



# Department of Environmental Protection

Lawton Chiles  
Governor

Northwest District  
160 Governmental Center  
Pensacola, Florida 32501-5794

Virginia B. Wetherell  
Secretary

DECEMBER 14, 1995

**RECEIVED**

DEC 18 1995

BUREAU OF  
AIR REGULATION

H. James Spahr  
Environmental Engineer  
Champion International Corp.  
Post Office Box 87  
Cantonment, Florida 32533-0087

Dear Mr. Spahr:

This is a response to your 12/11 letter requesting two minor changes to Permit Number AC17-223343 that was issued by the Department to cover the construction of a steam generating power boiler and a lime kiln/mud dryer system.

Your first request was that the fuels specified for the lime kiln/mud dryer system be changed to include a No. 4 recycled fuel oil that is currently being used to fire the recovery boilers and the lime calciner. It is our understanding that fuel oil is only used as a back-up fuel for natural gas in case there is a natural gas curtailment due to adverse weather conditions. Also, your letter stipulated that the No. 4 fuel oil blend contains some on-spec recycled oil.

Your second request relates to the concern that the permit contains references for two averaging periods for determining compliance with nitrogen oxides (NO<sub>x</sub>) standards. Your request was that you be permitted to meet only the requirements of the more stringent averaging period in order to simplify record keeping. This would eliminate the calculating of a 30-day rolling average and require that you maintain only the more stringent 24-hour average of hourly NO<sub>x</sub> levels.

Your requests are reasonable and are granted. The use of No. 4 fuel oil would essentially replace No. 6 fuel oil as specified by the permit and would be expected to reduce emissions to the atmosphere. In addition, it has been the Department's position to encourage the proper use of recycled on-spec fuel oil. In the interest of paperwork reduction it is also the Department's position to eliminate redundant record keeping.

All other specific conditions of this permit remain unchanged.

This letter shall be attached to and made a part of Permit Number AC 17-223343.

Sincerely,

Ed K. Middleswart, P.E.  
Air Program Administrator

EKM:emc

cc: Clair Fancy, DEP Division of Air Resources Management



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

December 7, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. H. James Spahr  
Environmental Engineer  
Champion International Corporation  
Post Office Box 87  
Cantonment, Florida 32533 - 0087

Dear Mr. Spahr:

RE: Extension of Permit No. AC 17-223343 (PSD-FL-200)

This letter is in response to your November 21, 1995, request for extension of the referenced permit.

Rule 62-213.420(1)(a)4, Florida Administrative Code (as revised on October 11, 1995), extends the expiration date of all air construction permits for Title V sources that expire between September 1, 1995, and November 1, 1996. The expiration date of the referenced permit is extended to June 15, 1996, by this rule. No other action is required by the Department or the permittee to extend this construction permit.

If you have any questions on this matter, please call Willard Hanks at (904) 488-1344.

Sincerely,

A. A. Linero  
Administrator  
New Source Review Section

CF/wh/t

cc: E. Middleswart, NWD

SEND TO: [Illegible]

1. Write your name and address on the reverse of this form so that we can return this card to you.

2. Attach this form to the front of the envelope, or on the back if space does not permit.

3. Write "Return Receipt Requested" on the mail piece below the article number. The Return Receipt will show to whom the article was delivered and the date delivered.

4. Article Addressed to:  
*Caruso Spahn Inc*  
*Champion Int'l Corp*  
*PO Box 87*  
*Canterment, FL*  
*32533-0087*

4a. Article Number  
*2 127 632 588*

4b. Service Type  
 Registered  
 Insured  
 Express Mail  
 COD  
 Return Receipt for Merchandise

7. Date of Delivery  
*DEC 7 1995*

8. Addressee's Address (Only if requested and fees paid)

PS Form 3800, Post Office, 1991. U.S. and Foreign Postage Guaranteed. **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service

2 127 632 588

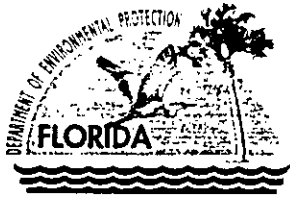


**Receipt for Certified Mail**

No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

Sent to <i>Caruso Spahn</i>	
Street and No. <i>Champion Int'l</i>	
P.O., State and ZIP Code <i>Canterment FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>12-7-95</i>
<i>AC 17-223343</i>	
<i>PSD-FI-200</i>	

PS Form 3800, March 1993



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

December 7, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. H. James Spahr  
Environmental Engineer  
Champion International Corporation  
Post Office Box 87  
Cantonment, Florida 32533 - 0087

Dear Mr. Spahr:

RE: Modification of Permit No. AC 17-223343, PSD-FL-200  
Kiln-Mud Dryer/No. 6 Power Boiler

The Department acknowledges receipt of your November 21 letter withdrawing the request to modify the referenced permits. This withdrawal is accepted and the Department has ceased processing this request. Should Champion International Corporation choose to burn No. 4 fuel oil in the kiln-mud dryer or chose to report the nitrogen oxides emissions in a different manner than is required by the referenced permits, a new request for modification will need to be submitted to this office.

If you have any questions on this matter, please call Willard Hanks at (904) 488-1344.

Sincerely,

A. A. Linerc  
Administrator  
New Source Review Section

CHF/wh/t

cc: E. Middleswart, NWD  
J. Harper, EPA  
J. Bunyak, NPS

Fold at line over top of envelope

**SENDER:**  
 • Complete items 1 and/or 2 for additional services.  
 • Complete items 3 and 4a & b.  
 • Print your name and address on the reverse of this form so that we can return this card to you.  
 • Attach this form to the front of the mailpiece, or on the back if space does not permit.  
 • Write "Return Receipt Requested" on the mailpiece below the article number.  
 • The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):  
 1.  Addressee's Address  
 2.  Restricted Delivery  
 Consult postmaster for fee.

3. Article Addressed to:  
 H James Spahr, Inc  
 Champion Int'l Corp  
 PO Box 87  
 Cantonment, FL 32533-2837

4a. Article Number: 2 127 6321 589

4b. Service Type:  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

Date of Delivery: 12-7-95

5. Signature (Addressee):  
 J. Spahr

6. Signature (Agent):  
 A. Retalla

PS Form 3811, December 1991 U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service

2 127 632 589



**Receipt for Certified Mail**

No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

PS Form 3800, March 1993

Sent to	H James Spahr
Street and	Champion Int'l
P.O. Number and ZIP Code	Cantonment, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	12-7-95
	AC 17-223343
	PSO-FL-200

Printing and Writing Papers  
375 Muscogee Road  
P.O. Box 87  
Cantonment, Florida 32533-0087  
904 968-2121

**RECEIVED**

NOV 29 1995

BUREAU OF  
AIR REGULATION

*Chair*  
*11/27*  
*AL*  
*pls handle*  
*Chair*



November 21, 1995

*Willard*

Howard Rhodes  
Director, Division of Air Programs  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Mr. Rhodes:

Champion International Corporation's Pensacola Mill is currently undertaking a major mill modification project as a part of the mill's Wastewater Consent Order. This project is permitted under air construction permit AC 17-223343, PSD-FL-200. The expiration date of this permit is December 31, 1995. Champion anticipates that this project will not reach completion by December 31, 1995.

Champion requests an extension of the expiration date for permit AC 17-223343, PSD-FL-200 to coincide with the date of submittal for the Pensacola Mill's Title V Permit Application. At that time the Pensacola Mill will be required to comply with the conditions specified in the Title V Permit Application. Until that time the mill would continue to operate within the conditions specified in the air construction permit, AC 17-223343, PSD-FL-200. This would preclude the need to write an interim air operating permit for the affected sources for the time period between the expiration date of the air construction permit and submission of the Title V Permit Application.

In order to comply with specific condition F.7. of the air construction permit, Champion will submit certification of construction completion and the required compliance test reports. Submission of a Title V Permit Application would constitute proper application for an operation permit.

Champion believes this arrangement will simplify the transition process from air construction permit to air operating permit for the affected sources. Your timely response to this request is appreciated. If you have any questions or concerns please contact me at (904) 968-2121 x3833.

Sincerely

H. James Spahr  
Environmental Engineer

**RECEIVED**  
NOV 27 1995  
DIVISION OF AIR  
RESOURCES MANAGEMENT

Printing and Writing Papers  
375 Muscogee Road  
P.O. Box 87  
Cantonment, Florida 32533-0087  
904 968-2121

**RECEIVED**

NOV 28 1995

BUREAU OF  
AIR REGULATION



November 21, 1995

Howard Rhodes  
Director, Division of Air Programs  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Notice of Intent to Issue Permit Amendment, Permit No. AC 17-223343, PSD-FL-200, Lime  
Kiln/Mud Dryer & No. 6 Power Boiler

Dear Mr. Rhodes:

With this letter, Champion International Corporation withdraws its request for modifications to Air Construction Permit No. AC 17-223343, PSD-FL-200 as requested in separate letters dated June 13, 1995 and June 27, 1995 and as proposed by FDEP in the Notice of Intent to Issue dated 8/29/95.

If you have any questions or comments please contact me at (904) 968-2121 x3833. Thank you for your timely response to this action.

Sincerely,

A handwritten signature in cursive script that reads "H. James Spahr".

H. James Spahr  
Environmental Engineer

Cc: Joe Deschenc  
Phil Ferguson  
Kyle Moore  
Janet Price  
Willie Tims  
Steve Webb  
E00.D01  
E09.E23

**RECEIVED**

NOV 27 1995

DIVISION OF AIR  
RESOURCES MANAGEMENT

*Willard*

*Chair  
11/27*

*11/28 AL  
pls note they  
have withdrawn  
request. Need we said  
needs public notice  
Class*



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

August 25, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. H. James Spahr, Environmental Engineer  
Champion International Corporation  
Post Office Box 87  
Cantonment, Florida 32533

Dear Mr. Spahr:

Re: Modification of Permit No. AC 17-223343, PSD-FL-200  
Kiln-Mud, Dryer/No. 6 Power Boiler

Enclosed is an Intent to Issue, a public notice for the modification of the referenced permits, and a draft of the letter modifying the permit's continuous emissions monitoring requirement and authorizing the burning of No. 4 fuel oil (containing on-spec used oil) in the kiln-mud dryer at your Kraft pulp mill located in Cantonment, Escambia County, Florida.

You must publish the Public Notice one time in a newspaper having circulation in Escambia County. The approval of the modification of this permit is contingent on the resolution of any response to the public notice by persons whose substantial interest are affected by the proposed changes.

If you have any questions, please call Willard Hanks at (904) 488-1344 or send your written comments to Mr. A. A. Linero, P.E., at the above address.

Sincerely,

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

CHF/wh/t

Enclosure

cc: E. Middleswart, NWD  
J. Harper, EPA  
J. Bunyak, NPS



**SENDER:**  
 • Complete items 1 and/or 2 for additional services.  
 • Complete items 3 and 4a & b.  
 • Print your name and address on the reverse of this form so that we can return this card to you.  
 • Attach this form to the front of the mailpiece, or on the back if space does not permit.  
 • Write "Return Receipt Requested" on the mailpiece below the article number. The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):  
 1.  Addressee's Address  
 2.  Restricted Delivery  
 Consult postmaster for fee.

3. Article Addressed to:  
 Mr. H. James Spahn, EE  
 Champion Int'l Corp  
 P.O. Box 87  
 Cantonment, FL  
 32533

4a. Article Number:  
 Z 392 979 036

4b. Service Type:  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery:  
 8-31-95

5. Signature (Addressee):  
 Pat Duon

6. Signature (Agent):  
 Champion

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 U.S. GPO: 1993-352-714 DOMESTIC RETURN RECEIPT

Is your RETURN ADDRESS completed on the reverse side? Thank you for using Return Receipt Service

Z 392 979 036



**Receipt for Certified Mail**

No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

PS Form 3800, March 1993

Sent to	H. James Spahn
Street and No.	Champion Int'l
P.O., State and ZIP Code	Cantonment, FL
Postage	\$
Certified Fee	
Social Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	8-29-95
	AC17-223343
	PSD-FL-200

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an  
Application for Permit Amendment

DEP File Nos. AC17-223343  
PSD-FL-200  
Escambia County

Mr. H. James Spahr, Environmental Engineer  
Champion International Corporation  
Post Office Box 87  
Cantonment, Florida 32533-0087

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INTENT TO ISSUE

The Department of Environmental Protection gives notice of its intent to issue a construction permit modification (copy attached) for the proposed project as detailed in the application/request specified above and for the reasons stated below.

The applicant, Champion International Corporation, applied on June 13 and June 23, 1995, to the Department of Environmental Protection for a modification to their air construction permit for the Kraft pulp mill located in Cantonment, Escambia County, Florida. The modification will specify that the nitrogen oxides continuous emissions monitoring data is to be reported on an 24-hour average basis instead of a 30-day rolling average and authorize the burning of No. 4 fuel oil (containing on-spec used oil) in the lime mud dryer.

The modification is not subject to the Prevention of Significant Deterioration (PSD) Review and does not require a Best Available Control Technology (BACT) determination.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a permit amendment is required for the proposed change.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit Amendment. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of

general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment.

The Department will issue the permit amendment with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;


- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's

final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399  
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **INTENT TO ISSUE PERMIT MODIFICATION** all copies were mailed by certified mail before the close of business on 8-29-95 to the listed persons.

Clerk Stamp  
**FILING AND ACKNOWLEDGMENT**  
FILED, on this date, pursuant to  
§120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

  
Clerk

8-29-95  
Date

Copies furnished to:

E. Middleswart, NWD  
J. Harper, EPA  
J. Bunyak, NPS

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT

PSD-FL-200  
AC17-223343

The Department of Environmental Protection gives notice of its intent to issue a modification for construction permit Nos. AC17-223343 and PSD-FL-200 to Champion International Corporation for their Kraft pulp mill located in Cantonment, Escambia County, Florida. The modification will specify that the nitrogen oxides continuous emissions monitoring data for the No. 6 Power Boiler is to be reported on a 24-hour average basis instead of a 30-day rolling average and that No. 4 fuel oil (containing on-spec used oil) may be burned in the kiln- mud dryer.

The modification is not subject to the Prevention of Significant Deterioration (PSD) regulation which would require a Best Available Control Technology (BACT) determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Department of Environmental Protection  
Northeast District  
160 Governmental Center  
Pensacola, Florida 32501-5794

Any person may send written comments on the proposed action to Administrator, New Source Review Section, at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

September XX, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. H. James Spahr, Environmental Engineer  
Champion International Corporation  
Post Office Box 87  
Cantonment, Florida 32533-0087

Dear Mr. Spahr:

Re: Modification of Permit No. AC 17-223343, PSD-FL-200  
Kiln-Mud Dryer/No. 6 Power Boiler

The Department has reviewed your June 27 letter requesting a modification to the referenced permit for the nitrogen oxides testing and reporting requirements for the No. 6 power boiler and Mr. Steve Webb's June 13 letter requesting a modification for the fuel limitations for the kiln mud dryer. The request is to allow the nitrogen oxides continuous emissions monitoring data to be reported on a 24-hour average basis instead of a 30-day rolling average and to authorize the burning of No. 4 fuel oil (containing on-spec used oil) in the lime mud dryer.

The Department has reasonable assurance that the No. 6 Power Boiler is in compliance with the new source performance standard NOx emissions limitation of 0.10 lbs/MMBtu, 30-day rolling average, if it is continuously meeting the Department's Best Available Control Technology (BACT) standard of 0.06 lbs/MMBtu, 24-hour average. Burning No. 4 fuel oil containing on-specification used oil with a maximum of 1.0 percent sulfur by weight and less than 2 ppm polychlorobiphenyls (PCB), provided all restrictions in Chapter 62-210, F.A.C., and 40 CFR 279 are met, will be in compliance with the state regulations. Additional permit conditions are required to confirm compliance with these requirements.

The permit is modified as follows:

From

A. No. 6 Power Boiler (PB)

8. Any required compliance testing shall be conducted using the following test methods in accordance with F.A.C. Rule 17-297 and 40 CFR 60, Subpart Db and Appendix A (July, 1991 version):

Mr. H. James Spahr  
September XX, 1995  
Page Two

- a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources.
- b) EPA Method 7D or 7E, for Determining Nitrogen Oxide Concentrations at Fossil Fuel Fired Steam Generators.
- c) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources.
- d) EPA Method 10, Determination of Carbon Monoxide Emissions from Stationary Sources.
- e) EPA Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.
- f) Upon initial start-up, testing shall be conducted for NOx, CO, VOC, and VE.

Note: Other reference methods may be used with prior written approval received from the Department in accordance with F.A.C. Rule 17-297.620.

9. Emission monitoring for nitrogen oxides shall be in accordance with 40 CFR 60.48b (July 1991 version).
10. Reporting and recordkeeping requirements shall be in accordance with 40 CFR 60.46b (July 1991 version).

B. Lime Kiln - Mud Dryer System (LK-MDS)

1. Operation permit No. A017-181738 is incorporated by reference except for the following changes and/or additions.
  - a. the LK-MDS may operate continuously (i.e., 8760 hrs/yr);
  - b. a new lime mud drier system will be constructed as an addition to the existing lime kiln operation;
  - c. the pollutant emissions from the LK-MDS will be vented to a new electrostatic precipitator, which will be vented in series to a modified packed column wet scrubber using NaOH as the scrubbing media;
  - d. after construction/modification is completed Champion will develop a testing protocol which includes a proposed test schedule to establish scrubber operating parameters and monitoring methods to meet the applicable SO<sub>2</sub> and TRS limits for the LK-MDS.
  - e. the test protocol will be submitted to the Department's Northwest District office prior to conducting the test program; and,



- f. the maximum allowable operating rate of lime product (90% CaO) will be increased from 13.67 to 20.83 tons per hours.
- g. the pollutant emissions from the LK-MDS shall not exceed:

NOx*	No. 6 fuel oil: 200 ppmvd @ 10% O <sub>2</sub> (49.3 lbs/hr, 215.9 TPY)
	Natural gas: 175 ppmvd @ 10% O <sub>2</sub> (43.1 lbs/hr, 188.8 TPY)
PM/PM <sub>10</sub>	10.9 lbs/hr, 47.7 TPY
CO*	45 ppmvd @ 10% O <sub>2</sub> (6.75 lbs/hr, 29.6 TPY)
VOC*	104 ppmvd @ 10% O <sub>2</sub> (as propane) (24.5 lbs/hr, 107.3 TPY)
TRS**	8 ppmvd @ 10% O <sub>2</sub> (1.46 lbs/hr, 6.4 TPY)
SO <sub>2</sub>	6.49 lbs/hr, 28.4 TPY
VE	< 20% opacity

\* 24-hour average

\*\* 12-hour average

Note: o Maximum of 500 tons/day lime product (90% CaO);  
o Maximum sulfur content of the No. 6 Fuel Oil is 1.0%, by weight; and  
o Concentration limits and allowable pound per hour emission rates are based on a maximum design volumetric flowrate of 34,383 dscfm

- h. while firing No. 6 fuel oil, initial and subsequent annual compliance tests shall be conducted using the following test methods in accordance with F.A.C. Rule 17-297 and 40 CFR 60, Appendix A (July, 1991 version).
- 1) EPA Method 5, Determination of Particulate Emissions from Stationary Sources.
  - 2) EPA Method 7D or 7E, for Determining Nitrogen Oxide Concentrations at Fossil Fuel Fired Steam Generators.
  - 3) EPA Method 8, Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources; or, EPA Method 6C Determination of Sulfur Dioxide Emissions from Stationary Sources, may be used;
  - 4) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources.
  - 5) EPA Method 10, Determination of Carbon Monoxide Emissions from Stationary Sources.
  - 6) EPA Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

Mr. H. James Spahr  
September XX, 1995  
Page Four

Note: Other reference methods may be used with prior written approval received from the Department in accordance with F.A.C. Rule 17-297.620.

- i. while firing natural gas, initial and subsequent compliance tests shall be conducted using the following test methods in accordance with F.A.C. Rule 17-297 and 40 CFR 60, Appendix A (July, 1991 version):
  - 1) EPA Method 5, Determination of Particulate Emissions from Stationary Sources.
  - 2) EPA Method 7D or 7E, for Determining Nitrogen Oxide Concentrations at Fossil Fuel Fired Steam Generators.
  - 3) EPA Method 8, Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources; or, EPA Method 6C Determination of Sulfur Dioxide Emissions from Stationary Sources, may be used;
  - 4) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources.
  - 5) EPA Method 10, Determination of Carbon Monoxide Emissions from Stationary Sources.
  - 6) EPA Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

Note: Other reference methods may be used with prior written approval received from the Department in accordance with F.A.C. Rule 17-297.620.

TC

A. No. 6 Power Boiler (PB)

8. **Except as noted in Specific Condition No. 9, any required compliance testing and continuous emissions monitor quality assurance and certification testing required pursuant to 40 CFR 60, Appendix F, shall be conducted using the following test methods in accordance with F.A.C. Rule 62-297 and 40 CFR 60, Subpart Db and Appendix A (July, 1991 version):**

- a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources.
- b) EPA Method 7, 7A, or 7E for Determining Nitrogen Oxide Concentrations at Fossil Fuel Fired Steam Generators.
- c) EPA Method 9, visual Determination of the Opacity of Emissions from Stationary Sources.
- d) EPA Method 10, Determination of Carbon Monoxide Emissions from Stationary Sources.

Mr. H. James Spahr  
September XX, 1995  
Page Five

- e) EPA Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.
- f) Upon initial start-up, testing shall be conducted for NOx, CO, VOC, and VE.

Note: Other reference methods may be used with prior written approval received from the Department in accordance with F.A.C. Rule 62-297.620.

9. Emission compliance and monitoring determination for nitrogen oxides shall be in accordance with 40 CFR 60.46b(e) (continuous emission monitor data used to determine compliance with the NOx standard) and 40 CFR 60.48b (July 1991 version) except that emissions compliance/exceedances shall be based on a 24-hour time period. Demonstrating compliance with the NOx standard of 0.06 lbs/MMBtu, 24-hour averaging, precludes the need to show compliance with the new source performance standard of 0.10 lbs/MMBtu, 30-day rolling average.

10. Reporting and recordkeeping requirements shall be in accordance with 40 CFR 60.49b (July 1991 version) except that emissions/exceedances shall be based on a 24-hour time period. The 24-hour average nitrogen oxides emission rates (lbs/MMBtu) shall be calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rate for the preceding 24-hour. The steam generating unit operating days when the calculated 24-hour average nitrogen oxides emission rate exceeded 0.06 lbs/MMBtu shall be identified and the reason for the excess emissions as well as the corrective action taken shall be reported to the Department Northwest District office.

B. Lime Kiln - Mud Dryer System (LK-MDS)

- 1. Operation permit No. A017-181738 is incorporated by reference except for the following changes and/or additions.
  - a. the LK-MDS may operate continuously (i.e., 8760 hrs/yr);
  - b. a new lime mud drier system will be constructed as an addition to the existing lime kiln operation;
  - c. the pollutant emissions from the LK-MDS will be vented to a new electrostatic precipitator, which will be vented in series to a modified packed column wet scrubber using NaOH as the scrubbing media;

- d. after construction/modification is completed Champion will develop a testing protocol which includes a proposed test schedule to establish scrubber operating parameters and monitoring methods to meet the applicable SO<sub>2</sub> and TRS limits for the LK-MDS.
- e. the test protocol will be submitted to the Department's Northwest District office prior to conducting the test program; and,
- f. the maximum allowable operating rate of lime product (90% CaO) will be increased from 13.67 to 20.83 tons per hours.
- g. the pollutant emissions from the LK-MDS shall not exceed:

NOx*	No. 4 & 6 fuel oils: 200 ppmvd @ 10% O <sub>2</sub> (49.3 lbs/hr, 215.9 TPY)
	Natural gas: 175 ppmvd @ 10% O <sub>2</sub> (43.1 lbs/hr, 188.8 TPY)
PM/PM <sub>10</sub>	10.9 lbs/hr, 47.7 TPY
CO*	45 ppmvd @ 10% O <sub>2</sub> (6.75 lbs/hr, 29.6 TPY)
VOC*	104 ppmvd @ 10% O <sub>2</sub> (as propane) (24.5 lbs/hr, 107.3 TPY)
TRS**	8 ppmvd @ 10% O <sub>2</sub> (1.46 lbs/hr, 6.4 TPY)
SO <sub>2</sub>	6.49 lbs/hr, 28.4 TPY
VE	< 20% opacity

- \* 24-hour average
- \*\* 12-hour average

Note: o Maximum of 500 tons/day lime product (90% CaO);  
o Maximum sulfur content of the Nos. 4 & 6 Fuel Oils are 1.0%, by weight; and  
o Concentration limits and allowable pound per hour emission rates are based on a maximum design volumetric flowrate of 34,383 dscfm

- h. while firing fuel oil, initial and subsequent annual compliance tests shall be conducted using the following test methods in accordance with F.A.C. Rule 62-297 and 40 CFR 60, Appendix A (July 1991 version).
  - 1) EPA Method 5, Determination of Particulate Emissions from Stationary Sources.
  - 2) EPA Method 7D or 7E, for Determining Nitrogen Oxide Concentrations at Fossil Fuel Fired Steam Generators.

Mr. H. James Spahr  
September XX, 1995  
Page Seven

- 3) EPA Method 8, Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources; or, EPA Method 6C Determination of Sulfur Dioxide Emissions from Stationary Sources, may be used;
- 4) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources.
- 5) EPA Method 10, Determination of Carbon Monoxide Emissions from Stationary Sources.
- 6) EPA Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

Note: Other reference methods may be used with prior written approval received from the Department in accordance with F.A.C. Rule 62-297.620.

i. while firing natural gas, initial and subsequent compliance tests shall be conducted using the following test methods in accordance with F.A.C. Rule 17-297 and 40 CFR 60, Appendix A (July, 1991 version):

- 1) EPA Method 5, Determination of Particulate Emissions from Stationary Sources.
- 2) EPA Method 7D or 7E, for Determining Nitrogen Oxide Concentrations at Fossil Fuel Fired Steam Generators.
- 3) EPA Method 8, Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources; or, EPA Method 6C Determination of Sulfur Dioxide Emissions from Stationary Sources, may be used;
- 4) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources.
- 5) EPA Method 10, Determination of Carbon Monoxide Emissions from Stationary Sources.
- 6) EPA Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

Note: Other reference methods may be used with prior written approval received from the Department in accordance with F.A.C. Rule 62-297.620.

j. In order to be considered on-specification, the used oil shall meet the following specifications [40 CFR 279, Subpart B]:

- 1) Arsenic shall not exceed 5.0 ppm;
- 2) Cadmium shall not exceed 2.0 ppm;
- 3) Chromium shall not exceed 10.0 ppm
- 4) Lead shall not exceed 100.0 ppm;
- 5) Total halogens shall not exceed 1,000 ppm;
- 6) Flash point shall not be less than 100.0 degrees F

Off-site generated used oil shall meet the above specifications prior to deliver to the facility.

k. Used oil containing a PCB concentration of 2 or more ppm shall not be burned in this source. Used oil shall not be blended to meet this requirement. On-specification used oil with a PCB concentration of less than 2 ppm shall be burned only at normal source operating temperatures; it shall not be burned during periods of startup or shutdown.

Prior to burning used oil with a PCB concentration of less than 2 ppm, provide the marketer with a one time written notice certifying that the used oil will be burned in a qualified combustion device (40 CFR 279.61 and 40 CFR 260.10).  
[40 CFR 761 Subparts A, B, and D]

1. In order to document compliance with the above requirements:

1) Each batch of used oil to be burned shall be sampled and analyzed\* for the following:

<u>Constituent/Property</u>	<u>Unit</u>	<u>Test Method</u>
Cadmium	ppm	EPA SW-846 (3040-7130)
Arsenic	ppm	EPA SW-846 (3050-7061)
Chromium	ppm	EPA SW-846 (3040-7190)
Lead	ppm	EPA SW-846 (3040-7420)
Total Halogens	ppm	ASTM E442
PCB**	ppm	EPA SW-846 (3665-8080)
Sulfur	%	ASTM D129-64, D1552-83, D2622-87 or D1266-87
Flash Point	°F	ASTM D93
Heat of Combustion	Btu/gal	D287
Density	lbs/gal	

\*Certified analytical results from the fuel oil supplier or sampling/analysis by the permittee.

\*\*A claim that used oil does not contain quantifiable levels (2 ppm or greater) or PCBs must be documented by analysis or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal or special knowledge of the source and composition of the used oil or a certification from the person generating the used oil claiming that the oil contains no detectable PCBs.

Mr. H. James Spahr  
September XX, 1995  
Page Nine

A copy of this letter shall be attached to the referenced air construction permit and shall become a part of that permit.

Sincerely,

Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/wh/t

Enclosure: Champion letters dated June 13, 1995  
and June 27, 1995

cc: E. Middleswart, NWD  
J. Harper, EPA  
J. Bunyak, NPS

Printing and Writing Papers  
375 Muscogee Road  
P.O. Box 87  
Cantonment, Florida 32533-0087  
904 968-7171



H. James Spahr  
Champion International Corp.  
PO Box 87  
Cantonment, FL 32533-0087

June 27, 1995

Mr. Clair Fancy, P.E.  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

A new gas fired, steam generating power boiler, the # 6 Power Boiler, has been constructed at Champion International Corporation's Pensacola Mill as part of the consent order project. This boiler is permitted under permit number AC 17-223343, PSD-FL-200. Construction of this boiler commenced on 27 March 1995. Initial startup of the boiler was on 16 June 1995.

We have a concern about the compliance and performance test methods and emission monitoring requirements for NO<sub>x</sub> for this boiler. Specific condition A.5. of the construction permit states:

"The No.6 PB is subject to all applicable standards of 40 CFR 60, Subpart Db"

Within this subpart §60.46b(e)(1) states:

"For the initial compliance test, nitrogen oxides from the steam generating unit are monitored for 30 successive steam generating unit operating days and the 30-day average emission rate is used to determine compliance with the nitrogen oxides emission standards under §60.44b. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period"

Also within this subpart, §60.49b(g)(3) and (g)(4) state:

"Except as provided under paragraph (p) of this section, the owner or operator of an affected facility subject to the nitrogen oxides standards under §60.44b shall maintain records of the following information for each steam generating unit operating day...

...The 30-day average nitrogen oxides emission rates (ng/l) or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days" and

"Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under §60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken..."

The NO<sub>x</sub> emission standard under §60.44b(a) for this boiler is 0.1 lb./MMBtu and §60.44b(i) states:



"...compliance with the emission limits under this section is determined on a 30-day rolling average basis."

However, Specific Condition A.7. of the construction permit states:

"The No. 6 PB's pollutant emissions shall not exceed:

NO<sub>x</sub>\* 0.06 lb/MMBtu...

...\* 24-hour average"

This limit is based on a BACT determination and is more stringent both in emission rate and averaging period than the subpart D<sub>1</sub> limits. Therefore we request that we be permitted to use a 24 hour average emission rate calculated as the average of all hourly emissions data recorded by the monitoring system during the 24 hour test period for our initial performance test in lieu of the requirements under §60.46b(e)(1). We also request that we be permitted to maintain records of:

the 24 hour average nitrogen oxides emission rates (ng/l or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 24 hours and

identification of the steam generating unit operating days when the calculated 24 hour average nitrogen oxides emission rates are in excess of 0.06 lb/MMBtu, with the reasons for such excess emissions as well as a description of corrective actions taken.

in lieu of the requirements of §60.49b(g)(3) and (g)(4).

If you have any questions or comments concerning these requests please contact me. The deadline for performance testing for this boiler is not far off so a timely response to this request would be greatly appreciated. Thank you.

Sincerely,

H. James Spahr  
Environmental Engineer

Cc: Charles Ayer  
Kyle Moore  
Willie Tims  
Steve Webb  
E09.E24

Printing and Writing Papers  
375 Muscogee Road  
P.O. Box 57  
Cantonment, Florida 32536-0057  
904 966-2121



RECEIVED

JUN 19 1995

Bureau of  
Air Regulation

Mr. Bruce Mitchell  
State of Florida  
Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

June 13, 1995

Mr. Mitchell,

By this letter, Champion International would like to request a minor change affecting the lime kiln-mud dryer system being constructed under permit AC17-223343.

In part B of the specific conditions, items g and h refer to the firing of No. 6 fuel oil. We would like to expand this to include No. 4 fuel oil. The No. 4 fuel oil is an on specification recycled oil that contains less than one percent sulfur, typically 0.5%. The No. 4 oil is a blended oil specified for use in burners requiring No. 6 fuel oil. Permit limits applicable when firing No. 6 fuel oil will still be adhered to when firing the No. 4 fuel oil. A copy of the oil specifications is attached for your review.

Your timely response is greatly appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Steve Webb".

Steve Webb

SW/tmc

Standard Specifications for FUEL OILS Produced by:

PENSACOLA POLLUTION CONTROL INC.

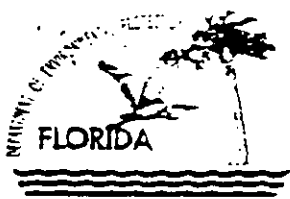
NO. 4 RECYCLED FUEL OIL: An On Specification blend of lube oils, hydraulic oils and turbine oils blended for use in burners requiring No.2 thru No. 6 fuel oils.

Viscosity	Flashpoint	ash%	sulphur%	B.T.U. per gal
NO. 4: (45) (125)	190deg/f	.08	.50	144,310

On Specification fuel oil shall not exceed the specification set forth in 40 CFR part 266.44.

ARSENIC	5 ppm max.
CADMIUM	2 ppm max.
CHROMIUM	10 ppm max
LEAD	100 ppm max
FLASH POINT	100 deg/F MIN.
TOTAL HALOGENS	1,000 ppm max.
P.C.B.'s	2 ppm max.

Off Specification fuel oil may exceed any of the above parameters and may be subject to 40 CFR 266.118/.



# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida

Virginia E. Wetherell  
Secretary

June 20, 1995

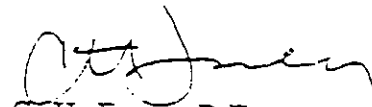
CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Steve Webb  
Champion International Corporation  
Post Office Box 87  
Cantonment, Florida 32533-0087

Dear Mr. Webb:

The Bureau of Air Regulation received your June 13, 1995, request to modify a permit issued to Champion International Corporation. Before we can begin processing your request, we will need a \$250 processing fee for the permit modification. If you have any questions, please call Patry Adams at (904)488-1344.

Sincerely,

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

CHF/kw

cc: Bruce Mitchell ✓

Florida Department of  
**Environmental Protection**

Memorandum

---

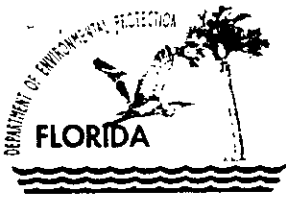
TO: Clair Fancy  
FROM: Al Linero *AA Lin 1/25*  
DATE: August 25, 1995  
SUBJ: Modification of Permit  
Champion International Corporation

Attached is an Intent to Issue, Public Notice, and letter modifying a permit (draft). The modification will allow Champion International Corporation of Cantonment, Florida, to report the nitrogen oxides (NOx) continuous emissions monitoring data on a 24-hour average basis instead of the 30-day rolling average specific in the new source performance standard (NSPS). The modification will also allow the burning of No. 4 fuel oil (contains "on-spec" used oil) in the kiln-mud dryer.

The 24-hour NOx standard in the Department's BACT is more restrictive than the NSPS. There is no change in the allowable heat input or emissions caused by No. 4 fuel oil being burned in the kiln mud dryer. The standard requirements from 40 CFR 279, Subpart B pertaining to on-spec used oil have been incorporated into the permit.

AAL/wh/t

attachments



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

*① Kinami*  
*② Kim* } No need to cc: Bruce any more since this is  
not his area anymore. *al*

June 20, 1995

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Sincerely,

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

CHF/kw

cc: Bruce Mitchell ✓



RECEIVED

JUN 19 1995

Bureau of  
Air Regulation

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Department of Environmental Protection  
Twin Towers Office Building  
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June 13, 1995

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SW/tmc

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PENSACOLA POLLUTION CONTROL INC.

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Viscosity	Flashpoint	ash%	sulphur%	B.T.U. per gal
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On Specification fuel oil shall not exceed the specification set forth in 40 CFR part 266.44.

ARSENIC	5 ppm max.
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-----  
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-----