Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard
Jr.
Secretary

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

Buckeye Florida Limited Partnership
One Buckeye Drive
Perry, Florida 32056

Authorized Representative:
Mr. Howard A. Drew

Air Permit Number: 1230001-038-AC
Date of Issue:
Expiration Date:

Draft

Project: Foley Mill - Bark Boiler No. 1 and Recovery Boiler No. 3 Natural Gas (NG) Project

PROJECT AND LOCATION

This final air construction permit authorizes the Foley Mill - Bark Boiler No. 1 and Recovery Boiler No. 3 NG project. NG burners will be installed on the No. 1 Bark Boiler and the No. 3 Recovery Boiler burners will be converted to dual fuel (fuel oil/natural gas) burners to diversify fuels available at these emission units. The facility is located in Taylor County at US 19, south of SR 30, southeast of Perry, Florida 32348. The UTM coordinates are Zone 17; 256.7 km East; and, 3328.7 km North. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information
Section 2. Administrative Requirements
Section 3. Emissions Unit Specific Conditions
Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This permit supplements all other air construction and operation permits for the subject emissions unit and does not alter any requirements from such previously issued air permits.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental

Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

Draft

_____

Khalid A. Al-Nahdy, P.E.
District Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____Draft_____ to the persons listed below.

Ms. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
Mr. Howard Drew, Buckeye Florida., Limited Partnership (Howard_Drew@bkitech.com)
Mr. David Weeden, Buckeye Florida, Limited Partnership (Dave_Weeden@bkitech.com)
Mr. David A. Buff, P.E., Golder Associates, Inc. (dbuff@golder.com)
Ms. Tammy McWade, DARM, DEP (tammy.mcwade@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Draft

_____

(Clerk) (Date)

FACILITY DESCRIPTION

Buckeye Florida, Limited Partnership operates an existing dissolving grade Kraft process pulp mill in Perry, Florida. In the Kraft process, the digesting liquor (white liquor) is a solution of sodium hydroxide and sodium sulfide that is mixed with wood chips and cooked under pressure. The spent liquor, known as weak black liquor, is concentrated and sodium sulfate is added to make up for chemical losses. The black liquor solids (BLS) are burned in the recovery furnaces to produce a smelt of sodium carbonate and sodium sulfide. The smelt is dissolved in water to form green liquor to which quicklime (calcium oxide) is added to convert the sodium carbonate back to sodium hydroxide, which reconstitutes the cooking liquor. The spent lime cake (calcium carbonate) is recalcined in a rotary lime kiln to produce quicklime, which is used to convert the green liquor to cooking liquor. Steam and energy needs at the plant are met by: combination boilers, which burn bark/wood, tall oil, supplemental residual oil; power boilers, which burn residual oil, tall oil, natural gas; and recovery boilers, which burn BLS, tall oil, and supplemental residual oil.

PROPOSED PROJECT

Bark Boiler No. 1 -- This project will involve removal of eight of twelve existing oil burners and installation of two natural gas burners. This change will provide flame stabilization and result in a more stable boiler operation by allowing the facility to burn natural gas continuously while burning carbonaceous fuel. After the burner replacement the Bark Boiler No. 1 will be equipped with four remaining oil fired burners with a maximum capacity of 21 MMBtu per hour each and two NG burners with a capacity of 42 MMBtu per hour each. The total fossil fuel heat capacity for the Bark Boiler No. 1 will be 168 MMBtu per hour. Since it is expected that the use of fossil fuel (primarily natural gas) will increase as a result of this change in fuels and burners, the Bark Boiler No. 1 is considered an affected emission unit for the construction permit. It is noted that the current Title V Air Operation Permit 1230001-031-AV limits the heat input from fuel oil combustion to 240 MMBtu per hour. The new maximum fossil fuel capacity is 168 MMBtu per hour.

