

Florida Department of
Environmental Protection

Memorandum

TO: Trina Vielhauer
THRU: Jeff Koerner *JK*
FROM: Bruce Mitchell *RB*
DATE: January 28, 2008
SUBJECT: Smurfit-Stone Container Enterprises, Inc.
Fernandina Beach Mill
Draft Air Construction Permit - BART Exemption Project
0890003-018-AC

Attached is the Draft Air Construction Permit for the Fernandina Beach Mill located at North 8th Street, Fernandina Beach, Nassau County.

Attachments

TLV/jfk/rbm



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

January 31, 2008

Electronically Sent – Return Receipt Requested

Mr. George Q. Langstaff
V.P., Regional Mill Operations
Smurfit-Stone Container Enterprises, Inc.
Fernandina Beach Mill
North 8th Street
Fernandina Beach, Florida 32034

Re: Draft Permit No. 0890003-018-AC
Smurfit-Stone Container Enterprises, Inc. – Fernandina Beach Mill
BART Exemption Project

Dear Mr. Langstaff:

On February 2, 2007, you submitted an application to satisfy the requirements of Best Available Retrofit Technology (BART) in Rule 62-296.340, Florida Administrative Code, for the eligible units at the facility identified above. On December 21, 2007, the Department received a BART exemption request along with the modeling to support the exemption. Enclosed are the following documents:

- The Technical Evaluation and Preliminary Determination summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit.
- The proposed Draft Permit includes the specific conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permit provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Bruce Mitchell, at 850/413-9198, or the Meteorologist, Tom Rogers, at 850/921-9554.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

TLV/jfk/rbm

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Smurfit-Stone Container Enterprises, Inc.
Fernandina Beach Mill
North 8th Street
Fernandina Beach, Florida 32034

Draft Permit No. 0890003-018-AC
Facility ID No. 0890003
Fernandina Beach Mill
BART Exemption Project
Nassau County, Florida

Authorized Representative:

Mr. George Q. Langstaff, V.P., Regional Mill Operations

Facility Location: The applicant, Smurfit-Stone Container Enterprises, Inc., operates the existing Fernandina Beach Mill, which is located in Nassau County at North 8th Street, Fernandina Beach, Florida.

Project: On February 2, 2007, Smurfit-Stone Container Enterprises, Inc. submitted an application to satisfy the requirements of Best Available Retrofit Technology (BART) in Rule 62-296.340, Florida Administrative Code (F.A.C.), for the eligible units at the facility identified above. On December 21, 2007, the Department received a BART exemption request along with the modeling to support the exemption. The applicant proposes a new sulfur dioxide emissions standard for the No. 5 Power Boiler of 550.0 pounds per hour, 24-hour rolling average, with compliance demonstrated by a continuous emissions monitoring system. An air quality modeling analysis of the BART-eligible units indicates a maximum visibility impairment of 0.495 deciviews to the nearest Class I area (Okefenokee National Wildlife Refuge). This is less than the regulatory threshold of 0.5 deciviews, which exempts the facility from BART review. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212, F.A.C. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above. In addition, electronic copies of these documents are available on the following web site:
<http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S., and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rules 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be postmarked by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by electronic mail with received receipt requested before the close of business on 2/1/08 to the persons listed below.

George Q. Langstaff, Authorized Representative, Smurfit-Stone Container Enterprises, Inc. (glangstaff@smurfit.com)

Rachel Davis, Application Contact, Smurfit-Stone Container Enterprises, Inc. (rgdavis@smurfit.com)

David Buff, P.E. of Record, Golder Associates, Inc. (dbuff@golder.com)

Chris Kirts, Northeast District Office (Cristopher.Kirts@dep.state.fl.us)

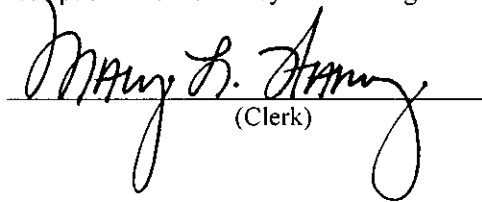
Katy Forney, EPA Region 4 (Forney.Kathleen@epa.gov)

