

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Mr. J. Todd Crutcher
 Operations Manager & Responsible
 Official
 International Paper Company
 Pensacola Mill
 375 Muscogee Road
 Cantonment, Florida 32533-0087

2. Article Number
 (Transfer from service label) 7000 2870 0000 7028 1167

PS Form 3811, August 2001

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee
 B. Received by (Printed Name) C. Date of Delivery
 Andrew C. Simmons 6-17-03
 D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

Domestic Return Receipt

102595-02-M-1540

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)**

7000 2870 0000 7028 1167

OFFICIAL USE
 Mr. J. Todd Crutcher

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
 Here

Sent To
 Mr. J. Todd Crutcher
 Street, Apt. No.; or PO Box No.
 375 Muscogee Road
 City, State, ZIP+4
 Cantonment, Florida 32533-0087

PS Form 3800, May 2000

See Reverse for Instructions

Published Daily-Pensacola, Escambia County, FL

STATE OF FLORIDA
County of Escambia

Before the undersigned authority personally appeared NIKKI WINDHAM who is personally known to me and who on oath says that he/she is a representative of The Pensacola News Journal, a daily newspaper published in Pensacola in Escambia County, Florida; that the attached copy of advertisement, being a legal in the matter of **NOTICE OF INTENT** was published in said newspaper in the issues **JULY 1, 2003**. Affidavit further says that the said Pensacola News Journal is a newspaper published in Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and Affidavit further says that he/she has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this **1ST DAY OF JULY A.D., 2003**.



Notary Public

BERETH FERGUSON
"Notary Public-State of FL"
My Comm. Expires OCT. 10, 2005
Comm. No. DD048662

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Permit No.: 0330042-007-AC

International Paper Company
Pensacola Mill
Escambia County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit to International Paper Company - Pensacola Mill for the installation of a new causticizer body and associated piping, the installation of "diagonal" extraction screens in the continuous digester for improved downflow cooking, and the replacement of two (2) medium consistency pumps in the Pine O2 Delignification and Bleach Plant area at the existing mill located at 375 Muscogee Road, Escambia County. The applicant's name and address are: International Paper Company, 375 Muscogee Road, Cantonment, Florida 32533-0087. A Best Available Control Technology was not required pursuant to Rule 62-212.400, Florida Administrative Code (F.A.C.), and 40 CFR 52.21, Prevention of Significant Deterioration (PSD).

Actual production limitations are being established to effect no changes in actual emissions and are based on calendar years 1998 and 1999. Therefore, an air quality impact analysis was not required because there were no significant increases in any pollutant emissions; and, this permitting action will not contribute to or cause a violation of any state or federal ambient air quality standards or increment.

The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue An Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the permitting authority shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.), before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- The name and address of each agency affected and each agency's file or identification number, if known;
- The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;
- A statement of how and when the petitioner received notice of the agency action or proposed action;
- A statement of all disputed issues of material fact. If there are none, the petition must so state;
- A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; and
- A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours; 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District:
Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8096

The complete project file includes the Technical Evaluation and Preliminary Determination, the Draft Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.

Legal No. 65199 1T July 1, 2003

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1. Article Addressed to:

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

2. Article Number

(Transfer from service label) 7000 2870 0000 7028 1334

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *David J. Howard* Agent
 Addressee

B. Received by (Printed Name)

DAVID J. HOWARD

C. Date of Delivery

7/24/03

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
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4. Restricted Delivery? (Extra Fee)

Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 2870 0000 7028 1334
OFFICIAL USE
 Ms. Nicki Slusser, Mill Manager

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
 Here

Sent To

Ms. Nicki Slusser, Mill Manager

Street, Apt. No.; or PO Box No.

375 Muscogee Road

City, State, ZIP+4

Cantonment, Florida 32533

PS Form 3800, May 2000

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Mr. Nicki Slusser
 Mill Manager & Responsible
 Official
 International Paper Company
 Pensacola Mill
 375 Muscogee Road
 Cantonment, Florida 32533-0087

2. Article Number
 (Transfer from service label)

7000 1670 0013 3109 8833

PS Form 3811, August 2000

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 X *[Signature]* Agent
 Addressee

B. Received by (Printed Name)
ALBERT C SIMMONS

C. Date of Delivery
1-19-05

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

102595-02-M-1540

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)**

OFFICIAL USE

7000 1670 0013 3109 8833

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
 Here

Sent to
 Mr. Nicki Slusser, Mill Manager
 International Paper Company
 Street, Apt. No., or P.O. Box No.
 375 Muscogee Road
 City, State, ZIP+4
 Cantonment, Florida 32533-0087

PS Form 3800, May 2000

See Reverse for Instructions



PENSACOLA MILL
375 MUSCOGEE ROAD
PO BOX 87
CANTONMENT FL 32533-0087

March 30, 2006

RECEIVED

MAR 31 2006

BUREAU OF AIR REGULATION

Ms. Trina Vielhauer
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Tower Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Clarification of Information for Surrender of Air Construction Permit No. 0330042-007-AC for the International Paper Company (IP) Pensacola, FL Mill

Dear Ms. Vielhauer:

On March 17, 2006, International Paper Company (IP) received correspondence from the Florida Department of Environmental Protection (DEP) confirming the surrender of Florida Air Construction Permit No. 0330042-007-AC, and the withdrawal of Florida Air Construction Permit No. 0330042-008-AC. IP would like to correct a misstatement in the paragraph which pertains to the surrender of Permit No. 0330042-007-AC.

This paragraph incorrectly states that "Only the following parts of the project were completed: replacement of existing Kamyrr extraction screens with diagonal extraction screens; replacement of the causticizer body; and the replacement of two medium consistency pumps in the O2 delignification and bleach plant area". As described in a letter to the department dated February 28, 2006, only the replacement of the extraction screens was done. The causticizer body and the medium consistency pumps were never replaced.

Should you require additional information, please contact me at 850-968-4275.

Sincerely,

A handwritten signature in cursive script that reads "Mary Conatser".

Mary B. Conatser



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

March 17, 2006

CERTIFIED MAIL - Return Receipt Requested

Mr. Christopher Read, Mill Manager
International Paper Company
Pensacola Mill
375 Muscogee Road
Cantonment, Florida 32533-0087

Re: International Paper Company - Pensacola Mill
Surrender of Permit No. 0330042-007-AC
Withdrawal of Air Permit Application No. 0330042-008-AC (PSD-FL-335)

Dear Mr. Read:

On November 15, 2005, the Department received a letter from the International Paper Company (IPC) regarding the "withdrawal" of Permit No. 0330042-007-AC and the withdrawal of air construction permit Application No. 0330042-008-AC (PSD-FL-335). On January 23, 2006, the Department requested additional information and clarification. On March 1, 2006, the Department received a letter from Ms. Mary B. Conatser (IPC) providing additional details. The following is the Department's response.

1. Withdrawal of Air Permit Application No. 0330042-008-AC (PSD-FL-335): The purpose of this project was to increase production. The application is pending and a permit was never issued. IPC indicates that it has changed its plans and this project is no longer being pursued. New plans are identified in IPC's application submitted to the Department's Northwest District office on February 24, 2006. The proposed project identifies substantial changes to the plant including a decrease in the production of bleached pulp and the processing of mostly softwoods. The application will establish past actual emissions in accordance with the Department's new regulations. The Department accepts your withdrawal of Application No. 0330042-008-AC (PSD-FL-335) for an air permit. It will be terminated in our permit tracking system and deemed "withdrawn" on the date of receipt of Ms. Conatser's letter (March 1, 2006).
2. Surrender of Permit No. 0330042-007-AC: This permit was issued on July 23, 2003 with an expiration date of April 30, 2007. Once a permit is issued, it cannot be "withdrawn"; but it can be surrendered. The primary purpose of this project was to establish baseline actual emissions prior to Project No. 0330042-008-AC (PSD-FL-335) while authorizing some component replacements. Only the following parts of this project were completed: replacement of existing Kamyr extraction screens with diagonal extraction screens; replacement of the causticizer body; and the replacement of two medium consistency pumps in the O₂ delignification and bleach plant area. IPC maintains that the component replacements did not increase production capacity and indicates that the remaining work will not be completed. In consideration of withdrawn Application No. 0330042-008-AC (PSD-FL-335) as well as the new project under review by the Department's Northwest District, the Department accepts your surrender of this permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14)

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days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

If you have any questions regarding this matter, please call Bruce Mitchell at 850/413-9198 or Jeff Koerner at 850/921-9536 or write to me at the above letterhead address.

Sincerely,



Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/bm/jfk

cc: Sandra Veazey, NWD
John Bunyak, NPS
Kyle Moore, IPC

Gregg Worley, EPA Region 4
Ellen Porter, USF&WS
William V. Straub, P.E., All4 Inc.



RECEIVED
PENSACOLA MILL
375 MUSCOGEE ROAD
PO BOX 87
CANTONMENT FL 32533-0087

February 28, 2006

MAR 01 2006

BUREAU OF AIR REGULATION

Ms. Trina Vielhauer
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Tower Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Supporting Information for Withdrawal of Air Construction Permit No. 0330042-007-AC for the International Paper Company (IP) Pensacola, FL Mill

Dear Ms. Vielhauer

On January 23, 2006, International Paper Company (IP) received correspondence from the Florida Department of Environmental Protection (DEP) concerning the status of two permitting projects at the Pensacola Mill and the withdrawal of Florida Air Construction Permit No. 0330042-007-AC. The following information has been prepared to address the questions contained in the January 23 correspondence.

In early 2003, IP held discussions with Florida DEP to review a proposed project at the Pensacola Mill that would simultaneously address several objectives, increase pulp quality, increase energy efficiency and create a 150 ton per day pulping increase capability. The proposed project would occur in two phases, activities associated with the first phase of the project were required to be undertaken in advance of the second phase of the project. IP submitted a construction permit application in April 2003 to propose "Phase I" of the project. Activities proposed under Phase I included;

- Replace the existing Kamyr extraction screens with diagonal extraction screens to improve the quality of softwood pulp from the Kamyr digester;
- Install a new causticizer body and related piping; and
- Replace two medium consistency (MC) pumps in the softwood O₂ Delignification and Bleach Plant area.

Of the three components to the Phase I project, only the installation of a new causticizer body and the replacement of the two MC pumps in the softwood (A-Line) O₂ Delignification and Bleach Plant area were directly linked to the 150 tpd pulping increase. The replacement of the extraction screens was done to improve pulping quality and reduce energy usage. The Mill proposed to maintain pulping production levels at baseline levels until the second phase "Phase II" of the project was initiated.

Phase II of the project proposed changes to recovery operations, lime kiln/lime mud dryer system, bleaching and brown stock washing operations. The 150 tpd pulping increase would be realized after completion of Phases I and II of the project. The Mill submitted the Phase II Prevention of Significant Deterioration (PSD) project in July 2003.

On July 23, 2003 Florida DEP issued Air Construction Permit No. 0330042-007-AC for Phase I activities of the project. However, before implementing Phase I changes, the Mill reconsidered Phase II activities and ultimately decided to abandon the overall project. This decision meant that Phase I activities were unnecessary since the projected 150 tpd pulping increase would not occur. Of the three components of the Phase I project, only the installation of diagonal extraction screens was performed. This replacement of the Kamyr extraction screens with diagonal extraction screens was unrelated to the pulping increase. The benefits of the diagonal extraction screens are improved quality and reduced energy consumption, not an increased Kamyr pulping capacity or pulping rate.

The replacement of the straight extraction screens took place in November 2003. The maximum monthly softwood pulping production was essentially unchanged. A summary of the monthly pulping totals for the 1999 thru 2005 (pre- and post-screen replacement) is provided in Table 1. The table shows that the maximum monthly softwood pulping rate occurred in January 1999, indicating that with straight extraction screens, the Kamyr digester was capable of achieving high pulping rates comparable to pulping levels with diagonal screens. Any difference in the annual softwood pulping levels after the November 2003 installation of the diagonal screens is a reflection of improving market conditions, the shutdown of the No. 3 Paper Machine, improvement of overall Mill reliability, and a single Mill outage in 2005 rather than the normal two annual outages. Emissions would be unchanged by the replacement of the extraction screens.

