

Pensacola Mill  
375 Muscogee Road  
P.O. Box 87  
Cantonment, Florida 32533-0087  
850 968-2121

0330042-004-AC

RECEIVED

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BUREAU OF AIR REGULATION

January 13, 2000

Mr. Bruce Mitchell  
Twin Towers Office Building  
Air Resources Management  
2600 Blair Stone Road  
Tallahassee, FL  
32399-2400

Dear Mr. Mitchell:

By this letter Champion International Corporation requests certain revisions to air construction permit AC-17-223343 for the corporation's Pensacola Mill.

Per our conversation, the requested revisions apply only to the language of the air construction permit. No changes have been made to the design or method of operation of any of the affected units. The specific revisions requested are described in the enclosed document "Requested Permit Revisions to AC-17-223343". The PE certification which accompanied my previous submittal is also enclosed.

If you have any questions or require any further information please contact me at (850) 968-2121 extension 3833.

Sincerely,

A handwritten signature in cursive script that reads 'Jim Spahr'.

Jim Spahr  
Environmental Engineer

Enclosures:     1 - Requested Permit Revisions to AC-17-223343  
                  1 - MSDS for "Landfill Gas"  
                  1 - Check #038646 for \$1250.00 for application fee  
                  4 - Responsible Official Statement and PE Certification

## Requested Permit Revisions to AC-17-223343

- **Section A. No. 6 Power Boiler**

Champion requests that Specific Conditions, Section A. No. 6 Power Boiler, condition 2. be modified to read as follows:

“2. The No. 6 PB is permitted to fire natural gas *and purified landfill* gas only,…”

This would accurately reflect the fact the this unit burns purified landfill gas as well as natural gas. A material safety data sheet for the landfill gas is attached for your review.

Champion requests that Specific Conditions, Section A. No. 6 Power Boiler, condition 7. Be modified as follows:

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

NO <sub>x</sub> *	0.06 lb/MMBtu (32.0 lbs/hr, 140.1 TPY)
CO *	0.1 lb/MMBtu (53.3lbs/hr, 233.5 TPY)
<del>PM/PM<sub>10</sub></del>	<del>2.67 lbs/hr, 11.7 TPY</del>
SO <sub>2</sub>	Not Applicable: Natural Gas Usage (for PSD tracking purposes: 2.2 TPY projected potential emissions)
<del>VOC *</del>	<del>0.01 lb/MMBtu (5.33 lbs/hr, 23.4 TPY)</del>
<del>VE</del>	<del>≤ 20 % opacity (6 min avg), except for one 6 min period/hr @ ≤ 27% opacity</del>

\* 24-hour average

This emitting unit burns only natural gas and purified landfill gas. VOC, Visible emissions and emissions of PM/PM<sub>10</sub> are not relevant to this emitting unit.

Champion further requests that the references to the corresponding test methods in Section A. conditions 8. a), c) & e) also be removed from the permit.

- **Section B. Lime Kiln - Mud Dryer System**

Specific Conditions, Section B. Lime Kiln - Mud Dryer System, condition 1. incorporates operation permit No. AO 17-181738 by reference. This permit will be superseded by the Title V Air Operating Permit. Champion requests that this reference be removed from the permit.

Specific Conditions, Section B. Lime Kiln - Mud Dryer System, condition 1. g. currently contains a VE limit of < 20% opacity. This unit utilizes a wet scrubber for SO<sub>2</sub> control. Consequently a significant attached steam plume is always associated with this source, making VE testing difficult and unreliable at best. Furthermore the unit is subject to a stringent PM/PM<sub>10</sub> limit and annual PM testing which ensures minimal visible emissions. Therefore Champion requests that the VE limit be removed from this emitting unit.

Champion further requests that the reference to the corresponding test method in Section B., condition 1. h) 4) also be removed from the permit.

- **Section C. Chlorine Dioxide (ClO<sub>2</sub>) Generator**

Specific Conditions, Section C. Chlorine Dioxide (ClO<sub>2</sub>) Generator condition 1. incorporates operation permit No. AO 17-219596 by reference. This permit will be superseded by the Title V Air Operating Permit. Champion requests that this reference be removed from the permit.

Specific Conditions, Section C. Chlorine Dioxide (ClO<sub>2</sub>) Generator condition 1. i. & j. contain emissions limits and initial compliance test requirements for chlorine and chlorine dioxide. These conditions are based on the FDEP's air toxics policy. Champion requests that these conditions be removed from the permit.

• **Section D. A and B Bleach Plant Lines**

Specific Conditions, Section D. A and B Bleach Plant Lines condition 1. incorporates operation permit No. AO 17-219600 by reference. This permit will be superseded by the Title V Air Operating Permit. Champion requests that this reference be removed from the permit.

