SMURFIT-STONE

Fernandina Beach Containerboard Mill
North 8th Street
PO Box 2000
Fernandina Beach, FL 32035

(904) 261-5551
(904) 277-5888 *fax*

CERTIFIED MAIL
7004 0750 0003 3874 1739

RECEIVED
MAY 04 2007
BUREAU OF AIR REGULATION

May 2, 2007

Mr. Jeff Koerner, P. E.
Permitting Administrator
Florida Department of Environmental Protection (FDEP)
2600 Blair Stone Road
Tallahassee, FL 32399

RE: Smurfit-Stone Container Enterprises – Fernandina Beach Mill
Response to Request for Additional Information
Permit Project No. 0890003-019-AC

Dear Mr. Koerner:

On April 11, 2007, Smurfit-Stone Container Enterprises (Smurfit-Stone) received the Department's request for additional information regarding the above referenced permit modification for the mill's No. 7 Power Boiler. The Department's questions are repeated below followed by Smurfit-Stone's response:

1. For the last five shipments of coal received by the mill, provide the analyses of the coal's sulfur content, by weight, and the calculations demonstrating that the sulfur dioxide (SO_2) emissions will not exceed the limit of 1.2 lbs/MMBtu.

Response: The requested information is summarized in the enclosed Table 1. Laboratory analytical results are enclosed for each coal shipment.

2. Have you ever purchased and fired coal in the No. 7 Power Boiler with a sulfur content, by weight, greater than 0.75 percent? If so, please provide documentation and the analyses and dates received.

Response: Since 2003, 25 of 134 shipments of coal have been greater than 0.75 percent sulfur, however none have exceeded the 1.2 lbs SO_2/MMBtu as specified in the Mill's Title V permit during this time. The requested documentation is summarized in the enclosed Table 2.

3. Please detail the procedure used to calibrate the continuous oxygen monitoring system. How often is the oxygen monitor calibrated? Please provide all data and performance curves relating [to] five [combustion?] gas oxygen to carbon monoxide (CO) and nitrogen oxides (NOx) emissions. Please provide the current performance curves or calculations used to demonstrate compliance with the CO and NOx standards?

Response: The oxygen monitor is maintained and calibrated monthly in accordance with the enclosed work instruction. This monitor measures boiler excess oxygen as a surrogate for CO and NOx, and is therefore not a stack emissions monitor. It is located in the economizer section of the boiler. The remaining information requested by the Department is not readily available

and is not germane to Smurfit-Stone's request to clarify the QA/QC requirements for the monitor.

4. Since the oxygen monitor is used to demonstrate compliance with the standards for NOx and CO, when was the last date that the oxygen set points were verified or reestablished? How was this done? Provide all the dates that the oxygen set points were verified or reestablished, and provide the data and the results of these evaluations.

Response: The Oxygen set points were established by permit AO45-169854 based on emissions testing as required by permit PSD-FL-062. The recently renewed Title V permit specifies the criteria for updating these set points.

5. When was the oxygen monitor installed and calibrated? Have any hardware and/or software upgrades been made on the existing oxygen monitoring system since its installation? If so, please describe the upgrades and provide dates that the upgrades were made. Since installation, has the manufacturer of the oxygen monitor been contacted by you to see if any upgrades should be made? If so, please provide correspondence and documentation.

Response: The existing oxygen monitor was installed on 4/06/04 and last calibrated on 5/02/07. No upgrades have been made. This monitor measures boiler excess oxygen and is therefore not a continuous emissions monitor. It serves its intended purpose. There has been no reason to contact the manufacturer.

6. Please provide all of the dates that a relative accuracy test audit (RATA) has been performed on the oxygen monitor since installation, as well as the results of those tests.

Response: A RATA has not been performed on this oxygen monitor. The oxygen monitor is located in the economizer section of the boiler, not in the stack, therefore a RATA is not possible. The purpose of this monitor is to measure boiler oxygen content, as an indicator of combustion. The purpose of a RATA is to compare a stack monitor to stack conditions at specified test port locations, which cannot be met in the economizer section of a boiler. Thus, Smurfit-Stone is requesting that the requirement to comply with 40 CFR 60, Appendix B, PS3 be deleted from the permit as this is an obvious misapplication of this performance specification.

