



Fernandina Beach Containerboard Mill
North 8th Street
PO Box 2000
Fernandina Beach, FL 32035
(904) 261-5551
(904) 277-5888 fax

CERTIFIED MAIL

7004 0750 0003 3874 1500

✓ 7004 0750 0003 3874 1500

June 2, 2006

Mr. Errin Pichard, P.E.
Administrator, Emissions Monitoring Section
Florida Department of Environmental Protection (FDEP)
2600 Blair Stone Road
Tallahassee, FL 32399

**Re: Request for Alternate Procedure for Monitoring SO₂ Emissions –
Construction Permit No. AC45-194149, Title V Permit No. 0890003-001-AV**

The Smurfit-Stone Container Corporation Fernandina Beach Mill (Smurfit-Stone) is in the process of renewing its Title V Air Operating Permit No. 0890003-001-AV (AOP) with the Department's Northeast District office.

The No. 5 Power Boiler is a carbonaceous fuel boiler regulated under Rule 62-296.410, F.A.C. that is also permitted to burn No. 2 and No. 6 fuel oil under 62-296.405, F.A.C. Based on previous permitting activities, the No. 5 Power Boiler has an SO₂ limit of 2.5% sulfur content in the fuel oil. Our current Title V permit issued in 1998 specifies at condition A.8 that fuel oil analyses will be kept in lieu of stack testing.

FDEP's Northeast District has stated that if Smurfit-Stone wishes to continue its current practice of fuel sampling in lieu of stack testing, then an alternate procedure under the provisions of Rule 62-297.620 must be approved by your office. Smurfit-Stone believes that the current method of fuel sulfur records and the mass balance calculation provides a highly accurate and more conservative method for demonstrating compliance with this boiler's SO₂ emissions limits. Smurfit-Stone currently receives sulfur content data from the fuel oil supplier, analyzed by approved ASTM Method D4294, for each shipment received at the facility.

The purpose of this letter is to request Department approval to continue measuring SO₂ emissions using an alternate procedure under the provisions of FAC Rule 62-297.620, Exceptions and Approval of Alternate Procedures and Requirements. We propose that an alternate method of measuring SO₂ emissions by a conservative mass balance calculation using the total sulfur content in the No. 6 fuel oil. The following mass balance equation assumes that 100 percent of the sulfur in the fuel oil is converted to SO₂.

$$\text{S oil} \times 8.2 \text{ lb/gal} \times 2 \text{ lb SO}_2/\text{lb S} = (16.4 \times (\text{S lb}/100 \text{ lb oil})) \text{ lb SO}_2/\text{gal}$$
$$\text{lbs SO}_2/\text{hr} = (0.164 \times \text{S} \times \text{gals oil}) \quad \text{S} = \text{Sulfur content of oil in percent}$$

Smurfit-Stone hereby requests that fuel sulfur recordkeeping be approved for continued use as an alternative method of demonstrating compliance with the SO₂ emissions limits for the No. 5 Power Boiler. Please contact me at (904) 277-7746 or by email at bcrews@smurfit.com if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "William O. Crews", followed by a horizontal line.

William O. Crews
Environmental Manager

Cc: Mr. Christopher Kirts
Florida Department of Environmental Protection (FDEP)
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32056-7590