

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

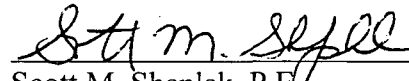
P.E. Certification Statement

Permittee:
Champion International Corporation
Pensacola Mill

DRAFT Permit No.: 0330042-004-AC
PSD-FL-200(A)
Facility ID No.: 0330042

Project type: AC/PSD Permit Modification

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).


Scott M. Sheplak, P.E.

6/1/00
date

Registration Number: 48866

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/921-9532
Fax: 850/922-6979

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

Champion International Corporation
Pensacola Mill
Facility ID No.: 0330042
Escambia County

Air Construction Permit No.: 0330042-004-AC
PSD-FL-200(A)

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

1. APPLICATION INFORMATION.

1.1. Applicant Name and Address:

Champion International Corporation
Pensacola Mill
P.O. Box 87
Cantonment, Florida 32533-0087

1.2. Reviewing and Process Schedule:

Date of Receipt of Application: 03/06/2000

2. FACILITY INFORMATION.

2.1. Facility Location

The Champion International Corporation - Pensacola Mill is located at 375 Muscogee Road, Escambia County, Florida.

The UTM: coordinates of this facility are Zone 17; 469.0 km East; 3386.0 km North.

2.2. Standard Industrial Classification Code (SIC):

Major Group No.	26	Paper and Allied Products
Group No.	261	Pulp Mills
Industry No.	2611	Pulp Mills

2.3. Facility Category

The Champion International Corporation - Pensacola Mill is classified as a major air pollutant emitting facility. This facility is on the list of the 28 Major Facility Categories, Table 62-212.400-1. This facility is classified as a Title V facility and is in the process of receiving its initial Title V operation permit.

3. PROJECT DESCRIPTION.

3.1. The permitting authority has determined that an Air Construction Permit is required in order to: 1) to allow the use of purified landfill gas from the Perdido landfill as a fuel in the No. 5 Power Boiler, which is already permitted to fire natural gas; 2) to remove some requirements that were imposed in an air construction permit related to AAC (ambient air concentrations) that are considered to be obsolete; 3) to evaluate the applicability of the General Visible Emissions Standard to the lime kiln - mud dryer system; and, 4) to evaluate the pollutants PM/PM₁₀ (particulate matter/particulate matter greater than 10 microns), VOC (volatile organic compounds) and VE (visible emissions), to see if they were appropriately regulated in the original PSD permitting action for the No. 6 Power Boiler.

The permitting authority intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of the affected emissions units will not adversely impact air quality, and the Title V source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

4. RULE APPLICABILITY.

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297.

In accordance with Rule 62-204.340(1), F.A.C., this facility is located in an area (Escambia County) designated as attainment for all pollutants. The proposed project is subject to permitting under Rule 62-212.300, F.A.C., Permits Required. The potential emissions for the burning purified landfill gas are considered to be similar to that of firing natural gas, except for the pollutant TRS, whose emissions will eventually become SO₂ emissions when oxidized upon firing them in the combustion source. Even so, the potential emissions are expected to be less than the significant emission rates established in Chapter 62-212, Table 212.400-2, F.A.C., for all pollutants.

When the potential pollutant emissions of PM/PM₁₀ from the No. 6 Power Boiler were evaluated for PSD purposes in the initial permitting project, they were less than the significant rates established in Chapter 62-212,

Table 212.400-2, F.A.C., and not subject to the NSR requirements pursuant to Rule 62-212.400(5), F.A.C. However, an emissions limitation was established for PM/PM₁₀, based on the application data submitted, even though there was, and still is, no specific emissions limiting standard for PM/PM₁₀. Therefore, the emissions limiting standards for PM/PM₁₀ will be changed to "PSD tracking type" pollutants and carry a justification of Rule 62-212.400(g), F.A.C. The VOC emission limiting standard was established through BACT and will not be changed. There will be no change in the visible emissions standard because the standards of 40 CFR 60.42(a)(2) apply; however, an "alternate procedures and requirements" (ASP) Order, No. 97-B-01, which was signed on March 17, 1997, and clerked on March 18, 1997, and the associated scrivener's error signed on July 2, 1997, and clerked on July 10, 1997, regarding boilers firing natural gas and visible emissions testing should provide some relief regarding annual testing requirements.

As for the lime kiln - mud dryer system, the General Visible Emissions Standard of less than 20% opacity cannot be removed because it is applicable because the operation generates particulate matter; and, because it is a visible emissions limiting standard, an annual performance test is required pursuant to Rule 62-297.310(7)(a)4.a., F.A.C. Because of the potential moisture interference, the owner might try to establish some sort of surrogate or ASP (alternate sampling procedure) pursuant to Rule 62-297.620, F.A.C.

The AACs [ambient air concentration(s)] established for the Chlorine Dioxide Generator were based on the Department's air toxics policy, which has been or is being replaced by the NESHAP (National Emissions Standards for Hazardous Air Pollutants) regulations promulgated under 40 CFR Part 63. Therefore, the specific conditions related (limitations and testing requirements) will be deleted.

