



Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590

Colleen Castille
Secretary

PERMITTEE:

Buckeye Florida, Limited Partnership
One Buckeye Drive
Perry, Florida 32347

I.D. Number: 1230001
Permit/Cert Number: 1230001-018-AC
Date of Issue: February 16, 2005
Expiration Date: February 16, 2006
County: Taylor
Latitude/Longitude: 30° 03' 59" N; 83° 33' 12" W
UTM: E-(17) 256.7; N-3328.7
Project: No. 1 Power Boiler

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

PROJECT #018

Authorizes the use of the No. 1 Power Boiler (Emissions Unit 002) as the backup control device for NCG and TRS destruction for up to 960 hours per year. This is an increase from 480 hours per year authorized under Construction Permit No. 1230001-011-AC.

Noncondensable gases (NCGs) from the existing turpentine decanter, the turpentine underflow tank, and the digester accumulator lines are collected and tied into the existing Low Volume High Concentration (LVHC) gas collection system, then routed to the No. 1 Bark Boiler (primary device) or the pre-scrubber followed by the No. 1 Power Boiler (secondary/backup device for MACT) for combustion. TRS removal by the pre-scrubber has been confirmed by inlet and outlet testing to be least 50%.

Because the pre-scrubber will be operated as a permanent part of the backup LVHC control system, the increase in the allowable hours of NCG burning in the No. 1 Power Boiler will not result in an increase in SO₂ or SAM emissions. Estimates of HAP emissions have increase slightly over the values presented in the July 2000 MACT I permit application due to updated NCASI factors. TRS annual emissions have increased due to the increase in the allowable hours of NCG burning. The net emissions changes based on the revised LVHC NCG combustion conditions for the No. 1 Power Boiler are summarized in the table below.

In addition, in this permit, the Department corrects the rule citation in Specific Condition 4.b of Construction Permit No. 1230001-011-AC, as in incorrectly cites 40 CFR 60.283(a)(1)(iii) as the basis of the condition. None of the sources venting to the LVHC system (i.e., batch digester system, multiple effect evaporator system, and the turpentine system) are subject to 40 CFR 60 Subpart BB.

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Buckeye is required to continuously monitor and record the Total Reduced Sulfur (TRS) emissions incineration temperature at the No. 1 Bark Boiler. This requirement is based on an agreement between Mr. C.S. Aiken, Plant Manager of The Procter & Gamble Cellulose Company (Buckeye's predecessor), and the Bureau of Air Regulation. It was summarized in the Construction Permit Amendment letter for No. 1 Bark Boiler, dated May 17, 1990.

Because the No. 1 Power Boiler is the backup control device to the No. 1 Bark Boiler for TRS emissions, the TRS requirements are now consistent between the two boilers.

This permit also reduces the permitted TRS emissions at the No. 1 Bark Boiler based on the amended construction permit application pages received October 5, 2004.

Summary of the net emissions changes based on the revised LVHC NCG combustion conditions for the No. 1 Power Boiler (as a secondary control device):

		Pollutants Emission Rate (TPY)							
		SO2	NOx	CO	PM/P M10	TRS	VOC	SAM	HAPs
Total Proposed Modifications	<ul style="list-style-type: none"> No. 1 Power Boiler as backup/secondary device and firing natural gas w/existing TRS scrubber as preliminary control device (MODE 1)* 	124.1	---	---	---	1.09	---	7.6	0.22
	<ul style="list-style-type: none"> No. 1 Power Boiler as backup/secondary device and firing fuel oil w/ existing TRS scrubber as preliminary control device (MODE 2)* 	124.1	---	---	---	1.09	---	7.6	0.22
Existing Emissions	<ul style="list-style-type: none"> No. 1 Power Boiler as backup/secondary device for LVHC NCG gases 	0	---	---	---	0	---	0	0
	<ul style="list-style-type: none"> Backup TRS⁺ Scrubber for LVHC NCG gases at the No. 1 Bark Boiler 	---	---	---	---	50	---	0	5.9
Total of Existing Emissions		0	---	---	---	50	---	0	5.9
TOTAL NET CHANGE		124.1 ⁺⁺	---	---	---	-48.9	---	7.6 ⁺⁺	-5.7

* The No. 1 Power Boiler is the backup combustion device to comply with MACT I requirements for control of LVHC gases. It will be operated in either of two modes.

