

**NESHAPS SUBPART DDDDD
HEALTH-BASED COMPLIANCE
ALTERNATIVE DEMONSTRATION
FOR
SMURFIT-STONE CONTAINER ENTERPRISES, INC.
*FERNANDINA BEACH MILL
FERNANDINA BEACH, FLORIDA***

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

**Prepared By:
Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500**

September 2006

063-7612

Phillips, Cindy

From: Morris.Mark@epamail.epa.gov
Int: Tuesday, March 06, 2007 11:01 AM
To: Phillips, Cindy
Cc: Holladay, Cleve; AlNahdy, Khalid; Hirtz.James@epamail.epa.gov
Subject: Re: FW: Boiler MACT HBCA Smurfit-Stone Container 06FL

I did review the submittal for 06FL

A review of the modeling did not identify any discrepancies or errors. I didn't scrutinize all the details of the fuel tests. No stack test reports were included in the submittal. I assume the State has copies of these. The location of maximum impact is not a location where people live or congregate. There do appear to be places of residence closer to the source than stated in the submittal, but the assessment included all offsite locations at a resolution of 100 m, so all possible locations are covered. Considering the factor of 2 applied to the emission rates, the maximum rated boiler capacities used in the assessment, and that the highest HI did not occur where people live or congregate, it is likely that the actual HI where people live or congregate is less than 0.5.

We agree with Florida that the rule requires 3 samples for fuel testing. Equation 1 of Appendix A states that fuel testing used to determine emissions must be done according to section 63.7521 of the standards, which requires 3 samples. However, because the 2 samples of bark have a Cl content significantly below that of the bark/sludge, it is unlikely that an additional sample would result in a different conclusion that bark/sludge is the worst-case fuel. Also, the source states that they will be retesting for MACT compliance purposes and will, at that time, do 3 samples. We are not that concerned about this issue.

As stated in earlier email, for a given boiler and fuel type, it seems that if a recent test showed the fraction of Cl emitted as Cl2, that applying that fraction to future fuel test results would be reasonable. I believe the only reason we included the "all Cl2" requirement was to be conservative if there were no information on how much would be emitted as Cl2. But in this case, there does seem to be such info.

Regarding FDEP's question to the source on how they will demonstrate compliance, the source's response seems adequate. There is a general question we might ask ourselves as to how much needs to be put in the form of permit limits when the assessment was done using very conservative inputs. For example, if the assessment is based on a factor of 2 times the 90 % confidence limit fuel content, then monitoring fuel content may seem unnecessary, and maybe only a fuel type change really needs to be monitored.

Regarding the "scaling up" issue we discussed before, we are meeting with OGC today to talk about that.

I have no other issues with this submittal.

Mark Morris
USEPA
Mailcode C539-02
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RTP, NC 27711
(919) 541-5416
morris.mark@epa.gov

"Phillips,
Cindy"
<Cindy.Phillips@
dep.state.fl.us>

03/05/2007 03:58
PM

Mark Morris/RTP/USEPA/US@EPA To
cc
"AlNahdy, Khalid"
<Khalid.Al-Nahdy@dep.state.fl.us>
, "Holladay, Cleve"
<Cleve.Holladay@dep.state.fl.us>
Subject
FW: Boiler MACT HBCA
Smurfit-Stone Container 06FL

Mark, have you had a chance to look at this yet? Khalid's deadline for requesting additional information is Monday March 12th.

Cindy Phillips

-----Original Message-----

From: Phillips, Cindy
Sent: Friday, February 23, 2007 3:02 PM
To: 'Morris.Mark@epamail.epa.gov'
Cc: 'Hirtz.James@epamail.epa.gov'; 'Eddinger.Jim@epamail.epa.gov'; AlNahdy, Khalid; Felton-Smith, Rita
Subject: RE: Boiler MACT HBCA

Mark, it's for 06FL Smurfit-Stone Container Enterprises, Inc. - Fernandina Beach Containerboard Mill. The best I can make out, they only plan to perform fuel testing in the future.

The No. 5 Power Boiler's only control devices are an ESP, multiple cyclone w/o flyash reinjection, and TRS destruction in boiler.

The No. 7 Power Boiler's only control devices are an ESP, water sprays for dust suppression, and chemical stabilizers or wetting agents for dust suppression.

Would you like me to FAX you their response to Khalid AlNahdy's request for additional information? EPA does not appear to have been copied. If you'd like me to FAX it to you, what is your FAX number? (Khalid is the engineer working on this permit revision.)

-Cindy

-----Original Message-----

From: Morris.Mark@epamail.epa.gov [mailto:Morris.Mark@epamail.epa.gov]
Sent: Friday, February 23, 2007 2:41 PM
To: Phillips, Cindy
Cc: Hirtz.James@epamail.epa.gov; Eddinger.Jim@epamail.epa.gov
Subject: Re: Boiler MACT HBCA

Which submittal are you looking at. I want to look at it, too.

Are you saying that they will only do fuel testing in the future, or that they will do

stack testing but not of Cl2? If I were reviewing this (and I probably will be soon), for a given boiler and fuel type, it seems that if a recent test showed the fraction of Cl emitted as Cl2, that applying that fraction to future fuel test results would be reasonable. I believe the only reason we included the "all Cl2" requirement was to be conservative if there were no information on how much would be emitted as Cl2. But in this case, there does seem to be such info. Is there a Cl control device in this case?

Mark Morris
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Mailcode C539-02
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morris.mark@epa.gov

"Phillips,
Cindy"
<Cindy.Phillips@
dep.state.fl.us>

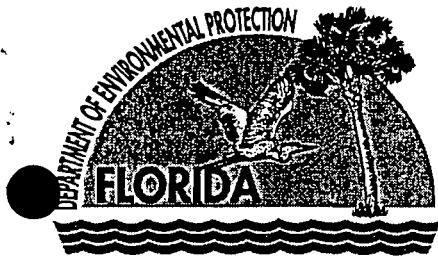
02/23/2007 09:18
AM

Mark Morris/RTP/USEPA/US@EPA To
cc
"AlNahdy, Khalid"
<Khalid.Al-Nahdy@dep.state.fl.us>
, "Felton-Smith, Rita"
<Rita.Felton-Smith@dep.state.fl.u
s>
Subject
Boiler MACT HBCA

Mark, Section 4. (a)(1) of DDDDD Appendix A says "If you are attempting to determine your eligibility for the compliance alternative for HCl, you must test the subpart DDDDD units at your facility for both HCl and Cl2. When conducting fuel analysis, you must assume any chlorine detected will be emitted as Cl2."

Can a facility, instead, perform a hybrid of the two? That is, test initially to see what percentage is actually emitted as Cl2, and then apply that emission factor to future fuel analyses instead of assuming all chlorine will be emitted as Cl2?

-Cindy



Florida
Department of
Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

F A X T R A N S M I T T A L S H E E T

DATE: 2-23-07

TO: MARK MORRIS

PHONE: _____

FAX: 919-541-0840

FROM: CINDY PHILLIPS

PHONE: 850-921-9534

Division of Air Resources Management

FAX: 850.922.6979

RE: SMURFIT-STONE HBCA

CC: _____

Total number of pages including cover sheet: 33

Message

SEE ATTACHED ADDITIONAL INFORMATION.

If there are any problems with this fax transmittal, please call the above phone number.

"Protect, Conserve, and Manage Florida's Environmental and Natural Resources"

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TRANSMISSION VERIFICATION REPORT

TIME : 02/23/2007 15:41
NAME : DIVISION OF AIR
FAX : 8509219533
TEL : 8504880114
SER.# : BROG2J567933

DATE, TIME	02/23 15:33
FAX NO./NAME	619195410840
DURATION	00:08:08
PAGE(S)	33
RESULT	OK
MODE	STANDARD ECM

Golder Associates Inc.

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063-7612
FEB 19 2007

February 1, 2007

Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7590

BUREAU OF AIR REGULATION

RECEIVED

Attention: Mr. Christopher L. Kirts, P.E., District Air Program Administrator

FEB 09 2007

**RE: SMURFIT-STONE CONTAINER ENTERPRISES, INC.
FERNANDINA BEACH MILL
HBCA TITLE V PERMIT REVISION APPLICATION
REQUEST FOR ADDITIONAL INFORMATION**

**NORTHEAST DISTRICT
DEP-JACKSONVILLE**

Dear Mr. Kirts:

Smurfit-Stone Container Enterprises, Inc. (SSCE) has received the Florida Department of Environmental Protection's (FDEP) request for additional information (RAI) dated November 13, 2006 regarding the health-based compliance alternative (HBCA) Title V permit revision application. Each of the FDEP's requests is answered below in the same order as they appear in the RAI letter.

Comment 1. Please state who signed the Compliance Report and Plan/Compliance Certification for Mr. George Q. Langstaff. Has this individual been designated as a Responsible Official pursuant to the requirements of Rule 62-213.202, F.A.C.?

Response: Mr. Mike Holden, the Production Manager, signed the Compliance Report and Plan/Compliance Certification as the Responsible Official in Mr. George Langstaff's absence. The Responsible Official Notification Form, which includes George Langstaff as the Primary Responsible Official and Mike Holden and Stephen Devlin as Additional Responsible Officials, was submitted to the FDEP on March 31, 2006. A copy of the correspondence is included in Attachment A.

Comment 2. Please describe the location where the samples of the solid fuel were collected for the fuel analysis and describe the fuel conveyor system. Please also provide a flow diagram of the fuel conveyor system.

Response: Fuel sampling procedures met the Title 40 Code of Federal Regulations (CFR) Part 63, Subpart DDDDD, Boiler Maximum Achievable Control Technology (MACT) requirements. When sampling from the conveyor belts, the belts were stopped and 6-inch wide (or wider) samples were obtained from the cross-section of the belt. A minimum of three samples were obtained at equal intervals during the testing period.

