



# Florida Department of Environmental Protection

Northwest District  
160 W. Government Street, Suite 308  
Pensacola, Florida 32502-5740

Rick Scott  
Governor

Herschel T. Vinyard, Jr.  
Secretary

June 4, 2013

*Sent by Electronic Mail – Received Receipt Requested*  
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## **PERMITTEE**

International Paper Company  
375 Muscogee Road  
Pensacola, Florida 32533-0087

Air Permit No. 0330042-018-AC  
Permit Expires: June 4, 2014

Authorized Representative:  
Mr. Bretton C. DeJong, Mill Manager

Pensacola Mill  
Title V Source Air Construction Permit  
Operating Limit Change

This is the final air construction permit, which authorizes the facility to replace the total pulp production annual limit with an annual limit on black liquor solids fired in the recovery furnaces. The proposed work will be conducted at the Pensacola Mill, which is a Pulp and Paper Mill (Standard Industrial Classification No. 2621). The facility is located in Escambia County at 375 Muscogee Road in Cantonment, Florida. The UTM coordinates are Zone 16, 469 km East and 3386 km North; Latitude: 30° 36' 28.1" North and Longitude: 87° 19' 24.2" West. As noted in the Final Determination provided with this final permit, no changes 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, 62-213, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). Permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. 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.

**AIR CONSTRUCTION PERMIT**

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Executed in Pensacola, Florida

/s/

J. Charles Harp  
Program Administrator  
Waste Management/Air Resources  
Northwest District

**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 June 4, 2013 to the persons listed below.

Mr. Bretton C. DeJong, International Paper, [bretton.dejong@ipaper.com](mailto:bretton.dejong@ipaper.com)

Ms. Laurie McLain, International Paper, [laurie.mclain@ipaper.com](mailto:laurie.mclain@ipaper.com)

Mr. William V. Straub, P.E., All 4, Inc., [wstraub@all4inc.com](mailto:wstraub@all4inc.com)

Ms. Ana Oquendo, EPA Region 4, [oquendo.ana@epa.gov](mailto:oquendo.ana@epa.gov)

Ms. Natasha Hazziez, U.S. EPA Region 4, [hazziez.natasha@epa.gov](mailto:hazziez.natasha@epa.gov)

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

/s/  
Clerk

June 4, 2013  
Date

## SECTION 1. GENERAL INFORMATION

### FACILITY AND PROJECT DESCRIPTION

#### Existing Facility

The existing facility is a Kraft pulp and paper mill consisting of a wood handling facility, digesters, brown stock washers, oxygen delignification, bleaching facilities, paper machines and associated equipment.

The facility consists of Recovery Furnaces Nos. 1 and 2; Power Boilers Nos. 3, 4, 5, and 6; Smelt Dissolving Tanks Nos. 1 and 2; a Lime Kiln; a Lime Slaker; Tall Oil Processing; B-Line Bleach Plant; Nos. 1 and 2 Multiple Effect Evaporator (MEE) Sets; Pulping System; Paper Machine Operations; Woodyard Activities; Non-Condensable Gas (NCG) Handling System; a Thermal Oxidizer; Tail Gas Scrubber and a Chlorine Dioxide Generator and Storage Operation.

The existing facility consists of the following emissions units.

Facility ID No. 0330042	
ID No.	Emission Unit Description
030	Recovery Furnace No. 1
029	Recovery Furnace No. 2
033	Power Boiler No. 3
037	Power Boiler No. 4
002	Power Boiler No. 5
003	Power Boiler No. 6
032	Smelt Dissolving Tank No. 1
038	Smelt Dissolving Tank No. 2
028	Lime Kiln, Mud Dryer System
001	Tall Oil Processing
049	Tail Gas Scrubber, Chlorine Dioxide (ClO <sub>2</sub> ) Generator and ClO <sub>2</sub> Storage Tanks
051	B Bleach Plant Line
055	No. 1 & 2 Multiple Effect Evaporator Sets
067	Thermal Oxidizer
046	Lime Slaker
044	Dry Additives, Starch Receiving and Storage
052	Woodyard Activities (Fines Cyclone)
063	Low Volume High Concentration Non -Condensable Gas Handling System
065	No. 2 Condensate Stripper
069	Pulping System
070	B-Line No. 1 Brown Stock Washing Line
071	B-Line No. 2 Brown Stock Washing Line
072	Diffusion Washer
073	B-Line O <sub>2</sub> Delignification
066	Unregulated Emissions Units (see Appendix U)

## SECTION 1. GENERAL INFORMATION

### Proposed Project

The proposed project authorizes the facility to replace the total pulp production annual limit with an annual limit on black liquor solids (BLS) fired in the recovery furnaces. This change is being requested to allow the facility to use the additional plant capacity achieved through Project Onyx, which allowed physical changes to the Mill's pulping operations to use 100% softwood. The projected increases in emissions of VOC, NOx and PM that will result from increased pulp production, will be mitigated through a combination of permanent equipment shut down associated with Project Onyx and by eliminating the use of biomass fuel, fuel oil and used oil in Power Boiler No. 3 and by limiting the amount of coal fired in that boiler, with the remainder of annual heat input coming from natural gas.

There are no physical changes associated with this project. The proposed project includes the following operational changes:

1. Remove the total pulp production limit of 694,373 air-dried tons of unbleached pulp (ADTUP) per year.
2. Establish a federally enforceable limit for the combined amount of black liquor solids generated and combusted in the Mill's two recovery furnaces of no more than 950,000 tons per year.
3. Change the fuel mixture for Power Boiler No. 3 as follows:
  - a) Fire natural gas as the primary fuel.
  - b) Establish a federally enforceable limit for coal fired of no more than 5,000 tons per year.
  - c) Eliminate the use of biomass (wood waste) fuel, fuel oil and used oil.

