



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT  
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JACKSONVILLE, FLORIDA 32256

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LT. GOVERNOR

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SECRETARY

*Sent by Electronic Mail – Received Receipt Requested*

## PERMITTEE

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

Air Permit No. 1230001-049-AC  
Date Issue: August 1, 2014  
Expiration Date: August 1, 2015

Authorized Representative:  
Howard A. Drew, General Manager  
Buckeye Florida Limited Partnership

Foley Mill  
Air Construction Permit  
No.1 Mill Brown Stock Washing  
System Modification

## PROJECT AND LOCATION

This construction permit authorizes the modification of (EU046) Pulping Area General, No. 1 Mill Brown Stock Washing System at the Foley Mill. The No. 1 Mill Brown Stock Washing System is regulated under the Kraft Pulping Standards of 40 CFR Part 63, Subpart S (MACT I).

The proposed work will be conducted at the existing Foley Mill which is categorized under Standard Industrial Classification No. 2611. The facility is located in Taylor County at east of US 19, south of SR 30, southeast of Perry, Florida. 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.

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.

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.

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



Richard S. Rachal III, P.G.  
Program Administrator  
Waste and Air Resource Management Program

### 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 August 1, 2014 to the persons listed below.

Mr. Howard A. Drew, Buckeye Florida, Limited Partnership [howard.drewjr@gapac.com](mailto:howard.drewjr@gapac.com)  
Mr. Dave Weeden, Buckeye Florida, Limited Partnership [david.weeden@gapac.com](mailto:david.weeden@gapac.com)  
Mr. Phillip D. Cobb, P.E., (of Record) Golder Associates, Inc. [pcobb@golder.com](mailto:pcobb@golder.com)

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.



(Clerk)

August 1, 2014  
(Date)

## SECTION 1. GENERAL INFORMATION

### FACILITY AND PROJECT DESCRIPTION

#### Existing Facility

Buckeye Florida, Limited Partnership Foley Mill is an existing softwood Kraft Process Pulp Mill that manufactures bleached market pulps and dissolving cellulose pulps in Perry, Florida. The dissolving cellulose pulp produced at this plant is used in products such as food casings, rayon industrial cord, acetate fibers and plastics, as well as thickeners for personal care products, food and pharmaceuticals. The bleached market pulps are used in products such as disposable diapers, feminine hygiene products and incontinence products.

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.

The existing facility consists of the following emissions units.

Facility ID No. 1230001	
ID No.	Emission Unit Description
<i>Regulated Emissions Units</i>	
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	TWO LIME SLAKERS
040	TALL OIL PROCESSING
041	No.2 PURIFICATION PLANT
045	No.1 PURIFICATION PLANT

## SECTION 1. GENERAL INFORMATION

046	PULPING AREA GENERAL
051	TRANSFORMER PROCESS
<i>Unregulated Emissions Units and Activities (Refer to Current Title V Operation Permit)</i>	
047	FACILITY WIDE FUGITIVE EMISSIONS
048	CHEMICAL RECOVERY AREA
049	DRYING/CONVERTING/WAREHOUSE
050	WOODYARD

### Proposed Project

The existing BSW system (EU 046) for the No. 1 Pulp Mill includes three vacuum drum washers operating in series. The system receives unbleached pulp from the No. 1 Digester System. The knots in the unbleached pulp are removed prior to the first vacuum drum washer by a two-stage pressure de-knotting system. The unbleached pulp is then washed in the three vacuum drum washers followed by a four-stage pressure screening system. The pressurized screening system removes shives which are transferred to the No. 2 Mill where they are refined and utilized to manufacture fluff pulp. Following the pressurized screening system, a decker is used to thicken the unbleached pulp before it is sent to the No. 1 Mill Purification Plant for bleaching.

This project authorizes the modification of the No. 1 Mill Brown Stock Washing (BSW) System as follows:

- The installation of two new vacuum drum washers to the existing three vacuum drum washers in the No. 1 Pulp Mill BSW System resulting in a five stage vacuum drum washing system operating in series. One of the new vacuum drum washers will be located after the existing 3rd stage washer (4<sup>th</sup> stage). The other will be located after the existing pressure screening system (5<sup>th</sup> stage).
- The source of wash water for the new 4th stage washer will be filtrate off of the new 5th stage washer. The source of wash water for the new 5th stage washer will be a combination of evaporator combined condensate, hot water, and fresh water.
- No physical modifications will be made to the three existing vacuum drum washers. The maximum design rated capacity of the No. 1 Brown Stock Washing System shall remain at 900 tons ADTUBP/ per day.
- The permanent removal of the existing No. 1 Mill BSW Decker System (Decker and Decker Mix Box) from service
- The facility anticipates that the additional washers will improve washing of the pulp, reduce the Biochemical Oxygen Demand (BOD) demand to the wastewater treatment system, reduce plant water usage, and reduce steam consumption. Steam consumption is expected to decrease as a result of increasing the percent solids in the filtrate exiting the No. 1 BSW system because less steam will need to be used in the Multiple Effect Evaporators (MEEs) to raise the solids content of the black liquor. It is expected that the project will reduce the quantity of black liquor (soda) loss to the process sewer for the existing No. 1 BSW system by reducing the carryover of the black liquor in the unbleached pulp leaving the No. 1 BSW system.

