

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION
INTEROFFICE MEMORANDUM

Routing To District Offices And/Or To Other Than The Addressee			
To: _____	Loctn.: _____		
To: _____	Loctn.: _____		
To: _____	Loctn.: _____		
From: _____	Date: _____		
Reply Optional []	Reply Required []	Info. Only []	
Date Due: _____	Date Due: _____		

RECEIVED
DEC 7 1984

TO: Victoria J. Tschinkel
FROM: C.H. Fancy, Deputy Chief, BAQM
DATE: December 7, 1984
SUBJECT: Approval and signature of an amendment to the construction permit, No. AC 45-35532, for Container Corporation of America, issued March 12, 1981.

Office of the Secretary
C. H. Fancy

Enclosed is an amendment to the referenced construction permit and the bureau recommends approval.

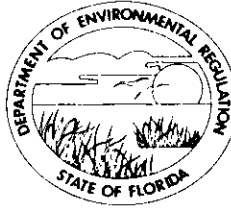
CHF/BM/rw

enclosure

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

December 7, 1984

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom V. Brown
Vice President and Resident Manager
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

Dear Mr. Brown:

RE: Amendment to Construction Permit: AC 45-35532

The Department is in receipt of Mr. David R. James' letter, dated August 21, 1984, which requested a ruling on the application of Specific Condition No. 3, as contained in the above referenced permit. The emission standard that would be applicable, in reviewing the CEM (continuous emission monitor) requirement pursuant to 40 CFR 60.45(a) and (b), Subpart D, is 40 CFR 60.44 (a)(3). In order to clarify the Specific Condition, the following shall be changed and added:

Specific Condition No. 3:

From: Based on the New Source Performance Standard, 40 CFR 60.45(a) and (b), as reference by 17-2.21(2)(a), the applicant shall install, calibrate, maintain, and operate continuous monitoring systems for measuring the opacity of emissions, nitrogen oxides emissions, and either oxygen or carbon dioxide, except as provided in 40 CFR 60.45(b).

To: Based on the New Source Performance Standard, 40 CFR 60.45(a) and (b), as referenced by 17-2.21(2)(a), the applicant shall install, calibrate, maintain, and operate continuous monitoring systems for measuring the opacity of emissions, nitrogen oxides emissions, and

Mr. Tom Brown
Page Two
December 7, 1984

either oxygen or carbon dioxide, except as provided in 40 CFR 60.45(b). Based on the fuel being combusted, the emission standard for nitrogen oxides to be used in applying 40 CFR 60.45(a) and (b) shall be in accordance with 40 CFR 60.44(a)(3), which allows a maximum of 300 nanograms per joule heat input (0.70 lb per million Btu) derived from solid fossil fuel or solid fossil fuel and wood residue (except lignite or a solid fossil fuel containing 25 percent, by weight, or more of coal refuse). A change in fuel will require a review of the applicable standard in 40 CFR 60.44.

Attachments to be incorporated:

4. David R. James' letter, dated August 21, 1984.
5. John C. Brown's memo, dated August 27, 1984.

This letter must be attached to your construction permit, AC 45-35532, and shall become a part of that permit.

Sincerely,



Victoria J. Tschinkel
Secretary

VJT/rw

enclosures

cc: James T. Wilburn
John C. Brown
Cynthia L. Sawyer

ATTACHMENT 4

CCA

Container
Corporation
of America

Paper Mill Division

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-5551

August 21, 1984

APW

Mr. John C. Brown Jr., P.E.
Air Section Supervisor
FDER
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Dear Mr. Brown:

I have reviewed your August 14, 1984 letter in which you stated that we are to submit a written request for a ruling by the Department on whether .49 or .42 lb/MMBTU applies to the NO_x continuous monitoring requirement. This letter will serve as that request. I have also sited specific sections of 40 CFR, Part 60, Subpart D that substantiate our position that .49 lb/MMBTU is the appropriate value for our No. 7 Solid Fossil Fuel Boiler.

In accordance with section 60.45 (b)(3), Subpart D, we elected to delay the installation of a continuous NO_x monitor until after the initial performance tests under section 60.8 were completed. Section 60.45 (b)(3) also states that if the owner or operator demonstrates during the performance test that emissions of nitrogen oxides are less than 70 percent of the applicable standards in section 60.44, a continuous monitoring system for measuring nitrogen oxides emissions is not required. Section 60.44 (a)(3) lists .70 lb per million BTU as the applicable standard for solid fossil fuel boilers. Our performance test showed .43 lb per million BTU or 61 percent of the applicable standard sited above. Therefore, a continuous monitoring system for nitrogen oxides is not required.

