FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

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PERMITTEE

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

Authorized Representative:
Mr. Howard A. Drew, Vice President

Air Permit No. 1230001-040-AC
Permit Expires: July 31, 2015
Issue Date: January 9, 2013
Foley Kraft Pulp Mill
ARMS ID No. 1230001
Temporary Stack Project

PROJECT AND LOCATION

The permittee is authorized to construct a new, temporary stack for the No. 2 Bark Boiler and necessary ductwork for rerouting of the discharge gases from the Nos. 1 and 2 Power Boilers to the No. 3 Recovery Boiler stack. The temporary stack will be utilized during periods of inspection and necessary repairs of the COMBO stack which currently serves to discharge pollutant emissions from the No. 1 Bark Boiler, No. 2 Bark Boiler, No. 1 Power Boiler and the No. 2 Power Boiler. During periods of use of the temporary stack pollutant emissions from the No. 1 and No. 2 Power Boilers shall be discharged from the No. 3 Recovery Boiler stack. The No. 1 Bark Boiler shall be shutdown during the periods that the temporary stack is utilized. The expected period of use for the temporary stack will be approximately two weeks for inspection and then several weeks during repairs on the COMBO stack system. Air modeling analysis submitted by the applicant for this project indicates that allowed ambient air concentrations will be met during the use of the temporary stack. The Temporary Stack Project is not intended or expected to result in an increase in mill production capacity.

The proposed work will be conducted at the Buckeye Florida, Limited Partnership Foley Mill, which is a Kraft Pulp Mill (Standard Industrial Classification No. 2611). The existing facility is located in Taylor County at One Buckeye Drive, Perry, Florida 32348. The UTM coordinates are: Zone 17, 256.7 km East and 3328.7 km North; Latitude: 30°03’59” North and Longitude: 83°33’12” West.

STATEMENT OF BASIS

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 and as described in the application, approved drawings, plans, and other documents on file with the Department. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

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Executed in Jacksonville, Florida

Khalid Al-Nahdy

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

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, January 9, 2013,
pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk,
receipt of which is hereby acknowledged.

Shane Maghen January 9, 2013

(Clerk) (Date)

SUBSECTION A. 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/natural gas.

The existing facility consists of the following emissions units.

EU No.	Description
002	No.1 POWER BOILER
003	No.2 POWER BOILER
004	No.1 BARK BOILER
006	No.2 RECOVERY BOILER
007	No.3 RECOVERY BOILER
011	No.4 RECOVERY BOILER
019	No.2 BARK BOILER
021	No.2 SMELT DISSOLVING TANK
022	No.3 SMELT DISSOLVING TANK
023	No.4 SMELT DISSOLVING TANK
024	No.4 LIME KILN AND STORAGE BINS (2)
025	2 LIME SLACKERS
040	TALL OIL PROCESSING
041	No.2 PURIFICATION PLANT
045	No.1 PURIFICATION PLANT
046	PULPING SYSTEM MACT I

Unregulated Emissions Units and/or Activities: *Refer to Appendix U-1, List of Unregulated Emissions Units and/or Activities*

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

E.U. ID No.	Brief Description
002	No.1 POWER BOILER
003	No.2 POWER BOILER
004	No.1 BARK BOILER
019	No.2 BARK BOILER
007	No.3 RECOVERY BOILER

PROJECT DESCRIPTION

The permittee is authorized to construct a new, temporary stack for the No. 2 Bark Boiler and necessary ductwork for rerouting of the discharge gases from the Nos. 1 and 2 Power Boilers to the No. 3 Recovery Boiler stack. The temporary stack will be utilized during periods of inspection and necessary repairs of the COMBO stack which currently serves to discharge pollutant emissions from the No. 1 Bark Boiler, No. 2 Bark Boiler, No. 1 Power Boiler and the No. 2 Power Boiler. During periods of use of the temporary stack pollutant emissions from the No. 1 and No. 2 Power Boilers shall be discharged from the No. 3 Recovery Boiler stack. The No. 1 Bark Boiler shall be shutdown during the periods that the temporary stack is utilized. The expected period of use for the temporary stack will be approximately two weeks for inspection and then several weeks during repairs on the COMBO stack system. Air modeling analysis submitted by the applicant for this project indicates that allowed ambient air concentrations will be met during the use of the temporary stack. The Temporary Stack Project is not intended or expected to result in an increase in mill production capacity and/or result in an actual increase in air pollutant emissions.

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 (CAA).
- 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 Part 61 or Part 63)

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Northeast District Office, Air Resources Section. The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office. The mailing address and phone number of the District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Permitting Authority's telephone number is 904/256-1700.

