



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4APT-AEB

MAR 26 1991

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

RECEIVED

MAR 29 1991

DER-BAQM

RE: Champion International Corporation

Dear Mr. Fancy:

This letter is to confirm EPA's position concerning the extension of permits for temporary emission sources as discussed between Mr. Bruce Mitchell of your staff and Mr. Gregg Worley of my staff. As we understand the issue, Champion was issued a permit for a package boiler which was intended to be a temporary source. The permit for the boiler expires on April 1, 1991. Champion now wishes to make the boiler a permanent source and to that end, has applied for a Prevention of Significant Deterioration (PSD) permit. The source would like to extend the temporary permit until such time as they can receive a PSD permit.

The package boiler was originally permitted pursuant to Florida regulation 17-2.500(3)(c). Based upon a review of this regulation, FDER correctly determined that a permit for a temporary source may not exceed two years and may not be extended. Based upon this information, Champion had their attorney prepare an interpretation of the situation. In a letter from attorney Robert Meyer to Charles Ayer of Champion, dated March 1, 1991, several assumptions and interpretations were presented in support of Champion's position. Our comments on this letter are as follows.

The first misconception about the regulations arises from the attorney's apparent belief that Florida has a delegated PSD program. As you know, Florida has a PSD program which has been federally approved in the State Implementation Plan (SIP) pursuant to 40 CFR Part 51, Subpart I. The specific requirements relating to the permitting of temporary (other than portable) sources are found in §51.166(i)(6) and §51.166(f)(4). These passages read as follows:

(i)(6) The plan may provide that requirements equivalent to those contained in paragraphs (k), (m), and (o) of this section do not apply to a proposed major stationary source or major modification with respect to a particular pollutant, if the allowable emissions of that pollutant from a new source, or the net emissions increase of that pollutant from a modification, would be temporary and impact no Class I area and no area where an applicable increment is known to be violated.

(f)(4) For purposes of excluding concentrations pursuant to paragraph (f)(1)(v) of this section, the Administrator may approve a plan revision that:

(i) Specifies the time over which the temporary emissions increase of sulfur dioxide, particulate matter, or nitrogen oxides would occur. Such time is not to exceed 2 years in duration unless a longer time is approved by the Administrator. (emphasis added)

(ii) Specifies that the time period for excluding certain contributions in accordance with paragraph (f)(4)(i) of this section is not renewable;

(iii) Allows no emissions increase from a stationary source which would:

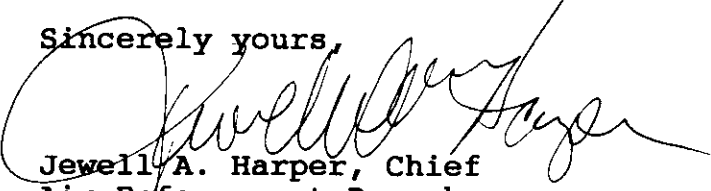
- (a) Impact a Class I area or an area where the increment is known to be violated; or
- (b) Cause or contribute to the violation of a national ambient air quality standard;

(iv) Requires limitations to be in effect at the end of the time period specified in accordance with paragraph (f)(4)(i) of this section, which would ensure that the emissions levels from stationary sources affected by the plan revision would not exceed those levels occurring from such sources before the plan revision was approved.

Clearly, the time period approved by the Administrator is the two year period specified in Florida regulation 17-2.500(3)(c) as part of the Florida SIP pursuant to the above referenced regulations. The time period must be set in the general plan (and has been), not decided on a case-by-case basis. FDER's determination on this issue is correct and in accordance with the federally approved SIP.

If you have any questions on these comments, please contact Mr. Gregg Worley of my staff at (404) 347-2904.

