

July 21, 2003

Bruce Mitchell  
Florida Department of Environmental Protection  
Division of Air Resource Management  
2600 Blair Stone Road MD 5500  
Tallahassee, Florida 32399-2400

**Subject: International Paper Pensacola Mill - Mill Viability Project Phase II PSD  
Application Submittal PSD-FL-335  
0330042-008-AC**

Dear Mr. Mitchell:

Enclosed are five (5) copies of the Phase II PSD Application for the Mill Viability Project at International Paper Company's (IP's) Pensacola Florida Mill. This permit application is a follow-up to the discussions that we had with you and other Florida Department of Environmental Protection (DEP) staff in December, 2002. This application also takes into account the information presented in the IP April, 2003 Phase I submittal. The permit application addresses the Mill's plans for a multi-year project to upgrade the waste water treatment system and install a pipeline to future wetlands at the head of the Perdido Bay. In support of this project, the Mill will need to produce an additional 150 air dried bleach tons of slush pulp per day (ADBTP/day) to maintain the viability of the Mill.

Please forward three (3) copies of the application to Mr. Cleve Holladay of your office. IP requests that Mr. Holladay forward a copy to Mr. Stan Krivo of the United States Environmental Protection Agency (EPA) Region IV office and forward a copy to the Federal Land Manager, Mr. Bud Rolofson, who is responsible for the Breton Wilderness Area. IP has provided a copy of the application to Mr. Rick Bradburn of the Northwest District of the DEP. IP will submit the requisite application fee under a separate submittal, directly from the Pensacola Mill.

Mr. Jim Spahr from the Pensacola Mill will contact you within the next several days to discuss the permit application and to arrange a time that is mutually agreeable to review the application in detail. Thank you in advance for your continued support and guidance as IP pursues this very important project.

Sincerely,  
All4 Inc.



William V. Straub, PE  
Principal Consultant

cc: Jim Spahr – International Paper  
Glenn Rives – International Paper  
Cleve Holladay – Florida DEP  
Rick Bradburn – Florida DEP  
Stan Krivo – EPA Region IV  
Bud Rolofson – Breton Wilderness Area  
John Egan – All4



# MEMORANDUM

<b>To:</b>	Bruce Mitchell	<b>Date:</b>	July 31, 2003
<b>From:</b>	Bill Straub <i>WS</i>		
<b>Subject:</b>	PE Sealed Pages for the IP Pensacola Mill Viability Project Air Construction Permit – Phase II PSD Application		
<b>cc:</b>			

Enclosed are five (5) copies of the Professional Engineer Statement page and the attached exception page. All of the copies have been sealed. I apologize for any confusion. Please give me a call if you have any questions at 610.933.5246 x 12.

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4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein\*, that:

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [✓], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

*[Handwritten Signature]*

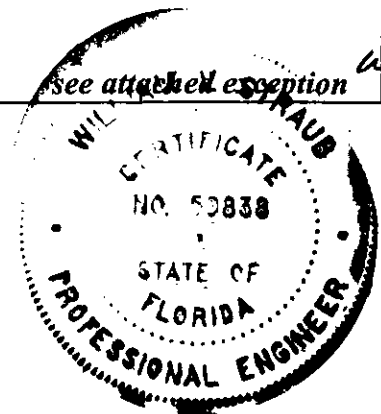
Signature

7/21/03

Date

(seal)

\* Attach any exception to certification statement.



As an independent professional engineer and air quality consultant, my responsibilities with this project included the following:

- review and recommendation of air pollution control strategy;
- qualification and quantification of emissions of regulated air pollutants;
- identification of permitting approach; and
- development of the PSD permit application.

IP engineering personnel and emission unit/air pollution control device vendors have lead the design and engineering modifications to the emissions units and associated air pollution control equipment. IP staff are not under my direct supervision. I reviewed the data to the extent that it relates to applicable air quality regulatory and permitting requirements and found it to be in conformity with sound engineering principles applicable to the control of emissions of air pollutants.



Signature

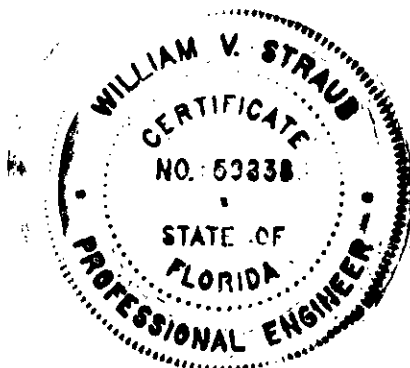
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**INTERNATIONAL  PAPER**

PENSACOLA MILL  
375 MUSCOGEE ROAD  
PO BOX 87  
CANTONMENT FL 32533-0087  
PHONE 850 968 2121

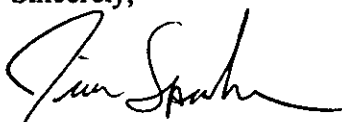
July 31, 2003

**Bruce Mitchell  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400**

Enclosed is check number 1802901296 for \$7,500.00 to cover Air Permit Application Fee for Air Permit Application filed on July 21, 2003.

