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MAY 15 2002



BUREAU OF AIR REGULATION

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

May 9, 2002

RE: Clean Air Act Section 112(j) Notification Letter

Ms. Cindy Phillips, P. E.
FDEP Bureau of Air Regulation
MS5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Ms. Phillips:

Per Scott Sheplak's letter of April 5, 2002 (attached), International Paper submits this letter of notification to comply with the requirements of Section 112(j) of the Clean Air Act (CAA).

Also enclosed please find the "Part 1 Application for Case-by-Case MACT Determination" which was developed by International Paper to satisfy the requirements of Clean Air Act Section 112(j) and 40 CFR §§ 63.50-63.56.

(1) Facility Information:

International Paper, Pensacola Mill
375 Muscogee Road
Cantonment, FL 32533

Facility ID No.: 0330042

Facility Description: An integrated, bleached kraft, pulp and paper mill producing approximately 1500 tpd.

(2) Source Category	(3) Emitting Units belonging to this Source Category	E. U. No.
Industrial, Commercial and Institutional Boilers and Indirect-fired Process Heaters	Power Boiler 3	033
	Power Boiler 4	037
	Power Boiler 5	002
	Power Boiler 6	003

(4) No section 112(g) MACT determinations have been made for any affected sources at this facility.

International Paper requests an applicability determination for the following emitting units at the Pensacola Mill.

Source Category	Emitting Unit or Process	E. U. No.
Misc. Organic Chemical Production and Processes (MON)	Tall Oil Processing	001
Paint Stripping Operations	Maintenance painting and associated surface preparation is conducted at the site as needed for facility upkeep including scraping, abrasive blasting and stripping with chemical agents.	NA
Misc. Metal Parts and Products (Surface Coating)	Maintenance painting and associated surface preparation is conducted at the site as needed for facility upkeep including scraping, abrasive blasting and stripping with chemical agents.	NA

If you have any questions or require any additional information please contact Jim Spahr at (850) 968-2121 x3833.

Sincerely,



Ms. Nicki Slusser
Mill Manager
International Paper Company

cc: Mr. Doug Neely
Air, Pesticides and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8690

Encl: 2

**Part 1 Application for Case-by-Case MACT Determination
Pursuant to Clean Air Act Section 112(j) and 40 CFR §§ 63.50-63.56**

1. **Company Name:** International Paper
2. **Mailing Address:** 375 Muscogee Road
Cantonment, FL 32533
3. **Name of Major Source:** Pensacola Facility, ID No. 0330042
4. **Location of Major Source:** Cantonment, FL
5. **Description of Major Source:** Integrated, bleached kraft, pulp and paper facility producing approximately 1500tpd.
6. **Applicable Section 112 Source Category:** See Table 1.
7. **Types of sources belonging to the relevant source category present at the major source:** See Table 1.
8. **Affected sources at the major source for which a section 112(g) MACT determination has been made:** None
9. Pursuant to 40 CFR 63.52(e)(2)(ii), this source requests a determination that the section 112(g) MACT determination made for the above referenced affected source(s) is substantially as effective as the emission limitations which would otherwise be adopted pursuant to section 112(j) for the source(s) in question.
 Yes No **Not Applicable**
10. Pursuant to 40 CFR 63.52(d)(1) and 63.52(e)(2)(i), this source requests the Florida Department of Environmental Protection to determine whether the following sources belong in a category or subcategory for which the Administrator has failed to promulgate an emission standard under this part: (Identify the emissions units and the source category for which an applicability determination is requested.) (1) Misc. Organic Chemical Production and Processes (MON) Emitting Unit 001. (2) Paint Stripping Operations. (3) Misc. Metal Parts and Products (Surface Coating)

I certify, based on information and belief, formed after a reasonable inquiry that the above information is true, accurate, and complete.

Nicki Slusser
Nicki Slusser
Mill Manager
Responsible Official for International Paper's Pensacola Mill

5/13/02
Date

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BUREAU OF AIR REGULATION

**Part 1 Application for Case-by-Case MACT Determination
Pursuant to Clean Air Act Section 112(j) and 40 CFR §§ 63.50-63.56**

**Table 1
Applicable Section 112 Source Categories**

The following table shows all source categories and identifies those for which the Pensacola Mill has made a determination that one or more sources at the facility belong in the category. For those checked categories, the types of sources belonging to the relevant source category are described.

