



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

January 23, 2006

CERTIFIED MAIL - Return Receipt Requested

Mr. Joel Bolduc
Environmental Supervisor
International Paper
Pensacola Mill
375 Muscogee Road
Cantonment, Florida 32533-0087

Re: Air Permit No.: 0330042-007-AC
International Paper - Pensacola Mill

Dear Mr. Bolduc:

On November 15, 2005, the Department received your letter dated November 10, 2005, from our Northwest District office, which requested withdrawal of the above referenced air construction permit (AC) and reversion back to the conditions established in the most current Title V permit, No. 0330042-009-AV. In the letter, you acknowledged completing some of the work authorized in the AC. Before we can make any conclusion, please provide the following information:

1. In detail, describe exactly what work has been completed as authorized by the AC.
2. Explain how the work that was performed affected the operation of the emissions unit.
3. Did the change affect any pollutant emissions? If so, which pollutants were affected and by how much?
4. Describe the original purpose and intent of Project No. 0330042-007-AC as well as pending Project No. 0330042-008-AC/PSD-FL-335. What is your plan for pending Project No. 0330042-008-AC/PSD-FL-335?

I look forward to your response. If you have any questions regarding this matter, please call Bruce Mitchell at 850/413-9198 or Jeff Koerner at 850/921-9536 or write to me at the above letterhead address.

Sincerely,

Ms. Trina L. Vielhauer
Chief
Bureau of Air Regulation

cc: Ms. Sandra Veazey, NWD

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1/6/06

Jeff,

We issued an AC, No. 0330042-007-AC, to International Paper to establish various mill operations's capacities in order to allow some physical changes to be made, but avoid PSD NSR scrutiny during Phase I of the mill's planned modification to increase production by 150 ADTP/day. The original AC was issued on 07/23/2003, with an expiration date of 04/30/05. The expiration date was extended, by request, to 04/30/07.

The permit authorized the following:

1. modification to the Kamyr Digester (continuous digester) – replacement of the existing straight-slotted extraction screens with diagonal-slotted extraction screens:

The replacement screens were installed at the wash section in the digester and designed to improve washing at the bottom of the digester. The mill claims that the replacement extraction screens did not increase pulping capacity or pulping rate, but only improved pulp quality and reduced energy consumption.

2. addition of a new causticizer with piping to the causticizing/lime production operations;

3. installation of two (2) medium consistency pumps for the pine O2 Delignification and Bleach Plant area.

The permit restricted the following processes/operations:

1. Kamyr (continuous) Digester System: production shall not exceed 271,985 ADTBP/yr nor 293,744 ADTUP/yr;

2. Causticizing Operations – lime production shall not exceed 155,108 tons CaO/yr;

3. Pine O2 Delignification and Bleach Plant:

A-Line (softwood): bleach plant production shall not exceed 245,030 ODP/yr;

B-Line (hardwood): bleach plant production shall not exceed 239,677 ODP/yr.

4. Batch Digester System – production shall not exceed 266,042 ADTBP/yr.

5. Recovery Boiler Operations (Nos. 1 and 2) – BLS firing shall not exceed 941,560 TPY.

ADTP: air dried tons pulp;

ADTBP: air dried tons bleached pulp;

ADTUP: air dried tons unbleached pulp;

ODP: oven dried pulp;

BLS: black liquor solids.

A letter from IP was received by the NWD on November 14, 2005, stating that they never undertook any work necessary to achieve any pulping increases nor do they plan to do so; and, they are requesting that AC permit, No. 0330042-007-AC, be terminated. They do acknowledge that the extraction replacement screens were done. Based on this and the mill's change in plans to alter their product lines, IP is requesting an interpretation that the AC is no longer valid and the mill can revert back to the conditions and limitations contained in their current Title V permit.

Bruce