

DEC 14 '98

LAW OFFICES  
OERTEL, HOFFMAN, FERNANDEZ & COLE  
A PROFESSIONAL ASSOCIATION

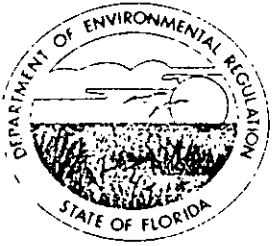
From:  
Terry Cole

Claire,

Attached is the cover page with  
David Buff's certification. The original  
& copies of the entire report with <sup>PE</sup> seals  
is being mailed to you.

Terry

Thanks for all of the time that you,  
Bruce, Steve, Gary and others put into  
this application. TC



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

## FAX TRANSMITTAL LETTER

DATE: 12-13-90

TO:

NAME: Greg Worley (347-2904)  
AGENCY: U.S. EPA, Region IV

TELEPHONE: (404) 347-5207

# OF PAGES (INCLUDE COVER SHEET): 8

FROM:

NAME: Bruce Mitchell

AGENCY: FL DER/DARM/BAR

IF ANY PAGES ARE NOT CLEARLY RECEIVED, PLEASE CALL IMMEDIATELY. PHONE NO. (904) 488-1344

SENDER'S NAME: Bruce Mitchell

COMMENTS: please ✓ for contemporaneous creditable  
emissions (SO<sub>2</sub> based on fuel oil consumption 1/2 % O.S.)  
(see C.2.)

Message Confirmation 12/13/90 Thu 13:48

Term ID: DIV OF AIR RES MGMT P-9999

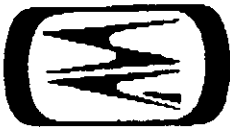
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sheet by  
KKW  
4/12/94





**JSC/COA RECEIVED**

**DEC 12 1990**

**Interoffice Correspondence**

DATE: December 12, 1990

TO: Wayne S. Barlow

**DER-BAQM**

OFFICE:

FROM: Roger Hagan

OFFICE: Fernandina Beach

SUBJECT: Fuel Oil Consumption by  
No. 4 Power Boiler

COPIES: D. Little  
B. Williams  
T. Cole  
R. Cobb

Attached are fuel oil consumption data for No. 4 Power Boiler, from 1980-1989. No data is readily available for 1981, however it should be similar to the figures show for 1980 and 1982.

The No. 4 Power Boiler has historically been the "swing" boiler in the mill due to its size compared to Nos. 5 and 7 Power Boilers, and its use of fuel oil to supplement bark/wood waste. This is the primary reason for the fluctuations shown in fuel consumption. Additionally, those fluctuations mirror closely the various changes in the mill which have affected the steam/power balance. A brief chronology of those changes follow:

- 1980-1982 - Mill operating with three papermachines
- 1983 - No. 7 Power Boiler starts-up
- 1985 - Rebuild of Nos. 3 and 4 papermachines
- 1986 - No. 2 papermachine shut-down
- No. 5 Power Boiler ESP installed
- 1987-1989 - No. 4 Power Boiler operates intermittently or on stand-by

Summary of  
Fuel Oil Consumption  
in Power Boiler No. 4

<u>Year</u>	<u>Gal No. 6 Fuel Oil</u>
1980	11,000,000
1981	No Data Available
1982	9,560,000
1983	5,716,000
1984	1,750,000
1985	4,384,000
1986	764,000
1987	0
1988	99,000
1989	0

CCA Fernandina Mill--Proposed Batch Digester/Washer  
Summary of Calculated Net Emission Increase Per Rule 17-2.500(2)(e)