Jim Little, EPA Region 4 (Little.James@epa.gov)

Dee Morse, NPS (Dee_Morse@nps.gov)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)

2/1/08

(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Construction Permit No. 0890003-018-AC
Smurfit-Stone Container Enterprises, Inc. – Fernandina Beach Mill
Nassau County, Florida

Applicant: The applicant for this project is Smurfit-Stone Container Enterprises, Inc. The applicant's authorized representative and mailing address is: Mr. George Q. Langstaff, V.P. - Regional Mill Operations, Smurfit-Stone Container Enterprises, Inc., Fernandina Beach Mill, North 8th Street, Fernandina Beach, Florida 32034.

Facility and Location: The applicant, Smurfit-Stone Container Enterprises, Inc., operates the existing Fernandina Beach Mill, which is located in Nassau County at North 8th Street in Fernandina Beach, Florida. This facility is a Kraft pulp and paper mill that consists of major activities areas such as: wood yard, pulp mill, recycle plant, chemical recovery, powerhouse, paperboard mill, and a corrugated containers plant.

Project: On February 2, 2007, Smurfit-Stone Container Enterprises, Inc. submitted an application to satisfy the requirements of Best Available Retrofit Technology (BART) in Rule 62-296.340, Florida Administrative Code (F.A.C.), for the existing Fernandina Beach Mill. On December 21, 2007, the Department received a BART exemption request along with the modeling to support the exemption. The applicant proposes a new sulfur dioxide emissions standard for the No. 5 Power Boiler of 550.0 pounds per hour, 24-hour rolling average, with compliance demonstrated by a continuous emissions monitoring system. An air quality modeling analysis of the BART-eligible units indicates a maximum visibility impairment of 0.495 deciviews to the nearest Class I area (Okefenokee National Wildlife Refuge). This is less than the regulatory threshold of 0.5 deciviews, which exempts the facility from BART review.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-212, F.A.C. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

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Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be postmarked by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

Smurfit-Stone Container Enterprises, Inc.
Fernandina Beach Mill
Facility ID No. 0890003
Nassau County

Air Construction Permit
Draft Air Construction Permit No. 0890003-018-AC
No. 5 Power Boiler
Best Available Retrofit Technology (BART)

Permitting Authority
Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
New Source Review Section

TECHNICAL EVALUATION & PRELIMINARY DETERMINATION

I. APPLICATION INFORMATION.

A. Applicant Name and Address:

Smurfit-Stone Container Enterprises, Inc.
Fernandina Beach Mill
North 8th Street
Fernandina Beach, Florida 32034

B. Reviewing and Process Schedule:

02/02/07	Department received the BART application for an air pollution construction permit.
03/02/07	Department requested additional information (RAI).
05/08/07	Department letter granting a 30-day extension to reply to the RAI.
06/29/07	Department grants an additional time of 7 days to respond to the RAI.
07/09/07	Department received additional information.
07/30/07	Department requested additional information.
10/16/07	Department received additional information.
12/21/07	Department received BART exemption submittal; application deemed complete.

II. FACILITY INFORMATION.

A. Facility Location

The existing pulp and paper mill is located at North 8th Street in Fernandina Beach, Nassau County, Florida. The UTM coordinates of this facility are: Zone 17; 456.2 km East; and, 3394.1 km North.

B. Standard Industrial Classification Codes (SIC):

Major Group No.	26	Paper and Allied Products
Group Nos.	263	Paperboard Mills
	265	Corrugated and Solid Fiber Boxes
Industry Nos.	2631	Paperboard Mills
	2653	Corrugated and Solid Fiber Boxes

C. Facility Category

The Fernandina Beach Mill is classified as a major air pollutant emitting facility and is a Title V facility. This facility is a Kraft pulp and paper mill that consists of major activities areas such as: wood yard, pulp mill, recycle plant, chemical recovery, powerhouse, paperboard mill, and a corrugated containers plant.