A flow diagram of the fuel conveyor system showing the fuel sample locations is included in Attachment B. Bark from the de-barking drums and sludge from the sludge press are mixed and ground in the Sludge and Bark Hog. This mixture is then stored in biomass storage until transferred to the No. 5 Power Boiler. The bark/sludge samples were collected from the conveyor belt feeding the No. 5 Power Boiler. Because sludge is not continuously pressed and mixed with bark, bark samples were also collected at the same location.

Coal is brought onsite by rail, then crushed and stored in silos. From the coal bunkers, the coal is pulverized and fed into the No. 7 Power Boiler. Coal samples were obtained from the stopped conveyor

belt exiting the pulverizer. Coal/fly ash samples were obtained from the same location during times when the Mill added fly ash to the pulverized coal. Fly ash samples were collected after the No. 5 Power Boiler electrostatic precipitator and dust collector, but before entering the No. 7 Power Boiler pulverizer.

Comment 3. In Figure 3-2 Receptor Grid Locations, please indicate what are the sensitive receptors (for example, school, daycare, senior community, hospital).

Response: The area covered by the receptor grid in Figure 3-2, Receptor Grid Locations, contains a few sensitive areas, namely schools. A new figure, Figure A in Attachment C, Receptor Grid Locations and Sensitive Areas, has been developed to show the proximity of the sensitive areas to the fence line. The only sensitive receptors are seven schools, identified in the figure, with the nearest school, Saint Michael's Academy, located approximately 500 meters from the fence line.

Comment 4. The mill has proposed a chlorine emissions limit of 0.05 lb/MMBtu with a fuel type of 100% carbonaceous fuel and 0.144 lb/MMBtu as federally enforceable conditions in the Title V permit for the No. 5 Power Boiler and the No. 7 Power Boiler, respectively. Please realize that such permit conditions and limitations will more than likely require compliance demonstrations. Please state how the mill intends to demonstrate compliance with the proposed chlorine emission limits. Furthermore, the mill has indicated that the worse-case fuel for HCl emissions from the No. 5 Power Boiler is the combination of bark/sludge with No. 6 fuel oil. However, such a fuel mix is not proposed as a federally enforceable condition. Please explain. What quantity of bark/sludge and No. 6 fuel oil is fired in the boiler to obtain the worse case fuel as stated in Table 3-1 of the application? What do "Maximum" of bark/sludge and "remainder" of No. 6 fuel oil mean?

Response: SSCE intends to demonstrate compliance with the proposed chlorine emission limits by conducting fuel analyses. Fuel samples will be collected and composited according to the Maximum Available Control Technology (MACT) boiler requirements in Table 6 of 40 CFR 63, Subpart DDDDD. The heat content, moisture content, and chlorine concentration for each composited fuel sample will be determined using the MACT methods. A site-specific test plan will be developed and submitted at least 60 days prior to the fuel sampling, per §63.7521(b) and §63.7520(a), respectively.

Compliance with the chlorine emission limits will be demonstrated with another round of fuel sampling and stack testing to be conducted within 180 days after the Boiler MACT compliance date of September 13, 2007. Once compliance is demonstrated, fuel sampling is only required once every 5 years or when a new type of fuel is burned [§63.7515(f)].

The worst-case fuel burning scenario for chlorine emissions is burning maximum carbonaceous fuel with remainder of No. 6 fuel oil. Under this scenario, the quantity of bark/sludge burned is 25 tons per hour (TPH) and the quantity of No. 6 fuel oil burned is 2,316 gallons per hour (gal/hr). These values are based on 9,137 British thermal units per pound (Btu/lb) for bark/sludge, which is from the January 2005 fuel analysis (see Table A-2, original HBCA application), and 150,257 British thermal units per gallon (Btu/gal) for No. 6 fuel oil, which is from the January 2007 fuel analysis (see Table A-3 in Attachment D).

The current Title V permit allows SSCE to burn carbonaceous fuel and No. 6 fuel oil in any combination, which may include on-spec used oil. The Title V permit also clarifies carbonaceous fuel as bark, wood, sawdust, wastewater wood fiber residuals, and bark ash. Because SSCE is already allowed to burn this fuel mixture, SSCE did not consider it necessary to include this as a federally enforceable condition.

The "maximum" bark/sludge with "remainder" No. 6 fuel oil emission estimation basis for Power Boiler No. 5 is based on the heat inputs for each individual fuel. The maximum heat input for burning any combination of carbonaceous fuel and No. 6 fuel oil is 805 million British thermal units per hour (MMBtu/hr), but the maximum heat input for burning carbonaceous fuel only is 457 MMBtu/hr. Because carbonaceous fuel (i.e., bark/sludge) contains a higher concentration of chlorine than No. 6 fuel oil, the

maximum heat input for carbonaceous fuel burning only was used to calculate the emissions from carbonaceous fuel. The chlorine emissions from No. 6 fuel oil were calculated by subtracting the 457 MMBtu/hr heat input for carbonaceous fuel burning from the maximum permitted heat input of 805 MMBtu/hr for any combination of carbonaceous fuel and No. 6 fuel oil, resulting in 348 MMBtu/hr due to No. 6 fuel oil burning.

Comment 5. The stack information presented in Table 2-2 reflects a heat input rate of 802 MMBtu/hr for the No. 5 Power Boiler. The maximum heat input rate for this boiler for any combination of No. 6 fuel oil and carbonaceous fuel is 805 MMBtu/hr. Please explain why 802 MMBtu/hr was used for the model input. Please explain and provide justification why the operating data presented in this table is different from the information presented in the Title V Renewal application, namely the gas flow rate, velocity, and temperature.

Response: The stack information presented in Table 2-2 contained a typographical error, and has been revised to reflect the correct heat input rate of 805 MMBtu/hr for the No. 5 Power Boiler. The revised table is included in Attachment D and should be inserted into the appropriate location in the original document. No where else in the document was this erroneous heat input used.

While the stack data in Table 2-2 are based on the Title V renewal application (December 2002), the operating data (i.e., gas flow rate, velocity, and temperature) are based on recent stack tests for each power boiler. The operating data for the No. 5 Power Boiler is based on a stack test conducted on January 12, 2005, and the operating data for the No. 7 Power Boiler is based on a stack test conducted on November 10, 2004. These stack test results are considered more representative than data obtained more than 4 years ago. The stack tests for Power Boiler No. 5 and 7 are presented in the original document as Tables A-5 and A-6, respectively. However, an error was discovered in the gas flow rate that was used in the modeling analysis for Power Boiler No. 7. The gas flow rate was corrected to a lower value, and the facility was remodeled. Table 3-3, which presents the maximum predicted chlorine impacts, was revised to reflect the correct flow rate. The revised table, Table 3-3, is also included in Attachment D and should be inserted into the appropriate location in the original document.

Comment 6. The operating data presented in Table 2-2 for the No. 7 Power Boiler is different from the information presented in the Title V Renewal application and the FDEP's historical data for this emissions unit. Please explain and provide justification for the information that was used in the modeling analysis.

Response: Only the stack data (i.e., stack height and diameter) in Table 2-2 are based on the Title V renewal application (December 2002). The operating data (i.e., temperature and gas flow rate) presented in Table 2-2 are based on a stack test that was conducted on November 10, 2004. The operating data in the Title V renewal application were based on a stack test in 2002. A summary of the November 10, 2004 Boiler MACT test results for Power Boiler No. 7 is presented in Table A-6 of the original HBCA application. As stated in the response to Comment 5, the flow rate has been revised to correctly represent the stack test results and the facility was remodeled. The revised impact table, Table 3-3, is included in Attachment D.

Comment 7. Please explain why a safety factor of 2 was applied to the fuel analysis results of the No. 5 Power Boiler bark/sludge and the No. 7 Power Boiler coal? Please explain why a safety factor was not added to the No. 6 fuel oil fuel analysis results.

Response: Because the chlorine content of bark, sludge, and coal can vary somewhat, a conservative safety factor of 2 was applied to the fuel analysis results so that even if higher levels are detected in the future fuel analysis, the boilers will continue to meet the proposed HBCA limits. Even with the safety factor applied, chlorine impacts at SSCE do not exceed the hazard index at the property boundary. No safety factor was applied to the No. 6 fuel oil fuel analysis results since there is little variation in chlorine

Comment 8. 40 CFR 63.7521(b) requires a facility to develop and submit a site-specific fuel analysis plan for review and approval no later than 60 days before the date that the compliance demonstration is intended. The FDEP is not in receipt of such a plan for this mill. Will the mill be submitting the site-specific fuel analysis plan at a later date?

Response: 40 CFR 63.7521(b) requires the submittal of a site-specific fuel analysis plan for compliance purposes. Appendix A of 40 CFR 63, Subpart DDDDD, states that the HBCA demonstration must contain the "fuel analyses for each fuel and emission point which has been conducted including the collection and analytical methods used." The collection and analytical methods were submitted with the HBCA application as Table A-8. SSCE is not aware of any requirement in Appendix A to submit a site-specific fuel analysis plan prior to submittal of the HBCA application. However, SSCE intends to submit a fuel analysis plan according to 40 CFR 63.7521(b) when required to demonstrate compliance with Subpart DDDDD (i.e., within 180 days of September 13, 2007). This site-specific fuel analysis plan will be submitted 60 days prior to conducting the fuel sampling, as required by 40 CFR 63.7521(b)(1).

Comment 9. 40 CFR 63.7521(c) requires that at a minimum, three composite fuel samples for each type of fuel be obtained according to the procedures in 40 CFR 63.7521(c)(1) or (2). It appears from table A-1, that only 2 samples were analyzed of the bark. Please explain.

