State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

31/65/0003/15

Permit Signed 3/12/81

TO: Victoria J. Tschinkel, Secretary, FDER

FROM: for Steve Smallwood, Chief, BAQM

DATE: March 10, 1981

SUBJ: Approval and Signature - Container Corporation of America, Air Construction Permit AC 45-35532

Attached please find one Air Construction Permit for which the applicant is Container Corporation of America. The proposed construction is a new coal/wood-waste boiler with coal preparation and handling facilities to be located in Nassau County, Florida.

Day 90, after which the permit would be issued by default is March 12, 1981.

The Bureau recommends your approval and signature.

SS:dav

Final Determination

Container Corporation of America

Fernandina Beach

Nassau County, Florida

Construction Permit

Application Number:

AC 45-35532

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

March 9, 1981

Final Determination

Container Corporation of America's (CCA) application for a permit to construct a coal/wood-waste boiler at an existing site located on the island side of Amelia Island in Nassau County, Florida has been reviewed by the Bureau of Air Quality Management. Public notice of the Department's Intent to Issue the construction permit was published in the Jacksonville's Florida Times-Union on February 2, 1981.

Copies of the preliminary determination have been made available for public inspection at the Department's St. Johns River Subdistrict Office in Jacksonville and the Department's Bureau of Air Quality Management in Tallahassee.

The only comments received on the proposed construction permit were from CCA, the applicant. Their comments pertained to: (1) Permit Specific Condition No. 1 - reporting of construction delays; (2) Permit Specific Condition No. 3 - continuous monitoring requirements; (3) Permit Specific Condition No. 9 - sulfur content limit of the coal; (4) Permit Specific Condition No. 11 - shutdown date of existing boilers for offset purposes; and (5) the expiration date of the construction permit.

CCA felt that reporting of delays should be required only if the delays would extend completion beyond the expiration date of the construction permit. The Department is in agreement with CCA on this matter and believes Specific Condition No. 1 implies this. For this reason, the Department has chosen not the change the Condition No. 1.

CCA noted that some of the continuous emission monitoring systems required in Specific Condition No.3 can be waived as provided in 40 CFR Section 60.45(b). The Department agrees with CCA on this matter.

CCA requested that the limitation on sulfur content in the coal be waived. If the request is not acceptable, CCA asked that this limitation take into account both the heating value of the coal and the sulfur retained in the flyash. The Department has chosen not to waive the limitation on sulfur content in the coal because CCA proposed the use of low sulfur coal as BACT for sulfur dioxide emission control. The Department will allow credit for sulfur compounds retained in the flyash and for the heating value of the coal in determining the maximum allowable sulfur in the coal.

CCA requested that the existing boilers used for offset purposes be allowed to operate for a limited time after the new boiler commences operation. Compliance with Condition No. 5 would require the new boiler to be in a fully operational status. The technical evaluation relied on shutdown of the existing boilers to provide emission credits for the new boiler. For this reason, the Department has chosen not to change Condition No. 11.

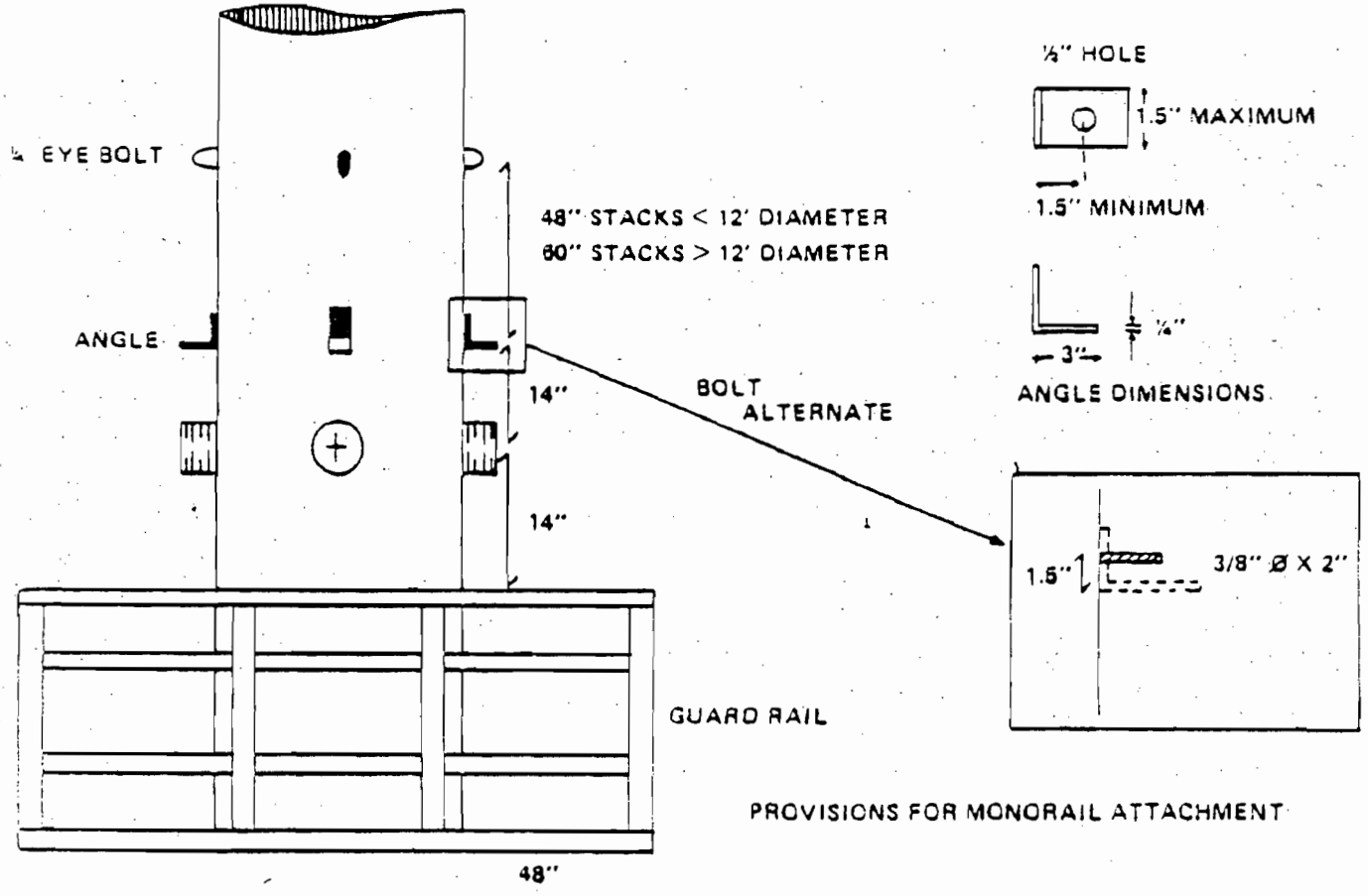
CCA requested that the expiration date for the construction permit be changed from January, 1983 to September 30, 1983 to allow time to bring the new boiler on stream and make the emission compliance test within the time frame established on the construction permit. The Department believes this request is reasonable and has adjusted the expiration date of the construction permit.

The requirements for dust control of the coal preparation and handling facilities which were discussed in the technical evaluation, have been added to the specific conditions.

Several minor changes to other specific conditions were made to clarify the Department's intent.

The final action by the Department will be to issue the permit with the changes noted above.

AN EYEBOLT AND ANGLE SHALL BE ATTACHED DIRECTLY ABOVE EACH PORT OF VERTICAL STACKS AND ABOVE EACH VERTICAL SET OF PORTS FOUND ON THE SIDES OF HORIZONTAL DUCTWORK 1.8 WORKING PLATFORMS. THE DIMENSIONS AND PLACEMENT OF THESE FIXTURES ARE SHOWN IN FIGURE 1-1.



PROVISIONS FOR MONORAIL ATTACHMENT

IF EYEBOLT IS MORE THAN 120 INCHES ABOVE THE PLATFORM A PIECE OF CHAIN SHOULD BE ATTACHED TO IT TO BRING THE POINT OF ATTACHMENT WITHIN SAFE REACH. THE EYEBOLT SHOULD BE CAPABLE OF SUPPORTING A 500 POUND WORKING LOAD.

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AC 45-35532

CONTAINER CORPORATION OF
AMERICA

DATE OF ISSUANCE

March 1, 1981

DATE OF EXPIRATION

SEPTEMBER 30, 1983

Ellen Smith for

VICTORIA J. TSCHINKEL,
SECRETARY

DER FORM PERM 11-42

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAH
GOVERN

JACOB D. VA
SECRETA

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

PERMIT/CERTIFICATION
NO. AC 45-35532

COUNTY: Nassau

PROJECT: Coal/Wood Boil

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a coal/wood waste boiler, capable of generating 825,000 pounds of steam per hour at 825°F and 850 psig, controlled by a multiclone collector and an electrostatic precipitator (or equivalent control equipment) at an existing plant located on the inland side of Amelia Island, in Nassau County, Florida. The UTM Coordinates of the proposed plant are 456.213E and 3394.186N.

Construction shall be in accordance with the attached permit application, and plans, documents and drawings except as otherwise noted on pages 3 and 4, "Specific Conditions".

Attachments:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16).

2. Container Corporation of America, Responses to Technical Discrepancies, December 12, 1980.

3. Stack sampling drawing.

PERMIT NO.: AC 45-35532
APPLICANT: Container Corporation of America

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions:, and as such are bi... ing upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby pu... on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit C... ditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unau... rized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revo... tion and enforcement action by the department.

3. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specifie... this permit, the permittee shall immediately notify and provide the department with the following information: (a) a description ... and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the an... pated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the ... compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement actio... the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or an... clusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infri... ment of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construc... or operation.

6. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information re... lating to the construction or operation of this permitted source, which are submitted to the department, may be used by the depa... ment as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscri... by Section 403.111, F.S.

7. In the case of an operation permit, permittee agrees to comply with changes in department rules and Florida Statutes after ... reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or ... partment rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aqua... life or property and penalities therefore caused by the construction or operation of this permitted source, nor does it allow the ... mittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an or... from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee s... notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permi... shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by ... partment personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit ... department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects ... the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not cons... tute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have be... obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

[X] Determination of Best Available Control Technology (BACT)
[X] Determination of Prevention of Significant Deterioration (PSD)
[ ] Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 45-44532
APPLICANT: Container Corporation of America

SPECIFIC CONDITIONS:

1. Construction shall reasonably conform to the plans and schedule given in the application. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.

2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the source.

3. Based on the New Source Performance Standard, 40 CFR 60.45 (a) and (b), as referenced by 17-2.21(2)(a), the applicant shall install, calibrate, maintain and operate continuous monitoring systems for measuring the opacity of emissions, nitrogen oxides emissions, and either oxygen or carbon dioxide except as provided in 40 CFR 60.45(b).

4. Before the construction permit expires, the proposed boiler will be sampled for pollutant emissions. Test procedures will be EPA reference methods 1, 2, 3, 5, 6, 7, and 9 as in 40 CFR 60, Appendix A or other state approved methods. Minimum sampling time and volume will be as specified in new source performance standard for this type of source. Stack sampling facilities will include the eyebolts and angle described in the attached figures.

5. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to St. Johns River Subdistrict Office prior to 90 days before the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or until issuance of an operating permit.

6. Upon obtaining an operating permit, the applicant will be required to submit periodic reports on the actual operation and emissions of the source. These reports will give emissions test data, emission test results, scrubber parameters (pressure drop and water flow, pH), fuel composition and amount of steam produced.

7. Fuel oil may be used for start-ups, shut-down, and stand-by when coal is not available. The oil will have a maximum sulfur content of 2.5%.

PERMIT NO.:
APPLICANT:

8. Coal fuel is limited to a maximum sulfur content calculated from the following formula:

   Maximum allowable = $6.32 \times 10^{-5} \times$ (BTU per lb coal)
   sulfur, per cent.

9. Maximum emission limits are:

Pollutant	lb/MMBTU	lb/hr
Particulate	0.1	102
SO_2	1.2	1,225
NO_x	0.6	612
Opacity	20% except 27% for one 6 minute period per hour.	

10. The maximum hours of operation shall be 8,400 hours per year.

11. As soon as the applicant submits an operating permit application for this boiler, the No. 3 recovery boiler and its associated smelt tank, and the No. 6 power boiler will be retired, and the No. 3 power boiler will be put on "cold" stand-by. The No. 3 power boiler will not be operated while the new boiler is in operation any time afte the application for a permit to operate the new boiler is submitted to the Department.

12. Dust supression systems shall be incorporated in the coal preparation and handling facilities. The system will include: (a) a bottom discharge system empolying side curtains and surfactant spray for coal unloading operations; (b) housing the coal crusher in the power boiler building; (c) surfactants control in conjunction with the coal pile; and (d) covered conveyors to transport the coal.

Expiration Date: September 30, 1983

Issued this 12 day of March, 1981

_____ Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Signature

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

M E M O R A N D U M

TO: Mr. R. W. Galphin, Container Corporation of America
Mr. G. Doug Dutton, St. Johns River Subdistrict

FROM: for Steve Smallwood, Chief, Bureau of Air Quality Management
Laurens Alsenge

DATE: January 29, 1981

SUBJ: Container Corporation of America - Application for Permit to Construct Coal/Wood-waste Boiler.

Attached is one copy of the Application, Technical Evaluation and Preliminary Determination, BACT Determination, and proposed permit to construct a coal/wood-waste boiler at Fernandina Beach, in Nassau County, Florida.

Please send any comments you wish to have considered concerning this action to Willard Hanks of the Bureau of Air Quality Management.

SS:caa

1/20/81 Tech; Prelim Determination

Technical Evaluation
and
Preliminary Determination

Container Corporation of America

Fernandina Beach

Nassau County, Florida

Construction Permit
Application Number:
AC 45-35532

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting
January 20, 1981

I. PROPOSED DEPARTMENT ACTION:

The Department intends to issue the requested permit to Container Corporation of America (CCA) for the construction of a coal/wood-waste boiler, capable of generating 825,000 pounds of steam per hour at 825°F and 850 psig, at the Fernandina Beach mill located on the inland side of Amelia Island, Florida. The permit will include conditions to assure compliance with Chapter 17-2, F.A.C.

Any person wanting to comment on this action may do so by submitting such comments in writing to:

Willard Hanks
Florida Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the issuance or denial of this permit may request an administrative hearing by filing a petition for hearing as set forth in Section 28-5.15, F.A.C. (copy attached). Such petition must be filed within 14 days of the date of this notice with:

Mary Clark
Florida Department of Environmental Regulation
Office of General Counsel
2600 Blair Stone Road
Tallahassee, Florida 32301

II. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS:

a. The proposed source is a major emitting facility of particulate, sulfur dioxide, nitrogen oxides, and carbon monoxide because the potential emission of each pollutant is greater than 100 tons per year. Therefore, application of Best Available Control Technology (BACT) is required for each of these pollutants.

b. The proposed source location at Fernandina Beach is in that portion of Nassau County which is classified as the "area of influence" for the Duval County particulate nonattainment area. An air quality analysis has been performed which demonstrates that, after application of BACT, particulate emissions from the source will not have a "significant" impact on the nonattainment area.

c. The air quality analysis further demonstrates that, after the application of BACT, emissions of all pollutants will neither cause nor contribute to ambient concentrations in excess of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment.

III. SYNOPSIS OF APPLICATION:

a. Name and Address of Applicant:

Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

b. Description of Project:

The proposed project is a new coal/wood-waste power boiler which will replace existing power boilers No. 3 and No. 6, and recovery boiler No. 3 and its associated smelt tank. The new boiler, capable of generating 825,000 pounds of steam per hour at 825°F and 850 psig, will be designed to burn either 100% coal or a mixture of up to 30% woodwaste based on heat value, which is approximately a 50/50 mixture based on fuel weights.

Auxiliary equipment includes an economizer, fans and drives, air preheater, instrumentation, breaching and duct work, and related piping to comprise a fully operational boiler installation.

The coal handling and preparation facilities, designed to deliver a nominal 41 tons of coal per hour, consist of the unloading area, storage area, preparation facility, and conveyor system.

c. Description of Process and Controls:

Particulate control equipment for the proposed power boiler consists of a multiclone collector followed by an electrostatic precipitator or equivalent control equipment. The overall design collection efficiency of the mechanical collectors will be 65% on wood waste and 35% on coal. The design efficiency of the electrostatic precipitator will be 99%.

For sulfur dioxide emission control, CCA proposes the use of Eastern (or Mid-Western) low sulfur content, bituminous coal. The sulfur content in the coal is limited to 0.75% based on a heating value of 12,500 BTU/lb, in order to meet the New Source Performance Standard (NSPS) limit of 1.2 pounds of SO_2 per million BTU generated.

To limit nitrogen oxides emissions to 0.6 lb/MMBTU, CCA proposes the use of staged combustion and low excess air techniques.

A dust supression system will be incorporated in the coal preparation and handling facilities. Coal unloading will be accomplished through a bottom discharge system employing side curtains and surfactant spray. The coal crusher will be housed in the power boiler building to minimize fugitive dust. Surfactants will be used in conjunction with the coal pile as will compaction of the pile itself to minimize fugitive dust. Conveyors to transport the coal will be covered.

IV. RULE APPLICABILITY:

The proposed source is to be located in an area classified as attainment for all pollutants; however, the location is within the "area of influence" of the Duval County particulate nonattainment area (17-2.13). The proposed source is a major source of particulate (17-2.02(6) and 17-2.17(1)(c)2.c) and therefore exempt from the nonattainment rule only if reasonable assurance is provided that the source will not have a significant impact on the nonattainment area (17-2.17(3)(a)1.a.(ii)). The proposed source is also a major emitting facility with respect to particulate, sulfur dioxide, nitrogen oxides, and carbon monoxide, and therefore subject to the PSD provisions of 17-2.04 for particulate and SO_2 emissions and to the BACT requirements of 17-2.03 for all of the above pollutant emissions.

V. FINDINGS:

1. BACT has been determined, as required by 17-2.03, for particulate matter, sulfur dioxide, and nitrogen oxides from the proposed boiler and the coal preparation and handling systems. A copy of this determination is attached. The BACT emission limits are as follows:

Pollutant	Maximum Emission Limit
Particulate Matter	0.1 lb/MMBTU input
Sulfur Dioxide	1.2 lb/MMBTU input
Nitrogen Oxides	0.6 lb/MMBTU input
Opacity	Not to exceed 20%

2. After application of BACT, total maximum emissions are projected to be equal to or less than the amounts shown in the following table:

Source	Particulate		Sulfur Dioxide		Nitrogen Oxides	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler	102.1	429	1,225	5,142	612	2,570
Coal Handling System		7.2				

3. Dispersion modeling for particulate emissions indicates that after application of BACT emissions from the proposed source will have no significant impact on the Duval County particulate nonattainment area.

4. The proposal in this application includes retiring the No. 6 power boiler, the No. 3 recovery boiler and its associated smelt tank, and placing No. 3 power boiler on "cold" standby.