Recovery Boiler No. 3 -- The project will involve conversion of the existing four fuel oil burners at the unit to dual fuel burners (i.e., natural gas/fuel oil). The current fuel oil burners are rated at a maximum capacity of 22 MMBtu per hour each. After the conversion each dual fuel burner will be rated at a maximum capacity of 22 MMBtu per hour firing fuel oil and 21 MMBtu per hour firing NG. The total fossil fuel heat capacity for the Recovery Boiler No. 3 will be 88 MMBtu per hour firing fuel oil and 84 MMBtu per hour firing NG. NG will only be used to replace the use of fuel oil as it is currently permitted (i.e., start-up, shutdown, malfunction, and to maintain flame stability). Emissions of regulated air pollutants from this change in fuels will not increase; therefore this emission unit is not considered an affected unit for this construction permit. The permit authorizes the conversion of the burners to dual fuel burners and the use of NG as an alternative to fuel oil in the same manner that fuel oil is now permitted.

Pursuant to Rule 62-212.400, F.A.C., Buckeye Florida, Limited Partnership provided information to show that the project will not result in an exceedance of the significant emissions rates that require preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality. In accordance with Rule 62-212.300, F.A.C., the draft permit requires Buckeye Florida, Limited Partnership to provide reports summarizing the actual emissions for each year during the 5-year period following completion of the project. This is to ensure that the project remains minor with respect to PSD preconstruction review.

The proposed project will affect the following emissions unit(s).

EU ID No.	Brief Description
004	Bark Boiler No. 1

It is noted that Recovery Boiler No. 3 (EU No. 007) has a physical change (conversion to dual fuel burners) and the use of natural gas as a fuel, however there will not be an actual emission increase of a pollutant, as a result of this change, therefore it is not considered an affected unit for this project.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a major source of air pollutants, other than HAPs.
- This facility has one or more emissions units subject to NSPS (40 CFR 60).
- This facility has one or more emissions units subject to NESHAP (40 CFR 61 or Part 63)

1. Permitting & Compliance Authority: The permitting and compliance authority for this project is the Northeast District Office, Florida Department of Environmental Protection (Department). The mailing address is 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590. The telephone number is (904) 256-1556. All documents related to applications for permits to operate an emissions unit shall be submitted to this District office. All documents related to compliance activities such as reports, tests, and notifications shall be submitted to this District Office.

2. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.

3. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

4. Permit Expiration: For good cause, the permittee may request that this air construction permit be extended. Such a request shall be submitted to the Department's Northeast District Office at least sixty (60) days prior to the expiration of this permit.

   [Rules 62-4.070(4), 62-4.080 and 62-210.300(1), F.A.C.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

   [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.

   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Construction Permit Required. Unless exempt from permitting pursuant to Rule 62-210.300(3)(a) or (b), F.A.C., or Rule 62-4.040, F.A.C., an air construction permit shall be obtained by the owner or operator of any proposed new, reconstructed, or modified facility or emissions unit, or any new pollution control equipment prior to the beginning of construction, reconstruction pursuant to CFR 60.15 or 63.2, or modification of the facility or emissions unit or addition of the air pollution control equipment; or to establish a PAL; in accordance with all applicable provisions of Chapter 62-210, F.A.C., Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C.

   [Rule 62-210.300(1)(a), F.A.C.]

8. Source Obligation:

   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   [Rule 62-212.400(12), F.A.C.]

9. The ID Number and Project Name for this source shall be used on all correspondences.

10. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit(s). The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of the NG Project. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

11. Existing Permits and Regulations: The conditions of this permit temporarily supplements all other previously issued air construction and operation permits for this emissions unit. These conditions are in addition to all other applicable permit conditions and regulatory

requirements. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, operation of air pollution control devices, and the like. The Permittee shall also comply with the applicable Rules of 62-4, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.

[Rule 62-4.070, F.A.C.]

This section of the permit addresses the following emissions unit(s):