D. Regulatory Categories

- The mill is a major source of hazardous air pollutants (HAP).
- The mill has no units subject to the acid rain provisions of the Clean Air Act.
- The mill is a Title V major source of air pollution in accordance with Chapter 213, Florida Administrative Code (F.A.C.).
- The mill is a major stationary source in accordance with Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The mill operates units subject to New Source Performance Standards (NSPS) in 40 CFR 60.
- The mill operates units subject to National Emissions Standards for HAP in 40 CFR 63.

III. PROJECT DESCRIPTION.

The applicant applied for an air construction permit to establish an emissions limit for sulfur dioxide (SO₂) for the No. 5 Power Boiler in order for the mill to be exempt from the requirements of Best Available Retrofit Technology (BART) in Rule 62-296.340, F.A.C.

IV. RULE APPLICABILITY.

Pursuant to Section 403.061(35), Florida Statutes, the federal Clean Air Act, and the regional haze regulations contained in Title 40, Part 51 of the Code of Federal Regulations (40 CFR Part 51), Subpart P – Protection of Visibility, the Florida Department of Environmental Protection (Department) is required to ensure that certain sources of visibility impairing pollutants in Florida use BART to reduce the impact of their emissions on regional haze in federal Class I areas. Requirements for individual source BART determinations and for BART exemptions are established in Rule 62-296.340, F.A.C.

Rule 62-296.340(5)(c), F.A.C., states that a BART-eligible source may demonstrate that it is exempt from the requirement for BART determination for all pollutants by performing an individual source attribution analysis in accordance with the procedures contained in 40 CFR Part 51, Appendix Y. A BART-eligible source is exempt from BART determination requirements if its contribution to visibility impairment does not exceed 0.5 deciview above natural conditions in any federal Class I area.

A subset of emissions units at the existing mill that are subject to the BART regulations at Rule 62-296.340, F.A.C. These emissions units are:

Source	Emissions Unit No.
No. 5 Power Boiler	006
No. 4 Recovery Boiler	007
No. 4 Smelt Dissolving Tank	013

The applicant conducted an initial modeling analysis that indicated the visibility impairment to the nearest Class I area (Okefenokee National Wildlife Refuge) was over the threshold of 0.5 deciviews. However, the regulations allow the option of obtaining lower federally enforceable emissions standards for BART-eligible units to reduce the predicted visibility impairment below the threshold of 0.5 deciviews, which exempts the facility from BART review. The applicant requested a new limit for the No. 5 Power Boiler of 550.0 pounds per hour of SO₂ emissions based on a 24-hour rolling average as demonstrated by continuous emissions monitoring system. The applicant provided an air quality modeling analysis indicating a visibility impairment of 0.495 deciviews to the Okefenokee National Wildlife Refuge. This level is below the regulatory threshold and allows the Fernandina Beach Mill to avoid a BART determination.

V. CONCLUSION.

Based on the foregoing technical evaluation, the Department has made a preliminary determination that the proposed project will be in compliance with all applicable state and federal air pollution regulations. The proposed permit is attached.

Meteorologists: Cleve Holladay and Tom Rogers

Permit Engineer: Bruce Mitchell

Reviewed and Approved by Jeffery F. Koerner, P.E., Program Administrator, New Source Review Section

DRAFT PERMIT

PERMITTEE

Smurfit-Stone Container Enterprises, Inc.
North 8th Street
Fernandina Beach, Florida 32034

Permit No. 0890003-018-AC
Expires: March 15, 2009
Facility ID No. 0890003
SIC Nos. 2631 and 2653
No. 5 Power Boiler
BART Exemption Project

Authorized Representative:

Mr. George Q. Langstaff, V.P. of Regional Mill Operations

PROJECT AND LOCATION

This permit establishes an enforceable sulfur dioxide (SO₂) emissions limit for the No. 5 Power Boiler, which allows the mill to be exempt from the requirements of Best Available Retrofit Technology (BART) pursuant to Rule 62-296.340, Florida Administrative Code (F.A.C.). The existing Fernandina Beach mill is classified as a major stationary source, a Title V facility and major source of hazardous air pollutants (HAP). The facility is a Kraft pulp and paper mill consisting of the following major activities: wood yard, pulp mill, recycle plant, chemical recovery, powerhouse, paperboard mill and a corrugated containers plant. The existing Fernandina Beach Mill is located at North 8th Street, Fernandina Beach, Nassau County. The UTM Coordinates are: Zone 17; 456.2 km East; and 3394.1 km North.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

CONTENTS

Section 1. Specific Conditions

Section 2. Appendices

Executed in Tallahassee, Florida

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

(Date)

JK/tlv/jfk/bm

SECTION I. SPECIFIC CONDITIONS (DRAFT PERMIT)

NO. 5 POWER BOILER

This permit addresses the following emissions unit.

