


Memorandum

Florida Department of Environmental Protection

TO: Rita Felton-Smith
DEP Northeast District Office

FROM: Errin Pichard, Administrator 
Emissions Monitoring Section

DATE: August 28, 2006

SUBJECT: Smurfit-Stone Alternate Procedure Request

The Emissions Monitoring Section has reviewed the request submitted by Smurfit-Stone for the use of an alternate procedure to determine sulfur dioxide emissions. Specifically, the facility has requested approval to utilize fuel sampling to determine the sulfur content of the fuel being burned along with a mass balance calculation to determine sulfur dioxide emissions. This alternate procedure is allowed with prior department approval pursuant to DEP Rule 62-296.405(1)(e)3., F.A.C.

Because the proposed alternate procedure assumes that all sulfur in the fuel is converted to sulfur dioxide, the calculated emissions will be conservative compared to the emissions determined by a conventional stack test. For this reason, we agree that the proposed alternate procedure is acceptable.

If you have any questions, please call me at 850-921-9509.

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