Champion requests that Specific Conditions, Section D. A and B Bleach Plant Lines, conditions f. through h. be modified as follows:

f) ~~The pollutant emissions shall not exceed:~~

1) ~~A Line bleach Plant:~~

a. ~~E<sub>6</sub> washer Chloroform, CHCl<sub>3</sub> 0.038 lb/hr, 0.16 TPY~~

b. ~~A Line Scrubber Chlorine, Cl<sub>2</sub> 1.45 lbs/hr, 6.4 TPY  
Chlorine Dioxide, ClO<sub>2</sub> 0.45 lbs/hr, 2.0 TPY  
Chloroform, CHCl<sub>3</sub> 0.34 lb/hr, 1.5 TPY~~

2) ~~B Line Bleach Plant:~~

a. ~~E<sub>6</sub> washer Chloroform, CHCl<sub>3</sub> 0.038 lb/hr, 0.16 TPY~~

b. ~~A Line Scrubber Chlorine, Cl<sub>2</sub> 1.0 lbs/hr, 4.38 TPY  
Chlorine Dioxide, ClO<sub>2</sub> 0.45 lbs/hr, 2.0 TPY  
Chloroform, CHCl<sub>3</sub> 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~~

Maximum emission limits and testing requirements will be determined at the time of required compliance with the Maximum Achievable Control Technology Standards set forth in CFR 63.445 Standards for Bleaching Systems.

Chlorine and Chlorine Dioxide emissions are controlled by a closed vent system and routed to a white liquor scrubber for control. The requirements of CFR 63.450 Standards for Enclosures and Closed Vent Systems will be met at the time of required compliance with CFR 63.445 Standards for Bleaching Systems.

Chloroform emissions are controlled as set forth by CFR 63.445(d)(2). Bleaching is accomplished by using chlorine dioxide only. No hypochlorite or chlorine is used for bleaching in this system.

~~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  $\text{CHCl}_3$ ; and,~~
- ~~3) proposed testing dates.~~

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

The requirements of CFR 63.453 Monitoring Requirements (a) and (c) will be met at the time of required compliance with CFR 63.445 Standards for Bleaching Systems. Until such time, compliance with emission standards shall continue to be verified by surrogate parameter control of the scrubber white liquor pH to a minimum of 10.0. Records of the scrubber white liquor pH recorded once per operator shift shall be maintained and be available for inspection by the Department.

These changes reflect the fact that the Pensacola Mill's Bleaching System exceeds the requirements of the Maximum Achievable Control Technology (MACT I) standards under the "cluster rules". The Department has stated that it would consider compliance with MACT I as compliance with its HAPS and air toxics policy.

- **Section E. Nos. 1 and 2 Multiple Effect Evaporator (MEE) Sets, Batch and Continuous Digester Systems, and Foul Condensate Steam Stripper System**

Specific Conditions, Section E. Nos. 1 and 2 Multiple Effect Evaporator (MEE) Sets, Batch and Continuous Digester Systems, and Foul Condensate Steam Stripper System, condition 1. incorporates operation permit No. AO 17-212422 by reference. This permit will be superseded by the Title V Air Operating Permit. Champion requests that this reference be removed from the permit.



4. Professional Engineer Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

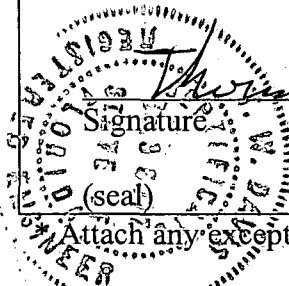
*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [ ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ✓ ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*



*M. Davis*

*1/8/00*

Attach any exception to certification statement.

**Certification pertains to requested permit revisions to Permit No. AC17-223343.**

# MATERIAL SAFETY DATA SHEET (MSDS)

## SECTION I

TRADE NAME LANDFILL GAS EMERGENCY CONTACT Tim Johnson  
EMERGENCY TELEPHONE NUMBER (888) 944-8797  
CHEMICAL NAME AND SYNONYMS N/A - MIXTURE  
LANDFILL NAME Perdido Landfill TELEPHONE NUMBER (850) 937-1055  
ADDRESS 13009 Beulah Road  
CITY Cantonment STATE Florida ZIP CODE 32533

## SECTION II - HAZARDOUS INGREDIENTS

	%	TLV	PEL	UNITS
METHANE	45 -60	A*	NE	N/A
CARBON DIOXIDE	35 -50	5000	5000	PPM
NITROGEN	0 - 15	NE	NE	N/A
OXYGEN	0 - 5	NE	NE	N/A
ETHANE	<0.18	A*	NE	N/A
HYDROGEN SULFIDE	TRACE	10	20**	PPM

\* CLASSIFIED AS A "SIMPLE ASPHYXIANT"

\*\* CEILING CONCENTRATION

LANDFILL GAS MAY ALSO CONTAIN TRACE QUANTITIES  
(<0.1%) OF VARIOUS ORGANIC GASES NOT LISTED ABOVE.  
ABSOLUTE CONCENTRATION VARY BY SITE.

