

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

November 9, 1987

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. T. P. Crane, Vice President
Operations Manager
Champion International Corporation
Post Office Box 87
Cantonment, Florida 32533

Dear Mr. Crane:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to install a skid mounted temporary gas fired package boiler, generating 125,000 lbs/hr steam at 600 psig, at Champion's existing facility located in Cantonment, Escambia County, Florida. For a maximum of two years, the 195 MMBtu/hr boiler will allow Champion to operate through the winter months and repair existing boilers while on down time.

Please submit, in writing, any comments which you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

Willard Hanks

for C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/bm

Attachments

cc: E. Middleswart, NW Dist.
D. Smith, P.E.
D. Arceneaux, CIC
W. Aronson, EPA
B. Pittman, Esq.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Champion International Corporation
Post Office Box 87
Cantonment, Florida 32533

DER File No. AC 17-140962
Federal No. PSD-FL-126

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) to install a skid mounted temporary gas fired package boiler, generating 125,000 lbs/hr steam at 600 psig, at Champion's existing facility located in Cantonment, Escambia County, Florida. For a maximum of two years, the 195 MMBtu/hr boiler will allow Champion to operate through the winter months and repair existing boilers while on down time. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Champion International Corporation, applied on October 23, 1987, to the Department of Environmental Regulation for a construction permit.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (FAC) Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit was needed for the proposed work.

Pursuant to Section 403.815, F.S., and FAC Rule 17-103.150, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit

application. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 9 Nov. 87.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Judy A. Rogers 9 Nov. 87
Clerk Date

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to install a skid mounted temporary gas fired package boiler, generating 125,000 lbs/hr steam at 600 psig, at Champion's existing facility located in Cantonment, Escambia County, Florida. For a maximum of two years, the 195 MMBtu/hr boiler will allow Champion to operate through the winter months and repair existing boilers while on down time. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application 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:

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

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.

Technical Evaluation
and
Preliminary Determination

Champion International Corporation
Cantonment, Escambia County, Florida

Gas Fired Package Boiler
Permit No. AC 17-140962
PSD-FL-126

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

November 6, 1987

I. Application

A. Applicant

Champion International Corporation
Post Office Box 87
Cantonment, Florida 32533

B. Project and Location

The applicant proposes to install a skid mounted temporary gas fired package boiler, generating 125,000 lbs/hr steam at 600 psig, at Champion's plant site in Escambia County, Florida. The 195 MMBtu/hr boiler will allow Champion to operate through winter months and repair down time on existing boilers, for a maximum period of two years. The proposed project will emit the pollutants nitrogen oxides (NO_x), sulfur dioxide (SO₂), particulate matter (PM), carbon monoxide (CO) and volatile organic compounds (VOC).

The UTM coordinates of this facility are Zone 16, 469.3 km East and 3385.72 km North.

C. Sources Reviewed

The sources reviewed in this technical evaluation will be the proposed temporary boiler and Boiler Nos. 1, 3, and 4 which have been shut down.

Champion applied for a construction permit for the proposed project on October 29, 1987, and the application was deemed complete on November 6, 1987.

D. Facility Category

Champion's facility in Cantonment is classified in accordance with the Standard Industrial Classification (SIC) Code as Major Group 26, Paper and Allied Products; Group No. 262, Paper Mills; Industry No. 2621, Paper Mills.

The proposed project will be a major modification to a major facility, as defined by Chapter 17-2 of the Florida Administrative Code (FAC).

II. Project Description

The applicant proposes to operate a rental skid mounted temporary gas fired boiler to supply 125,000 lbs/hr steam at 600 psig. Temporary gas, water, and steam lines will be run to the boiler. A rental stack will also be installed. The maximum heat input capacity of the boiler will be 195 MMBtu/hr.

This boiler is needed due to less than design steam production from the existing No. 1 and 2 Power Boilers. The package boiler will allow Champion to operate through winter months and repair down time on existing boilers. The temporary boiler is anticipated to be needed for a maximum of two years.

III. Rule Applicability

The proposed project will result in emissions of NOx, SO₂, PM, CO and VOCs. It is subject to preconstruction review in accordance with Chapter 403 of the Florida Statutes and Chapters 17-2 and 17-4 of the Florida Administrative Code (FAC).

The proposed project will be located in Escambia County, an area designated as unclassifiable for PM, but attainment for NOx, SO₂, CO and VOCs, in accordance with Rules 17-2.420 and 17-2.430, FAC.

Although Boiler Nos. 1, 3, and 4 have been considered in this review, emission credits cannot be granted for their shut-down since operations were ceased prior to the contemporaneous period of this application, in accordance with Rule 17-2.500(2), FAC.

Therefore, the proposed project will be a major modification to a major facility and will be subject to a Prevention of Significant Deterioration (PSD) Review in accordance with Rule 17-2.500(2)(d)4, FAC.

However, since the pollutant emitting period will not exceed two years, the proposed project will be exempt from the requirements of Rules 17-2.500(5)(d), (e), (f), and (g), FAC, in accordance with Rule 17-2.500(3)(c), FAC.

The proposed project will not be subject to New Source Performance Standards in accordance with 40 CFR 60 Subpart Db - Standards of Performance for Industrial Steam Generating Units, because the rental boiler was built before 1984, the NSPS applicability date.

The applicable emission limiting standards will be determined by the Best Available Control Technology (BACT) for PM, SO₂, NOx, CO, and visible emissions (VE) in accordance with Rule 17-2.630, FAC.

The proposed project will be required to show compliance in accordance with Rule 17-2.700, FAC, with the emission limiting standards for:

- a) NOx, by EPA Method 7.
- b) CO, by EPA Method 10.
- c) VE, by DER Method 9.

Note: Other DER Approved Methods may be used with prior Departmental approval.

IV. Emission Limitations

The proposed project will be in operation no longer than two years, at 8760 hrs/yr, and will be limited by the attached BACT determination. Emission estimates are as follows:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>	<u>TPY</u>
NOx	0.2	39	147
CO	0.24	47	205
SO ₂	0.0006	0.12	1
PM	0.005	1	4
VOC	0.003	1	4

Visible emissions will be limited to 5% opacity.

Note: Except for the NOx NSPS standard based estimates, and the CO manufacturer's estimates, the other criteria pollutant emission estimates are based on AP-42.

V. Air Quality Analysis

A. Introduction

Champion proposes to temporarily lease and operate a gas-fired package boiler. The duration of operation is not to exceed two years. The operation of this boiler will have the potential to emit NOx and CO in PSD significant quantities. Both of these pollutants are, thus, subject to the requirements of the PSD regulations as defined in Rule 17-2.500, of the Florida Administrative Code.

An exemption for temporary sources from several of the specific requirements is contained in Rule 17-2.500(3)(c), FAC. This exemption applies to the preconstruction review requirements contained in paragraphs 17-2.500(5)(d), (e), (f), and (g), FAC. It is applicable only if the duration of emissions would not exceed two years and the applicant has provided the Department with reasonable assurance that the increased emissions will not cause or contribute to a violation of an ambient air quality standard or have a significant impact on any Class I area or area where a PSD increment is violated.

The preconstruction review requirements applicable to Champion include:

- A Best Available Control Technology (BACT) analysis, and;
- An Ambient Air Quality Standards (AAQS) analysis.

Based on these analyses, the Department has reasonable assurance that the proposed project as described in this permit and subject to the conditions, of approval proposed herein, will not cause or contribute to a violation of an ambient air quality standard. A discussion of the required AAQS analysis follows.

B. Ambient Air Quality Standards Analysis

In order to satisfy the reasonable assurance requirement, the applicant submitted the ambient air quality analysis previously completed at the Champion (formerly St. Regis) facility for the construction of the No. 4 Bark Boiler. A series of PSD permits have been associated with this bark boiler. The permit PSD-FL-041 addressed the original construction of the No. 4 Bark Boiler; the permit PSD-FL-066 addressed allowance for coal burning in the No. 3 and No. 4 boilers; and, the permit PSD-FL-070 addressed an increase in sulfur content of the coal used in the boilers. The air quality analyses for these permits included dispersion modeling for both NO_x and CO. The modeling showed that the maximum ambient air concentrations expected due to the increased emissions from the new No. 4 boiler in conjunction with all other sources of NO₂ and CO were much less than the air quality standards for these pollutants. Included in these other sources were emissions from power boiler Nos. 1, 3, and 4 which have been subsequently shut down. The emission decreases from these power boilers offsets much, if not all, of the currently proposed increase. There have been no significant, new sources of NO_x or CO in the area surrounding the Champion facility and the background levels have not significantly changed.

The Department, in addition, completed a screening analysis using the PTPLU dispersion model. The emissions increase associated with the maximum operation of the proposed temporary boiler was input to the model. The results indicate that the emissions from the temporary boiler, in and of itself, will result in minimal ambient impacts. The maximum one-hour CO concentration is predicted to be less than 0.05 mg/m³, while the maximum one-hour NO₂ concentration is 30 ug/m³. These concentration increases can be compared to the ambient air quality standards for CO and NO₂.

<u>Pollutant</u>	<u>Florida AAQS</u>
CO	
1-hour	40 mg/m ³
8-hour	10 mg/m ³
NO ₂	
annual	100 ug/m ³

Although the predicted concentrations are applicable to a one-hour average, a reasonable extrapolation of these results to the longer averaging times associated with the standards produces very small concentration levels.

The pollutants subject to PSD review, NO_x and CO, do not have maximum allowable increases (increments) defined for them. As such, an increment analysis is not applicable. Also, the Champion facility is not located within 100 km of any Class I area, therefore, no analysis is necessary.

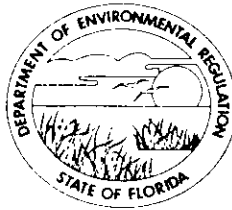
In summary, the emissions increase of NO_x and CO from the temporary boiler will have minimal air quality impacts. The Department is reasonably assured that the operation of the temporary boiler will not cause or contribute to a violation of an ambient air quality standard.

VI. Conclusion

Based on the information provided by Champion, the Department has reasonable assurance that the proposed temporary gas-fired boiler, as described in this evaluation, and subject the conditions proposed herein, will not cause or contribute to a violation of an ambient air quality standard or PSD increment, or any other provisions of Chapter 17-2, FAC.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

PERMITTEE:

Champion International Corp.
Post Office Box 87
Cantonment, FL 32533

Permit Number: AC 17-140962

Expiration Date: June 1, 1988

County: Escambia

Latitude/Longitude: 30° 36' 19"N
87° 19' 13"W

Project: Gas Fired Package Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction of a steam generating facility consisting of a temporary rental gas-fired skid mounted package boiler, at Champion's plant site in Escambia County, Florida. The boiler will have a maximum heat input capacity of 195 MMBtu/hr producing 125,000 lbs/hr steam at 600 psig.

Construction will be in accordance with the permit application and plans, documents and reference material submitted unless otherwise stated in the General and Specific Conditions herein.

This project's federal permit number: PSD-FL-126

Attachments:

1. Champion's Application package dated October 22, 1987.
2. Additional information submitted by Champion, dated October 29, 1987.
3. Champion's letter on boiler details dated, November 5, 1987.

PERMITTEE:
Champion International Corp.

Permit Number: AC 17-140962
Expiration Date: June 1, 1988

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 Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement 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 applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), 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. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use 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.

5. 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 penalties 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, unless specifically authorized by an order from the Department.

PERMITTEE:
Champion International Corp.

Permit Number: AC 17-140962
Expiration Date: June 1, 1988

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. 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 noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Champion International Corp.

Permit Number: AC 17-140962
Expiration Date: June 1, 1988

GENERAL CONDITIONS:

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.

9. 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 Sections 403.73 and 403.111, Florida Statutes.

10. The 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.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:
Champion International Corp.

Permit Number: AC 17-140962
Expiration Date: June 1, 1988

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The package boiler may operate continuously (8760 hrs/yr) for a maximum period of two years.

2. Only natural gas shall be fired into the boiler. The maximum heat input shall not exceed 195 MMBtu/hr, reflecting a steam generation rate of 125,000 lbs/hr at 600 psig.

3. The maximum allowable emission shall not exceed the following quantities:

PERMITTEE:
Champion International Corp.

Permit Number: AC 17-140962
Expiration Date: June 1, 1988

SPECIFIC CONDITIONS:

- a) NOx - 0.2 lb/MMBtu heat input
- 39 lbs/hr
- 147 tons/yr
- b) CO - 47 lbs/hr
- 205 tons/yr
- c) Visible Emissions (VE) - 5% opacity

Note: For inventory purposes only the emissions of SO₂, PM, and VOC are tabulated below:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>	<u>TPY</u> (tons per year)
SO ₂	0.0006	0.12	1
PM	0.005	1	4
VOC	0.003	1	4

Good combustion practices shall be observed as control measures for PM, SO₂, and VOC.

4. Initial and annual compliance tests shall be conducted as follows:

- a) EPA Method 7 for NOx
- b) EPA Method 10 for CO
- c) DER Method 9 for VE

Other DER approved methods may be used in place of the above tests, only after prior approval from the Department.

5. DER's district office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the district office with 45 days of test completion.

The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (Rule 17-2, FAC)

PERMITTEE:
Champion International Corp.

Permit Number: AC 17-140962
Expiration Date: June 1, 1988

SPECIFIC CONDITIONS:

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to the Department's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rule 17-2 and 17-4, FAC)

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4, FAC)

6. Any change in the method of operation, fuels, equipment or operating hours shall be submitted for approval to DER's District office.

Issued this _____ day of _____, 19__

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

Best Available Control Technology (BACT) Determination
Champion International Corporation
Escambia County

The applicant plans to install a 195 MMBtu/hr natural gas fired boiler at their facility in Cantonment, Florida. The boiler, a skid mounted rental package unit, will be used only temporarily until existing boilers can be repaired or replaced to supply the necessary steam load. The temporary boiler is scheduled to operate 8,760 hours per year.

A BACT determination is required for particulates and sulfur dioxide as set forth in the Florida Administrative Code Rule 17-2.600 (6) - Emissions Limiting and Performance Standards. In addition, the Department has performed a BACT determination for nitrogen oxides (NOx) and carbon monoxide (CO) based on the assumption that the emissions increase of NOx and CO could be greater than the PSD significant rate of 40 and 100 tons per year respectively. The Department which is presently awaiting information that would indicate if BACT for NOx and CO would indeed apply, has decided to go ahead with making a determination of BACT for NOx and CO to expedite the processing of the permit.

BACT Determination Request by the Applicant:

Particulate, sulfur dioxide, nitrogen oxides and carbon monoxide emissions to be controlled by the firing of natural gas.

Date of Receipt of a BACT Application:

October 22, 1987

Review Group Members:

The determination was based upon comments received from the Stationary Source Control Section.

BACT Determined by DER:

The amount of particulate and sulfur dioxide emissions from the boiler will be limited by the firing of natural gas.

Visible Emissions Not to exceed 5% opacity.

DER Method 9 (17-2.700(6)(a)9, FAC) will be used to determine compliance with the opacity standard.

Nitrogen oxides emissions shall not exceed 0.20 lb/MMBtu heat input.

Carbon monoxide emissions shall not exceed 46.8 pounds per hour.

BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern in that most of the fuel sulfur becomes SO₂ and particulate emissions from fuel burning are related to the sulfur content. The Department agrees with the applicant's proposal that the firing of natural gas is BACT for particulates and SO₂.

The emission rate of nitrogen oxides proposed by the applicant is equivalent to 0.20 pounds per million Btu heat input. This proposed emission rate is equal to the New Source Performance Standard (NSPS) for natural gas steam generating units with heat input capacities greater than 100 million Btu/hr and maximum design heat release rates greater than 70,000 Btu/hr-ft³. In addition to meeting the NSPS for these steam generating units, a review of other BACT determinations for natural gas fired boilers indicates that the proposed emission level for both nitrogen oxides and carbon monoxide is consistent with several of the determinations on record. In accordance with this criteria and the temporary nature of this installation, the applicant's proposed NOx and CO emission rates are justified as being BACT for this source.

Details of the Analysis May be Obtained by Contacting:

Barry Andrews, P.E. BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Recommended by:

C. H. Fancy, P.E.
Deputy Bureau Chief, BAQM

Date

Approved by:

Dale Twachtmann, Secretary

Date

P 274 007 656

RECEIPT FOR CERTIFIED MAIL

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

* U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Sent to T.P. Crane, V.P., Ops. Mgr.	
Champion International Corp.	
Street and No. P.O. Box 87	
P.O., State and ZIP Code Cantonment, FL 32533	
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 Mailed: 11/09/87	
Permit: AC 17-140962	

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult Postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.
2. Restricted Delivery.

3. Article Addressed to: **T.P. Crane, V.P., Operations Manager, Champion International Corp., P.O. Box 87, Cantonment, FL 32533**

4. Type of Service:
 Registered Insured
 Certified COD
 Express Mail

Article Number: **P 274 007 656**

Always obtain signature of addressee or agent and
DATE DELIVERED

5. Signature - Addressee
 X

6. Signature - Agent
 X **Ketoy Odame**

7. Date of Delivery
11/10/87

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

DOMESTIC RETURN RECEIPT

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to install a skid mounted temporary gas fired package boiler, generating 125,000 lbs/hr steam at 600 psig, at Champion's existing facility located in Cantonment, Escambia County, Florida. For a maximum of two years, the 195 MMBtu/hr boiler will allow Champion to operate through the winter months and repair existing boilers while on down time. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application 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:

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination.

CORRECTED: NOVEMBER 10, 1987

P 274 007 657

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1985-480-794

Sent to T.P. Crane, V.P. Champion International Corp.	
Street and No. P.O. Box 87	
P.O., State and ZIP Code Cantonment, FL 32533	
Postage	3
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	3
Postmark or Date Mailed: 11/10/87 Permit: AC 17-140962	

PS Form 3800, June 1985

PS Form 3811, July 1983 447-945

SENDER: Complete items 1, 2, 3 and 4.
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.
2. Restricted Delivery

3. Article Addressed to T.P. Crane, V.P.
Champion International Corp.
P.O. Box 87
Cantonment, FL 32533

4. Type of Service: Registered Insured
 Certified COD
 Express Mail

Article Number: P 274 007 657

Always obtain signature of addressee or agent and
DATE DELIVERED

5. Signature - Addressee
X [Signature]

6. Signature - Agent
X [Signature]

7. Date of Delivery

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

DOMESTIC RETURN RECEIPT