Sincerely yours,


Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: R. Bruce Mitchell, FDER

Chair,

FYI. Please return
to Patly Sec 511j.
Shelton,
Bum

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

MAR 26 1991

cc: Steve
Gary - hand delivered
Candy - read a copy in
Gary's office
Barry

Fancy, P.E., Chief
Regulation
Department of Environmental

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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-2-

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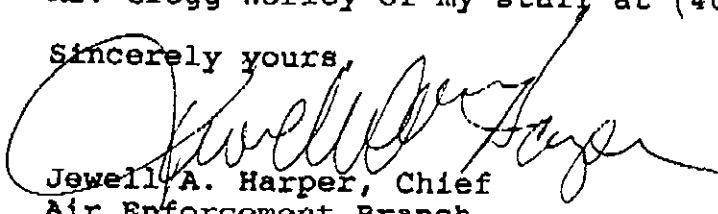
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Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: R. Bruce Mitchell, FDER

Was FAX'd to ECA

on 3-27-91.

Bmm

IV • BRUCE MITCHELL
JOHN REYNOLDS

RECEIVED

MAR 19 1991

DER-BAQM

PORTER, WRIGHT,
MORRIS & ARTHUR
ATTORNEYS AT LAW

ROBERT A. MEYER, JR.

COLUMBUS, OHIO

(614) 227-2242

41 SOUTH HIGH STREET, COLUMBUS, OHIO 43215-3406

TELECOPIER: (614) 227-2100

TELEX: 6503213584

OTHER FIRM LOCATIONS:

CINCINNATI, OHIO

CLEVELAND, OHIO

DAYTON, OHIO

NAPLES, FLORIDA

WASHINGTON, D.C.

March 1, 1991

Charles Ayer
Champion International Corporation
One Champion Plaza
Stamford, CT 06921

Re: The Term "Temporary" in Conjunction
with PSD Requirements

Dear Charles:

This letter is in response to your request that we address the question of the meaning of the term "temporary" in conjunction with exemptions from full PSD review for temporary sources, and more particularly, whether if a temporary source has been authorized for a period of two years, authority exists to extend the temporary period pending full PSD permitting to authorize the source on a permanent basis. This question arises in the context of a temporary source which had been authorized by the State of Florida, pursuant to its delegated PSD authority after an abbreviated PSD review, and which Champion now desires to convert the source to a permanent operation.

The PSD rules provide exclusions from PSD review for temporary sources in two cases. First, under 40 CFR §52.21(i)(4)(viii), virtually all of the PSD permitting requirements are eliminated for the relocation of a portable source (which has previously received a permit) if, among other things, the new location would be temporary. Second, 40 CFR §52.21(6) excuses a major stationary source or major modification from the source impact analysis, air quality analysis, and additional impact analysis requirements of the PSD rules for temporary sources in certain cases. It is my understanding your situation arises under the second provision.

The term "temporary" is not defined in the PSD rules, nor do the rules contain any express time limits for the operation of temporary sources. USEPA's policy in several contexts has been to

Charles Ayer
March 1, 1991
Page Two

establish two years as the presumptive limit on "temporary," but longer periods are contemplated in appropriate cases. For example, USEPA has long regarded source shutdowns lasting longer than two years as raising a rebuttable presumption that the shutdown is permanent (and hence subject to new source review before restarting), but also recognizes that much longer periods can be justified as temporary. Further, and in the specific context of temporary sources for PSD purposes, USEPA stated in the preamble to those rules:

Existing EPA policy defines temporary emissions as emissions from a stationary source that would be less than two years in duration, unless the Administrator determines that a longer time period would be appropriate. (Emphasis added.)
45 Fed. Reg. 52728, Col. 1 (August 7, 1980).

When EPA has intended to prescribe fixed time requirements, it has clearly done so in its rules (i.e., eighteen month periods for construction, five year periods for netting "contemporaneous" emissions); no such limitation is set forth with respect to "temporary" sources. Finally, in exempting "temporary" clean coal technology projects from PSD review, Congress in the 1990 Clean Air Act Amendments defined temporary sources as those operating for five years or less. Section 415(b)(2) of the Clean Air Act as amended.