Response: Appendix A only requires that the fuel sampling and analysis be submitted. The only available bark fuel analysis consisted of two samples. Appendix A does not explicitly state that three composite fuel samples must be obtained for each fuel. Therefore, the two bark samples were considered sufficient and no additional fuel analysis was considered necessary for the HBCA demonstration application. It is anticipated that a formal performance test (fuel sampling and analysis) will be required within 180 days of the compliance date (September 13, 2007), which will require a site-specific test plan per 40 CFR 63.7521(b). Three composite fuel samples will be obtained for the performance test, according to 40 CFR 63.7521(c).

Comment 10. It appears from Table A-3 that the No. 6 fuel oil information is from Perry's Chemical Engineer's Handbook as opposed to being actual fuel oil analysis results. Is this correct? Please explain why site-specific fuel oil analysis results were not used. The No. 5 Power Boiler and the No. 7 Power Boiler are permitted to No. 6 fuel oil that contains on-spec used oil. Does the stated result include that from on-spec used oil?

Response: At the time that the original HBCA application was submitted, there was no site-specific fuel analysis data available for No. 6 fuel oil. Instead, general fuel oil information from Perry's Chemical Engineer's Handbook was used for the No. 6 fuel oil chlorine concentration. Because of the lack of data, No. 6 fuel oil samples were obtained and analyzed on January 3, 2007. A summary of the fuel analysis results are presented in Table A-3 in Attachment D. Actual lab results are included in Attachment E. Chlorine concentrations based on these results were updated in Table 3-1 and the facility was remodeled. The results of the revised modeling are presented in Table 3-3. Revised Tables 3-1, 3-3, and A-3 are included in Attachment D and should be inserted into the appropriate location in the original document. According to the results, chlorine impacts at SSCE do not exceed the hazard index at the property boundary.

The chlorine concentration in No. 6 fuel oil, as reported in the revised Table A-3, did not contain on-spec used oil. The chlorine concentration in on-spec used oil is expected to be low, since the Total Halogen requirement specified in the mill's Air Operating Permit (0890003-009-AV) is limited to no more than 1,000 parts per million (ppm).

Comment 11. It is stated in Table 3-1 that while burning bark in Power Boiler No. 5, 47% of the total chlorine is emitted as Cl_2 and that while burning coal in Power Boiler No. 7, 1% of the total chlorine is emitted as Cl_2 . Please explain how this information was used in the HBCA demonstration. Appendix A, 4(a)(1) states when conducting fuel analysis, any detected chlorine must be assumed to be emitted as Cl_2 .

Response: Although Appendix A states that any detected chlorine must be assumed to be emitted as chlorine gas, this does not realistically portray the emissions from Power Boiler Nos. 5 and 7. Typically, for a combustion source, the majority of chlorine in the fuel is emitted as hydrochloric acid (HCl). Therefore, SSCE conducted stack testing to obtain more accurate information. The total chlorine emissions are determined from the fuel analysis, while the percentage of chlorine emitted as chlorine gas is determined from the **stack tests**. As is demonstrated with coal, the amount of chlorine gas that exits the stack is approximately 1-percent of the total chlorine in the fuel. The requirement in Appendix A to assume that all chlorine is emitted as chlorine gas is a highly conservative estimate. By combining the fuel and stack test results, a more accurate chlorine and chlorine gas value is portrayed and reflected in the modeling.

Comment 12. Please note that Construction Permit No. AC45-194149 established the particulate matter emissions for the No. 5 Power Boiler to be 0.3 lb/MMBtu when firing carbonaceous fuel, 137.1 lb per hour and 598.9 TPY. The application page states the potential PM emissions as 0.3 lb/MMBtu, 171.9 lb/hr and 600.5 TPY. Please revise the application pages accordingly.

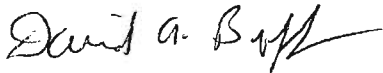
Response: The revised application pages are included in Attachment F and should be inserted into the appropriate location in the original application.

Signed responsible official (R.O.) and professional engineer (P.E.) certification statements are included with this RAI response.

Thank you for consideration of this information. If you have any questions, please do not hesitate to call me at (352)336-5600.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.
Principal Engineer



E. Claire Booth, E.I.
Staff Engineer

CB/DB/all

Enclosures

cc: Bill Crews, SSCE
Rachel Davis, SSCE

Y:\Projects\2006\0637612 SSCE HBCA\4.1\RAI 120806\Final\020107-612.doc

Professional Engineer Certification

1. Professional Engineer Name: David A. Buff Registration Number: 19011
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc.** Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653
3. Professional Engineer Telephone Numbers... Telephone: (352) 336-5600 ext. 545 Fax: (352) 336-6603
4. Professional Engineer Email Address: dbuff@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> <p>Signature: <u>David A. Buff</u> Date: <u>2/1/07</u></p> <p>(seal)</p>

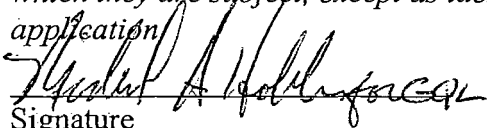
* Attach any exception to certification statement.

** Board of Professional Engineers Certificate of Authorization #00001670

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: George Q. Langstaff, Vice-President, Regional Mill Operations
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Smurfit-Stone Container Enterprises, Inc. Street Address: North 8th Street City: Fernandina Beach State: FL Zip Code: 32034
4. Application Responsible Official Telephone Numbers... Telephone: (904) 261-5551 ext. Fax: (904) 277-5888
5. Application Responsible Official Email Address: glangsta@smurfit.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature _____ Date <u>2-05-07</u>



ATTACHMENT A

RESPONSIBLE OFFICIAL CORRESPONDENCE



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 3955

J 7004 0750 0003 3874 3955

March 31, 2006

Mr. Christopher Kirts, PE
District Air Program Administrator
Florida Department of Environmental Protection
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7590

Re: Change in Responsible Official
Smurfit-Stone Container Enterprises, Inc.
Fernandina Beach Mill
Title V Permit No. 0890003-001-AV

Dear Mr. Kirts:

In accordance with the requirements of Rule 62-213.202 F.A.C. the enclosed Responsible Official Notification Form provides an update to the Primary Responsible Official and Additional Responsible Officials for the Fernandina Beach Mill.

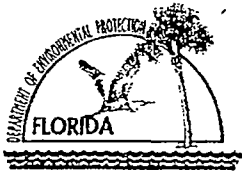
Please contact me at (904) 277-7746 or by Email at bcrews@smurfit.com if you need any additional information.

Sincerely,

A handwritten signature in cursive script that reads "William O. Crews".

William O. Crews
Environmental Manager

Enclosure



Department of Environmental Protection

Division of Air Resource Management RESPONSIBLE OFFICIAL NOTIFICATION FORM

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

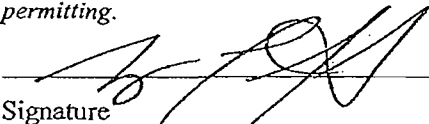
Identification of Facility

1. Facility Owner/Company Name: Smurfit-Stone Container Enterprises, Inc.	
2. Site Name: Fernandina Beach Mill	3. County: Nassau
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 0890003-001-AV	

Notification Type (Check one or more)

<input type="checkbox"/> INITIAL:	Notification of responsible officials for an initial Title V application.
<input checked="" type="checkbox"/> RENEWAL:	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/> CHANGE:	Notification of change in responsible official(s).
Effective date of change in responsible official(s) <u>4/1/06</u>	

Primary Responsible Official

1. Name and Position Title of Responsible Official: George Q. Langstaff, Vice-President, Regional Mill Operations
2. Responsible Official Mailing Address: Organization/Firm: Smurfit-Stone Container Enterprises, Inc. Street Address: North 8 th Street (PO Box 2000) City: Fernandina Beach State: FL Zip Code: 32034
3. Responsible Official Telephone Numbers: Telephone: (904) 261-5551 Fax: (904) 277-5888
4. Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
5. Responsible Official Statement: <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i>  Signature _____ Date <u>3/30/06</u>

