



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL  
PROTECTION

JUL 05 2006

4APT-ATMB

2006 JUL 10 A 6:55

William O. Crews  
Environmental Manager  
Smurfit-Stone Container Corp.  
North 8<sup>th</sup> Street  
Fernandina Beach, FL 32034

NORTHEAST DISTRICT  
JACKSONVILLE, FL

Dear Mr. Crews:

This is in response to your letter dated May 2, 2006, regarding Smurfit-Stone's baseline emission estimates for the clean condensate alternative (CCA), pursuant to the Pulp and Paper MACT regulation, 40 CFR 63, Subpart S. Previously, Smurfit-Stone had planned to use emission reduction credits from modifications to the brown stock washer system for CCA compliance purposes. Our response to this plan was that the modifications to the washer system were not "additional improvements in technology" as explained in the Environmental Protection Agency (EPA) memorandum titled "Clean Condensate Alternative for the Pulp and Paper National Emission Standards for Hazardous Air Pollutants" dated April 8, 2004, from Stephen Page, Director, Office of Air Quality Planning and Standards, to the EPA Regional Air Directors, and therefore could not be used as creditable emission reductions under the CCA. You have responded saying that if the emission reductions are not creditable reductions, then they must be incorporated into the baseline estimates for the CCA project evaluation. We concur with your assessment.

If you have any further questions, please contact Lee Page of the Region 4 staff at (404) 562-9131.

Sincerely,

R. Douglas Neeley  
Chief  
Air Toxics & Monitoring Branch  
Air, Pesticides and Toxics  
Management Division

cc: Chris Kirts, FDEP