7. In the coal sampling and analysis plan, references are made to an equation to calculate the maximum allowable sulfur (S) content based on the SO_2 limit of 1.2 lbs/MMBTU and the heating value of the coal. That equation is:

$$\%S \text{ (Maximum allowed)} = (6.32 \times 10^{-5}) \times (BTU/lb)$$

How did you arrive at this equation? Please provide a detailed derivation.

Response: The derivation is the reverse of the equation provided in Item 1 above. However a factor of 95% is included here to represent the percentage of coal sulfur that is emitted as SO_2 per AP-42. This factor is not included in the calculations of Item 1 above to provide the mill a safety factor in the coal procurement process.

$$\%S = \frac{1.2 \text{ lbs } SO_2}{\text{MMBtu}} \times \frac{\text{MMBtu}}{10^6 \text{ Btu}} \times \frac{32.1 \text{ lbs S}}{64.1 \text{ lbs } SO_2} \times \frac{\text{lbs coal}}{0.95 \text{ lbs S}} \times \frac{\text{Btu}}{\text{lb coal}} \times 100$$

8. Please provide a summary of all stack tests conducted for CO, NOx and SO_2 emissions, including the corresponding flue gas oxygen content and unit load.

Response: Emissions testing for these pollutants has not been performed in the past 5 years and is not readily available. This information is not germane to Smurfit-Stone's request to clarify the QA/QC requirements for this monitor.

9. Discussions with EPA indicate that it was EPA's intent to establish a maximum sulfur content limit for coal as Best Available Control Technology (BACT). Please comment.

Response: This appears to be contrary to all of the evidence contained in the permitting history. In Attachment A of the March 13, 2007 permit application Smurfit-Stone provided a very detailed explanation of the permitting history of this issue. If it was EPA's intent to establish a maximum sulfur content limit for coal then they would have specified this in the conditions of the PSD permit.

Please contact me at (904) 277-7746 or by email at bcrews@smurfit.com if you have any questions. If these responses do not address all of the Department's concerns, Smurfit-Stone respectfully requests that a meeting be scheduled as soon as possible so that we might attempt to resolve this issue without further written correspondence.

Sincerely,

William O. Crews
Environmental Manager

cc: S. Hamilton, SSCC

CERTIFIED MAIL
7004 0750 0003 3874 1746
Mr. Christopher Kirts, P.E.
District Air Program Administrator
Florida Department of Environmental Protection
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7590

Enclosures

Table 1
No. 7 Power Boiler, Permit Project No. 0890003-019-AC
Response to FDEP Request for Additional Information dated April 11, 2007

Last 7 Shipments of Coal Received

SGS Lab Report Date	Sample Date	Sulfur Content by Weight As Received	Btu/lb As Received	SO2 lbs/MMBtu
4/25/2007	4/21/2007	0.66%	12,933	1.02%
4/4/2007	4/1/2007	0.70%	13,033	1.07%
3/26/2007	3/21/2007	0.66%	13,163	1.00%
3/1/2007	2/24/2007	0.65%	13,127	0.99%
2/20/2007	2/15/2007	0.67%	13,091	1.02%
2/15/2007	2/8/2007	0.67%	13,087	1.02%
2/2/2007	1/27/2007	0.73%	12,848	1.13%
	Average	0.68%	13,058	1.04%

Lab Analysis Reports Attached

Calculations to Demonstrate Compliance w/ 1.2 lbs/Mmbtu limit:

$$\frac{\text{lb SO2}}{\text{Mmbtu}} = \frac{\text{(\%S) lb S}}{\text{100 lb coal}} \times \frac{\text{64.1 lb SO2}}{\text{32.1 lb S}} \times \frac{\text{lb coal}}{\text{(y) Btu/lb}} \times \frac{\text{1,000,000 Btu}}{\text{MMBtu}}$$

(%S) = percent sulfur by weight as received
(y) = Btu/lb as received

April 25, 2007

SMURFIT STONE CONTAINER
MILL DIVISION
P.O. BOX 2000
FERNANDINA FL 32035
ATTN: CORLISS BROWN

Sample identification by
ELK RUN COAL CO.

SAMPLE I.D.: TL M926
FERNANDINA

Kind of sample reported to us COAL

Sample taken at ELK RUN COAL CO.

Sample taken by ELK RUN COAL CO.

