PERMITTEE

Buckeye Florida, Limited Partnership
One Buckeye Drive
Perry, FL 32348

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Northeast District Office, Air Program
7825 Baymeadows Way, Suite B-200
Jacksonville, FL 32256

PROJECT

Air Permit No. 1230001-038-AC
Air Construction Permit
Bark Boiler No. 1 and Recovery Boiler No. 3 Natural Gas Project

NOTICE AND PUBLICATION

The Department distributed a draft air construction permit package on January 26, 2012. The applicant published the Public Notice of Intent to Issue Air Permit in the **PERRY NEWS-HERALD/TACO TIMES** newspaper on February 29, 2012. The Department received the affidavit of proof of publication on March 12, 2012. No requests for administrative hearings or requests for extensions of time to file a petition for an administrative hearing were received.

COMMENTS

The applicant provided comments on the Draft permit. Based upon those comments changes were made to the permit.

1. Under **Proposed Project** the Bark Boiler No. 1 description was changed and clarified as follows:

   Bark Boiler No. 1 -- This project will involve removal of ~~eight of twelve~~ four of eight 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 rated capacity of 21 MMBtu per hour each and two NG burners with a rated capacity of 42 MMBtu per hour each. The total rated 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.~~

The following specific conditions for Bark Boiler No. 1 were changed.

2. Permitted Capacity: The maximum heat input to the Bark Boiler No. 1 shall be limited to 300 MMBtu per hour. The ~~maximum~~ total rated fossil fuel heat input capacity of ~~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.~~ Based upon a maximum over fire rate of 10% the maximum fossil fuel heat input to Bark Boiler No. 1 shall be limited to 184.8 MMBtu per hour.

   [Rule 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 (SSM). During periods of SSM good air pollution control practices shall be used to minimize air pollutant emissions. This may include the use of NG and fuel oil (individually or in combination). 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.]

The following specific conditions of Recovery Boiler No. 3 were clarified.

4. **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.*

   Note: The 603 gallons per hour firing rate at 146,000 Btu per gallon is equivalent to a heat input of 88 MMBtu per hour. This is based upon an over fire rate of 10%.

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

5. 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. During periods of SSM good air pollution control practices shall be used to minimize air pollutant emissions. This may include the use of NG and fuel oil (individually or in combination). 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*

CONCLUSION

The final action is to issue the permit as distributed with the changes noted above.