shall not exceed 5% opacity.

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

EPA Method 7 for NOx DER Method 9 for VE

- 7. The Department shall be notified in writing 15 days or more prior to each compliance test. The tests shall be conducted at permitted production capacity or no less than 90% thereof. Actual heat input rate during the test shall be reported along with the emission results. Test reports shall be submitted to the Department's Northwest District office within 45 days of compliance test completion.
- 8. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
- 9. An application for an operation permit must be submitted to the Northwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

ssued this 6 day

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Carol M. Browner

Secretary

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

The applicant plans to permanently install a temporarily-permitted 195 MMBtu/hr natural gas fired boiler at their facility in Cantonment, Florida. The boiler is a skid mounted package unit and will be used to supply process steam. The 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 performed a BACT determination for nitrogen oxides (NOx) since those emissions are greater than the PSD significant rate of 40 tons per year.

#### BACT Determination Request by the Applicant:

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

#### Date of Receipt of a BACT Application:

February 25, 1991

#### 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 shall not exceed 5% opacity.

Nitrogen oxides emissions shall not exceed 0.10 lbs/MMBtu heat input.

#### **BACT Determination Rationale:**

Sulfur in fuel is a primary air pollution concern in that most of the fuel sulfur becomes  $SO_2$  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  $SO_2$ .

The emission rate of nitrogen oxides proposed by the applicant is equivalent to 0.10 pound per million Btu heat input. This proposed emission rate is half of 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>. A review of other BACT determinations for natural gas fired boilers indicates that the proposed emission level for nitrogen oxides meets or exceeds

several of the determinations on record. Additional NOx control could be provided by using add on control devices such as selective catalytic reduction (SCR) or selective non catalytic reduction (SNCR). A review of these control technologies indicates a cost effectiveness ranging from \$7,470 to \$8,100 per ton of NOx removed. These costs exceed those which have been previously judged to be representative of BACT, thereby dismissing these technologies as BACT for this facility. In accordance with these criteria, the applicant's proposed NOx emission rate is justified as BACT for this source.

### Details of the Analysis May be Obtained by Contacting:

Barry Andrews, P.E.
Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended by:	Approved by:
CH July	the Smellerod
C. H. Fancy, P.E., Chief Bureau of Air Regulation	Carol M. Browner, Secretary Dept. of Environmental Regulation
July 10, 1991	<u>July /b</u> 1991



## State of Florida DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addresses		
To:	Location:	
To:	Location:	
To:	Location:	
From:	Oate:	

# Interoffice Memorandum

TO: Carol M. Browner

FROM: Steve Smallwood

DATE: July 10, 1991

SUBJ: Approval of Construction Permit AC 17-192933, PSD-FL-126A

Champion International Corporation

Attached for your approval and signature is a permit and corresponding Best Available Control Technology (BACT) determination prepared by the Bureau of Air Regulation for the above mentioned company to permanently install a temporarily permitted gas fired package boiler at Champion's facility in Cantonment, Florida.

No comments were received during the public notice period.

I recommend your approval and signature.

SS/JR/plm

Attachments



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION IV

345 COURTLAND STREET, N.E.

4APT-AEB

NTA GEORGIA 30365

RECEIVED

JUN 0 3 **19**91

Division of Air Resources Management

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

Champion International Corporation (PSD-FL-126A)

Dear Mr. Fancy:

This is to acknowledge receipt of your preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the above referenced facility by letter dated May 8, 1991. The application requests a PSD permit for the natural gas-fired Package Boiler #5 which previously operated under a temporary permit. The applicant has proposed a NO $_{\chi}$  emission limit of 0.1 lb/MMBTU to be achieved through a combination of flue gas recirculation and a low NO, burner. We have reviewed the package as requested and have no adverse comments.

Thank you for the opportunity to review and comment on this package. If you have any questions or comments, please contact Mr. Gregg Worley of my staff at (404) 347-2904.

Sincerely yours

Jewell A. Harper, Chief Air Emforcement Branch

Air, Pesticides, and Toxics

Management Division

cc: J. Remolds C. Hallady E. Andrews

G. middleswart, NW Dist

### E46 PE2 SE8 9

Certified Mail Receipt
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

	Sent to		
	Mr. F. Doug Owen		
ŀ	Street & No.	Int.	
ĺ	P. O. Box 87		
	PO., State & ZIP Code		
	Cantonment, FL 32533		
	Postage	\$	
Form <b>3800</b> , June 1990	Certified Fee		
	Special Delivery Fee		
	Restricted Delivery Fee		
	Return Receipt Showing to Whom & Date Delivered		
	Return Receipt Showing to Whom, Date, & Address of Delivery		
ج ⊙	TOTAL Postage & Fees	\$	
8	Postmark or Date		
ے ص	Mailed: 7-17-91		
ō	Permit: AC 17-1		
PS	PSD-FL-	1	

<ul> <li>Complete items 1 and/or 2 for additional services.</li> <li>Complete items 3, and 4a &amp; b.</li> <li>Print your name and address on the reverse of this that we can return this card to you.</li> <li>Attach this form to the front of the mailpiece, or or back if space does not permit.</li> <li>Write "Return Receipt Requested" on the mailpiece the article number.</li> </ul>	1. Addressee's Address e next to Consult postmaster for fee.
Mr. F. Doug Owenby, Vice Pres. Oerations Manager Champion International Corporati P. O. Box 87 Cantonment, FL 32533	7. Date of Delivery Division of All its assources Management
5 Signature (Addressee)  6. Signature (Agent)  PS Form 3811, October 1990  ±U.S. GPO: 1990—273-	and fee is paid)