Category	Applicable?	Types of sources belonging to the relevant source category (provide a general description of the types of units regulated under this source category; note this does not require a listing of all emissions units at the facility.)
Combustion Turbines	<input type="checkbox"/>	
Engine Test Facilities and Rocket Testing Facilities	<input type="checkbox"/>	
Boilers and Process Heaters <ul style="list-style-type: none"> ▪ Industrial Boilers ▪ Institutional/Commercial Boilers ▪ Process Heaters 	<input checked="" type="checkbox"/>	Natural gas, coal, oil and carbonaceous fuel fired power boilers.
Lightweight Aggregate	<input type="checkbox"/>	
Reciprocating Internal Combustion Engines	<input type="checkbox"/>	
Primary Copper Smelting	<input type="checkbox"/>	
Primary Magnesium Refining	<input type="checkbox"/>	
Coke Ovens: Pushing, Quenching and Battery Stacks	<input type="checkbox"/>	
Integrated Iron and Steel Manufacturing	<input type="checkbox"/>	
Iron Foundries	<input type="checkbox"/>	
Steel Foundries	<input type="checkbox"/>	
Asphalt Roofing Manufacturing and Asphalt Processing	<input type="checkbox"/>	
Asphalt/Coal Tar Application to Metal Pipes (subsumed with Misc. Metal Parts & Products)	<input type="checkbox"/>	
Brick and Structural Clay Products Manufacturing/Clay Minerals Processing	<input type="checkbox"/>	
Lime Manufacturing	<input type="checkbox"/>	
Refractories Manufacturing (formerly Chromium Refractories)	<input type="checkbox"/>	
Taconite Iron Ore Processing	<input type="checkbox"/>	
Organic Liquids Distribution (Non- Gasoline)	<input type="checkbox"/>	
Auto and Light Duty Truck (Surface Coating).	<input type="checkbox"/>	
Large Appliance (Surface Coating)	<input type="checkbox"/>	
Metal Can (Surface Coating)	<input type="checkbox"/>	
Metal Coil (Surface Coating)	<input type="checkbox"/>	
Metal Furniture (Surface Coating)	<input type="checkbox"/>	
Miscellaneous Metal Parts and Products (Surface Coating)	<input type="checkbox"/>	
Paper and Other Webs (Surface Coating).	<input type="checkbox"/>	
Plastic Parts and Products (Surface Coating)	<input type="checkbox"/>	
Printing, Coating, and Dyeing of Fabrics.	<input type="checkbox"/>	

**Part 1 Application for Case-by-Case MACT Determination
Pursuant to Clean Air Act Section 112(j) and 40 CFR §§ 63.50-63.56**

Category	Applicable?	Types of sources belonging to the relevant source category (provide a general description of the types of units regulated under this source category; note this does not require a listing of all emissions units at the facility.)
Wood Building Products (Surface Coating) (formerly Flat Wood Paneling)	<input type="checkbox"/>	
Municipal Solid Waste Landfills	<input type="checkbox"/>	
Site Remediation	<input type="checkbox"/>	
Vegetable Oil Production	<input type="checkbox"/>	
Cellulose Production Manufacturing <ul style="list-style-type: none"> ▪ Cellulose Ethers Production ▪ Caroxymethylcellulose Production ▪ Cellulose Ethers Production ▪ Cellulose Food Casing Manufacturing ▪ Cellophane Production ▪ Methylcellulose Production ▪ Rayon Production 	<input type="checkbox"/>	
Miscellaneous Organic NESHAP <ul style="list-style-type: none"> ▪ Alkyd Resins Production ▪ Ammonium Sulfate Production--Caprolactam By-Product Plants ▪ Maleic Anhydride Copolymers Production ▪ Manufacture of Paints, Coatings and Adhesives ▪ Polyester Resins Production ▪ Polymerized Vinylidene Chloride Production ▪ Polymethyl Methacrylate Resins Production ▪ Polyvinyl Acetate Emulsions Production ▪ Polyvinyl Alcohol Production ▪ Polyvinyl Butyral Production ▪ Benzyltrimethylammonium Chloride Production ▪ Carbonyl Sulfide Production ▪ Chelating Agents Production ▪ Chlorinated Paraffins Production ▪ Ethylidene Norbornene Production ▪ Explosives Production ▪ Hydrazine Production ▪ OBPA/1,3-Diisocyanate Production ▪ Photographic Chemicals Production ▪ Phthalate Plasticizers Production ▪ Rubber Chemicals Manufacturing ▪ Symmetrical Tetrachloropyridine Production ▪ Quaternary Ammonium Compounds Production 	<input type="checkbox"/>	
Polyvinyl Chloride and Copolymers Production	<input type="checkbox"/>	
Reinforced Plastic Composites Production	<input type="checkbox"/>	
Generic MACT Categories Carbon Black Production Spandex Production Cyanide Chemicals Manufacturing Ethylene Processes	<input type="checkbox"/>	
Mercury Cell Chlor-Alkali Plants (Formerly	<input type="checkbox"/>	