If you have any questions, please contact me at (850) 968-2121 extension 3833.

Sincerely,



**Jim Spahr  
Environmental Engineer  
International Paper  
Pensacola Mill**

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Enclosure

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*[Handwritten Signature]*

Signature

7/21/03

Date

(seal)

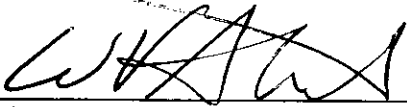
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\_\_\_\_\_  
Signature

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\_\_\_\_\_  
Date

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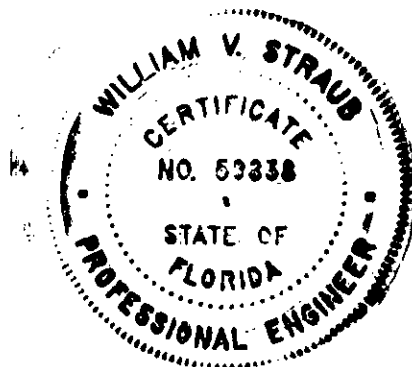








Table D-16  
 Summary of Baseline Fugitive PM<sub>10</sub> Emissions from Paved and Unpaved Roadways  
 IP Mill  
 Pinellas, FL

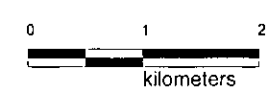
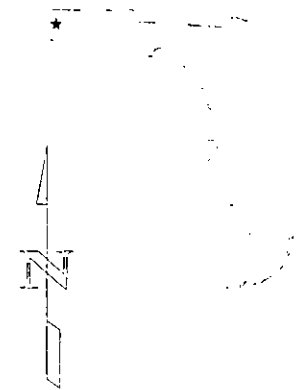
Baseline Conditions							A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W				
Route	Length (mi)	Trips	Empty	GVWT (lb)	Average	Trips*Wgt	959.376	323.664	445.104	397.056	257.136	667.392	1763.52	353.76	1021.68	586.08	205.92	454.08	546.48	1198.56	258.72	109.6	1716	997.92	1483.68	2555.52	3168	475.2	3067.68				
1	0.182	3	20,000	85,000	52,500	157,500																											
2	0.923	78	30,000	80,000	55,000	4,290,000																											
3	0.923	46	30,000	85,000	57,500	2,645,000																											
4	0.839	76	30,000	80,000	55,000	4,180,000																											
5	0.728	149	30,000	85,000	57,500	8,567,500																											
6	0.061	32	35,000	80,000	57,500	1,840,000																											
7	0.671	8	40,000	60,000	50,000	400,000																											
8	0.634	3	20,000	85,000	42,500	127,500																											
9	1.316	181	40,000	60,000	50,000	500,000																											
10	0.296	8	30,000	85,000	57,500	460,000																											
11	0.296	4	40,000	75,000	57,500	230,000																											
12	1.110	8	40,000	60,000	50,000	400,000																											
13	0.534	5	40,000	60,000	50,000	250,000																											
Total RT VMT							648,344																										
W =																																	
Mean GVWT (lb)							52,500	57,500	56,397																								
Total VMT/day							1.09	3.92	58.84																								
Grand Total VMT							649																										
E (lb/hr) <sub>PM10</sub>							0.00	0.01	0.10																								
E (ton/yr) <sub>PM10</sub>							0.01	0.03	0.42																								
E (lb/hr) <sub>PM2.5</sub>							0.01	0.03	0.49																								
E (ton/yr) <sub>PM2.5</sub>							0.04	0.15	2.13																								
Paved							$E = k(dL)^2 \cdot (W/3)^3 \cdot [1 + P(4N)]$ $k_{paved} = 0.016$ lb/VMT $k_{unpaved} = 0.082$ lb/VMT $dL = \text{site specific segment silt loadings (g/m}^2)$ $P = 110$ $N = \text{Area}$ 365																										
Segments A-P							Mean GVWT (lb) Total VMT/day Grand Total VMT Segment Silt Loadings (g/m <sup>2</sup> ) Values from run IP Mill 5.000E-02																										
Unpaved							$E = k(dL)^2 \cdot (W/3)^3 \cdot [1.65 + (P/365)]$ $k_{paved} = 2.6$ lb/VMT $k_{unpaved} = 10$ lb/VMT $P = 8.4$ % (Lumber sawmills) $P = 110$ $M = 0.2$ (default) $a = 0.8$ $b = 0.4$ $c = 0.3$ unpaired (g/s) <sub>PM10</sub> paired (g/s) <sub>PM10</sub> Volume Receptors Per Segment (g/s) <sub>PM10</sub> for each Volume Receptor (g/s) <sub>PM2.5</sub> for each Volume Receptor																										
PM10							0.000199 0.000821 0.011974 0.006917 0.000101 0.047701 0.006178 0.017844 0.003306 0.001975 0.004352 0.005159 0.012454 0.000284 0.000256 0.2502905 0.0316408 0.1694207 0.1295767 0.2009441 0.0542414 0.1556929																										
PM2.5							0.0001531 0.0001732 0.0023948 0.0017938 0.00001265 0.00218506 0.00154451 0.00077581 0.00025434 0.00098734 0.00072531 0.00016121 0.00083027 0.00007105 0.00018221 0.01251403 0.00287644 0.00941226 0.00417989 0.00515113 0.01084828 0.06404718																										
Segments Q-W																																	







approximate quadrangle location



Source: Base map adapted from USGS 7.5 minute series, Cantonment, FLA Quadrangle, 1994.