Regulated Pollutant	Changes in Emissions (TPY)							TOTALS
	PB 4	PB 5	PB 7	RB 4	RB 5	SDT 4	SDT 5	
Particulate (TSP)	-235.4	4.8	5.3	20.6	7.2	4.8	1.9	-190.8
Particulate (PM10)	-186.0	3.0	3.5	15.5	5.4	4.3	1.7	-152.6
Sulfur dioxide	-421.8	67.1	263.6	53.0	64.7	1.3	1.5	29.4
Nitrogen oxides	-195.9	11.5	143.8	24.6	30.1	--	--	14.1
Carbon monoxide	-622.0	0.9	22.0	132.1	161.5	--	--	-305.5
Volatile organic compounds	-55.9	0.13	0.7	10.5	12.8	--	--	-31.8
Lead	-0.06	0.00022	0.0063	0.013	0.010	--	--	-0.03
Mercury	-0.0006	0.00006	0.0019	--	--	--	--	0.0014
Beryllium	-0.0017	0.000015	0.00072	0.00100	0.00077	--	--	0.0008
Arsenic	-0.016	0.00006	0.01	0.0035	0.0026	--	--	0.000
Fluorides	-0.00117	0.00016	2.23	--	--	--	--	2.23
Sulfuric acid mist	-19.4	3.1	12.1	0.69	0.53	--	--	-3.0
Total reduced sulfur	--	--	--	0.36	0.40	0.51	0.03	2.01*
Asbestos	--	--	--	--	--	--	--	0.0
Vinyl Chloride	--	--	--	--	--	--	--	0.0

\*Includes 0.71 TPY TRS from proposed brown stock washer.

EMISSION REDUCTIONS -- POWER BOILER NO. 4

Base actual emissions on last 2 years (1985 - 1986) of sustained boiler operation.

A. Particulate Matter (TSP)

1986 - Stack tests of 2/18/86 and 10/28/86 - 65.8 lb/hr avg  
Operating days = 264

PM = 264 days x 24 hr/day x 65.8 lb/hr / 2,000 lb/ton  
= 208.5 TPY

1985 - Base on 1985 stack test - 75.9 lb/hr  
Operating days = 288

PM = 288 x 24 x 75.9 / 2,000 = 262.3 TPY

Avg. = 235.4 TPY

B. PM10

Power Boiler No. 4 was controlled with mechanical collectors and fly ash injection. AP-42 states that PM10 is 79% of PM emissions.  
235.4 TPY x 0.79 = 186.0 TPY

C. SO<sub>2</sub>

1. Bark/Wood

Avg. = 78,367 tons/yr burned  
Dry basis--moisture 50% -- 78,367 x 0.5 = 39,183.5 tons  
AP-42: 0.4 lb/ton dry  
39,183.5 tons x 0.4 lb/ton / 2,000 = 7.8 TPY

2. Fuel Oil

1986 - 764,000 gal @ 2.5% S  
1985 - 4,384,000 gal @ 1.97% S  
AP-42: SO<sub>2</sub> = 157 S lb/1,000 gal

1986 - 764,000 x 157(2.5)/1,000 / 2,000 = 149.9 TPY  
1985 - 4,384,000 x 157(1.97)/1,000 / 2,000 = 678.0 TPY  
Avg. = 414.0 TPY

3. Total

7.8 TPY + 414.0 TPY = 421.8 TPY

D. Nitrogen Oxides

1. Fuel Oil Burning

AP-42: 67 lb/10<sup>3</sup> gal  
Average of 2.574x10<sup>6</sup> gal/yr burned  
2.574x10<sup>6</sup> gal x 67/10<sup>3</sup> / 2,000 = 86.2 TPY

2. Bark Burning

From AP-42: 2.8 lb/ton bark

$78,367 \text{ TPY} \times 2.8 \text{ lb/ton} / 2,000 = 109.7 \text{ TPY}$

3. Total

$86.2 + 109.7 = 195.9 \text{ TPY}$

E. Carbon Monoxide

1. Fuel Oil Burning

AP-42: 5 lb/10<sup>3</sup> gal

$2.574 \times 10^8 \text{ gal} \times 5 / 10^3 / 2,000 = 6.4 \text{ TPY}$

2. Bark Burning

From NCASI Technical Bulletin No. 109, September 1980, four wood-waste boilers were tested continuously for CO. Boilers A and C operated at about 140,000 lb/hr steam, which is similar to Power Boiler No. 4 operation. The 1-hour CO tests ranged from 0.31 to 4.0 lb/10<sup>6</sup> Btu and averaged 1.84 lb/10<sup>6</sup> Btu. This average factor was used to calculate actual CO emissions:

$78,367 \text{ tons bark} \times 2,000 \text{ lb/ton} \times 4,250 \text{ Btu/lb}$   
 $= 0.67 \times 10^{12} \text{ Btu/yr}$

$0.67 \times 10^{12} \text{ Btu/yr} \times 1.84 \text{ lb/10}^6 \text{ Btu} / 2,000 = 616.4 \text{ TPY}$

3. Total

$6.4 + 616.4 = 622.8 \text{ TPY}$

F. Volatile Organic Compounds

1. Fuel Oil Burning

AP-42: 0.76 lb/10<sup>3</sup> gal

$2.574 \times 10^8 \text{ gal} \times 0.76 \text{ lb/10}^3 \text{ gal} / 2,000 = 1.0 \text{ TPY}$

2. Bark Burning

AP-42: 1.4 lb/ton bark

$78,367 \text{ TPY} \times 1.4 \text{ lb/ton} / 2,000 = 54.9 \text{ TPY}$

3. Total

$1.0 + 54.9 = 55.9 \text{ TPY}$

G. Lead, Mercury, Beryllium, Arsenic, Fluorides

1. Fuel Oil Burning

From "Toxic Air Pollutant Emission Factors - A Compilation for Selected Air Toxic Compounds and Sources," EPA-450/2-88-006.

a. Lead

Factor is 8.9 lb/10<sup>12</sup> Btu (uncontrolled)

Fuel usage =  $2.574 \times 10^8 \text{ gal}$

Heating value = 145,000 Btu/gal

Heat input =  $2.574 \times 10^8 \times 145,000$

$= 0.373 \times 10^{12} \text{ Btu/yr}$

$$\begin{aligned} \text{Pb} &= 0.373 \times 10^{12} \text{ Btu/yr} \times 8.9 \text{ lb}/10^{12} \text{ Btu} / 2,000 \\ &= 0.0017 \text{ TPY} \end{aligned}$$

b. Mercury

$$\begin{aligned} \text{Factor is } &3.2 \text{ lb}/10^{12} \text{ Btu (controlled by multiclone)} \\ \text{Hg} &= 0.373 \times 10^{12} \times 3.2/10^{12} / 2,000 = 0.00060 \text{ TPY} \end{aligned}$$

c. Beryllium

$$\begin{aligned} \text{Factor is } &2.65 \text{ lb}/10^{12} \text{ Btu (controlled by multiclone)} \\ \text{Be} &= 0.373 \times 10^{12} \times 2.65/10^{12} / 2,000 = 0.00049 \text{ TPY} \end{aligned}$$

d. Arsenic

$$\begin{aligned} \text{Factor is } &9.31 \text{ lb}/10^{12} \text{ Btu (controlled by multiclone)} \\ \text{As} &= 0.373 \times 10^{12} \times 9.31/10^{12} / 2,000 = 0.00174 \text{ TPY} \end{aligned}$$

e. Fluorides

From "Emissions Assessment of Conventional Stationary Combustion Systems, Vol V: Industrial Combustion Sources," EPA-600/7-81-003a.

$$\begin{aligned} \text{Factor is } &2.7 \text{ pg/J} = 6.27 \times 10^{12} \text{ Btu (uncontrolled)} \\ \text{Fl} &= 0.373 \times 10^{12} \times 6.27/10^{12} / 2,000 = 0.00117 \text{ TPY} \end{aligned}$$

2. Bark Burning

All factors based on EPA-600/7-81-003a, for a controlled wood-fired stoker boiler. Emission factor is increased by 50% to account for only multiclone control on boiler.