EU No.	Brief Description
006	<p><i>Description:</i> The No. 5 Power Boiler is a combination boiler that fires more than one fuel. The total maximum operational heat input of this emissions unit is 805 MMBtu/hr. Low volume, high concentration (LVHC) noncondensable gases (NCG) from the batch digester system, continuous digester system, turpentine recovery system, evaporator systems, and foul condensate collection tank are collected and burned in this boiler as the backup control device to the No. 4 Lime Kiln. Hazardous air pollutants emissions are controlled by injecting the gases into the boiler with the primary fuel or into the flame zone of the boiler or with the combustion air.</p> <p><i>Fuel:</i> This unit is authorized to fire carbonaceous fuel (hogged bark and wood waste) and No. 6 fuel oil in any combination. The unit may also fire No. 2 fuel for startup, "on-specification used oil" and incidental amounts of wastewater clarifier wood fiber residuals.</p> <p><i>Controls:</i> Particulate matter emissions, including the fly ash, are first controlled by a bank of multiple cyclones (without fly ash reinjection) followed by an electrostatic precipitator (ESP). The collected fly ash from the ESP is injected into one of the coal pulverizers for the No. 7 power boiler and the bottom ash is sent to the wastewater treatment plant.</p> <p><i>Monitors:</i> The following continuous monitors are required: a continuous opacity monitoring system (COMS); a fuel flow monitor; continuous monitoring of ESP total power (CAM); exhaust flow rate monitor; and a continuous emissions monitoring system (CEMS) for SO₂ emissions.</p> <p><i>Stack Parameters:</i> Exhaust gas exits at 450° F with a volumetric flow rate of 235,000 acfm through a stack that is 11 feet in diameter and 257 feet tall.</p>

GENERAL

1. Compliance Authority. The permittee shall submit all compliance related notifications and reports required by this permit to the Department's Northeast District office at: Department of Environmental Protection, Northeast District Office, Air Resource Section, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590. The telephone number is 904/807-3300 and the facsimile number is 904/448-4366. Notification of compliance testing may be submitted by electronic mail to: NEDAIR@dep.state.fl.us.
2. Appendices. The Appendices attached to this permit are attached as an enforceable part of the permit unless otherwise indicated.
3. Title V Permit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

EMISSION LIMITATION AND STANDARDS

4. SO₂ Standard. Sulfur dioxide emissions shall not exceed 550.0 lb/hour based on a 24-hour rolling average as determined by SO₂ CEMS. Compliance with this standard ensures that the mill is exempt from the provisions of BART at Rule 62-296.340, F.A.C. Failure to comply with the SO₂ standard in this permit may subject this facility to BART review. [Rules 62-4.070(3) and 62-296.340(BART), F.A.C.]

SECTION I. SPECIFIC CONDITIONS (DRAFT PERMIT)

NO. 5 POWER BOILER

COMPLIANCE MONITORING

5. SO₂ CEMS Required for Demonstrating Compliance. The permittee shall properly install, calibrate, maintain and operate a CEMS to measure and record SO₂ emissions and exhaust flow for reporting in units of the applicable standard. The permittee shall comply with the specific requirements in Appendix D of this permit. Within 180 days after issuance of this permit, the CEMS shall be installed, certified and operational in accordance with the applicable performance specifications and demonstrating compliance with the SO₂ standard specified by this permit. [Rules 62-4.070(3) and 62-296.340(BART), F.A.C.]
6. SO₂ CEMS Required for Reporting Annual Emissions. The permittee shall use data from the CEMS when calculating annual emissions for purposes of computing actual emissions, baseline actual emissions and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for purposes of computing emissions pursuant to the reporting requirements of Rules 62-210.370(3) and 62-212.300(1)(e), F.A.C. The permittee shall follow the procedures in Appendix D for calculating annual emissions. [Rules 62-4.070(3) and 62-210.370(3), F.A.C.]