5. Dispersion modeling for particulate and SO_2 emissions indicates that after application of BACT and shut-down of other sources as detailed above, emissions from the proposed source will neither cause nor contribute to ambient concentrations in excess of any ambient air quality standard or PSD increment.

6. The boiler will operate 8,400 hours per year, with a maximum capacity of approximately 825,000 pounds of steam per hour.

7. Fuel oil with 2.5% maximum sulfur content will be used for start-ups and emergencies.

VI. PROPOSED ALLOWABLE EMISSIONS AND PERMIT CONDITIONS:

See Draft Permit.

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

PERMIT/CERTIFICATION
NO. AC 45-35532

COUNTY: Nassau

PROJECT: Coal/Wood Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a coal/wood waste boiler, capable of generating 825,000 pounds of steam per hour at 825°F and 850 psig, controlled by a multiclone collector and an electrostatic precipitator (or equivalent control equipment) at an existing plant located on the inland side of Amelia Island, in Nassau County, Florida. The UTM Coordinates of the proposed plant are 456.213 E and 3394.186 N.

Construction shall be in accordance with the attached permit application, and plans, documents and drawings except as otherwise noted on pages 3 and 4, "Specific Conditions".

1. Application to Construct Air Pollution Sources, DER Form 17-2.122(16).
2. Container Corporation of America, Responses to Technical Discrepancies, December 12, 1980.
3. Stack sampling drawing.

PERMIT NO.: AC 45-35532
APPLICANT: Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions:, and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

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

7. In the case of an operation permit, permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalities therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

[X] Determination of Best Available Control Technology (BACT)
[X] Determination of Prevention of Significant Deterioration (PSD)
[ ] Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 45-35532
APPLICANT: Container Corporation of America
North 8th Street
Fernandina Beach, Florida 32034

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions:, and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

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

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8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalities therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

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[X] Determination of Best Available Control Technology (BACT)
[X] Determination of Prevention of Significant Deterioration (PSD)
[ ] Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 45-44532
APPLICANT: Container Corporation of America

SPECIFIC CONDITIONS:

1. Construction shall reasonably conform to the plans and schedule given in the application. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.

2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the source.

3. Based on New Source Performance Standard 40 CFR 60.45, as referenced by 17-2.21(2)(a), the applicant shall install, calibrate, maintain and operate continuous monitoring systems for measuring the opacity of emissions, sulfur dioxide emissions, nitrogen oxides emissions, and either oxygen or carbon dioxide.

4. Before the construction permit expires, the proposed boiler will be sampled for pollutant emissions. Test procedures will be EPA reference methods 1,2,3,5,6,7, and 9 as described in 40 CFR 60, Appendix A or other state approved methods.

5. Stack sampling facilities will include the eyebolts and angle described in the attached figures.

6. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to St. Johns River Subdistrict Office prior to 90 days before the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or until issuance of an operating permit.

7. Upon obtaining an operating permit, the applicant will be required to submit periodic reports on the actual operation and emissions of the source. These reports will give emission test data, emission test results, scrubber parameters (pressure drop and water flow, pH), fuel composition and amount of steam produced.

8. Fuel oil may be used for start-ups, shut-down, and stand-by when coal is not available. The oil will have a maximum sulfur content of 2.5%.

9. Coal fuel is limited to a maximum of 0.75% sulfur.

PERMIT NO.: AC 45-33532
APPLICANT: Container Corporation of America

Specific Conditions (Con't)

10. Maximum emission limits are:

Pollutant	lb/MMBTU	lb/hr
Particulate	0.1	102
SO_2	1.2	1,225
NO_x	0.6	612
Opacity	20% except 27% for one 6 minute period per hour.	

11. The maximum hours of operation shall be 8,400 hours per year.

12. As soon as the applicant submits an operating permit application for this boiler, the No. 3 recovery boiler and its associated smelt tank, and the No. 6 power boiler will be retired, and the No. 3 power boiler will be put on "cold" stand-by. The Department will be notified whenever the No. 3 power boiler is placed into operation.

Jacob D. Varn,
Secretary

Expiration Date: January, 1983

Issued this _____ day of _____, 19_____.

_____ Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

_____
Signature

PERMIT NO.: AC 45-33532
APPLICANT: Container Corporation of America

Specific Conditions (Con't)

10. Maximum emission limits are:

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NO_x	0.6	612
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Jacob D. Varn,
Secretary

Expiration Date: January, 1983

Issued this _____ day of _____, 19____.

_____ Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

_____
Signature

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

(1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.

(2) All petitions filed under these rules should contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name and address of the petitioner or petitioners;

(c) All disputed issues of material fact. If there are none, the petition must so indicate;

(d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;

(e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;

(f) A demand for the relief to which the petitioner deems himself entitled; and

(g) Such other information which the petitioner contends is material.

Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary
Ernest Frey, Deputy Assistant Secretary

0 890003

April 30, 1990

RECEIVED
MAY 01 1990
DER-BAQM

Mr. Roger Hagan, Technical Manager
Container Corporation of America
Post Office Box 2000
Fernandina Beach, Florida, 32034

Re: Fly Ash Reinjection Into NR 7 Boiler

Dear Mr. Hagan:

You are authorized to conduct a trial in which #5 power boiler fly ash is reinjected into #7 power boiler for a period not to exceed ten days. I understand that you desire to conduct this extended trial in order to collect enough ash samples at steady state conditions to determine if the composite ash is suitable as an aggregate supplement for concrete block.

Based on the results of a previous test, the district does not require particulate tests to be conducted during this trial. However visible emissions should be observed and should not exceed permitted limits.

In addition it is advisable to measure the total fly ash input to #7 boiler since the fly ash input rate would be required should you apply for a permit modification.

Please notify this office when you plan to commence the trial.

Sincerely,

Andrew G. Kutyna, P.E.
District Air Program
Administrator

AGK:bt

cc: Clair Fancy

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

	Initial	Date
1. TO: (NAME, OFFICE, LOCATION) Claire Fancy BAR Room 306F		
2.		
3.		
4. Sally		

REMARKS:

Barry

Bruce - Is there a letter/package to the Dept. requesting this activity? Rule? The District needs to include all correspondence ass... with facility activities, since we(BAR) will end up processing permit activities.

Patty RECEIVED

MAY 01 1990

DER - BAQM

Bruce do memo

rcd 6-18-90 on the rebound. To draft a memo via B.A./CHF. RB 5-3-90

INFORMATION

- Review & Return
- Review & File
- Initial & Forward

DISPOSITION

- Review & Respond
- Prepare Response
- For My Signature
- For Your Signature
- Let's Discuss
- Set Up Meeting
- Investigate & Report
- Initial & Forward
- Distribute
- Concurrence
- For Processing
- Initial & Return

FROM: air/jay

DATE

PHONE

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

August 12, 1985

Mr. Richard S. DuBose, Chief
Air Compliance Section
Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. DuBose:

Nassau County - AP
Container Corporation of America (CCA)
Power Boiler No. 7
Alternative SO_2 Sampling Method

On October 15, 1984 Mr. Clair Fancy, Deputy Chief, Bureau of Air Quality Management, forwarded a request for review and comment on CCA's request for an alternate SO_2 sampling method. Mr. Jesse Baskerville responded in a memo to you on December 13, 1984. In that memo he took exception to the ASTM Method used for determination of gross caloric value.

Enclosed is our correspondence from CCA which indicates that the method which Mr. Baskerville recommended (ASTM D02015) is being used.

Please reevaluate the adequacy of the proposed method upon receipt of this information and advise BAQM/CAPS and this office.

Your assistance is greatly appreciated.

Sincerely,

John C. Brown, Jr.
John Brown, P.E.
Supervisor Air Section

JB:vk

cc: Rick Vail, w/attachments
Clair Fancy, w/attachments
Cynthia Sawyer, CCA

DER
AUG 14 1985
BAQM

Container Corporation of America

Paper Mill Division

P. O. Box 2000
North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-5551

August 8, 1985

Mr. John Brown
DER--Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Dear Mr. Brown:

This letter is in response to the memo from Mr. Jesse Baskerville, in which he stated that our proposed alternate method for showing SO_2 compliance is not acceptable. This was due to the referenced BTU analysis method not being used. I have discussed this deviation with Mr. Edwin Senlling of Commercial Testing, our independent testing laboratory. Mr. Snelling has reviewed the methods, and states that the ASTM method D02015 is used, and was an oversite on his part.

The attached letter confirms this error. The EPA memo states that with this clarification, our procedure for showing sulfur dioxide compliance by coal analysis is acceptable.

If you have any additional comments or questions, please do not hesitate to call.

Sincerely,

CONTAINER CORPORATION OF AMERICA

Cynthia L. Sawyer

Cynthia L. Sawyer
Environmental Group Leader

Enclosure

jrb

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV - ATLANTA, GEORGIA 30365

File PB#7 CCA

DATE: DEC 13 1984

SUBJECT: Request for Technical Assistance in the Review of the Request by Container Corporation of America, (CAA) Jacksonville, Florida for the use of an Alternative SO_2 Sampling Method

FROM: Acting Chief
Air Engineering Section

TO: Richard S. DuBose, Chief
Air Compliance Section

SUMMARY

The American Standard for Testing Materials (ASTM) Methods presently being used by the three (3) laboratories involved in the analysis of the "as shipped" coal for CCA meet the requirements of the proposed (October 21, 1983) Method 19A of 40 CFR 60, Appendix A, with the exception of the analytical technique, ASTM D3286, for Gross Calorific Value (GCV). The ASTM method required by Standard Reference Method 19A for GCV is D2015.

ACTION

Unless Container Corporation of America can provide this office with sufficient reasons for using D3286 instead of D2015, they should be advised to use the required GCV determination procedure.

BACKGROUND

Your memorandum to me dated October 17, 1984, with enclosures.

J Baskerville

Jesse Baskerville

COMMERCIAL TESTING & ENGINEERING CO.
GENERAL OFFICES: 1919 SOUTH HIGHLAND AVE., SUITE 210-B, LOMBARD, ILLINOIS 60148 • (312) 953-9300

WEST VIRGINIA DIVISION MANAGER
TOM BRAZEAU

PLEASE ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 808, CHARLESTON, WV 25323
OFFICE TEL. (304) 925-6631

July 10, 1985

Ms. Cindy Sawyer
Container Corporation of America
Mill Division, North 8th Street
Fernandina Beach, Florida 32034

Dear Ms. Sawyer:

In reference to my letter dated February 27, 1984. The ASTM determination of calorific value is done by Method D 2015-77 and not 3286-77 as I had stated. We are currently using the Parr 1730 controller, for the past three years we have used th Preiser model. Both are operated in accordance with D 2015-77 which is the Adiabatic method.(please see enclosed copy).

Both methods are very similar, the Adiabatic method uses a temperature probe to tract the temperature rise electrically where as the Isothermal uses mercury thermometers and temperature rises are recorded by eye.

We are sorry for the error and any inconviencience it may have caused you or your company.

Very truly yours,

COMMERCIAL TESTING & ENGINEERING COMPANY

Edwin B. Snellings, Manager
Charleston Office

EBS/fd

PARR CALORIMETER USERS CAN SELECT ANY OF SEVERAL EXCELLENT TEST METHODS

THE ADIABATIC METHOD

Users who prefer to use the classical adiabatic method will find the 1241 calorimeter ideally suited for this type of operation. Electronic controls developed specifically for this procedure monitor the jacket temperature and make continuous adjustments during a run, always keeping the jacket temperature equal to the temperature in the calorimeter bucket. By maintaining a zero temperature differential between these two zones, no heat leak corrections are required and only the initial and final temperatures are recorded. This continues to be the standard method for those who operate the calorimeter without the microprocessor controls provided by a Series 1700 controller.

A RAPID ADIABATIC/ DYNAMIC METHOD

By adding a Series 1700 controller to a 1241 calorimeter the user can select an Adiabatic/Dynamic method which will shorten the time required for a calorific test by as much as 50 percent or more without sacrificing any of the precision long associated with the 1241 calorimeter. Using this method, the controller not only monitors the temperature in the calorimeter but it also employs a sophisticated curve matching technique to compare the temperature rise with a known thermogram for the system. Using this comparison, the computer can predict the final maximum temperature without waiting for it to develop, making it possible to terminate the test and compute the calorific value of the sample in periods as short as 3½ minutes after firing.

A NEW ISOPERIBOL/ DYNAMIC METHOD

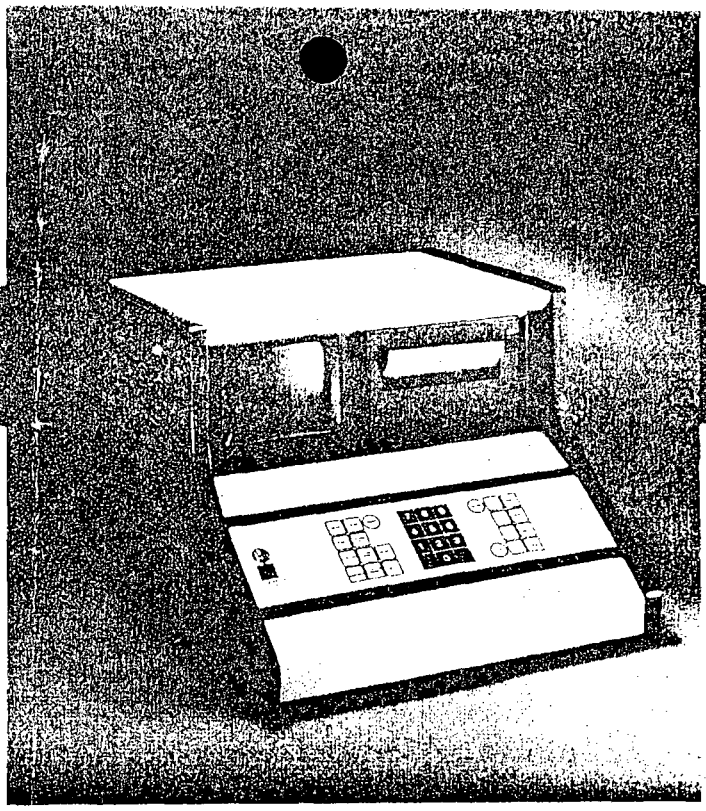
Each Series 1700 controller also provides a new optional Isoperibol/Dynamic test method developed by Parr to shorten the time required for an individual test and to reduce the water and energy needed to operate the calorimeter, while still maintaining the excellent precision attainable with the instrument. Using the Isoperibol/Dynamic method, tests are run with the jacket held at a constant temperature while the controller (1) monitors the temperature rise in the bucket, (2) performs the integration necessary to compute the heat leak based upon the maintenance of a fixed jacket temperature, and (3) applies the necessary heat leak correction to the observed temperature rise. The controller also employs the extrapolation feature described above to shorten the test time to an absolute minimum. This procedure can be supported with a closed circulating system in which the jacket water is recirculated and reused continuously with little or no make-up. Also, there is no waiting period and no water required to recycle the jacket back to the starting temperature at the end of each run.

The precision obtainable with the Isoperibol/Dynamic method is excellent and fully comparable to results obtained with the well established adiabatic method. This fact has been confirmed by extensive comparison tests, including a lengthy series reported by the Staff of Gould Engineering & Environmental Services, Ltd., Thornwood, New York (1). Their results from a series of duplicate tests for coal samples showed a standard deviation of 23.1 Btu for Isoperibol/Dynamic operation and 25.3 Btu for Adiabatic operation which, for all practical purposes, are identical. The average difference between results from Adiabatic and Isoperibol/ Dynamic tests was a mere 6 Btu/lb, which again is nearly identical. From these comparisons, the Gould investigators offer the following conclusions:

"We are satisfied that the isoperibol/dynamic method yields results that are directly comparable with those obtained with the conventional adiabatic calorimeter technique for the normal range of heating values most often encountered in our laboratory under normal operating environment. We believe the additional advantages of time saved, reduced water consumption, and easy retrofit to existing equipment makes the Parr Isoperibol/Dynamic Calorimeter Controller a viable route to consider for increasing productivity to keep cost down in many existing laboratory situations as well as for the new laboratory."

(1) This article, titled "Oxygen Bomb Calorimetry Steps Ahead" was published in CQ, The Journal of Coal Quality, Vol. 2 No. 3, Summer 1983. Reprints of the complete article can be obtained from the Parr Instrument Company without charge.

THE 1730 CONTROLLER



An advanced control system for rapid and precise calorific tests in laboratories where many samples must be run daily on a routine basis.

RECOMMENDED FOR

Coal mine, coal preparation plant, commercial inspection, coal burning utility and other industrial laboratories where large test loads must be handled daily. It will be particularly attractive to users making 200 or more tests per week. For those with larger volumes, this capacity can be doubled to 400 or more tests per week by adding a second 1241 calorimeter and operating both calorimeters from a single 1730 controller.

PROVIDES

- Automatic process control
- Precise electronic thermometry
- A dedicated microcomputer
- A CRT display
- Optional dual channel operation
- Complete menu driven operation
- Complete diagnostics
- A 40-column thermal printer
- Sealed, touch-panel controls
- Battery back-up
- Adaptable programming
- Selectable precision
- Optional memory expansion
- Optional interface with digital balance
- Optional communication with central computer
- Provision for future growth

The 1730 controller offers all of the features provided in the 1720 model described on page 14, **plus these important additions:**

Dual channel operation. The 1730 controller is readily expandable to operate two 1241 calorimeters at the same time.