a. Lead

$$\begin{aligned} \text{Factor is } &50 \text{ pg/J} = 116 \text{ lb}/10^{12} \text{ Btu} \times 1.5 \\ &= 174 \text{ lb}/10^{12} \text{ Btu} \\ 0.67 \times 10^{12} \text{ Btu/yr} &\times 174 \text{ lb}/10^{12} \text{ Btu} / 2,000 = 0.058 \text{ TPY} \end{aligned}$$

b. Mercury

Not measured--no emission factor.

c. Beryllium

$$\begin{aligned} \text{Factor is } &<1 \text{ pg/J, or } <2.3 \text{ lb}/10^{12} \text{ Btu} \times 1.5 \\ &= 3.5 \text{ lb}/10^{12} \text{ Btu} \\ 0.67 \times 10^{12} \text{ Btu/yr} &\times 3.5 \text{ lb}/10^{12} \text{ Btu} / 2,000 \\ &= 0.00117 \text{ TPY} \end{aligned}$$

d. Arsenic

$$\begin{aligned} \text{Factor is } &12 \text{ pg/J} = 27.9 \text{ lb}/10^{12} \text{ Btu} \times 1.5 \\ &= 41.9 \text{ lb}/10^{12} \text{ Btu} \\ 0.67 \times 10^{12} \text{ Btu/yr} &\times 41.9 \text{ lb}/10^{12} \text{ Btu} / 2,000 = 0.014 \text{ TPY} \end{aligned}$$

e. Fluorides

Not measured--no emission factor available.



3. Totals

a. Lead:	0.0017 +	0.058 -	0.060 TPY
b. Mercury:	0.00060 +	0 -	0.00060 TPY
c. Beryllium:	0.00049 +	0.00117 -	0.00166 TPY
d. Arsenic:	0.00174 +	0.014 -	0.0157 TPY
e. Fluorides:	0.00117 +	0 -	0.00117 TPY

H. Sulfuric Acid Mist

Sulfuric acid mist is estimated at 3% of sulfur emissions

$\text{SO}_2 = 421.8 \text{ TPY}$

Sulfur =  $421.8 \times .32/64 = 210.9 \text{ TPY}$

Sulfuric acid mist =  $210.9 \times 98/32 \times 0.03 = 19.4 \text{ TPY}$



Summary of  
Fuel Oil Consumption  
in Power Boiler No. 4

<u>Year</u>	<u>Gal No. 6 Fuel Oil</u>
1980	11,000,000
1981	No Data Available
1982	9,560,000
1983	5,716,000
1984	1,750,000
1985	4,384,000
1986	764,000
1987	0
1988	99,000
1989	0

RECEIVED

ANALYSIS OF CCA CONTRIBUTIONS TO PREDICTED SO<sub>2</sub> EXCEEDANCESDEC 10 1990  
DER-BAOM

The attached Table 1, presented previously to FDER, shows the four highest predicted SO<sub>2</sub> concentrations near ITT Rayonier. Also shown are individual plant contributions to these total predicted concentrations. Presented below the concentration results in the table are three additional items. The first is CCA's percent contribution to the predicted exceedance. CCA's contribution ranges from 17% to 26% of the total concentration and averages 21%, showing that CCA is not the major contributor to the predicted exceedances.

The second item shown is the percent reduction in total SO<sub>2</sub> concentration necessary to achieve the ambient air quality standard of 260 µg/m<sup>3</sup>. These range from 8% to 14% and average 10%. The last item shown is the percent reduction in CCA's total impact for these four cases, resulting from the proposed changes to Power Boiler No. 5 at CCA (i.e., reduction in allowable emissions and increase in stack height). The percent reductions range from 24% to 28% and average 27%. The 27% average reduction in CCA impacts is well above the average 10% reduction required from all sources to achieve compliance with the ambient standard. In each of the four cases, CCA's percent reduction is far greater than the percent reduction necessary to achieve the standard.

