



Jeb Bush  
Governor

# Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

David B. Struhs  
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Dave Stephens  
Plant Manager  
International Paper Company  
P.O. Box 3537  
McDavid, Florida 32568

Re: DEP File No. 0330260-002-AC, Modification of Permit No. PSD-FL-271

International Paper Company, formerly Champion International Corp., applied on December 15, 2000, to the Department for a modification to air construction permit number PSD-FL-271 for its McDavid Lumber Mill located at 401 Champion Drive, McDavid, Escambia County. The modification is to include an after-the-fact case-by-case MACT (Maximum Achievable Control Technology) determination. The Department has reviewed the modification request. The referenced permit is hereby modified as follows:

**ADD:** Facility-Wide Specific Condition No. 28: The permittee shall comply with the attached MACT (Maximum Achievable Control Technology) Determination.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit modification) 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 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

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

"More Protection, Less Process"

Printed on recycled paper.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Received by (Please Print Clearly) _____ B. Date of Delivery <u>8/24/07</u></p> <p>C. Signature <u>[Signature]</u> <input type="checkbox"/> Agent  <input checked="" type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:  Mr. Dave Stephens  Plant Manager  International Paper Company  P.O. Box 3537  McDavid, Florida 32568</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>2. Article Number (Copy from service label)  7000 0600 0021 6524 3608</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

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

Article Sent To:  
Mr. Dave Stephens

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	<b>\$</b>	

Name (Please Print Clearly) (to be completed by mailer)  
Mr. Dave Stephens

Street, Apt. No., or PO Box No.  
P.O. Box 3537

City, State, ZIP+4  
McDavid, Florida 32568

PS Form 3800, July 1999 See Reverse for Instructions

7000 0600 0021 6524 3608

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Received by (Please Print Clearly) _____ B. Date of Delivery _____</p> <p>C. Signature <u>[Signature]</u> <input type="checkbox"/> Agent  <input checked="" type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:  Mr. Dave Stevens  Plant Manager  McDavid Lumber Mill  International Paper Company  401 Champion Drive  McDavid, Florida 32568</p>	<p>3. Service Type  <input 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>2. Article Number (Copy from service label)</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. SCOTT SWS 8/3

2. CLARK CUD

3. HOWARD?

4. [Signature]

5. \_\_\_\_\_

PLEASE PREPARE REPLY FOR:

\_\_\_\_ SECRETARY'S SIGNATURE

\_\_\_\_ DIV/DIST DIR SIGNATURE

\_\_\_\_ MY SIGNATURE

YOUR SIGNATURE

\_\_\_\_ DUE DATE \_\_\_\_\_

ACTION/DISPOSITION

\_\_\_\_ DISCUSS WITH ME

\_\_\_\_ COMMENTS/ADVISE

REVIEW AND RETURN

\_\_\_\_ SET UP MEETING

\_\_\_\_ FOR YOUR INFORMATION

\_\_\_\_ HANDLE APPROPRIATELY

\_\_\_\_ INITIAL AND FORWARD

\_\_\_\_ SHARE WITH STAFF

\_\_\_\_ FOR YOUR FILES

COMMENTS:

FINAL AC AND MACT  
FOR McDAVID LUMBER  
MILL.

Barbara:

Please check copy,  
and send out.

Thanks,  
Cindy

FROM: CINDY PHILLIPS DATE: 8-3-01 PHONE: 1-4534

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this permit modification was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 8/20/01 to the person(s) listed:

Mr. Dave Stephens\*  
Ms. Sandra Veazey, FDEP  
Mr. John Bunyak, NPS  
Mr. Gregg Worley, USEPA Region 4

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.