**Part 1 Application for Case-by-Case MACT Determination
Pursuant to Clean Air Act Section 112(j) and 40 CFR §§ 63.50-63.56**

Category	Applicable?	Types of sources belonging to the relevant source category (provide a general description of the types of units regulated under this source category; note this does not require a listing of all emissions units at the facility.)
Chlorine Production)		
Hydrochloric Acid Production and Fumed Silica Production	<input type="checkbox"/>	
Flexible Polyurethane Foam Fabrication Operations	<input type="checkbox"/>	
Friction Materials Manufacturing	<input type="checkbox"/>	
Miscellaneous Viscose Processes	<input type="checkbox"/>	
Paint Stripping Operations	<input type="checkbox"/>	
Plywood and Composite Wood Products (formerly Plywood and Particle Board Manufacturing)	<input type="checkbox"/>	
Rubber Tire Manufacturing	<input type="checkbox"/>	
Semiconductor Manufacturing	<input type="checkbox"/>	
Wet-Formed Fiberglass Mat Production	<input type="checkbox"/>	



Department of Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

April 5, 2002

To the Title V Air Permitting Contact Person:

Our records indicate that your facility may be a major source of hazardous air pollutants and may be in the affected **Industrial, Commercial & Institutional Boilers and Indirect-fired Process Heaters** source category. Therefore, you must notify us by **May 15, 2002** if you think your facility is a major source of hazardous air pollutants and is in an affected industry type source category. A list of affected industry type source categories is printed on the reverse side of this letter.

The Clean Air Act (CAA), as amended in 1990, requires that the USEPA publish federal regulations by May 15, 2002 to determine the maximum achievable control technology (MACT) to reduce emissions of hazardous air pollutants (HAPs) from certain industry type source categories at facilities that emit major amounts of hazardous air pollutants. A major amount of hazardous air pollutants is considered to be 10 tons per year or more of a single hazardous air pollutant, or 25 tons per year or more of a combination of hazardous air pollutants. However, the USEPA is not likely to publish the federal MACT regulations until May 15, 2004 instead of May 15, 2002, the MACT "hammer" date. As a result, Section 112(j) of the Clean Air Act must be initiated.

If you think your facility is a major source of hazardous air pollutants and is in an affected industry type source category, you must submit to our office and the USEPA by **May 15, 2002** the following **112(j) notification information**, which may be in letter format:

- (1) The name, address (physical location), and brief description of the major source (facility);
- (2) An identification of the relevant industry type source category(ies) [See list on reverse side of this letter.];
- (3) A list of the emission units belonging to the relevant industry type source category(ies); and
- (4) An identification of any affected sources for which a section 112(g) MACT determination has been made.

This submittal must be signed by the Title V permit Responsible Official. The mailing addresses for the 112(j) contacts at our office and the USEPA are:

Ms. Cindy Phillips, P.E.
FDEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Mr. Doug Neeley
Air, Pesticides, and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8960

This notification requirement does not affect the processing of any Title V permits that are undergoing renewal now or in the near future. Any newly applicable NESHAP requirements that may be promulgated by May 2004 will be incorporated into your Title V permit through the procedures specified in 40 CFR 70.7 (f), *Reopening for cause*. As before, any new construction or reconstruction that, by itself, will emit a major amount of hazardous air pollutants, will likely require a 112(g) Case-by-case MACT determination during the construction permitting process.

If you have any questions, please contact Ms. Cindy Phillips at 850-921-9534 or Cindy.Phillips@dep.state.fl.us.

Sincerely,


Scott M. Sheplak, P.E. Administrator

Title V Section, Bureau of Air Regulation "More Protection, Less Process"

AFFECTED INDUSTRY TYPE SOURCE CATEGORIES

NESHAP NOT PROPOSED YET

- Auto & Light Duty (Surface Coating)
- Brick & Structural Clay Products Mfg.
- Combustion Turbines
- Fabric Printing, Coating, and Dyeing
- Industrial, Commercial and Institutional Boilers
and Indirect-fired Process Heaters
- Iron Foundries
- Lime Manufacturing
- Mercury Cell Chlor-Alkali Plants
- Metal Can (Surface Coating)
- Metal Furniture (Surface Coating)
- Misc. Metal Parts and Products (Surface Coating)
- Misc. Organic Chemical Production and Processes (MON)
- Organic Liquids Distribution (non-gasoline)
- Paint Stripping Operations
- Plastic Parts (Surface Coating)
- Plywood and Composite Wood Products
- Primary Magnesium Refining
- Reciprocating Internal Combustion Engines (RICE)
- Refractory Products Manufacturing
- Rocket Testing Facilities & Engine Test Cells/Standards
- Semiconductor Production
- Site Remediation
- Taconite Iron Ore Processing
- Wood Building Products (Surface Coating)

