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# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

February 12, 2004

CERTIFIED MAIL - Return Receipt Requested

Ms. Nicki S. Slusser, Mill Manager  
International Paper Company  
Pensacola Mill  
375 Muscogee Road  
Cantonment, Florida 32533-0087

Re: DEP File No. 0330042-008-AC/PSD-FL-335  
Pensacola Mill  
Pulp Production Increase

Dear Ms. Slusser:

The Department reviewed for completeness the application received on August 1, 2003, for an increase in pulp production from 1500 tons per day (TPD) air dried bleached tons pulp (ADBTP) to 1650 TPD ADBTP at the above referenced existing facility in Escambia County. Based on the initial review, a letter requesting additional information was sent certified on August 29, 2003. A response to that letter has not yet been received.

The rule for establishing "Contemporaneous Emissions Changes" under PSD preconstruction review is contained at Rule 62-212.400(2)(e), F.A.C., which states that "an increase or decrease in the actual emissions, or in the quantifiable fugitive emissions, of a facility is contemporaneous with a particular modification if it occurs within the period beginning five (5) years prior to the date on which the owner or operator of the facility submits a complete application for a permit to modify the facility, and ending on the date on which the owner or operator of the facility projects the new or modified facility to begin operation". The definition of "Actual Emissions" at Rule 62-210.200, F.A.C., states that "in general, actual emissions as of a particular date shall equal that average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a two year period which precedes the particular date and which is representative of the normal operation of the emissions unit. The Department may allow the use of a different time period upon a determination that it is more representative of the normal operation of the emissions unit. Actual emissions shall be calculated using the emissions unit's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period." For the application package received on August 1, 2003, the years "1998 and 1999" were selected as the years for consideration for this aspect of the PSD approach. Since the application is still incomplete, all of 1998 and some of 1999 is outside the 5 year window and is no longer contemporaneous. Therefore, please change the appropriate parts of the application and resubmit them pursuant to this issue. In addition, the same timeframe that you use for the contemporaneous calculations is to be used for the PSD increment evaluation. Therefore, please submit, if appropriate, the new information for the PSD increment evaluation.

"More Protection, Less Process"

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Ms. Nicki S. Slusser, Mill Manager  
International Paper Company  
Pensacola Mill  
DEP File No. 0330042-008-AC/PSD-FL-335  
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In an attempt to find a viable way to permit your mill's expansion project independent of the Gulf Power Crist Plant's issues that are under the Department's review, we have remodeled your mill's SO<sub>2</sub> emissions data provided in the application. Several runs were conducted while reducing the allowable SO<sub>2</sub> emissions from the Nos. 3 and 4 Power Boilers and the Nos. 1 and 2 Recovery Boilers. Based on the modeling results, we have determined that a 40 percent reduction across the board for the named emissions units is appropriate to remove the modeled NAAQS violation from your facility alone; and, it appears that the proposed reduction will provide the Department with the reasonable assurances that it would need to draft an air construction permit and go out with an Intent to Issue for publication. In addition, it seems that the suggested reductions are permit related reductions and not actual emission reductions. This value was discussed with Mr. Jim Spahr on Monday, February 9<sup>th</sup>.

The Department will resume processing this application after receipt of the above requested information, as well as a response to the previously issued incompleteness letter. If you have any questions regarding this matter, please call Bruce Mitchell at (850)413-9198 or Cleve Holladay at (850)921-8986.

Sincerely,



Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

TLV/bm

cc: Sandra Veazey, NWD  
Gregg Worley, EPA  
John Bunyak, NPS  
Ellen Porter, USF&WS  
Jim Spahr, IPC  
William V. Straub, P.E., All4 Inc.  
Bruce  
Cleve  
Trina's Reading File

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<p>1. Article Addressed to:          Ms. Nicki S. Slusser, Mill Manager          International Paper Company          Pensacola Mill          375 Muscogee Road          Cantonment, Florida 32533-0087</p>		<p>B. Received by (Printed Name) <i>DAVID J. HOWARD</i> C. Date of Delivery <i>02-13-04</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes          If YES, enter delivery address below: <input type="checkbox"/> No</p>	
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 Ms. Nicki S. Slusser, Mill Manager

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**Sent To**  
 Ms. Nicki S. Slusser, Mill Manager

Street, Apt. No.,  
 or PO Box No. 375 Muscogee Road

City, State, ZIP+4  
 Cantonment, Florida 32533-0087

PS Form 3800, January 2001 See Reverse for Instructions