Barbara J. Friday 8/20/01  
(Clerk) (Date)

Determination of Maximum Achievable Control Technology (MACT)  
International Paper Company  
McDavid Lumber Mill

The applicant, International Paper Company (formerly known as the subsidiary, Champion International Corp.), applied to the Department for an air construction permit on June 15, 1999 to construct and operate a sawmill. A PSD construction permit was issued on September 10, 1999. International Paper Company subsequently learned of research data that indicated the sawmill dryer would be a major source of methanol, a hazardous air pollutant. Therefore, on December 15, 2000, International Paper Company requested the required determination of Maximum Achievable Control Technology (MACT). The primary sources of hazardous air pollutant (HAP) emissions from the facility are the three lumber drying kilns. HAP emissions from the planing and sawing operations are not readily quantifiable. However, it is estimated that methanol and formaldehyde emissions from these processes will each be less than 1.0 ton per year. The facility will be located at 401 Champion Drive, McDavid, Escambia County, Florida.

The estimated annual tonnage of regulated hazardous air pollutants to be emitted is as follows:

Pollutants	Potential Emissions (tons/year)	MACT Threshold Emission Rate (tons/year)
Formaldehyde	2.8	10
Methanol	31.5	10
Total HAPs	34.3	25

Florida Administrative Code Rule 62-204.800(10)(d)2 requires a MACT review for all major sources of HAPs that are to be constructed or reconstructed, unless:

1. the source is specifically regulated or exempted from regulation under a standard issued pursuant to Section 112(d) "emission Standards," Section 112(h) "Work Practice Standards and Other Requirements," or Section 112(j) "Equivalent Emission Limitation by Permit," and incorporated in another subpart of 40 CFR Part 63; or
2. the owner or operator of the major source received an air construction permit for the construction or reconstruction project before July 1, 1997, or the source was constructed or reconstructed before July 1, 1997.

### MACT Determination Requested by the Applicant

International Paper Company performed a data search for other lumber drying kilns in the country to find the best-controlled similar source. A review of EPA's RACT/BACT/LAER clearinghouse revealed no controls on lumber drying kilns. Therefore, the MACT International Paper Company proposed for the lumber kilns, planing and sawing operations, and steam boilers is proper installation, operation, and maintenance.

### MACT Determination Procedure

In accordance with 40 CFR 63 Subpart B, which was adopted in Florida Administrative Code Chapter 62-204, *Maximum Achievable Control Technology (MACT) emission limitation for new sources* means the emission limitation which is not less stringent than the emission limitation achieved by the best controlled similar source, and which reflects the maximum degree of reduction in emissions that the permitting authority, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable by the constructed source.

*Similar source* means a stationary source or process that has comparable emissions and is structurally similar in design and capacity to a constructed or reconstructed source such that the source could be controlled using the same control technology.

In addition, the regulations state that in making the MACT Determination, the Department should give consideration to:

- (a) Any Environmental Protection Agency proposed relevant emission standard pursuant to section 112(d) or section 112(h) of the Act or an adopted presumptive MACT determination for the source category which includes the constructed or reconstructed major source.
- (b) Available information as defined in 40 CFR 63.41.

Though the USEPA has not yet proposed a NESHAP for this source category, MACT for lumber drying kilns is expected to be "no controls".

### MACT Determination

After reviewing the applicant's proposed MACT and conferring with the USEPA and their contractor for this NESHAP source category, the Department has made the determination that Maximum Achievable Control Technology (MACT) for the three lumber drying kilns shall be "no controls" but the lumber drying kilns, as well as the planing and sawing operations and boilers, shall be properly installed, operated and maintained. International Paper Company shall compile operation and maintenance plans

for the lumber drying kilns, planing and sawing operations, and boilers that will focus on procedures relevant to minimizing HAP emissions. These operation and maintenance plans must be kept on site and made available to Department personnel for review when requested. As soon as possible after installation of the equipment is complete, submit to the Department a statement that the equipment was properly installed. This statement must be sealed by a professional engineer registered in the state of Florida.

Details of the Determination may be obtained by contacting:

Cindy L. Phillips, P.E.  
MS 5505, Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida 32399-2400

Recommended by:

Cindy L. Phillips 8/3/01  
Cindy L. Phillips, P.E. Date  
Air Toxics/Title III Section  
Bureau of Air Regulation

C. H. Fancy 8/3/01  
C. H. Fancy, P.E. Date  
Chief  
Bureau of Air Regulation

Approved by:

Howard L. Rhodes 8/16/01  
Howard L. Rhodes, Director Date  
Division of Air Resources  
Management