Mode 1: The No. 1 Power Boiler is the backup TRS combustion device while burning natural gas and LVHC. LVHC NCG gases are routed to the existing TRS scrubber (previously used at the No. 1 Bark Boiler) as a preliminary TRS control prior to combustion.

Mode 2: LVHC NCG gases will be routed to the existing TRS scrubber (previously used at the No. 1 Bark Boiler) as a preliminary TRS control, followed by combustion in the No. 1 Power Boiler during time periods when fuel oil and LVHC gases are burned in this boiler.

⁺ For existing emissions at the No. 1 Bark Boiler, the TRS Scrubber is the TRS Control backup control device

⁺⁺ Above Significant Threshold. A Pollution Control Project (PCP) Exclusion was granted pursuant to 62-212.400(2)(a)2.b.

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FACILITY DESCRIPTION

This facility is a dissolving Kraft mill that consists of major activities areas such as: wood handling facility, pulping system, purification, chemical recovery, power house, drying/ converting/ warehouse, associated processes and equipment, and unregulated emissions units.

OPERATING LOCATION

Located east of US 19, south of SR 30, southeast of Perry, Taylor County.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Air Construction Permit No. 1230001-011-AC
Application For Air Permit received April 28, 2004
Additional Information Received October 5, 2004
Comments from Applicant received January 4, 2005

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GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys not title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permitted to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any record that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

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GENERAL CONDITIONS:

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of non-compliance; and
- b. The period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)
- () Compliance with National Emission Standards for Hazardous Air Pollutants/ Maximum Available Control Technology (MACT)

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GENERAL CONDITIONS:

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurement;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

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Subsection A. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
002	<p>No. 1 Power Boiler with emissions vented through a common stack with E.U. 002, 003, 004, and 019.</p> <p>This boiler serves as a backup destruction device for noncondensable gases (NCGs) from the sources required to be controlled by 40 CFR Part 63, Subpart S (MACT I) and State TRS regulations. The gases are routed to a pre-scrubber prior to entering the boiler for destruction. The boiler shall be operated in this mode for a period not to exceed 960 hours per year.</p>

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

- A.1. **Hours of Operation.** The hours of operation are not limited.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., Construction Permit No. 1230001-017-AC]
- A.2. **Permitted Capacity.** The maximum heat input rate is 249 MMBtu/hr.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., Construction Permit 1230001-017-AC]
- A.3. **Methods of Operation.** This boiler may be fired with the following fuels:
 1. Natural gas.
 2. No.6 fuel oil with a sulfur content that shall not exceed 2.5% by weight and may include facility generated used oil.
 3. No.2 fuel oil (typically used as a pilot fuel during startups, shutdowns, and malfunctions and for dry out fires after a water wash).
 4. NCGs during periods when the boiler is being utilized for their destruction. Such operation shall occur for a period not to exceed 960 hours per year.
 5. Facility-generated Tall Oil blended with No. 6 fuel oil. The sulfur content of the Tall Oil shall not exceed 0.05% by weight.

[Rule 62-213.410, F.A.C.; Rule 62-210.700, F.A.C.; Construction Permit No. 1230001-011-AC; Construction Permit No. 1230001-012-AC, Construction Permit No. 1230001-017-AC]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

{Permitting Note: Unless otherwise specified, the averaging time for these conditions is based on the specified averaging time of the applicable test method.}

- A.4. **Particulate Matter Emissions.** Particulate Matter emissions shall not exceed 47.9 lbs/hr and 209.96 TPY.
[Rule 62-296.406(2), F.A.C.; Rule 62-210.200(42), F.A.C.; BACT Determination dated 01-25-90; Construction Permit 1230001-017-AC]

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SPECIFIC CONDITIONS:

- A.5. Sulfur Dioxide Emissions.** Sulfur Dioxide emissions shall be limited to a maximum sulfur content of 2.5%, by weight and 671.9 lbs/hr and 2943.18 TPY.
[Rule 62-296.406(3), F.A.C.; Rule 62-210.200(42), F.A.C.; BACT Determination dated 01-25-90; Construction Permit 1230001-017-AC]
- A.6. Total Reduced Sulfur (TRS) Emissions.** When NCG gases are collected and routed to this Emissions Unit, TRS emissions shall not exceed 5 ppmvd @ 10% O₂, as a 12 hour average; 2.28 lbs/hr and 1.1 TPY. TRS Emissions shall be incinerated for a minimum of 0.5 second and at a minimum of 1200°F.
[Rule 62-296.404(3)(f)1., F.A.C.; Construction Permit No. 1230001-011-AC; Construction Permit No. 1230001-012-AC]
- A.7. Visible Emissions.** Visible Emissions shall not exceed 20% opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent.

Visible emissions limits for Kraft pulp mill emissions units equipped with wet scrubbers shall be effective only if the visible emission measurement can be made without being substantially affected by moisture condensation. If the Department determines that visible emissions exceed 20 percent opacity, a special compliance test may be required in accordance with Rule 62-297.310(7)(b), F.A.C.

[Rule 62-296.406(1), F.A.C.; Rule 62-296.404(2)(b), F.A.C.; BACT Determination dated 01-25-90; Construction Permit 1230001-017-AC]

TEST METHODS AND PROCEDURES

- A.8. Sulfur Dioxide.** The permittee shall conduct sulfur dioxide emissions compliance test upon request by the Department in accordance with the requirements of Rule 62-297.310(7)(b), F.A.C. The test Method shall be EPA Method 6 incorporated and adopted by reference in Chapter 62-297, F.A.C. At all other times, compliance with the emission limit shall be demonstrated by complying with **Specific Condition A.12.**
[Rules 62-297.401(6), F.A.C.; Construction Permit No. 1230001-017-AC]
- A.9. Sulfur Content in Tall Oil.** The Permittee shall verify the sulfur content of the Tall oil by using appropriate testing methods on a quarterly basis. These records shall be maintained and reported on an annual basis.

¹Testing required only if Tall Oil is fired during the quarter.

[Construction Permit No. 1230001-017-AC]

- A.10. TRS Emissions.** The test method for total reduced sulfur shall be EPA Method 16, or 16A incorporated and adopted by reference in Chapter 62-297, F.A.C. A compliance test shall be conducted prior to operation permit renewal during the federal fiscal year.

{Permitting Note: Buckeye shall use 80,000 acfm (design) to determine the lb/hr value in the event that an actual velocity measurement cannot be obtained during compliance testing}

[Rules 62-296.404(4)(e)3., 62-297.310(7)(a)1., (7)(a)3., (7)(a)4.b. F.A.C., 62-297.401(16), F.A.C.; Construction Permit No. 1230001-017-AC]

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SPECIFIC CONDITIONS:

A.11. Visible Emissions. The test method for VE shall be DEP Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C., and shall be performed once each federal fiscal year. Visible emissions limits for Kraft pulp mill emissions units equipped with wet scrubbers shall be effective only if the visible emission measurement can be made without being substantially affected by moisture condensation. If the Department determines that visible emissions exceed 20 percent opacity, a special compliance test may be required in accordance with Rule 62-297.310(7)(b), F.A.C.
[Rule 62-296.404(2)(b), F.A.C.; Rule 62-297.401(9)(c), F.A.C.; Construction Permit No. 1230001-017-AC]

COMPLIANCE MONITORING

A.12. Particulate Matter and Sulfur Dioxide Emissions. In lieu of stack testing, a record shall be maintained of acceptable fuel oil analyses of all fuel oil received for at least a five-year period. This information shall be reported annually.