It should be noted that the emissions from the Kamyr digester are collected by the Mill's low volume high concentration (LVHC) system and controlled by the Mill's Thermal Oxidizer. The emissions generated by the Kamyr Digester include total reduced sulfur (TRS) compounds and volatile organic compounds (VOC) and methanol. The Mill's Thermal Oxidizer is highly efficient for the control of VOC, TRS and methanol.

As detailed in IP's November 8, 2005 letter to Florida DEP, IP believes that Air Construction Permit 0330042-007-AC and pending project No. 0330042-008-AC/PSD-FL-335 should be withdrawn. None of the activities that would increase emissions or production have been or will be performed. Further, the replacement of the straight slotted screens with diagonal screens would have been, by itself, exempt from permitting per

Florida Administrative Code 62-4.040. The screens replacement was included as part of Air Construction Permit 0330042-007-AC for completeness purposes only.

Should you require additional information, please contact me at 850-968-4275.

Sincerely,

A handwritten signature in cursive script that reads "Mary Conatser".

Mary B. Conatser

**International Paper Pensacola Mill
Pensacola, FL**

Year	1999	2000	2001	2002	2003	2004	2005
Month	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)
January	26,352	22,277	17,755	19,389	22,610	24,057	25,287
February	22,632	20,685	16,701	17,997	21,083	18,375	23,709
March	24,827	22,429	20,088	12,221	19,840	19,080	24,155
April	22,974	20,670	20,960	23,965	23,277	23,996	21,649
May	24,734	24,671	21,077	20,575	24,128	24,781	24,766
June	23,178	23,609	20,865	23,149	22,473	24,753	23,290
July	23,707	24,340	19,900	23,808	23,588	24,988	23,412
August	23,318	24,884	21,208	22,430	22,558	25,220	24,586
September	21,169	16,612	21,473	23,457	24,036	18,857	23,868
October	19,784	13,004	16,496	18,985	20,105	24,812	25,698
November	24,457	20,038	21,148	17,011	18,978	24,118	24,849
December	24,087	17,496	19,824	25,148	24,216	17,466	25,908
Annual Total:	281,219	250,715	237,495	248,135	266,892	270,503	291,177



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

January 23, 2006

CERTIFIED MAIL - Return Receipt Requested

Mr. Joel Bolduc
Environmental Supervisor
International Paper
Pensacola Mill
375 Muscogee Road
Cantonment, Florida 32533-0087

Re: Air Permit No.: 0330042-007-AC
International Paper - Pensacola Mill

Dear Mr. Bolduc:

On November 15, 2005, the Department received your letter dated November 10, 2005, from our Northwest District office, which requested withdrawal of the above referenced air construction permit (AC) and reversion back to the conditions established in the most current Title V permit, No. 0330042-009-AV. In the letter, you acknowledged completing some of the work authorized in the AC. Before we can make any conclusion, please provide the following information:

1. In detail, describe exactly what work has been completed as authorized by the AC.
2. Explain how the work that was performed affected the operation of the emissions unit.
3. Did the change affect any pollutant emissions? If so, which pollutants were affected and by how much?
4. Describe the original purpose and intent of Project No. 0330042-007-AC as well as pending Project No. 0330042-008-AC/PSD-FL-335. What is your plan for pending Project No. 0330042-008-AC/PSD-FL-335?

I look forward to your response. If you have any questions regarding this matter, please call Bruce Mitchell at 850/413-9198 or Jeff Koerner at 850/921-9536 or write to me at the above letterhead address.

Sincerely,

Ms. Trina L. Vielhauer
Chief
Bureau of Air Regulation

cc: Ms. Sandra Veazey, NWD

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1/6/06

Jeff,

We issued an AC, No. 0330042-007-AC, to International Paper to establish various mill operations's capacities in order to allow some physical changes to be made, but avoid PSD NSR scrutiny during Phase I of the mill's planned modification to increase production by 150 ADTP/day. The original AC was issued on 07/23/2003, with an expiration date of 04/30/05. The expiration date was extended, by request, to 04/30/07.

The permit authorized the following:

1. modification to the Kamyr Digester (continuous digester) – replacement of the existing straight-slotted extraction screens with diagonal-slotted extraction screens:

The replacement screens were installed at the wash section in the digester and designed to improve washing at the bottom of the digester. The mill claims that the replacement extraction screens did not increase pulping capacity or pulping rate, but only improved pulp quality and reduced energy consumption.

2. addition of a new causticizer with piping to the causticizing/lime production operations;

3. installation of two (2) medium consistency pumps for the pine O2 Delignification and Bleach Plant area.

The permit restricted the following processes/operations:

1. Kamyr (continuous) Digester System: production shall not exceed 271,985 ADTBP/yr nor 293,744 ADTUP/yr;

2. Causticizing Operations – lime production shall not exceed 155,108 tons CaO/yr;

3. Pine O2 Delignification and Bleach Plant:

A-Line (softwood): bleach plant production shall not exceed 245,030 ODP/yr;

B-Line (hardwood): bleach plant production shall not exceed 239,677 ODP/yr.

4. Batch Digester System – production shall not exceed 266,042 ADTBP/yr.

5. Recovery Boiler Operations (Nos. 1 and 2) – BLS firing shall not exceed 941,560 TPY.

ADTP: air dried tons pulp;

ADTBP: air dried tons bleached pulp;

ADTUP: air dried tons unbleached pulp;

ODP: oven dried pulp;

BLS: black liquor solids.

A letter from IP was received by the NWD on November 14, 2005, stating that they never undertook any work necessary to achieve any pulping increases nor do they plan to do so; and, they are requesting that AC permit, No. 0330042-007-AC, be terminated. They do acknowledge that the extraction replacement screens were done. Based on this and the mill's change in plans to alter their product lines, IP is requesting an interpretation that the AC is no longer valid and the mill can revert back to the conditions and limitations contained in their current Title V permit.

Bruce



Jeb Bush
Governor

Department of Environmental Protection

Northwest District
160 Government Center
Pensacola, Florida 32501-5794

Colleen Castille
Secretary

FAX TRANSMITTAL FORM

TO: Bruce Mitchell

DARM -- Permitting North

FAX #: 850/9226979 or SC 292-6979

DATE: 11/15/05

FROM: Kevin White
FDEP Northwest District Air Program

PHONE: 850/595-8364, extension 1226
Fax 850/595-8096

Following is a request from International Paper we received on the 14th requesting to withdrawal construction permit 0330042-007-AC. We recognized that this AC permit was issued by you and therefore wanted to get your input on their request.

Number of pages including transmittal: 3

Faxed by: K. White



PENSACOLA MILL
375 MUSCOGEE ROAD
PO BOX 87
CANTONMENT FL 32533-0087
PHONE 850 968 2121

November 10, 2005

Mr. Rick Bradburn
Florida Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, FL 32502-5794

RECEIVED

NOV 14 2005

NORTHWEST FLORIDA
DEP

Re: Withdrawal of Construction Permit 0330042-007-AC

Dear Rick:

This letter is a follow-up to our conversations on November 4 and November 7, 2005 regarding the status of Florida Department of Environmental Protection (DEP) Air Construction Permit Number 0330042-007-AC for the International Paper Pensacola Mill. The Construction Permit was part of a two-phased project to increase pulp production at the Mill by 150 air-dried tons of pulp (ADTP) per day. The Pensacola Mill submitted permit applications for the first and second phases of the project. In 2003, DEP issued air construction Permit Number 0330042-007-AC for Phase I of the project with an expiration date of April 30, 2005. On January 6, 2005, the DEP, at the Mill's request, granted an extension of the expiration date from April 30, 2005 to April 30, 2007.

The Mill never undertook the work necessary to achieve the proposed pulping increase nor does the Mill have plans to implement the proposed changes in the future.

As you are aware, the mill is now pursuing permitting to allow the mill to be converted primarily to a brown mill. That permitting is being handled separately. The purpose of this letter is to withdraw and terminate air construction permit 0330042-007-AC effectively immediately since the mill no longer intends to implement the proposed changes associated with the pulping increase. With the permit withdrawal, the Mill's understanding is that the conditions of the construction permit are no longer applicable and the Mill is subject to the requirements in the current Title V permit.

Although none of changes required to increase pulping production were undertaken, the Mill did make an equipment upgrade on the softwood Kamyr digester. The equipment upgrade, which is similar to what was described as part of the Phase I activities in the construction permit application, included the replacement of straight-slotted screens with diagonal slotted screens. The diagonal slotted screens were installed at the wash section in the digester and designed to improve washing at the bottom of the digester. Installation of the diagonal slotted screens did

not increase the pulping capacity or pulping rate of the Kamyr digester. The benefits of the replacement are improved pulp quality and reduced energy consumption.

If you have any questions concerning the information contained in this letter or would like to discuss this matter in more detail, please contact me at 850-968-3081.

Sincerely,



Joel Bolduc
Environmental Supervisor

RECEIVED
NOV 14 2005
NORTHWEST FLORIDA
DEP

Florida Department of Environmental Protection

Memorandum

TO: Michael G. Cooke, Division of Air Resource Management

THRU: Trina Vielhauer, Bureau of Air Regulation *TV*
Jim Pennington, Air Permitting North *JMP*

FROM: Bruce Mitchell *BM*

DATE: January 5, 2005

SUBJECT: Extension of Air Construction Permit Expiration Date
International Paper Company
Pensacola Mill
Air Permit No. 0330042-007-AC

Attached for your approval and signature is a permit modification that extends the permit expiration date for the above referenced project.

Day 16 is January 5, 2005. I recommend your approval and signature.

Attachments

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery AUBREY C SIMMONS 1-19-05</p>
<p>1. Article Addressed to: Mr. Nicki Slusser Mill Manager & Responsible Official International Paper Company Pensacola Mill 375 Muscogee Road Cantonment, Florida 32533-0087</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label) 7000 1670 0013 3109 8833</p>	<p>PS Form 3811, August 200 102595-02-M-1540</p>

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only, No Insurance Coverage Provided)

7000 1670 0013 3109 8833

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent to **Mr. Nicki Slusser, Mill Manager**
International Paper Company
375 Muscogee Road
Cantonment, Florida 32533-0087

PS Form 3800, May 2000 See Reverse for Instructions



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

January 6, 2005

CERTIFIED MAIL - Return Receipt Requested

Mr. Nicki Slusser
Mill Manager & Responsible Official
International Paper Company
Pensacola Mill
375 Muscogee Road
Cantonment, Florida 32533-0087

Re: Extension of Air Construction Permit Expiration Date
International Paper Company - Pensacola Mill
Air Permit No.: 0330042-007-AC

Dear Ms. Slusser:

On December 20, 2004, the International Paper Company requested an extension of the expiration date of air construction Permit No. 0330042-007-AC for the Pensacola Mill located at 375 Muscogee Road, Escambia County, Florida. International Paper Company requests the additional time to complete construction, perform any required tests, and submit a timely Title V operation permit application. The Department approves this request.

Determination: The modification to the Kamyr digester has been completed, but the installation of the new causticizer with associated piping and the two new medium consistency pumps have been postponed until 2006. The expiration date is hereby extended from **April 30, 2005**, to **April 30, 2007**, to provide the necessary time to complete construction, perform any required tests, and submit a timely Title V operation permit application. This permitting action does not authorize any new construction. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

"More Protection, Less Process"

Printed on recycled paper.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.


Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, 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 must be filed within thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Michael G. Cooke, Director
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail or sent by e-mail before the close of business on 1/18/05 to the persons listed:

Ms. Nicki Slusser *, Mill Manager and R.O., 375 Muscogee Road, Cantonment, Florida 32533-0087
Jim Spahr, IPC
Mr. Daniel B. Smith, P.E., CE
Ms. Sandra Veazey, NED

Clerk Stamp

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

Mary J. Anthony (Clerk) 1/18/05 (Date)



PENSACOLA MILL
375 MUSCOGEE ROAD
PO BOX 87
CANTONMENT, FL 32533-0087
PHONE: 850.968.2121

RECEIVED
DEC 20 2004
BUREAU OF AIR REGULATIO

December 14, 2004

Ms. Sandra Veazey
Florida Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, FL
32501-5794

RE: Request for Extension of Expiration Date for Air Construction Permit No. 0330042-007-AC

Dear Ms. Veazey:

International Paper's (IP) Pensacola Mill has been issued the non-PSD Air Construction Permit referenced above. This permit covers Phase I of a two-phase production increase project. Air dispersion modeling conducted for the Phase II PSD Air Construction Permit Application showed ambient air quality problems resulting from Gulf Power's Crist Plant emissions. The permitting process for IP's Phase II AC Permit Application was put on hold pending Gulf Power's resolution of these issues.

