

Stone Container Corporation  
Panama City Mill

TRS Venting Contingency Plan

**I. Introduction**

This plan has been developed in accordance with Section 17-2.600(4)(C)1.C, FAC which requires each facility that incinerates TRS gasses from digesting and multiple effect evaporator systems to develop contingency plans that address means of control or mitigation of emissions from these systems should the primary incineration device fail. Also addressed is incidental venting that may occur from a specific source in the TRS gas collecting system.

**II. Emissions Mitigation**

The TRS gas collection system at the Panama City Mill was designed and constructed with an alternative incineration device. The primary incineration device is the lime kiln (EU004). The alternate device is the No. 4 Bark Boiler (EU016). Should the lime kiln be inoperable due to a mechanical failure, or be taken out of service for maintenance, the TRS gasses will be directed to the No. 4 Bark Boiler. The transfer from the use of one incineration device to the other normally takes less than five (5) minutes.

**III. Back up Control**

The back up incineration device is the No. 4 Bark Boiler. The gasses are introduced into the flame zone, and are subjected to a minimum of 1,200 degrees F for at least 0.5 seconds. The boiler has a heat input capacity of greater than 150 MMBtu/hr, and complies with 40CFR60.283(a)(1)(iii). TRS compliance testing performed while incinerating TRS gasses in this boiler have shown that the boiler does an excellent job of destroying TRS gasses.

**IV. Incidental Venting**

In the event of a rupture disc failure or some other leak in the TRS gas collection and conveying system, the production equipment being served by this system will be shut down as expeditiously as possible so repairs can be made.

**V. Vent Reporting**

A log of NCG ventings to the atmosphere shall be maintained and available for inspection by the Department upon request. The log shall include, but is not limited to, the date and time, duration, cause, and corrective actions taken for each venting occurrence. Each venting occurrence shall be reported to the Department verbally or by e-mail by the next working day and a copy of the log entry submitted within 30 days, either by mail or e-mail.