Additional Responsible Official

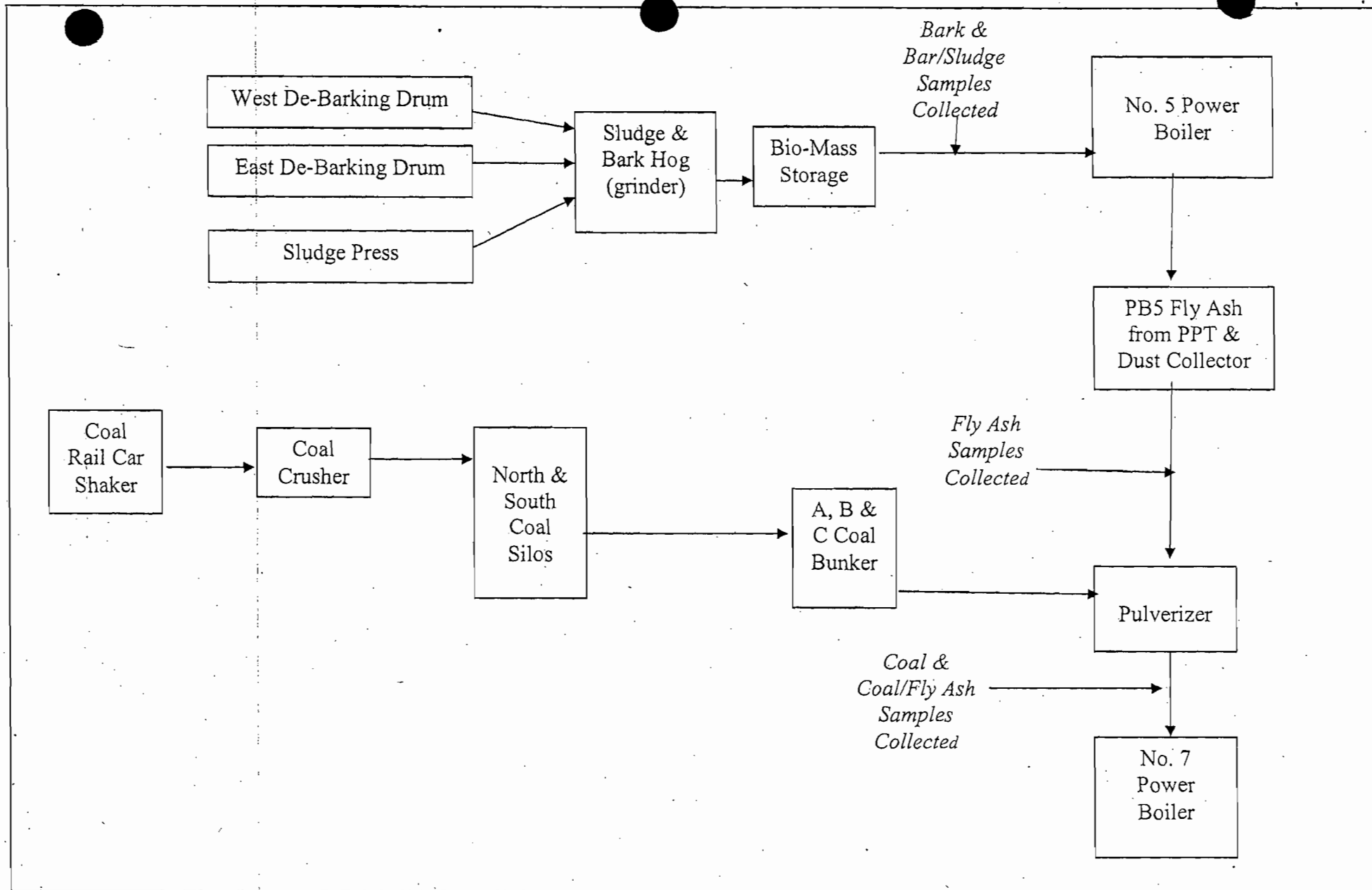
1. Name and Position Title of Responsible Official: Mike H. Holden, Production Manager
2. Responsible Official Mailing Address: Organization/Firm: Smurfit-Stone Container Enterprises, Inc. Street Address: North 8 th Street (PO Box 2000) City: Fernandina Beach State: FL Zip Code: 32034
3. Responsible Official Telephone Numbers: Telephone: (904) 261-5551 Fax: (904) 277-5888
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official: Stephen J. Devlin, Maintenance & Engineering Manager
2. Responsible Official Mailing Address: Organization/Firm: Smurfit-Stone Container Enterprises, Inc. Street Address: North 8 th Street (PO Box 2000) City: Fernandina Beach State: FL Zip Code: 32034
3. Responsible Official Telephone Numbers: Telephone: (904) 261-5551 Fax: (904) 277-5888
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

ATTACHMENT B

FUEL CONVEYOR SYSTEM FLOW DIAGRAM



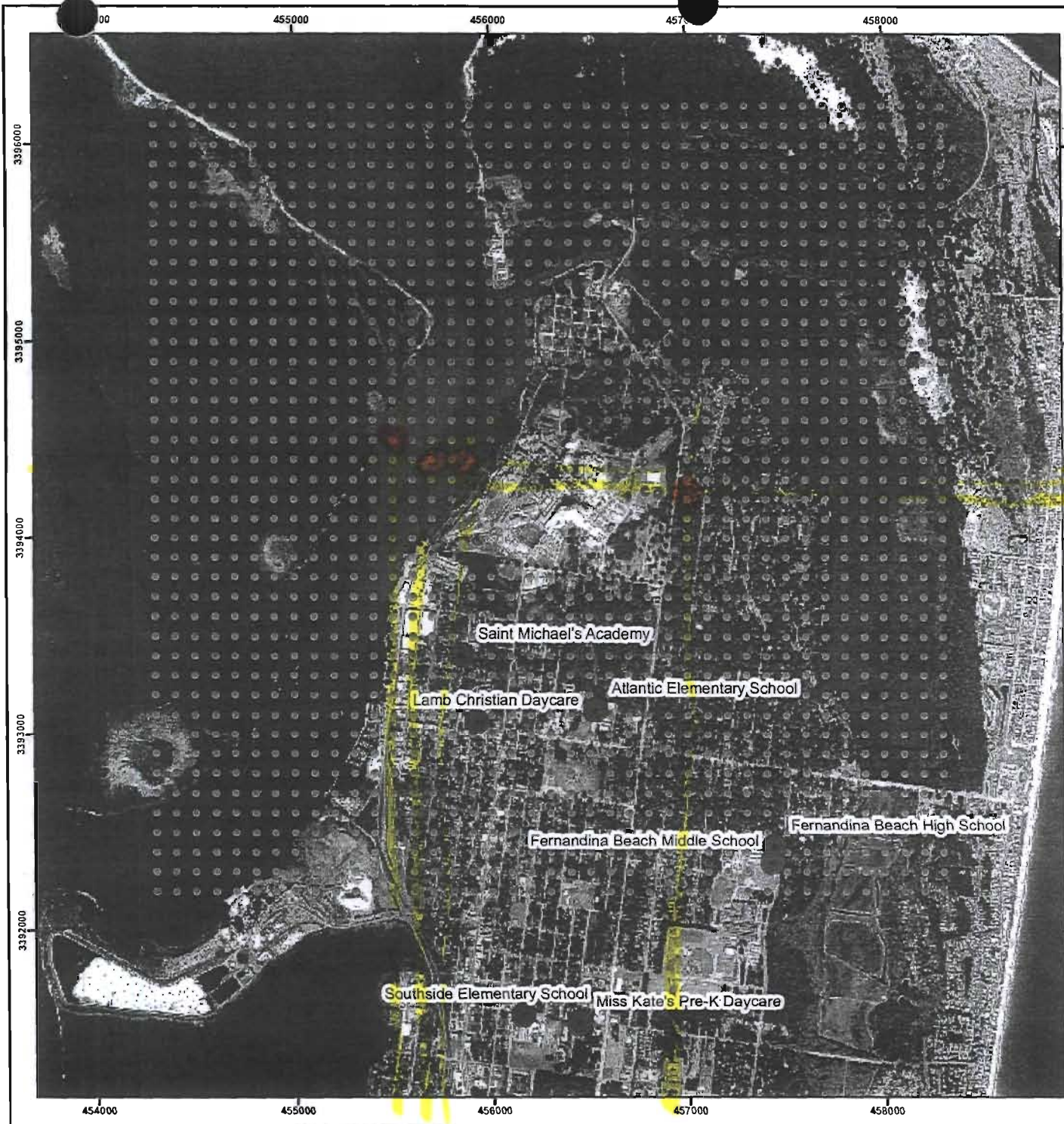
**Solid Fuel Conveyor System and Sample Locations
Smurfit-Stone Container Corporation Fernandina Beach Mill**

Source: Golder, 2006

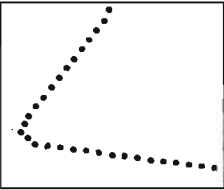
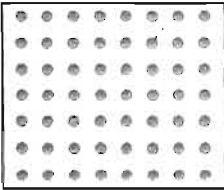

0637612/4/1/RAI010306/FuelConveyorFlowDiagram.doc

ATTACHMENT C

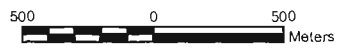
RECEPTOR GRID LOCATIONS AND SENSITIVE AREAS



LEGEND


-  Property Boundary - 50m Spacing
-  Receptor Grid: - 100m Spacing
-  Sensitive Area

REFERENCE
 Projection: Transverse Mercator Datum: NAD 27 Coordinate System: UTM Zone 17



PROJECT
 Health-based Compliance Alternative Demonstration for the Smurfit-Stone Container Enterprises, Fernandina Beach Mill

TITLE
**Receptor Grid Locations
 Overlaid on an Aerial Photograph**

	PROJECT No.		SCALE AS SHOWN	REV 0
	DESIGN	AB	01 Feb. 2007	FIGURE A
	GIS	AB	01 Feb. 2007	
	CHECK	CB	01 Feb. 2007	
	REVIEW	DB	01 Feb. 2007	

ATTACHMENT D

REVISED HBCA TABLES

**TABLE 2-2
STACK AND OPERATING PARAMETERS AND LOCATIONS USED IN THE HBCA MODELING ANALYSIS, SMURFIT-STONE CONTAINER ENTERPRISES, FERNANDINA BEACH MILL**

Emission Unit	Model ID	UTM Coordinates ^a		Stack Data ^b						Operating Data ^c					
		East (m)	North (m)	Height		Diameter		Area		Heat Input (MMBtu/hr)	Temperature		Gas Flow (acfm)	Velocity	
				ft	m	ft	m	ft ²	m ²		°F	°K		ft/s	m/s
Power Boiler No. 5	PB5	456,274.5	3,394,248.9	257	78.3	11.0	3.35	95.03	8.83	805	450	505	235,000	41.2	12.6
Power Boiler No. 7	PB7	456,255.9	3,394,207.8	340	103.6	14.8	4.51	172.03	15.98	1,021	410	483	360,000	34.9	10.6

^a Universal transverse mercator (UTM) coordinates, Zone 17, NAD 27.

^b Stack data based on Title V renewal application (December 2002).