3. 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

   d. Appendix D. Common Testing Requirements

4. 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.

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. 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.]

8. Application for Title V Permit: This permit authorizes construction/modification of the permitted emissions units and initial operation. A Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Title V air operation permit revision at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of the new equipment, whichever occurs first. To apply for a Title V operation permit revision, 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 and Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

9. The permittee shall report to the Department the commencement of construction date of the temporary stack system within 30 days after beginning construction.

   [Rule 62-4.070(3), F.A.C.]

10. The permittee shall report to the Department the completion of construction date of the temporary stack system within 30 days after completing construction. As built temporary stack parameters shall be described and submitted with this report.

    [Rule 62-4.070(3), F.A.C.]

A - Temporary Stack Project -- No. 1 Power Boiler

This section of the permit addresses the following emissions unit.

Emissions Unit Number	Brief Description
002	No. 1 Power Boiler (Babcock & Wilcox Co.). The emissions unit is an existing emissions unit constructed in 1953. The total maximum operational heat input of this emissions unit is 249 MMBtu/hr. This emissions unit is capable of serving the mill with 195,000 lb/hr of steam flow. At permitted capacity, the exhaust gas flow rate is 80,000 acfm with an exit temperature of 325° F. Exhaust gases exit a stack that is 13 feet in diameter and 225 feet tall. Low Volume, High Concentration (LVHC) Noncondensible gases (NCG) 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 routed to a packed-bed, scrubber, manufactured by Croll Reynolds Inc., Model 36T-16H (a pre-scrubber), prior to entering the boiler for compliance with 40 CFR 63.443 (Phase I) compliance. This boiler is utilized as the secondary control device for compliance with these Subpart S standards. The No. 1 Bark Boiler is the primary control device. Weak wash is utilized as the scrubbing media in the pre-scrubber. The scrubber flow rate and pressure drop are continuously monitored. The control efficiency, as confirmed by test data, is a minimum of 50%. The boiler is authorized to operate as the secondary 40 CFR 63.443 (Phase I) control device for a period not to exceed 960 hours per year. This emissions unit is not subject to CAM.

PERFORMANCE RESTRICTIONS

A.1. Capacities : The proposed work shall not result in any increase in the mill pulp production rate.

[Rule 62-4.070(3), F.A.C. and Application No. 1230001-040-AC]

A.2. Hours of Operation. This emissions unit shall be allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.3. During periods when the pollutant emissions from the operation of the No. 1 Power Boiler are routed to the No. 3 Recovery Boiler stack for discharge, the No. 1 Power Boiler shall only combust natural gas.

This method of operation will assist in maintaining ambient air concentrations of criteria pollutants below ambient air quality standards.

[Rule 62-4.070(3), F.A.C., Application No. 1230001-040-AC]

B - Temporary Stack Project -- No. 2 Power Boiler

This section of the permit addresses the following emissions unit.

Emissions Unit Number	Brief Description
003	No. 2 Power Boiler (Babcock & Wilcox Co.). The boiler has 4 burners with a front firing arrangement. The boiler was originally constructed in 1954. The total maximum operation heat input of this emissions unit is 249 MMBtu/hr. This emissions unit is capable of serving the mill with 195,000 lb/hr of steam flow. At permitted capacity, the exhaust gas flow rate is 80,000 acfm with an exit temperature of 325° 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. This emissions unit does not have add-on control device, therefore CAM is not applicable to this emissions unit.

PERFORMANCE RESTRICTIONS

B.1. Capacities : The proposed work shall not result in any increase in the mill pulp production rate.

[Rule 62-4.070(3), F.A.C. and Application No. 1230001-040-AC]

B.2. Hours of Operation. This emissions unit shall be allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

B.3. During periods when the pollutant emissions from the operation of the No. 2 Power Boiler are routed to the No. 3 Recovery Boiler stack for discharge, the No. 2 Power Boiler shall continue to only combust natural gas. This method of operation will continue to assist in maintaining ambient air concentrations of criteria pollutants below ambient air quality standards.

[Rule 62-4.070(3), F.A.C., Application No. 1230001-040-AC]

C - Temporary Stack Project -- No. 1 Bark Boiler

Emissions Unit Number	Brief Description
004	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. This emissions unit is subject to CAM for Particulate Matter emissions.

PERFORMANCE RESTRICTIONS

C.1. Capacities: The proposed work shall not result in any increase in the mill pulp production rate.