Date sampled April 21, 2007

Date received April 22, 2007

Analysis Report No. 61-5411

SHORT PROXIMATE ANALYSIS

	As Received	Dry Basis		
% Moisture	5.83	XXXXX		
% Ash	9.63	10.23		
Btu/lb	12933	13734	MAF	15299
% Sulfur	0.66	0.70		
SO_2 lb/million Btu @ 100%	1.02			
% Chlorine	0.10	0.11		

Respectfully submitted,
SGS NORTH AMERICA INC

R Burke

Charleston Laboratory

SGS

April 25, 2007

SMURFII STONE CONIAINER
MILL DIVISION
P.O. BOX 2000
FERNANDINA FL 32035
AIIN: CORLISS BROWN

Sample identification by
ELK RUN COAL CO.

SAMPLE I.D.: IL M926
FERNANDINA

Kind of sample reported to us COAL

Sample taken at ELK RUN COAL CO.

Sample taken by ELK RUN COAL CO.

Date sampled April 21, 2007

Date received April 22, 2007

Analysis Report No. 61-5411

Mercury Standard Result 0.05 ppm

Respectfully submitted,
SGS NORTH AMERICA INC

R Burke

Charleston Laboratory

April 4, 2007

SMURFIT SIONE CONTAINER
MILL DIVISION
P.O. BOX 2000
FERNANDINA FL 32035.
ATTN: CORLISS BROWN

Sample identification by
ELK RUN COAL CO.

SAMPLE I.D.: TL M925
FERNANDINA

Kind of sample reported to us COAL

Sample taken at ELK RUN COAL CO.

Sample taken by ELK RUN COAL CO.

Date sampled April 1, 2007

Date received April 1, 2007

Analysis Report No. 61-3825

SHORT PROXIMATE ANALYSIS

	As Received	Dry Basis		
% Moisture	5.09	xxxxx		
% Ash	9.78	10.30		
Btu/lb	13033	13732	MAF	15309
% Sulfur	0.70	0.74		
SO_2 lb/million Btu @ 100%	1.07			
% Chlorine	0.09	0.09		

Respectfully submitted,
SGS NORTH AMERICA INC

R Burke
Charleston Laboratory

SGS

April 4, 2007

SMURFII STONE CONTAINER
MILL DIVISION
P.O. BOX 2000
FERNANDINA FL 32035
ATTN: CORLISS BROWN

Sample identification by
ELK RUN COAL CO.

SAMPLE I.D.: TL M925
FERNANDINA

Kind of sample reported to us COAL

Sample taken at ELK RUN COAL CO.

Sample taken by ELK RUN COAL CO.

Date sampled April 1, 2007

Date received April 1, 2007

Analysis Report No. 61-3825

Mercury Standard Result 0.04 ppm

Respectfully submitted
SGS NORTH AMERICA INC

R Baker
Charleston Laboratory

March 26, 2007

SMURFIT STONE CONTAINER
MILL DIVISION
P.O. BOX 2000
FERNANDINA FL 32035
ATTN: CORLISS BROWN

Sample identification by
ELK RUN COAL CO.

SAMPLE I.D.: TL M924
FERNANDINA
75 RAILCARS

Kind of sample reported to us COAL

Sample taken at ELK RUN COAL CO.

Sample taken by ELK RUN COAL CO.

Date sampled March 21, 2007

Date received March 21, 2007

Analysis Report No. 61-3018

SHORT PROXIMATE ANALYSIS

	As Received	Dry Basis		
% Moisture	4.61	xxxxx		
% Ash	9.84	10.32		
Btu/lb	13163	13799	MAF	15387
% Sulfur	0.66	0.69		
SO_2 lb/million Btu @ 100%	1.00			
% Chlorine	0.15	0.16		

Respectfully submitted,
SGS NORTH AMERICA INC

R Burke

Charleston Laboratory

March 26, 2007

SMURFIT STONE CONIAINER
MILL DIVISION
P.O. BOX 2000
FERNANDINA FL 32035
ATTN: CORLISS BROWN

Sample identification by
ELK RUN COAL CO

SAMPLE I.D.: TL M924
FERNANDINA
75 RAILCARS

Kind of sample reported to us COAL

Sample taken at ELK RUN COAL CO.

Sample taken by ELK RUN COAL CO.