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## SECTION 1. GENERAL INFORMATION

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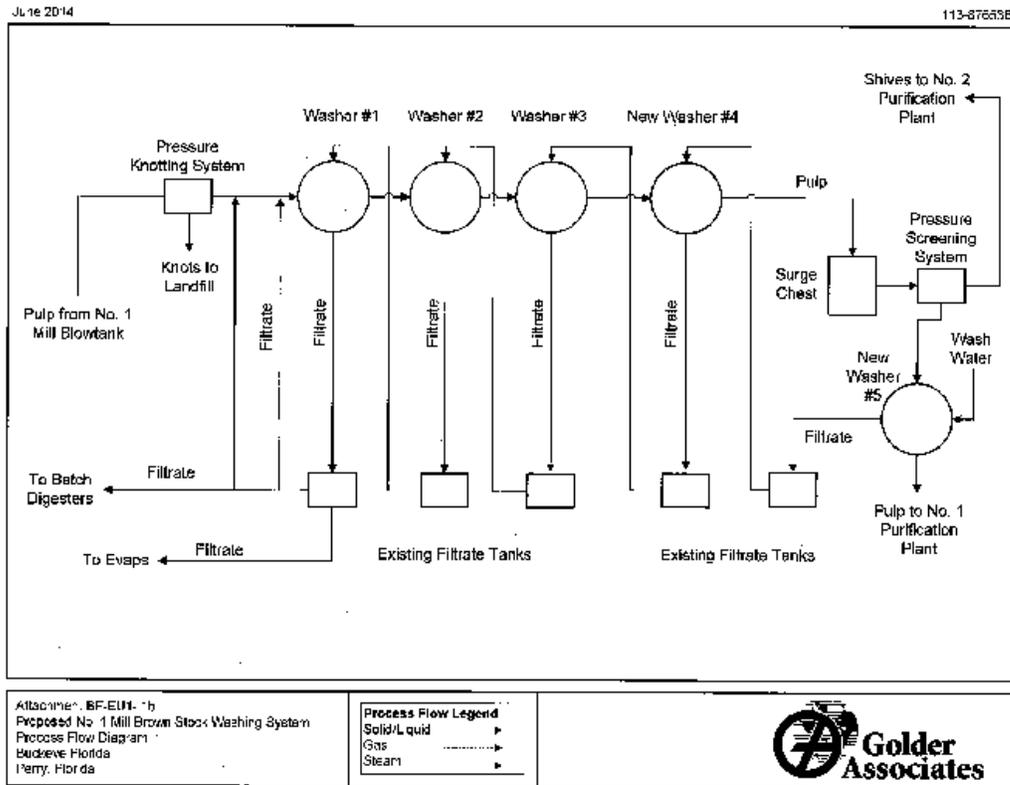
- As a result of the improved pulp washing, the mill estimates approximately 23 pounds of black liquor solids (BLS) per ton of air dried unbleached pulp will be recovered and sent to the recovery furnaces (Nos. 2, 3, and 4 Recovery Furnaces). This increase in BLS throughput will potentially affect the emissions from the following downstream “affected emission sources”:
  - No. 2 Recovery Furnace (RF2)
  - No. 3 Recovery Furnace (RF3)
  - No. 4 Recovery Furnace (RF4)
  - No. 2 Smelt Dissolving Tank (SDT2)
  - No. 3 Smelt Dissolving Tank (SDT3)
  - No. 4 Smelt Dissolving Tank (SDT4)
  - No. 4 Lime Kiln (LK4)
  - Lime Slaker System (which is part of the Reausticizing Area)
  - Lime Storage Bins
  - Reausticizing Area
  - Salt Cake Mix Tanks
  - No. 1 Bark Boiler (EU 004) or No. 1 Power Boiler (EU 002)

After completion of the project, the No. 1 Brown Stock Washing system will consist of the following equipment:

Pressure Knotting System	Existing
Surge Chest	Existing
Pressure screening system	Existing
<del>Decker Mix Box</del>	<del>Removed</del>
<del>Decker</del>	<del>Removed</del>
Vacuum Drum washers (3)	Existing
Vacuum Drum washers (2)	New
Filtrate Tank (5)	Existing

**SECTION 1. GENERAL INFORMATION**

**Proposed No. 1 Brown Stock Washing System Process Flow Diagram**



This project will modify the following emissions units.

