



United States Department of the Interior
FISH AND WILDLIFE SERVICE



IN REPLY REFER TO:

RW Air Quality
Mail Stop 60130

MAILING ADDRESS:
Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225

STREET LOCATION:
134 Union Blvd.
Lakewood, Colorado 80228

MAR 27 1991

RECEIVED
APR 1 1991
DER-BAQM

Mr. C.H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

We have reviewed the Final Determination pertaining to construction permits AC 45-190382 and 45-190383 for Container Corporation of America (CCA). These permits are for the construction and operation of a new batch digester system (C-line) at CCA's facility in Nassau County, Florida. The facility is located approximately 63 km east of Okefenokee Wilderness Area and 74 km south of Wolf Island Wilderness Area. Both are class I air quality areas administered by the U.S Fish and Wildlife Service. You may recall that in our letter of January 31, 1991, we raised some specific concerns regarding CCA's dispersion modeling methodology. We offer the following follow-up comments for your consideration.

First, we still believe that it was inappropriate to use a sulfur dioxide (SO₂) half-life in the CCA modeling analysis. The Final Determination justifies using this method because of its use on the St. Johns River Power Park project in Jacksonville, Florida. This method was inappropriate then, as it is now. As stated in our January 31, 1991, letter, the EPA Guidelines on Air Quality Models (Revised 1986) supports our conclusion that a half-life to account for chemical transformation is not an accepted modeling method for this situation because: 1) the modeling analysis submitted for assessing impacts in class I areas was done for a rural, not an urban, application using the rural mode in ISCST; 2) the class I areas are within a few hours of the source; and 3) appropriate documentation from site-specific studies for the coefficient which was used, was not provided.

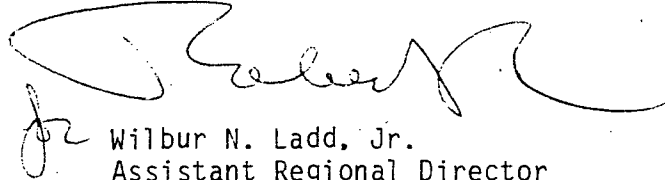
The Final Determination also states that when eliminating the half-life for SO₂, in computer dispersion modeling, four violations of the 24-hour SO₂ increment are predicted in the Okefenokee National Wilderness Area in Georgia. We assume the States of Florida and Georgia will revise their respective State Implementation Plans (SIP) addressing these predicted increment violations to conform with the mandates of the Clean Air Act. Please provide us with the schedule for these SIP revisions.

Second, regarding the use of significant impact levels, although CCA's contribution to the predicted increment violation may be less than 0.001 ug/m^3 , CCA is a contributor to air quality degradation in the area on a cumulative basis. Our concern over the potential air pollution impacts at Okefenokee Wildlife Refuge continues, and once the effects threshold is reached, any increase, even 0.001 ug/m^3 , in refuge concentrations may be considered "significant" and/or "adverse". We are approaching the threshold for effects on sensitive resources at the refuge.

In the enclosure to our January 31, 1991, letter, we discussed in detail our concerns with the use of predetermined significant impact levels with respect to class I impacts. Basically, these significance criteria may not offer the protection we need to be assured that a particular project will not adversely affect the refuge. It is the Federal Land Manager's responsibility to determine if a proposed project would significantly impact a class I area. Therefore, for future class I impact analysis, we ask that you and permit applicants consult with us before concluding a certain impact level is "insignificant".

We await a written reply from you regarding the above comments. If you have questions regarding this matter, please contact Sandra Silva of our Air Quality Branch at (303) 969-2814.

Sincerely,



Wilbur N. Ladd, Jr.
Assistant Regional Director
Refuges and Wildlife, Region 6

cc: Jellell Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division
U.S. EPA, Region 4
345 Courtland St., NE
Atlanta, Georgia 30365



January 9, 1991

Mr. Tom Rogers
Bureau of Air Monitoring and Assessment
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

JAN 10 1991

DER-BAQM

Re: Container Corporation of America
Proposed Batch Digester and Brown Stock Washer
AC45-190382; AC45-190383; PSD-FL-165

Dear Mr. Rogers:

In response to the Department's letter request dated December 18, 1990, concerning the above-referenced permit applications, enclosed are two copies of a supplemental modeling analysis for the Container Corporation of America, Inc., paper mill. Supportive computer model printouts are being supplied to you under separate cover. After your review of this information, please call if you have any questions. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script that reads "David A. Buff". The signature is written in black ink and is positioned above the typed name and title.