^c Operating data based on November 2004 and January 2005 stack test data.

TABLE 3-1
 MAXIMUM ANNUAL HCl-EQUIVALENT EMISSIONS, SMURFIT-STONE CONTAINER ENTERPRISES, FERNANDINA BEACH MILL

Boiler ID	Model ID	Emission Estimation Method ^a	Heat Input (MMBtu/hr)	Hours of Operation (hr/yr)	Chlorine Emission Factor (lb/MMBtu) ^b	HCl Hourly Emission Rate (lb/hr) ^c	Cl ₂ Hourly Emission Rate (lb/hr) ^c	Toxicity-Weighted Emission Rate (HCl-Equivalents)		Maximum Annual Emissions (TPY)
								lb/hr ^d	g/s	
Power Boiler No. 5	PB5	Bark/Sludge Fuel Analysis	457	8,760	0.05	12.11	10.74	1,145.6	144.35	5,017.8
Power Boiler No. 5	PB5	No. 6 Fuel Oil Fuel Analysis	805	8,760	3.6E-03	0.66	0.59			
Power Boiler No. 7	PB7	Coal Fuel Analysis	1,021	8,760	0.144	145.55	1.47	292.6	36.86	1,281.5
							Total	1,438.18	181.21	6,299.2

^a Based on worst-case fuel. Worst-case fuel for Power Boiler No. 5 is maximum bark/sludge with the remainder No. 6 fuel oil (see Tables A-1 through A-3) and worst-case fuel for Power Boiler No. 7 is coal (see Table A-4).

^b Based on the 90th percentile of historical fuel analysis data with a safety factor of 2 (see Table A-2 and A-4). No. 6 fuel oil emission factor based on a single sample obtained for analysis on January 3, 2007 with no safety factor applied (see Table A-3).

^c Emissions for Power Boiler No. 5 are based on maximum bark/sludge burning and remainder due to No. 6 fuel oil. While burning bark in Power Boiler No. 5, 47% of the total chlorine is emitted as Cl₂ (see Table A-5). While burning coal in Power Boiler No. 7, 1% of the total chlorine is emitted as Cl₂ (see Table A-6).

^d Based on Equation 2 in Appendix A (Subpart DDDDD). RV_{HCl} is 0.02 mg/m³ and RV_{Cl_2} is 0.0002 mg/m³.

**TABLE 3-3
 MAXIMUM PREDICTED HCL-EQUIVALENT IMPACTS,
 SMURFIT-STONE CONTAINER ENTERPRISES, FERNANDINA BEACH MILL**

Averaging Period	Year	Maximum Predicted HCl- Equivalent Impacts ($\mu\text{g}/\text{m}^3$)	Receptor Location ^a		HCl Criteria ($\mu\text{g}/\text{m}^3$)	Hazard Index ^b
			East (m)	North (m)		
Annual	2001	18.3	455800	3394300	20	0.92
	2002	16.2	455800	3394300		0.81
	2003	14.1	455700	3394300		0.71
	2004	12.9	456924	3394208		0.65
	2005	15.0	455800	3394300		0.75

^a UTM coordinates in Zone 17.

^b The Hazard Index is determined by dividing the maximum predicted HCl-equivalent impacts by the HCl criteria ($20 \mu\text{g}/\text{m}^3$).

Note: Concentrations are highest predicted with AERMOD model and 5-years of meteorological data from Jacksonville, 2001 through 2005.

TABLE A-3
NO. 6 FUEL OIL ANALYSIS FOR POWER BOILER NO. 5,
SMURFIT-STONE CONTAINER ENTERPRISES,
FERNANDINA BEACH MILL

Parameter	No. 6 Fuel Oil
Dry Basis:	
Btu/lb	18,324
lb/gal	8.2
Btu/gal	150,257
Ultimate Analysis (Dry Basis %)	
Carbon	84.33
Hydrogen	12.07
Oxygen	1.12
Sulfur	2.28
Ash	0.12
Trace Element Concentrations	
Chloride, ppm	64
Chloride, lb/MMBtu	3.5E-03
Hydrogen Chloride, ppm	65.8
Hydrogen Chloride, lb/MMBtu	3.6E-03
Manganese, ppm	0.57
Manganese, lb/MMBtu	3.1E-05
Mercury, ppm	<0.02
Mercury, lb/MMBtu	<1.1E-06

Source: Columbia Analytical Services, Inc. results for a No. 6 fuel oil sample submitted by SSCE for analysis on January 3, 2007.

ATTACHMENT E

NO. 6 FUEL OIL ANALYSIS

COLUMBIA ANALYTICAL SERVICES, INC

Analytical Report

Client: Smurfit-Stone Container Enterprises, Inc.
Project Name: Used Oil & BOILER MACT
Project Number:
Matrix: OIL

Service Request: J0700035
Date Collected: 1/3/07
Date Received: 1/4/07

TOTAL METALS

Sample Name: No 6 Fuel Oil
Lab Code: J0700035-001
Test Notes:

Unit: mg/kg
Basis: AS RECEIVED

Analyte	Prep Method	Analysis Method	MRL	Dilution Factor	Date Extracted	Date Analyzed	Results	Result Notes
Manganese	EPA 3050B	6020	0.47	1.0	1/5/07	1/17/2007	0.57	
Mercury	METHOD	7471	0.021	1.0	1/16/07	1/16/2007	U	

COLUMBIA ANALYTICAL SERVICES, INC

Analytical Report

Client: Smurfit-Stone Container Enterprises, Inc.
Project Name: Used Oil & BOILER MACT
Project Number:
Matrix: OIL

Service Request: J0700035
Date Collected: NA
Date Received: NA

TOTAL METALS

Sample Name: Method Blank
Lab Code: J0700035-MBS
Test Notes:

Unit: mg/kg
Basis: NA

Analyte	Prep Method	Analysis Method	MRL	Dilution Factor	Date Extracted	Date Analyzed	Results	Result Notes
Manganese	EPA 3050B	6020	0.50	1.0	1/5/07	1/17/2007	U	
Mercury	METHOD	7471	0.025	1.0	1/16/07	1/16/2007	U	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Smurfit-Stone Container Enterprises, Inc.
Project Name: Used Oil & BOILER MACT
Project Number: NA
Sample Matrix: OIL

Service Request: J0700035
Date Collected: 01/03/07
Date Received: 01/04/07

Chloride

Prep Method: 5050
Analysis Method: 9056
Test Notes:

Units: mg/Kg (ppm)
Basis: Dry

Sample Name	Lab Code	MRL	Dilution Factor	Date/Time Analyzed	Result	Result Notes
No 6 Fuel Oil	J0700035-001	21	1	01/12/07 02:23	64	
Method Blank	J0700035-MB	20	1	01/12/07 02:23	U	

COLUMBIA ANALYTICAL SERVICES, INC

QA/QC Report

Client: Smurfit-Stone Container Enterprises, Inc.
Project Name: Used Oil & BOILER MACT
Project Number:
Matrix: OIL

Service Request: J0700035
Date Collected: NA
Date Received: NA
Date Extracted: 1/5/07
Date Analyzed: 1/17/2007

Laboratory Control Sample Summary
TOTAL METALS

Sample Name: Laboratory Control Sample
Lab Code: J0700035-LCSS
Test Notes:

Unit: mg/kg
Basis: NA

Analyte	Prep Method	Analysis Method	MRL	True Value	Results	Percent Recovery	CAS Percent Recovery Acceptance Limits	Result Notes
Manganese	EPA 3050B	6020	0.50	100	98.6	99	80-120	
Mercury	METHOD	7471	0.025	0.250	0.274	110	80-120	

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client : Smurfit-Stone Container Enterprises, Inc.
Project Name : Used Oil & BOILER MACT
Project Number : NA
Sample Matrix : OIL

Service Request : J0700035
Date Collected : NA
Date Received : NA
Date Extracted : NA
Date Analyzed : 01/12/07

Laboratory Control Sample Summary
 Inorganic Parameters

Sample Name : Laboratory Control Sample
Lab Code : J0700035-LCS
Test Notes :

Units : mg/Kg (ppm)
Basis : Dry

Analyte	Prep Method	Analysis Method	True Value	Result	Percent Recovery	CAS	Result Notes
						Percent Recovery Acceptance Limits	
Chloride	5050	9056	1593	1540	97	85-115	



Diversified Environmental Laboratories, Inc.

3653 Regent Blvd., Suite 509
 Jacksonville, Florida 32224
 Telephone (904) 807-9625 • Fax (904) 807-9627
 www.diversifiedenvlabs.com

January 17, 2007

Tom Kissinger
 Columbia Analytical Services, Inc.
 8540 Baycenter Road
 Jacksonville, FL 32258

Re: DEL, Inc. Project Number: 070105.02
 Client Project Description: CAS Project #J0700035
 Client PO Number: J0700035

Dear Mr. Kissinger:

Enclosed is the report of laboratory analysis for the following samples:

Sample Number	Sample Description	Date Received	Date/Time Collected
6540	J0700035-001	01/05/07	01/03/07 09:47

If you have any questions or comments concerning this report, please do not hesitate to contact us.

Sincerely,

Franklin A. Risk, Jr.
 Laboratory Director

Enclosures

Results

DEL, Inc. Project Number
070105.02

Columbia Analytical Services, Inc.

