# Memorandum

# Florida Department of **Environmental Protection**

TO:

Joe Kahn

THRU:

Trina Vielhauer

THRU:

Jeff Koern

FROM:

Bruce Mitchell

DATE:

March 26, 2008

SUBJECT: Smurfit-Stone Container Enterprises, Inc.

Panama City Mill

Final Air Construction Permit 0050009-029-AC/PSD-FL-388A

Attached is the Final Air Construction Permit for the Panama City Mill located at One Everitt Avenue, Panama City, Bay County. The purpose of the permitting action is to revise the sulfur dioxide (SO<sub>2</sub>) emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis pursuant to Condition 2 in Subsection 3C of original Permit PSD-FL-388.

No comments were received during the Public Notice period. Therefore, it is recommended that the Final Air Construction Permit be signed and issued as noticed.

Attachments

JK/tlv/jfk/rbm

### FINAL DETERMINATION

### **PERMITTEE**

Smurfit-Stone Container Enterprises, Inc. One Everitt Avenue Panama City, Florida 32402

### PERMITTING AUTHORITY

Florida Department of Environmental Protection Division of Air Resource Management Bureau of Air Regulation, New Source Review Section 2600 Blair Stone Road, MS #5505 Tallahassee, Florida 32399-2400

### **PROJECT**

Air Permit No. PSD-FL-388A Project No. 0050009-029-AC Panama City Mill

The PSD air construction permit authorizes a revision to the sulfur dioxide emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis pursuant to Condition 2 in Subsection 3C of original Permit PSD-FL-388.

### NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Permit package on February 11, 2008. The applicant published the Public Notice of Intent to Issue in the <u>The News Herald</u> on February 19, 2008. The Department received the proof of publication on February 29, 2008.

### **COMMENTS**

No comments on the Draft Permit were received from the public, the Department's Northeast District Office, the EPA Region 4 Office, the National Park Service, or the applicant.

### CONCLUSION

The final action of the Department is to issue the permit as noticed.

# STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

### **NOTICE OF FINAL PERMIT**

In the Matter of an Application for Permit by:

Smurfit-Stone Container Enterprises, Inc. One Everitt Avenue Panama City, Florida 32402

Authorized Representative:

Mr. B. G. Sammons, General Manager

Air Permit No. PSD-FL-388A Project No. 0050009-029-AC Panama City Mill Nos. 3 and 4 Combination Boiler Modifications Bay County

Enclosed is the final PSD air construction permit, which authorizes a revision to the sulfur dioxide emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis pursuant to Condition 2 in Subsection 3C of original Permit PSD-FL-388. The proposed changes will be conducted at the existing kraft mill, which is located in Bay County at One Everitt Avenue in Panama City, Florida. As noted in the Final Determination, there were no changes made to the permit as drafted. This permit is issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Zuin L Vielhaun

Trina L. Vielhauer, Chief Bureau of Air Regulation

# **CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit and Final Determination) was sent by electronic mail with received receipt requested to the persons listed below.

Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc. (bsammons@smurfit.com)

Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc. (tmclemen@smurfit.com)

Mr. David Buff, Golder Associates (dbuff@golder.com)

Mr. Rick Bradburn, NWD Office (rick.bradburn@dep.state.fl.us)

Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)

Mr. Jim Little, EPA Region 4 (little.james@epa.gov)

Mr. Dee Morse, National Park Service (<u>Dee\_Morse@nps.gov</u>)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby

asknowledged.

(Date)

### SECTION 1. GENERAL INFORMATION

### Nos. 3 and 4 Combination Boilers

### **FACILITY AND PROJECT DESCRIPTION**

The permittee operates an existing Kraft process pulp and paper mill in Panama City. The existing mill is comprised of major activities areas such as: wood handling facility; pulping, bleaching, and chemical recovery; power house operations; paper machines; finishing, shipping, and warehouse operations; and other associated processes and equipment. This project establishes revised 3-hour and 24-hour SO<sub>2</sub> emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis. This project affects the following existing emissions units.

EU No.	Emissions Unit Description
015	No. 3 Combination Boiler
016	No. 4 Combination Boiler

### REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants.
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400 (PSD), F.A.C.

### RELEVANT DOCUMENTS

December 19, 2007 Application and revised SO<sub>2</sub> modeling analysis received.

### **SECTION 2. REVISED PERMIT CONDITIONS**

### Nos. 3 and 4 Combination Boilers

This permitting action revises the following conditions in Subsection 3C of original Permit PSD-FL-388 (Project No. 0050009-028-AC). All other conditions remain unchanged.