When fuel oil or a Tall Oil/fuel oil blend is fired in this power boiler, compliance with the permit limits (in lbs/hr) shall be determined by using the fuel oil or Tall Oil/fuel oil blend usage rate [the average for each contiguous 3-hour period (i.e., 0000-0300; 0300-0600; etc.)], fuel oil sulfur content and EPA matter emissions factors to calculate the particulate matter emissions and SO₂ emissions since the particulate matter and SO₂ are a function of fuel oil sulfur content. The equations are:

1. $[[9.19 (S) + 3.22]/1000] \times \text{Fuel Oil/Tall Oil Usage [gallons per hr (3-hr avg)]} = \text{lbs PM per hour}$
2. $[[157 (S)]/1000] \times \text{Fuel Oil/Tall Oil Usage [gallons per hr (3-hr avg)]} = \text{lbs SO}_2 \text{ per hour}$

where S = weight percent sulfur (i.e., if 2.5%, insert 2.5)

{Permitting Note: The 3-hour averaging period is consistent with the manual stack test methods (when applicable), which are normally conducted as three separate 1-hour runs and averaged to determine compliance.}

[Permit No. AO62-230933; Construction Permit 1230001-017-AC]

A.13. TRS Pre-Scrubber Parameter Monitoring. Weak wash, from the lime mud washing system, (scrubbing media), shall be continuously added to the pre-scrubber at a minimum of 50 gallons per minute based on a 3-hour average. This flow set point shall be continuously monitored and verified on an annual basis. Monitoring records shall be maintained and available for inspection by the Department.

EXCESS EMISSIONS

A.14. Excess Emissions. Excess emissions resulting from startup, shutdown, or malfunction of any emission units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 8 hours in any 24-hour period unless specifically authorized by the Department for longer duration.

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision.}

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A.15. Periods of excess emissions reported under 40 CFR Part 63, Subpart A shall not be a violation of 40 CFR 63.443(c) and (d), provided that the total time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed 4% for the No. 1 Power Boiler and No. 1 Bark Boiler combined.

[40 CFR 63.443(e)3; Construction Permit No. 1230001-011-AC; Construction Permit No. 1230001-012-AC, Construction Permit No. 1230001-017-AC]

CONTINUOUS MONITORING REQUIREMENTS

A.16. TRS Emissions. Total Reduced Sulfur (TRS) emissions incineration temperature shall be continuously monitored and recorded.

[Rule 62-296.404(5)(c), F.A.C.; Construction Permit No. 1230001-017-AC]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.17. Total Reduced Sulfur (TRS). The Permittee shall submit a Total Reduced Sulfur (TRS) emissions and surrogate parameter data report to the Department postmarked by the 30th day following the end of each calendar quarter. The report shall comply with the requirements of Rule 62-296.404(6), F.A.C.

[Rule 62-296.404(6), F.A.C.; Construction Permit No. 1230001-017-AC]

A.18. This emissions unit is also subject to Common Conditions C.1.- C.14.

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SPECIFIC CONDITIONS:

Subsection B. The following specific conditions apply to the emissions unit listed below:

Emissions Unit No.	<u>Description</u>
004	No. 1 Bark Boiler

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

B.1. Hours of Operation: The hours of operation are not limited.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1230001-017-AC]

B.2. Permitted Capacity: Permitted Capacity. The maximum heat input rate is 300 MMBtu/hr.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1230001-017-AC]

B.3. Methods of Operation. This boiler may be fired with the following fuels:

1. Carbonaceous Fuel consisting of wood materials such as bark, chips, sawdust and other such wood fiber material.
2. No. 6 fuel oil with a sulfur content that shall not exceed 2.5% by weight (which may contain facility generated used oil) fired as primary fuel and during startups, shutdowns, malfunctions or temporary loss of bark.
3. No. 2 fuel oil fired typically as a pilot fuel during startups, shutdowns, malfunctions and for dry out fires after a water wash. Sulfur content that shall not exceed 0.5% by weight.
4. Natural gas fired typically as a pilot fuel during startups, shutdowns, malfunctions and for dry out fires after a water wash.
5. NCGs during periods when the boiler is being utilized for their destruction.
6. Facility-generated Tall Oil blended with No. 6 fuel oil. The sulfur content of the Tall Oil shall not exceed 0.05% by weight.