Table 1. Contributions to Four Highest Predicted 24-Hour SO<sub>2</sub> Concentrations (μg/m<sup>3</sup>) Near ITT Rayonier

Source	Day 44/1983		Day 283/1983		Day 294/1983		Day 262/1984	
	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed
<b>CCA</b>								
PB No. 5	52	33	35	21	48	29	34	21
Other	26	26	16	16	20	20	14	14
<b>Total</b>	<u>78</u>	<u>59</u>	<u>51</u>	<u>37</u>	<u>68</u>	<u>49</u>	<u>48</u>	<u>35</u>
<b>III</b>	222	222	230	230	221	221	234	234
<b>Gilman</b>	2	2	2	2	2	2	2	2
<b>TOTAL</b>	<u>302</u>	<u>282</u>	<u>283</u>	<u>269</u>	<u>291</u>	<u>273</u>	<u>284</u>	<u>271</u>

Note: Existing = Power Boiler No. 5 at current permitted conditions (2,133 lb/hr SO<sub>2</sub>, 227 ft stack height).  
Proposed = Power Boiler No. 5 at proposed conditions (1,511 lb/hr SO<sub>2</sub>, 257 ft stack height).

Source	Day 44/1983	Day 283/1983	Day 294/1983	Day 262/1984	Average
CCA's Contribution to Exceedance	28%	18%	23%	17%	21%
Overall Percent Reduction Necessary to Achieve Standard of 200 μg/m <sup>3</sup>	14%	8%	11%	8%	10%
Percent Reduction in CCA's Impact Resulting From Changes to Power Boiler No. 5	24%	27%	28%	27%	27%

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION IV  
AIR, PESTICIDES AND TOXICS MANAGEMENT DIVISION  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365  
Fax Number: FTS 257-5207 or (404) 347-5207

FACSIMILE TRANSMISSION SHEET

DATE: 12/6/90 NUMBER OF PAGES (including this sheet) 12  
(preparer must number all pages)

TO: Bruce Mitchell PHONE: (904) 488-1344

ADDRESS: FDER - BUREAU OF AIR REGULATION (404) 488-2579

FROM: GREGG WORLEY PHONE: (404) 347-2904

If the following pages are received poorly, please call Gregg Worley  
at FTS 257- \_\_\_\_\_ or (404) 347- 2904

SPECIAL INSTRUCTIONS FOR RECEIVER: \_\_\_\_\_

Additional information on guidelines regarding  
"do. bottleneaking"

Determinations of Applicability

Code	Reference	Question	Affected Regulation	Determination	Discussion
PSD-147	Memo (Reich to Johnson) 7/28/83	A pulp and paper company is proposing to install a bleaching plant and a larger digester. These units will not cause increased emissions, but emissions from the recovery boiler will increase above significant levels because of this construction. Emissions will remain below maximum design permit levels. Is PSD applicable?	§52.21(b)(2) 45 FR 52718 §52.21(j)(3)	Yes	The recovery boiler's proposed operating rate is higher than that provided by the existing digester capacity, and so any increase in actual emissions from the recovery boiler which results from the increased capacity provided by the larger digester must be considered for PSD applicability. If there is a significant net increase, the PSD requirements should be applied, although the boiler will not have to apply BACT because it will not itself be undergoing a physical change or change in the method of operation.

Subject: PSD Applicability

*Ray Nye*

From: Michael M. Johnston, Chief  
Air Operations Section

RECEIVED

To: Mike Trutna, Chief  
New Source Review Office

AUG 26 Recd

A pulp and paper company is in the process of transferring the mill to a new owner. The new owner is proposing to install a bleaching plant and a larger digester to accommodate market demand for bleached pulp. While the construction of these units do not by itself cause increased emissions, emission from the recovery boiler as a result of this construction activity will increase above the significant levels, but remain below the maximum design permit limits. The company contends that PSD is triggered only if the net emissions increase from the specific modifications alone exceeds the threshold levels, thereby releasing the project from PSD Review.

Region 10 has interpreted the term "net emissions increase" as any significant increase in actual emissions from a physical change or change in the method of operation at a stationary source. In this case, do we look at emissions from the specific modifications themselves or do we look at the overall change in actual emissions from the entire facility? The recovery boiler throughput was limited due to the size of the digester. Although the recovery boiler can accommodate the larger digester, we feel that the physical change and change in method of operation constitutes a modification.