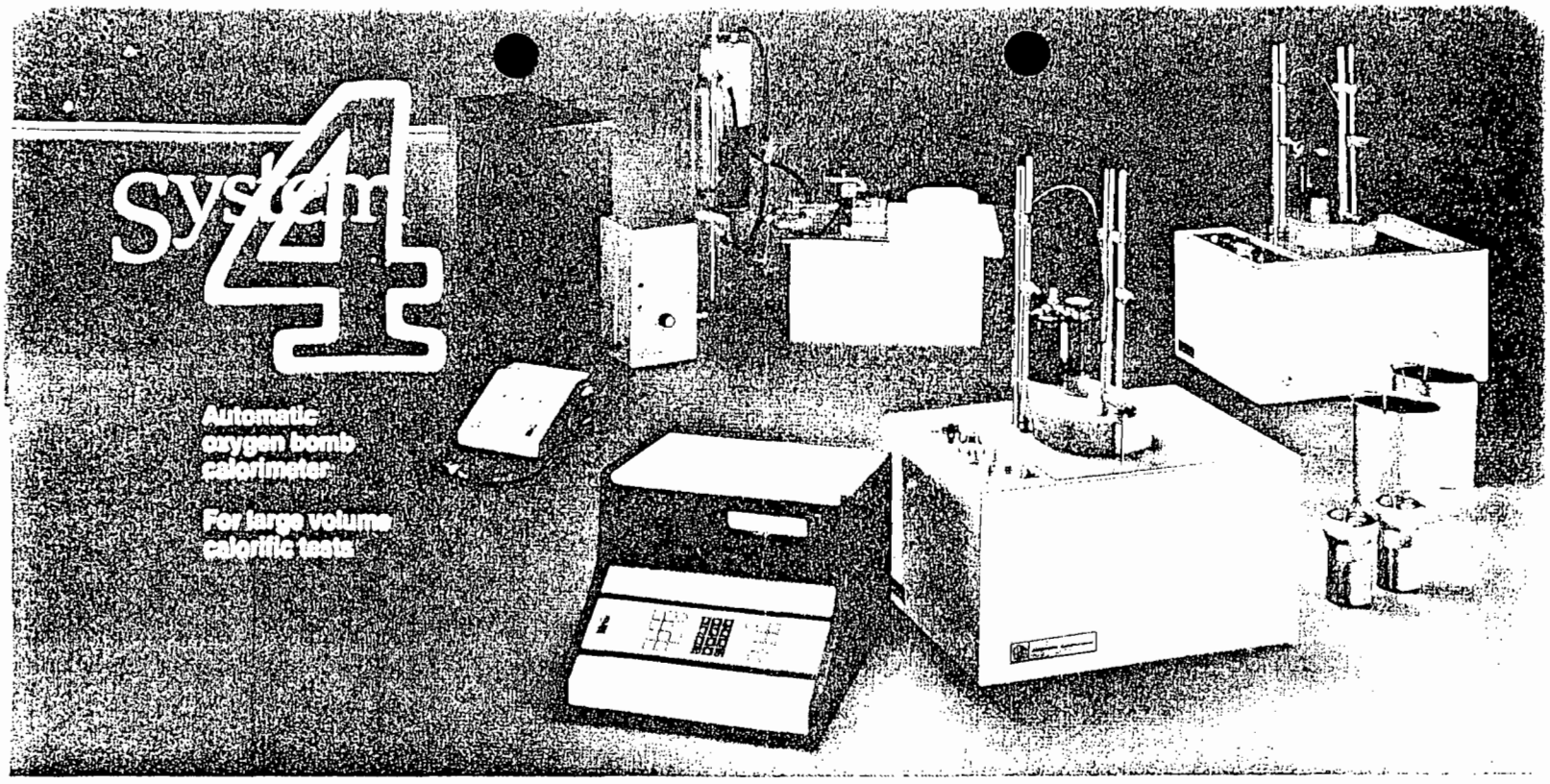
A CRT display. All data entry and verification, report review and system diagnostics in the 1730 controller are shown in a bright, CRT display for easy reading and great flexibility. All operating and system controls are entered through a menu driven program.

A 40-column thermal printer. A larger printer is installed in the 1730 model to accommodate the larger volume of data anticipated with this high capacity system.

Future enhancements. The 1730 controller will accept all accessories and future enhancements being developed by Parr to take advantage of the broad capabilities of this control system and to expand its usefulness in fuel testing laboratories.

ORDERING INFORMATION

1730 Calorimeter controller with thermistor probe, 115/230 v 50/60 Hz



System 4 is a complete automatic calorimeter system for users whose daily testing requirements exceed the capacity obtainable from System 3. It has the same components as System 3, with an additional 1241 calorimeter and an extra oxygen bomb and bucket. All of the features provided in System 3 are duplicated in System 4. More than one operator may be required to take full advantage of the maximum output obtainable from this large volume system.

Consists of:

2 1241 Oxygen Bomb Calorimeters
1 1730 Calorimeter Controller
1 1732 Dual Channel Kit
2 1108 Oxygen Bombs, extra
2 A391DD Calorimeter Buckets, extra
1 1541 Water Heater
1 1551 Water Cooler
1 1562 Closed System Bucket Filler
1 1841 Autocharger
1 1249 Spare Parts Kit

PROVIDES

- Two complete oxygen bomb calorimeters
- Automatic control of both calorimeters in four selectable modes, plus standardization and a manual option
- Precise electronic thermometry
- CRT display
- Complete menu driven operation
- Complete diagnostics
- 40 column thermal printer
- Large memory capacity
- Optional memory expansion
- Optional interface with a digital balance
- Optional communication with a central computer
- Two extra oxygen bombs and buckets
- Automatic bomb filling system
- Automatic bucket filler
- Closed circuit jacket temperature control

RECOMMENDED FOR

Coal mine, coal preparation plant, commercial inspection laboratories, coal burning utilities and other industrial laboratories where large test loads must be handled daily.

ORDERING INFORMATION

When ordering, specify:

1254 Oxygen Bomb Calorimeter System 4

All components in System 4 normally operate from a 115v60Hz line, but they can also be furnished for 115v50Hz or 230v50Hz.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DER
FEB 26 1985
BAQM

FEB 21 1985

REF: 4APT-AM

Ms. Victoria J. Tschinkel
Secretary, Florida Department
of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Ms. Tschinkel:

This is to acknowledge receipt of a copy of your letter dated January 22, 1985, to Mr. Tom V. Brown of the Container Corporation of America granting an increase in the annual operating hours from 8400 to 8760 in state permit AC 45-35532 - Power Boiler #7. We have reviewed the federal final determination and PSD permit, and agree with the request to increase the operating hours. The request for increase is consistent with the federal PSD permit since the final determination was based on 8760 operating hours.

Sincerely yours,

James T. Wilburn, Chief
Air Management Branch
Air, Pesticides, & Toxics Management Division

Cindy Sawyer - CCA
John C. Brown, Jr. - NE District } 3/1/85 PAR

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO.

ACTION DUE DATE

TO: (NAME, OFFICE, LOCATION)	
1. ~~Claire~~ Fancy	INITIAL / DATE
2. Bruce 3/1	INITIAL / DATE
3.	INITIAL / DATE
4.	INITIAL / DATE

REMARKS:

~~Fyi~~ Send copy to Container district & local (if there is one). Clair

done 3/1/85 BB

This needs to go in federal PSD file.

INFORMATION
- REVIEW & RETURN
- REVIEW & FILE
- INITIAL & FORWARD

DISPOSITION
- REVIEW & RESPOND
- PREPARE RESPONSE
- FOR MY SIGNATURE
- FOR YOUR SIGNATURE
- LET'S DISCUSS
- SET UP MEETING
- INVESTIGATE & REPT.
- INITIAL & FORWARD
- DISTRIBUTE
- CONCURRENCE
- FOR PROCESSING
- INITIAL & RETURN

FROM: Judy Rogers

DATE 2/27/85

PHONE

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee

To: _____ Loctn.: _____
To: _____ Loctn.: _____
To: _____ Loctn.: _____
From: _____ Date: _____

Reply Optional [ ] Reply Required [ ] Info. Only [ ]
Date Due: _____ Date Due: _____

TO: Victoria J. Tschinkel

FROM: C.H. Fancy, Deputy Chief, BAQM

DATE: January 22, 1985

SUBJ: Approval and signature of an amendment to the construction permit, NO. AC 45-35532, for Container Corporation of America, issued March 12, 1981 and amended December 7, 1984.

Enclosed is an amendment to the referenced construction permit and the bureau recommends approval.

CHF/BM/rw

Enclosure

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

January 22, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom V. Brown
Vice President and Resident Manager
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

Dear Mr. Brown:

RE: Request to Increase the Annual Hours of Operation to 8,760: AC 45-35532 - Power Boiler #7

The department is in receipt of Ms. Cynthia L. Sawyer's letter, dated December 27, 1984, which requested an increase in the annual hours of operation from the permitted 8,400 to 8,760. She contends that the increase would be consistent with the Region IV EPA's Final Determination: PSD-FL-062.

The bureau has reviewed both the federal and state final determinations and finds that the permitted pollutant emission rates and the hourly pollutant emission limits are the same. Also, the federal PSD review and final determination was based on 8,760 hours annual operation. The increase in the annual hours of operation from 8,400 to 8,760 in the above referenced state permit will be consistent with the federal permit PSD-FL-062. The bureau agrees with the request and the following shall be changed and added:

Specific Condition:

No. 10.

From: The maximum hours of operation shall be 8,400 hours per year.

To: The maximum hours of operation shall be 8,760 hours per year.

Attachment to be incorporated:

6. Cynthia L. Sawyer's letter, dated December 27, 1984.

This letter must be attached to your construction permit, AC 45-35532, and shall become a part of that permit.

Sincerely,

for Victoria J. Tschinkel

VJT/rw

enclosures

cc: James T. Wilburn
John C. Brown
Cynthia L. Sawyer

ATTACHMENT 6

Container Corporation of America

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

December 27, 1984

DER

DEC 28 1984

BAQM

Mr. C. H. Fancy, P. E.
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Dear Mr. Fancy:

As discussed with Bruce Mitchell on December 21, 1984, the operating permit for #7 Power Boiler, issued by the Northeast District, limits the operating hours to 8400 per year. We had requested 8760 hours per year, which is consistent with the hours used in EPA's Final Determination. EPA determined all requirements of the PSD regulations were met operating 8760 hours per year. The district office could not grant 8760 hours of operation a year because the DER construction permit (AC 45-35532) only allowed a maximum of 8400 hours per year. In order to change this specific condition in the operating permit, we must request a modification to Specific Condition No. 10 of the construction permit No. AC 45-35532. Therefore, we request that Specific Condition No. 10 of the construction permit be modified to read as follows:

"The maximum hours of operation shall be 8760 hours per year."

We would appreciate a timely response on this matter. If you have any additional questions or comments, please do not hesitate to call.

Sincerely,

Cynthia L. Sawyer

Cynthia L. Sawyer
Environmental Group Leader

CLS/ma

cc: John Brown - DER, Northeast District

No. 0155805

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

SENT TO Mr. Tom V. Brown			
STREET AND NO.			
P.O., STATE AND ZIP CODE			
POSTAGE			$
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE		¢
	OPTIONAL SERVICES	SPECIAL DELIVERY	¢
		RESTRICTED DELIVERY	¢
		RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED	¢
		RETURN RECEIPT SERVICE — SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
		RETURN RECEIPT SERVICE — SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES			$
POSTMARK OR DATE 1/22/85			

PS Form 3800, Apr. 1976

PS Form 3811, Apr. 1976

FERNANDINA BEACH JAN 24 1985 FLORIDA

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
   - ☒ Show to whom and date delivered..... ¢
   - ☐ Show to whom, date and address of delivery.... ¢
   - ☐ RESTRICTED DELIVERY
     Show to whom and date delivered..... ¢
   - ☐ RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Tom V. Brown
CCA, North Eighth St.
Fernandina Beach, FL 32034

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0155805	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Authorized agent

L. [illegible]

4. DATE OF DELIVERY 1-25-85 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-459

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT
3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

G. DOUG DUTTON
DISTRICT MANAGER

December 14, 1984

Mr. Paul J. Magnell
Vice President and Resident Manager
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

DER
DEC 17 1984
BAQM

Dear Mr. Magnell:

Nassau County - AP
Container Corporation of America
No. 7 Power Boiler

EPA Specific Condition 7, Final Determination, PSD-FL-062 requires a continuous monitor for SO_2 emissions. It is noted that a request for an alternate procedure for compliance monitoring of SO_2 was submitted to EPA on October 15, 1984.

No action on that request has been received by this office. Therefore, when Permit No. AO45-71885 was issued, the Department had no alternative except to require the CEMS until the alternate procedure has been approved.

Please advise of the action taken within 14 days of receipt of this letter. Technically, you are not in compliance with EPA Condition #7 and DER Condition #4. If you can facilitate early action on your request of October 15, 1984, it may preclude the necessity for a CEMS.

If there are any questions, please contact me.

Sincerely,

John Brown

John Brown, P.E.
Supervisor Air Section

JB:vk

cc: Mr. James T. Wilburn, EPA
Mr. Bruce Mitchell, BAQM
Ms. Cynthia Sawyer, CCA

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

Routing To District Offices
And/Or To Other Than The Addressee

To: _____ Loctn.: _____
To: _____ Loctn.: _____
To: _____ Loctn.: _____
From: _____ Date: _____

Reply Optional [ ] Reply Required [ ] Info. Only [ ]
Date Due: _____ Date Due: _____

TO: Victoria J. Tschinkel

FROM: C.H. Fancy, Deputy Chief, BAQM

DATE: December 7, 1984

SUBJECT: Approval and signature of an amendment to the construction permit, No. AC 45-35532, for Container Corporation of America, issued March 12, 1981.

Enclosed is an amendment to the referenced construction permit and the bureau recommends approval.

CHF/BM/rw

enclosure

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

December 7, 1984

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom V. Brown
Vice President and Resident Manager
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

Dear Mr. Brown:

RE: Amendment to Construction Permit: AC 45-35532

The Department is in receipt of Mr. David R. James' letter, dated August 21, 1984, which requested a ruling on the application of Specific Condition No. 3, as contained in the above referenced permit. The emission standard that would be applicable, in reviewing the CEM (continuous emission monitor) requirement pursuant to 40 CFR 60.45(a) and (b), Subpart D, is 40 CFR 60.44 (a)(3). In order to clarify the Specific Condition, the following shall be changed and added:

Specific Condition No. 3:

From: Based on the New Source Performance Standard, 40 CFR 60.45(a) and (b), as reference by 17-2.21(2)(a), the applicant shall install, calibrate, maintain, and operate continuous monitoring systems for measuring the opacity of emissions, nitrogen oxides emissions, and either oxygen or carbon dioxide, except as provided in 40 CFR 60.45(b).

To: Based on the New Source Performance Standard, 40 CFR 60.45(a) and (b), as referenced by 17-2.21(2)(a), the applicant shall install, calibrate, maintain, and operate continuous monitoring systems for measuring the opacity of emissions, nitrogen oxides emissions, and

either oxygen or carbon dioxide, except as provided in 40 CFR 60.45(b). Based on the fuel being combusted, the emission standard for nitrogen oxides to be used in applying 40 CFR 60.45(a) and (b) shall be in accordance with 40 CFR 60.44(a)(3), which allows a maximum of 300 nanograms per joule heat input (0.70 lb per million Btu) derived from solid fossil fuel or solid fossil fuel and wood residue (except lignite or a solid fossil fuel containing 25 percent, by weight, or more of coal refuse). A change in fuel will require a review of the applicable standard in 40 CFR 60.44.

Attachments to be incorporated:

4. David R. James' letter, dated August 21, 1984.
5. John C. Brown's memo, dated August 27, 1984.

This letter must be attached to your construction permit, AC 45-35532, and shall become a part of that permit.

Sincerely,

Victoria J. Tschinkel
Secretary

VJT/rw

enclosures

cc: James T. Wilburn
John C. Brown
Cynthia L. Sawyer

ATTACHMENT 4

Container Corporation of America

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

BP4/

August 21, 1984

Mr. John C. Brown Jr., P.E.
Air Section Supervisor
FDER
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Dear Mr. Brown:

I have reviewed your August 14, 1984 letter in which you stated that we are to submit a written request for a ruling by the Department on whether .49 or .42 lb/MMBTU applies to the NO_x continuous monitoring requirement. This letter will serve as that request. I have also sited specific sections of 40 CFR, Part 60, Subpart D that substantiate our position that .49 lb/MMBTU is the appropriate value for our No. 7 Solid Fossil Fuel Boiler.

In accordance with section 60.45 (b)(3), Subpart D, we elected to delay the installation of a continuous NO_x monitor until after the initial performance tests under section 60.8 were completed. Section 60.45 (b)(3) also states that if the owner or operator demonstrates during the performance test that emissions of nitrogen oxides are less that 70 percent of the applicable standards in section 60.44, a continuous monitoring system for measuring nitrogen oxides emissions is not required. Section 60.44 (a)(3) lists .70 lb per million BTU as the applicable standard for solid fossil fuel boilers. Our performance test showed .43 lb per million BTU or 61 percent of the applicable standard sited above. Therefore, a continuous monitoring system for nitrogen oxides is not required.

Based on the above-referenced sections from New Source Performance Standards we anticipate a favorable ruling by the Department on this matter.

Sincerely,

CONTAINER CORPORATION OF AMERICA

David R. James

David R. James
Environmental Engineer

DRJ/jrb

NOTE: Department rules indicated 0.45 lb/MM BTU average
JRB

ATTACHMENT 5

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

NORTHEAST DISTRICT, JACKSONVILLE

9/11 Bruce — 9/12/84 Please investigate & draft reply. I am guilty of holding this one. Clair

TO: Clair Fancy, BAQM

FROM: JB John Brown

DATE: August 27, 1984

SUBJECT: Nassau County - AP
Container Corporation of America
#7 Power Boiler - Permit No. AC45-35532
Ruling on Permit Condition

Please review the attached request from Container to determine whether a continuous monitoring system (CEMS) for nitrogen oxides is required on #7 power boiler.

The construction permit was issued based on 0.60 lb/MMBTU allowable emissions for nitrogen oxices. This would suggest the requirement for a continuous monitoring system if more than 0.36 lb/MMBTU nitrogen oxides were observed during performance tests (60.45 (b)(3), Subpart D, CFR). 0.45 lb/MMBTU were observed during performance testing.

The applicant suggests that the applicable standard in 60.44, Subpart D is 0.70 lb/MMBTU and therefore continuous monitoring is required only if 0.49 lb/MMBTU nitrogen oxides were observed during performance testing.

Please note that the applicant is not contesting the 0.60 lb/MTU NO_X allowable emissions, but feels that the CEMS should be based on paragraph 60.44(a)(3), Subpart D.

JB:vk

Best Available Copy

Container Corporation of America

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

BPW

August 21, 1984

Mr. John C. Brown Jr., P.E.
Air Section Supervisor
FDER
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Dear Mr. Brown:

I have reviewed your August 14, 1984 letter in which you stated that we are to submit a written request for a ruling by the Department on whether .49 or .42 lb/MMBTU applies to the NO_x continuous monitoring requirement. This letter will serve as that request. I have also sited specific sections of 40 CFR, Part 60, Subpart D that substantiate our position that .49 lb/MMBTU is the appropriate value for our No. 7 Solid Fossil Fuel Boiler.

In accordance with section 60.45 (b)(3), Subpart D, we elected to delay the installation of a continuous NO_x monitor until after the initial performance tests under section 60.8 were completed. Section 60.45 (b)(3) also states that if the owner or operator demonstrates during the performance test that emissions of nitrogen oxides are less that 70 percent of the applicable standards in section 60.44, a continuous monitoring system for measuring nitrogen oxides emissions is not required. Section 60.44 (a)(3) lists .70 lb per million BTU as the applicable standard for solid fossil fuel boilers. Our performance test showed .43 lb per million BTU or 61 percent of the applicable standard sited above. Therefore, a continuous monitoring system for nitrogen oxides is not required.

Based on the above-referenced sections from New Source Performance Standards we anticipate a favorable ruling by the Department on this matter.