The AACs established for the A and B Bleach Plant Lines were based on the Department's air toxics policy, which has been or is being replaced by the NESHAP (National Emissions Standards for Hazardous Air Pollutants) regulations promulgated under 40 CFR Part 63. Therefore, the specific conditions related (limitations and testing requirements) will be deleted.

The references to incorporate by reference of AO17-181738 in Specific Condition B.1., AO17-219596 in Specific Condition C.1., AO17-219600 in Specific Condition D.1., and AO17-212422 in Specific Condition E.1. of the air construction permit AC17-223343/PSD-FL-200 are still valid until they are replaced or superseded, which have not yet occurred. Therefore, no changes will be made.

5. SOURCE IMPACT ANALYSIS.

5.1. Emission Limitations:

The emission limitations that apply to natural gas firing will be the same as the firing of the landfill gas; so, there will be no change in the allowable pollutant emissions.

5.2. Control Technology Review:

There are no control technology review required.

5.3. Air Quality:

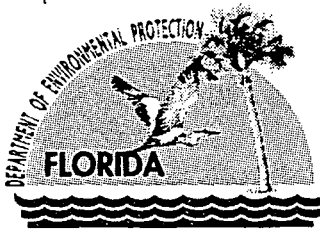
Based on the request, this proposed activity should not cause a violation of any air quality standard or increment.

6. CONCLUSION.

Based on the foregoing technical evaluation of the application submitted by Champion International Corporation - Pensacola Mill, the Department has made a preliminary determination that the proposed project will be in compliance with all applicable state and federal air pollution regulations. The General and Specific Conditions are provided in the attached draft permit conditions of approval.

Permit Engineer: Bruce Mitchell

Reviewed and Approved by Scott Sheplak, P.E.



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Permit No.: 0330042-004-AC
PSD-FL-200(A)
Facility ID No.: 0330042
SIC Nos.: 26; 2611
Expiration Date: August 31, 2003
Project: Air Construction Permit: No. 6
Power Boiler modification and permit
changes to AC17-223343/PSD-FL-200.

This permit is issued for the modification to the No. 6 Power Boiler and the operation of the Champion International Corporation - Pensacola Mill located at 375 Muscogee Road, Escambia County. UTM Coordinates: Zone 17; 469.0 km East; and, 3386.0 km North; Latitude: 30° 36' 30" North; and, Longitude: 87° 19' 13" West.

STATEMENT OF BASIS: This air construction permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

AC17-223343/PSD-FL-200
ASP No. 97-B-01 (clerked on 03/18/97)
Scriveners Error (clerked on 07/10/97)

Documents on file with the Department:

Application request and processing fee received March 6, 2000, from Mr. Jim Spahr.

Howard L. Rhodes, Director,
Division of Air Resources Management

HLR/sms/bm

"More Protection, Less Process"

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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 403.141, 403.727, or 403.859 through 403.861, F.S. 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), F.S., 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 this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment 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 F.S. and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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 reasonable times, 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 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 reasonable 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 noncompliance; and,
 - (b) The period of noncompliance, including 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. 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 F.S. or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. 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 F.S. after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120, 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.

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.

(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 five (5) years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

(c) Records of monitoring information shall include:

1. the date, exact place, and time of sampling or measurements;
2. the person responsible for performing the sampling or measurements;
3. the dates analyses were performed;
4. the person responsible for performing the analyses;
5. the analytical techniques or methods used; and,
6. 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 the 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.

[Rule 62-4.160, F.A.C.]

16. General. Air construction permit, No. AC17-223343/PSD-FL-200, is incorporated by reference except for the following changes and/or additions to the Specific Conditions; and, the numbering of each section and Specific Condition (e.g., A.2.) will be the same as it was in the original permit when it was issued for consistency purposes.

SPECIFIC CONDITIONS:

A.2. No. 6 Power Boiler.

FROM:

The No. 6 PB is permitted to fire natural gas only, with a maximum heat input of 533 MMBtu per hour, yielding a maximum steam product of 385,000 lbs/hr (2-hr average).

TO:

The No. 6 Power Boiler is permitted to fire natural and purified landfill gas only, with a maximum heat input of 533 MMBtu per hour, yielding a maximum steam product of 385,000 lbs/hr (2-hr average).
[AC17-223343/PSD-FL-200]

A.7. No. 6 Power Boiler.