If you have any questions please feel free to contact me or Ray Nye of my staff at (FTS) 399-7154.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON D. C. 20460

4.27

JUL 28 1983

OFFICE OF  
AIR, NOISE AND RADIATION

SUBJECT: PSD Applicability Pulp and Paper Mill

FROM: Director  
Stationary Source Compliance Division  
Office of Air Quality Planning and Standards

TO: Michael M. Johnston, Chief  
Air Operations Section - Region X

Your request dated July 6, 1983, to Mike Trutna concerning a PSD applicability issue has been forwarded to my office for response. Your request concerns a pulp and paper company that is proposing to install a bleaching plant and a larger digester. While the construction of these units does not by itself cause increased emissions, emissions from the recovery boiler as a result of this construction activity will increase above the significance levels, but remain below the maximum design permit levels. Your question, is whether this a major modification under the PSD requirements.

The PSD rules at 40 CFR 52.21(b)(2) define major modifications as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act." Net emissions increase is defined as:

"the amount by which the sum of the following exceeds zero: Any increase in actual emissions from a particular physical change or change in method of operation at a stationary source; and Any other increases and decreases in actual emissions at the source that are contemporaneous with the particular change and are otherwise creditable."

Major modifications are, therefore, determined by examining changes in actual emission levels. Actual emissions are defined as:

"the actual rate of emissions of a pollutant from an emissions unit, as determined in accordance with subparagraph (ii)-(iv) below

- (ii) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the unit actually emitted the pollutant during a two-year period which precedes the particular date and which is representative of normal source operation. The Administrator shall allow the use of a different time period upon a determination that it is more representative of normal source operation. Actual emissions shall be calculated using the units actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.
- (iii) The Administrator may presume that source specific allowable emissions for the unit are equivalent to the actual emissions of the unit.
- (iv) For any emissions unit which has not begun normal operations on the particular date, actual emissions shall equal the potential to emit of the unit on that date."

Since this source has been in operation for some time, subparagraph (iv) does not apply. Your memo indicates that the recovery boiler is subject to a permit limit. Ray Nye of your staff has informed my staff that this permit limit binds the recovery boiler to a level of 0.1 gr/dscf, but does not provide any discussion on the unit's operating rate. The recovery boiler has operated in the past at a rate of 450 tons/day, consistent with existing digester capacity. Although the regulations provide a presumption for the use of allowable emissions when source specific limits are established, the preamble at 45 FR 52718 (August 7, 1980) states that:

"The presumption that Federally enforceable source specific requirements correctly reflect actual operating conditions should be rejected by EPA or a State, if reliable evidence is available which shows that actual emissions differ from the level established in the SIP or permit."

-3-

Therefore, since the recovery boiler could not have operated at a level higher than that provided by the existing digester capacity, any increase in actual emissions at the recovery boiler which will result from the increased capacity provided by the larger digester must be considered for the purposes of PSD applicability.

Once it is determined whether there is a significant net emissions increase (summing the emission increases from the larger digester, new bleaching plant and the increased operation of the recovery boiler) in conjunction with any contemporaneous emission increases and decreases, the PSD requirements should be applied, including BACT and air quality analyses. The regulations at 40 CFR 52.21(j)(3) require that:

"A major modification shall apply best available control technology for each pollutant subject to regulation under the Act for which it would result in a significant net emissions increase at the source. This requirement applies to each proposed emissions unit at which a net emissions increase in the pollutant would occur as a result of a physical change or change in the method of operation in the unit."

Since the recovery boiler itself will not be undergoing a physical change or change in the method of operation, it will not have to apply BACT. However, all emissions increases must undergo air quality analysis and will consume applicable air quality increments.

This response has been prepared with the concurrence of OGC and CPDD. Should you have any questions concerning it, please contact Rich Biondi at 382-2831.