ID	Emission Unit Description
004	**Bark Boiler No. 1:** No. 1 Bark Boiler with particulate matter emissions controlled by a cyclone collector and a wet, Venturi scrubber manufactured by Ducon (92 R/180 Type VVC). Fly ash collected by the cyclone collector is recirculated back to the boiler. Following the scrubber is a chevron type demister (entrainment separator). Water is utilized as the scrubbing media. The control efficiency is estimated at 95%. At permitted capacity, the exhaust gas flow rate from the boiler is 115,073 acfm with an exit temperature of 160° F. Exhaust gases from the boiler exit through a common stack with E.U. 002, 003, 004, 019 that is 13 feet in diameter and 225 feet tall. As the primary control device for 40 CFR 63.443 (Phase I) compliance, Low Volume, High Concentration (LVHC) Noncondensible Gases (NCGs) from the from the Pulping System (Nos. 1 and 2 Batch Digester Systems, Blow Heat Recovery System, the Turpentine Recovery System (includes the Turpentine Condenser, Decanter, Weir Box, and Underflow Tank), Nos. 1-4 Multiple Evaporator Systems, and the pulping process condensate collection system are collected and transported to this boiler for destruction. The secondary control device is the No. 1 Power Boiler. The Bark Boiler No. 1 may combust carbonaceous fuel consisting of wood materials such as bark, chips, sawdust and other such wood fiber material, No. 6 fuel oil with a maximum sulfur content of 2.5% by weight, No. 2 fuel oil with a maximum sulfur content of 0.5% by weight, tall oil as fired (may or may not be blended with fuel oil) with a maximum sulfur content of 2.5% by weight, and natural gas. This emissions unit is subject to CAM for Particulate Matter emissions.
007	**Recovery Boiler No. 3:** A direct contact evaporator design recovery boiler manufactured by Combustion Engineering. The furnace was constructed in 1964 and is not of membrane wall construction to minimize air in-leakage (Old Design Kraft Recovery Furnace – 62-210.200(219), F.A.C.). The total maximum operation heat input of this emissions unit is 527 MMBtu/hr based on a fuel heating value of 6400 Btu/lb of BLS. At the maximum firing rate, the boiler will produce approximately 325,000 lb/hour of steam. At permitted capacity, the exhaust gas flow rate is 119,300 acfm at 8% oxygen with an exit temperature of 350° F. Exhaust gases exit a stack that is 9.5 feet in diameter and 225 feet tall.

	Strong black liquor (~55% solids) is oxidized using atmospheric air in a two-stage , heavy, Black Liquor Oxidation (BLO) System designed by Rust Engineering, before being fed to the DCE. The particulate matter collected by the ESP, primarily composed of Na2SO4 (Saltcake) is removed by mechanical conveyance and added into the black liquor at the DCE where the solids content of the black liquor is increased to ~65% before being burned in the furnace. Particulate matter emissions are controlled by a two-chamber, three fields per chamber, rigid electrode, dry-bottom electrostatic precipitator manufactured by Environmental Elements Corporation (ENELCO) that was originally installed in 1966. The collection efficiency is guaranteed to be 99.14 percent. Opacity emissions are monitored with a COMS manufactured by Land Instruments International, Model MKII 4500. Total Reduced Sulfur compounds are reduced by the two-stage heavy BLO system. This emissions unit has a CEMS required for compliance purposes, therefore, it is exempt from CAM for TRS monitoring. This emissions unit is subject to CAM for Particulate Matter emissions in those instances it is out of compliance with the 40 CFR 63, Subpart MM standards. The Recovery Boiler No. 3 may combust Black Liquor at approximately 65% black liquor solids (BLS) content and 11.4 lb/gallon density, No. 6 fuel oil with a maximum sulfur content of 2.5% by weight, No. 2 fuel oil with a maximum sulfur content of 0.5% by weight, tall oil as fired (may or may not be blended with fuel oil) with a maximum sulfur content of 2.5% by weight, and natural gas.

BARK BOILER No. 1

PERFORMANCE RESTRICTIONS

1. Permitted Capacity: The maximum heat input to the Bark Boiler No. 1 shall be limited to 300 MMBtu per hour. The maximum fossil fuel heat input to Bark Boiler No. 1 based upon physical capacity is: (i) Fuel oil (No. 2 or No. 6) -- 84 MMBtu per hour, (ii) NG -- 84 MMBtu per hour. The maximum total fossil fuel heat input to Bark Boiler No. 1 is 168 MMBtu per hour.
   [Rule 62-210.200(PTE), F.A.C.]

