

Florida Department of Environmental Protection

Memorandum

TO: Michael G. Cooke, Division of Air Resource Management

THRU: Trina Vielhauer, Bureau of Air Regulation *TV*
Jim Pennington, Air Permitting North *JMP*

FROM: Bruce Mitchell *BM*

DATE: January 5, 2005

SUBJECT: Extension of Air Construction Permit Expiration Date
International Paper Company
Pensacola Mill
Air Permit No. 0330042-007-AC

Attached for your approval and signature is a permit modification that extends the permit expiration date for the above referenced project.

Day 16 is January 5, 2005. I recommend your approval and signature.

Attachments

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mr. Nicki Slusser
 Mill Manager & Responsible
 Official
 International Paper Company
 Pensacola Mill
 375 Muscogee Road
 Cantonment, Florida 32533-0087

2. Article Number (Transfer from service label) **7000 1670 0013 3109 8833**

PS Form 3811, August 2000

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee

B. Received by (Printed Name) **AUBREY C. SIMMONS** C. Date of Delivery **1-19-05**

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

102595-02-M-1540

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 1670 0013 3109 8833

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
Mr. Nicki Slusser, Mill Manager
International Paper Company
375 Muscogee Road
Cantonment, Florida 32533-0087

PS Form 3800, May 2000

See Reverse for Instructions



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

January 6, 2005

CERTIFIED MAIL - Return Receipt Requested

Mr. Nicki Slusser
Mill Manager & Responsible Official
International Paper Company
Pensacola Mill
375 Muscogee Road
Cantonment, Florida 32533-0087

Re: Extension of Air Construction Permit Expiration Date
International Paper Company - Pensacola Mill
Air Permit No.: 0330042-007-AC

Dear Ms. Slusser:

On December 20, 2004, the International Paper Company requested an extension of the expiration date of air construction Permit No. 0330042-007-AC for the Pensacola Mill located at 375 Muscogee Road, Escambia County, Florida. International Paper Company requests the additional time to complete construction, perform any required tests, and submit a timely Title V operation permit application. The Department approves this request.

Determination: The modification to the Kamyr digester has been completed, but the installation of the new causticizer with associated piping and the two new medium consistency pumps have been postponed until 2006. The expiration date is hereby extended from **April 30, 2005**, to **April 30, 2007**, to provide the necessary time to complete construction, perform any required tests, and submit a timely Title V operation permit application. This permitting action does not authorize any new construction. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

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Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Air Construction Permit: Expiration Date Extension
International Paper Company – Pensacola Mill
0330042-007-AC
Page 3 of 4

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

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

Executed in Tallahassee, Florida.



Michael G. Cooke, Director
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail or sent by e-mail before the close of business on 1/18/05 to the persons listed:

Ms. Nicki Slusser *, Mill Manager and R.O., 375 Muscogee Road, Cantonment, Florida 32533-0087
Jim Spahr, IPC
Mr. Daniel B. Smith, P.E., CE
Ms. Sandra Veazey, NED

Clerk Stamp

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

Mary J. Ammy 1/18/05
(Clerk) (Date)

PENSACOLA MILL
375 MUSCOGEE ROAD
PO BOX 87
CANTONMENT, FL 32533-0087
PHONE: 850.968.2121

December 14, 2004

Ms. Sandra Veazey
Florida Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, FL
32501-5794

RECEIVED
DEC 20 2004
BUREAU OF AIR REGULATIONS

RE: Request for Extension of Expiration Date for Air Construction Permit No. 0330042-007-AC

Dear Ms. Veazey:

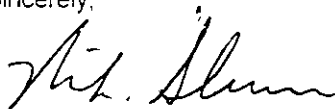
International Paper's (IP) Pensacola Mill has been issued the non-PSD Air Construction Permit referenced above. This permit covers Phase I of a two-phase production increase project. Air dispersion modeling conducted for the Phase II PSD Air Construction Permit Application showed ambient air quality problems resulting from Gulf Power's Crist Plant emissions. The permitting process for IP's Phase II AC Permit Application was put on hold pending Gulf Power's resolution of these issues.

Because of this delay, IP has not completed all of the projects associated with the Phase I AC Permit. The physical modification of the Kamyr Digester System has been completed. However, the installation of the new causticizer with associated piping and the two medium consistency pumps has been postponed until 2006.

International Paper hereby requests a two-year extension of the expiration date for Air Construction Permit No. 0330042-007-AC to April 30, 2007.

If you have any questions please contact Jim Spahr at 850.968.2121 x3833.