Project Description

CAS Project #J0700035

Report Date: January 17, 2007

Sample Number: 6540
 Sample Designation: J0700035-001

Matrix: Oil
 Date/Time Collected: 01/03/07 09:47

Parameters	Method	Results	Units	DF	MDL	Prep Date/Time	Analyst	Analysis Date/Time
BTU/Lb (As Received)	ASTM D240	18324	BTU/lb	1	1		FAR	01/17/07

**DESERT ANALYTICS**

ANALYSIS FOR THE CHEMICAL ELEMENTS

P.O. Box 41838

Tucson, Arizona 85717

Phone (520) 623-3381

Fax (520) 623-9218

Certificate of Analysis

Tom Kissinger
COLUMBIA ANALYTICAL SERVICES, INC.
8540 Baycenter Road
Jacksonville, FL 32256

Sample ID	%C	%H	%Cl	%S	%Ash	%O
<hr/> Project: J0700035						
J0700035-01 No 6 Fuel Oil	84.33	12.07	0.08	2.28	0.12	1.12

Reported oxygen done by calculation.

Richard C. Johnson, Ph.D

January 22, 2007

ATTACHMENT F

REVISED PM APPLICATION PAGES

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

Section [1]
No. 5 Power Boiler

Page [1] of [3]
Particulate Matter - PM

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 137.1 lb/hour 598.9 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.3 lb/MMBtu Reference: Permit Limit		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Carbonaceous Fuel: 0.3 lb/MMBtu x 457 MMBtu/hr = 137.1 lb/hr Annual emissions based on permit limit.			
11. Potential Fugitive and Actual Emissions Comment: Potential emissions based on firing carbonaceous fuel.			

EMISSIONS UNIT INFORMATION

Section [1]
No. 5 Power Boiler

POLLUTANT DETAIL INFORMATION

Page [1] of [3]
Particulate Matter - PM

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **1** of **3**

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.3 lb/MMBtu	4. Equivalent Allowable Emissions: 137.1 lb/hour 598.9 tons/year
5. Method of Compliance: Annual stack test using EPA Method 5.	
6. Allowable Emissions Comment (Description of Operating Method): Permit Limit (Permit No. 0890003-001-AV). Applies to carbonaceous fuel firing only.	

Allowable Emissions Allowable Emissions **2** of **3**

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.1 lb/MMBtu	4. Equivalent Allowable Emissions: 65.78 lb/hour 251.15 tons/year
5. Method of Compliance: Annual stack test using EPA Method 5.	
6. Allowable Emissions Comment (Description of Operating Method): Permit Limit (Permit No. 0890003-001-AV). Applies to fuel oil firing. Maximum annual based on 24-hour limitation of 573.4 MMBtu/hr (3,850 gal/hr).	

Allowable Emissions Allowable Emissions **3** of **3**

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: 09/13/07
3. Allowable Emissions and Units: 0.07 lb/MMBtu	4. Equivalent Allowable Emissions: 56.35 lb/hour 246.8 tons/year
5. Method of Compliance: Annual stack test using EPA Method 5.	
6. Allowable Emissions Comment (Description of Operating Method): 40 CFR 63 Subpart DDDDD	



Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Colleen Castille
Secretary

November 13, 2006

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

Nassau County –Air Permitting
Smurfit-Stone Container Enterprises, Inc.
Fernandina Beach Mill
Request for Additional Information Regarding HBCA Title V Permit Revision Application

Dear Mr. Langstaff:

On September 14, 2006, the Department received your application for a Title V Permit Revision.

However, in order to continue processing your application, the Department will need the below additional information pursuant to Rule 62-213.420(1)(b)4., F.A.C., and Rule 62-4.070(1), F.A.C. Should your response to any of the following items require new calculations please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please state who signed Compliance Report and Plan/Compliance Certification for Mr. George Q. Langstaff. Has this individual been designated as a Responsible Official pursuant to the requirements of Rule 62-213.202, F.A.C.?
2. Please describe the location where the samples of the solid fuel were collected for the fuel analysis and describe the fuel conveyor system. Please also provide a flow diagram of the fuel conveyor system.
3. In Figure 3-2 Receptor Grid Locations, please indicate what are the sensitive receptors (for example, school, daycare, senior community, hospital).
4. The mill has proposed a chlorine emissions limit of 0.05 lb/MMBtu with a fuel type of 100% carbonaceous fuel and 0.144 lb/MMBtu as federally enforceable conditions in the Title V permit for the No. 5 Power Boiler and the No. 7 Power Boiler, respectively. Please realize that such permit conditions and limitations will more than likely require compliance demonstrations. Please state how the mill intends to demonstrate compliance with the proposed chlorine emission limits. Furthermore, the mill has indicated that the worse-case fuel for HCl emissions from the No. 5 Power Boiler is the combination of bark/sludge with No. 6 fuel oil. However, such a fuel mix is not proposed as a federally enforceable condition. Please explain. What quantity of bark/sludge and No. 6 fuel oil is fired in the boiler to obtain the worse case fuel as stated in Table 3-1 of the application? What do "maximum" of bark/sludge and "remainder" of No.6 fuel oil mean?

5. The stack information presented in Table 2-2 reflects a heat input rate of 802 MMBtu/hr for the No. 5 Power Boiler. The maximum heat input rate for this boiler for any combination of No. 6 fuel oil and carbonaceous fuel is 805 MMBtu/hr. Please explain why 802 MMBtu/hr was used for the model input. Please explain and provide justification why the operating data presented in this table is different from the information presented in the Title V Renewal application, namely the gas flow rate, velocity, and temperature.
6. The operating data presented in Table 2-2 for the No. 7 Power Boiler is different from the information presented in the Title V Renewal application and the Department's historical data for this emissions unit. Please explain and provide justification for the information that was used in the modeling analysis.
7. Please explain why a safety factor of 2 was applied to the fuel analysis results of the No.5 Power Boiler bark/sludge and the No. 7 Power Boiler coal? Please explain why a safety factor was not added to the No. 6 fuel oil fuel analysis results.
8. 40 CFR 63.7521(b) requires a facility to develop and submit a site-specific fuel analysis plan for review and approval no later than 60 days before the date that the compliance demonstration is intended. The Department is not in receipt of such a plan for this mill. Will the mill be submitting the site-specific fuel analysis plan at a later date?
9. 40 CFR 63.7521(c) requires that at a minimum, three composite fuel samples for each type of fuel be obtained according to the procedures in 40 CFR 63.7521(c)(1) or (2). It appears from Table A-1, that only 2 samples were analyzed of the bark. Please explain.
10. It appears from Table A-3 that the No. 6 Fuel oil information is from Perry's Chemical Engineer's Handbook as opposed to being actual fuel oil analysis results. Is this correct? Please explain why site-specific fuel oil analysis results were not used. The No. 5 Power Boiler and the No. 7 Power Boiler are permitted to No. 6 fuel oil that contains on-spec used oil. Does the stated results include that from on-spec used oil?
11. It is stated in Table 3-1 that while burning bark in Power Boiler NO. 5, 47% of the total chlorine is emitted as CL2 and that while burning coal in Power Boiler No. 7, 1% of the total chlorine is emitted as Cl2. Please explain how this information was used in the HBCA demonstration. Appendix A, 4(a)(1) states when conducting fuel analysis, any detected chlorine must be assumed to be emitted as Cl2.
12. Please note that Construction Permit No. AC45-194149 established the particulate matter emissions for the No. 5 Power Boiler to be 0.3 lb/MMBtu when firing carbonaceous fuel, 137.1 lb per hour and 598.9 TPY. The application page states the potential PM emissions as 0.3 lb/MMBtu, 171.9 lb/hr and 600.5 TPY. Please revise the application pages accordingly.

Mr. George Q. Langstaff, V.P. Regional Mill Operations
Smurfit-Stone Container Enterprises, Inc.
Request For Additional Information
Page Three

Responsible Official (R.O.) Certification Statement:

Rule 62-213.420, F.A.C. requires that a responsible official must certify all Title V permit applications. Due to the nature of the information requested above, the responsible official should certify your response. Please complete and submit a new R.O. certification statement page from the Application for Air Permit – Title V Source, DEP Form No. 62-210.900(1), effective February 2, 2006.

Professional Engineer (P.E.) Certification Statement:

Rule 62-4.050(3), F.A.C. requires that a professional engineer registered in the State of Florida certify all applications for a Department permit. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, a professional engineer registered in the State of Florida should certify your response. Please complete and submit a new P.E. certification statement page from the Application for Air Permit – Title V Source, DEP Form No. 62-210.900(1), effective February 2, 2006.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C.

If you should have any questions, please call Khalid Al-Nahdy at (904) 807-3243.

Sincerely,

Christopher L. Kirts, P.E.
District Air Program Administrator

CLK:KAA:rfb

Cc:

David A. Buff, P.E., Golder Associates, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RESEARCH TRIANGLE PARK, NC 27711

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION

2006 SEP 14 P. 1:36

SEP -7 2006

NORTHEAST DISTRICT
JACKSONVILLE, FL

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Nina E. Butler
VP & Sr. Environmental Counsel
Smurfit-Stone Container Enterprises, Inc.
Environmental Affairs Department
1979 Lakeside Parkway, Suite 300
Tucker, Georgia 30084

Dear Ms. Butler:

I am writing in response to your letter dated September 1, 2006, which included several alternative method requests. You are requesting the alternative methods on behalf of the Smurfit-Stone Container Enterprises facilities in the following locations: Brewton, Alabama; Stevenson, Alabama; Fernandina Beach, Florida; Panama City, Florida; Hodge, Louisiana; Ontonagon, Michigan; Missoula, Montana; Coschocton, Ohio; Florence, South Carolina; Hopewell, Virginia; and West Point, Virginia. These facilities must comply with the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD). The boilers must meet the standards in Subpart DDDDD for Particulate Matter (PM) or Total Select Metals (TSM), Mercury (Hg), and total chlorine emissions. These facilities have chosen to comply with Subpart DDDDD by conducting a fuel analysis and comparing the results to the TSM, Hg and chlorine standards. Table 6 of Subpart DDDDD lists the various methods allowed for fuel analysis, but you have requested methods not listed in Table 6 for your fuel analysis plans. You have requested approval to use test methods with better applicability, sensitivity and selectivity than those specified in Subpart DDDDD, Table 6.