Sincerely,

CONTAINER CORPORATION OF AMERICA

David R. James

David R. James
Environmental Engineer

DRJ/jrb

NOTE: Department review indicated 0.45 lb/MM Btu average
JB

P167682466

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO
Tom V. Brown
STREET AND NO.
North Eighth Street
P.O., STATE AND ZIP CODE
Fernandina Beach, FL 32034

POSTAGE	$
CERTIFIED FEE	¢
SPECIAL DELIVERY	¢
RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED	¢
RETURN RECEIPT SERVICE — SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE — SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES	$
POSTMARK OR DATE	

CONSULT POSTMASTER FOR FEES
OPTIONAL SERVICES

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1978

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- [X] Show to whom and date delivered..... ¢
- [ ] Show to whom, date and address of delivery.... ¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered..... ¢
- [ ] RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Tom V. Brown
North Eighth Street
Fernandina Beach, FL 32034

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
P16	7682466	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [X] Authorized agent

4. DATE OF DELIVERY: 12/18/84
POSTMARK: NASSAU GREEN CO. FLA. DEC 17 AM 1984

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:
CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-459

Retracted 12/4/84 via phone call with Cynthia Sawyer. BOC

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

NOT VALID

October 22, 1984

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom V. Brown
Vice President and Resident Manager
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

Dear Mr. Brown:

Re: Amendment to the Construction Permit: AC 45-35532

The Department is in receipt of Ms. Cynthia L. Sawyer's letter dated August 21, 1984, which contained information to support a revision of the original BACT determined NO_x emission limit contained in the above referenced construction permit. Since an amendment revising the original BACT determined NO_x emission limit was signed October 12, 1984, the Department shall make the following changes and additions:

Specific Conditions:

No: 9

From: Maximum emission limits are:

Pollutant	lb/MMBTU	lb/hr
Particulate	0.1	102
SO_2	1.2	1,225
NO_x	0.6	612
Opacity	20% except 27% for one 6 minute period per hour.	

To: Maximum emission limits are:

Pollutant	lb/MMBTU	lb/hr
Particulate	0.1	102
SO_2	1.2	1,225
NO_x	0.7	700
Opacity	20% except 27% for one 6 minute period per hour.	

NOT VALID

No. 13: (new Specific Condition)

Permitted fuels shall be in accordance with 40 CFR 60.44(a)(3).

Attachments to be incorporated:

4. Cynthia L. Sawyer's letter dated August 21, 1984.
5. John C. Brown's memo dated August 27, 1984.
6. Cynthia L. Sawyer's letter dated September 13, 1984.
7. John C. Brown's letter dated September 14, 1984.
8. Amended BACT Determination dated October 12, 1984.

This letter must be attached to your construction permit, No. AC 45-35532, and shall become a part of that permit.

Sincerely,

Victoria J. Tschinkel

Victoria J. Tschinkel
Secretary

VJT/ks

cc: James T. Wilburn
Doug Dutton
John C. Brown
Cynthia L. Sawyer
Nancy Wright

enclosures

Container Corporation of America

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

BPW

August 21, 1984

Mr. John C. Brown Jr., P.E.
Air Section Supervisor
FDER
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Dear Mr. Brown:

I have reviewed your August 14, 1984 letter in which you stated that we are to submit a written request for a ruling by the Department on whether .49 or .42 lb/MMBTU applies to the NO_x continuous monitoring requirement. This letter will serve as that request. I have also sited specific sections of 40 CFR, Part 60, Subpart D that substantiate our position that .49 lb/MMBTU is the appropriate value for our No. 7 Solid Fossil Fuel Boiler.

In accordance with section 60.45 (b)(3), Subpart D, we elected to delay the installation of a continuous NO_x monitor until after the initial performance tests under section 60.8 were completed. Section 60.45 (b)(3) also states that if the owner or operator demonstrates during the performance test that emissions of nitrogen oxides are less that 70 percent of the applicable standards in section 60.44, a continuous monitoring system for measuring nitrogen oxides emissions is not required. Section 60.44 (a)(3) lists .70 lb per million BTU as the applicable standard for solid fossil fuel boilers. Our performance test showed .43 lb per million BTU or 61 percent of the applicable standard sited above. Therefore, a continuous monitoring system for nitrogen oxides is not required.

Based on the above-referenced sections from New Source Performance Standards we anticipate a favorable ruling by the Department on this matter.

Sincerely,

CONTAINER CORPORATION OF AMERICA

David R. James

David R. James
Environmental Engineer

DRJ/jrb

NOTE: Department review indicated 0.45 lb/MM Btu average

JRB

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

NORTHEAST DISTRICT, JACKSONVILLE

9/11 Bruce — 9/12/84
Please investigate & draft reply. I am guilty of holding this one.
Clair

TO: Clair Fancy, BAQM

FROM: JB John Brown

DATE: August 27, 1984

SUBJECT: Nassau County - AP
Container Corporation of America
#7 Power Boiler - Permit No. AC45-35532
Ruling on Permit Condition

Please review the attached request from Container to determine whether a continuous monitoring system (CEMS) for nitrogen oxides is required on #7 power boiler.

The construction permit was issued based on 0.60 lb/MMBTU allowable emissions for nitrogen oxices. This would suggest the requirement for a continuous monitoring system if more than 0.36 lb/MMBTU nitrogen oxides were observed during performance tests (60.45 (b)(3), Subpart D, CFR). 0.45 lb/MMBTU were observed during performance testing.

The applicant suggests that the applicable standard in 60.44, Subpart D is 0.70 lb/MMBTU and therefore continuous monitoring is required only if 0.49 lb/MMBTU nitrogen oxides were observed during performance testing.

Please note that the applicant is not contesting the 0.60 lb/MTU NO_X allowable emissions, but feels that the CEMS should be based on paragraph 60.44(a)(3), Subpart D.

JB:vk

File: AC 45-35532

Container Corporation of America

Paper Mill Division

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-5551

September 13, 1984

Mr. Bruce Mitchell
DER - Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Dear Mr. Mitchell:

As discussed in our phone conversation this morning, this letter is written verification that we do not plan to burn lignite or 25% by weight of coal refuse in No. 7 Coal Fired Power Boiler. No. 7 Power Boiler only burns washed bituminous coal. My understanding from our conversation is this verification will allow the NO_x limit to be changed from .6 lb/mmBTU to .7 lb/mmBTU, because the .6 lb/mmBTU only applies to boilers burning lignite or coal refuse [as stated in 40 CFR 60.44(a)(4)] and will also add a specific condition stating we cannot burn lignite or coal refuse.

If you have any additional questions or comments, please do not hesitate to call.

Sincerely yours,

CONTAINER CORPORATION OF AMERICA

Cynthia L. Sawyer

Cynthia L. Sawyer
Environmental Group Leader

jrb

DER

SEP 21 1984

BAQM

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT
3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

G. DOUG DUTTON
DISTRICT MANAGER

September 14, 1984

Ms. Cynthia Sawyer
Environmental Group Leader
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

Dear Ms. Sawyer:

Nassau County - AP
Container Corporation of America
No. 7 Power Boiler
Nitrogen Oxides and SO_2 Monitoring Requirement

The following information is provided to document the conversations with Mr. Bruce Mitchell and me on September 13, 1984.

Mr. Mitchell has indicated that he is willing to modify the construction permit for No. 7 power boiler to require an emissions limiting standard of 0.70 $lb/10^6$ BTU per CFR 40, Section 60.44(a)(3) subject to the following:

1. Certification that you have not used, are not using, and will not utilize lignite or a solid fossil fuel containing 25 percent by weight, or more of coal refuse.

2. That the permit condition be changed to limit future use of No. 7 power boiler to the fuel input specified by 40 CFR, Section 60.44(a)(3).

Please note that we have not received the additional information required for completion of the operating permit review for No. 7 power boiler. Also, please expedite the request for approval of your alternate method for monitoring sulfur dioxide.

Failure to complete the action required to obtain the operating permit for No. 7 power boiler most expeditiously will necessitate enforcement action by the Department.

Please send me copies of all letters to the Bureau of Air Quality Management and EPA.

Your cooperation is appreciated.

Sincerely,

John C Brown Jr

John Brown, P.E.
Supervisor Air Section

JB:vk

cc: Bruce Mitchell
Enforcement

NOT VALID

Best Available Control Technology (BACT) Determination
Container Corporation of America
Nassau County
Amendment

This amended BACT determination revises only the NO_x emission limit contained in the BACT determination dated December 30, 1980.

The affected source is a 1000 million Btu per hour heat input coal/wood waste fired steam generator (power boiler No. 7) installed at the applicant's plant site located on the inland side of Amelia Island.

BACT Determination Requested by the Applicant:

Pollutant	Emission Limit
Nitrogen Oxides	0.7 lb/million Btu heat input

Date of Receipt of a Complete BACT Application:

December 12, 1980

Date of Publication in the Florida Administrative Weekly:

December 19, 1980

Review Group Members:

The revised determination was based upon comments received from the New Source Review Section and the Northeast District.

BACT Determination by DER:

Pollutants	Emission Limit
Nitrogen Oxides (NO_x)	0.7 lb/million Btu heat input based on the gross calorific value of the fuel combusted.

Compliance with the nitrogen oxide emission limitation will be in accordance with the applicable test methods and procedures as set forth in Subsection 60.46, New Source Performance Standards (NSPS), Subpart D.

BACT Determination Rationale:

The December 30, 1980 BACT determination was based on the NSPS, 40 CFR 60.40, Subpart D. Rationale for the NO_x standard was based on Subsection 60.44(a)(4) of the NSPS, or 0.60 lb NO_x per million Btu derived from lignite or lignite and wood residue.

The applicant has submitted a letter indicating that no lignite will be fired in power boiler No. 7, only coal and wood residue. The applicant, therefore, requests that the NSPS, Subsection 60.44(a)(3), be the limiting standard for NO_x emissions, that is 0.70 lb NO_x per million Btu heat input derived from solid fossil fuel or solid fossil fuel and wood residue (except lignite or a solid fossil fuel containing 25%, by weight, or more of coal refuse).

The New Source Performance Standards, Subpart D, Subsection 60.45(b)(3) states: that if the owner or operator demonstrates during the performance test that emissions of nitrogen oxides are less than 70 percent of the applicable standard in Subsection 60.44, continuous NO_x monitoring is not required. The performance test for power boiler No. 7 was 0.43 lb NO_x per million Btu or 61.4 percent based on the 0.7 standard and 71.6 percent based on the 0.6 standard. No continuous NO_x monitoring will be required if the emission limit is changed as requested. The actual NO_x emitted will be unaffected.

The Department agrees with the applicants request and has revised the NO_x emission limit as per specific condition 9 of their construction permit, No. AC 45-35532. All other air pollutant emission limits, based upon the December 30, 1980 BACT determination, are not to be changed.

Air quality modeling predicts no violation of any PSD increment or ambient air quality standard resulting from the revised NO_x emission limit.

Details of the Analysis may be Obtained by Contacting:

Edward Palagyi, BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Recommended By:

C. H. Fancy, Deputy Bureau Chief

Date: 10/11/84

Approved By:

Victoria J. Tschinkel, Secretary

Date: 10/12/84

EFP/agh

P 408 530 306

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. Tom V. Brown	
Street and No.	
P.O., State and ZIP Code	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date 10/26/84	

PS Form 3800, Feb. 1982

PS Form 3811, Jan. 1979

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
   - ☒ Show to whom and date delivered..... ¢
   - ☐ Show to whom, date and address of delivery.... ¢
   - ☐ RESTRICTED DELIVERY
     Show to whom and date delivered..... ¢
   - ☐ RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Tom V. Brown
CCA, North Eighth Street
Fernandina Beach, FL 32034

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	P408530306	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY 10/29/84

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK: FERNANDINA BEACH, FL OCT 29 AM 1984 32034

CLERK'S INITIALS

☆GPO : 1979-300-429

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

October 15, 1984

Mr. James T. Wilburn, Chief
Air Management Branch
USEPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Wilburn:

Re: Request for Alternate Procedure for Compliance Monitoring of SO_2 for Power Boiler No. 7: Container Corporation of America

The Florida Department of Environmental Regulation has received a request from the above referenced source for an alternate procedure for compliance monitoring of SO_2 for an NSPS source. Would you please have someone in your staff review and comment on the enclosed proposal and advise us as soon as possible.

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.
Deputy Chief
Bureau of Air Quality
Management

CHF/BM/s

cc: John C. Brown, Jr.

enclosure

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

CENTRAL AIR PERMITTING

ACTION NO.

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)	INITIAL / DATE
ADAMS AMODIO FANCY GEORGE	
2. HANKS HERON HOLLADAY KING	INITIAL / DATE
3. MITCHELL, Becky MITCHELL, Bruce	INITIAL / DATE
4. PALAGYI POWELL ROGERS SVEC THOMAS	INITIAL / DATE

REMARKS:

What do you think of their proposal as it relates to permit conditions?

Since the boiler was originally permitted in accordance with Subpart D, I see no objection on either state or Fed permits if the sampling plan is in full accordance with the amendments and if the amendments are promulgated as proposed.

CJ

INFORMATION
- REVIEW & RETURN
- REVIEW & FILE
- INITIAL & FORWARD

DISPOSITION
- REVIEW & RESPOND
- PREPARE RESPONSE
- FOR MY SIGNATURE
- FOR YOUR SIGNATURE
- LET'S DISCUSS
- SET UP MEETING
- INVESTIGATE & REPT
- INITIAL & FORWARD
- DISTRIBUTE
- CONCURRENCE
- FOR PROCESSING
- INITIAL & RETURN

FROM: Clair

DATE 10/10

Container Corporation of America

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

October 5, 1984

Mr. Bill Vogel
Air and Waste Management Division
EPA
345 Courtland Street
Atlanta, Georgia

Dear Mr. Vogel:

Enclosed is a copy of CCA's procedures for compliance monitoring of SO_2 by sampling and testing of coal. The Northeast subdistrict suggested we send your office a copy of these procedures for your office to approve as an alternative method for determining compliance with the SO_2 limit. We have reviewed our procedures with the Florida DER subdistrict and they approve of our SO_2 sampling and testing methods. They are awaiting your decision on this matter so an operating permit can be issued. Your prompt reply will be appreciated.

If you have any additional questions, please do not hesitate to be in contact with me.

Sincerely,

CONTAINER CORPORATION OF AMERICA

David R. James

for: Cynthia L. Sawyer
Environmental Group Leader

Enclosure

jrb

cc: C. H. Fancy, BAQM
John C. Brown, Jr, Northeast District

Container Corporation of America

Paper Mill Division

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-5551

CONTAINER CORPORATION OF AMERICA

COAL SAMPLING AND TESTING PROCEDURES

FOR COMPLIANCE MONITORING OF SO_2

FOR #7 POWER BOILER

INTRODUCTION

INTRODUCTION TO COAL TESTING

Coal Testing at Container Corporation of America's Fernandina Beach Mill demonstrates compliance with the 1.2 lbs SO_2/mmBTU on a 30-day rolling average. Container has contracts with two coal companies that supply approximately 5,000 tons of coal per week to the CCA's Fernandina Beach facility. In CCA's construction permit for this NSPS source, the amount of sulfur allowed in the coal is calculated as follows:

$$\text{ALLOWABLE \% SULFUR} = 6.32 \times 10^{-5} \times (\text{BTU per lb coal})$$

The coal which is purchased is low surfur coal with high BTU values. The coal purchasing contract states that the coal cannct exceed 1.2 lb SC_2/mmBTU. The buyer will reject the coal if it does not meet the requirements in the contract for SO_2. CCA felt as though it would be best to have the coal analyzed prior to receiving the shipment at the mill. Therefore, the coal is analyzed by each coal mine and it is also analyzed by a commercial laboratory. If there is a discrepency in the analyses, both the mine and the lab run their test again. The sample is also sent to an independent lab to verify which analysis is correct.

Since the boiler came on line, CCA has been following this procedure for SO_2 compliance monitoring. During the past year and a half, no sample has gone over the 1.2 lbs SO_2/mmBTU limit. This procedures handbook is to identify our coal sampling and testing procedures which document compliance with the 1.2 lbs SO_2/mmBTU allowable.

SAMPLING POINT SELECTION

SAMPLING POINT LOCATION

We elected to have the coal sampled and analyzed at each respective mine site prior to shipments. These analyses are received at our mill before the coal shipments arrive, affording us the opportunity to reject shipments not meeting contract and/or compliance conditions.

If sampling were performed at the mill and the analysis showed non-compliance with SO_2, it would be very difficult to distinguish and/or remove the non-compliance coal from the storage system.

In conjunction with the analyses conducted at the mine sites, duplicate coal samples are sent to an independent laboratory (Commercial Testing, Charleston, WV) for verification of the mines' results. To date, comparison of analyses has been excellent.

SAMPLING METHODS

SAMPLING METHODS

Not only is the sampling location important but also the method by which the coal is sampled. The sample collection is accomplished at the coal mines by different sampling methods. The Golden Oaks Mine uses a J. A. Redding automatic coal sampling system (schematic attached). This is a two stage continuous sampler. Coal shipments to CCA from Golden Oaks consist of approximately 20 to 25 railcars per lot. This sampler has a primary cutter which randomly cuts the full stream of the coal being loaded. During the entire loading about 7,500 lbs. go to the secondary system where it is crushed to a 8 mesh and split into a 50 lb. sample. This sample is then put through a riffler which splits the sample down to the 5 lb. increment that is sent to Commercial Testing for duplicate analysis.

The Peabody Mines (Stickney and Robin Hood, WV) use a semi-mechanical system. The loading operator stops the conveyor belt and takes a straight cut of approximately 50 lbs. across the belt. This is done four times per railcar. The lot size is approximately 16 to 20 railcars. There are approximately 64 to 80 incremental samples per lot. The sample is then crushed to 8 mesh and further divided by a riffler. The sample is split until a 5 to 10 lb. sample is obtained. This sample is also sent to Commercial Testing and to Peabody's in-house laboratory. Both of these coal mines sampling procedures meet ASTM method 2234 for sample size and number of increments.

PURCHASE CONTRACT

COAL SPECIFICATIONS

TABLE 2

PURCHASE CONTRACT
COAL SPECIFICATIONS

Washed coal crushed to size of 2" x 0"

BTU/lb	12,500 minimum
Moisture, as received	8% maximum
Ash, as received	11% maximum
Volatile	30% minimum
Sulfur	1.2 lbs SO_2/mmBTU maximum

Coal not meeting specifications for SO_2 will be rejected.

TEST METHODS

TEST METHODS

	ASTM METHOD				
	Sample Collection	Sample Preparation	Sulfur	Moisture	GCV
Method 19	D2234	D2013	D3177	D3173	D3176*
Golden Oaks	D2234	D2013	Leco Sulfur Analyzer	D3302	D3286
Peabody	D2234	D2013	D3177	D3302	D3286
Commercial Testing	---	D2013	D3177	D3302 D3173	D3286

* This is the ASTM method for an Ultimate Analysis which does not include GCV. ASTM D 3286 is the method to determine GCV.

The Peabody mine participates in a round robin program where they receive an unknown sample once a month for analysis. Peabody also checks their analysis using standard samples on a more frequent basis.