[Rule 62-4.070(3), F.A.C. and Application No. 1230001-040-AC]

C.2. Hours of Operation. This emissions unit shall be allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

C.3. During periods when the pollutant emissions from the operation of the No. 2 Bark Boiler are routed to the temporary stack the pollutant emissions from the operation of the Power Boilers shall be routed to the No. 3 Recovery Boiler stack for discharge and the No. 1 Bark Boiler shall not operate. This method of operation will assist in maintaining ambient air concentrations of criteria pollutants below ambient air quality standards. All boilers may operate during transition periods from one stack to another.
[Rule 62-4.070(3), F.A.C.]

D - Temporary Stack Project -- No. 2 Bark Boiler

Emissions Unit Number	Brief Description
019	No. 2 Bark Boiler and associated bark dryer system. A portion of flue gases are used to dry wet bark prior to being fired in this boiler and the No. 1 Bark Boiler. Particulate matter emissions from the dryer are controlled by a wet, Venturi scrubber manufactured by AirPoly Systems. Particulate matter emissions from the boiler are controlled by a cyclone collector followed by ~~and~~ a wet, Venturi scrubber manufactured by AirPoly Systems. Collected particulate is re-injected into the boiler. The scrubber utilizes water as the scrubbing media. At permitted capacity, the exhaust gas flow rate from the boiler is 210,000 acfm with an exit temperature of 150° F. Exhaust gases from the boiler and the dryer exit through a common stack with E.U. 002, 003, 004, 019 that is 13 feet in diameter and 225 feet tall. This emissions unit is subject to CAM for Particulate Matter emissions.

PERFORMANCE RESTRICTIONS

D.1. Capacities: The proposed work shall not result in any increase in the mill pulp production rate.

[Rule 62-4.070(3), F.A.C. and Application No. 1230001-040-AC]

D.2. Hours of Operation. This emissions unit shall be allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

D.3. During periods when the pollutant emissions from the operation of the No. 2 Bark Boiler are routed to the temporary stack the pollutant emissions from the operation of the Power Boilers shall be routed to the No. 3 Recovery Boiler stack for discharge and the No. 1 Bark Boiler shall not operate. This method of operation will assist in maintaining ambient air concentrations of criteria pollutants below ambient air quality standards. All boilers may operate during transition periods from one stack to another.
[Rule 62-4.070(3), F.A.C.]

Emissions Unit Number	Brief Description
007	Originally the No. 3 Recovery Boiler was constructed as 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.). Project 1230001-023-AC authorized conversion of the boiler to a low-odor, non-direct contact evaporator unit. The maximum firing rate is 82,350 lb/hour of BLS to facilitate the recovery of the cooking liquor. 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. Residual fuel oil and/or natural gas is fired during startup, shutdown and occasionally to supplement BLS. The following pollutants and parameters will be continuously monitored and recorded: CO, NO_X, TRS, oxygen and opacity. At permitted capacity, the exhaust gas flow rate is 119,300 dscfm 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. Particulate matter emissions are controlled by an ESP. The ESP was manufactured by Environmental Elements Corporation and installed in 1996 with the following specifications: dry-bottom; rigid electrodes; two chambers; three fields per chamber; a design inlet flow rate of 235,000 acfm at 375° F; an inlet dust loading of 3 grains per acf; and a specific collection area 273.4 $feet^2$/1,000 acfm. The collection efficiency is guaranteed to be 99.14 percent. Opacity emissions are continuously monitored with a COMS manufactured by Land Instruments International, Model Number (M/N) 4500 MKII+. TRS emissions are continuously monitored with a Thermo Environmental M/N 43C continuous emission monitor. Fuel flow of ultra low sulfur distillate (ULSD) fuel is continuously monitored with a Badger Meter, Inc. M/N 25 continuous flow monitor. Oxygen is continuously monitored with a Thermo Environmental M/N 25595003 continuous emission monitor. Carbon Monoxide emissions are continuously monitored with a Thermo Scientific M/N 48c continuous emission monitor. Oxides of Nitrogen emissions are continuously monitored with a Thermo Scientific M/N 42i continuous emission monitor. 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.

PERFORMANCE RESTRICTIONS

E.1. Capacities: The proposed work shall not result in any increase in the mill pulp production rate.

[Rule 62-4.070(3), F.A.C. and Application No. 1230001-040-AC]

E.2. Hours of Operation. This emissions unit shall be allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

E.3. During periods when the pollutant emissions from the operation of the No. 2 Bark Boiler are routed to the temporary stack the pollutant emissions from the operation of the Power Boilers shall be routed to the No. 3 Recovery Boiler stack for discharge and the No. 1 Bark Boiler shall not operate. This method of operation will assist in maintaining ambient air concentrations of criteria pollutants below ambient air quality standards. All boilers may operate during transition periods from one stack to another.
[Rule 62-4.070(3), F.A.C.]