State of Florida DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
То:	Loctn.:	
To:	Loctn.:	
То:	Loctn.:	
	Date:	
Reply Optional		
Date Due:	Date Due:	

25 " of 3T of the oscilarent

	NORTHEAST DISTRICT, JACKSONVILLE	9/ 2/84 63 11:00 AM 11:00 ==
T0:	NORTHEAST DISTRICT, JACKSONVILLE 9 11 Broce Please investige i Clair Fancy, BAOM John Brown John Brown August 27, 1984 Nassau County - AP	93. 7012
FROM: JB	John Brown quilty of holding this	ore. the or
DATE:	August 27, 1984	·
SUBJECT:	Nassau County - AP Container Corporation of America #7 Power Boiler - Permit No. AC45-35532 Ruling on Permit Condition	84 - ⁹⁸

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 oxices. 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 1b/MMBTU nitrogen oxides were observed during performance testing.

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

Paper Mill Division

North Eighth Street Fernandina Beach, Florida 32034 Phone: 904 261-5551

August 21, 1984

GER-LACKSONVILLE

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 1b/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 that 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 1b 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

Environmental Engineer s.

DRJ/jrb

NOTE: Pepadment ruisen indunted C.45 26/MM Bru arrage JAS

0 1:25 PM

Requested that M. James send us a leter to exclude the carented heets from ever boring been blief in the 88.

-: }

 \mathbf{J}_{i}^{-1}