Commercial Testing and Engineering in Charleston, WV serves as the independent laboratory. A copy of their standard laboratory procedure is enclosed. Following is a comparison of results based on sulfur analyses by the mines and Commercial Testing. These are monthly averages and show very little difference between analysts. All the records on compliance monitoring of SO_2 are maintained by the mill Environmental Group.

CCA NO. 7 POWER BOILER

Emissions lb SO_2 mm BTU as determined by Sulfur Analysis of the coal. Mining Company vs Commercial Testing.

	Mining Company	
1984	Golden Oaks	Commercial Testing
January	0.96	1.02
February	0.94	1.02
March	0.97	1.05
April	0.96	1.01
May	1.02	1.05
June	0.99	1.05

1984	Peabody	Commercial Testing
January	0.97	1.05
February	0.96	1.08
March	1.10	1.14
April	1.05	1.06
May	1.07	1.07
June	1.05	1.06

COMMERCIAL TESTING & ENGINEERING CO.
GENERAL OFFICES: 228 NORTH LA SALLE STREET, CHICAGO, ILLINOIS 60601 · AREA CODE 312 726-8434

WEST VIRGINIA DIVISION MANAGER
TOM BRAZEAU

SINCE 1908

PLEASE ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 808, CHARLESTON, WV 25323
OFFICE TEL. (304) 925-6631

February 23, 1984

Cindy Sawyer
Container Corp. of America
Mill Div., North 8th Street
Fernandina Beach, Florida 32034

Dear Cindy,

Commercial Testing & Engineering Co. in Charleston receives 1000-2000 grams of 8 Mesh coal samples directly from two suppliers that is to be shipped to Container Corp. of America.

The coal sample is identified by railcar no's. and airdried in accordance with ASTM D3302 sec. 3.2.2, 3.2.3 and 3.3 at 10°C above ambient temperature until the moisture loss is less than 0.1% per hour. The sample is then riffled to 1000 grams and pulverized to -60Mesh. This sample is subdivided to between 75 and 100 grams and thoroughly mixed in a sample shaker.

This sample is then sent to the laboratory where the following test are performed. Residual Moisture ASTM D3173-79 Ash ASTM D3174-82, Volatile Matter ASTM D-3175 sec. 6.1, Gross Calorific Value ASTM D3286-77 and Sulfur determination ASTM D3177-1982 sec. 3.3.

C.T.&E. adheres to ASTM procedures and has internal (daily) as well as external (weekly) quality control samples run under identical procedures for quality assurance.

If you have any other questions please feel free to contact me at your convenience.

Very truly yours,

COMMERCIAL TESTING & ENGINEERING CO.

Edwin B Snellings

Edwin B. Snellings, Manager
Charleston Office

EBS/tk

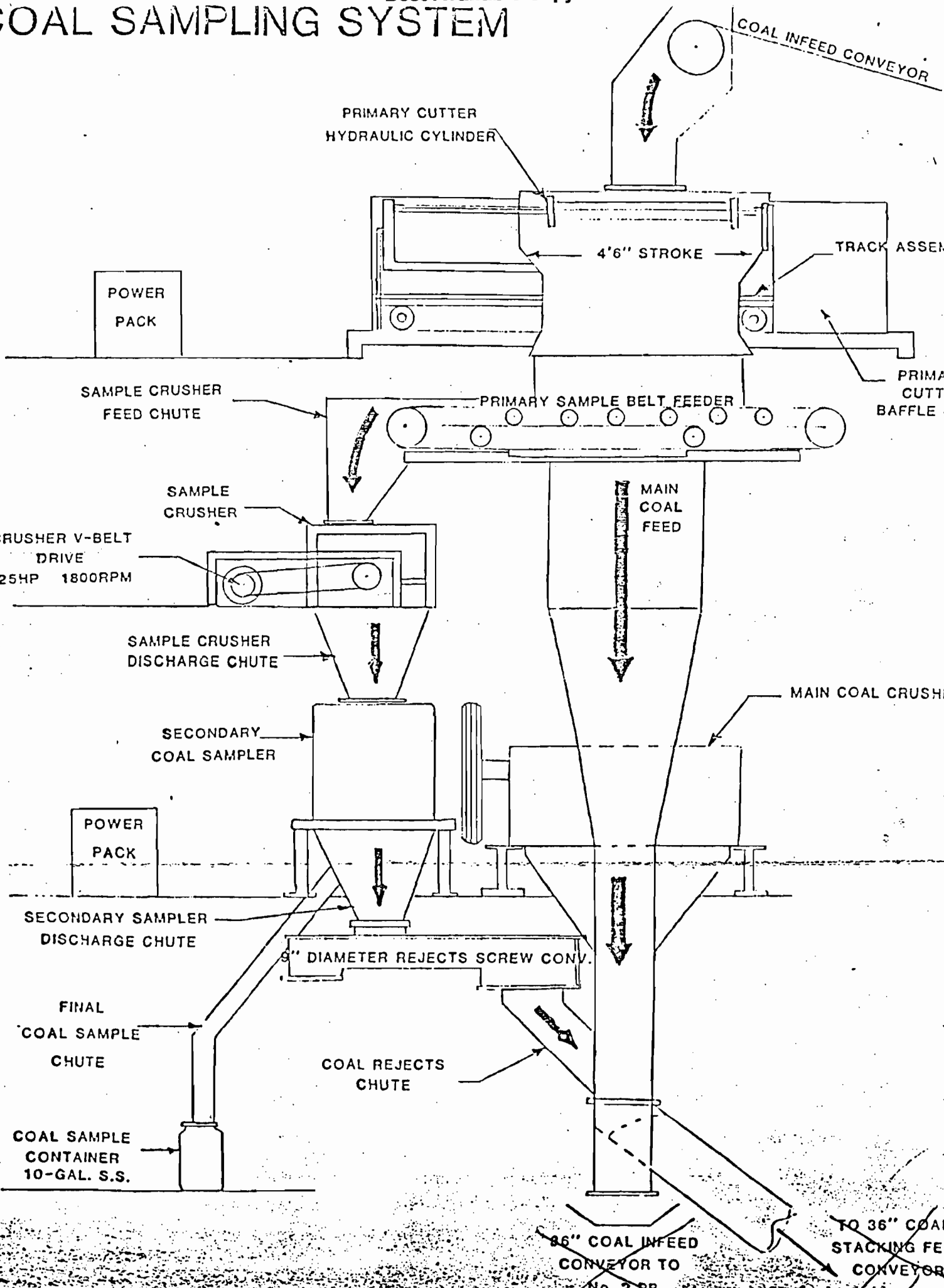
Charter Member

CONCLUSION

CONCLUSION

CCA feels the sampling method and analysis are sufficient to meet the fuel analysis specified by CFR 40 60.45(b)(2). In the Federal register dated Oct. 21,1983, Standards of Performance for New Stationary Sources, proposed revisions stated if the fuel is sampled, it must meet ASTM D-2234. As we stated ealier, these samplers do meet ASTM Method D-2234 and are also analyzed by ASTM methods. We believe this demonstrates compliance with CFR 40 60.45(b)(2).

COAL SAMPLING SYSTEM



ENVIRONMENTAL PROTECTION AGENCY - STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES - FOSSIL-FUEL-FIRED STEAM GENERATORS - DEADLINE FOR COMMENTS IS DECEMBER 20, 1983

According to the Federal Register of October 21, 1983:

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Part 60

[AD-FRL 2328-3]

Standards of Performance for New Stationary Sources; Fossil-Fuel-Fired Steam Generators

AGENCY: Environmental Protection Agency.

ACTION: Proposed revision of rule.

SUMMARY: On December 23, 1971, the Environmental Protection Agency promulgated standards of performance for large fossil-fuel-fired steam generating units constructed after August 17, 1971 (40 CFR Part 60, Subpart D). The changes to Subpart D being proposed today would establish sulfur dioxide compliance, emission monitoring, and reporting requirements on a 30-day rolling average basis. Electric utility steam generating units constructed after September 18, 1978, would not be affected by the proposal since they are subject to Subpart Da. For steam generators firing low-sulfur compliance fuels, the proposal would allow sulfur dioxide compliance testing by continuous emission monitoring, stack testing, or fuel sampling and analysis. For steam generators equipped with flue gas desulfurization systems, compliance testing could be conducted by either continuous emission monitoring or stack testing. The proposed revisions would become effective 1 year after promulgation. The proposal includes a new sulfur dioxide compliance test method (Reference Method 19A) which incorporates the revised test methods and data reduction procedures.

DATES: Comments on the proposed revisions are requested by December 20, 1983. The revision would become effective 1 year after promulgation.

ADDRESS: Comments should be submitted (in duplicate if possible) to: Central Docket Section (LE-131), U.S. Environmental Protection Agency, 401 M Street, SW., Washington, D.C. 20460. Attention: Docket No. A-81-15.

Docket. Docket No. A-81-15, containing supporting information used in developing the proposed revision, is available for public inspection and copying between 8:00 a.m. and 4:00 p.m., Monday through Friday, at EPA's Central Docket Section, West Tower Lobby, Gallery 1, Waterside Mall, 401 M Street, SW., Washington, D.C. 20460. A reasonable fee may be charged for copying.

FOR FURTHER INFORMATION CONTACT: Mr. Fred L. Porter, or Mr. Walter H. Stevenson, Standards Development Branch, Emission Standards and Engineering Division (MD-13), U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711, telephone number (919) 541-5624.

SUPPLEMENTARY INFORMATION:

Background

On December 23, 1971, EPA promulgated standards of performance for large fossil-fuel-fired steam generating units (36 FR 24876; 40 CFR Part 60, Subpart D). The standards limit emissions of sulfur dioxide (SO_2), particulate matter, and oxides of nitrogen. The SO_2 emission standard for coal is 520 ng/J (1.2 lb SO_2, per million Btu) heat input and for fuel oil is 340 ng/J (0.8 lb SO_2, per million Btu) heat input. The SO_2 standard can be met by the use of low-sulfur fuels, flue gas desulfurization (FGD), or a combination of the two.

When the SO_2 standards were promulgated in 1971, there were little data available on short-term variability of SO_2 emissions; it was expected that short-term stack tests would be satisfactory for assessing compliance with the SO_2 standard at facilities using either low-sulfur compliance fuel or FGD. Compliance demonstration was required through the use of EPA Reference Method 6 (minimum 3-hour test period).

Subpart D also required that continuous SO_2 emission monitors be installed and operated. For facilities using compliance fuel, continuous SO_2 monitors were not required, provided that fuel sampling and analysis were conducted. Continuous SO_2 emission monitoring systems has not been extensively evaluated by EPA in 1971 and, because of this, performance specifications (including data reduction and reporting requirements) were not included in the 1971 regulation. Therefore, the monitoring requirements proposed in August 1971 indicated that a review of continuous emission monitoring systems would be conducted and additional guidance provided at a later date (36 FR 15704).

The guidance on continuous monitoring systems was provided on October 6, 1975, when EPA promulgated a number of changes to Subpart D (proposal at 39 FR 32852 and promulgation at 40 FR 46250). Included were performance specifications for continuous emission monitoring systems and emission reporting requirements for FGD-equipped steam generators. For FGD-equipped units, the revision required that the data collected by the

SO_2 monitor be used to prepare quarterly reports of excess emissions. A 3-hour averaging period, consistent with the Method 6 stack test, was specified for data reduction purposes.

In the proposal to the 1975 changes, EPA had included SO_2 excess emissions reporting requirements for both FGD and non-FGD-equipped steam generators. However, comments received on the proposed monitoring requirements pointed to a number of problems with the proposed fuel analysis option and the impact of coal sulfur variability on reporting excess emissions. Comments and discussions with coal suppliers and electric utility companies led the Agency to conclude that the proposed requirements for fuel analysis were inadequate and inconsistent with the existing fuel supply situation. Recognizing that additional study would be necessary before meaningful provisions could be developed, the fuel analysis provisions of Subpart D were reserved in the regulation.

Since 1975, EPA has conducted a number of studies to assess both the sulfur variability in coal and the variation in FGD performance. Today's proposel is based on these studies and completes the SO_2 emission monitoring requirements for steam generators using compliance fuels and revises the provisions for FGD-equipped units.

Rationale for Proposal

When EPA proposed emission standards for large fossil-fuel-fired steam generating units in 1971, EPA indicated that the 520 ng/J (1.2 lb SO_2 per million Btu) emission limit for coal-fired units could be complied with by using either flue gas desulfurization or low-sulfur coal. In developing the standard, EPA reviewed U.S. coal reserve data to determine the potential impacts of the standard on compliance coal reserves. As indicated in the background document for the 1971 standard, a high grade coal with a sulfur content of 0.7 percent or less was judged capable of complying with the standard (II–A–001 p. 5). In selecting a 0.7 percent sulfur compliance coal as one basis of the standard, EPA estimated that about one-fourth of the U.S. recoverable coal reserves could be expected to comply (II–B–001). In arriving at this estimate, the Agency considered the average sulfur content of the fuel reserves but did not consider sulfur content variability or the effect of averaging time.

Many facilities subject to Subpart D have elected to use compliance fuel. A survey conducted by EPA in 1978 indicated that approximately 200 coal-fired electric utility boilers subject to Subpart D will have begun operation by 1983. Of these, approximately one-half plan to use compliance coal. The other half plan to use FGD systems (II–A–003).

The issue of averaging time for the SO_2 standard relates to both the variability of sulfur content of the coal and FGD performance. In relation to compliance coals, the variability of sulfur has been addressed in various EPA studies since 1975 and studies continue (II–A). From the studies completed to date, it is clear that coal is not homogeneous and the sulfur content of coal used in a steam generator can vary, even when the coal is supplied from the same mine. In addition to geological properties, some of the factors that affect coal sulfur content variability include mining practices, coal preparation procedures, on-site coal handling procedures (including the on-site mixing of coal from various suppliers), and chemical characteristics of the coal. These factors can interact and result in complex sulfur variability patterns which are difficult for boiler operators to predict or manage on a short-term basis.

The record shows that this variability and these effects were largely not recognized by EPA or by commenters when the standard was adopted in 1971. Because the sulfur content of coal supplied to a steam generator varies with time, the averaging time associated with an SO_2 emission limit can affect the supply of coals that can comply with the standard without the use of FGD. As the averaging period associated with an emission standard is shortened, coals with a lower mean sulfur content are required to assure compliance. Table 1 shows the estimated range of mean sulfru levels required to meet a 520 ng/J (1.2 lb per million Btu) heat input standard for different averaging times. Table 2 shows the estimated U.S. low-sulfur coel reserves that would be expected to comply with various mean sulfur levels listed in Table 1.

Combined, Tables 1 and 2 show that interpretation of the SO_2 standard on a short-term basis severely limits supplies of compliance coals. The tables show that about 10 percent, or less, of the U.S. coal reserves would be expected to comply with the SO_2 standard on a 3-hour basis. However, on a 30-day rolling average basis, about 25 percent of the coal reserves could comply with Subpart D and this is consistent with the intended effects when the standard was adopted in 1971.

Proposed Averaging Time and Monitoring Requirements

Based on these analyses (II–B–002), EPA believes that a 30-day period is an appropriate averaging period for evaluating compliance fuels and makes the standard conform to the original intent. The rolling average allows for daily enforcement. Averaging periods longer than 30 days were judged to be unnecessary. Longer averaging periods would have relatively little additional effect on mitigating the effect of coal sulfur variability compared to the 30-day rolling average. Shorter averaging periods would severely limit compliance coal supplies for plants subject to the standard and could lead to the use of costly coal blending facilities.

TABLE 1.—ESTIMATED MEAN SO_2 EMISSION LEVELS REQUIRED TO COMPLY WITH A 520 NG/J (1.2 LB/MILLION BTU) EMISSION LIMIT AT DIFFERENT AVERAGING BASES

Averaging periods (rolling average)	Required mean SO_2 Emissions[1]	
	ng/J	Lb SO_2/10^6 Btu
90-days	450	1.04
30-days	410	0.95
3-hour	255	0.59

SOURCE: Docket A-81-15, II-B-002.

[1] Based upon 24-hour relative standard deviation and autocorrelation values of 0.20 and 0.70, respectively.

TABLE 2.—ESTIMATED NATIONAL LOW-SULFUR COAL RESERVES[1]

Required mean SO_2 emission		Estimated recoverable U.S. coal reserves (percent)
ng/J	Lb SO_2/10^6 Btu	
260	0.6	5 to 7.
300	0.7	10 to 15.
345	0.8	15 to 20.
385	0.9	20 to 25.
430	1.0	25 to 30.
470	1.1	30 to 40.

SOURCE: Docket A-81-15, II-B-002.

[1] Based upon a ±20 percent accuracy level of estimated coal reserves.

In addition, EPA also proposes to apply the 30-day rolling average to FGD-equipped units. Similar to the short-term fluctuations in SO_2 emissions experienced when combusting compliance fuels, FGD performance and associated SO_2 emissions from FGD equipped units also experience short-term fluctuations. The short-term variation in FGD performance was not well understood when Subpart D was adopted in 1971 and is not appropriately addressed by a short-term 3-hour compliance test. Based on a thorough review of FGD performance data, which was conducted in conjunction with the revised NSPS for utility steam generating units (Subpart Da; 44 FR 33580), EPA has concluded that a 30-day rolling average best typifies the

performance of a well-designed and properly operated FGD system. At promulgation of Subpart Da, EPA concluded that a 30-day average allows adequate time for owners or operators to respond to operating problems affecting FGD efficiency, permits greater flexibility in procedures necessary to operate FGD systems in compliance with the standard, and can reduce the effects of coal sulfur variability on maintaining compliance (44 FR 33595). These same considerations are applicable to evaluating the performance of FGD-equipped units subject to Subpart D and a 30-day rolling average is included in this proposal.

The proposed revision would make Subpart D consistent with the intent and the anticipated effect at the time it was adopted and does not make it a more stringent regulation with which to comply. By determining compliance through continuous methods, it will better ensure that sources continuously comply with the standard. Finally, the proposal provides an averaging time that is consistent with the capability of the control technology. If adopted, the revisions would become effective 1 year after promulgation. This lag time provides the necessary time for planning, procurement, installation, and start-up of monitoring systems and data processing equipment which will be required.

A number of factors contribute to the need for allowing a 1-year period to implement the revisions. Sources that now have continuous emission monitors for determining excess SO_2 emissions would have to develop data retrieval and reduction capabilities for determining the 30-day rolling average. Most sources would opt to install electronic data storage and processing systems which are presently available but have delivery periods of several months. Development of data reduction procedures for individual sources would add to the time needed for installation and initiation of the data gathering.

Sources that do not have SO_2 monitoring systems installed would have to order equipment, prepare the measurement sites, install the monitors, conduct the performance specification tests, and develop a quality assurance/quality control program to maintain the quality of the data. The time required to complete these tasks could take 1 year. Most of the above tasks would also have to be done by sources that would use fuel sampling and analysis procedures in lieu of continuous monitors. Not all of the sources which now perform fuel sampling and analysis follow the procedures specified in Method 19A. In some cases, modification of existing sampling or analysis procedures may be necessary.