Based on the above-referenced sections from New Source Performance Standards we anticipate a favorable ruling by the Department on this matter.

Sincerely,

CONTAINER CORPORATION OF AMERICA

David R. James

David R. James
Environmental Engineer

DRJ/jrb

NOTE: Department review indicated
0.48 lb/MMBTU average
JRB

ATTACHMENT 5

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

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Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

NORTHEAST DISTRICT, JACKSONVILLE

TO: Clair Fancy, BAQM

FROM: JB John Brown

DATE: August 27, 1984

SUBJECT: Nassau County - AP
Container Corporation of America
#7 Power Boiler - Permit No. AC45-35532
Ruling on Permit Condition

9/11
Brock - 9/12/84
Please investigate &
draft reply. I am
guilty of holding this one.
Clair

Please review the attached request from Container to determine whether a continuous monitoring system (CEMS) for nitrogen oxides is required on #7 power boiler.

The construction permit was issued based on 0.60 lb/MMBTU allowable emissions for nitrogen oxides. This would suggest the requirement for a continuous monitoring system if more than 0.36 lb/MMBTU nitrogen oxides were observed during performance tests (60.45 (b)(3), Subpart D, CFR). 0.45 lb/MMBTU were observed during performance testing.

The applicant suggests that the applicable standard in 60.44, Subpart D is 0.70 lb/MMBTU and therefore continuous monitoring is required only if 0.49 lb/MMBTU nitrogen oxides were observed during performance testing.

Please note that the applicant is not contesting the 0.60 lb/MMBTU NO_x allowable emissions, but feels that the CEMS should be based on paragraph 60.44(a)(3), Subpart D.

JB:vk

CCA

Container
Corporation
of America

Paper Mill Division

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-5551

APW

August 21, 1984

JACKSONVILLE

Mr. John C. Brown Jr., P.E.
Air Section Supervisor
FDER
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Dear Mr. Brown:

I have reviewed your August 14, 1984 letter in which you stated that we are to submit a written request for a ruling by the Department on whether .49 or .42 lb/MMBTU applies to the NO_x continuous monitoring requirement. This letter will serve as that request. I have also sited specific sections of 40 CFR, Part 60, Subpart D that substantiate our position that .49 lb/MMBTU is the appropriate value for our No. 7 Solid Fossil Fuel Boiler.

In accordance with section 60.45 (b)(3), Subpart D, we elected to delay the installation of a continuous NO_x monitor until after the initial performance tests under section 60.8 were completed. Section 60.45 (b)(3) also states that if the owner or operator demonstrates during the performance test that emissions of nitrogen oxides are less than 70 percent of the applicable standards in section 60.44, a continuous monitoring system for measuring nitrogen oxides emissions is not required. Section 60.44 (a)(3) lists .70 lb per million BTU as the applicable standard for solid fossil fuel boilers. Our performance test showed .43 lb per million BTU or 61 percent of the applicable standard sited above. Therefore, a continuous monitoring system for nitrogen oxides is not required.

Based on the above-referenced sections from New Source Performance Standards we anticipate a favorable ruling by the Department on this matter.

Sincerely,
CONTAINER CORPORATION OF AMERICA

David R. James
David R. James
Environmental Engineer

DRJ/jrb

NOTE: Department review indicated
0.45 lb/MMBTU average
JRB

P167682466

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

PS Form 3800, Apr. 1976

SENT TO		
Tom V. Brown		
STREET AND NO. North Eighth Street		
P.O., STATE AND ZIP CODE Fernandina Beach, FL		
POSTAGE	32034	
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	c
	SPECIAL DELIVERY	c
	RESTRICTED DELIVERY	c
	OPTIONAL SERVICES	
	RETURN RECEIPT SERVICE	
	SHOW TO WHOM AND DATE DELIVERED	c
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	c	
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	c	
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	c	
TOTAL POSTAGE AND FEES	\$	
POSTMARK OR DATE		

PS Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

• SENDER: — Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
 Show to whom and date delivered..... c
 Show to whom, date and address of delivery..... c
 RESTRICTED DELIVERY
 Show to whom and date delivered..... c
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery \$ _____
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Tom V. Brown
 North Eighth Street
 Fernandina Beach, FL 32034

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
P16	7682466	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: Addressee Authorized agent

4. DATE OF DELIVERY: 12/18/84

POSTMARK: GREEN CREEK, FLA. DEC 17 1984 AM

5. ADDRESS (Complete only if requested):

6. UNABLE TO DELIVER BECAUSE:

CLERK'S SIGNATURE: [Signature]

☆ GPO : 1979-300-459