2. Operation Hours: The hours of operation are not limited (i.e., 8760 hours per year).
   [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

3. Operation: NG and fuel oil may be used individually or in combination as a supplemental fuel to carbonaceous fuel in the Bark Boiler No. 1 during periods other than startup, shutdown, or malfunction. The purpose of the use of the supplemental fuel is to provide

flame stability and provide for a more consistent stable operation of the Bark Boiler No. 1 while combusting carbonaceous fuel. This permit does not authorize the combustion of fossil fuel in such a manner, duration, or quantity such that the boiler would be subject to additional regulation under New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and/or Rule 62-296.405, F.A.C. and/or Rule 62-296.406, F.A.C. regarding Fossil Fuel Steam Generating Units. Combustion of fossil fuel in such a manner, duration, or quantity such that the boiler would be subject to additional regulation under New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and/or Rule 62-296.405, F.A.C. and/or Rule 62-296.406, F.A.C. regarding Fossil Fuel Steam Generating Units requires the submittal of an application and issuance of a separate air construction permit to authorize such a use.
[Rule 62-4.070(3), F.A.C.]

EMISSION APPLICABILITY AND STANDARDS

4. The new applicability of New Source Performance Standards (NSPS) ,National Emission Standards for Hazardous Air Pollutants (NESHAP), and/or Rule 62-296.405, F.A.C. and/or Rule 62-296.406, F.A.C. for Fossil Fuel Steam Generating Units to this emission unit is not affected by this project based upon the information submitted in the permit application (Application File No. 1230001-038-AC). Note: See condition No. 3 above.
[Rule 62-210.200, F.A.C., Rule 62-204.800, F.A.C.]

COMPLIANCE DATE

5. Upon start-up of the NG Project the Bark Boiler No. 1 shall be in compliance with all applicable requirements.
[Rule 62-4.070(3), F.A.C.]

MONITORING, RECORDKEEPING, and REPORTING PROCEDURES

6. The permittee shall record and maintain records of the following parameters on a monthly basis:
   (i) Type and quantity of fuel combusted during start-up, shutdown, and malfunction periods
   (ii) Type and quantity of fuel combusted during periods other than (i) above.
[Rule 62-4.070(3), F.A.C.]

7. The above records shall be provided to the Department upon request.
[Rule 62-4.070(3), Rule 62-4.160, F.A.C.]

PREVENTION OF SIGNIFICANT DETERIORATION

8. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and the project avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

   a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

   b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

      (1) The name, address and telephone number of the owner or operator of the major stationary source;
      (2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
      (3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
      (4) Any other information that the owner or operator wishes to include in the report.

   c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

   d. For this project, the following are the estimated baseline actual emissions: SO_2 -- 62.50 tons/year; NOx -- 202.08 tons/year; CO -- 535.92 tons/year; PM -- 113.94 tons/year; PM_{10} -- 111.67 tons/year; $PM_{2.5}$ -- 111.66 .tons/year; VOC -- 30.37 tons/year; SAM -- 2.78 tons/year; Pb -- 1.50E-02 tons/year; Hg -- 6.04E-04 tons/year; Fl -- 0.012 tons/year; CO_2 -- 187,481 tons/year; CH_4 -- 63.06 tons/year; N_2O -- 8.28 tons/year; GHG -- 187,552 tons/year; and CO_2e -- 191,372 tons/year.

   e. For this project, the following are the estimated maximum projected actual emissions: SO_2 -- 85.76 tons/year; NOx -- 216.52 tons/year; CO -- 546.07 tons/year; PM -- 118.08 tons/year; PM_{10} -- 115.73 tons/year; $PM_{2.5}$ -- 115.72 tons/year; VOC -- 30.99 tons/year; SAM -- 3.81 tons/year; Pb -- 1.56E-02 tons/year; Hg -- 6.40E-04 tons/year; Fl -- 0.0143 tons/year; CO_2 -- 195,853 tons/year; CH_4 -- 64.02 tons/year; N_2O -- 8.43 tons/year; GHG -- 195,925 tons/year; and CO2e -- 199,810 tons/year.

f. For this project, the following are the estimated maximum projected actual emission increases: SO_2 -- 23.26 tons/year; NOx -- 14.44 tons/year; CO -- 10.15 tons/year; PM -- 4.14 tons/year; PM_{10} -- 4.06 tons/year; $PM_{2.5}$ -- 4.05 tons/year; VOC -- 0.62 tons/year; SAM -- 1.03 tons/year; Pb -- 5.60E-04 tons/year; Hg -- 3.60E-05 tons/year; Fl -- 0.0023 tons/year; CO_2 -- 8372 tons/year; CH_4 -- 0.96 tons/year; N_2O -- 0.14 tons/year; GHG -- 8373 tons/year; and CO2e -- 8437 tons/year.

g. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual emissions for the affected EU(s) and activities:

   a. Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions as used in the application to establish baseline emissions.

   b. As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

[Application No. 1230001-038-AC; Rules 62-212.300(1)(e), and 62-210.370, F.A.C.]