Because of this delay, IP has not completed all of the projects associated with the Phase I AC Permit. The physical modification of the Kamyrdigester System has been completed. However, the installation of the new causticizer with associated piping and the two medium consistency pumps has been postponed until 2006.

International Paper hereby requests a two-year extension of the expiration date for Air Construction Permit No. 0330042-007-AC to April 30, 2007.

If you have any questions please contact Jim Spahr at 850.968.2121 x3833.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nicki Slusser".

Nicki Slusser
Mill Manager

Cc: Bruce Mitchell, FDEP Tallahassee



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

Permittee:

International Paper Company
Pensacola Mill
Post Office Box 87
Cantonment, FL 32533-0087

Permit No.: 0330042-007-AC

Facility ID No.: 0330042

SIC Nos.: 26; 2611

Expiration Date: April 30, 2005

Project: Physical modification of the Kamyrdigester System; addition of a new causticizer with piping; and, installation of 2 medium consistency pumps for the Pine O₂ Delignification and Bleach Plant area

This permit is issued for the following: 1) physical modification of the Kamyrdigester System; 2) addition of a new causticizer with piping to the causticizing/lime production operations; and, installation of 2 medium consistency pumps for the Pine O₂ Delignification and Bleach Plant area. Actual production limitations are being established to effect no changes in actual emissions and are based on calendar years 1998 and 1999. These changes will occur at the existing International Paper Company - 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:

Title V Air Operation Permit Revision No. 0330042-005-AV

Air Construction Permit No. 0330042-006-AC

Documents on file with the Department:

Application request received April 22, 2003

Supplemental Information received via e-mail on May 30, 2003, from Mr. Jim Spahr

Letter with enclosures received July 3, 2003, from Ms. Nicki Slusser

Joseph Kahn, P.E., Acting Director
Division of Air Resource Management

JK/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.]

SPECIFIC CONDITIONS:

A. General. Title V Air Operation Permit, No. 0330042-005-AV, and air construction permit, No. 0330042-006-AC, are incorporated by reference, except for the following changes.

B. Kamyr (Continuous) Digester System (KDS).

1. Production from the KDS shall not exceed 271,985 air dried tons bleached pulp per year nor 293,744 air dried tons unbleached pulp per year [based on the average of calendar years (CYs) 1998 and 1999]. [Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

2. For the construction/modification of the KDS to replace the existing extraction screens with diagonal extraction screens.

1063

C. Causticizing Operations.

1. Lime production shall not exceed 155,108 tons CaO (calcium oxide) per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – PTE, F.A.C.]

2. For the construction of a new causticizer body and support piping.

D. Pine O₂ Delignification and Bleach Plant.

1. Bleach Plant production shall not exceed 245,030 oven dried tons pulp per year, for the A Bleach Plant Line (softwood), nor 239,677 oven dried tons pulp per year, for the B Bleach Plant Line (hardwood) [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – PTE, F.A.C.]

2. For the installation of two (2) medium consistency pumps in the Pine O₂ Delignification and Bleach Plant area.

E. Batch Digester System (BDS).

1. Production from the BDS shall not exceed 266,042 air dried tons bleached pulp per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

F. Recovery Boiler (RB) Operations (Nos. 1 and 2).

1. Black liquor solids firing in the RB Operations (Nos. 1 and 2) shall not exceed 941,560 tons per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

G. Miscellaneous

1. PSD Applicability – Phased Project. Based on the application for the above referenced new emissions unit construction and physical modifications to existing emissions units, International Paper Company has acknowledged that this permitting action addresses only Phase I of a phased project. The Phase II permitting action shall include the impact of the above referenced permitting action and their associated potential pollutant emissions changes as if never constructed or modified.

[Application received April 22, 2003; and, Rule 62-212.400(2)(g), F.A.C.]

12/29/04

Dear Yi,

RE: ARMS updates for your review and approval.

Good afternoon. In ARMS, I have updated the the following permitting project:
International Paper Company: 0330042-007-AC (Constuction – modification)

Many thanks!

Bruce

INTERNATIONAL  PAPER

PENSACOLA MILL
375 MUSCOGEE ROAD
PO BOX 87
CANTONMENT, FL 32533-0087
PHONE: 850.968.2121

RECEIVED
DEC 20 2004
BUREAU OF AIR REGULATIONS

December 14, 2004

Ms. Sandra Veazey
Florida Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, FL
32501-5794

RE: Request for Extension of Expiration Date for Air Construction Permit No. 0330042-007-AC

Dear Ms. Veazey:

International Paper's (IP) Pensacola Mill has been issued the non-PSD Air Construction Permit referenced above. This permit covers Phase I of a two-phase production increase project. Air dispersion modeling conducted for the Phase II PSD Air Construction Permit Application showed ambient air quality problems resulting from Gulf Power's Crist Plant emissions. The permitting process for IP's Phase II AC Permit Application was put on hold pending Gulf Power's resolution of these issues.

Because of this delay, IP has not completed all of the projects associated with the Phase I AC Permit. The physical modification of the Kamyr Digester System has been completed. However, the installation of the new causticizer with associated piping and the two medium consistency pumps has been postponed until 2006.

International Paper hereby requests a two-year extension of the expiration date for Air Construction Permit No. 0330042-007-AC to April 30, 2007.

If you have any questions please contact Jim Spahr at 850.968.2121 x3833.

Sincerely,



Nicki Slusser
Mill Manager

Cc: Bruce Mitchell, FDEP Tallahassee

INTEROFFICE MEMORANDUM

TO: Joseph Kahn

THRU: Scott Sheplak *Bm for*
Trina Vielhauer *TV*

FROM: Bruce Mitchell *Bm*

DATE: July 21, 2003

SUBJ: Final Air Construction Permit No.: 0330042-007-AC
International Paper Company
Pensacola Mill

This air construction permit is being issued for the installation of a new causticizer body and associated piping, the installation of "diagonal" extraction screens in the continuous digester for improved downflow cooking, and the replacement of two (2) medium consistency pumps in the Pine O₂ Delignification and Bleach Plant area at the existing mill located at 375 Muscogee Road, Cantonment, Escambia County.

There is no controversy associated with this permitting action. Therefore, I recommend that this air construction permit be issued as attached.

TLV/sms/bm

Attachment

Joe,
This went out draft & no public comments
other than 1 from the company.
Trina

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

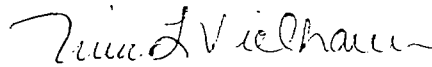
Ms. Nicki Slusser
Mill Manager
International Paper Company – Pensacola Mill
375 Muscogee Road
Cantonment, Florida 32533

DEP File No.: 0330042-007-AC
Escambia County

Enclosed is Final Air Construction Permit, No. 0330042-007-AC. This permit is for the installation of a new causticizer body and associated piping, the installation of "diagonal" extraction screens in the continuous digester for improved downflow cooking, and the replacement of two (2) medium consistency pumps in the Pine O₂ Delignification and Bleach Plant area at the existing mill located at 375 Muscogee Road, Cantonment, Escambia County. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, 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 must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer
Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

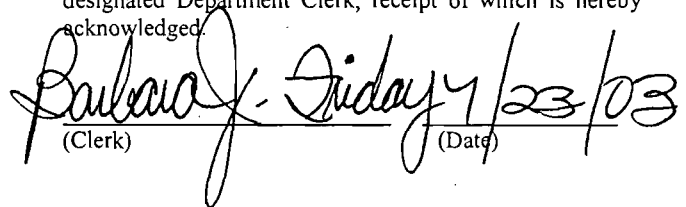
The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 7/23/03 to the person(s) listed:

Ms. Nicki Slusser*, Mill Manager, CIC
Mr. Daniel B. Smith, P.E., CE
Ms. Sandra Veazey, NED
Mr. Jim Spahr, IPC

7/23/03 cc: Bruce Mitchell
Reading File
Trina's File

Clerk Stamp

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


(Clerk) 7/23/03 (Date)

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Ms. Nicki Slusser
 Mill Manager
 International Paper Company -
 Pensacola Mill
 375 Muscogee Road
 Cantonment, Florida 32533

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 X *David J. Howard* Agent Addressee

B. Received by (Printed Name) *DAVID J. HOWARD* C. Date of Delivery *7/24/03*

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
 (Transfer from service label) 7000 2870 0000 7028 1334

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 2870 0000 7028 1334

Ms. Nicki Slusser, Mill Manager

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
 Ms. Nicki Slusser, Mill Manager
 Street, Apt. No.; or PO Box No.
 375 Muscogee Road
 City, State, ZIP+4
 Cantonment, Florida 32533

Final Determination

International Paper Company Pensacola Mill

Permit No.: 0330042-007-AC

I. Public Notice.

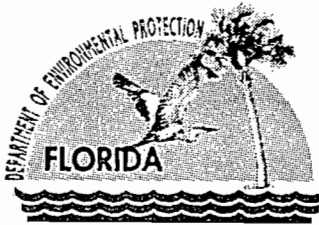
An "INTENT TO ISSUE AIR CONSTRUCTION PERMIT" to International Paper Company – Pensacola Mill, located at 375 Muscogee Road, Cantonment, Escambia County, was clerked on June 16, 2003. The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was published in the Pensacola News Herald on July 1, 2003. The Draft Air Construction Permit was available for public inspection at the Department's Northwest District office in Pensacola and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was received on July 8, 2003.

II. Public Comment(s).

There was one comment received during the Public Notice period, which was received on July 3, 2003. The comment was from Ms. Nicki Slusser, Mill Manager, in which she requested an expiration date of April 30, 2005, instead of April 30, 2004. She stated that there might be some construction delays due to current economic conditions. The request is acceptable and the expiration date has been changed.

III. Conclusion.

The permitting authority will issue the Final Air Construction Permit, No. 0330042-007-AC, and includes the change in the expiration date noted above.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

Permittee:
International Paper Company
Pensacola Mill
Post Office Box 87
Cantonment, FL 32533-0087

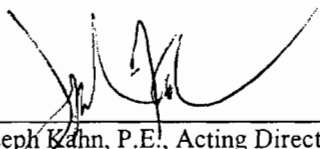
Permit No.: 0330042-007-AC
Facility ID No.: 0330042
SIC Nos.: 26; 2611
Expiration Date: April 30, 2005
Project: Physical modification of the Kamyrdigester System; addition of a new causticizer with piping; and, installation of 2 medium consistency pumps for the Pine O₂ Delignification and Bleach Plant area

This permit is issued for the following: 1) physical modification of the Kamyrdigester System; 2) addition of a new causticizer with piping to the causticizing/lime production operations; and, installation of 2 medium consistency pumps for the Pine O₂ Delignification and Bleach Plant area. Actual production limitations are being established to effect no changes in actual emissions and are based on calendar years 1998 and 1999. These changes will occur at the existing International Paper Company - 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:
Title V Air Operation Permit Revision No. 0330042-005-AV
Air Construction Permit No. 0330042-006-AC

Documents on file with the Department:
Application request received April 22, 2003
Supplemental Information received via e-mail on May 30, 2003, from Mr. Jim Spahr
Letter with enclosures received July 3, 2003, from Ms. Nicki Slusser


Joseph Kahn, P.E., Acting Director
Division of Air Resource Management

JK/sms/bm

"More Protection, Less Process"

Printed on recycled paper.

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.]

SPECIFIC CONDITIONS:

A. General. Title V Air Operation Permit, No. 0330042-005-AV, and air construction permit, No. 0330042-006-AC, are incorporated by reference, except for the following changes.

