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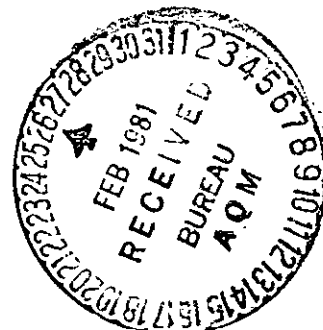
Paper Mill Division

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-5551

February 24, 1981

Mr. Willard Hanks
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301



Re: Proposed Permit for our
#7 Power Boiler

Dear Mr. Hanks:

Our comments on the conditions in the proposed permit for the #7 Power Boiler appear below.

Specific Condition No. 1

Reporting of delays should be required only if the delay would extend completion beyond the expiration date of the construction permit. The second sentence in this condition should be revised to read as follows:

"The applicant shall report to the Department any delays in construction of the project covered by this permit that may delay completion beyond the expiration date set forth herein."

Specific Condition No. 3

The proposed continuous emission monitoring in Specific Condition No. 3 should be revised to track the requirements in the New Source Performance Standards for Fossil-Fuel-Fired Steam Generators, 40 CFR, Part 60, Subpart D. Specifically, NOx emissions should be measured during the initial boiler compliance tests and if NOx emissions are less than 0.49 pounds per million Btus, a continuous monitoring system should not be required. See 40 CFR Section 60.45 (b)(3). Also, as provided in 40 CFR Section 50.45(b)(2), fuel sampling and analysis should be an acceptable alternative to continuous monitoring of sulfur dioxide emissions. A comparison of coal sampling and continuous monitoring is available in a study performed for Tampa Electric Company which was submitted to the FDER as part of TECO's planned fuel conversion at its Gannon generating station.

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Specific Condition No. 3 should therefore be revised to read as follows:

"The applicant shall install, calibrate, maintain, and operate continuous emission monitoring systems for measuring opacity, sulfur dioxide, nitrogen oxides, and either oxygen or carbon dioxide as provided in 40 CFR 60.45(a) and (b), as referenced by 17-2.21(2)(a)."

Specific Condition No. 9

The emission limitation on sulfur dioxide is 1.2 pounds per million Btus. (See Specific Condition No. 10.) There should be no limitation on the sulfur content of the coal beyond that necessary to achieve this limitation. We therefore believe that this condition should be deleted as the necessary monitoring or sampling to demonstrate compliance is provided in Specific Condition No. 3. If the condition is retained, it must be modified. As proposed, the condition limits the sulfur content of the coal to a flat 0.75%. This limitation does not take into account either the heating value of the coal (i.e., as the Btus per pound increase, so should the allowable percent sulfur) or the sulfur that is retained in the flyash. It is the accepted U.S. EPA estimate that 5% of the sulfur in the coal remains in the ash and is not emitted as sulfur dioxide. Therefore, if Specific Condition No. 9 is retained, and we urge that it be deleted, it should be revised to read as follows:

"The maximum sulfur content of the coal shall not exceed that given by the formula: $S = (0.0000632y) \left(\frac{100}{w} \right)$, where S = percent sulfur in the coal, y = Btus/pound coal, and w = percentage of total heat input supplied by coal."

Specific Condition No. 12

Specific Condition No. 12, particularly when read with Specific Condition No. 6 (which requires that an operating permit application be submitted at least 90 days before expiration of the construction permit), does not allow sufficient time to break in the new boiler before shutdown of the other boilers. For offset purposes, U.S. EPA has allowed existing facilities to be operated for up to six months after replacement facilities commence operation. As the new boiler will be much more efficient and cost effective than the facilities to be shutdown, we have a strong interest in putting it to full use as soon as possible and no interest in continuing to use the less efficient facilities. In view of this, there is no necessity for a condition to force their early retirement.

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Therefore, to avoid possible problems in the event of difficulties in bringing the new boiler up to full load, Specific Condition No. 12 should be revised to read as follows:

"As soon as practicable after initial operation of the new boiler, No. 3 recovery boiler and its associated smelt tank and No. 6 power boiler will be retired, and No. 3 power boiler will be put on "cold" standby. The Department will be notified whenever No. 3 power boiler is placed into operation."

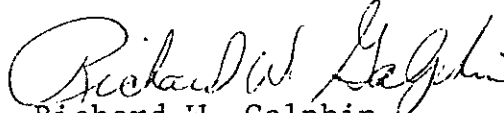
Expiration Date

While we will be making efforts to accelerate completion, at the present time we project that the project may not be complete before March 1983. Since Specific Condition No. 6 would require operation and testing of the boiler at least three months before the expiration date, the expiration date should be no earlier than September 1983. Even if there is no slippage in the construction schedule, this would only allow two months for boiler shakedown and testing before the operating permit application had to be submitted.

In order to expedite the permitting process, if you have any questions, please call.

Sincerely,

CONTAINER CORPORATION OF AMERICA
Fernandina Beach Mill Division


Richard W. Galphin
General Manager

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