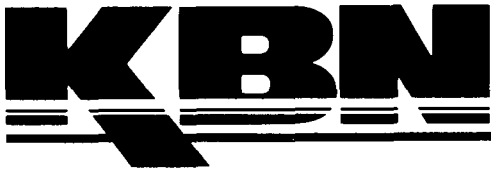
David A. Buff, M.E., P.E.
Principal Engineer

cc: Roger Hagan
Ron Caffo
Terry Cole
Roy Cobb

90017A2/4

KBN ENGINEERING AND APPLIED SCIENCES, INC.
1034 Northwest 57th Street Gainesville, Florida 32605 904/331-9000 FAX: 904/332-4189

EQUAL EMPLOYMENT OPPORTUNITY / AN AFFIRMATIVE ACTION EMPLOYER



December 21, 1990

Mr. Tom Rogers
Bureau of Air Monitoring and Assessment
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
DEC 24 1990
DER-BAQM

Re: Container Corporation of America
Proposed Batch Digester and Brown Stock Washer

Dear Mr. Rogers:

This letter is to confirm the agreements reached in our recent telephone conversation related to further modeling analysis for the above-referenced permit applications. The further modeling is necessary based on the Florida Department of Environmental Regulation's (FDER's) position that PSD is triggered for several pollutants as a result of the proposed project. The net increases in emissions were presented in KBN's report submitted to FDER on December 17, 1990. These emission increases were accepted by FDER; however, the reductions from the shutdown of Power Boiler No. 4 were determined not to be creditable. Based solely on the increases in emissions as a result of the proposed batch digester and brown stock washer, PSD is triggered for the following pollutants: total suspended particulate matter [PM(TSP)], particulate matter less than 10 μm diameter (PM10), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), beryllium (Be), and sulfuric acid mist (H₂SO₄). These pollutants, therefore, require a PSD modeling analysis.

The agreements concerning the modeling analysis necessary to satisfy PSD requirements are summarized below:

1. For the criteria pollutants, which have defined significant impact levels, only the increase in actual emissions caused by the proposed modification will be modeled initially (annual average emission changes documented in the December 17 submittal; short-term averaging time changes to be documented by CCA/KBN). The modeling also will consider the proposed increase in stack height on Power Boiler No. 5.
2. For those criteria pollutants for which the increase in actual emissions results in an insignificant impact, as determined in item 1 above, no further modeling will be required except for the PSD Class I areas (see item 4 below).
3. For those criteria pollutants for which the increase in actual emissions results in a significant impact, as determined in item 1 above, further modeling will be required. The modeling would be essentially the same as the previous modeling submitted by KBN (i.e., address compliance with ambient air quality standards and PSD

Nothing greater than significance

KBN ENGINEERING AND APPLIED SCIENCES, INC.

1034 Northwest 57th Street Gainesville, Florida 32605 904/331-9000 FAX: 904/332-4189



Only comments

also any sources outside
SIA that would
have impact on the
SIA

increments); however, the significant impact area (SIA) for the CCA mill would be defined, and all major sources within the SIA would be modeled to determine total air quality impacts. Also, those sources located within 50 km of the SIA will be considered in the annual average modeling analysis (per PSD Workshop Manual). The North Carolina screening method will be used to screen potential sources.

4. SO₂ impacts upon the PSD Class I areas will be updated to include other increment-consuming sources within the SIA. As a minimum, the St. Johns River Power Park and Cedar Bay cogeneration projects will be included. The previous modeling has demonstrated that the PM and NO₂ impacts upon the Class I areas are negative or close to zero, and that further modeling of these pollutants in the Class I area is not necessary.
5. The impacts of Be and H₂SO₄ emissions will be evaluated in relation to FDER's toxics policy, which defines acceptable ambient concentration (AAC) levels for each toxic pollutant. CCA's total impacts for these two pollutants will be evaluated and compared to the AAC's.

By copy of this letter, CCA is requesting that Steve Smallwood and his permitting staff also review this agreement. If FDER has any comments as to whether the additional information, as outlined above, will be sufficient to conclude the evaluation of this proposed project, please relate them to me by January 3, 1991.

KBN is planning to submit the required analysis to CCA before the January 10, 1991, deadline. Thank you for your cooperation in this matter.