Based on the foregoing, the State of Florida, pursuant to its PSD delegation, has authority to determine that a period longer than two years can be "temporary." This extended period could allow Champion to seek, through full PSD review, authorization to continue the source on a permanent basis if that is Champion's ultimate decision. At the end of the extended temporary period, Champion would have either secured the authorization to continue operation of the source on a permanent basis, or, if such authorization were not secured, would discontinue the source at the conclusion of the extended temporary period. Particularly given the fact that an abbreviated PSD review process has already been undertaken, a determination "that a longer time period would be appropriate" seems warranted.

I hope the foregoing is helpful. Please let me know if there is anything further I can provide you with respect to this matter.

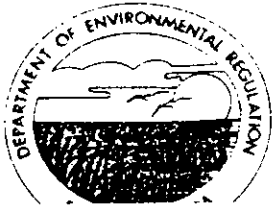
Very truly yours,



Robert A. Meyer, Jr.

cc: Benjamin S. Bilus, Esq.
J. Jeffrey McNealey, Esq.

PORTER, WRIGHT,
MORRIS & ARTHUR



File Copy
P-10-FL-126A

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Lawton Chiles, Governor Carol M. Browner, Secretary

MESSAGE CONFIRMATION

MAR-19-'91 TUE 14:11

TERM ID: DIV OF AIR RES MGMT P-9999
TEL NO: 904-922-8979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
567	03-19	14:09	08:02:03	404 347 5207		03	00

DATE: 3-19-91

TO:

NAME: Mr. Gregg Worley
AGENCY: U.S. EPA, Region IV

TELEPHONE: (404) 347-5207

OF PAGES (INCLUDE COVER SHEET): 3

FROM:

NAME: Bruce Mitchell

AGENCY: FDER/DABM/BAR

IF ANY PAGES ARE NOT CLEARLY RECEIVED, PLEASE CALL IMMEDIATELY. PHONE NO. (904) 488-1344

SENDER'S NAME: Same

COMMENTS: Rebuttal offered by representatives for Champion International Corp. regarding their package boiler and its temporary (2-year) permit. Even though CIC has applied for a P20 permit (P20-FL-126A), they have been notified verbally, that they are to shut the source down by April, 1991. According to our SIP (17-2.500(3)(c)(1)), the advisement is correct. Does this attachment alter this, in your opinion?

Stamba,
RAM

cc: John Reynolds }
BAIC#F }
Ready File } 3-19-91 RAL

FAX 922-6979

TO: CLAIR FANCY FROM: ED INMAN
LOCATION: Tallahassee, FL LOCATION: PENSACOLA, FL

COMMENTS: ATTN: BRUCE MITCHELL
JOHN REYNOLDS

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MAR 19 1991
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FC-1129

**PORTER, WRIGHT,
MORRIS & ARTHUR**
ATTORNEYS AT LAW

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cc: Benjamin S. Bilus, Esq.
J. Jeffrey McNealey, Esq.

PORTER, WRIGHT,
MORRIS & ARTHUR

BAIC HF

John Reynolds

Drum Mitchell

Gress Worley, EPA (FAX'd)

} 3-14-91 RAM

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



March 6, 1991

Mr. Bruce Mitchell
Engineer
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject:

Dear Mr. Mitchell,

Please find attached Champion's submittal regarding the issue of permitted steam capacity with the addition of the proposed No. 5 Power Boiler. A PSD Construction Permit Application was submitted to the agency 2/22/91. This submittal should be included as an integral part of the No. 5 Power Boiler PSD application.

Please contact me at extension (904) 968-2121 x2517 if you have any questions or comments regarding this submittal.