RECORDKEEPING, REPORTING AND NOTIFICATION REQUIREMENTS

7. Other Requirements. For additional recordkeeping, reporting, and notification requirements, see Appendix B (General Conditions), Appendix C (Standard Requirements) and Appendix D (Standard CEMS Requirements).

SECTION 2. APPENDICES

CONTENTS

- Appendix A. Citation Formats
- Appendix B. General Conditions
- Appendix C. Standard Requirements
- Appendix D. Standard CEMS Requirements

SECTION 2. APPENDIX A
CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number
“001” identifies the specific permit project
“AC” identifies the permit as an air construction permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 2. APPENDIX B
GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes (F.S.). The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence

SECTION 2. APPENDIX B
GENERAL CONDITIONS

shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (Not Applicable);
 - b. Determination of Prevention of Significant Deterioration (Not Applicable); and
 - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 2. APPENDIX C
STANDARD REQUIREMENTS

Unless otherwise specified by permit, all emissions units that require testing are subject to the following conditions as applicable.

EMISSIONS AND CONTROLS

1. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
2. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
5. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

{Permitting Note: Rule 62-210.700 (Excess Emissions), F.A.C., cannot vary any NSPS or NESHAP provision.}

RECORDS AND REPORTS

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(3), F.A.C.]

SECTION 2. APPENDIX D
STANDARD CEMS REQUIREMENTS

CEMS OPERATION PLAN

1. CEMS Operation Plan: The permittee shall create and implement a facility-wide plan for the proper installation, calibration, maintenance and operation of each CEMS required by this permit. The permittee shall submit the CEMS Operation Plan to the Bureau of Air Monitoring and Mobile Sources for approval at least 60 days prior to CEMS installation. The CEMS Operation Plan shall become effective 60 days after submittal or upon its approval. If the CEMS Operation Plan is not approved, the permittee shall submit a new or revised plan for approval.

{Permitting Note: The Department maintains both guidelines for developing a CEMS Operation Plan and example language that can be used as the basis for the facility-wide plan required by this permit. Contact the Emissions Monitoring Section of the Bureau of Air Monitoring and Mobile Sources at (850)488-0114.}

INSTALLATION, PERFORMANCE SPECIFICATIONS AND QUALITY ASSURANCE

2. Installation: All CEMS shall be installed such that representative measurements of emissions or process parameters from the facility are obtained. The permittee shall locate the CEMS by following the procedures contained in the applicable performance specification of 40 CFR Part 60, Appendix B.
3. Span Values and Dual Range Monitors: The permittee shall set appropriate span values for the CEMS. The permittee shall install dual range monitors if required by and in accordance with the CEMS Operation Plan.
4. Continuous Flow Monitor: For compliance with mass emission rate standards, the permittee shall install a continuous flow monitor to determine the stack exhaust flow rate. The flow monitor shall be certified pursuant to 40 CFR Part 60, Appendix B, Performance Specification 6.
5. Performance Specifications: The permittee shall evaluate the acceptability of each CEMS by conducting the appropriate performance specification, as follows. CEMS determined to be unacceptable shall not be considered installed for purposes of meeting the timelines of this permit. For the SO₂ monitor, the permittee shall conduct Performance Specification 2 of 40 CFR Part 60, Appendix B.
6. Quality Assurance: The permittee shall follow the quality assurance procedures of 40 CFR Part 60, Appendix F. The required RATA tests for the SO₂ monitor shall be performed using EPA Method 6C in Appendix A of 40 CFR Part 60.
7. Substituting RATA Tests for Compliance Tests: Data collected during CEMS quality assurance RATA tests can substitute for annual stack tests, provided the permittee indicates this intent in the submitted test protocol and follows the procedures outlined in the CEMS Operation Plan.