Pursuant to 40 CFR Part 63, Section 63.7, the U.S. Environmental Protection Agency hereby approves your request to use the following methods at the facilities listed above:

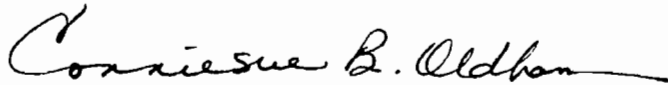
ASTM E829-94 (sample preparation for solids)
SW-846-5050 or ASTM D4208-02 (sample preparation for chlorine)
SW-846-9056 (total chlorine measurement)
EPA 821-R-01-013 and EPA 1631E (mercury digestion and analysis)
TAPPI T266 (sample preparation, digestion, TSM)
SW-846-3050 (sample digestion, TSM)
SW-846-6010 (TSM analysis)
SW-846-7060 (arsenic measurement)
SW-846-7740 (selenium measurement)
SW-846-6020 (TSM measurement)
SW-846-3051M (TSM sample digestion)

Since individual laboratories following the same method will have different detection capabilities, the facilities should review the specific candidate laboratory's demonstrated detection limits to ensure that they are sufficient to conclusively determine that the boilers comply with the Subpart DDDDD emission limits.

You have also requested approval to use Method 26A and Method 5B (both of 40 CFR Part 60, Appendix A) as alternatives to the performance testing requirements in Subpart DDDDD. Method 26A, along with Method 26, are allowed test methods for hydrogen chloride in Subpart DDDDD and would therefore not need alternative method approval from us. However, Method 5B is not allowed as an alternative to Method 5 or 17 (both allowed in Subpart DDDDD), since the use of Method 5B would result in a low bias in the particulate matter measured. Therefore, we are disapproving the use of Method 5B for particulate measurement at the facilities listed above.

If you have further questions on this matter, please contact Rima Howell at (919) 541-0443.

Sincerely,



Conniesue B. Oldham, Ph.D., Group Leader
Measurement Technology Group

cc: John Pinkerton, NCASI



Environmental Affairs Department
1979 Lakeside Parkway, Suite 300
Tucker, Georgia 30084

770-621-6741
770-621-6733 fax
nbutler@smurfit.com

September 1, 2006

VIA OVERNIGHT MAIL

Dr. Conniesue B. Oldham, Group Leader
United States Environmental Protection Agency
Office of Air Quality Planning and Standards
Emission Measurement Center (Mail Code E143-02)
Research Triangle Park, North Carolina 27711

Re: Request for Approval of Alternative Fuel Analytical and Performance Testing Methods
For Compliance with 40 C.F.R. Part 63, Subpart DDDDD

Dear Dr. Oldham:

Smurfit-Stone Container Enterprises, Inc. ("Smurfit-Stone") operates certain existing, solid fuel boilers that are subject to the National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 C.F.R. Part 63, Subpart DDDDD) ("Boiler MACT"). In accordance with 40 C.F.R. § 63.7, Smurfit-Stone is requesting U.S. EPA's approval of the alternative analytical and emissions testing procedures described below to demonstrate compliance with the requirements of Boiler MACT. Smurfit-Stone is requesting approval of these alternative methods and procedures on behalf of its pulp and paperboard mills identified in Attachment 1.

Alternative Fuel Analysis Methods

The Boiler MACT regulations contain emissions limits for hydrogen chloride (HCl), mercury and particulate matter ("PM") (or total select metals ("TSM")) for solid fuel boilers. Owners and operators of solid fuel boilers subject to Boiler MACT may demonstrate compliance with the emissions limits for HCl, mercury and PM/TSM by performing fuel sampling and analysis. Smurfit-Stone requests EPA's approval of the following changes to the specific, solid fuel analysis procedures and requirements set forth in 40 C.F.R. § 63.7521 and Table 6 to Subpart DDDDD.

(i) Sample Processing for WWTP Residuals and OCC Rejects

To comply with the Boiler MACT requirements for fuel analysis testing, samples of solid fuels must be processed in accordance with Table 6, which allows for use of the procedures at 40 C.F.R. § 63.7521(d) or equivalent methods. The National Council for Air and Stream Improvement ("NCASI") has determined that ASTM E829-94 (for refuse-derived fuel) is equivalent to those procedures set forth at 40 C.F.R. § 63.7521(d) (see "*Solid Fuel Sampling Procedure Guidance*," NCASI, June 21, 2004).

Many of the Smurfit-Stone mills identified in Attachment 1 burn wastewater treatment plant residuals (“WWTP residuals”) and old corrugated container (“OCC”) rejects in their solid fuel boilers. Unlike most other types of solid fuels, WWTP residuals and OCC rejects contain a substantial amount of water. Smurfit-Stone does not believe that the sample processing methods in Table 6 are appropriate for use with WWPT residuals or OCC rejects because of their wet nature. Specifically, grinding wet samples of these materials will yield a mush, not the random mixture of small particles that was intended by the requirement to grind fuel samples.

Smurfit-Stone is proposing to collect samples of WWPT Residuals and OCC rejects for analysis in accordance with the procedures set forth at 40 C.F.R. § 63.7521(c) and composite them using the procedures outlined at 40 C.F.R. § 63.7521(d) modified to include an initial drying step to facilitate grinding. Sample drying prior to grinding is consistent with ASTM E829-94 (for refuse-derived fuels). However, Smurfit-Stone requests EPA’s approval to modify the (ASTM) prescribed sample drying method. Specifically, as recommended by NCASI, Smurfit-Stone proposes to dry WWTP residual and OCC reject samples at a maximum temperature of 60° C instead of drying the samples at 40° C and then at 107° C. We believe that by drying these fuel samples as proposed to achieve a constant weight for these materials, our mills will be able to avoid problems with grinding while also preventing volatilization of mercury during sample processing

(ii) Hydrogen Chloride Analysis

Table 6 to Subpart DDDDD specifies the following two methods for analyzing fuels for hydrogen chloride (measuring total chlorine as chloride): SW-846-9250 for aqueous samples or ASTM E776-87 for biomass. Both of these methods have certain limitations. Specifically, SW-846-9250 is not applicable to solid matrices without an additional sample preparation step, and its use of colorimetric endpoints is subject to bias in the presence of other halides. ASTM E776-87 also involves the use of titrimetric endpoints that can result in bias in the presence of halides and multiple other compounds.

Based on recommendations made by NCASI, Smurfit-Stone is requesting EPA approval to use SW-846-5050 with the ion chromatography option (SW-846-9056) for chloride measurement of all fuel samples (solid, biomass (including WWPT residuals and OCC rejects), and liquid). This approach is less susceptible to bias than the methods listed in Table 6 and provides better sensitivity than the Table 6 methods.

Table 6 does not list an appropriate analytical method for measuring the chlorine concentration in coal. For this reason, Smurfit-Stone also requests approval to use the bomb digestion from ASTM D4208-02 in combination with SW-846-9056 for determining total chlorine in coal. This approach is consistent with the approach proposed by NCASI for analyzing biomass.

(iii) Mercury Analysis

Table 6 specifies use of Method SW-846-7471A for mercury analysis of solid samples (other than coal for which ASTM D3684-01 is specified). For both liquid and solid samples (including

coal), Smurfit-Stone requests approval to use EPA Method 1631E with the biomass/organic digestions given in EPA-821-R-013 (for organic and inorganic solids). NCASI has indicated that this method will give the lowest reporting levels for mercury (see *NCASI Solid Fuel Sampling Procedure Guidance*, June 21, 2004), and NCASI used this analytical method extensively in its own studies of mercury in bark and wood.

(iv) Total Select Metals Analysis

NCASI has recommended that that pulp and paperboard mills analyze arsenic and selenium in solid fuels separately from the other eight Total Select Metals (“TSM”) to provide the lowest reporting levels while avoiding the potential for high bias in arsenic and selenium results due to ICP/MS analyses (see *NCASI Solid Fuel Sampling Procedure Guidance*, June 21, 2004).

- For arsenic, NCASI recommends the use of SW-846-7060 coupled with the digestion given in SW-846-3050. NCASI also suggests that 1 gram samples be ground to 1mm or less to help mitigate sample heterogeneity and facilitate full dissolution.
- For selenium, NCASI recommends the use of SW-846-7740 coupled with the digestion given in SW-846-3050. NCASI also suggests that 1 gram samples be ground to 1mm or less to help mitigate sample heterogeneity and facilitate full dissolution.
- For the remaining TSM metals, NCASI has cautioned against grinding biomass samples to < 5mm in order to avoid contaminating processed samples with metals from the grinding equipment (e.g., Cr), and recommends the use of dry ashing to prepare biomass samples for analysis. Thus, after drying (above), biomass samples will be ground to no less than 5 mm and 10 g portions dry ashed using conditions specified by ASTM D1102, ASTM E830, TAPPI T-241 or TAPPI T-266 (all of which specify ashing of wood for the determination of metals at no greater than 575°C). Subsequent to the ashing step, the resulting ash will be acid digested per SW-846-3050 and the final acid digestate analyzed by SW-846-6010. Dry ashing 10 g samples mitigates issues associated with sample heterogeneity resulting from not grinding samples to smaller particle sizes and provides for lower reporting levels from the ICP/OES analysis than would be obtained from analysis of 1 g samples.

Smurfit-Stone requests approval to analyze biomass solid fuel samples (e.g., WWPT residuals and OCC rejects) in accordance with the NCASI recommendations set forth above.