B. Kamyr (Continuous) Digester System (KDS).

1. Production from the KDS shall not exceed 271,985 air dried tons bleached pulp per year nor 293,744 air dried tons unbleached pulp per year [based on the average of calendar years (CYs) 1998 and 1999]. [Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

2. For the construction/modification of the KDS to replace the existing extraction screens with diagonal extraction screens.

C. Causticizing Operations.

1. Lime production shall not exceed 155,108 tons CaO (calcium oxide) per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – PTE, F.A.C.]

2. For the construction of a new causticizer body and support piping.

D. Pine O₂ Delignification and Bleach Plant.

1. Bleach Plant production shall not exceed 245,030 oven dried tons pulp per year, for the A Bleach Plant Line (softwood), nor 239,677 oven dried tons pulp per year, for the B Bleach Plant Line (hardwood) [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – PTE, F.A.C.]

2. For the installation of two (2) medium consistency pumps in the Pine O₂ Delignification and Bleach Plant area.

E. Batch Digester System (BDS).

1. Production from the BDS shall not exceed 266,042 air dried tons bleached pulp per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

F. Recovery Boiler (RB) Operations (Nos. 1 and 2).

1. Black liquor solids firing in the RB Operations (Nos. 1 and 2) shall not exceed 941,560 tons per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

G. Miscellaneous

1. PSD Applicability – Phased Project. Based on the application for the above referenced new emissions unit construction and physical modifications to existing emissions units, International Paper Company has acknowledged that this permitting action addresses only Phase I of a phased project. The Phase II permitting action shall include the impact of the above referenced permitting action and their associated potential pollutant emissions changes as if never constructed or modified.

[Application received April 22, 2003; and, Rule 62-212.400(2)(g), F.A.C.]

Published Daily-Pensacola, Escambia County, FL

STATE OF FLORIDA
County of Escambia

Before the undersigned authority personally appeared **NIKKI WINDHAM** who is personally known to me and who on oath says that he/she is a representative of The Pensacola News Journal, a daily newspaper published in Pensacola in Escambia County, Florida; that the attached copy of advertisement, being a legal in the matter of **NOTICE OF INTENT** was published in said newspaper in the issues **JULY 1, 2003**. Affidavit further says that the said Pensacola News Journal is a newspaper published in Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and Affidavit further says that he/she has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this **1ST DAY OF JULY A.D., 2003**.

Bereth Ferguson

Notary Public

BERETH FERGUSON
"Notary Public-State of FL"
My Comm. Expires OCT. 10, 2005
Comm. No. DD048662

Draft Permit No.: 0330042-007-AC

International Paper Company
Pensacola Mill
Escambia County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit to International Paper Company - Pensacola Mill for the installation of a new causticizer body and associated piping, the installation of "diagonal" extraction screens in the continuous digester for improved downflow cooking, and the replacement of two (2) medium consistency pumps in the Pine O2 Delignification and Bleach Plant area at the existing mill located at 375 Muscogee Road, Escambia County. The applicant's name and address are: International Paper Company, 375 Muscogee Road, Cantonment, Florida 32533-0087. A Best Available Control Technology was not required pursuant to Rule 62-212.400, Florida Administrative Code (F.A.C.), and 40 CFR 52.21, Prevention of Significant Deterioration (PSD).

Actual production limitations are being established to effect no changes in actual emissions and are based on calendar years 1998 and 1999. Therefore, an air quality impact analysis was not required because there were no significant increases in any pollutant emissions; and, this permitting action will not contribute to or cause a violation of any state or federal ambient air quality standards or increment.

The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue An Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the permitting authority shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.), before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- The name and address of each agency affected and each agency's file or identification number, if known;
- The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;
- A statement of how and when the petitioner received notice of the agency action or proposed action;
- A statement of all disputed issues of material fact. If there are none, the petitioner must so state;
- A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; and
- A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District:
Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8096

The complete project file includes the Technical Evaluation and Preliminary Determination, the Draft Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.

authority personally appeared NIKKI
illegally known to me and who on oath says that
of The Pensacola News Journal, a daily
Pensacola in Escambia County, Florida; that the
document, being a legal in the matter of NOTICE
published in said newspaper in the issues JULY 1,
states that the said Pensacola News Journal is a
Pensacola, in said Escambia County, Florida, and
heretofore been continuously published in said
each day and has been entered as second class
office in Pensacola, in said Escambia County,
year next preceding the first publication of the
document; and Affidavit further says that he/she has
my person, firm, or corporation any discount,
refund for the purpose of securing this
document in the said newspaper.

before me this 1ST DAY OF JULY A.D., 2003.

Notary Public

BERETH FERGUSON
"Notary Public-State of FL"
My Comm. Expires OCT. 10, 2005
Comm. No. DD048662



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

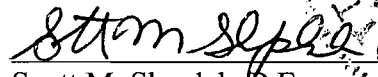
P.E. Certification Statement

Permittee:
International Paper Company
Pensacola Mill

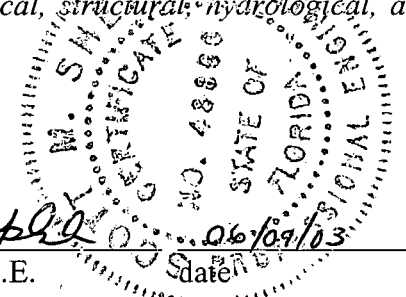
Draft Permit No.: 0330042-007-AC

Project type: Air Construction Permit

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.
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

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. J. Todd Crutcher
 Operations Manager & Responsible
 Official
 International Paper Company
 Pensacola Mill
 375 Muscogee Road
 Cantonment, Florida 32533-0087

2. Article Number

(Transfer from service label)

7000 2870 0000 7028 1167

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Handwritten Signature]

- Agent
- Addressee

B. Received by (Printed Name)

Arthur C. Siskman

C. Date of Delivery

6-17-03

D. Is delivery address different from item 1?

- Yes
- No

If YES, enter delivery address below:

3. Service Type

- Certified Mail
- Express Mail
- Registered
- Return Receipt for Merchandise
- Insured Mail
- C.O.D.

4. Restricted Delivery? (Extra Fee)

- Yes

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)**

7000 2870 0000 7028 1167

Mr. J. Todd Crutcher

Postage

\$

Certified Fee

Return Receipt Fee
 (Endorsement Required)

Restricted Delivery Fee
 (Endorsement Required)

Total Postage & Fees

\$

Postmark
 Here

Sent To

Mr. J. Todd Crutcher

Street, Apt. No., or PO Box No.

375 Muscogee Road

City, State, ZIP+4

Cantonment, Florida 32533-0087

PS Form 3800, May 2000

See Reverse for Instructions



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

June 16, 2003

CERTIFIED MAIL - Return Receipt Requested

Mr. J. Todd Crutcher
Operations Manager & Responsible Official
International Paper Company
Pensacola Mill
375 Muscogee Road
Cantonment, Florida 32533-0087

Re: Draft Air Construction Permit No.: 0330042-007-AC

Dear Mr. Crutcher:

One copy of the Draft air construction permit for the installation of a new causticizer body and associated piping, the installation of "diagonal" extraction screens in the continuous digester for improved downflow cooking, and the replacement of two (2) medium consistency pumps in the Pine O₂ Delignification and Bleach Plant area at the existing mill located at 375 Muscogee Road, Escambia County, is enclosed. The permitting authority's "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" must be published as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Bruce Mitchell at 850/413-9198.

Sincerely,

Trina L. Vielhauer
Chief
Bureau of Air Regulation

TLV/SMS/bm

Enclosures

6/16/03 cc: Bruce Mitchell
Reading File

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

International Paper Company
375 Muscogee Road
Cantonment, Florida 32533-0087

Permit No.: 0330042-007-AC
Pensacola Mill
Escambia County

INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit (copy of Draft Permit enclosed) for the facility detailed in the application specified above, for the reasons stated below.

The applicant, International Paper Company, applied on April 22, 2003, to the permitting authority for an air construction permit for the installation of a new causticizer body and associated piping, the installation of "diagonal" extraction screens in the continuous digester for improved downflow cooking, and the replacement of two (2) medium consistency pumps in the Pine O₂ Delignification and Bleach Plant area at the Pensacola Mill located at 375 Muscogee Road, Escambia County. Actual production limitations are being established to effect no changes in actual emissions and are based on calendar years 1998 and 1999.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. This above actions are not exempt from permitting procedures. The permitting authority has determined that an air construction permit is required to commence or continue operations at the described facility.

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

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax: 850/922-6979), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of

Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when each petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and,
- (f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;

(g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,

(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



Trina L. Vielhauer

Chief

Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the Draft Permit) and all copies were sent by certified mail before the close of business on 6/16/03 to the person(s) listed:

Mr. J. Todd Crutcher, Operations Manager & Responsible Official, IPC

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the Draft Permit) were sent by U.S. mail on the same date to the person(s) listed:

Mr. Daniel B. Smith, P.E., CE
Ms. Sandra Veazey, NED
Mr. Jim Spahr, IPC

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

Barbara J. Friday 6/16/03
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Permit No.: 0330042-007-AC

International Paper Company
Pensacola Mill
Escambia County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit to International Paper Company - Pensacola Mill for the installation of a new causticizer body and associated piping, the installation of "diagonal" extraction screens in the continuous digester for improved downflow cooking, and the replacement of two (2) medium consistency pumps in the Pine O₂ Delignification and Bleach Plant area at the existing mill located at 375 Muscogee Road, Escambia County. The applicant's name and address are: International Paper Company, 375 Muscogee Road, Cantonment, Florida 32533-0087. A Best Available Control Technology was not required pursuant to Rule 62-212.400, Florida Administrative Code (F.A.C.), and 40 CFR 52.21, Prevention of Significant Deterioration (PSD).

Actual production limitations are being established to effect no changes in actual emissions and are based on calendar years 1998 and 1999. Therefore, an air quality impact analysis was not required because there were no significant increases in any pollutant emissions; and, this permitting action will not contribute to or cause a violation of any state or federal ambient air quality standards or increment.

The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue An Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the permitting authority shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.), before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the

proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;

(c) A statement of how and when the petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; and

(f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District:

Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8096

The complete project file includes the Technical Evaluation and Preliminary Determination, the Draft Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

International Paper Company
Pensacola Mill
Facility ID No.: 0330042
Escambia County

Air Construction Permit No.: 0330042-007-AC

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114
Fax: 850/922-6979

Compliance Authority:

Department of Environmental Protection
Northwest District
160 Government Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8096

1. APPLICATION INFORMATION.

1.1. Applicant Name and Address:

International Paper Company
Pensacola Mill
375 Muscogee Road
Cantonment, Florida 32533-0087

1.2. Reviewing and Process Schedule:

Date of Receipt of Application: April 22, 2003

2. FACILITY INFORMATION.

2.1. Facility Location

The International Paper Company - 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 International Paper Company - 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 Source.

3. PROJECT DESCRIPTION.

The permitting authority has determined that an air construction permit is required in order to construct some new emissions units, which include the following: installation of a new causticizer body and associated piping; the installation of "diagonal" extraction screens in the continuous digester for improved downflow cooking; and, the replacement of two (2) medium consistency pumps in the Pine O₂ Delignification and Bleach Plant area. Additional permitting will be required to accommodate an increase in pulp production for an additional 150 air dried bleached pulp tons per day. However, the mill will be capped to the average of two previous years, specifically 1998 and 1999, of actual production in the areas affected to avoid PSD preconstruction review under New Source Review (NSR) pursuant to Rule 62-212.400(5), Florida Administrative Code (F.A.C.). The assumption is that, with no increase in actual production, there will be no increase in actual emissions. Therefore, the new construction will be considered to be a minor change to a major facility pursuant to Rule 62-212.400(2)(d)4.b., F.A.C.

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

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.

5. SOURCE IMPACT ANALYSIS.

5.1. Control Technology Review:

There is no control technology review required.