Date sampled March 21, 2007

Date received March 21, 2007

Analysis Report No. 61-3018

Mercury Standard Result 0.03 ppm

Respectfully submitted
SGS NORTH AMERICA INC

R Burke

Charleston Laboratory

SGS

March 1, 2007

SMURFIT STONE CONTAINER
MILL DIVISION
P.O. BOX 2000
FERNANDINA FL 32035
ATTN: CORLISS BROWN

Sample identification by
ELK RUN COAL CO.

SAMPLE I.D.: TL M923
FERNANDINA
75 RAILCARS

Kind of sample reported to us COAL

Sample taken at ELK RUN COAL CO.

Sample taken by ELK RUN COAL CO.

Date sampled February 24, 2007

Date received February 25, 2007

Analysis Report No. 61-1207

SHORT PROXIMATE ANALYSIS

	As Received	Dry Basis		
% Moisture	4.07	xxxxx		
% Ash	9.74	10.15		
Btu/lb	13127	13684	**MAF**	15230
% Sulfur	0.65	0.68		
SO_2 lb/million Btu @ 100%	0.99			
% Chlorine	0.09	0.09		

Respectfully submitted,
SGS NORTH AMERICA INC

R Banks

Charleston Laboratory

SGS

March 1, 2007

SMURFIT STONE CONTAINER
MILL DIVISION
P.O. BOX 2000
FERNANDINA FL 32035
ATTN: CORLISS BROWN

Sample identification by
ELK RUN COAL CO.

SAMPLE I.D.: TL M923
FERNANDINA
75 RAILCARS

Kind of sample reported to us COAL

Sample taken at ELK RUN COAL CO.

Sample taken by ELK RUN COAL CO.

Date sampled February 24, 2007

Date received February 25, 2007

Analysis Report No. 61-1207

Mercury Standard Result 0.06 ppm

Respectfully submitted,
SGS NORTH AMERICA INC.

R Barker

Charleston Laboratory

SGS

February 20, 2007

SMURFIT STONE CONTAINER
MILL DIVISION
P.O. BOX 2000
FERNANDINA FL 32035
ATTN: CORLISS BROWN

Sample identification by
ELK RUN COAL CO.

SAMPLE I.D.: TL M922
FERNANDINA

Kind of sample reported to us COAL

Sample taken at ELK RUN COAL CO.

Sample taken by ELK RUN COAL CO.

Date sampled February 15, 2007

Date received February 15, 2007

Analysis Report No. 61-180329

SHORT PROXIMATE ANALYSIS

	As Received	Dry Basis		
% Moisture	4.76	xxxxx		
% Ash	9.73	10.22		
Btu/lb	13091	13745	**MAF**	15310
% Sulfur	0.67	0.70		
SO_2 lb/million Btu @ 100%	1.02			
% Chlorine	0.10	0.10		

Respectfully submitted,
SGS NORTH AMERICA INC.

R Burke

Charleston Laboratory

SGS

February 20, 2007

SMURFIT STONE CONTAINER
MILL DIVISION
P.O. BOX 2000
FERNANDINA FL 32035
ATTN: CORLISS BROWN

Sample identification by
ELK RUN COAL CO.

SAMPLE I.D.: IL M922
FERNANDINA

Kind of sample reported to us COAL

Sample taken at ELK RUN COAL CO.

Sample taken by ELK RUN COAL CO.

Date sampled February 15, 2007

Date received February 15, 2007

Analysis Report No. 61-180329

Mercury Standard Result 0.05 ppm

Respectfully submitted,
SGS NORTH AMERICA INC

R Burke

Charleston Laboratory

SGS

February 2, 2007

SMURFIT STONE CONTAINER
MILL DIVISION
P.O. BOX 2000
FERNANDINA FL 32035
ATTN: CORLISS BROWN

Sample identification by
GOALS

SAMPLE I.D.: TL M940
FERNANDINA

Kind of sample reported to us COAL

Sample taken at GOALS

Sample taken by GOALS

Date sampled January 27, 2007

Date received January 30, 2007

Analysis Report No. 61-179202

SHORT PROXIMATE ANALYSIS

	As Received	Dry Basis		
% Moisture	6.17	xxxxx		
% Ash	9.84	10.49		
Btu/lb	12848	13693	**MAF**	15298
% Sulfur	0.73	0.78		
SO_2 lb/million Btu @ 100%	1.14			
% Chlorine	0.09	0.10		