FROM:

The No. 6 PB's pollutant emissions shall not exceed:

NO _x *	0.06 lb/MMBtu (32.0 lbs/hr, 140.1 TPY)
CO*	0.1 lb/MMBtu (53.3 lbs/hr, 233.5 TPY)
PM/PM ₁₀	2.67 lbs/hr, 11.7 TPY
SO ₂	Not applicable; Natural gas usage (for PSD tracking purposes: 2.2 TPY projected potential emissions)
VOC*	0.01 lb/MMBtu (5.33 lbs/hr, 23.4 TPY)
VE	≤ 20% opacity (6-min avg), except for one 6-min period/hr @ 27% opacity

* 24-hour average

TO:

The No. 6 Power Boiler's pollutant emissions shall not exceed:

NO _x *	0.06 lb/MMBtu (32.0 lbs/hr, 140.1 TPY)
CO*	0.1 lb/MMBtu (53.3 lbs/hr, 233.5 TPY)
PM/PM ₁₀	Not applicable; Natural and purified landfill gas usage (for PSD tracking purposes: 11.7 TPY projected potential emissions)
SO ₂	Not applicable; Natural and purified landfill gas usage (for PSD tracking purposes: 2.2 TPY projected potential emissions)
VOC*	0.01 lb/MMBtu (5.33 lbs/hr, 23.4 TPY)
VE	≤ 20% opacity (6-min avg), except for one 6-min period/hr @ 27% opacity

* 24-hour average

[AC17-223343/PSD-FL-200; BACT; and, Rule 62-212.400(g), F.A.C.;]

A.8. No. 6 Power Boiler.

FROM:

Any required compliance testing shall be conducted using the following test methods in accordance with F.A.C. Rule 17-297 and 40 CFR 60, Subpart Db and Appendix A (July, 1991 version).

- a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources.
- b) thru e): No change.
- f) Upon initial startup, testing shall be conducted for NO_x, CO, VOC, and VE.

Note: Other reference methods may be used with prior written approval received from the Department in accordance with F.A.C. Rule 17-297.620.

TO:

Any required compliance testing shall be conducted using the following test methods in accordance with Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A.

- a) Reserved.
- f) Reserved.

Note: Other reference methods may be used with prior written approval received from the Department in accordance with Rule 62-297.620, F.A.C.

C.1. Chlorine Dioxide (ClO₂) Generator.

FROM:

Operation permit No. AO17-219596 is incorporated by reference except for the following changes and/or additions:

- a. thru h.: No change.
- i. the pollutant emissions shall not exceed:

R8/R10 ClO₂ Generator: 37.4 TPD
Tail Gas Scrubber
Cl₂ 0.1 lb/hr, 0.44 TPY
ClO₂ 0.25 lb/hr, 1.1 TPY

- j. initial compliance testing on the Tail Gas Scrubber for chlorine and chlorine dioxide will be conducted using NCASI (EPA Method 6) test protocols.

Note: A post-test evaluation for rule applicability will be conducted to see if additional emissions evaluation is required.

TO:

Operation permit No. AO17-219596 is incorporated by reference except for the following changes and/or additions:

- i. Reserved.
- j. Reserved.

D.1. A and B Bleach Plant Lines.

FROM:

Operation permit No. AO17-219600 is incorporated by reference except for the following changes and/or additions:

- a. thru e.: No change.
- f. the pollutant emissions shall not exceed:
 - 1) A-Line Bleach Plant: 888 air dried tons per day, maximum
 - a) E_o Washer CHCl₃ 0.038 lb/hr, 0.16 TPY
 - b) A-Line Scrubber Cl₂ 1.45 lbs/hr, 6.4 TPY
ClO₂ 0.45 lb/hr, 2.0 TPY
CHCl₃ 0.34 lb/hr, 1.5 TPY

2) A-Line Bleach Plant: 830 air dried tons per day, maximum

- a) E_o Washer CHCl₃ 0.038 lb/hr, 0.16 TPY
- b) B-Line Scrubber Cl₂ 1.45 lbs/hr, 4.38 TPY
ClO₂ 0.45 lb/hr, 2.0 TPY
CHCl₃ 0.34 lb/hr, 1.5 TPY

3) A-Line and B-Line Bleach Plants: average 1500 air dried tons per calendar day, maximum combined total.

g. Did not exist.

h. after construction/modification is completed, a meeting to establish the testing protocol shall be held with the Department, at which the following information shall be provided:

- 1) identification of all sources and their associated waste streams to be evaluated;
- 2) proposed sampling procedures/methods and analysis for determining CHCl₃; and,
- 3) proposed testing dates.

Note: A post-test evaluation for rule applicability will be conducted to see if additional emissions evaluation is required.

i. after construction/modification is completed, initial compliance testing on the Bleach Plant Scrubbers (A-Line and B-Line) and E_o Washers for chlorine and chlorine dioxide will be conducted using NCASI (EPA Modified Method 6) test protocols.

Note: A post-test evaluation for rule applicability will be conducted to see if additional emissions evaluation is required.

TO:

Operation permit No. AO17-219600 is incorporated by reference except for the following changes and/or additions:

f. the maximum air dried tons per calendar day allowed to be produced are:

- 1) A-Line Bleach Plant: 888
- 2) B-Line Bleach Plant: 830
- 3) A-Line and B-Line Bleach Plants Combined Total: 1500 average

g. Reserved.

h. Reserved.

i. Reserved.