5.2. Air Quality:

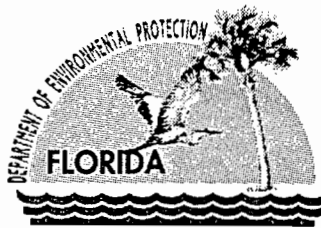
Based on the request, no air quality analysis is required and this proposed activity should not cause a violation of any air quality standard or increment.

6. CONCLUSION.

Based on the foregoing technical evaluation of the application submitted by the International Paper Company - 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.

Permit Engineer: Bruce Mitchell

Reviewed and Approved by Scott Sheplak, P.E.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

Permittee:

International Paper Company
Pensacola Mill
Post Office Box 87
Cantonment, FL 32533-0087

Permit No.: 0330042-007-AC

Facility ID No.: 0330042

SIC Nos.: 26; 2611

Expiration Date: April 30, 2004

Project: Physical modification of the Kamyrdigester System; addition of a new causticizer with piping; and, installation of 2 medium consistency pumps for the Pine O₂ Delignification and Bleach Plant area

This permit is issued for the following: 1) physical modification of the Kamyrdigester System; 2) addition of a new causticizer with piping to the causticizing/lime production operations; and, installation of 2 medium consistency pumps for the Pine O₂ Delignification and Bleach Plant area. Actual production limitations are being established to effect no changes in actual emissions and are based on calendar years 1998 and 1999. These changes will occur at the existing International Paper Company - 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:

Title V Air Operation Permit Revision No. 0330042-005-AV
Air Construction Permit No. 0330042-006-AC

Documents on file with the Department:

Application request received April 22, 2003
Supplemental Information received via e-mail on May 30, 2003, from Mr. Jim Spahr

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

HLR/sms/bm

"More Protection, Less Process"

Printed on recycled paper.

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.]

SPECIFIC CONDITIONS:

A. General. Title V Air Operation Permit, No. 0330042-005-AV, and air construction permit, No. 0330042-006-AC, are incorporated by reference, except for the following changes.

B. Kamyr (Continuous) Digester System (KDS).

1. Production from the KDS shall not exceed 271,985 air dried tons bleached pulp per year nor 293,744 air dried tons unbleached pulp per year [based on the average of calendar years (CYs) 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

2. For the construction/modification of the KDS to replace the existing extraction screens with diagonal extraction screens.

C. Causticizing Operations.

1. Lime production shall not exceed 155,108 tons CaO (calcium oxide) per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – PTE, F.A.C.]

2. For the construction of a new causticizer body and support piping.

D. Pine O₂ Delignification and Bleach Plant.

1. Bleach Plant production shall not exceed 245,030 oven dried tons pulp per year, for the A Bleach Plant Line (softwood), nor 239,677 oven dried tons pulp per year, for the B Bleach Plant Line (hardwood) [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – PTE, F.A.C.]

2. For the installation of two (2) medium consistency pumps in the Pine O₂ Delignification and Bleach Plant area.

E. Batch Digester System (BDS).

1. Production from the BDS shall not exceed 266,042 air dried tons bleached pulp per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

F. Recovery Boiler (RB) Operations (Nos. 1 and 2).

1. Black liquor solids firing in the RB Operations (Nos. 1 and 2) shall not exceed 941,560 tons per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

G. Miscellaneous

1. PSD Applicability – Phased Project. Based on the application for the above referenced new emissions unit construction and physical modifications to existing emissions units, International Paper Company has acknowledged that this permitting action addresses only Phase I of a phased project. The Phase II permitting action shall include the impact of the above referenced permitting action and their associated potential pollutant emissions changes as if never constructed or modified.

[Application received April 22, 2003; and, Rule 62-212.400(2)(g), F.A.C.]

INTERNATIONAL  PAPER

PENSACOLA MILL
375 MUSCOGEE ROAD
PO BOX 87
CANTONMENT, FL 32533-0087
PHONE: 850.968.2121

RECEIVED

APR 22 2003

BUREAU OF AIR REGULATION

April 21, 2003

Mr. Bruce Mitchell
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

RE: Air construction permit application for International Paper's Pensacola Mill

Dear Mr. Mitchell:

The purpose of this letter is to formally submit an Air Construction Permit Application for Phase I of the Mill Viability Project at International Paper's (IP) Pensacola Mill. Two Copies of the permit application are enclosed.

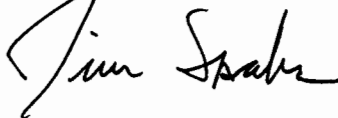
The permit application addresses the following modifications:

- Installation of a new causticizer body and support piping. After completion of the Phase II activities, the addition of the new causticizer body in conjunction with changes to the Lime Slaker will enable the Mill to meet the future white liquor requirements to support the additional 150 ADBT/day.
- Installation of "diagonal" extraction screens in the continuous digester for improved downflow cooking.
- Replacement of two (2) medium consistency (MC) pumps in the Pine O₂ Delignification and bleach plant area. After completion of the Phase II activities, when three (3) additional MC pumps will be replaced, the new MC pumps will enable the Mill to meet the additional 150 ADBT/day.

IP's goal is to complete these modifications during the October 2003 Outage. The enclosed construction permit application for these modifications was prepared pursuant to 62-212.400(2)(d)4.b. (FAC) and is viewed as a "modification to a minor facility". During this phase of the permitting, IP will maintain the federally enforceable production limits currently affecting the emissions units and provide calculations demonstrating that the emission increase associated with these modifications will be below the applicable PSD significance emission rates; thus qualifying as a "modifications to minor facilities".

If you have any questions or require any additional information please contact me at 850-968-2121 x3833.

Sincerely,



Jim Spahr
Sr. Environmental Engineer

Enclosure: 2

Cc: Sandra Veazey, FDEP Northwest District

**WASTE WATER
TREATMENT SYSTEM
MILL VIABILITY
PROJECT**

RECEIVED

APR 22 2003

BUREAU OF AIR REGULATION

**Air Construction Permit –
Phase I Application**

Submitted By:

**INTERNATIONAL PAPER
COMPANY
PENSACOLA MILL
375 Muscogee Road
Cantonment, FL 32533-0087
Escambia County**

INTERNATIONAL  PAPER

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1. INTRODUCTION AND APPLICATION ORGANIZATION

International Paper Company (IP) owns and operates a Kraft pulp and paper mill in Cantonment, Florida (Pensacola Mill or Mill). The IP Mill is a major source as defined by the federal operating permit program (40 CFR Part 70) and the federal new source review (NSR) program (40 CFR Part 52). In addition, the IP Mill is also subject to the Florida Title V Permit Regulations and New Source Review Regulations, Chapter 62-213 and Chapter 62-212, respectively. As a result, the Pensacola Mill is required to submit this air construction permit application to modify several emission units at the Mill. This document contains the required information and permit application forms for the IP Pensacola Mill to obtain an air construction permit to modify several emission units at the Mill. The information contained herein has been developed to meet the completeness and accuracy requirements of both the State and Federal programs. The application has also been carefully presented to facilitate the application review process and development of the air construction permit.

1.1 GENERAL FACILITY DESCRIPTION

The IP Pensacola Mill is located in Escambia County in Cantonment, Florida. The mill is under the jurisdiction of the following State and Federal agencies:

**Florida DEP
Division of Air Resources Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400**

**United States EPA - Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303**

**Florida DEP, Northwest District Air Program
160 Governmental Center
Pensacola, Florida 32501-5794**

The IP Mill converts hardwood and softwood logs into wood pulp and paper through a variety of process operations. Figure 1-1 is a plot plan showing the location of the mill. Figure 1-2 is a process flow diagram depicting the overall operations at the IP Pensacola Mill.

1-2

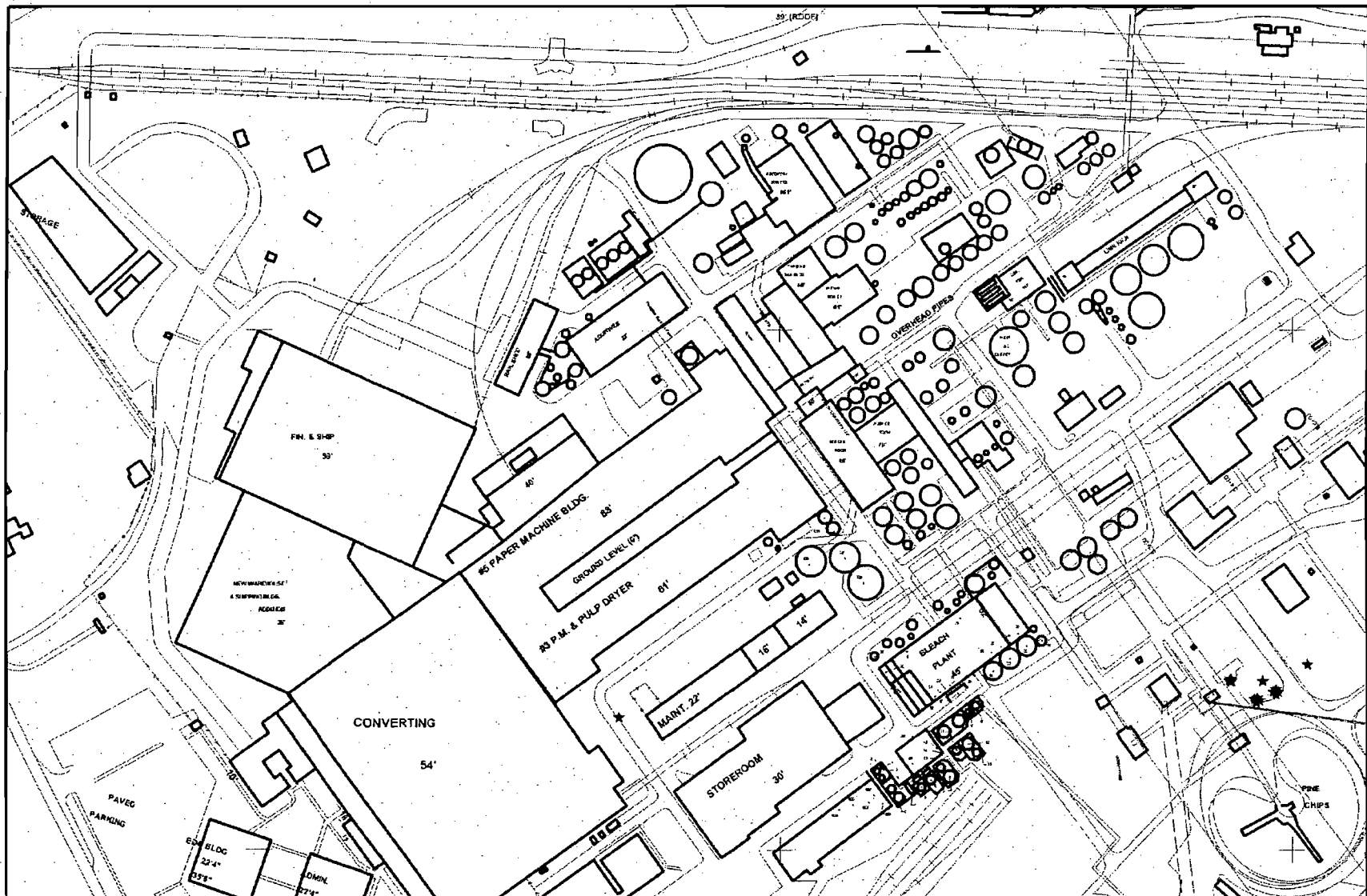
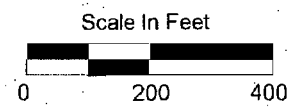
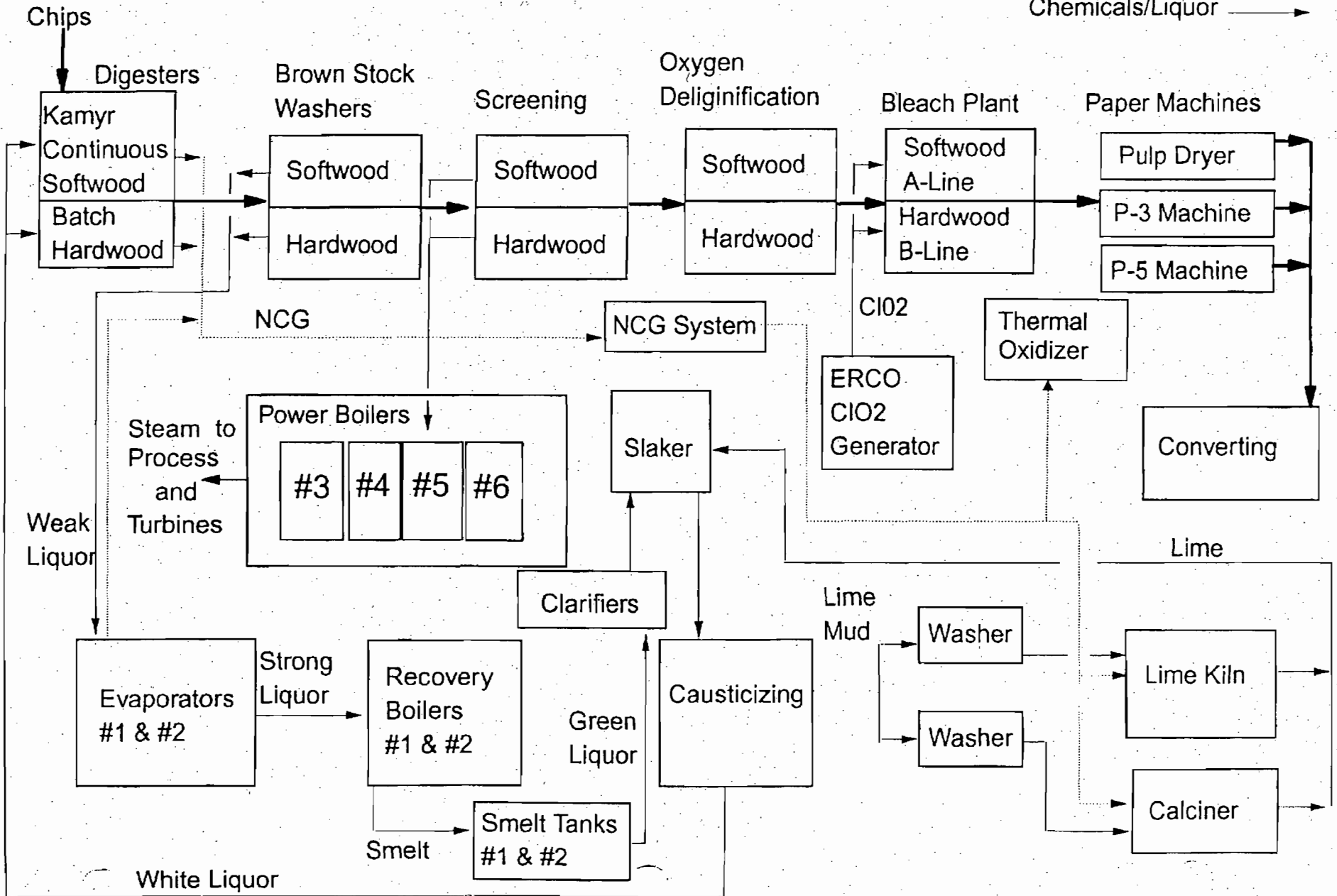