Sincerely,



Nicki Slusser
Mill Manager

Cc: Bruce Mitchell, FDEP Tallahassee



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

Permittee:
International Paper Company
Pensacola Mill
Post Office Box 87
Cantonment, FL 32533-0087

Permit No.: 0330042-007-AC
Facility ID No.: 0330042
SIC Nos.: 26; 2611
Expiration Date: April 30, 2005
Project: Physical modification of the
Kamyr Digester System; addition of a
new causticizer with piping; and,
installation of 2 medium consistency
pumps for the Pine O₂ Delignification
and Bleach Plant area

This permit is issued for the following: 1) physical modification of the Kamyr Digester System; 2) addition of a new causticizer with piping to the causticizing/lime production operations; and, installation of 2 medium consistency pumps for the Pine O₂ Delignification and Bleach Plant area. Actual production limitations are being established to effect no changes in actual emissions and are based on calendar years 1998 and 1999. These changes will occur at the existing International Paper Company - Pensacola Mill located at 375 Muscogee Road, Escambia County. UTM Coordinates: Zone 17; 469.0 km East; and, 3386.0 km North; Latitude: 30° 36' 30" North; and, Longitude: 87° 19' 13" West.

STATEMENT OF BASIS: This air construction permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Title V Air Operation Permit Revision No. 0330042-005-AV
Air Construction Permit No. 0330042-006-AC

Documents on file with the Department:

Application request received April 22, 2003
Supplemental Information received via e-mail on May 30, 2003, from Mr. Jim Spahr
Letter with enclosures received July 3, 2003, from Ms. Nicki Slusser

Joseph Kahn, P.E., Acting Director
Division of Air Resource Management

JK/sms/bm

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GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither 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 is not 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 this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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 and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - (a) Have access to and copy any records that must be kept under conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit;and,
 - (c) Sample or monitor any substances or parameters at any location reasonable 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 provide the Department with the following information:
 - (a) A description of and cause of noncompliance; and,
 - (b) The period of noncompliance, including 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. 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 for 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 involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120, F.A.C., 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 or a copy thereof shall be kept at the work site of the permitted activity.

14. The permittee shall comply with the following:

(a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

(b) The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five (5) years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

(c) Records of monitoring information shall include:

1. the date, exact place, and time of sampling or measurements;
2. the person responsible for performing the sampling or measurements;
3. the dates analyses were performed;
4. the person responsible for performing the analyses;
5. the analytical techniques or methods used; and,
6. 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 the 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 corrected promptly.

[Rule 62-4.160, F.A.C.]

SPECIFIC CONDITIONS:

A. General. Title V Air Operation Permit, No. 0330042-005-AV, and air construction permit, No. 0330042-006-AC, are incorporated by reference, except for the following changes.

B. Kamyr (Continuous) Digester System (KDS).

1. Production from the KDS shall not exceed 271,985 air dried tons bleached pulp per year nor 293,744 air dried tons unbleached pulp per year [based on the average of calendar years (CYs) 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

2. For the construction/modification of the KDS to replace the existing extraction screens with diagonal extraction screens.

C. Causticizing Operations.

1. Lime production shall not exceed 155,108 tons CaO (calcium oxide) per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – PTE, F.A.C.]

2. For the construction of a new causticizer body and support piping.

D. Pine O₂ Delignification and Bleach Plant.

1. Bleach Plant production shall not exceed 245,030 oven dried tons pulp per year, for the A Bleach Plant Line (softwood), nor 239,677 oven dried tons pulp per year, for the B Bleach Plant Line (hardwood) [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – PTE, F.A.C.]

2. For the installation of two (2) medium consistency pumps in the Pine O₂ Delignification and Bleach Plant area.

E. Batch Digester System (BDS).

1. Production from the BDS shall not exceed 266,042 air dried tons bleached pulp per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

F. Recovery Boiler (RB) Operations (Nos. 1 and 2).

1. Black liquor solids firing in the RB Operations (Nos. 1 and 2) shall not exceed 941,560 tons per year [based on the average of CYs 1998 and 1999].

[Requested by applicant; and, Rules 62-4.070(3) and 62-210.200, Definitions – Potential to Emit (PTE), F.A.C.]

G. Miscellaneous

1. PSD Applicability – Phased Project. Based on the application for the above referenced new emissions unit construction and physical modifications to existing emissions units, International Paper Company has acknowledged that this permitting action addresses only Phase I of a phased project. The Phase II permitting action shall include the impact of the above referenced permitting action and their associated potential pollutant emissions changes as if never constructed or modified.

[Application received April 22, 2003; and, Rule 62-212.400(2)(g), F.A.C.]

12/29/04

Dear Yi,

RE: ARMS updates for your review and approval.

Good afternoon. In ARMS, I have updated the the following permitting project:
International Paper Company: 0330042-007-AC (Constuction – modification)

Many thanks!

Bruce