## SECTION III - PHYSICAL DATA

BOILING POINT (F) LESS THAN 109 DEGREES SPECIFIC GRAVITY (WATER = 1) N/A  
VAPOR PRESSURE (mm Hg) NE PERCENT VOLATILE BY VOLUME (%) 100  
VAPOR DENSITY (AIR = 1) 0.98 (average) pH N/A  
SOLUBILITY IN WATER APPRECIABLE EVAPORATION RATE N/A  
APPEARANCE AND ODOR COLORLESS GAS; CHARACTERISTIC ODOR

## SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (F) LESS THAN 0 DEGREES FLAMMABLE LIMITS LEL 5% UEL 15%  
EXTINGUISHING MEDIA CARBON DIOXIDE OR DRY CHEMICAL  
SPECIAL FIRE FIGHTING PROCEDURES USE WATER SPRAY OR FOG TO COOL FIRE-EXPOSED CONTAINERS  
UNUSUAL FIRE & EXPLOSION HAZARDS MAY REIGNITE EXPLOSIVELY IF FIRE IS EXTINGUISHED BEFORE STOPPING LEAK

N/A - NOT APPLICABLE

NE - NOT ESTABLISHED

UN - UNAVAILABLE

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**SECTION V - HEALTH HAZARD INFORMATION**

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**SYMPTOMS/EFFECTS OF OVEREXPOSURE** ASPHYZANT. GAS REDUCES OXYGEN AVAILABLE FOR BREATHING. EARLY SYMPTOMS INCLUDE HEADACHE AND DIZZINESS. SEVERE OVEREXPOSURE CAN LEAD TO LOSS OF CONSCIOUSNESS AND DEATH.

**FIRST AID**

**EYE** N/A                      **SKIN** N/A

**INHALATION** MOVE VICTIM TO FRESH AIR AND RESTORE BREATHING. OBTAIN PROMPT MEDICAL ATTENTION. STAY WITH VICTIM UNTIL ARRIVAL OF EMERGENCY MEDICAL PERSONNEL. (RESCUER MUST WEAR SELF-CONTAINED BREATHING APPARATUS).

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**SECTION VI - REACTIVITY DATA**

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**STABILITY** NORMALLY STABLE. AVOID HEAT, SPARKS AND OPEN FLAME.

**INCOMPATIBLE MATERIALS** OXIDIZERS

**HAZARDOUS DECOMPOSITION PRODUCTS** COMBUSTION MAY PRODUCE CARBON MONOXIDE, CARBON DIOXIDE, ETHYLENE, AND ACETYLENE.

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**SECTION VII - SPILL OR LEAK PROCEDURES**

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**PROCEDURES** EVACUATE AREA. WEAR SELF-CONTAINED BREATHING APPARATUS IN NON-ROUTINE SITUATIONS.

**WASTE DISPOSAL METHOD** DISPOSE OF BY BURNING THROUGH A FLARE STACK, IN ACCORDANCE WITH FEDERAL, STATE, AND LOCAL REGULATIONS.

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**SECTION VIII - SPECIAL PROTECTION INFORMATION**

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**RESPIRATORY** WEAR A NIOSH APPROVED SELF-CONTAINED BREATHING APPARATUS IN NON-ROUTINE SITUATIONS.

**EYEWEAR** NOT NORMALLY REQUIRED. SAFETY GLASSES MAY BE REQUIRED BY SITE POLICY.

**CLOTHING/GLOVES** N/A

**VENTILATION** LOCAL EXHAUST MAY BE NECESSARY UNDER SOME HANDLING/USE CONDITIONS. SPECIFIC NEEDS SHOULD BE ADDRESSED BY SUPERVISORY OR HEALTH/SAFETY PERSONNEL.

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**SECTION X - SPECIAL PRECAUTIONS**

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FLAMMABLE GAS. GROUND ALL LINES AND EQUIPMENT USED WITH GAS TO PREVENT STATIC SPARKS. DO NOT SMOKE WHERE GAS IS USED OR STORED. A 19.5% OXYGEN CONCENTRATION IN AIR IS THE MINIMUM RECOMMENDED FOR WORKING WITHOUT SPECIAL BREATHING EQUIPMENT. THIS PRODUCT DOES NOT CONTAIN ANY CARCINOGENS (AT 0.1% OR GREATER) AS DEFINED BY IARC, NTP, OR OSHA.

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