David A. Buff

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

DAB/dmw

cc: Roger Hagan
Terry Cole
Bob Williams

visibility analysis
for all applicable
pollutants

ITT sent us blue print from factory & from one
of their engineers

Get Twachtmann's order - see J. Pennington

CCA

5 Nov 90

SO₂ ambient air quality std problem

Power Boiler #5 is a problem

a. raised stack 30

b. limit oil burning

Interaction w/ ITT Rayonier - ~~no problem~~

in area of ITT is problem 3 - stacks 120

Predicted violations of 24 hour AAQS

CCA significantly contributing to violation by EPA definition

CCA is not increasing emissions

Permitted limits

RBM: Accept modeling as reasonable assurance
Before they come in for any more cx permits -
While in determination that there is a modeled
violation.

Leave it Non-PSD

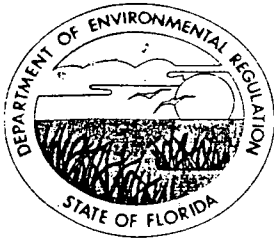
No control A/B Brown Stack Washer Ideas

In air quality analysis
No Cx Permits yet

P.B. No. 5

R.B. No. 4

federal enforceability - public notice is crux



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

December 5, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Steven D. Olsen, General Manager
ITT Rayonier Inc.
P. O. Box 2002
Fernandina Beach, Florida 32034-2002-

Dear Mr. Olsen:

Re: Correction of Fernandina Beach Area Sulfur Dioxide
Ambient Air Violations

There have been two measured exceedances of the state's 24-hour SO₂ ambient air quality standard of 260 ug/m³ at the Fernandina Beach monitoring site during 1990, both of which the Department has reason to believe were caused by emissions from the ITT Rayonier facility. In addition, as a result of a recent air construction permit application for Container Corporation of America (CCA), air quality modeling was performed. This modeling predicts other sulfur dioxide exceedances near ITT Rayonier, with CCA contributing approximately 20% and ITT about 80%. To correct these problems, the Department intends to modify the affected air permits for ITT by issuing a corrective order within approximately ten days, and to modify the pending air construction permit for the CCA facility.

The Department has developed the following list of possible strategies to be employed to resolve the actual and modeled SO₂ violations of the state's 24-hour ambient air quality standard of 260 ug/m³ in the Fernandina Beach area:

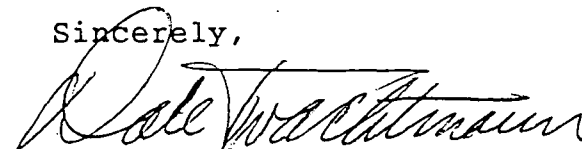
1. Raising stacks as necessary (consistent with Rule 17-2.270, F.A.C.);
2. Lowering sulfur content of fossil fuel(s) burned;
3. Switching to alternative fuels; and
4. Adjusting hourly or daily operating conditions, including possible shutdowns.

Mr. Steve D. Olsen
Page Two
December 5, 1990

If you would like to have input into the specific provisions to be included in the corrective order, please write to me at the above address. I will consider all recommendations received prior to noon Friday, December 14, 1990.

To be acceptable, your recommendations need to ensure that each sulfur dioxide concentration that is in excess of the standard, at each ground level location where the approved models predict a violation, will be reduced, as a minimum, in proportion to your facility's contribution to the violation. The reduction may be achieved as a result of raising stack heights (within allowable limits) and/or establishing new federally enforceable maximum allowable emission limits for the affected sources. The actual stack height increases and sulfur dioxide emission reductions must occur as soon as technically possible.

Sincerely,



Dale Twachtmann
Secretary

DT/kt

cc: S. Smallwood, DARM
E. Frey, NE District



12/06/90
90017

Mr. Max Linn
Bureau of Air Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

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DEC 07 1990

DER-BAQM

Dear Max:

I have enclosed a high-density floppy disk containing 11 ISCST input files used for our Container Corporation of America modeling. The eleven files are for SO₂ AAQS, with the files differing only by receptor grid, and/or the number of sources (screening and refinement modeled sources). I have also included some source contribution runs to facilitate your effort. Should you need any other data or have some questions relating to these files, please don't hesitate to call me.

Sincerely yours,

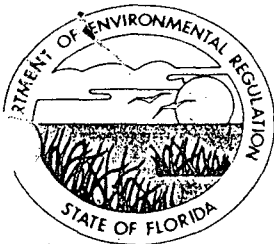
A handwritten signature in cursive script that reads "Steven R. Marks".

Steven R. Marks
Senior Meteorologist

KBN ENGINEERING AND APPLIED SCIENCES, INC.