**Figure 7-1**  
**Land-Use of Area**  
**Surrounding the IP Pensacola Mill**

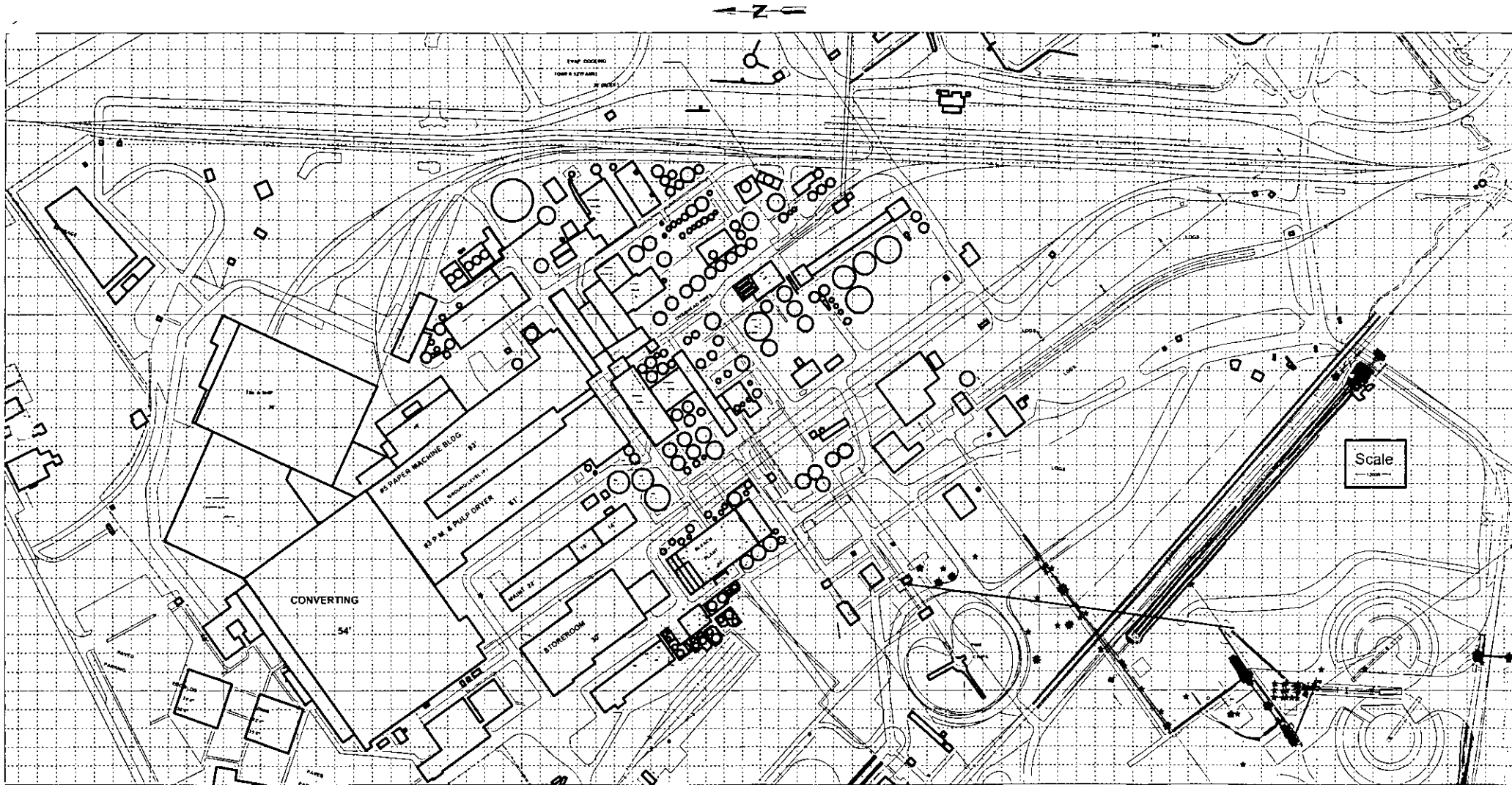

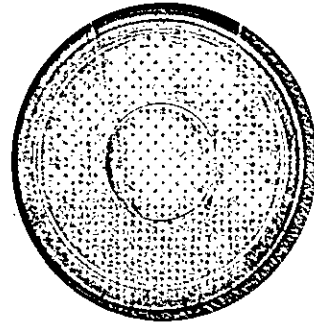


Figure D-2  
 IP Pensacola Mill  
 Facility Plot Plan

INTERNATIONAL  PAPER  
Pensacola, Florida  
Air Quality Modeling Files



July 2003

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