Respectfully submitted,
SGS NORTH AMERICA INC

R Barker

Charleston Laboratory

SGS

February 2, 2007

SMURFIT STONE CONIAINER
MILL DIVISION
P.O. BOX 2000
FERNANDINA FL 32035
AIIN: CORLISS BROWN

Sample identification by GOALS

SAMPLE I.D.: IL M940
FERNANDINA

Kind of sample reported to us COAL

Sample taken at GOALS

Sample taken by GOALS

Date sampled January 27, 2007

Date received January 30, 2007

Analysis Report No. 61-179202

Mercury Standard Result 0.09 ppm

Respectfully submitted,
SGS NORTH AMERICA INC

R Barker

Charleston Laboratory

Table 2
No. 7 Power Boiler, Permit Project No. 0890003-019-AC
Response to FDEP Request for Additional Information dated April 11, 2007

Historical Use of Coal over 0.75% Sulfur Content

Train #	Ship Date	% Sulfur As Received	SO2 lb/million BTU @ 100%
M921	1/8/2003	0.77	1.2
M925	2/24/2003	0.76	1.2
M928	3/20/2003	0.77	1.19
M922	7/3/2003	0.76	1.19
M932	10/22/2003	0.76	1.18
M934	11/20/2003	0.76	1.19
M936	12/10/2003	0.78	1.19
M937	12/14/2003	0.76	1.15
M938	12/26/2003	0.77	1.19
Shipments >0.75 in 2003		9	
Total Shipments in 2003		31	

M921	2/2/2004	0.76	1.19
M923	9/11/2004	0.77	1.19
M928	11/6/2004	0.76	1.2
M929	11/18/2004	0.78	1.2
M930	11/30/2004	0.77	1.16
M931	12/6/2004	0.76	1.19
M932	12/9/2004	0.78	1.19
Shipments >0.75 in 2004		7	
Total Shipments in 2004		32	

M923	4/18/2005	0.76	1.14
M928	6/12/2005	0.78	1.19
M937	9/27/2005	0.76	1.2
M938	10/1/2005	0.79	1.2
M940	10/23/2005	0.78	1.19
Shipments >0.75 in 2005		5	
Total Shipments in 2005		32	

M929	1/18/2006	0.77	1.19
M928	10/2/2006	0.76	1.18
M936	12/20/2006	0.76	1.15
M937	12/29/2006	0.76	1.2
Shipments >0.75 in 2006		4	
Total Shipments in 2006		29	

Shipments >0.75 in 2007 YTD	0
Total Shipments in 2007 YTD	10
Total Shipments > 0.75	**25**
Total Shipments	**134**

Smurfit-Stone E & I Dept.

Working Instructions And Data Sheet	LOOP NO. 55FT022 LOOP TAG Name: #7 POWER BOILER OXYGEN ANALYZER
Revised: November 4, 2005 Page: 1 of 1	DATE: _____ E/I TECH Name: _____

YOKOGAWA O2 ANALYZER MODEL Z021C

1. Notify the operator that this instrument will be out of service for test/calibration. Ensure that the loop is in manual control.
2. Place the meas/maint switch to maintenance.
3. Check zero calibration gas bottle to make sure it has gas in it.
4. If ok, press std gas recall key (indicator light comes on)
   (a) Press span (air) key, read setpoint (20.9)
   (b) Press zero key, read zero set point. (this setting is printed on side of gas bottle and should read the same) if readings are correct proceed to step 6.
5. If zero gas bottle is empty, replace with new sample bottle, then.
   (A) Press std gas entry key, which turns on indicator light.
   (B) Press span (air) key which will increase one digit on the display.
   (C) Press zero key, will read preset value, to change to new value press zero key to increase data on display to correct value. (*) display exceeds 2.50 it will automatically return to 0.5.
   (D) Press std gas entry key to turn off the indicator light.
6. Press the cal operation key and insure that the cal light is on.
7. Pass instrument air to the probe and wait until the indication stabilizes. (set air flow to 600ml/min.)
8. Record indication on data sheet.
9. Pass the zero gas to the probe and wait until the indication stabilizes at proper value as indicated on side of bottle. Set flow to 600ml/m. Record indication on data sheet.
10. Return the meas/maint switch to measure.
11. Close valve on the zero gas bottle. Notify the operator to return to service.
12. If at anytime during this procedure an error message appears, or indications are not within tolerance, refer to manufacture manual, repair and repeat this procedure.