To allow increased flexibility, Smurfit-Stone also requests approval to analyze final digestates from liquid or solid samples by ICP/MS using Method SW-846-6020.

Alternative Performance Testing Methods

The Boiler MACT regulations list specific methods to be used in performing emissions tests that will be used to demonstrate compliance with applicable emissions limits. For the reasons set forth below, Smurfit-Stone requests EPA's approval of the proposed alternatives to the test methods set forth at 40 C.F.R. § 63.7520 and Table 5 to Subpart DDDDD.

(i) Hydrogen Chloride Testing

Table 5 to Subpart DDDDD indicates that Method 26 or 26A in Appendix A of 40 C.F.R. Part 60 must be used to measure HCl emissions (and Cl₂ emissions as needed for the Health-Based Compliance Alternative ("HBCA") for HCl). Table 5 appears to give facilities the option of using Method 26 or Method 26A without regard to whether a boiler has a wet scrubber. However, there is some language in the preamble to the Boiler MACT regulations which suggests that Method 26 should be used in measuring HCl and Cl₂ emissions from boilers that do not have scrubbers. Smurfit-Stone requests that EPA clarify (and if necessary approve) use of Method 26A for measuring HCl and Cl₂ emissions from solid fuel boilers that do not have wet scrubbers (e.g., solid fuel boilers with wet and dry electrostatic precipitators). It is our understanding that use of Method 26A is likely to result in more accurate chlorine/chloride differentiation.

(ii) Particulate Matter Testing

According to Table 5, Method 5 or Method 17 in Appendix A to 40 C.F.R. Part 60 must be used to measure PM concentrations (positive pressure fabric filters are required to use Method 5D). Appendix A to 40 C.F.R. Part 60 includes an alternative method for determining particulate matter from stationary sources – Method 5B (PM non-sulfuric acid)). Several of the mills listed in Attachment 1 to this letter burn residual oil with biomass or coal; thus, it is possible that sulfuric acid contamination of particulate matter samples would not be detected using Method 5 or Method 17. Smurfit-Stone requests EPA approval to use Method 5B in conducting performance testing for PM to eliminate the potential bias associated with Methods 5 and 17.

Summary

The following table summarizes the alternative *analytical methods* for which Smurfit-Stone is seeking EPA approval.

Required Analysis	Matrix	Alternative Method(s) Requested for Approval
Sample Processing		
	Solid (WWPT Residuals OCC Rejects)	ASTM E829-94 with drying at 60° C maximum
Chloride (HCl)		
	Solid and Liquid (Fuel Oil)	SW-846-5050 w/ion chromatography option (SW-846-9056)
	Coal	SW-846-5050 w/ion chromatography option (SW-846-9056) Or ASTM D4208-02 with ion chromatography (SW-846-9056)
Mercury		
	Solid and Liquid (Fuel Oil)	EPA 1631E with digestion given in EPA/821-R-01-013
Total Select Metals		
Be, Cd, Cr, Pb, Mn, Ni	Solid	Grind samples to no less than 5 mm, dry ash 10 g ground sample (per ASTM D1102, ASTN E830, TAPPI T-211, TAPPI T-241, or TAPPI T-266), acid digest ash using SW-846-3050, and analyze final digestate using SW-846-6010
As	Solid	SW-846-7060 with digestion given in SW-846-3050 (1 gram sample ground to 1 mm or less)
Se	Solid	SW-846-7740 with digestion given in SW-846-3050 (1 gram sample ground to 1 mm or less)
All TSM	Liquid (Fuel Oil)	SW-846-6020 with digestion given in SW-846-3051M
	Solid Fuel (Biomass, including bark and WWPT residuals)	SW-846-6020

The following table summarizes the alternative *performance testing* methods for which Smurfit-Stone is seeking EPA approval.

Required Analysis	Alternative Test Method(s) Requested
Hydrogen Chloride	Method 26A, Appendix A, 40 C.F.R. Part 60 for boilers without wet scrubbers (i.e., approval to use 26A for solid fuel boilers with dry or wet ESPs)
Particulate Matter	Method 5B, Appendix A, 40 C.F.R. Part 60

Dr. Conniesue B. Oldham
September 1, 2006
Page 6

If you have any questions about this letter, please contact Charlie Ackel, Smurfit-Stone's Mill Division Environmental Engineering Manager, at (904) 714-7120 or me.

Thank you for your consideration of our request.

Sincerely,

Nina E. Butler
VP & Sr. Environmental Counsel

Cc: Robin Segall/EPA
Charlie Ackel/SSCC

Attachment 1

**Smurfit-Stone Container Enterprises, Inc.
Facilities List**

Alabama

322224 Highway 31, Brewton, Alabama 36426
1611 County Road 85, Stevenson, Alabama 35772

Florida

P.O. Box 2000, Fernandina Beach, Florida 32035-2000
One Everitt Avenue, Panama City, Florida 32401

Louisiana

100 Mill Street, Hodge, Louisiana 71247

Michigan

One Superior Way, Ontonagon, Michigan 49953

Montana

14377 Pulp Mill Road, Missoula, Montana 59806

Ohio

500 N. 4th Street, Coschocton, Ohio 43812

South Carolina

P.O. Box 100544, Florence, South Carolina 29501-0544

Virginia

910 Industrial Street, Hopewell, Virginia 23860
19th & Main Streets, West Point, Virginia 23181

ARMINV50

POINT	AIRS ID	0890003	STATUS	A	OFFICE	NED	NE: JACKSONVILLE
SITE NAME	SMURFIT-STONE CONTAINER ENTERPRISES, INC			COUNTY	NASSAU		
OWNER/COMP	SMURFIT-STONE CONTAINER ENTERPRISES, INC						

EU ID *	Stat	Description
006	A	#5 PWR BLR (BARK/2.5%S FO) 467/348 MMBTU/H; ESP A
007	A	#4 RECY BLR W/ESP & B-W LOW ODOR DESIGN A
011	A	#6 RB-S OR C REC/BOILER-STRAIGHT(S)KRAFT OR CROSS(C)W/ESP P
013	A	#4 SMELT DISSOLVING TANK W/VENTURI SCRUBBER
014	A	#5 SDT SMELT DISSOLVING TANK W/ WET SCRUBBER P
015	A	#7 PWR BLR 1021MMBTU COAL FIRED W/ESP FOR PM CONTROL AIA P
020	A	TALL OIL PLANT W/ PACKED TOWER TYPE WET SCRUBBER
021	A	#4 LIME KILN W/ ESP. ALSO BURNS NCG(TRS) GASES.
024	A	BROWN STOCK WASHER SYSTEM C LINE
025	A	UNREGULATED EU - WOOD YARD.
026	A	BROWNSTOCK WASHING

ARMINV50

POINT AIRS ID 0890003 STATUS A OFFICE NED NE: JACKSONVILLE

SITE NAME SMURFIT-STONE CONTAINER ENTERPRISES, INC COUNTY NASSAU

OWNER/COMP SMURFIT-STONE CONTAINER ENTERPRISES, INC

EU ID	Stat	Description
026	A	BROWNSTOCK WASHING
028	A	CHEMICAL RECOVERY AREA
029	A	CONVERTING/WAREHOUSE
030	A	FACILITY-WIDE MISC.
031	A	secondary fiber pulping
032	A	PAPERMAKING
033	A	PULPING SYSTEM (MACT I)
034	A	MILL PACKAGE BOILER
002	I	DISMANTLED #2 LIME KILN W/VENTURI SCRUBBER;#6 MEE BACK-UP CO
003	I	DISMANTLED #3 LIME KILN W/VENTURI SCRUBBER;#6 MEE PRIMARY CO
004	I	INACTIVE #3 PWR BLR #6 FO LOAD 352000LBS/D VARY (80-110%)

EU ID	006	#5 PWR BLR (BARK/2.5%S FO) 467/348 MMBTU/H; ESP			A	BT	A		
Type	<input checked="" type="checkbox"/>	SINGLE POINT SERVING A SINGLE EMISSIONS UNIT			Stack No	006			
Identification	EU13								
Discharge Type	<input checked="" type="checkbox"/>	A STACK WITH AN UNOBSTRUCTED OPENING DISCHARGING IN A VERTICAL/NEARLY VER							
Water Vapor %		GEP Height		Ft	Exit Temperature	415 F			
Flow Rate	376000	acfm	Stack Height	257	Ft	Exit Diameter	11.00 Ft		
Dry Std Flow		dscfm	Non Stack Ht		Ft	Exit Velocity	65.9 Ft/Sec		
UTM Zone	17	East	456.02	North	3394.01	Latitude	30 40 47.0000	Longitude	81 27 50.0000
DEP Comment									

EU ID	015	#7 PWR BLR 1021MMBTU COAL FIRED WESP FOR PM CONTROL AIA P	BT	A								
Type	<input checked="" type="checkbox"/>	MULTIPLE EMISSION POINTS SERVING 1 EMISSIONS UNI	Stack No.	015								
Identification												
Discharge Type	<input checked="" type="checkbox"/>	A STACK WITH AN UNOBSTRUCTED OPENING DISCHARGING IN A VERTICAL NEARLY VER										
Water Vapor %		GEP Height		Ft	Exit Temperature	335	F					
Flow Rate	436400	acfm	Stack Height	340	Ft	Exit Diameter	14.80	Ft				
Dry Std Flow		dscfm	Non Stack Ht.		Ft	Exit Velocity	42.0	Ft/Sec				
UTM Zone	<input type="checkbox"/>	East	<input type="checkbox"/>	North	<input type="checkbox"/>	Latitude	<input type="checkbox"/>	<input type="checkbox"/>	Longitude	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DEP Comment												