Sincerely,

Edward M. Inman

Edward M. Inman
Senior Process Engineer
Technical & Environmental Department

EMI:sa

RECEIVED
MAR 11 1991
DER-BAQM

FEDERAL EXPRESS

QUESTIONS? CALL 800-238-5355 TOLL FREE

AIRBILL
PACKAGE
TRACKING NUMBER

0431907755

1050M

0431907755

RECIPIENT'S COPY

From (Your Name) Please Print ED WINMAN Company CHAMPION INTERNATIONAL Street Address 175 MUSCOGEE RD City CANTONMENT State FL ZIP Required 3 2 5 3 3		Date 3/8/91 Your Phone Number (Very Important) _____ To (Recipient's Name) Please Print MR. BRUCE MITCHELL Company FLA. DEPT. OF ENVIRONMENTAL REGULATION Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip * Codes.) 2600 BLAIR STONE ROAD City TALLAHASSEE State FL ZIP Required 32399-2400	
YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice) _____		IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address _____ City _____ State _____ ZIP Required _____	
PAYMENT <input checked="" type="checkbox"/> Bill Sender <input type="checkbox"/> Bill Recipient's FedEx Acct No <input type="checkbox"/> Bill 3rd Party FedEx Acct No <input type="checkbox"/> Bill Credit Card <input type="checkbox"/> Cash <input type="checkbox"/> Check		Emp No _____ Date _____ Federal Express Use <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg To Del <input type="checkbox"/> Chg To Hold Street Address _____ City _____ State _____ Zip _____ Received By _____ Date/Time Received _____ FedEx Employee Number _____	
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PACKAGES _____ WEIGHT # Pieces Only _____ YOUR DECLARED VALUE _____ Total Total Total		DIM SHIPMENT (Chargeable Weight) <input type="checkbox"/> _____ lbs Received At 1 <input type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input type="checkbox"/> On-Call Stop 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station Release Signature _____ Date/Time 3 8 15 15	
Base Charges _____ Declared Value Charge _____ Other 1 _____ Other 2 _____ Total Charges _____		REVISION DATE 8/90 PART #119501 FXEM 2/01 FORMAT #041 041 * 1990 F.E.C. PRINTED IN U.S.A.	

CHAMPION INTERNATIONAL CORPORATION

Pensacola Mill

No. 5 Power Boiler PSD Application

The Florida Department of Environmental Regulation (FDER) has requested that Champion demonstrate that the additional steam capacity resulting from the addition of No. 5 Power Boiler is not for purposes of pulp production increases.

As illustrated in Table 1, Champion has a current steam capacity of 1.707 million pounds per hour without No. 5 boiler. For the two years back from October 1990, the mill has averaged 1283 bleached tons pulp per day and 24 KLB steam per ton bleached pulp as shown in Table 2. Projecting steam requirements for current annual and maximum day permitted production levels, the steam demand would be 1.458 and 1.690 million pounds per hour respectively. This clearly shows that Champion has the capacity to produce permitted pulp production rates without the No. 5 Power Boiler.

The No. 2 Power Boiler steam production capacity was reduced to 80 KLB steam in 1990 due to boiler degradation. With this permit application the No. 1 Power Boiler steam capacity will be reduced to 120 KLB steam per hour due to boiler degradation. This is shown in Table 1. These steam production levels represent a new maximum continuous rating for the No. 1 and No. 2 Power Boilers. Based on these two changes, a 80 KLB per hour steam capacity reduction occurred at the mill.

Figure 1 shows the Pensacola Mill's actual steam and bleached pulp production prior to and after No. 5 boiler start-up late in January, 1988. The steam production level for January 1988 represented by "Total minus No. 5" is the maximum actual total mill steam production level without No. 5 Power Boiler. This level is 1.4 million pounds steam per hour. The Pensacola Mill has not exceeded this monthly steam production level to date with the No. 5 Power Boiler.

Finally, Figure 2 shows steam production for the No.1, 2, and 5 boilers from October 1988 - October 1990. This figure clearly demonstrates that No. 1 and No. 2 boilers steam production decreased after No. 5 boiler start-up. Figure 2 also shows that total steam production by No. 1, 2, and 5 boilers has been less than the original permit levels for No. 1 and No. 2 (280 KLB/Hr), less than the current permit levels for No. 1 and No. 2 (220 KLB/Hr), and less than the requested new permit levels for No. 1 and No. 2 (200 KLB/Hr). This further supports the contention that the small increase in permitted steam production capacity by No. 5 boiler is not utilized for any process increases.

