

**DRAFT**

April 10, 2001

**SENT BY E-MAIL ON 4/11/01**

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

**Re: McDavid Lumber Mill  
DEP File No. 0330260-002-AC (PSD-FL-271)**

Dear Ms. Phillips:

This letter is in response to your correspondence dated January 12, 2001 regarding International Paper Company's Maximum Achievable Control Technology (MACT) permit application for the McDavid Lumber Mill. Responses to the issues raised in your 1/21/01 correspondence are as follows:

**Issue No. 1: Operation and Maintenance Plans**

The equipment operating and maintenance manuals for the lumber kilns, planning and sawing operations, and steam boilers are extensive. We are in the process of condensing these manuals into a concise document that will focus on the operating and maintenance procedures relevant to emissions. Once completed, this document will be submitted to the Department for review and comments.

**Issue No. 2: Minor Hazardous Air Pollutant (HAP) Emissions**

HAP emissions from the planning 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.

**Issue No. 3: Boiler Blowdown Pit**

The boiler blowdown pit activity meets the criteria specified in Rule 62210.300(3)(b)1 and therefore qualifies for an exemption from Department permitting procedures. As suggested, we will include this activity as an insignificant emission unit in the Title V Operation Permit application.

Your continued processing of our permit modification request will be appreciated. Please feel free to contact Eric Gilmore at (850) 587-1000 if there are any further questions regarding this request.

Sincerely,

Dave Stevens  
Plant Manager



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
January 12, 2001

David B. Struhs  
Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Dave Stevens  
Plant Manager  
McDavid Lumber Mill  
International Paper Company  
401 Champion Drive  
McDavid, Florida 32568

RE: McDavid Lumber Mill  
DEP File No. 0330260-002-AC, Modification of Permit No. PSD-FL-271  
Request for Additional Information

Dear Mr. Stevens:

On December 15, 2000, the Department received your application to modify Permit No. PSD-FL-271. In order to continue processing your application, the following additional information is requested.

1. The MACT you proposed for the lumber kilns, planing and sawing operations, and steam boilers is "the proper installation, operation, and maintenance." This proposal is acceptable. However, for our files, please submit Operation and Maintenance Plans which describe what "proper" operation and maintenance of the equipment is. In addition, though it will not hold up the processing of this permitting request, when installation of the equipment is complete, please have your professional engineer submit a sealed statement that the equipment was "properly" installed.
2. The application states that in addition to the three lumber drying kilns, "planing and sawing operations will generate minor amounts of HAPs; primarily methanol and formaldehyde." Does the term "minor" equate to the term "insignificant" as defined in Rule 62-213.430(6)(b)3., F.A.C.? If not, please try to quantify the amounts of methanol and formaldehyde emitted so that they can be included in the MACT determination. For example, an estimate such as "< 1 tpy" is acceptable.
3. Since the application states that the boiler blowdown pit with evaporative steam coils is an insignificant emissions source, it should be exempt from construction permitting because the criteria to be an insignificant emissions unit is the same criteria found in Rule 62-210.300(3)(b)1., Generic Emissions Unit Exemption. If the blowdown pit meets this criteria, it can just be listed as an insignificant emissions unit in your subsequent Title V Operation Permit application.

*"More Protection Less Process"*

*Printed on recycled paper.*

International Paper Company  
McDavid Lumber Mill  
January 12, 2001  
Page 2 of 2

If you have any questions concerning this request for additional information, please call me at (850)921-9534, or send e-mail to me at [Cindy.Phillips@dep.state.fl.us](mailto:Cindy.Phillips@dep.state.fl.us).

Sincerely,



Cindy L. Phillips, P.E.  
Bureau of Air Regulation

c: Randy Elgin  
Thomas W. Davis, P.E.

**U.S. Postal Service**  
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INTERNATIONAL  PAPER

401 CHAMPION DRIVE  
McDAVID FL 32568  
PHONE 850 587 1000  
FAX 850 587 1003

December 18, 2000

RECEIVED

DEC 21 2000

BUREAU OF AIR REGULATION

Mr. Joseph Kahn, P.E.  
New Source Review Section  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road, Mail Station #5505  
Tallahassee, Florida 32399-2400

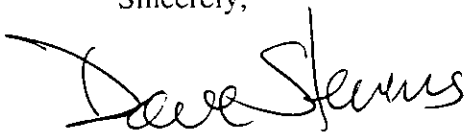
**Re: McDavid Lumber Mill**  
**DEP File No. 0330260-001-AC (PSD-FL-271)**

Dear Mr. Kahn:

This letter is to advise the Department that the company name for the McDavid Lumber Mill has been changed from Champion International Corporation to International Paper Company.

Please feel free to contact me at (850) 587-1002 if there are any further questions regarding this name change.

Sincerely,



Dave Stevens  
Plant Manager

cc: Mr. Ed Middleswart, FDEP - NWD  
Mr. Andrew Allen, FDEP - NWD

*C. Kelly*