A new SO_2 stack testing method (Method 6B), was promulgated in the Federal Register on December 1, 1982 (47 FR 56073) and is included in this proposal as an optional SO_2 measurement procedure. Use of Method 6B to determine SO_2 emissions would suggest that less than a 1-year lead time would be necessary for implementing the proposal; however, Method 6B was only recently promulgated and at present, no manufacturers commercially market a Method 6B sampling system. Based on these factors, EPA has concluded that a 1-year lead time for complying with the revised monitoring requirements would be reasonable. Owners or operators of facilities that wish to implement the revision prior to the 1-year period may apply to the Administrator for approval. Until the revision is implemented, Subpart D would remain in effect in its present form and compliance would continue to be determined through the use of Method 8.

Compliance Methods

The proposed SO_2 compliance provisions would replace Method 5 with Method 19A. Under the proposal, a source employing a continuous emission monitoring system to determine SO_2 emissions would use hourly data averaged for the past 30 boiler operating days to determine a 30-day average emission rate. This procedure is repeated for each day and results in the calculation of a 30-day rolling average emission rate. SO_2 emissions data collected during startup, shutdown, or system malfunction are not included in calculation of the 30-day rolling average emission rate. However, such periods must be identified in the quarterly SO_2 emissions report. If SO_2 emissions are measured through the use of Method 6B or by fuel sampling and analysis, as allowed under proposed Method 19A, SO_2 emissions report. If SO_2 emissions a daily basis and the SO_2 emission rate for the past 30 boiler operating days would be averaged to determine a 30-day average emission rate.

In calculating SO_2 emission rates, all valid SO_2 emissions data are used. It is recognized, however, that data may not be available for 100 percent of the time. Under the proposal, minimum data requirements are included and supplemental sampling would be required, if necessary, to assure that the data requirements are met. For SO_2 continuous emission monitoring systems, the minimum SO_2 data availability requirements would be 22 days of SO_2 emissions data for each 30 days of boiler operation and for fuel sampling and analysis systems and Method 6B stack testing procedures would be 27 days of SO_2 emissions data for each 30 days of boiler operations.

In announcing the use of continuous emission monitors for compliance determinations in Subpart Da in June 11, 1979, EPA indicated that quality assurance procedures were being developed (44 FR 33611). During 1980 and 1981, EPA distributed draft quality assurance procedures for continuous monitoring systems for technical review. When these procedures complete review and are adopted, they will be applicable to SO_2 continuous emission monitors used under today's proposal and Subpart Da. The procedures would require daily instrument drift measurement and quarterly accuracy audits. Additionally, EPA recently promulgated changes in Performance Specification 2 and 3 (Appendix B) which will simplify the continuous emission monitoring system performance evaluation required under § 60.13.

Method 6B may be used to determine daily SO_2 stack emission rates instead of continuous emission monitors. Method 6B uses an SO_2 collection system, based upon Reference Method 6, with an on/off timer to collect an integrated SO_2 sample over a 24-hour period. Analysis of the Method 6B sample provides a 24-hour integrated SO_2 emission rate.

If fuel sampling is selected for determining the daily SO_2 emission rate, sampling systems meeting the minimum requirements of the specific portion of ASTM Method D-2234 (coal) and ASTM Method D-270 (oil) included in Method 19A would be used. These are the same sampling methods included in Method 19 for new electric utility steam generating units subject to Subpart Da. For coal-fired steam generators, sampling on a daily "as-fired" basis in proposed. This would mean that coal would be sampled as the coal silos (bunkers) that supply coal to the coal pulverizers are filled. The coal sample would be analyzed for sulfur content and specific heat, the potential SO_2 emission level (ng/J, lb per million Btu) would be calculated, and used as the 24-hour SO_2 emission rate for the day the coal was bunkered. For fuel oil, a "drip type" sample would be collected at the burner while oil is being fired. Fuel samples would be analyzed using ASTM procedures (included in Method 19A).

For coal-fired steam generators, the proposal assumes that 95 percent of the sulfur in the coal is discharged to the

atmosphere as SO_2. This assumption is based upon studies which indicate that about 5 percent of the sulfur in the coal is retained in the pulverizer rejects, bottom ash, and fly ash. The owner or operator of a steam generator may petition the Administrator to permit use of a lower value for the sulfur in the coal discharged to the atmosphere, provided data are made available to substantiate a lower value.

Under the proposal, the fuel sampling and analysis procedures contained in Method 19A are included as an EPA approved "alternative test method." As defined under § 60.2 and discussed under § 60.8(b), the fuel sampling option under Method 19A could be selected by an owner or operator to determine SO_2 emissions; however, since it is an alternative test method, EPA or the implementing State air pollution control agency retains the authority to require periodical SO_2 testing by Method 6B or continuous emission monitors to demonstrate the adequacy of the alternative test method.

Proposal of the fuel sampling and analysis procedures as alternative test methods is based on the Administrator's judgment that these procedures are sufficiently accurate to be used as a basis for determining compliance with the standard. Under section 307(b)(2) of the Act, the owner will be precluded from challenging these procedures in any enforcement proceeding. Of course, use of these procedures is optional; any owner that wishes not to use them to determine compliance is free to choose either of the other two methods. Finally, as with any alternative method, the Administrator retains the authority to withdraw approval for its use at a particular facility if, in his judgement, it would not be sufficiently accuate to determine compliance at that facility.

Under the proposal, ASTM D-2234 Type I, Conditions A, B, or C, and Systematic Spacing would be used for coal sampling. This approach would allow both automated and manual coal sampling methods to be used; however, automated sampling is expected to predominate. For units not using automated coal sampling systems or for supplemental sampling due to failure of the primary system, manual sampling would be done in accordance with ASTM requirements, including proper sampling device geometry, number of sample increments, and increments taken evenly spaced in time or position.

In cases where more than one steam generator subject to Subpart D is installed at a site, a single fuel sampling system may be used to sample the coal as it is bunkered to individual units. A daily "as fired" coal sample would be collected for each unit and would be analyzed to determine the daily SO_2 emission rate for each unit.

Because of the wide variation in design and operation of steam generation facilities, there may be alternative SO_2 monitoring sites, fuel sampling locations, or procedures that may be appropriate for specific steam generators. In such cases, the owner or operator of a facility may petition the Administrator to approve other alternate monitoring procedures.

Miscellaneous

Under Executive Order 12291, EPA is required to judge whether this action would be a "major rule" and, therefore, subject to certain requirements of the Order. The Agency has made a preliminary determination that the revision would result in none of the adverse economic effects set forth in Section 1 of the Order as grounds for finding a "major rule." While this action is primarily a clarification of an earlier rule, there are some additional monitoring and reporting requirements. However, the additional costs are far less than the $100 million specified in the Order as defining a "major rule." Moreover, the revision will not result in a major increase in costs or prices and will not disrupt market competition. The Agency has, therefore, concluded that this revision would not be a "major rule" under Executive Order 12291.

Additionally, under Section 317 of the Clean Air Act, the Administrator is required to prepare an economic impact assessment for revisions determined by the Administrator to be substantial. The Administrator has determined that these revisions are not substantial and has not prepared an economic impact assessment.

The reporting and recordkeeping provisions of the regulation that this rulemaking revises have previously been cleared by OMB (OMB clearances 2060-0207 and 2060-0142). A clearance package reflecting the reporting requirements contained in this proposal has been submitted to OMB for review under Section 3504(h) of the Paperwork Reduction Act of 1980. Comments on these requirements should be submitted to the Office of Information and Regulatory Affairs of OMB, Attention: Desk Officer for EPA. The final rule package will respond to any OMB or public comments on information collection requirements.

Pursuant to 5 U.S.C. 605(b), the Administrator certifies that these revisions do not have a significant impact on a substantial number of small entities. The proposed revision will not affect a substantial number of small entities since the standard only applies to steam generators larger than 73 MW (250 million Btu per hr) heat input and well over 90 percent of these facilities will be large electric utility and industrial manufacturing companies. If the standards does not apply to any small entities, the impacts are insignificant as the emission monitoring costs would be less than 1 percent of the annualized boiler costs.

List of Subjects in 40 CFR Part 60

Air pollution control, Aluminum, Ammonium sulfate plants, Asphalt, Cement industry, Coal copper, Electric power plants, Glass and glass products, Grains, Intergovernmental relations, Iron, Lead, Metals, Metallic minerals, Motor vehicles, Nitric acid plants, Paper and paper products industry, Petroleum, Phosphate, Sewage disposal, Steel sulfuric acid plants, Waste treatment and disposal, Zinc, Tires, Incorporation by reference, Can surface coating, Sulfuric acid plants, Industrial organic chemicals, Organic solvent cleaners.

(Sec. 111, 301(a) of the Clean Air Act, as amended; 42 U.S.C. 7411, 7601(a))

Dated: October 12, 1983.

Alvin L. Alm,

Acting Administrator.

PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

In 40 CFR Part 60, §§ 60.41, 60.43, 60.45, and 60.46 are amended and §§ 60.48 and 60.49 are added as follows:

1. Section 60.41 is amended by adding paragraphs (g) and (h) as follows:

§ 60.41 Definitions.

* * * * *

(g) "24 hour period" means the period of time between 12:01 a.m. and 12:00 midnight. A starting time other than 12:01 a.m. may be used for the 24-hour period. If a starting time other than 12:01 a.m. is used, the starting time must be defined in the quarterly emissions report and must be constant for the entire calendar quarter.

(h) "Boiler operating day" means a 24-hour period during which any fossil fuel is combusted in the steam generator.

2. Section 60.43 is amended by adding paragraph (d) as follows:

§ 60.43 Standard for sulfur dioxide.

* * * * *

(d) Compliance with the emission limitations under this Section are determined on a 30-day rolling average basis in accordance with Method 19A (Appendix A).

3. Section 60.45 is amended by revising paragraphs (b)(2), (4), and (e); deleting paragraphs (f) and (g)(2), and adding paragraphs (b)(5), (h), (i), (j), (k), and (l) as follows:

§ 60.45 Emission and fuel monitoring.

• • • • •

(b) • • •

(2) The continuous emission monitoring system for measuring sulfur dioxide required under paragraph (a) of this Section is not necessary, if Method 6B or the alternative fuel sampling and analysis procedure under Method 19A (Appendix A) is used. The fuel sampling and analysis procedures included in Method 19A are approved as alternative SO_2 test methods for steam generators subject to this subpart and a written application for approval under § 60.13(j) is not required. The fuel sampling and analysis procedures in Method 19A are alternative test methods and the Administrator retains the authority to periodically require SO_2 testing by Method 6B or continuous emission monitors or to withdraw the approval for specific facilities.

• • • • •

(4) If an owner or operator does not install any continuous monitoring systems for sulfur oxides and nitrogen oxides as provided under paragraphs (b)(1) and (b)(3) or (b)(1) and (b)(5) of this Section, a continuous monitoring system for measuring either oxygen or carbon dioxide is not required.

(5) For affected facilities that combust more than 75 percent wood or wood residue on a quarterly (calendar) heat input basis, a continuous monitoring system for measuring sulfur dioxide emissions in not required. Such facilities are required to maintain quarterly records of percent of wood or wood residue fired on a heat input basis.

• • • • •

(e) For any continuous monitoring system installed under paragraph (a) of this Section, the following conversion procedure shall be used to convert the continuous monitoring data into units of the applicable standards (ng/J, lb/million Btu):

(1) For sulfur dioxide data, procedures under Section 3 of Method 19A (Appendix A) are used.

(2) For nitrogen oxides data, procedures under Section 5 of Method 19 (Appendix A) are used.

(f) [Reserved]

(g) • • •

(2) [Reserved]

• • • • •

(h) The continuous monitoring systems under paragraph (a) of this section are operated and data are recorded during all periods of operation of the affected facility including periods of startup, shutdown, and malfunction except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments.

(i) When sulfur dioxide emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, emission data are obtained by using an alternate monitoring procedure under Method 19A or by using other monitoring systems as provided by the Administrator as necessary to provide emission data as required under paragraph (k) of this section.

(j) For continuous emission monitoring systems, the 1-hour average SO_2 emissions required under paragraph § 60.13(h) are expressed in ng/J (lbs/million Btu) heat input and used to calculate the average emission rates under § 60.48. The 1-hour averages are calculated using the data points required under § 60.13(b). At least two points must be used to calculate the 1-hour averages.

(k) The minimum data requirements for sulfur dioxide emissions data collected using Method 19A are as follows:

(1) For continuous emission monitoring systems, data from at least 75 percent of the boiler operating hours per day in at least 22 out of 30 successive boiler operating days are required.

(2) For stack testing (Method 6B), data from at least one test run per day in at least 27 out of 30 successive boiler operating days are required.

(3) For coal sampling and analysis, data from coal samples representative of the coal supplied to the steam generator or to the coal silos (bunkers) each boiler operating day in at least 27 out of 30 successive boiler operating days are required.

(4) For oil sampling and analysis, data from oil samples representative of the oil supplied to the steam generator each boiler operating day in at least 27 out of 30 successive boiler operating days are required.

(l) In meeting the data requirements under paragraph (k) of this section, a combination of the test procedures included under Reference Method 19A (Appendix A) may be used. If SO_2 emissions data from continuous emission monitoring systems under paragraph (k)(1) of this section are supplemented with SO_2 emissions data from stack testing (Method 6B) or by fuel sampling and analysis procedures contained in Method 19A, the minimum data requirements of paragraph (k)(1) o this section apply.

4. Section 60.46 is amended by revising paragraph (a)(4), (c) and (f) and removing paragraph (d) as follows:

§ 60.46 Test methods and procedures.

• • • • •

(a) • • •

(4) Method 19A for sulfur dioxide emission rate and

• • • • •

(c) For Method 7, the sample site shal be the same as that selected for Metho 5. The sampling point in the duct shall be at the centroid of the cross Section o at a point no closer to the wall than 1 m (3.28 ft.). Removed

(d) [Reserved]

• • • • •

(f) For each run using the methods specified by paragraphs (a)(3) and (a)(5 of this section, the emissions expressed in ng/J (lb/million Btu) are determined following the procedures in Section 5 o Method 19 (Appendix A) (see § 60.47 fo sulfur dioxide emissions calculations).

• • • • •

5. Sections 60.48 and 60.49 is added a follows:

§ 60.48 Sulfur dioxide compliance provisions.

(a) After the initial performance test required under § 60.8, compliance with the sulfur dioxide emission limitations under § 60.43 is based on the average emission rate for 30 successive boiler operating days [as determined followin the procedures under Method 19A (Appendix A)]. Following the initial performance test, a separate performance test is completed at the en of each boiler operating day and a new 30 day average emission rate for sulfur dioxide is calculated to determine compliance with the standards.

(b) For the initial performance test required under § 60.8, compliance with the sulfur dioxide emission limitations based on the average emission rates fo sulfur dioxide for the first 30 successive boiler operating days. The initial performance test is the only test in which at least 30 days prior notice is required unless otherwise specified by the Administrator. The initial performance test is to be scheduled so that the first boiler operating day of the 30 successive boiler operating days is completed within 60 days after achieving the maximum production rat at which the affected facility will be operated, but not later than 180 days after initial startup of the facility.

(c) In determining compliance with t standard following Method 19A, all sulfur dioxide emissions data (except

sulfur dioxide emissions data obtained during startup, shutdown, or malfunction) are included in determining compliance.

(d) If an owner or operator has not obtained the minimum quantity of emission data as required under § 60.45(k), compliance with the emission requirements under § 60.43 of this Subpart for the day on which the 30-day period ends may be determined by the Administrator by following the applicable procedures in Section 6 of Reference Method 19A (Appendix A).

§ 60.49 Sulfur dioxide reporting requirements.

(a) The owner or operator of any affected facility shall submit the written reports required under paragraph (b) of this section and Subpart A to the Administrator for every calendar quarter. All quarterly reports shall be submitted by the 30th day following the end of each calendar quarter.

(b) For sulfur dioxide, the following emission data are submitted to the Administrator for each 24-hour period:

(1) Calendar Date.

(2) The average sulfur dioxide emission rate (ng/J or lb/million Btu) for each 30 successive boiler operating days ending with the last 30-day period in the quarter; reasons for noncompliance with the emission standards, and description of corrective action taken.

(3) Identification of the boiler operating days for which pollutant or diluent data have not been obtained following methods under Method 19A (Appendix A); justification for not obtaining sufficient data; and description of corrective actions taken.

(4) Identification of the times when emission data from FGD equipped steam generators have been excluded from the calculation of average emission rates because of start-up, shut-down, malfunction, or other reasons; and justification for excluding data for reasons other than start-up, shut-down, or malfunction.

(5) For facilities combusting mixtures of fossil fuel and wood or fossil fuel and wood residue, the percentage of heat input to the steam generator provided by wood or wood residue during the calendar quarter.

8. Part 60, Appendix A is amended by adding Method 19A to read as follows:

Method 19A—Determination of Sulfur Dioxide Emission Rates From Fossil-Fuel-Fired Steam Generators

1. Principle and Applicability

1.1 Principle.

1.1.1 Fuel samples are collected and analyzed for sulfur and heat content and the sulfur dioxide emission rate is determined from the analysis data. Procedures are described for coal and oil; or

1.1.2 Sulfur dioxide and oxygen or carbon dioxide concentration data are obtained using emission testing procedures and are used to determine sulfur dioxide emission rates. Procedures are described for continuous emission monitoring systems using instrumental or manual techniques.

1.2 Applicability. This method is applicable for determining sulfur dioxide (SO_2) emission rates from fossil fuel-fired steam generators.

2. As-Fired Fuel Analysis

Collect the fuel samples from a location in the fuel handling or processing system that provides a sample representative of the fuel bunkered or consumed during a boiler operating day. For the purpose of this method, a fuel lot size is defined as the weight of fuel bunkered or consumed during each boiler operating day. For reporting and calculation purposes, the gross sample shall be identified with the calendar day on which sampling began. Alternate definitions of fuel lot sizes may be specified subject to prior approval of the Administrator.

2.1 Fuel Sampling.

2.1.1 Solid Fossil Fuel. Use coal sampling procedures meeting the requirements of ASTM D 2234 [1] Type I, Conditions A, B, or C and systematic spacing. As a minimum, determine the number and weight of increments required per gross sample according to paragraph 7.1 of ASTM D 2234[1]. As used in this method, systematic spacing is intended to include evenly spaced increments in time or increments based on equal weights of coal passing the collection area.

2.1.2 Liquid Fossil Fuel. Use the procedure for continuous sampling described in Method 19, Section 2, paragraph 2.2.1.

2.2 Fuel Analysis.

2.2.1 Solid Fossil Fuel. Determine the percent sulfur content (%S) and gross calorific value (GCV) of the solid fossil fuel on a dry basis fro each gross sample. Use ASTM D 2013[1] for sample preparation, ASTM D 3177[1] for sulfur analysis, ASTM D 3173[1] for moisture analysis and ASTM D 2015[1] for GCV determination.