[Rule 62-213.410, F.A.C.; Rule 62-210.700, F.A.C.; Permit No. AC62-141927; Construction Permit No. 1230001-011-AC; Construction Permit No. 1230001-012-AC; Construction Permit No. 1230001-017-AC]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

{Permitting Note: Unless otherwise specified, the averaging time for these conditions is based on the specified averaging time of the applicable test method.}

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B.4. Particulate Matter Emissions. Particulate Matter emissions shall not exceed the following:

when firing only carbonaceous fuel:

0.158 lb/MMBtu and 207 TPY

when firing only No. 6 fuel oil or Tall Oil/Fuel Oil blend:

0.1 lb/MMBtu or 24.0 lb/hr

[Construction Permit No. 1230001-017-AC]

B.5. Sulfur Dioxide Emissions. Sulfur Dioxide emissions shall be limited to a maximum sulfur content of 2.5% by weight, in the No. 6 fuel oil and 675.1 lbs/hr and 2957 TPY.

[Permit No. AC62-141927; Construction Permit No. 1230001-017-AC]

B.6. Total Reduced Sulfur (TRS) Emissions. Total Reduced Sulfur emissions shall not exceed 5 ppmvd @ 10% O₂ as a 12-hour average; 2.43 lbs/hr (based on the test method time period) and 10.64 TPY. TRS Emissions shall be incinerated for a minimum of 0.5 second and at a minimum of 1200°F.

[Rule 62-296.404(3)(f)1., F.A.C.]

B.7. Visible Emissions. Visible emissions shall not exceed 30% opacity, except that up to 40% Opacity is permissible for not more than 2 minutes in any one hour.

Visible emissions limits for Kraft pulp mill emissions units equipped with wet scrubbers shall be effective only if the visible emission measurement can be made without being substantially affected by moisture condensation. If the Department determines that visible emissions exceed 20 percent opacity, a special compliance test may be required in accordance with Rule 62-297.310(7)(b), F.A.C.

[Rule 62-296.410(1)(b)1., F.A.C.; Rule 62-296.404(2)(b), F.A.C.; Construction Permit No. 1230001-017-AC]

TEST METHODS AND PROCEDURES

B.8. Particulate Matter Emissions. The test method for particulate matter emissions shall be EPA Method 5, incorporated and adopted by reference in Chapter 62-297, F.A.C. This compliance test shall be performed once each federal fiscal year.

[Rule 62-296.410(3), F.A.C.; Rules 62-297.401(5), F.A.C.; Permit No. AC62-141927; Construction Permit No. 1230001-017-AC]

B.9. Sulfur Dioxide Emissions. The test method for sulfur dioxide emissions shall be EPA Method 6 incorporated and adopted by reference in Chapter 62-297, F.A.C. This compliance test shall be performed once each federal fiscal year.

[Rule 62-297.401(6), F.A.C.; Permit No. AC62-141927; Construction Permit No. 1230001-017-AC]

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SPECIFIC CONDITIONS:

B.10. Sulfur Content in Tall Oil. The Permittee shall verify the sulfur content of the Tall oil by using appropriate testing methods on a quarterly basis. These records shall be maintained and reported on an annual basis.

¹Testing required only if Tall Oil is fired during the quarter.

[Construction Permit No. 1230001-017-AC]

B.11. TRS Emissions. The test method for total reduced sulfur emissions shall be EPA Method 16 or 16A incorporated and adopted by reference in Chapter 62-297, F.A.C. A compliance test shall be conducted prior to operation permit renewal during the federal fiscal year.
[Rule 62-297.401(16), F.A.C.; Permit No. AC62-141927; Rules 62-296.404(4)(e)3., 62-297.310(7)(a)1., (7)(a)3., (7)(a)4.b. F.A.C.; Construction Permit No. 1230001-017-AC]

B.12. Visible Emissions. The test method for visible emissions shall be DEP Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C., and shall be performed once each federal fiscal year.

Visible emissions limits for Kraft pulp mill emissions units equipped with wet scrubbers shall be effective only if the visible emission measurement can be made without being substantially affected by moisture condensation. If the Department determines that visible emissions exceed 20 percent opacity, a special compliance test may be required in accordance with Rule 62-297.310(7)(b), F.A.C.