This section of the permit addresses the following emissions units.

EU No.	Description
-015	No. 3 Combination Boiler
-016	No. 4 Combination Boiler

### **EQUIPMENT**

1. Enclosure for Recovery Boiler Building: The permittee is authorized to construct an enclosure for the recovery boiler building to reduce corrosion and maintenance. The enclosure will be implemented in two phases. The first phase will add one wall along the east side of the building. The second phase will add a second wall along the south side of the building and may eventually include enclosing the entire building. [Rule 62-212.400(BACT), F.A.C. and Application No. 0050009-028-AC]

### **EMISSIONS STANDARDS**

- 2. New SO<sub>2</sub> Standards: The following new SO<sub>2</sub> emissions standards apply to the Nos. 3 and 4 combination boilers in addition to any existing SO<sub>2</sub> emissions standards.
  - a. SO<sub>2</sub> emissions shall not exceed 1366 lb/hour when only the No. 3 combination boiler is operating based on a 3-hour rolling CEMS average.
  - b. The combined SO<sub>2</sub> emissions from No. 3 and No. 4 combination boilers shall not exceed 1658 lb/hr when both Nos. 3 and 4 are operating and the SO<sub>2</sub> emissions from No. 4 shall not exceed 1183 lb/hr based on 3-hour rolling CEMS averages.
  - c. SO<sub>2</sub> emissions shall not exceed 907 lb/hour when only the No. 3 combination boiler is operating based on a 24-hour rolling CEMS average.
  - d. SO<sub>2</sub> emissions shall not exceed 690 lb/hour when only the No. 4 combination boiler is operating based on a 24-hour rolling CEMS average. [Rule 62-296.340(BART), F.A.C. and 0050009-027-AC]
  - e. When both Nos. 3 and 4 combination boilers are operating, SO<sub>2</sub> emissions from No. 3 shall not exceed 329 lb/hr and the SO<sub>2</sub> emissions from No. 4 shall not exceed 643 lb/hr based on 24-hour rolling CEMS averages.

{Permitting Note: The new enclosure adversely affects dispersion of the existing stack plumes. The new SO<sub>2</sub> emissions standards are based on the revised air quality analysis provided in support of the PSD application.} [Rules 62-212.400(BACT) and 62-296.340(BART), F.A.C.; and Application Nos. 0050009-027-AC, 0050009-028-AC and 0050009-029-AC]



# Florida Department of Environmental Protection

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

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

### **PERMITTEE**

Smurfit-Stone Container Enterprises, Inc. One Everitt Avenue Panama City, Florida 32402

Authorized Representative:

Mr. B. G. Sammons, General Manager

Permit No. PSD-FL-388A Project No. 0050009-029-AC Expires: December 1, 2008 Facility ID No. 0050009 SIC Nos. 2611 and 2621

Nos. 3 and 4 Combination Boilers

### **FACILITY AND LOCATION**

This permit establishes revised sulfur dioxide (SO<sub>2</sub>) emissions standards for the Nos. 3 and 4 Combination Boilers based on a corrected air quality modeling analysis pursuant to Condition 2 in Subsection 3C of original Permit PSD-FL-388. The existing Panama City mill is classified as a major stationary source, a Title V facility and major source of hazardous air pollutants (HAP). The facility is a Kraft process pulp and paper mill consisting of the following major activities: wood handling facility; pulping, bleaching, and chemical recovery; power house operations; paper machines; finishing, shipping, and warehouse operations; and other associated processes and equipment. The UTM coordinates are Zone 16, 632.8 km East, and 3335.1 km North.

### STATEMENT OF BASIS

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

### **CONTENTS**

Section 1. General Information

Section 2. Revised Permit Conditions

Executed in Tallahassee, Florida.

Joseph Kahn, Director

Division of Air Resource Management

From:

Harvey, Mary

Sent:

Tuesday, April 01, 2008 3:13 PM

To:

'Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc.'; 'Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc.'; 'David Buff, P.E. of Record, Golder Associates, Inc.'; Bradburn, Rick;

'Katy Forney, EPA Region 4'; 'Jim Little, EPA Region 4'; 'Dee Morse, NPS'

Cc:

Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria

Subject:

FINAL PERMIT #0050009-029-AC/PSD-FL-388A

Attachments: Document - 0050009-029-AC- FINAL.pdf

Tracking:

Recipient

Delivery

Read

'Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc.'

'Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc.'

'David Buff, P.E. of Record, Golder Associates, Inc.'