2.2.2 Liquid Fossil Fuel. Determine the percent sulfur content (%S) and gross calorific value (GCV) of the liquid fossil fuel. Use ASTM D 240[1] for GCV determination and ASTM D 129[1] for sulfur analysis. These values can be assumed to be on a dry basis.

2.3 Calculation of Sulfur Dioxide Emission Rate Using Fuel Analysis Data.

2.3.1 Daily Emission Rate. Calculate the daily SO_2 emission rate as follows:

For Solid Fossil Fuel:

$$E_{so_2} = 0.95K\frac{(\%S)}{GCV} \quad \text{(Equation 19A-1)}$$

For Liquid Fossil Fuel:

$$E_{so_2} = \frac{K(\%S)}{GCV} \quad \text{(Equation 19A-2)}$$

Where:

E_{so_2} = SO_2 emission rate; ng/J (lb/10^6 Btu).

%S = Sulfur content of the fuel on a dry basis; weight percent.

0.95 = Allowance for 5.0 percent sulfur removal in coal pulverizer rejects and ash.

GCV = Gross calorific value of the fuel on a dry basis; kJ/kg (Btu/lb).

K = Conversion Factor: 2×10^3 for SI units; 2.0×10^4 for english units.

If more than one fuel type is bunkered or consumed during the day, use the following equation to calculate the daily sulfur content per unit of heat content as follow:

$$\frac{\%S}{GCV} = \sum_{k=1}^{n} Y_k \left(\frac{\%S_k}{GCV_k}\right) \quad \text{(Equation 19A-3)}$$

Where:

Y_k = The fraction of total heat input derived from each fuel type, k.

$\%S_k$ = Sulfur content of each fuel type, k, on a dry basis; weight percent.

GCV_k = Gross calorific value for each fuel type, k, on a dry basis; kJ/kg (Btu/lb).

n = Number of different fuel types.

For the purpose of this method, fuel type is meant to differentiate between classes of fossil fuel (e.g., solid or liquid), classifications of solid fossil fuel (e.g., bituminous or subbituminous coal), or grades of liquid fossil fuels (e.g., crude or residual). Sampling of fuel types contributing less than one percent of the total heat input in a boiler operating day (e.g., light fuel oils used during boiler startup or for combusiton stabilization in solid fossil fuel fired boilers) is not necessary.

2.3.2 Determination of 300-Day Rolling Average. Calculate the mean 30-day SO_2 emission rate for 30 successive boiler operating days (rolling average) as follows:

$$E_{30} = \frac{1}{n}\sum_{1}^{n} E_{SO_2} \quad \text{(Equation 19A-4)}$$

E_{30} = SO_2 emission rate as a 300-day rolling average; ng/J (lb/10^6 Btu).

n = Number of daily SO_2 emission rates obtained in the 30 boiler operating day period.

3. Continuous Emission Monitoring System (CEMS)

Measurement of SO_2 concentration and oxygen (O_2) or carbon dioxide (CO_2) at the same exhaust location representative of the total emissions are required. Install and operate the CEMS in accordance with 40 CFR 60, Appendix B, Performance specifications 2

[1] Use the most recent revision or designation of the ASTM procedure specified.

and 3 and as required in the applicable subpart.

3.1 Sampling. Use the CEMS data for SO_2 and O_2 or CO_2 concentrations obtained following the procedures in Section 3.

3.2 Determination of an F Factor. Select an applicable f factor as described in Method 19, Section 5.2.

3.3 Calculation of Emission Rate. Determine the hourly SO_2 emission rate as described in Method 19, Section 5.3.

3.4 Calculation of the 30-Day Rolling Average. Calculate the mean 30-day emission rate using all the available hourly averages in ng/J (lb/10^6 Btu) for 30 successive boiler operating days (rolling average) as follows:

$$E_{30} = \frac{1}{n} \sum_{1}^{n} E_{hour} \quad \text{(Equation 19A–5)}$$

where:

E_{30} = SO_2 emission rate as a 30-day rolling average; ng/J (lb/10^6 Btu).

n = Total number of hourly values available for calculation of the 30-boiler operating day average.

E_{hour} = Hourly SO_2 emission rate, average of at least two 15-minute measurement values and determined as in Section 3.2; ng/J (lb/10^6 Btu).

4. Manual Sampling Using Method 6B

Method 6B may be used as either an intermittent sample on a schedule of at least one increment per 2-hour interval or a continuous sample for a 24-hour composite for analysis. Measurement of SO_2 and CO_2 concentration at the same exhaust location representative of the total emissions are required. An initial stratification test is required to verify the adequacy of the sampling location. The stratification test shall consist of three paired runs of a suitable SO_2 and CO_2 measurement train installed and operated at the candidate location and a second similar train operated using a three (or more) point traverse. Method 6B, Method 6A, or a combination of Methods 6 and 3 are suitable measurement techniques.

The minimum requirements for selecting the traverse location are as follows: Establish a "measurement line" that passes through the centroidal area and in the direction of any expected stratification. (The centroidal area is a concentric area that is geometrically similar to the stack or duct cross section and is greater that 1 percent of the stack or duct cross-sectional area.) If this line interferes with the measurement at the candidate location, displace the line up to 30 cm (or 5 percent of the equivalent diameter of the cross section, whichever is less) from the centroidal area. Locate three traverse points at 16.7, 50.0 and 83.3 percent of the measurement line. If the measurement line is longer than 2.4 meters and pollutant stratification is not expected, the tester may choose to locate the three traverse points on the line at 0.4, 1.2, and 2.0 meters from the stack or duct wall. This option must not be used after wet scrubbers or a points where two streams with different pollutant concentrations are combined. The tester may select other traverse points provided that they can be shown to the satisfaction of the Administrator to provide a representative sample over the stack or duct cross section. If method 6B is used, sampling time and timer operation may be adjusted for the stratification test to collect an adequate sample volume; however, both sampling trains are to be operated similarly.

If the mean of the absolute difference between the three paired runs agree to within 10 percent, the location is adequate for the Method 6B 24-hour tests. If the agreement is not within 10 percent, choose a new location and repeat the stratification tests.

4.1 Sampling. All sample collection shall be within 3 cm of the sample location meeting the stratification test in section 4.0.

4.2 Determination of a F_c Factor. Select an applicable F_c factor as described in Method 19, Section 5.2.

4.3 Calculation of a Boiler Operating Day Emission Rate. Determine a daily SO_2 emission rate, E_{SO_2}, as described in Method 6A, Section 7.6.2 (Equation 6A–8); in ng/J (lb10^6 Btu).

4.4 Calculation of the 30-Day Rolling Average. Calculate the mean 30-day emission rate using the daily measured values in ng/J (lb10^6 Btu) for successive boiler operating days (rolling averages) as follow:

$$\overline{E}_{30} = \frac{1}{n} \sum_{1}^{n} E_{SO_2} \quad \text{(Equation 19A–6)}$$

where:

E_{30} = SO_2 emission rate 30-day rolling average, ng/J (lb/10^6 Btu).

E_{SO_2} = Daily SO_2 emission rates, ng/J (lb/10^6 Btu).

n = Number of daily SO_2 emission rates obtained in the 30 boiler operating day period.

5. Calculation of Emission Rate from Combined Cycle-Gas Turbine Systems

Determine the SO_2 emission rate from the steam generator as described in Method 19, Section 5.4

6. Calculation when Available Emission Measurement Data Are Less Than the Minimum

Perform the following calculations when the number of data values is less than the minimum required in the applicable subpart for calculation of the 30-day rolling average.

6.1 Mean Emission Rate. Calculate the mean emission rate for the reporting period using all emission measurement values (hourly averages for CEMS and daily averages for fuel sampling and Method 6B) and the following equation:

$$\bar{E} = \frac{1}{n}\sum_{i=1}^{n} E_{SO_2} \quad \text{[Equation 19A-7]}$$

where:

$\bar{E}$ = Mean SO_2 emission rate for the reporting period, ng/J (lb/10^6 Btu).

n = Number of available emission rate values for the reporting period hourly averages for CEMS, daily averages for other methods.

E_{SO_2} = Measured emission rate values, ng/J (lb/10^6 Btu).

6.2 Standard Deviation of Mean. Calculate the standard deviation of the mean of the available emission rate values using the following equation:

$$S_{\bar{E}} = \left[\sqrt{\frac{1}{n} - \frac{1}{max}}\right]\left[\sqrt{\frac{\sum_{i=1}^{n}(E - E_{SO_2})^2}{n-1}}\right] \quad \text{(Equation 19A-8)}$$

where:

$S_{\bar{E}}$ = Standard deviation of the mean of the emission values for the reporting period, ng/J (lb/10^6 Btu).

max = The maximum number of data values that should have been recorded during the reporting period.

n = The number of available emission rate values for the reporting period-hourly averages for CEMS, daily averages for other methods.

6.3 Confidence Limit. Calculate the upper and lower confidence limit for the mean emission rate using the following equation:

$E_L = \bar{E} - t_{0.95} S_{\bar{E}}$
(Equation 19A-9)

$E_U = \bar{E} + t_{0.95} S_{\bar{E}}$
(Equation 19A-10)

where:

E_L = The lower confidence limit for the mean emission rate; ng/J (lb/10^6 Btu).

E_U = The upper confidence limit for the mean emission rate; ng/J (lb/10^6 Btu).

$t_{0.95}$ = Values shown below for the indicated number of data points (n).

Values for $t_{0.95}$

n	$t_{0.95}$	n	$t_{0.95}$	n	$t_{0.95}$
2	6.31	8	1.89	22-26	1.71
3	2.42	9	1.86	27-31	1.70
4	2.35	10	1.83	32-61	1.68
5	2.13	11	1.81	62-91	1.67
6	2.02	12-16	1.77	92-151	1.66
7	1.94	17-21	1.73	152 or more	1.65

The values of this table are corrected for n-1 degrees of freedom. Use n equal to the number of emission rate values.

[FR Doc. 83-28366 Filed 10-20-83; 8:45 am]
BILLING CODE 6560-50-M

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT
3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959

BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
G. DOUG DUTTON
DISTRICT MANAGER

September 14, 1984

Ms. Cynthia Sawyer
Environmental Group Leader
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

Dear Ms. Sawyer:

Nassau County - AP
Container Corporation of America
No. 7 Power Boiler
Nitrogen Oxides and SO_2 Monitoring Requirement

The following information is provided to document the conversations with Mr. Bruce Mitchell and me on September 13, 1984.

Mr. Mitchell has indicated that he is willing to modify the construction permit for No. 7 power boiler to require an emissions limiting standard of 0.70 $lb/10^6$ BTU per CFR 40, Section 60.44(a)(3) subject to the following:

1. Certification that you have not used, are not using, and will not utilize lignite or a solid fossil fuel containing 25 percent by weight, or more of coal refuse.

2. That the permit condition be changed to limit future use of No. 7 power boiler to the fuel input specified by 40 CFR, Section 60.44(a)(3).

Please note that we have not received the additional information required for completion of the operating permit review for No. 7 power boiler. Also, please expedite the request for approval of your alternate method for monitoring sulfur dioxide.

Failure to complete the action required to obtain the operating permit for No. 7 power boiler most expeditiously will necessitate enforcement action by the Department.

Please send me copies of all letters to the Bureau of Air Quality Management and EPA.

Your cooperation is appreciated.

Sincerely,

John C Brown, Jr.

John Brown, P.E.
Supervisor Air Section

BPV

JB:vk

cc: Bruce Mitchell
Enforcement

File: AC 45-35532

Container Corporation of America

Paper Mill Division

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-5551

September 13, 1984

Mr. Bruce Mitchell
DER - Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Dear Mr. Mitchell:

As discussed in our phone conversation this morning, this letter is written verification that we do not plan to burn lignite or 25% by weight of coal refuse in No. 7 Coal Fired Power Boiler. No. 7 Power Boiler only burns washed bituminous coal. My understanding from our conversation is this verification will allow the NO_x limit to be changed from .6 lb/mmBTU to .7 lb/mmBTU, because the .6 lb/mmBTU only applies to boilers burning lignite or coal refuse [as stated in 40 CFR 60.44(a)(4)] and will also add a specific condition stating we cannot burn lignite or coal refuse.

If you have any additional questions or comments, please do not hesitate to call.

Sincerely yours,

CONTAINER CORPORATION OF AMERICA

Cynthia L. Sawyer

Cynthia L. Sawyer
Environmental Group Leader

jrb

DER
SEP 21 1984
BAQM

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

NORTHEAST DISTRICT, JACKSONVILLE

9/11 Bruce 9/12/84 Please investigate & draft reply. I am guilty of holding this one. Clair

9/12/84 rcd 11:00 AM via CHF BB - P.S. Told BT of the assignment.

TO: Clair Fancy, BAQM

FROM: JB John Brown

DATE: August 27, 1984

SUBJECT: Nassau County - AP
Container Corporation of America
#7 Power Boiler - Permit No. AC45-35532
Ruling on Permit Condition

DER
AUG 30 1984
BAQM

Please review the attached request from Container to determine whether a continuous monitoring system (CEMS) for nitrogen oxides is required on #7 power boiler.

The construction permit was issued based on 0.60 lb/MMBTU allowable emissions for nitrogen oxices. This would suggest the requirement for a continuous monitoring system if more than 0.36 lb/MMBTU nitrogen oxides were observed during performance tests. (60.45 (b)(3), Subpart D, CFR). 0.45 lb/MMBTU were observed during performance testing.

The applicant suggests that the applicable standard in 60.44, Subpart D is 0.70 lb/MMBTU and therefore continuous monitoring is required only if 0.49 lb/MMBTU nitrogen oxides were observed during performance testing.

Please note that the applicant is not contesting the 0.60 lb/MTU NO_x allowable emissions, but feels that the CEMS should be based on paragraph 60.44(a)(3), Subpart D.

JB:vk

Container Corporation of America

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

BPA

August 21, 1984

Mr. John C. Brown Jr., P.E.
Air Section Supervisor
FDER
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Dear Mr. Brown:

I have reviewed your August 14, 1984 letter in which you stated that we are to submit a written request for a ruling by the Department on whether .49 or .42 lb/MMBTU applies to the NO_x continuous monitoring requirement. This letter will serve as that request. I have also sited specific sections of 40 CFR, Part 60, Subpart D that substantiate our position that .49 lb/MMBTU is the appropriate value for our No. 7 Solid Fossil Fuel Boiler.

In accordance with section 60.45 (b)(3), Subpart D, we elected to delay the installation of a continuous NO_x monitor until after the initial performance tests under section 60.8 were completed. Section 60.45 (b)(3) also states that if the owner or operator demonstrates during the performance test that emissions of nitrogen oxides are less that 70 percent of the applicable standards in section 60.44, a continuous monitoring system for measuring nitrogen oxides emissions is not required. Section 60.44 (a)(3) lists .70 lb per million BTU as the applicable standard for solid fossil fuel boilers. Our performance test showed .43 lb per million BTU or 61 percent of the applicable standard sited above. Therefore, a continuous monitoring system for nitrogen oxides is not required.

Based on the above-referenced sections from New Source Performance Standards we anticipate a favorable ruling by the Department on this matter.

Sincerely,

CONTAINER CORPORATION OF AMERICA

David R. James

David R. James
Environmental Engineer

DRJ/jrb

NOTE: Department reviews indicated 0.45 lb/MMBtu 8hr average
JRB

9-12-84
@ 1:25 PM
Requested that Mr. James send us a letter to exclude the exempted fuels from ever having been fired in the PB.
BBO

The Florida Times-Union Jacksonville Journal

FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared _____

George A. Dan

who on oath says that he is

Retail Advertising Supervisor of The Florida Times-Union, and

Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,

Florida; that the attached copy of advertisement, being a _____

Legal Notice

in the matter of Notice of proposed agency action

in the _____ Court,

was published in The Florida Times-Union

in the issues of April 1, 1983

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me this 1st day of April A.D. 1983.

Notary Public, State of Florida at Large.

My Commission Expires Notary Public, State of Florida My Commission Expires July 9, 1986 Bonded Thru Troy Fain - Insurance, Inc.

DA 444

BAP
DER
APR 11 1983
BAQM

NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to issue a permit to the Container Corporation of America for the construction of a multiple-effect evaporator system #6 (system includes the multiple-effect evaporators, the associated condenser(s) and hotwell(s), and a concentrator) at the applicant's existing facility in Fernandina Beach, Nassau County, Florida. This permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code. A determination of Best Available Control Technology (BACT) was not required.

A person who is substantially affected by the department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The application, technical evaluation and department intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

DER Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301
DER Northeast District
3426 Bills Road
Jacksonville, FL 32207

Comments on this action shall be submitted in writing to Bill Thomas of Tallahassee office within thirty (30) days of this notice.

State Construction Permit: AC 45-35
Federal Permit: PSD-FL-062

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4AW-AM

JAN 28 1983

DER

JAN 31 1983

BAQM

Mr. Eric Schmidt
Environmental Department Group Leader
Container Corporation of America
Paper Mill Division
North Eighth Street
Fernandina Beach, Florida 32034

Dear Mr. Schmidt:

This letter is in response to your letter dated December 21, 1982 to Mr. Thomas Devine informing us of the upcoming start up of the #7 power boiler located at your Fernandina Beach location.

We appreciate your timely notification and request that you notify Mr. Steve Smallwood of the Florida Department of Environmental Regulation of the testing dates so they may plan to observe the compliance testing. The Florida Department of Environmental Regulation has recently been delegated the responsibility for New Source Performance Standards and Prevention of Significant Deterioration Compliance Testing.

If we may be of any further assistance please call Brian Beals or Jim Littell of my staff at 404/881-4901.

Sincerely,

James T. Wilburn, Chief
Air Management Branch
Air & Waste Management Division

cc: Mr. Steve Smallwood, Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

KAHEL		FANCY		STARNES	
~~BLOMMEL~~		THOMAS		MARTY HALL	
BARKER		GEORGE		MARSHALL MOTT-SMITH	
J.ROGERS		PALAGYI		~~Mitchell~~ 2/17/83	

REMARKS

Coordinate & follow-up as appropriate

2/15 Ed - copy distant, Stanlett to Bruce's file

OK 2-16-83 Ed

INFORMATION

- REVIEW & RETURN
- REVIEW & FILE
- INITIAL & FORWARD

DISPOSITION

- REVIEW & RESPOND
- PREPARE RESPONSE FOR MY SIGNATURE
- FOR YOUR SIGNATURE
- LET'S DISCUSS
- SET UP MEETING
- INVESTIGATE & REPT
- INITIAL & FORWARD
- DISTRIBUTE
- CONCURRENCE
- FOR PROCESSING
- INITIAL & RETURN

FROM: STEVE SMALLWOOD

DATE 2-9-83

PHONE

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

May 12, 1981

Mr. Cliff Murray
United Association of Journeyman
and Apprentice of the Plumbing
and Pipefitting Industry of the
United States and Canada
Local No. 234
5411 Cassidy Road
Jacksonville, Florida 32205

Dear Mr. Murray:

Enclosed is a copy of the Departments file pertaining to the issuance of one Air Construction Permit to Container Corporation of America, Fernandina Beach, Florida. The permit to construct one coal/wood-waste boiler No. 7 was issued March 12, 1981.