Figure 1-1
Facility Plot Plan
International Paper
Pensacola, Florida



**FIGURE 1-2
INTERNATIONAL PAPER – PENSACOLA MILL
FACILITY PROCESS FLOW DIAGRAM**

Chips/Pulp →
Off Gases
Chemicals/Liquor →



1.2 PROPOSED PROJECT

The Pensacola Mill has initiated plans for a multi-year project to upgrade the waste water treatment system and install a pipeline to future constructed wetlands at the head of the Perdido Bay. The waste water treatment project is a multi-million dollar investment that will result in many environmental benefits for the area. However, there will be no economic return on investment (ROI) to the mill for the project. As a result, IP conducted a complete economic analysis for the Pensacola Mill operations and it was determined that, concurrently with the waste water treatment project, the mill will need to produce an additional 150 ADBT/day of slush pulp to offset the project costs and achieve an acceptable ROI for the mill operations. In order to achieve the pulp production capacity increase and secure the future viability of the Mill, IP has determined that it will be necessary to modify the following systems:

- Continuous Digester System
- No. 1 and No. 2 Recovery Furnaces and Smelt Dissolving Tanks
- No. 2 Evaporator Set
- Lime Kiln/Mud Dryer
- Bleach Plant
- Brown Stock Washer
- Lime Slaker/Causticizer (one new body, part of the set of 4 bodies)

IP would like to incorporate these changes over several planned mill outages beginning in the Fall of 2003. The staging of these changes is critical and several of the less substantial changes are required to be completed in the Fall of 2003 in order to enable the mill to make the significant modifications during the Spring and Fall 2004 outages.

1.3 PROPOSED PERMITTING APPROACH

As outlined above, the successful completion of these projects requires extensive coordination and the initiation of several changes during the Fall 2003 outage. In order to accomplish this goal and to satisfy the preconstruction review requirements, IP proposes to use a phased permitting approach and to pursue a construction permit pursuant to 62-212.400(2)(d)4.b for the Phase I activities which will be reviewed as a “modification to a minor facility”.

During Phase I of the project, IP will maintain production levels equal to the historical actual production levels during the 1998/1999 calendar years to ensure that the first phase of the project will not trigger a Prevention of Signification Deterioration (PSD) permitting exercise. Phase I activities will be completed during the Fall 2003 Outage. These historical actual production values are provided below.

<i>Unit^(a)</i>	<i>1998 Production</i>	<i>1999 Production</i>	<i>1998/1999 Average Production</i>
Continuous Digester Pulp Production (ADTBP/yr)	271,770	272,199	271,985
Batch Digester Pulp Production (ADTBP/yr)	261,824	270,259	266,042
Continuous Digester Pulp Production (ADTUP/yr)	293,512	293,975	293,744
Recovery Furnace BLS firing (Ton BLS/yr)	932,499	950,620	941,560
Lime Production (Ton CaO/yr)	152,506	157,710	155,108

^(a) ADTBP/yr – air dried ton bleached pulp/yr. ADTUP/yr – air dried ton unbleached pulp/yr.
Ton BLS/yr – ton black liquor solids/yr. Ton CaO/yr – ton CaO produced per year.

Concurrent with these activities, IP will work with the DEP to obtain a PSD permit for the Phase II activities that are scheduled to begin during the Spring 2004 outage. During the Phase II permitting, IP will consider all activities from both phases to complete the requisite PSD applicability analysis, detailed best available control determinations, and air quality modeling analysis.

With this permitting strategy as the framework for the project, IP proposes to include the following activities as part of the Phase I permitting and has addressed them in this application:

- Replace the existing extraction screens with diagonal extraction screens to improve downflow cooking in the Kamyr Digester System. The Kamyr Digester System is currently controlled by the Low Volume High Concentration (LVHC) non-condensable gas (NCG) handling system and is routed to the thermal oxidizer for control. IP believes that this represents BACT for this unit and will identify it as such in the Phase II permitting activities.
- Installation of a new causticizer body and support piping. After completion of the Phase II activities, the addition of the new causticizer body in conjunction with changes to the Lime Slaker will enable the Mill to meet the future white liquor requirements to support the additional 150 ADBT/day. IP has reviewed the RACT/BACT/LAER Clearinghouse (RBLC) for BACT determinations for causticizers. The only BACT entry is for particulate matter emissions for a combined slaker/causticizer vent. The Pensacola Mill causticizer and slaker vent through separate stacks. IP has historically identified particulate matter emissions from the slaker; however, IP does not have any data to indicate particulate matter emissions from the causticizers. As a result, IP believes that BACT is no control for the new causticizer body and will address it as such in the Phase II permitting activities.
- Replacement of two (2) medium consistency (MC) pumps in the Pine O₂ Delignification and bleach plant area. After completion of the Phase II activities, when three (3) additional MC pumps will be replaced, the new MC pumps will enable the Mill to meet the additional 150 ADBT/day. IP does not believe that the new MC pumps qualify as emission units and consequently BACT is not applicable to the new MC pumps.

1.4 PROJECT SCHEDULE

All of the Phase I activities are scheduled to commence during the Fall 2003 Outage. IP recognizes that these activities may not commence until after receipt of a permit to construct and is prepared to work closely with DEP to satisfy this timeline. IP also envisions submitting the Phase II permit application in late Spring 2003 in order to obtain the Phase II construction Permit in the late Fall 2003.

IP has communicated this aggressive project timeline to DEP and appreciates the commitment from DEP to work towards these goals. IP is prepared to assist DEP with meeting these goals to ensure the future viability of the Mill and successful completion of the waste water treatment project.

1.5 APPLICATION ORGANIZATION

The remainder of this application includes the following information and documentation to support this application to obtain a permit to construct:

- Section 2: Emissions Inventory – provides information on the methods used to calculate the actual emission rates and the future potential to emit for the Phase I activities.
- Section 3: Applicable Requirements – contains a summary of Federal and State of Florida air regulations potentially applicable to the proposed project.
- Section 4: DEP Application Forms – contains all of the required DEP forms for a complete application.

2. EMISSIONS INVENTORY

IP calculated emissions associated with the Phase I activities to determine if there were an emissions increase associated with any PSD pollutants. A summary of the emission calculations provided for each of the Phase I emissions units is provided below. Table 2-1 summarizes the emission inventory for the Phase I activities.

2.1 CAUSTICIZING OPERATIONS

IP reviewed the emissions associated with the addition of a new causticizer body. IP has historically identified VOC emissions from the causticizers and used an emission factor of 0.00139 lb/ton CaO. Since the causticizer body is new, IP identified no emissions for the 1998/1999 baseline scenario and used the 1998/1999 average production rate and the historical VOC emission factor to develop the future post Phase I activities emission rate (i.e., future potential to emit).

2.2 A AND B BLEACH PLANT LINES (E.U. 050 AND 051)

IP has historically quantified VOC emissions from the bleach plant scrubbers. In addition to VOC emissions, NCASI has identified CO emissions from bleach plant sources (see NCASI Technical Bulletin 760, Mill SA data). IP has selected a CO emission factor of 0.63 lb/oven dried tons of paper (ODTP) for the A Bleach Plant Line and 0.54 lb/ODTP for the B Bleach Plant Line. IP has also used mill-specific test data of 0.52 lb/hr for VOC emissions from the A Bleach Plant Line and 0.39 lb/hr for VOC emissions from the B Bleach Plant Line.

2.3 KAMYR DIGESTER SYSTEM (E.U. 063)

The Kamyr Digester System is one of the multiple sources that are routed to the LVHC NCG Handling System and vented to the thermal oxidizer or the lime kiln. The Kamyr Digester System gas stream contains VOC, TRS, and hazardous air pollutants (HAPs). IP quantified VOC and TRS emissions from Kamyr Digester System venting scenarios for the 1998/1999

baseline scenario (165 hours) since the gases are normally routed to the Lime Kiln. A ratio of the vent hours to total Kamyr operating hours was used along with uncontrolled VOC and TRS emission factors and the total unbleached pulp production from the Kamyr Digester System to develop actual emission rates during the venting conditions. In the future post Phase I activities scenario, IP used the 40 CFR 60, Subpart S allowable vent time of 1% which equates to a maximum of 87.6 hours. IP also used the uncontrolled VOC and TRS emission factors and the Kamyr Digester System unbleached production values to develop the emission rates.