1034 Northwest 57th Street Gainesville, Florida 32605 904/331-9000 FAX: 904/332-4189

EQUAL EMPLOYMENT OPPORTUNITY / AN AFFIRMATIVE ACTION EMPLOYER



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachimann, Secretary

John Shearer, Assistant Secretary

June 28, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Wayne Barlow
V.P. and General Manager
Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

Dear Mr. Barlow:

Re: Applications to Construct Air Pollution Sources
AC 45-181406: Batch Digester No. 8
AC 45-181407: C-Line Brown Stock Washer

The Department has reviewed the above referenced application packages received May 31, 1990. Based on a review of the material, the applications are deemed incomplete. Please submit to the Bureau of Air Regulation the following information, including all assumptions, calculations and reference material, and the status will, again, be ascertained:

- A. AC 45-181406: Batch Digester No. 8
1. What is the capacity of the new batch digester in terms of cubic feet? What is the maximum raw materials and chemicals that can be digested/processed in a single batch mode and hourly basis? What is the maximum product that can be attained in a single batch mode and hourly basis and in terms of air dried unbleached pulp (ADUP).
 2. Referencing No. A.1., provide the same information on the existing batch digesters Nos. 1-7.
 3. Calculate the annual actual TRS and its equivalent SO₂ emissions from the existing batch digester system, which should reflect the average of the actual hours of operation of the two highest years, but within the last five years, multiplied times the actual pollutant emission rate (either measured or an acceptable emission factor).

Mr. Wayne Barlow
Page Two
June 28, 1990

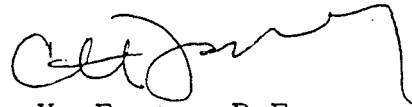
4. Compare the values obtained in No. A.3. to the newly proposed potential pollutant emissions in order to establish the net change in pollutants.
 5. If any source or system (i.e., MEEs, RBs, SDTs, lime kiln, slakers, etc.) will be affected by this modification request, please calculate the net changes of all affected pollutants (actuals vs. future potentials) on a per source or system basis.
 6. If the total net changes of any pollutant exceeds the levels contained in Table 500-2, F.A.C. Chapter 17-2, than submit the necessary information to satisfy the requirements of F.A.C. Rule 17-2.500(5), Prevention of Significant Deterioration - New Source Review.
 7. In Attachment B, Section I.B., what is the 1.07 factor in the denominator represent and what is its derivation based on?
- E. AC 45-181407: C-Lime Brown Stock Washer
1. What is the maximum hourly change in terms of raw materials and chemicals/used and in terms of product, both bone dry and ADUP, from the current existing system and with the addition of the new C-Lime Brown Stock Washer?
 2. Referencing No. B.1., calculate the net change in pollutant emissions (actuals vs. future potentials).
 3. If any source or system (i.e., MEEs, RBs, SDTs, lime kiln, slakers, etc.) will be affected by this modification request, please calculate the net changes of all affected pollutants (actuals vs. future potentials) on a per source or system basis.
 4. If the total net changes of any pollutant exceeds the levels contained in Table 500-2, F.A.C. Chapter 17-2, than submit the necessary information to satisfy the requirements of F.A.C. Rule 17-2.500(5), Prevention of Significant Deterioration - New Source Review.
 5. In Attachment A., Section III.B, Emission Calculations, an error in the molecular weight of H_2S is noted. Please correct and recalculate the potential TRS emissions. Also, recalculate the efficiency of the proposed scrubber system.

Mr. Wayne Barlow
Page Three
June 28, 1990

In addition to the incompleteness issues raised above, the Department may not be able to issue the requested construction permits due to the pending Department enforcement action and in accordance with F.A.C. Rule 17-4.070(5), Standards for Issuing or Denying Permits.

If there are any questions, please call Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/BM/t

attachments

cc: A. Kutyna, NE District
D. Buff, P.E., KBN
C. Forthman, OGC
D. Schwartz, OGC
J. Chisolm, OGC
J. Subramani, O, H, F & C



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

APR 4 1990

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APR 09 1990

DER-BAQW

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400.

RE: Florida Crushed Stone (PSD-FL-091)

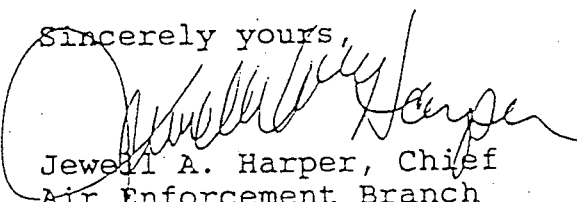
Dear Mr. Fancy:

This is to acknowledge receipt of your letter dated March 15, 1990, transmitting a request by Florida Crushed Stone to amend their prevention of significant deterioration (PSD) permit to allow the burning of tire derived fuel (TDF) in their cement kiln. The current permit for the source limits the fuel of the kiln to coal only. As discussed between Mr. Bruce Mitchell of your staff and Mr. Gregg Worley of my staff on March 30, 1990, we have the following comments.