ZERO GAS STANDARD ___% VERIFY ZERO GAS STANDARD ON SAMPLE BOTTLE.( ) OK

INPUT	AS FOUND	AS LEFT
20.9% INSTRUMENT AIR	_____	_____
___% ZERO SAMPLE AIR	_____	_____

CHECK FOXBORO ON ANNUAL SHUT DOWN FOR ACCURARCY

		AS FOUND	AS LEFT
MA 4	%02	_____	_____
MA 8	%02	_____	_____
MA 12	%02	_____	_____
MA 16	%02	_____	_____
MA 20	%02	_____	_____

COMPLETE THIS SHEET AND MAKE A COPY AND PLACE IN FILES

Adams, Patty

From: Harvey, Mary
Sent: Thursday, April 12, 2007 8:59 AM
To: Adams, Patty
Subject: FW: Permit Modification Ltr. - Smurfit-Stone Container Enterprises, Inc.

Attachments: Modification LTR - SSCEI - Bill Crews - Permit Project #0890003-019-AC.pdf

Modification LTR - SSCEI - Bil...

-----Original Message-----
From: Forney.Kathleen@epamail.epa.gov [mailto:Forney.Kathleen@epamail.epa.gov]
Sent: Wednesday, April 11, 2007 6:06 PM
To: Harvey, Mary
Subject: Re: Permit Modification Ltr. - Smurfit-Stone Container Enterprises, Inc.

Hi Mary,

We got your email

Thanks,
Katy

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary" <Mary.Harvey@dep.state.fl.us>
04/11/2007 02:31 PM

To: <bcrews@smurfit.com>, Kathleen Forney/R4/USEPA/US@EPA, "Kirts, Christopher" <Christopher.Kirts@dep.state.fl.us>, <DBuff@Golder.com>

cc: "Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us>, "Adams, Patty" <Patty.Adams@dep.state.fl.us>, "Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>, "Mitchell, Bruce" <Bruce.Mitchell@dep.state.fl.us>

Subject: Permit Modification Ltr. - Smurfit-Stone Container Enterprises, Inc.

Adams, Patty

From: Harvey, Mary
Sent: Wednesday, April 11, 2007 4:52 PM
To: Adams, Patty
Subject: FW: Permit Modification Ltr. - Smurfit-Stone Container Enterprises, Inc.

From: Crews, Bill [mailto:BCREWS@SMURFIT.COM]
Sent: Wednesday, April 11, 2007 3:07 PM
To: undisclosed-recipients
Subject: Read: Permit Modification Ltr. - Smurfit-Stone Container Enterprises, Inc.

Your message

To: BCREWS@SMURFIT.COM
Subject:

was read on 4/11/2007 3:07 PM.

Adams, Patty

From: Harvey, Mary
Sent: Wednesday, April 11, 2007 2:57 PM
To: Adams, Patty
Subject: FW: Permit Modification Ltr. - Smurfit-Stone Container Enterprises, Inc.

From: Buff, Dave [mailto:DBuff@GOLDER.com]
Sent: Wednesday, April 11, 2007 2:53 PM
To: undisclosed-recipients
Subject: Read: Permit Modification Ltr. - Smurfit-Stone Container Enterprises, Inc.

Your message

To: DBuff@GOLDER.com
Subject:

was read on 4/11/2007 2:53 PM.

Adams, Patty

From: Harvey, Mary
Sent: Wednesday, April 11, 2007 2:31 PM
To: 'bcrews@smurfit.com'; 'FORNEY.KATHLEEN@EPA.GOV'; Kirts, Christopher; 'DBuff@Golder.com'
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria; Mitchell, Bruce
Subject: Permit Modification Ltr. - Smurfit-Stone Container Enterprises, Inc.
Attachments: Modification LTR - SSCEI - Bill Crews - Permit Project #0890003-019-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: http://www.adobe.com/products/acrobat/readstep.html.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

Adams, Patty

From: Harvey, Mary
Sent: Monday, April 16, 2007 2:14 PM
To: Adams, Patty
Subject: FW: Permit Modification Ltr. - Smurfit-Stone Container Enterprises, Inc.