  
Edward E. Reich

cc: Mike Trutna  
Peter Wyckoff  
Dave Rochlin



# CONTAINER CORPORATION OF AMERICA

AN AFFILIATE OF JEFFERSON SMURFIT CORPORATION

**Mill Division**  
NORTH 8TH STREET  
PO BOX 2000  
FERNANDINA BEACH, FL 32034  
TELEPHONE: 904/261-5551

December 3, 1990

Mr. Dale Twachtmann  
Secretary  
Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Container Corporation of America  
Permit Nos. AC 45-181406 and AC 45-181407

Dear Mr. Twachtmann:

As we discussed with you and your staff on November 28, 1990, this will confirm our understanding of the remaining two items to be provided to the Department in order for the Department to issue an Intent to Issue the above referenced permits, and also provide that information.

1. Container will modify its pending applications for air construction permits for the No. 8 batch digester and the brown stock washer to include the following provisions, as previously proposed, for No. 5 power (bark) boiler: reduce allowable percent sulfur in the fuel oil to 2.5%; limit the fuel oil burned to 92,400 gallons per day; and raise existing stack height by thirty (30) feet. It was further agreed that the stack would be raised prior to operation of the No. 8 digester and brown stock washer. A formal modification to the above permit applications is enclosed.
2. Container will provide a calculation of the "net emissions increase" pursuant to Rule 17-2.500(2)(e), FAC, to determine if PSD review is necessary prior to the issuance of construction permits for the No. 8 batch digester and brown stock washer.

Mr. Dale Twachtmann  
December 3, 1990  
Page Two

A summary of the calculations is being completed, and will be delivered to the Department by Thursday, December 6. We are confident the numbers will show that there is no significant "net emissions increase" and therefore that PSD review is not required. We will rigorously follow the procedures set forth in the above referenced rule for calculating "net emissions increase" without regard to existing permit limits.

It is our understanding that the DER will proceed expeditiously to independently resolve any alleged ambient air quality violations with the other contributing facility. It is our further understanding that a letter was to have been sent by the DER to the other contributing facility by Monday December 3rd, with an Order to follow within one week.

If the modified permit applications are approved by the Department, one modeled ambient air quality exceedance will be eliminated. Furthermore, CCA's minor contribution to the other modeled exceedance will be significantly reduced.

We appreciate you, Steve Smallwood and Dan Thompson giving the expeditious issuance of these permits your personal attention.

Sincerely,



Wayne Barlow  
Vice President and  
General Manager

WB/jcb  
Attachment

cc: Steve Smallwood - FDER, Tallahassee

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

IN RE: )  
 )  
CONTAINER CORPORATION OF AMERICA )  
 )  
 )

DER FILE NOS: AC 45-181406  
AC 45-181407

---

MODIFICATION OF CONSTRUCTION PERMIT APPLICATIONS

CONTAINER CORPORATION OF AMERICA modifies the above applications, currently pending at DER, in the following fashion. It understands that the incorporation of the modification into a condition of the construction permit makes the condition federally enforceable on the affected sources.

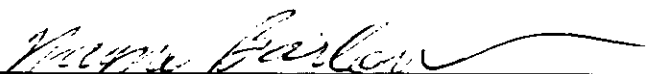
1. Container Corporation of America is limited to the use of oil of a maximum sulfur content of 2 1/2% for the No. 5 Power (Bark) Boiler. The maximum amount of such fuel that can be used in a 24 hour calendar day shall not exceed 92,400 gallons.

2. Container Corporation of America shall raise the height of the stack on Power Boiler No. 5 by 30 feet. This shall be completed prior to operation of either batch digester No. 8 or the proposed brown stock washer. A certificate of completion shall be furnished to the DER District Office. Container Corporation of America agrees to allow the incorporation of this condition in the DER operation permit for Power Boiler No. 5, which shall be considered a federally enforceable condition.

3. Container Corporation of America agrees to surrender the existing operating permit for its No. 4 Power Boiler prior to operating either batch digester No. 8 or the proposed brown stock washer.

Respectfully submitted,

CONTAINER CORPORATION OF AMERICA

  
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Wayne Barlow  
Vice President and General Manager  
Fernandina Beach Mill