RECOVERY BOILER No. 3

PERFORMANCE RESTRICTIONS

1. Permitted Capacity: The maximum heat input to the Recovery Boiler No. 3 shall be limited to 527 MMBtu per hour. The maximum fossil fuel heat input to Recovery Boiler No. 3 (based upon physical capacity) is: (i) Fuel oil (No. 6) -- 88 MMBtu per hour (4 dual fuel burners @ 22 MMBtu per hour each), (ii) NG -- 84 MMBtu per hour(4 dual fuel burners @ 21 MMBtu per hour each).
   [Rule 62-210.200(PTE), F.A.C.]

2. **The total maximum oil firing rate is 603 gallons per hour, which is equivalent to a heat input rate of 80 MMBtu per hour based upon a fuel heating value of 146 MMBtu per 1000 gallons of fuel oil. The oil firing system consists of four oil burners. Each oil burner has a capacity of 20 MMBtu per hour.*

   [*Permit No. 1230001-023-AC/PSD - FL - 397*; Rule 62-4.070(3) and 62-210.200(PTE), F.A.C.]

3. **No more than 2,000,000 gallons of oil shall be fired in the No. 3 Recovery Boiler during any consecutive 12 month period, rolling total.*

   [*Permit No. 1230001-023-AC/PSD - FL - 397*; Rules 62-4.070(3), 62-210.200(PTE), and 62-212.400 (PSD), F.A.C.]

4. No more than 286.27 million cubic feet of gas (at 1020 Btu per cubic foot) shall be fired in the No. 3 Recovery Boiler during any consecutive 12 month period, rolling total. It is noted that this amount is equivalent in Btu content to 2,000, 000 gallons of fuel oil at 146,000 Btu per gallon. Natural gas use is a substitute for fuel oil use and is not in addition to fuel oil use.

   [Rules 62-4.070(3), and 62-210.200(PTE), F.A.C.]

5. Operation Hours: The hours of operation are not limited (i.e., 8760 hours per year).
   [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

6. Operation: NG and fuel oil may be used alone or in combination as a supplemental fuel to black liquor fuel in the Recovery Boiler No. 3 during periods other than startup, shutdown, or malfunction. The purpose of the use of the supplemental fuel is to provide flame stability and provide for a more consistent stable operation of the Recovery Boiler No. 3 while combusting black liquor fuel. This permit does not authorize the combustion of fossil fuel in such a manner, duration, or quantity such that the boiler would be subject to additional regulation under New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and/or Rule 62-296.405, F.A.C. and/or Rule 62-296.406, F.A.C. for Fossil Fuel Steam Generating Units. Combustion of fossil fuel in such a manner, duration, or quantity such that the boiler would be subject to additional regulation under New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and/or Rule 62-296.405, F.A.C. and/or Rule 62-296.406, F.A.C. for Fossil Fuel Steam Generating Units requires the submittal of an application and issuance of a separate air construction permit to authorize such a use.

** From Permit No. 1230001-023-AC/PSD - FL - 397*

COMPLIANCE DATE

7. Upon start-up of the NG Project the Recovery Boiler No. 3 shall be in compliance with all applicable requirements.
   [Rule 62-4.070(3), F.A.C.]

MONITORING, RECORDKEEPING, and REPORTING PROCEDURES

8. The permittee shall record and maintain records of the following parameters on a monthly basis:
   (i) Type and quantity of fuel combusted during start-up, shutdown, and malfunction periods
   (ii) Type and quantity of fuel combusted during periods other than (i) above.
   [Rule 62-4.070(3), F.A.C.]

9. The above records shall be provided to the Department upon request.
   [Rule 62-4.070(3), Rule 62-4.160, F.A.C.]