TABLE 2-1
INTERNATIONAL PAPER - PENSACOLA MILL
SUMMARY OF PHASE I ACTIVITIES
EMISSIONS INVENTORY

E.U. NUMBER	EMISSIONS UNIT	1998/1999 BASELINE EMISSIONS					FUTURE POST PHASE I EMISSIONS					PHASE I ACTIVITIES (PROJECT RELATED) EMISSIONS (TONS/YR) ^(e)
		POLLUTANT	EMISSION FACTOR ^(a)	UNITS	THROUGHPUT ^(b)	UNITS	EMISSION RATE (TONS/YR) ^(c)	EMISSION FACTOR	UNITS	THROUGHPUT	UNITS	
N/A	Causticizing Operations - New Causticizer	VOC	0.00139 lb/ton CaO		0 tons CaO/yr	0	0.00139 lb/ton CaO		155,108 tons CaO/yr		0.11	0.11
050, 051	Bleach Plant Operations	A Bleach Plant Line (Softwood)	CO	0.63 lb/ODTP		245,030 ODTP/yr	77.18	0.63 lb/ODTP		245,030 ODTP/yr	77.18	0.00
		B Bleach Plant Line (Hardwood)	CO	0.54 lb/ODTP		239,677 ODTP/yr	64.71	0.54 lb/ODTP		239,677 ODTP/yr	64.71	0.00
		A Bleach Plant Line (Softwood)	VOC	0.52 lb/hr		8,236 hr/yr	2.14	0.52 lb/hr		8,236 hr/yr	2.14	0.00
		B Bleach Plant Line (Hardwood)	VOC	0.39 lb/hr		8,327 hr/yr	1.62	0.39 lb/hr		8,327 hr/yr	1.62	0.00
063	Kamyr Digester System	VOC				165 vent hours/yr	3.19			88 vent hours/yr	1.98	-1.21
		TRS				165 vent hours/yr	8.55			88 vent hours/yr	7.34	-1.21

(a) - The origination of the emission factors is explained in the Section 2 narrative.

(b) - Bleach Plant ODTP/yr throughput numbers are based on 1998/1998 baseline ADTP/yr values using a conversion of 1.11 ADTP/ODTP (NCASI TB 676). Bleach Plant hours of operation are based on 1999 actual hours of operation.

(c) - Baseline emission rates are 0 tons/yr for the New Causticizer (not in operation) and baseline emission rates for the Kamyr Digester system are based on actual direct to atmosphere venting time (see 1998 and 1999 AOR) as the gases were normally routed to the Lime Kiln during the 1998/1999 time period. The vent time was combined with the uncontrolled emission factors of 5 lb/ADTUP for TRS and 1.35 lb/ADTUP for VOC to calculate emissions.

(d) - Future Post Phase I emission rates are based on the NCASI emission factor and the average 1998/1999 production rates for the New Causticizer. Emission rates for the Kamyr Digester System are based on the 40 CFR 60, Subpart S 1% allowable venting time (87.6 hours), the mill uncontrolled VOC and TRS emission factors from note (c) above, and the total 1998/1999 unbleached pulp production from the Kamyr Digester System.

$$(\text{Emission Factor [lb/ADTUP]}) \times (293,744 \text{ [ADTUP/yr]}) \times ((87.6 \text{ [vent hours]}) / (8760 \text{ [operating hours]})) / (2000 \text{ [lb/ton]})$$

(e) - Project Related emissions are based on the difference of the Future Post Phase I emission rates and the 1998/1999 baseline emission rates.

3. APPLICABLE REQUIREMENTS

The Pensacola Mill has reviewed the federal and State of Florida air quality regulations to determine which regulations potentially apply to Phase I of the proposed project. Regulations that the facility has determined are generally applicable such as Chapter 62-296.320(2) regulating opacity and Chapter 62-296.320(4)(b) regulating objectionable odors are neither identified nor discussed herein since they apply facility-wide.

3.1 FEDERAL AIR QUALITY REGULATIONS

For the purpose of this application, potentially applicable federal regulations are defined as:

- New Source Performance Standards (NSPS)
- National Emission Standards for Hazardous Air Pollutants (NESHAP)
- New Source Review (NSR)
- Compliance Assurance Monitoring (CAM)

A discussion of each specific federal requirement is provided in the following subsections.

3.1.1 New Source Performance Standards (NSPS)

The United States Environmental Protection Agency (EPA) has promulgated standards of performance for new, modified, or reconstructed sources of air pollution at 40 CFR Part 60. The Causticizing Operations and the A and B Bleach Plant Lines (E.U. 050 and 051) are not regulated under a source category listed in 40 CFR Part 60. The facility's Kamyr Digester System (E.U. 063) is already subject to the provisions of 40 CFR 60 in 40 CFR 60, Subpart BB and will not be impacted by the Phase I activities.

3.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

NESHAPs promulgated prior to the Clean Air Act Amendments (CAAA) of 1990, found in 40 CFR Part 61, apply to specific compounds emitted from certain listed processes. Pursuant to the CAAA of 1990, process-specific NESHAP are promulgated in 40 CFR Part 63. NESHAPs

promulgated under 40 CFR Part 63, also referred to as Maximum Achievable Control Technology (MACT) standards, apply to certain identified source categories that are considered area sources or major sources of hazardous air pollutants (HAP). A major source of HAP is defined as a source with the facility-wide potential to emit any single HAP of 10 tons per year or more, or with a facility-wide potential to emit total HAP of 25 tons per year or more.

The Pensacola Mill qualifies as a major source of HAPs and various processes at the Mill are subject to NESHAPs promulgated under 40 CFR Part 61 and MACT standards under 40 CFR Part 63. The A and B Bleach Plant Lines (E.U. 050 and 051) and the Kamyir Digester System (E.U. 063) are subject to 40 CFR 63, Subpart S. The activities associated with Phase I of this permitting exercise will not impact the applicability of 40 CFR 63, Subpart S or any other NESHAP/MACT standards.

3.1.3 New Source Review (NSR)

Escambia County is classified as in attainment or unclassifiable for the NAAQS for all NSR-regulated pollutants; therefore, Nonattainment New Source Review regulations do not apply to this project. However, the project must be evaluated for PSD-significance since the Pensacola Mill is classified as a major source with respect to the federal PSD rules.

The only sources subject to the PSD regulations are “major stationary sources” and “major modifications” located in areas designated as attainment or unclassifiable for the NAAQS. The proposed Phase I activities described herein, by themselves, do not trigger PSD regulations since the project related emissions increases (i.e., total future potential to emit from new and modified emissions units minus baseline actual emission rates) are below the PSD-significance levels for all PSD pollutants. The Phase II activities will trigger the PSD regulations and any emissions associated with the Phase I activities will also be included in the Phase II PSD permitting analysis.

3.1.4 Compliance Assurance Monitoring (CAM)

EPA's CAM rule is codified at 40 CFR Part 64. Section 64.2 of the CAM rule specifies the criteria for determining applicability with the CAM rule, and Table 3-2 summarizes the applicability requirements for Part 64. If an emissions unit satisfies *all* of the applicability requirements listed in Table 3-1, the emissions unit is subject to CAM. Otherwise, Part 64 does not apply to the emissions unit.

**Table 3-1
CAM Applicability Requirements Summary**

Part 64 Reference	Requirement
§64.2(a)	Unit is located at major source that is required to obtain a Title V permit.
§64.2(a)(1)	Unit is subject to an emission limitation or standard for an applicable pollutant.
§64.2(a)(2)	Unit uses a control device to achieve compliance with this applicable limitation or standard (See §64.1 for definition of control device).
§64.2(a)(3)	Potential pre-control emissions of the applicable pollutant from the unit are at least 100 percent of major source threshold amount (i.e., greater than 100 ton/yr).
§64.2(a)(b)	Unit is not otherwise exempt.

Based on the aforementioned criteria, none of the units impacted by the Phase I activities is subject to the CAM rule since they do not use a control device to achieve compliance with an applicable emission limitation or they do not have pre-controlled emissions that are greater than 100 ton/yr.

3.2 STATE OF FLORIDA REQUIREMENTS

The proposed modified emissions units are potentially subject to the following State of Florida air regulations which are codified in Chapter 62 of the Florida Administrative Code (F.A.C.):

- Chapter 62-204 – Air Pollution Control - General Provisions
- Chapter 62-212 – Preconstruction Review
- Chapter 62-213 – Operation Permits for Major Sources for Air Pollution

- Chapter 62-296 – Stationary Sources - Emission Standards
- Unit-specific Title V Permit Conditions

A discussion of each specific state requirement is provided in the following subsections.

3.2.1 Chapter 62-204 – Air Pollution Control - General Provisions

The provisions of this rule establish the framework for the Florida air permitting programs. The IP Mill has undergone numerous permitting exercises at the Mill over its lifetime and are subject to the general provisions outlined in Chapter 62-204.

3.2.2 Chapter 62-212 Stationary Sources – Preconstruction Review

Chapter 62-212 adopts and implements parts of the federal regulations and also outlines specific requirements for Florida. As previously stated in Section 3.1.3, the proposed Phase I activities project is not subject to the Nonattainment provisions of the rule since the Mill is located in an attainment area. In addition, the Phase I activities are not subject to the PSD provisions of the rule since they qualify as a “Modification to a Minor Facility” pursuant to 62-212.400(2)(d)4.b.

3.2.3 Chapter 62-213 Operation Permits for Major Sources of Air Pollution

Chapter 62-213 implements the Title V Operating Permit Program. As previously stated in the introduction, The IP Mill is a major stationary source with respect to Title V and currently operates pursuant to a Title V Operating Permit (Permit No. 0330042-005-AV). IP will continue to operate pursuant to this permit and will work with the DEP to update the permit to include the Phase I and Phase II activities at a later date, independent of these permitting exercises.

3.2.4 Chapter 62-296 – Stationary Sources - Emission Standards

There Phase I activities are potentially subject to Chapter 62-296.404 – Kraft (Sulfate) Pulp Mills and Tall Oil Plants. The Kamyrdigester System (E.U. 063) is currently subject to the total reduced sulfur emissions provisions of this rule and will continue to be subject to these requirements.

3.2.5 Unit-specific Title V Permit Conditions

The Pensacola Mill is currently operating pursuant to a Title V Operating Permit. Provided below is a summary of the existing Title V Permit conditions that impact the Phase I activities.

The Causticizing Operations and the A and B Bleach Plant Lines (E.U. 050 and 051) are not regulated under a source category listed in 40 CFR Part 60. The facility's Kamyr Digester System (E.U. 063) is subject to 40 CFR 60, Subpart BB and these requirements have been incorporated into the Mill's Title V Permit.

3.2.5.1 Causticizing Operations

The causticizing operations have been identified as an Unregulated Emissions Unit under Appendix U of the Title V Operating Permit and are not subject to any unit-specific requirements.

3.2.5.2 A and B Bleach Plant Lines (E.U. 050 and 051)

The A and B Bleach Plant Lines are subject to the following Title V Permit Requirements:

- The maximum operating rate for the A Bleach Plant Line is 888 air dried bleached tons per day.
- The maximum operating rate for the B Bleach Plant Line is 830 air dried bleached tons per day.
- The Maximum average total for both lines is 1,500 air dried bleached tons per calendar day.
- The bleach plant lines are permitted to operate 8,760 hours per year.
- The Mill shall demonstrate compliance with emission standards by using a surrogate parameter control of the scrubber white liquor pH (minimum of 10.0, 12-hour average).

3.2.5.3 Kamyr Digester System (E.U. 063)

The Kamyr Digester System is subject to the following Title V Permit Requirements:

- The Kamyr Digester System is vented to the Low Volume High Concentration (LVHC) Non-Condensable Gas (NCG) Handling System.
- For the purposes of performance testing, the maximum operating rate for the Kamyr Digester System is 40 air dried unbleached tons per hour.
- The Kamyr Digester System is permitted to operate 8,760 hours per year.
- Emissions from the Kamyr Digester System shall be collected and incinerated in the thermal oxidizer or the lime kiln.
- A log on NCG venting shall be maintained and available for inspection.
- Cumulative venting time shall not exceed ten days in any annual period.

4. DEP APPLICATION FORMS

FAC 62-213.420(1) requires Title V facilities to complete DEP permit application forms as part of the Title V application package. This section of the application report is comprised of the completed DEP 62-210.900 (1) Title V Permit Application forms. The forms are divided into the following sections:

- **SECTION I – Application Information** – includes facility identification and general information on the scope and purpose of the application.
- **SECTION II – Facility Information** – provides general facility information, facility regulations, facility pollutants and facility supplemental information.
- **SECTION III – Emissions Unit Information** – provides general emission unit information, emissions unit capacity, emissions unit regulations, emission point data, process/fuel data, emissions unit pollutants, emission unit pollutant detail information, visible emission information, continuous monitor information, and emissions unit supplemental information for each of the significant emissions units, as listed below.