Under the scenario presented by the source, the switch to the use of TDF in the kiln would not constitute a major modification for the purposes of PSD provided that the increase in pollutants due to the fuel switch did not exceed significant emissions increase levels. It is important to note that the change in emissions must be evaluated from "old actual" to "new allowable" emissions. The old actual emissions must be based on the previous two years of operating data unless some other period is deemed to be more representative of normal operating conditions. The new allowable emissions will be those emissions which are reflected in the amended permit. Also, it was noted that the list of pollutants to be tested did not include benzene. Since benzene is a pollutant regulated under the Clean Air Act for which a significant emissions rate has not been established, any increase of emissions of benzene would subject the source to PSD.

Thank you for the opportunity to review and comment on this package. If you have any further questions or comments, please do not hesitate to contact Mr. Gregg Worley of my staff at 404/347-2864.

Sincerely yours,


Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

APR 4 1990

4APT-AEB

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APR 09 1990

DER-BAQW

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Seminole Kraft Corporation (PSD-FL-141)

Dear Mr. Fancy:

This is to acknowledge receipt of a package from your office transmitting a request from Seminole Kraft Corporation to modify their prevention of significant deterioration (PSD) permit, dated February 16, 1990. As discussed between Mr. Pradeep Raval of your staff and Mr. Gregg Worley of my staff on March 30, 1990, we have the following comments.

CREDITABLE EMISSIONS REDUCTIONS

The source has requested that conditions be placed in the PSD permit to allow them the flexibility to convert to 100% recycled fiber in lieu of constructing the new recovery boiler. In the event that the source makes the decision to convert to recycled fiber, the source would like to retain emissions credit for the units which would be shut down at the facility (i.e., the existing kraft pulp mill). The credit for shutting down any units may be retained but we must emphasize that such credit must be based on actual operating data from the two years previous to the shutdown, unless another time period is determined to be more representative of actual operating conditions. The information submitted by Seminole Kraft is based on the years 1983-84. Apparently the source used the operating hours of this time period along with presently permitted allowable emission rates to arrive at their creditable emission reductions. This is not acceptable. We would suggest that it would be prudent of FDER to require testing of the units prior to shutdown for the pollutants which are to be credited. In any case, the actual emission rates must be used rather than the permitted allowable rates unless the actual emissions exceed the allowable emissions.

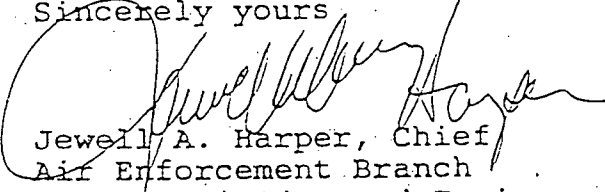
In a related matter, we do not think it is wise to include as a permit condition the language suggested by the source in provision 15 (d) which specifies what credits are available prior to the shutdown of the units. It appears that such a provision would lock FDER into accepting those numbers as creditable emissions no matter what the source operation was prior to shutdown. The fact that emissions resulting from federally enforceable shutdowns are creditable does not need to be established in a permit; the fact that such emissions are creditable is already established in federal and Florida regulations. In addition, the contemporaneous time period for which the emissions are creditable is established in regulations. Thus, it is redundant to state that "...the following emissions reductions will be available to Seminole Kraft for five (5) years from the date construction on this alternative is complete or November 12, 1992, whichever is earlier." By establishing a federally enforceable shutdown date at the completion of construction or November 12, 1992, whichever is earlier, it is understood that emissions credit is available for a period of five years from that point.

EFFECT ON THE AES CEDAR BAY PROJECT

The AES project which is currently under review for permitting plans to use the ambient impacts of shutting down several units at Seminole Kraft in their air quality analysis. How will the proposed permit amendment by Seminole Kraft affect the AES project?

Thank you for the opportunity to review and comment on this proposal by Seminole Kraft. If you have any questions or comments on this matter, please do not hesitate to contact Mr. Gregg Worley of my staff at 404/347-2864.

Sincerely yours



Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division