CALCULATION APPROACH

8. CEMS Used for Compliance: Once adherence to the applicable performance specification for each CEMS is demonstrated, the permittee shall use the CEMS to demonstrate compliance with the applicable emission standards as specified by this permit.
9. CEMS Data: Each CEMS shall monitor and record emissions during all periods of operation and whenever emissions are being generated, including during episodes of startups, shutdowns, and malfunctions. All data shall be used, except for invalid measurements taken during monitor system breakdowns, repairs, calibration checks, zero adjustments and span adjustments.
10. Operating Hours and Operating Days: For purposes of this appendix, the following definitions shall apply. An hour is the 60-minute period beginning at the top of each hour. Any hour during which an emissions unit is in operation for more than 15 minutes is an operating hour for that emission unit. A day is the 24-hour period from midnight to midnight. Unless otherwise specified by this permit, any day with at least one operating hour for an emissions unit is an operating day for that emission unit.
11. Valid Hourly Averages: Each CEMS shall be designed and operated to sample, analyze and record data evenly spaced over the hour at a minimum of one measurement per minute. All valid measurements collected during an hour shall be used to calculate a 1-hour block average that begins at the top of each hour.
 - a. Hours that are not operating hours are not valid hours.

SECTION 2. APPENDIX D
STANDARD CEMS REQUIREMENTS

- b. For each operating hour, the 1-hour block average shall be computed from at least two data points separated by a minimum of 15 minutes. If less than two such data points are available, there is insufficient data, the 1-hour block average is not valid, and the hour is considered as "monitor unavailable."
12. Rolling 24-hour Average: Compliance shall be determined after each valid hourly average is obtained by calculating the arithmetic average of that valid hourly average and the prior 23 valid hourly averages.

MONITOR AVAILABILITY

13. Monitor Availability: The quarterly excess emissions report shall identify monitor availability for each quarter in which the unit operated. Monitor availability for the CEMS shall be 95% or greater in any calendar quarter in which the unit operated for more than 760 hours. In the event the applicable availability is not achieved, the permittee shall provide the Department with a report identifying the problems in achieving the required availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar quarter. Failure to take corrective actions or continued failure to achieve the minimum monitor availability shall be violations of this permit.
14. Notification Requirements: The permittee shall notify the Compliance Authority within one working day of discovering any emissions that demonstrate noncompliance for a given averaging period. Within one working day of occurrence, the permittee shall notify the Compliance Authority of any malfunction resulting in the exclusion of CEMS data. For malfunctions, notification is sufficient for the permittee to exclude CEMS data.

ANNUAL EMISSIONS

15. CEMS Used for Calculating Annual Emissions: All valid data, shall be used when calculating annual emissions.
- a. Annual emissions shall include data collected during startup, shutdown and malfunction periods.
 - b. Annual emissions shall include data collected during periods when the emission unit is not operating but emissions are being generated (for example, when firing fuel to warm up a process for some period of time prior to the emission unit's startup).
 - c. Annual emissions shall not include data from periods of time where the monitor was functioning properly but was unable to collect data while conducting a mandated quality assurance/quality control activity such as calibration error tests, RATA, calibration gas audit or RAA. These periods of time shall be considered missing data for purposes of calculating annual emissions.
 - d. Annual emissions shall not include data from periods of time when emissions are in excess of the calibrated span of the CEMS. These periods of time shall be considered missing data for purposes of calculating annual emissions.
16. Accounting for Missing Data: All valid measurements collected during each hour shall be used to calculate a 1-hour block average. For each hour, the 1-hour block average shall be computed from at least two data points separated by a minimum of 15 minutes. If less than two such data points are available, the permittee shall account for emissions during that hour using site-specific data to generate a reasonable estimate of the 1-hour block average.
17. Emissions Calculation: Hourly emissions shall be calculated for each hour as the product of the 1-hour block average and the duration of pollutant emissions during that hour. Annual emissions shall be calculated as the sum of all hourly emissions occurring during the year.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Tracking Page

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by electronic mail with received receipt requested before the close of business on 2/1/08 to the persons listed below.