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: <i>International Paper Company</i>	
2. Site Name: <i>Pensacola Mill</i>	
3. Facility Identification Number: <i>10PEN170042</i> [] Unknown	
4. Facility Location: <i>Cantonment, FL</i> Street Address or Other Locator: <i>375 Muscogee Road</i> City: <i>Cantonment</i> County: <i>Escambia</i> Zip Code: <i>32533-0087</i>	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: <i>Jim Spahr, Senior Environmental Engineer</i>	
2. Application Contact Mailing Address: Organization/Firm: <i>International Paper Company Pensacola Mill</i> Street Address: <i>375 Muscogee Road</i> City: <i>Cantonment</i> State: <i>FL</i> Zip Code: <i>32533-0087</i>	
3. Application Contact Telephone Numbers: Telephone: <i>(850) 968 - 2121 x3833</i> Fax: <i>(850) 968 - 3068</i>	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<i>4-27-03</i>
2. Permit Number:	<i>0330049-007-AC</i>
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

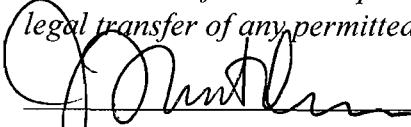
Reason for revision: _____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: <i>J. Todd Crutcher, Operations Manager</i>
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: <i>International Paper Company Pensacola Mill</i> Street Address: <i>375 Muscogee Road</i> City: <i>Cantonment</i> State: <i>FL</i> Zip Code: <i>32533-0087</i>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <i>(850) 968 - 2121</i> Fax: <i>(850) 968 - 3068</i>
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature _____ Date <u>4/21/03</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: <i>Daniel B. Smith</i> Registration Number: <i>35633</i>
2. Professional Engineer Mailing Address: <i>P. O. Box 12101 Pensacola, FL 32590</i> Organization/Firm: <i>Cornerstone Engineering</i> Street Address: <i>125 South Alcaniz</i> City: <i>Pensacola</i> State: <i>Florida</i> Zip Code: <i>32502</i>
3. Professional Engineer Telephone Numbers: Telephone: <i>(850) 438 - 3449</i> Fax: <i>(850) 438 - 9376</i>

Construction/Modification Information

1. Description of Proposed Project or Alterations:

See attached application narrative

2. Projected or Actual Date of Commencement of Construction: *10/03*

3. Projected Date of Completion of Construction: *12/03*

Application Comment

[Empty box for Application Comment]

Facility Regulatory Classifications

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input checked="" type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input checked="" type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters):	

List of Applicable Regulations

<i>See attached application narrative</i>	

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements *See attached application narrative*

1. Area Map Showing Facility Location: [X] Attached, Document ID: _____ [] Not Applicable [] Waiver Requested
2. Facility Plot Plan: [] Attached, Document ID: _____ [] Not Applicable [X] Waiver Requested – <i>see previously submitted Title V Permit Application</i>
3. Process Flow Diagram(s): [X] Attached, Document ID: _____ [] Not Applicable [] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [] Attached, Document ID: _____ [] Not Applicable [X] Waiver Requested <i>IP currently maintains roadways and equipment to minimize the generation of fugitive emissions.</i>
5. Fugitive Emissions Identification: [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
6. Supplemental Information for Construction Permit Application: [X] Attached, Document ID: _____ [] Not Applicable <i>See attached application narrative</i>
7. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <i>See attached application narrative</i> <input checked="" type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input checked="" type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: <u>March 23, 2001 – NW District Air Program – Change of ownership</u>) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <i>Causticizing Area</i>			
4. Emissions Unit Identification Number: ID:		<input checked="" type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code: <i>A</i>	6. Initial Startup Date: <i>Variable</i>	7. Emissions Unit Major Group SIC Code: <i>26</i>	8. Acid Rain Unit? <i>[NO]</i>
9. Emissions Unit Comment: (Limit to 500 Characters)			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):
None

2. Control Device or Method Code(s): *None*

Emissions Unit Details

1. Package Unit: <i>NA</i>	Model Number: <i>NA</i>
Manufacturer: <i>NA</i>	
2. Generator Nameplate Rating: <i>NA</i>	MW
3. Incinerator Information:	
Dwell Temperature: <i>NA</i>	°F
Dwell Time: <i>NA</i>	seconds
Incinerator Afterburner Temperature: <i>NA</i>	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: <i>NA</i>	mmBtu/hr
2. Maximum Incineration Rate: <i>NA</i> lb/hr	tons/day
3. Maximum Process or Throughput Rate: <i>NA</i>	
4. Maximum Production Rate: <i>NA</i>	
5. Requested Maximum Operating Schedule:	
24 hours/day	7 days/week
52 weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code: <i>NA</i>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): <i>NA</i>			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): <i>Not Classified</i>		
2. Source Classification Code (SCC): <i>3-07-001-99</i>		3. SCC Units: <i>NA</i>
4. Maximum Hourly Rate: <i>NA</i>	5. Maximum Annual Rate: <i>NA</i>	6. Estimated Annual Activity Factor: <i>NA</i>
7. Maximum % Sulfur: <i>NA</i>	8. Maximum % Ash: <i>NA</i>	9. Million Btu per SCC Unit: <i>NA</i>
10. Segment Comment (limit to 200 characters): <i>Causticizing Area</i>		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
<i>H001</i>	<i>None</i>		<i>NS</i>
<i>H115</i>	<i>None</i>		<i>NS</i>
<i>VOC</i>	<i>None</i>		<i>NS</i>
<i>HAP</i>	<i>None</i>		<i>NS</i>

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
 (Regulated Emissions Units -
 Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions *See attached application narrative*

1. Pollutant Emitted:		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		4. Synthetically Limited? [] tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <i>NA</i>		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: NA	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 1

1. Parameter Code: NA	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: Serial Number: Model Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram <input checked="checked" type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested <i>See attached application narrative</i>
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="checked" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="checked" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested <i>See previously submitted Title V and Thermal Oxidizer Permit Applications</i>
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="checked" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="checked" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="checked" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested <i>In-line process. Causticizing Area Startup and Shutdown Procedures are maintained on-site.</i>
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="checked" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested <i>Mill Operation and Maintenance Plans are maintained on-site and are available for agency review.</i>
8. Supplemental Information for Construction Permit Application <input checked="checked" type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <i>See attached application narrative</i>
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="checked" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <i>Bleach Plant Operations</i>			
4. Emissions Unit Identification Number: ID: <i>050 and 051</i>			
		<input type="checkbox"/> No ID <input type="checkbox"/> ID	
5. Emissions Unit Status Code: <i>A</i>	6. Initial Startup Date: <i>1985</i>	7. Emissions Unit Major Group SIC Code: <i>26</i>	8. Acid Rain Unit? <i>[NO]</i>
9. Emissions Unit Comment: (Limit to 500 Characters)			

Emissions Unit Control Equipment

1.	Control Equipment/Method Description (Limit to 200 characters per device or method): <i>Scrubber (ClO₂)</i>
2.	Control Device or Method Code(s): <i>070</i>

Emissions Unit Details

1.	Package Unit: Manufacturer: <i>SUNDS</i>	Model Number: <i>NA</i>
2.	Generator Nameplate Rating: <i>NA</i> MW	
3.	Incinerator Information:	
	Dwell Temperature: <i>NA</i>	°F
	Dwell Time: <i>NA</i>	seconds
	Incinerator Afterburner Temperature: <i>NA</i>	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: <i>NA</i>	mmBtu/hr
2. Maximum Incineration Rate: <i>NA</i>	lb/hr tons/day
3. Maximum Process or Throughput Rate: <i>888 ADTBP/day (A Line), 830 ADTBP/day (B Line)</i>	
4. Maximum Production Rate: <i>NA</i>	
5. Requested Maximum Operating Schedule:	
<i>24</i> hours/day	<i>7</i> days/week
<i>52</i> weeks/year	<i>8760</i> hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

<i>See attached application narrative.</i>	

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? <i>NA</i>		2. Emission Point Type Code:	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): <i>MC pumps will not contain Emission Points and will not emit regulated air pollutants.</i>			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): <i>Not Classified</i>		
2. Source Classification Code (SCC): <i>3-07-001-99</i>		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
<i>CO</i>	<i>None</i>		<i>NS</i>
<i>VOC</i>	<i>None</i>		<i>NS</i>

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions See attached application narrative

1. Pollutant Emitted:		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		4. Synthetically Limited? [] tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <i>NA</i>		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: <i>NA</i>	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 1

1. Parameter Code: <i>NA</i>	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

<p>1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: _____ [] Not Applicable [] Waiver Requested <i>See attached application narrative</i></p>
<p>2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable [] Waiver Requested</p>
<p>3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable [] Waiver Requested <i>See previously submitted Title V and Thermal Application.</i></p>
<p>4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable [] Waiver Requested</p>
<p>5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable [] Waiver Requested <i>Bleach Plant Area Startup and Shutdown Procedures are maintained on-site in the Control Room..</i></p>
<p>7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable [] Waiver Requested <i>Mill Operation and Maintenance Plans are maintained on-site and are available for agency review.</i></p>
<p>8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: _____ [] Not Applicable <i>See attached application narrative</i></p>
<p>9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>10. Supplemental Requirements Comment:</p>

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <i>Kamyr Digester System (LVHC NCG Handling System)</i></p>			
<p>4. Emissions Unit Identification Number: <input type="checkbox"/> No ID ID: <i>063</i> <input type="checkbox"/> ID</p>			
<p>5. Emissions Unit Status Code: <i>A</i></p>	<p>6. Initial Startup Date: <i>1982</i></p>	<p>7. Emissions Unit Major Group SIC Code: <i>26</i></p>	<p>8. Acid Rain Unit? <i>[No]</i></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> 			

Emissions Unit Control Equipment

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method): <i>Thermal Oxidizer or Lime Kiln</i></p>
<p>2. Control Device or Method Code(s): <i>099</i></p>

Emissions Unit Details

1. Package Unit:	
Manufacturer: <i>Kamyr</i>	Model Number: <i>NA</i>
2. Generator Nameplate Rating: <i>NA</i>	MW
3. Incinerator Information:	
Dwell Temperature: <i>NA</i>	°F
Dwell Time: <i>NA</i>	seconds
Incinerator Afterburner Temperature: <i>NA</i>	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: <i>NA</i>	mmBtu/hr
2. Maximum Incineration Rate: <i>NA</i>	lb/hr tons/day
3. Maximum Process or Throughput Rate: <i>960 ADTUP/day</i>	
4. Maximum Production Rate: <i>NA</i>	
5. Requested Maximum Operating Schedule:	
<i>24</i> hours/day	<i>7</i> days/week
<i>52</i> weeks/year	<i>8760</i> hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code: <i>NA</i>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): <i>NA – Emission Unit is vented to the Thermal Oxidizer or Lime Kiln.</i>			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): <i>Digester/blow tank</i>		
2. Source Classification Code (SCC): <i>3-07-001-01</i>		3. SCC Units: <i>ADTUP</i>
4. Maximum Hourly Rate: <i>40</i>	5. Maximum Annual Rate: <i>350,400</i>	6. Estimated Annual Activity Factor: <i>NA</i>
7. Maximum % Sulfur: <i>NA</i>	8. Maximum % Ash: <i>NA</i>	9. Million Btu per SCC Unit: <i>NA</i>
10. Segment Comment (limit to 200 characters):		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions *See attached application narrative*

1. Pollutant Emitted:		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		4. Synthetically Limited? [] tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <i>NA</i>		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: <i>NA</i>	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 1

1. Parameter Code: <i>NA</i>	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: _____ Model Number: _____ Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested <i>See attached application narrative</i>
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested <i>See previously submitted Title V and Thermal Oxidizer Permit Applications</i>
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested <i>Kamyr Digester System Startup and Shutdown Procedures are maintained on-site in the Control Rooms and the Environmental Office.</i>
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested <i>Mill Operation and Maintenance Plans are maintained on-site and are available for agency review.</i>
8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <i>See attached application narrative</i>
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable