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DER-BAQM

13 February 1991

Mr. Barry Andrews  
Administrator, Permits and Standards Section  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Mr. Andrews:

We appreciated the opportunity to discuss Champion's proposed boiler project for the Cantonment Mill with you and your staff on 16 January 1991. As we explained at our meeting, Champion plans to apply for a construction permit for their temporary number 5 gas-fired package boiler. This will allow Champion to continue to operate this source to provide steam to the Mill.

Based upon our discussions, we understand that the agency will consider two approaches to obtaining the necessary construction and operating permits. The first approach involves using credits from the existing Number 1 and Number 2 boilers at the Mill to "net out" of PSD. The most recent representative two years of operational data on these boilers (1988 and 1990) would be used to calculate contemporaneous emission credits. These would be based on actual fuel use (natural gas) in the boilers and AP-42 emission factors, initially. Testing on the boilers would be conducted to provide more definitive emission factors prior to issuance of an operating permit by the Department. We understand that a representative of the Department must be notified prior to conducting any tests. The operating permit would involve an emissions cap for all three boilers (Number 1, Number 2, and Number 5) which would be based on actual emissions for Boilers 1 and 2 for 1988 and 1990. A Federally enforceable permit limit and reporting/recordkeeping strategy must be identified in the permit application. The Department indicated that quarterly or annual reports based on fuel meter readings and boiler-specific emission factors would likely meet this requirement.

The second approach involves undergoing a PSD review for the Number 5 boiler. If this approach is taken, the Department noted that only pollutants emitted by the Number 5 boiler in excess of the PSD significant emissions increase rates would require a "Top Down"

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BACT analysis and an air quality modeling demonstration. Based on an initial evaluation, the only pollutants which would be included in these requirements are nitrogen oxides and carbon monoxide. Champion noted that a nitrogen oxide emission rate of 0.1 pounds per million BTU's could be met by the boiler. The Department indicated that a level such as that would likely be BACT for the boiler but further noted that an economic justification that a more stringent level was not BACT would be required in the permit application.

The air quality modeling demonstration required for the permit was discussed with Cleveland Holloway, of the Department. He noted that only nitrogen oxides and possibly carbon monoxide would need to be modeled if a PSD permit application is submitted. A non-applicability demonstration would not require a modeling demonstration. If impacts are predicted to be below the "de minimis" levels (i.e.,  $1 \text{ ug/m}^3$  for  $\text{NO}_x$ ) other sources at the Mill and in the area would not need to be included in the modeling study. Meteorologic data for Pensacola (surface measurements) and Apalachicola (upper air measurements) for 1985-1989 were identified as acceptable data for the modeling demonstration. The Industrial Source Complex Model is considered acceptable for the modeling demonstration and the model can be executed in the rural regulatory mode with flat terrain (i.e., no terrain elevations for receptors). A polar co-ordinate grid ( $10^\circ$  increments) with initial receptor spacing of 100 meters out to 1000m, 250 meter spacing to 3000m and 1000m spacing out to 10 km was identified as acceptable by the Department. The EPA SCREEN model is considered acceptable for modeling CO impacts.

The stack currently serving the Number 5 boiler is not Good Engineering Practice (GEP) height. The Department indicated that Champion could take credit for raising the stack up to the formula GEP if Champion chooses to increase the stack height.

The Department also noted that the applicability of NSPS to the Number 5 boiler must be investigated. Champion noted that the Department had reviewed the applicability of NSPS in the previous temporary permit application and concluded that NSPS did not apply since the boiler was built prior to the effective date of the NSPS regulations. Documentation from Champion relative to this issue will be provided in Champion's permit application, as requested by the Department. The Department agreed that the boiler will meet the NSPS emissions limit and the only question relative to NSPS was continuous monitoring for nitrogen oxides. The Department also noted that annual emissions testing might satisfy the Departments concern relative to monitoring of nitrogen oxides.

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The current temporary permit for Boiler Number 5 expires on 1 April 1991. The Department indicated that it would work with Champion to develop a construction permit or extend the current temporary permit, if possible, to enable Champion to continue operating the Number 5 boiler. If a non-PSD permit is requested, a 15-day public notice will be required before a construction permit is issued. A PSD permit will require a 30-day public notification. In either event, Champion understands that the Department has agreed to expedite the review and go to public notification as soon as a complete permit application is received.

The final issue discussed was permit fees. A PSD permit will include a \$5,000 permit application fee. If only a state permit is required, the permit fee is to be based on the worst case controlled pollutant emission rate with a maximum fee of \$2,500.

We appreciate your assistance on this important project. We would appreciate a written response concurring with our understanding of the issues discussed above, or a clarification of any issues the Department feels require additional discussion.

Very truly yours,

ROY F. WESTON, INC.

John B. Barone, Ph.D.  
Technical Director

JBB/ese

cc: Cleveland Holladay  
Bruce Mitchel  
David Arceneaux  
Ed Inman

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

DEC - 3 1987

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Margaret V. Janes, Planner  
Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Champion International Corporation (PSD-FL-126)

Dear Ms. Janes:

This is to acknowledge receipt of the permit application for the above-referenced source. After reviewing the application, we have one comment to offer.

For your information, as a result of the North County Resource Recovery PSD remand, source applicants must now consider unregulated pollutants (i.e., air toxics) which may be of concern to the public when performing a best available control technology (BACT) determination for regulated pollutants. For gas fired boilers, the associated air toxics would include formaldehyde and polycyclic organic matter (POM).

In addition, EPA will soon be requiring the "top-down" approach with regard to future BACT determinations. As you may know, this approach requires an applicant to first evaluate the most stringent method of control taking into consideration the control of unregulated air toxics. If the applicant is able to prove that such control is technically and/or economically infeasible, the next most stringent method of control is evaluated and so on. Therefore, we suggest that Champion consider performing a "top down" BACT determination taking into account the two associated unregulated air pollutants.

Please forward a copy of the preliminary determination and draft permit upon issuance. If you have any additional comment or information, please contact me or Gary Ng of my staff at (404) 347-2864.

Sincerely yours,

*Bruce P. Miller*

Bruce P. Miller, Chief  
Air Programs Branch  
Air, Pesticides, and Toxics  
Management Division

Copied CHF/BT

*Pradeep Bhal*  
*Tom Rogers*

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Atlanta, GA

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