~~George Q. Langstaff, Authorized Representative, Smurfit-Stone Container Enterprises, Inc. (glangstaff@smurfit.com)~~

~~Rachel Davis, Application Contact, Smurfit-Stone Container Enterprises, Inc. (rgdavis@smurfit.com)~~

~~David Buff, P.E. of Record, Golder Associates, Inc. (dbuff@golder.com)~~

~~Chris Kirts, Northeast District Office (Cristopher.Kirts@dep.state.fl.us)~~

~~Katy Forney, EPA Region 4 (Forney.Kathleen@epa.gov)~~

~~Jim Little, EPA Region 4 (Little.James@epa.gov)~~

~~Dee Morse, NPS (Dee_Morse@nps.gov)~~

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated agency clerk, receipt of which is hereby acknowledged.

Mary B. Army

(Clerk)

2/1/08

(Date)

Harvey, Mary

From: Davis, Rachel G. [RGDAVIS@SMURFIT.COM]
Sent: Friday, February 01, 2008 12:22 PM
To: Harvey, Mary; Langstaff, George; David Buff, P.E. of Record, Golder Associates, Inc.; Chris Kirts, Northeast District Office; Katy Forney, EPA Region 4; Jim Little, EPA Region 4; Dee Morse, NPS
Cc: Mitchell, Bruce; Koerner, Jeff; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: RE: SMURFIT-STONE CONTAINER ENTERPRISES, INC. - FACILITY #0890003-018-AC-DRAFT - BART EXEMPTION PROJECT

We have received this message and files attached.

Rachel Davis

Environmental Manager
Smurfit Stone Container Corporation
Fernandina Beach Mill
North 8th Street
Fernandina Beach, FL 32034
Phone (904) 277-7718
Cell (904) 753-4595

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Friday, February 01, 2008 11:43 AM
To: Langstaff, George; Davis, Rachel G.; David Buff, P.E. of Record, Golder Associates, Inc.; Chris Kirts, Northeast District Office; Katy Forney, EPA Region 4; Jim Little, EPA Region 4; Dee Morse, NPS
Cc: Mitchell, Bruce; Koerner, Jeff; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: SMURFIT-STONE CONTAINER ENTERPRISES, INC. - FACILITY #0890003-018-AC-DRAFT - BART EXEMPTION PROJECT

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>.

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Thank you,

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Friday, February 01, 2008 1:02 PM
To: Harvey, Mary
Subject: Re: FW: SMURFIT-STONE CONTAINER ENTERPRISES, INC. - FACILITY #0890003-018-AC-DRAFT - BART EXEMPTION PROJECT

thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30303

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

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

02/01/2008 11:45
AM

To
Kathleen Forney/R4/USEPA/US@EPA
cc

Subject
FW: SMURFIT-STONE CONTAINER
ENTERPRISES, INC. - FACILITY
#0890003-018-AC-DRAFT - BART
EXEMPTION PROJECT

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Harvey, Mary
Sent: Friday, February 01, 2008 11:43 AM
To: 'George Q. Langstaff, Authorized Representative, Smurfit-Stone Container Enterprises, Inc.'; 'Rachel Davis, Application Contact, Smurfit-Stone Container Enterprises, Inc.'; 'David Buff, P.E. of Record, Golder Associates, Inc.'; 'Chris Kirts, Northeast District Office'; 'Katy Forney, EPA Region 4'; 'Jim Little, EPA Region 4'; 'Dee Morse, NPS'
Cc: Mitchell, Bruce; Koerner, Jeff; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: SMURFIT-STONE CONTAINER ENTERPRISES, INC. - FACILITY #0890003-018-AC-DRAFT - BART EXEMPTION PROJECT

Dear Sir/Madam:

Harvey, Mary

From: Mitchell, Bruce
Sent: Friday, February 01, 2008 1:50 PM
To: Harvey, Mary
Subject: RE: SMURFIT-STONE CONTAINER ENTERPRISES, INC. - FACILITY #0890003-018-AC-DRAFT - BART EXEMPTION PROJECT
Follow Up Flag: Follow up
Due By: Monday, February 04, 2008 9:00 AM
Flag Status: Red

Thanks, Mary, for handling the permit package. Take care and have a great day and week-end.

