

Paper Mill Division

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

December 10, 1980

Mr. Steve Smallwood, Chief Bureau of Air Quality Management Department of Environmental Regulation Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32301

Dear Mr. Smallwood:

In response to your letter of November 6, 1980, emission estimates for our proposed coal handling facility have been calculated and appear on the next page. A typical analysis of oil similar to that which we intend to burn in the new power boiler is included in this transmittal as attachment #1.

Our current plans for a coal handling and delivery system include ten conveyor belt components and the associated transfer points, a secondary coal crusher and two storage silos. Emission rates (see attachment #2) have been estimated using factors developed in EPA-450/3-77-010 "Technical Guidance For Control Of Industrial Process Fugitive Particulate Emissions" March 1977 and "Particulate Emission Factors Applicable To The Iron And Steel Industry" draft report April 5, 1979 prepared for U. S. EPA by Midwest Research Institute. Coal throughout is based on average annual consumption.

If you have any questions, please don't hesitate to call.

Sincerely,

CONTAINER CORPORATION OF AMERICA Fernandina Beach Mill Division

W. M. Kendrick, Technical Director

/bn



## ATTACHMENT #1

## TYPICAL OIL ANALYSIS

VANADIUM, ppm	110
SODIUM, ppm	7.0
MAGNESIUM, ppm	1.4
ASH %	0.03
SULFUR %	2.5
BTU'S/LB.	18,800.0
SP GRAVITY AT 60°F	0.954
NITROCEN %N	0.2

## ESTIMATED EMISSION RATES

į	PROCESS		EMISSION CATEGORY	UNCONTROLLED EMISSION (LB/T MATERIAL HANDLING)	TOTAL NUMBER PROCESSES	TYPE CONTROL	EFF. %	UNCONTROLLED EMISSIONS T/YR*	CONTROLLED EMISSIONS T/YR**
	CONVEYOR/ TRANSFER		A	.0003	10	NONE	0	0.5	
	CONVEYOR/ TRANSFER		В	.0003	10	SURFACTANT SPRAY	73		0.
	CRUSHER		Α	.16	1	NONE	0	26.4	
CR	CRUSHER		В	.16	1	SURFACTANT SPRAY	73		7.1
	COAL PILE		A	.14	1	NONE	0	23.1	
	SILO		В	-	2	ENCLOSED	_		NEG
	RAIL CAR UNLOAD		A	.00002	1	NONE	<b></b>	.003	
i	RAIL CAR UNLOAD		В	.00002	1	SURFACTANT SPRAY	73		.001
		A =	UNCONTROLLE	LD		**************************************	TOT	AL 50.0 T/YR	7.2 T/YF

B = CONTROLLED

<sup>\*</sup> ASSUMES 330,000 TON ANNUAL COAL THROUGHOUT

<sup>\*\*</sup> INCLUDES LOAD IN, LOAD OUT, STORAGE PILE MAINTENANCE AND TRAFFIC, AND WIND EROSION.