CHAMPION INTERNATIONAL CORPORATION

Pensacola Mill

-----TABLE 1-----

PERMITTED STEAM PRODUCTION RATES

<u>SOURCE</u>	<u>KLB STEAM/HOUR</u>		
	<u>1989</u>	<u>1990</u>	<u>1991</u>
No. 1 Power Boiler	140	140	120
No. 2 Power Boiler	140	80	80
No. 3 Power Boiler	209	209	209
No. 4 Power Boiler	415.3	415.3	415.3
No. 5 Power Boiler	0	0	125
No. 1 Recovery Boiler	431.6	431.6	431.6
<u>No. 2 Recovery Boiler</u>	<u>431.6</u>	<u>431.6</u>	<u>431.6</u>
TOTAL	1,767.4	1,707.4	1,812.4
NET CHANGE	0 KLB	-60 KLB	+45 KLB

-----TABLE 2-----

BLEACHED PULP PRODUCTION STEAM RELATIONSHIP

10/88 - 10/90 Bleached Pulp Production	1283 ADBT/Calendar Day
10/88 - 10/90 Steam Production	24 KLB Steam/ADBT
Maximum Permitted Pulp Production - Annual average	1400 ADBT/Calendar Day
Maximum Permitted Pulp Production - Daily maximum	1690 ADBT/Calendar Day

CONSERVATIVE ASSUMPTION: Steam demand per ton bleached pulp production remains at 24,000 pounds steam per air dry bleached ton pulp up to the maximum permitted bleached pulp production rates.....

$$1400 \text{ ADBT/D} \times 24 \text{ KLB/ADBT} \times \text{D}/24 \text{ Hours} = \mathbf{1.458 \text{ MMLB Steam/Hour}}$$

$$1690 \text{ ADBT/D} \times 24 \text{ KLB/ADBT} \times \text{D}/24 \text{ Hours} = \mathbf{1.690 \text{ MMLB Steam/Hour}}$$

FIGURE 1
No. 5 Power Boiler PSD Application
Pulp & Steam Production Before & After No. 5 Boiler Start-up