From: Kirts, Christopher
Sent: Monday, April 16, 2007 2:11 PM
To: Harvey, Mary
Subject: RE: Permit Modification Ltr. - Smurfit-Stone Container Enterprises, Inc.

Received, thank you

-----Original Message-----
From: Harvey, Mary
Sent: Wednesday, April 11, 2007 2:31 PM
To: 'bcrews@smurfit.com'; 'FORNEY.KATHLEEN@EPA.GOV'; Kirts, Christopher; 'DBuff@Golder.com'
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria; Mitchell, Bruce
Subject: Permit Modification Ltr. - Smurfit-Stone Container Enterprises, Inc.

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: http://www.adobe.com/products/acrobat/readstep.html.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 11, 2007

Electronically Sent – Received Receipt Requested

Mr. Bill Crews
Environmental Manager
Smurfit-Stone Container Enterprises, Inc.
Fernandina Beach Mill
North 8th Street
Fernandina Beach, Florida 32034

RE: Request to Modify the No. 7 Power Boiler's Permitted Conditions
Permit Project No. 0890003-019-AC
Existing Permit No. PSD-FL-062

Dear Mr. Crews:

On March 16, 2007, the Department received a request to modify the No. 7 Power Boiler's permitted conditions. The application is incomplete. We have determined that the following additional information is needed in order to continue processing this application package. Please provide all assumptions, calculations, and reference materials, that are used or reflected in any of your responses to the following issues:

1. For the last five shipments of coal received by the mill, provide the analyses of the coal's sulfur content, by weight, and the calculations demonstrating that the sulfur dioxide (SO_2) emissions will not exceed the limit of 1.2 lbs/MMBtu.

2. Have you ever purchased and fired coal in the No. 7 Power Boiler with a sulfur content, by weight, greater than 0.75 percent? If so, please provide documentation and the analyses and dates received.

3. Please detail the procedure used to calibrate the continuous oxygen monitoring system. How often is the oxygen monitor calibrated? Please provide all data and performance curves relating five gas oxygen content to carbon monoxide (CO) and nitrogen oxides (NO_x) emissions. Please provide the current performance curves or calculations used to demonstrate compliance with the CO and NO_x standards.

4. Since the oxygen monitor is used to demonstrate compliance with the standards for NO_x and CO, when was the last date that the oxygen set points were verified or reestablished? How was this done? Provide all of the dates that the oxygen set points were verified or reestablished, and provide the data and the results of these evaluations.

5. When was the oxygen monitor installed and calibrated? Have any hardware and/or software upgrades been made on the existing oxygen monitoring system since its installation? If so, please describe the upgrades and provide dates that the upgrades were made. Since installation, has the manufacturer of the oxygen monitor been contacted by you to see if any upgrades should be made? If so, please provide the correspondence and documentation.

6. Please provide all of the dates that a relative accuracy test audit (RATA) has been performed on the oxygen monitor since installation, as well as the results of those tests.

7. In the coal sampling and analysis plan, references are made to an equation to calculate the maximum allowable sulfur (S) content based on the SO_2 limit of 1.2 lb/MMBTU and the heating value of the coal. That equation is:

$$\%S \text{ (maximum allowed)} = (6.32 \times 10^{-5}) \times (BTU/lb)$$

How did you arrive at this equation? Please provide a detailed derivation.

8. Please provide a summary of all stack tests conducted for CO, NO_x and SO_2 emissions, including the corresponding flue gas oxygen content and unit load.

9. Discussions with EPA indicate that it was EPA's intent to establish a maximum sulfur content limit for coal as Best Available Control Technology (BACT). Please comment.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C., requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please call Bruce Mitchell at (850)413-9198.

Sincerely,

Jeffery F. Koerner, P.E.
Permitting North Administrator
Bureau of Air Regulation

JFK/bm

cc: Bill Crews, Smurfit-Stone Container Enterprises, Inc. (bcrews@smurfit.com)
Kathleen Forney, USEPA Region 4 (Forney.Kathleen@epamail.epa.gov)
Chris Kirts, DEP – NED (Christopher.Kirts@dep.state.fl.us)
David A. Buff, P.E., Golder Associates, Inc. (dbuff@golder.com)