[Rule 62-296.410(3), F.A.C.; Rule 62-297.401(9)(c), F.A.C.; Permit No. AC62-141927; Construction Permit No. 1230001-017-AC]

EXCESS EMISSIONS

B.13. Excess Emissions. Excess emissions resulting from startup, shutdown, or malfunction of any emission units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 8 hours in any 24-hour period unless specifically authorized by the Department for longer duration.

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision.}

[Construction Permit No. 1230001-017-AC]

CONTINUOUS MONITORING REQUIREMENTS

B.14. TRS Emissions. Total Reduced Sulfur (TRS) emissions incineration temperature shall be continuously monitored and recorded.
[Rule 62-296.404(5)(c), F.A.C.; Permit No. AC62-141927; May 17, 1990 Amendment; Construction Permit No. 1230001-017-AC]

PERMITTEE:

Buckeye Florida, Limited Partnership
One Buckeye Drive,
Perry, Florida 32347

I.D. Number: 1230001
Permit/Cert Number: 1230001-018-AC
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Expiration Date: February 16, 2006
County: Taylor

RECORDKEEPING AND REPORTING REQUIREMENTS

B.15. Total Reduced Sulfur (TRS). The Permittee shall submit a Total Reduced Sulfur (TRS) emissions and surrogate parameter data report to the Department postmarked by the 30th day following the end of each calendar quarter. The report shall comply with the requirements of Rule 62-296.404(6), F.A.C.
[Rule 62-296.404(6), F.A.C.; Permit No. AC62-141927; Construction Permit No. 1230001-017-AC]

COMMON CONDITIONS

B.16. This emissions unit is also subject to Common Conditions C.1.- C.14.

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SPECIFIC CONDITIONS:

Subsection C. The following specific conditions apply to the emissions unit listed below:

Emissions Unit No.	Description
002	No. 1 Power Boiler
004	No. 1 Bark Boiler

FLORIDA ADMINISTRATIVE CODE COMMON CONDITIONS

- C.1. Compliance Test Procedures:** Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
- C.2. Compliance Test Notification:** At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the Air Compliance Section of Northeast District Department of Environmental Protection (DEP) Office. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company and telephone number of the person conducting the test.
[Rule 62-297.310(7)(a)9., F.A.C.]
- C.3. Operation During Compliance Test:** Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity as defined in Specific Condition A.2. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.
[Rule 62-297.310(2)(b), F.A.C.]
- C.4. Requirements for Annual Testing:** The owner or operator shall meet all applicable requirements of Rule 62-297.310(4), F.A.C.
[Rule 62-297.310(4), F.A.C.]
- C.5. Compliance Test Reports:** Reports of the required compliance tests shall be submitted as soon as practical but no later than 45 days after the last test is completed. Each test report shall include the maximum input / production rate at which this source was operated since the most recent test.
[Rule 62-297.310(8),F.A.C.]

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SPECIFIC CONDITIONS:

- C.6. Special Compliance Tests.** When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(7)(b), F.A.C.]
- C.7. Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
[Rule 62-297.310(5)(a), F.A.C.]
- C.8. Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5)(b), F.A.C.]
- C.9. Annual Operating Report.** The owner or operator shall submit an Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) to the Northeast District Department of Environmental Protection (DEP) Office annually pursuant to Rule 62-210.370(3), F.A.C.

COMMON CONDITIONS

- C.10.** This permit shall supercede previous construction permits issued for these emission units and activities only to the extent of incorporating the conditions of this permit.
- C.12.** Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.
- C.13.** The permittee shall submit an application for a Title V Permit Revision no later than 180 days after these emissions units commence operation under the terms of this permit.
[Rule 62-213.420(1)(a)5., F.A.C.]
- C.14.** All tests, notifications or other submittals required by this permit shall be submitted to the:

Department of Environmental Protection
Northeast District – Air Program
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256
Telephone: 904/807-3300
Fax: 904/448-4363

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SPECIFIC CONDITIONS:

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Christopher L. Kirts, P.E.
District Air Program Administrator