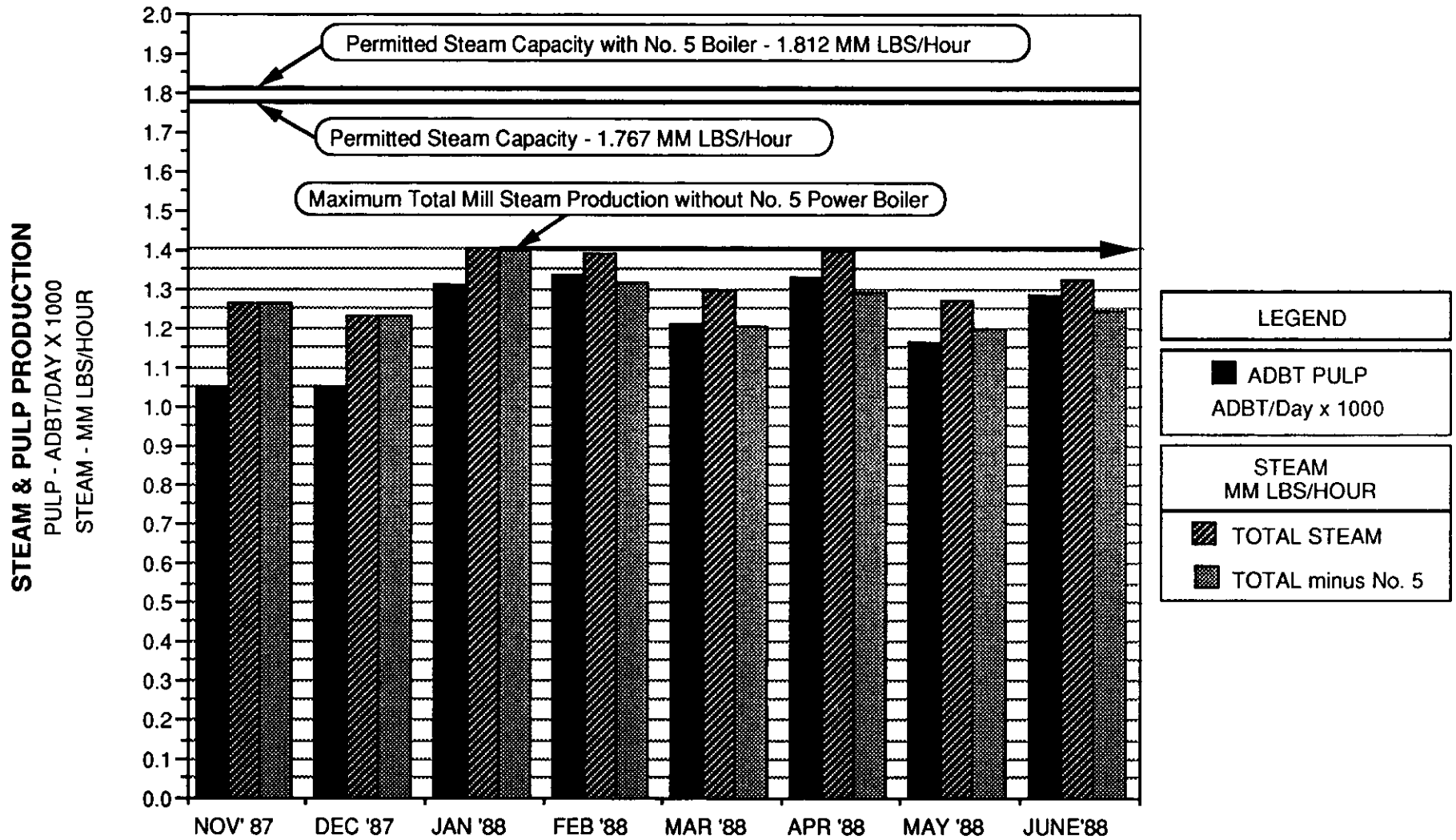
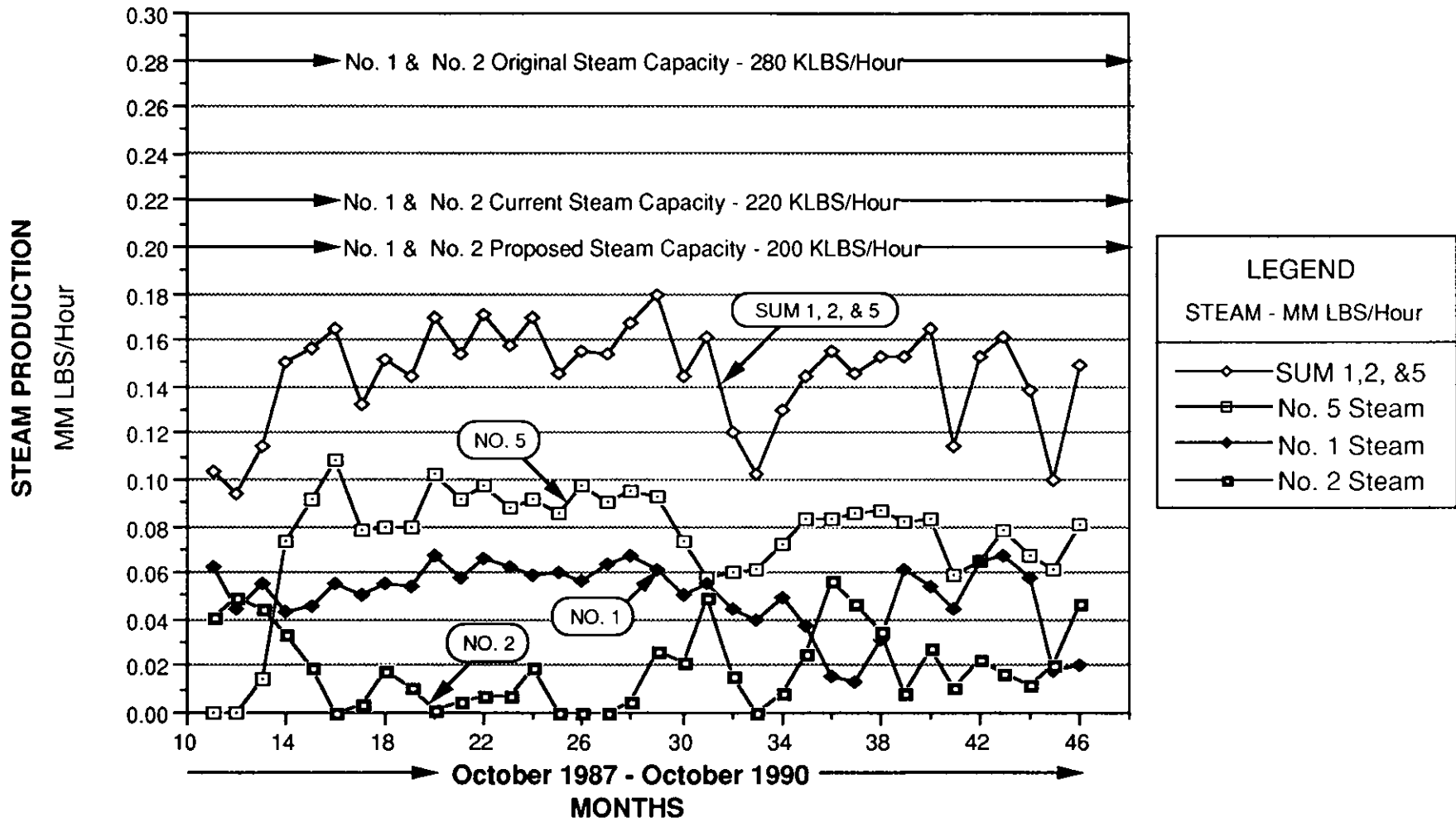