NESHAP PROPOSED BUT NOT FINAL YET

- Asphalt Roofing & Processing
- Cellulose Ethers Production Manufacturing
- Coke Oven: Pushing, Quenching, & Battery Stacks
- Flexible Polyurethane Foam Fabrication Operation
- Friction Materials Manufacturing
- Generic MACT
- Hydrochloric Acid Production
- Integrated Iron & Steel
- Large Appliance (Surface Coating)
- Metal Coil (Surface Coating) Industry
- Miscellaneous Viscose Processes
- Municipal Solid Waste Landfills
- Paper & Other Web (Surface Coating)
- Petroleum Refineries
- Polyvinyl Chloride and Copolymers Production
- Primary Copper
- Reinforced Plastics Products Manufacturing
- Tire Manufacturing
- Wet-Formed Fiberglass Mat Production



Department of Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

June 13, 2002

Ms. Nicki Slusser
Mill Manager
Pensacola Mill
International Paper Company
375 Muscogee Road
P.O. Box 87
Cantonment, FL 32533-0087

Re: Request for Determination of MACT Applicability

Dear Ms. Slusser:

In response to your letter received May 15, 2002 which requests that the Department make a determination of MACT applicability for your plant, I have attached Chapter 28-105, F.A.C., Declaratory Statements, which specifies the procedure that you must follow in order for us to comply with your request.

The Department's Agency Clerk is Kathy Carter. Her address is:

Kathy Carter, Agency Clerk
Florida Department of Environmental Protection
MS 35
3900 Commonwealth Boulevard
Tallahassee FL 32399-3000

Thank you for submitting the 112(j) notification information. Your information submittal appears to meet our current 112(j) requirements.

Please be aware that, although your letter refers to this information submittal as an "application," the Department does not recognize your submittal as a state permit application and has no plans to process it as such.

No further 112(j) information is needed from you at this time. If you have any questions, concerning this matter, please contact me at 850/921-9534.

Sincerely,

Cindy L. Phillips, P.E.
Bureau of Air Regulation

attachment

"More Protection, Less Process"

Printed on recycled paper.

CHAPTER 28-105, F.A.C.

DECLARATORY STATEMENTS

28-105.001 Purpose and Use of Declaratory Statement.

A declaratory statement is a means for resolving a controversy or answering questions or doubts concerning the applicability of statutory provisions, rules, or orders over which the agency has authority. A petition for declaratory statement may be used only to resolve questions or doubts as to how the statutes, rules, or orders may apply to the petitioner's particular circumstances. A declaratory statement is not the appropriate means for determining the conduct of another person or for obtaining a policy statement of general applicability from an agency. A petition for declaratory statement must describe the potential impact of statutes, rules, or orders upon the petitioner's interests.

28-105.002 The Petition.

A petition seeking a declaratory statement shall be filed with the clerk of agency that has the authority to interpret the statute, rule, or order at issue and shall provide the following information:

(1) The caption shall read:

Petition for Declaratory Statement

Before (Name of Agency)

(2) The name, address, telephone number, and any facsimile number of the petitioner.

(3) The name, address, telephone number, and any facsimile number of the attorney or qualified representative (if any) of the petitioner.

(4) The statutory provision(s), agency rule(s), or agency order(s) on which the declaratory statement is sought.

(5) A description of how the statutes, rules, or orders may substantially affect the petitioner in the petitioner's particular set of circumstances.

(6) The signature of the petitioner or of the petitioner's attorney or qualified representative.

(7) The date.

28-105.003 Agency Disposition.

The agency may hold a hearing to consider a petition for declaratory statement. If the agency is headed by a collegial body, it shall take action on a petition for declaratory statement only at a duly noticed public meeting. If a hearing is held, it shall be conducted in accordance with Sections 120.569 and 120.57(2), F.S. The agency may rely on the statements of fact set out in the petition without taking any position with regard to the validity of the facts. Within 90 days of the filing of the petition, the agency shall render a final order denying the petition or issuing a declaratory statement.