Bradburn, Rick

Delivered: 4/1/2008 3:13 PM Read: 4/2/2008 8:34 AM

'Katy Forney, EPA Region 4' 'Jim Little, EPA Region 4' 'Dee Morse, NPS'

Mitchell, Bruce

Delivered: 4/1/2008 3:13 PM

Walker, Elizabeth (AIR)

Delivered: 4/1/2008 3:13 PM

Gibson, Victoria

Delivered: 4/1/2008 3:13 PM Read: 4/1/2008 3:19 PM

### Dear Sir/Madam:

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

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

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

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

Thank you,

DEP, Bureau of Air Regulation

From: Sent:

To:

Subject:

Dee\_Morse@nps.gov Tuesday, April 01, 2008 6:30 PM Harvey, Mary FINAL PERMIT #0050009-029-AC/PSD-FL-388A

# Return Receipt

Your

FINAL PERMIT #0050009-029-AC/PSD-FL-388A

document:

was

Dee Morse/DENVER/NPS

received

by:

at:

04/01/2008 04:29:15 PM

From: To:

Bradburn, Rick

Harvey, Mary

Sent:

Wednesday, April 02, 2008 8:34 AM

Subject:

Read: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

### Your message

To:

'Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc.'; 'Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc.';

'David Buff, P.E. of Record, Golder Associates, Inc.'; Bradburn, Rick; 'Katy Forney, EPA Region 4'; 'Jim Little, EPA Region 4'; 'Dee

Morse, NPS'

Cc:

Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria

Subject: Sent:

FINAL PERMIT #0050009-029-AC/PSD-FL-388A 4/1/2008 3:13 PM

was read on 4/2/2008 8:34 AM.

From: To: Gibson, Victoria Harvey, Mary

Sent:

Tuesday, April 01, 2008 3:19 PM

Subject:

Read: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

### Your message

To:

'Mr. B. G. Sammons, Smurfit-Stone Container Enterprises, Inc.'; 'Mr. Tom Clements, Smurfit-Stone Container Enterprises, Inc.';

'David Buff, P.E. of Record, Golder Associates, Inc.'; Bradburn, Rick; 'Katy Forney, EPA Region 4'; 'Jim Little, EPA Region 4'; 'Dee

Morse, NPS'

Cc:

Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria

Subject:

FINAL PERMIT #0050009-029-AC/PSD-FL-388A

Sent:

4/1/2008 3:13 PM

was read on 4/1/2008 3:19 PM.

From:

To:

Sent: Subject: Buff, Dave [DBuff@GOLDER.com] undisclosed-recipients Tuesday, April 01, 2008 3:42 PM Read: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

Your message

To:

DBuff@GOLDER.com

Subject:

was read on 4/1/2008 3:42 PM.

From: Sammons, Bob [BSAMMONS@SMURFIT.COM]

**Sent:** Tuesday, April 01, 2008 3:42 PM

To: Harvey, Mary

Subject: RE: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]

**Sent:** Tuesday, April 01, 2008 2:13 PM

To: Sammons, Bob; Clements, Tom; David Buff, P.E. of Record, Golder Associates, Inc.; Bradburn, Rick; Katy

Forney, EPA Region 4; Jim Little, EPA Region 4; Dee Morse, NPS Cc: Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria Subject: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

### Dear Sir/Madam:

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

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

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

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

Thank you,

DEP, Bureau of Air Regulation

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

From:

Sammons, Bob [BSAMMONS@SMURFIT.COM]

To:

Sent:

Subject:

Harvey, Mary
Tuesday, April 01, 2008 3:41 PM
Read: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

Your message

To:

BSAMMONS@SMURFIT.COM

Subject:

was read on 4/1/2008 3:41 PM.

From: Clements, Tom [TMCLEMEN@SMURFIT.COM]

**Sent:** Tuesday, April 01, 2008 3:20 PM

To: Harvey, Mary
Cc: Sammons, Bob

Subject: RE: FINAL PERMIT #0050009-029-AC/PSD-FL-388A

Message received, thank you

**Tom Clements** 

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]

**Sent:** Tuesday, April 01, 2008 2:13 PM

To: Sammons, Bob; Clements, Tom; David Buff, P.E. of Record, Golder Associates, Inc.; Bradburn, Rick; Katy

Forney, EPA Region 4; Jim Little, EPA Region 4; Dee Morse, NPS **Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria **Subject:** FINAL PERMIT #0050009-029-AC/PSD-FL-388A

### Dear Sir/Madam:

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

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

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

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

Thank you,

DEP, Bureau of Air Regulation

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