Bruce

From: Harvey, Mary
Sent: Friday, February 01, 2008 11:43 AM
To: 'George Q. Langstaff, Authorized Representative, Smurfit-Stone Container Enterprises, Inc.'; 'Rachel Davis, Application Contact, Smurfit-Stone Container Enterprises, Inc.'; 'David Buff, P.E. of Record, Golder Associates, Inc.'; 'Chris Kirts, Northeast District Office'; 'Katy Forney, EPA Region 4'; 'Jim Little, EPA Region 4'; 'Dee Morse, NPS'
Cc: Mitchell, Bruce; Koerner, Jeff; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: SMURFIT-STONE CONTAINER ENTERPRISES, INC. - FACILITY #0890003-018-AC-DRAFT - BART EXEMPTION PROJECT

Dear Sir/Madam:

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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:
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Thank you,

DEP, Bureau of Air Regulation

Please send a "reply" message verifying receipt of the attached document(s); this may be

2/4/2008

Harvey, Mary

From: Buff, Dave [DBuff@GOLDER.com]
Sent: Saturday, February 02, 2008 8:12 PM
To: Harvey, Mary
Subject: RE: SMURFIT-STONE CONTAINER ENTERPRISES, INC. - FACILITY #0890003-018-AC-DRAFT
- BART EXEMPTION PROJECT

David A. Buff, P.E., Q. E. P.
Golder Associates Inc.
Phone: (352)336-5600 x 545
Fax: (352)336-6603 Mobile: (352)514-5600
E-Mail: dbuff@golder.com

Disclaimer Notice:

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From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Friday, February 01, 2008 11:43 AM
To: George Q. Langstaff, Authorized Representative, Smurfit-Stone Container Enterprises, Inc.; Rachel Davis, Application Contact, Smurfit-Stone Container Enterprises, Inc.; Buff, Dave; Chris Kirts, Northeast District Office; Katy Forney, EPA Region 4; Jim Little, EPA Region 4; Dee Morse, NPS
Cc: Mitchell, Bruce; Koerner, Jeff; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: SMURFIT-STONE CONTAINER ENTERPRISES, INC. - FACILITY #0890003-018-AC-DRAFT - BART EXEMPTION PROJECT

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Thank you,

2/4/2008

Harvey, Mary

From: Langstaff, George [GLANGSTA@SMURFIT.COM]
Sent: Wednesday, February 06, 2008 4:28 PM
To: Harvey, Mary
Cc: Davis, Rachel G.
Subject: RE: SMURFIT-STONE CONTAINER ENTERPRISES, INC. - FACILITY #0890003-018-AC-DRAFT - BART EXEMPTION PROJECT

Mary,

As requested, this will confirm our receipt of subject document and I am forwarding a copy to Rachel Davis, our environmental manager. They will review and advise if their are any questions. Feel free to copy her directly on future correspondence with us as that will insure she receives it right away.

Email address is: rgdavis@smurfit.com

Thanks for your support and assistance.

George Langstaff

work Fernandina Mill: (904) 277-5723

cell: (314) 409-1428

glangstaff@smurfit.com

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Wednesday, February 06, 2008 3:08 PM
To: Langstaff, George
Subject: FW: SMURFIT-STONE CONTAINER ENTERPRISES, INC. - FACILITY #0890003-018-AC-DRAFT - BART EXEMPTION PROJECT

Good Afternoon:

This permit was emailed to you on 2/1. Please email me back to let me know that you did receive this permit.

Thanks,
Mary Harvey

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Harvey, Mary
Sent: Friday, February 01, 2008 11:43 AM
To: 'George Q. Langstaff, Authorized Representative, Smurfit-Stone Container Enterprises, Inc.'; 'Rachel Davis, Application Contact, Smurfit-Stone Container Enterprises, Inc.'; 'David Buff, P.E. of Record, Golder

2/6/2008

TO: GEORGE Q. LANGSTAFF, AUTHORIZED REPRESENTATIVE, SMURFIT-STONE CONTAINER ENTERPRISES, INC.