FIGURE 2
No. 5 Power Boiler PSD Application
No.1, 2, & 5 Power Boilers Steam Production



FAX 922-6979

TO: BRUCE MITCHELL / JOHN REYNOLDS FROM: ED INMAN (904) 968-2121 x2517

LOCATION: Tallahassee, FL LOCATION: Pensacola, FL

COMMENTS: *Hard copy in mail. Please call if you do not receive all 5 pages or FAX is not good quality. Also, please contact me if you have any questions regarding this.
Thank you,
Ed Inman*

FC-1129
904 968-2121



March 6, 1991

Mr. Bruce Mitchell
Engineer
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject:

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Senior Process Engineer
Technical & Environmental Department

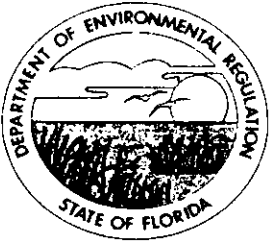
EMI:sa

3-8-91, a.m.

Spoke w David Arseneau and requested that pages 2 and 3 be FAX'd again to the BAR due to poor readability of the original FAX.

cc: John Reynolds
Cleve Holladay
Ed Middleworth, N.E. Dist } 3-8-91 AM

Bruce Mitchell



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

March 5, 1991

Ms. Jewell A. Harper, Chief
Air Enforcement Branch
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Ms. Harper:

RE: Champion International Corporation
Escambia County
PSD-FL-126A

Enclosed for your review and comment is the above referenced PSD permit application. If you have any comments or questions, please contact John Reynolds, Barry Andrews, or Cleve Holladay at the above address or at (904)488-1344.

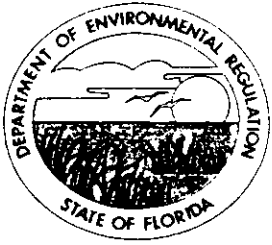
Sincerely,

Patricia G. Adams

Patricia G. Adams
Planner
Bureau of Air Regulation

/pa

Enclosure



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

March 5, 1991

Mr. Richard E. Grusnick, Chief
Air Division
Alabama Dept. of Environmental Management
State Capitol
Montgomery, Alabama 36130

Dear Mr. Grusnick:

RE: Champion International Corporation
Escambia County
PSD-FL-126A

Enclosed for your review and comment is the above referenced PSD permit application. If you have any comments or questions, please contact John Reynolds, Barry Andrews, or Cleve Holladay at the above address or at (904)488-1344.

Sincerely,

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