<b>Facility ID No. 1230001</b>	
<b>ID No.</b>	<b>Emission Unit Description</b>
<i>Regulated emissions Unit</i>	
046	Pulping Area General - No. 1 Brown Stock Washing System (MACT I emissions unit)

The No. 1 Mill Brown Stock Washer System is regulated under the requirements of 40 CFR 63, Subpart S pulping system MACT I. Additional Pulping System – MACT I regulated existing sources at the facility include: the No. 2 Mill Brown Stock Washer System, the Nos. 1 and 2 Batch Digester systems, the Turpentine Recovery system (includes the turpentine Condenser, Decanter, Weir Box, and Underflow Tank), Multiple Effect Evaporator systems (Nos. 1-4), the oxygen delignification system, and the Pulping Process Condensate Collection System.

## SECTION 1. GENERAL INFORMATION

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### 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 (40CFR 60).
- This facility has one or more emissions units subject to NESHAP (40 CFR 61 or Part 63)

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Northeast District Office, Waste and Air Resource Management Program. 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, Compliance Assurance. The mailing address and phone number of the Northeast District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256 and Phone Number 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; and
  - d. Appendix D. Common Testing Requirements.
  - e. Appendix E. 40 CFR 63 Subpart A – General Provision.
  - f. Appendix F. 40 CFR 63 Subpart S
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, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the owner or operator from compliance with any applicable federal, state, or local permitting or regulations.

[Rule 62-210.300, 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.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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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. Construction Schedule: Construction/installation is planned to commence August 2014. Startup is Scheduled to occur in September 2015 concurrent with or after the completion of the Non-Condensable Gas (NCG) Collection System Improvement Project authorized by Permit No. 1230001-046-AC.

[Rule 62-4.070(3), F.A.C., Application No. 1230001-049-AC]

9. 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. 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. 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.]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**EU 046 Pulping Area/System MACT I**

This section of the permit addresses the following emissions unit.

<b>ID No.</b>	<b>Emission Unit Description</b>
046	<p>Pulping System MACT I includes those sources regulated under MACT I: Nos. 1 and 2 Batch Digester systems, the Turpentine Recovery system (includes the turpentine Condenser, Decanter, Weir Box, and Underflow Tank), Multiple Effect Evaporator systems (Nos. 1-4), and the Pulping Process Condensate Collection System.</p> <p>Condensates from the Digester blow vent condensing system, the Turpentine Recovery System, the black liquor evaporator condensates from the MEE Systems (Nos. 1-4), and the NCG system condensates are pumped through a closed piping system to the No. 1 Lagoon for treatment to remove HAPs.</p> <p>High Volume, Low Concentration (HVLC) sources include the No. 1 Mill and No. 2 Mill Brown Stock Washer systems, and the Oxygen Delignification System. The aeration stabilization basin of the biological treatment system (the No. 1 Lagoon) is also included in this emissions unit as part of the Clean Condensate Alternative.</p>

*{Permitting note: This emissions unit is regulated by 40 CFR 63, Subpart S – National Emission Standards for Hazardous Air Pollutants for Pulp Mills, adopted and incorporated by reference in Rule 62-204.800, F.A.C.}*

- 1. Relation to Other Permits:** The conditions of this permit 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, and the like.

[Rules 62-4.210, 62-4.070, and 62-210.300(1)(b), F.A.C.]

**EQUIPMENT**

- 2. Authorized Modifications:** The Permittee is authorized to install two new Andritz VMax vacuum drum washers to the existing three vacuum drum washers in the No. 1 Pulp Mill resulting in a five stage vacuum drum washing system operating in series. One of the new vacuum drum washers will be located after the existing 3rd stage washer (4<sup>th</sup> stage). The other will be located after the existing pressure screening system (5<sup>th</sup> stage).

The source of wash water for the new 4th stage washer will be filtrate off of the new 5th stage washer. The source of wash water for the new 5th stage washer will be a combination of evaporator combined condensate, hot water, and fresh water.

Construction is set to commence and be completed as stated in Administrative Requirement Condition No. 8.

This construction shall be in accordance with the application and associated documents provided to the Permitting Authority for the issuance of this permit. Any changes to the project that are contrary to these documents and permit shall be reported in writing to the Permitting Authority by the P.E. of Record.