The file duplication cost is based on five cents a page plus 2.40 for postage, for a total cost of $11.50.

Please make the check payable to Department of Environmental Regulation, Attention: Mr. Dan McCall. Send check to: Edward Palagyi, Department of Environmental Regulation, Bureau of Air Quality Management, 2600 Blair Stone Road, Tallahassee, Florida 32301

If I can be of further assistance, please call (904) 488-1344.

Sincerely,

Edward Palagyi

Edward Palagyi, Engineer
Bureau of Air Quality Management

Enclosure

cc: Mr. Johnny Cole
Mr. Dan McCall

JACKSONVILLE, DUVAL COUNTY, FLORIDA

BEST AVAILABLE COPY

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared .....

John R. Mayo, who on oath says that he is

Retail Advertising Manager of The Florida Times-Union, and

Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,

Florida; that the attached copy of advertisement, being a .....

Legal Notice

in the matter of Application/Construction permit to Container

Corporation of America

in the ..... Court,

was published in The Florida Times Union,

in the issues of February 2, 1981

The Florida Department of Environmental Regulation (DER) has received an application from and intends to issue a Construction Permit to Container Corporation of America for the construction of a coal/wood waste boiler to be located at their existing plant on the inland side of Amelia Island, in Nassau County. A determination of Best Available Control Technology was required. Copies of the Applications, BACT Determination, Technical Evaluation, and DER Intent are available for inspection at the following offices: DER, 2600 Blair Stone Rd., Tallahassee, Fl 32301; DER, St. Johns River Subdistrict, 3426 Bills Road, Jacksonville. Comments on this action shall be submitted in writing to: Willard Hanks of the Tallahassee Office, within 30 days of this notice.

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, the Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me

this 2nd day of

February A.D. 1981

John R Mayo

Notary Public,
State of Florida at Large.

My Commission Expires .....

Notary Public, State of Florida at Large
My Commission Expires July 3, 1982
Bonded by Fireman's Fund & Casualty Company

DA 444

Container Corporation of America

Paper Mill Division

North Eighth Street
Fernandina Beach, Florida 32034

Phone: 904 261-5551

February 24, 1981

Mr. Willard Hanks
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Re: Proposed Permit for our
#7 Power Boiler

Dear Mr. Hanks:

Our comments on the conditions in the proposed permit for the #7 Power Boiler appear below.

Specific Condition No. 1

Reporting of delays should be required only if the delay would extend completion beyond the expiration date of the construction permit. The second sentence in this condition should be revised to read as follows:

> "The applicant shall report to the Department any delays in construction of the project covered by this permit that may delay completion beyond the expiration date set forth herein."

Specific Condition No. 3

The proposed continuous emission monitoring in Specific Condition No. 3 should be revised to track the requirements in the New Source Performance Standards for Fossil-Fuel-Fired Steam Generators, 40 CFR, Part 60, Subpart D. Specifically, NOx emissions should be measured during the initial boiler compliance tests and if NOx emissions are less than 0.49 pounds per million Btus, a continuous monitoring system should not be required. See 40 CFR Section 60.45 (b)(3). Also, as provided in 40 CFR Section 50.45(b)(2), fuel sampling and analysis should be an acceptable alternative to continuous monitoring of sulfur dioxide emissions. A comparison of coal sampling and continuous monitoring is available in a study performed for Tampa Electric Company which was submitted to the FDER as part of TECO's planned fuel conversion at its Gannon generating station.

Specific Condition No. 3 should therefore be revised to read as follows:

> "The applicant shall install, calibrate, maintain, and operate continuous emission monitoring systems for measuring opacity, sulfur dioxide, nitrogen oxides, and either oxygen or carbon dioxide as provided in 40 CFR 60.45(a) and (b), as referenced by 17-2.21(2)(a)."

Specific Condition No. 9

The emission limitation on sulfur dioxide is 1.2 pounds per million Btus. (See Specific Condition No. 10.) There should be no limitation on the sulfur content of the coal beyond that necessary to achieve this limitation. We therefore believe that this condition should be deleted as the necessary monitoring or sampling to demonstrate compliance is provided in Specific Condition No. 3. If the condition is retained, it must be modified. As proposed, the condition limits the sulfur content of the coal to a flat 0.75%. This limitation does not take into account either the heating value of the coal (i.e., as the Btus per pound increase, so should the allowable percent sulfur) or the sulfur that is retained in the flyash. It is the accepted U.S. EPA estimate that 5% of the sulfur in the coal remains in the ash and is not emitted as sulfur dioxide. Therefore, if Specific Condition No. 9 is retained, and we urge that it be deleted, it should be revised to read as follows:

> "The maximum sulfur content of the coal shall not exceed that given by the formula: $S=(0.0000632y)(\frac{100}{w})$, where S = percent sulfur in the coal, y = Btus/pound coal, and w = percentage of total heat input supplied by coal."

Specific Condition No. 12

Specific Condition No. 12, particularly when read with Specific Condition No. 6 (which requires that an operating permit application be submitted at least 90 days before expiration of the construction permit), does not allow sufficient time to break in the new boiler before shutdown of the other boilers. For offset purposes, U.S. EPA has allowed existing facilities to be operated for up to six months after replacement facilities commence operation. As the new boiler will be much more efficient and cost effective than the facilities to be shutdown, we have a strong interest in putting it to full use as soon as possible and no interest in continuing to use the less efficient facilities. In view of this, there is no necessity for a condition to force their early retirement.

Therefore, to avoid possible problems in the event of difficulties in bringing the new boiler up to full load, Specific Condition No. 12 should be revised to read as follows:

> "As soon as practicable after initial operation of the new boiler, No. 3 recovery boiler and its associated smelt tank and No. 6 power boiler will be retired, and No. 3 power boiler will be put on "cold" standby. The Department will be notified whenever No. 3 power boiler is placed into operation."

Expiration Date

While we will be making efforts to accelerate completion, at the present time we project that the project may not be complete before March 1983. Since Specific Condition No. 6 would require operation and testing of the boiler at least three months before the expiration date, the expiration date should be no earlier than September 1983. Even if there is no slippage in the construction schedule, this would only allow two months for boiler shakedown and testing before the operating permit application had to be submitted.

In order to expedite the permitting process, if you have any questions, please call.

Sincerely,

CONTAINER CORPORATION OF AMERICA
Fernandina Beach Mill Division

Richard W. Galphin
General Manager

RWG/js

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

January 14, 1981

Mr. R.W. Galphin
General Manager
Container Corporation of America
Fernandina Beach Mill Division
North Eight Street
Fernandina Beach, Florida 32034

Dear Mr. Galphin:

This is to confirm that the Department has received the supplemental material to your application for construction of power boiler No. 7, #AC 45-35532.

As of December 12, 1980, your application is considered complete and we have begun to process it.

Preliminary determination and draft permit will be completed around February 5, 1981.

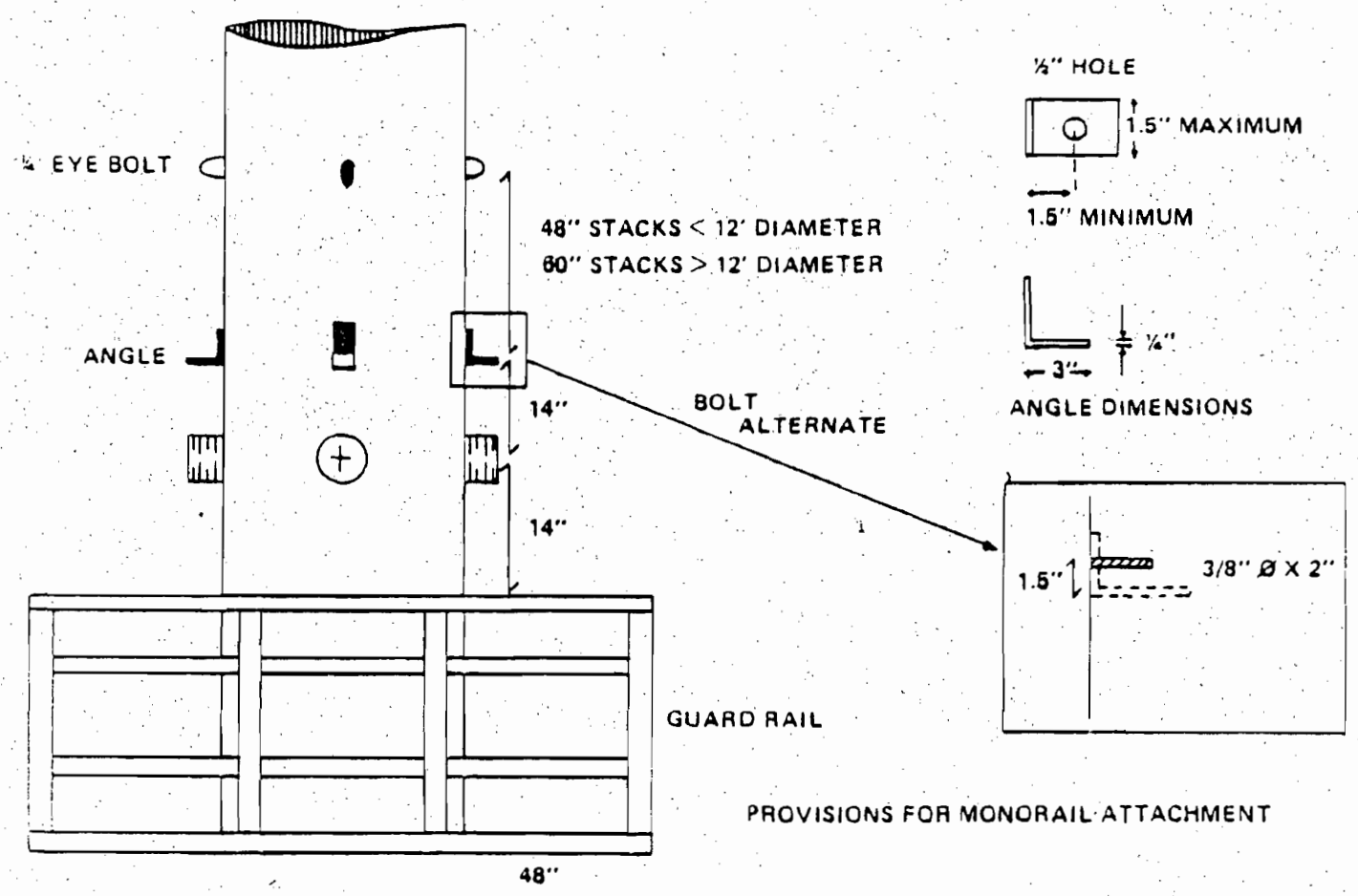
Sincerely,

Willard Hanks

Willard Hanks
Engineer,
Bureau of Air Quality Management

WH:dav

AN EYEBOLT AND ANGLE SHALL BE ATTACHED DIRECTLY ABOVE EACH PORT OF VERTICAL STACKS AND ABOVE EACH VERTICAL SET OF PORTS FOUND ON THE SIDES OF HORIZONTAL DUCTWORK 1.8 WORKING PLATFORMS. THE DIMENSIONS AND PLACEMENT OF THESE FIXTURES ARE SHOWN IN FIGURE 1-1.



PROVISIONS FOR MONORAIL ATTACHMENT

IF EYEBOLT IS MORE THAN 120 INCHES ABOVE THE PLATFORM A PIECE OF CHAIN SHOULD BE ATTACHED TO IT TO BRING THE POINT OF ATTACHMENT WITHIN SAFE REACH. THE EYEBOLT SHOULD BE CAPABLE OF SUPPORTING A 500 POUND WORKING LOAD.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____ Loctn.: _____		
To: _____ Loctn.: _____		
To: _____ Loctn.: _____		
From: _____ Date: _____		
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Ed Palagyi

FROM: Teresa Heron T.H.

DATE: November 24, 1980

SUBJ: BACT Recommendation Container Corporation

This project is the construction of a 1021 MMBTU/hr power boiler (No. 7) to replace the existing power boiler No. 3,power boiler No. 6 and recovery boiler No. 3 at the applicant's mill located on Fernandina Beach.

I concur with the applicants NSPS emission limits and their proposed control technology as BACT.
The BACT are as follows:

SO_2 1.2 lb.MMBTU	and low sulfur content (0.75%s) bituminous coal
Particulate Matter 0.1 lb/MMBTU	and the use of mechanical dust collectors, followed by an electrostatoc precipitator.
NO_x 0.7 lb/MMBTU	This will be accomplished by minimizing excess air and staging combustion via overfire and underfire air ratios.

Coal preparation and Handling

Enclose the coal unloading area

Employ baghouses on conveyor transfer points.

TH:dav

Container Permit file (Bob King) file

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

November 6, 1980

Mr. R.W. Galphin
General Manager
Container Corporation of
America
Fernandina Beach Mill Division
North Eight Street
Fernandina Beach, Florida 32034

Dear Mr. Galphin:

The Department has received your application for a permit to construct a new coal/wood waste boiler in Nassau County, Florida. Based on the initial review of your proposal, it has been determined that additional inforamtion is needed before we can process the application. The information required to complete the application is described below.

1. If the application includes coal preparation and handling facilities what are the potential and actual emission rates from the coal preparation and handling facilities?

2. What kind of fuel oil will be used for start ups and emergencies? Give analysis information for the fuel oil.

As soon as we receive the requested information, we will begin processing your application. If you have any questions on the data requested, please call Bob King at (904) 488-1344.

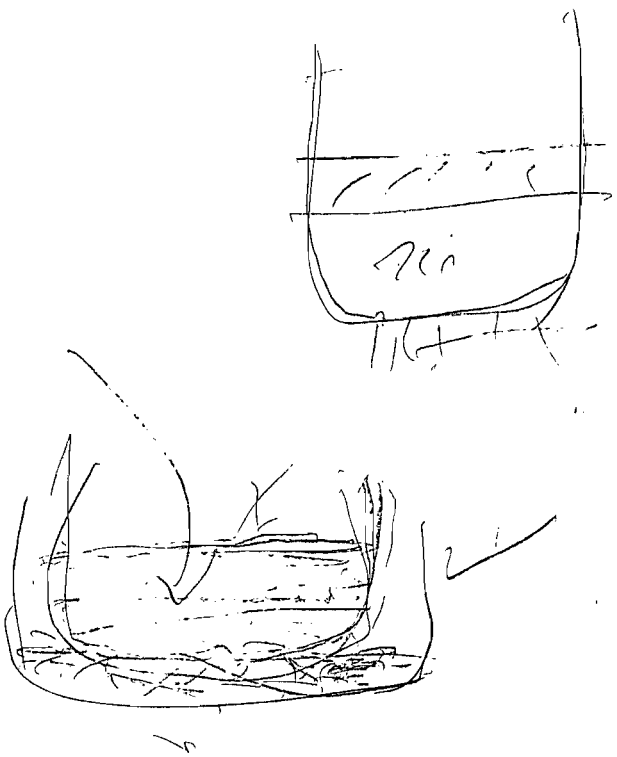
Sincerely,

Bob Thomas

for Steve Smallwood, Chief
Bureau of Air Quality Management

SS:dav

Sweet & sour pork.



BEST AVAILABLE COPY

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        DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD
FILE#000000035532 COE#             DER PROCESSOR:HANKS                 DER OFFICE:TL
FILE NAME:CONTAINER CORP. AMERICA  DATE FIRST REC: 10/09/80  APPLICATION TYPE:
APPL NAME:GALPHIN, R.W.             APPL PHONE:(904)261-5551   PROJECT COUNTY:
ADDR:N. 8TH ST.                          CITY:FERNANDINA BEACH  ST:FLZIP
AGNT NAME:LAWSON, J.R.              AGNT PHONE:(404)294-7575
ADDR:4329 MEMORIAL DRIVE                 CITY:DECATUR              ST:GAZIP:300

ADDITIONAL INFO REQ:  / /     / /     / /    REC:  / /     / /     / /
APPL COMPLETE DATE:  / /   COMMENTS NEC:Y DATE REQ:  / /    DATE REC:  / /
LETTER OF INTENT NEC:Y  DATE WHEN INTENT ISSUED:  / /     WAIVER DATE:  / /

HEARING REQUEST DATES:                       / /          / /          / /
HEARING WITHDRAWN/DENIED/ORDER -- DATES:     / /          / /          / /
HEARING ORDER OR FINAL ACTION DUE DATE:      / /     MANUAL TRACKING DESIRED:
    THIS RECORD HAS BEEN SUCESSFULLY ADDED            10/09/80      14:06:02
FEE PD DATE#1:10/09/80 $0020   RECEIPT#00033554 REFUND DATE:  / /   REFUND $
FEE PD DATE#2:  / /    $       RECEIPT#         REFUND DATE:  / /   REFUND $
APPL:ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED:AC DATE:10/09/
REMARKS:COAL-BARK BOILER.  UTM = 546.213E./ 3394.186N.
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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

№ 33554

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Container Corporation of America (Coal-bark Boiler) Date 9 [illegible]

Address Fernandina Beach Dollars $ 20.00

Applicant Name & Address Same as Above

Source of Revenue

Revenue Code [illegible] Application Number AC 45-35532

By [signature]

Container Corporation of America

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

December 10, 1980

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

Dear Mr. Smallwood:

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

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

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

Sincerely,

CONTAINER CORPORATION OF AMERICA
Fernandina Beach Mill Division

W. M. Kendrick,
Technical Director

/bn

ATTACHMENT #1

TYPICAL OIL ANALYSIS

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

ATTACHMENT #2

ESTIMATED EMISSION RATES

PROCESS	EMISSION CATEGORY	UNCONTROLLED EMISSION (LB/T MATERIAL HANDLING)	TOTAL NUMBER PROCESSES	TYPE CONTROL	EFF. %	UNCONTROLLED EMISSIONS T/YR*	CONTROLLED EMISSIONS T/YR**
CONVEYOR/ TRANSFER	A	.0003	10	NONE	0	0.5	
CONVEYOR/ TRANSFER	B	.0003	10	SURFACTANT SPRAY	73		0.1
CRUSHER	A	.16	1	NONE	0	26.4	
CRUSHER	B	.16	1	SURFACTANT SPRAY	73		7.1
COAL PILE	A	.14	1	NONE	0	23.1	
SILO	B	-	2	ENCLOSED	-		NEG
RAIL CAR UNLOAD	A	.00002	1	NONE	-	.003	
RAIL CAR UNLOAD	B	.00002	1	SURFACTANT SPRAY	73		.001
					TOTAL	50.0 T/YR	7.2 T/YR

A = UNCONTROLLED

B = CONTROLLED

* ASSUMES 330,000 TON ANNUAL COAL THROUGHOUT

** INCLUDES LOAD IN, LOAD OUT, STORAGE PILE MAINTENANCE AND TRAFFIC, AND WIND EROSION.