[Application No. 1230001-049-AC]

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### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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#### EU 046 Pulping Area/System (MACT I)

#### ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

3. **Production Capacity:** The rated capacity of the No. 1 Mill BSW System shall not exceed 900 tons ADUP per day.

[Rule 62-210.200(PTE), F.A.C. Application No. 1230001-049-AC]

4. **Hours of Operation:** 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.]

#### EMISSION APPLICABILITY AND STANDARDS

5. The No. 1 Mill Brown Stock Washing System is an affected source and regulated under the National Emissions Standards for Hazardous Air Pollutants (NESHAPS), Subpart S.

[40 CFR 63.440, Rule 62-204.800, F.A.C.]

6. The Clean Condensate Alternative (CCA) Technology as described in 40 CFR 63.447 is currently being used by the mill to comply with MACT I, Phase 2 emission reduction requirements for the existing Nos. 1 and 2 Mills Brown Stock Washing Systems, and Oxygen Delignification System.

The mill shall continue to use the CCA Technology as an alternative to complying with the requirements specified in §63.443(a)(1)(ii) through (a)(1)(v) for the control of HAP emission from the No. 1 Mill Brown Stock Washing System as described in 40 CFR 63.443(a), (c), and (d) after the installation of the two vacuum drum washers.

[40 CFR 63.443(a), (c), and (d), 40 CFR 63.447, and Rule 62-204.800, F.A.C.; Application No. 1230001-049-AC]

7. Compliance with the total HAP reductions through the use of the CCA technology requires the HAP reductions be calculated in pounds per ton of Oven Dried Pulp (ODP) basis and HAP emissions shall be measured according to the appropriate procedures stated in 40 CFR 63.457 .

[40 CFR 63.447(c), 40 CFR 63.441(def), and Rule 62-204.800, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### EU 046 Pulping Area/System (MACT I)

8. CCA technology is currently being used to comply with MACT I, Phase 2 emission reduction requirements from the No. 1 and 2 Mills Brown Stock Washer Systems and the Oxygen Delignification System. These emission reductions were previously calculated to be **0.08 lbs of total HAP per oven dried ton of pulp** for the No. 1 and 2 Mills Brown Stock Washer Systems and an additional **0.64 lbs of total HAP per oven dried ton of pulp for the Oxygen Delignification System**. This is in addition to the reduction of total HAP in the pulping condensates reduction requirements listed in 40 CFR 63.446 (i.e., **10.2 lbs of total HAP per oven dried ton of pulp**).

[40 CFR 63.446, 40 CFR 63.447, and Rule 62-204.800, F.A.C.; Construction Permit No. 1230001-034-AC]

#### COMPLIANCE DATE

9. Upon start-up as modified, the No. 1 Mill Brown Stock Washing System shall be in compliance with the emission reduction requirements stated in **Specific Condition No. 8**.

[40 CFR 63.5(b)(6), Rule 62-204.800, F.A.C.]

#### MONITORING, RECORDKEEPING, REPORTING, TESTING REQUIREMENTS AND PROCEDURES

10. The Permittee shall comply with the CCA (40 CFR 63.447), Monitoring (40 CFR 63.453), Recordkeeping (40 CFR 63.454), Reporting (40 CFR 63.455), Testing Requirements, Methods, and Procedures (40 CFR 63.457), and Table 1 to Subpart S of Part 63 – General Provisions Applicability to Subpart S.
11. Performance testing currently required by the Title V Air Operating Permit No. 1230001-044-AV to demonstrate compliance with CCA technology requirements for the Brown Stock Washer system and the Kraft pulping system condensate requirements may be used for the initial demonstration of compliance testing for the modified No. 1 Mill Brown Stock Washing System. Applicable calculations derived from testing report data shall be provided to the Compliance Authority demonstrating achieved total HAP reductions required by this permit.

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

12. Testing results shall be reported to the Compliance Authority within 45 days of completion of testing.

[Rule 62-297.310(8), F.A.C., 40 CFR 63.9(b)(5)(ii), Rule 62-204.800, F.A.C.]

13. A notification of the actual date of startup of the modified No. 1 Mill Brown Stock Washing System, delivered or postmarked within 15 calendar days after that date shall be sent to the Compliance Authority.

[40 CFR 63.9(b)(5)(ii), Rule 62-204.800, F.A.C.]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

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**EU 046 Pulping Area/System (MACT I)**

- 14** At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.453(q)]

- 15.** Recordkeeping of malfunctions. The owner or operator must maintain the following records of malfunctions:

- (1) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
- (2) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.453(q), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[40 CFR 63.454(g)]

- 16.** Malfunction reporting requirements. If a malfunction occurred during the reporting period, the report must include the number, duration and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.453(q), including actions taken to correct a malfunction.

[40 CFR 63.455(g)]