This project will affect the following emissions units.

<b>Facility ID No. 0330042</b>	
ID No.	Emission Unit Description
001	Tall Oil Processing
029	Recovery Furnace No. 2
030	Recovery Furnace No. 1
032	Smelt Dissolving Tank No. 1
033	Power Boiler No. 3
038	Smelt Dissolving Tank No. 2
051	B Bleach Plant Line
052	Woodyard Activities (Fines Cyclone)
055	Nos. 1 & 2 Multiple Effect Evaporator Sets
063	Low Volume High Concentration Non -Condensable Gas (NCG) Handling System
065	No. 2 Condensate Stripper
070	B-Line No. 1 Brown Stock Washing Line
071	B-Line No. 2 Brown Stock Washing Line
072	Diffusion Washer
073	B-Line O <sub>2</sub> Delignification
067	Thermal Oxidizer
069	Digester Pulping System (No. 1 thru No. 12 and Kamy Continuous Digester)
<b>Unregulated Emissions Units affected by this Project (See Appendix U for complete listing.)</b>	
066	Pine Chip Thickness Screening System
066	Woodyard – Other Sources

## SECTION 1. GENERAL INFORMATION

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053	Digesters and Brown Stock Washers - Other Sources
066	B Line Bleach Plant - Other Sources
062	B Line EO Washer
066	Evaporators - Other Sources
066	Recovery Area - Other Sources
043	P5 Paper Machine
066	No. 4 Pulp Dryer
066	Turpentine Storage
066	Tall Oil - Other Sources
066	Miscellaneous Sources

### 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.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting authority for this project is the Northwest District Waste Management/Air Resources Program, Florida Department of Environmental Protection (Department). The District's mailing address is 160 W Government Street, Suite 308, Pensacola, Florida 32502-5740. All documents related to applications for permits to operate an emissions unit shall be submitted to the District Office.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the District Office at the above address or [nwdair@dep.state.fl.us](mailto:nwdair@dep.state.fl.us).
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. Attachment - Stack Testing
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. Asbestos: This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]
6. 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.]
7. Modifications: Permittee shall notify the Permitting and Compliance Authorities upon commencement of construction. Notification may be submitted by electronic mail to [nwdair@dep.state.fl.us](mailto:nwdair@dep.state.fl.us) and copied to the permitting authority at [epost\\_nwdwastear@dep.state.fl.us](mailto:epost_nwdwastear@dep.state.fl.us). 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.]
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.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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(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. 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. 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. You can obtain a permit application form or apply for permit renewal electronically at the following web address: <http://www.dep.state.fl.us/air/emission/permitting.htm>. [Rules 62-4.030, 62-4.050 and Chapter 62-213, F.A.C.]
10. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and 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. 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 ten years following resumption of regular operations after the change. *Where applicable, reliable actual emissions information for these units shall be obtained through stack testing, in accordance with the Compliance Testing Requirements provided in Appendix D of this permit.* 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. Permittee shall report to the Department within 60 days after the end of each calendar year during the ten-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.;
    - 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.

For this project, the Department requires the annual reporting of actual emissions of volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), sulfuric acid mist (SAM or H<sub>2</sub>SO<sub>4</sub>), total reduced sulfur (TRS), and particulate matter (PM/PM<sub>10</sub>/PM<sub>2.5</sub>) from the following units:

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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EU I.D.	Reg/Unreg	EU Description
054	U	A-Line Kamyr Digester and Brown Stock Washers
061	U	A-Line Bleach Plant EO Washer ( <i>Shutdown</i> )
051	R	B-Line Bleach Plant Scrubber
067	R	Thermal Oxidizer
052	R	Woodyard Activities
050	U	A-Line Bleach Plant Scrubber ( <i>Shutdown</i> )
053	U	B-Line Batch Digesters and Brown Stock Washers
063	R	LVHC NCG Handling
066	U	Unregulated, the P3 Paper Machine ( <i>Shutdown</i> ), P5 Paper Machine, No. 4 Pulp Dryer, A-Line Diffusion Washing and the A-Line O <sub>2</sub> Decker System
069	R	Pulping System
029	R	Recovery Furnace No. 2
030	R	Recovery Furnace No. 1
032	R	Smelt Dissolving Tank No. 1
038	R	Smelt Dissolving Tank No. 2
001	R	Tall Oil Processing

Project Onyx (project 0330042-012-AC) began actual emissions reporting for PSD in 2008 for ten years. With changes in project 0330042-018-AC, actual emissions reporting for ten years is reset, with report one being for emissions year 2014. Actual emissions reporting for project 0330042-012-AC shall continue until the Mill begins reporting actual emissions as required above for project 0330042-018-AC.

[Rules 62-212.300(1)(e) and 62-210.370, F.A.C., and Application 0330042-018-AC]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. Emissions Units 029 & 030

This section of the permit addresses the following emissions units.

EU No.	Brief Description
030	Recovery Furnace No. 1 - started up June 20, 1975
029	Recovery Furnace No. 2 - started up June 23, 1975

These emissions units consist of low odor design recovery furnaces manufactured by Babcock and Wilcox. Black liquor is normally used for fuel but natural gas, No.2, No. 4, No. 5, and No. 6 fuel oils may be used as a backup fuel at a maximum heat input rate of 572 MMBtu/hr. Each unit has a Koppers dual chamber electrostatic precipitator to control particulate emissions. Total reduced sulfur emissions are monitored with a continuous emission monitor (CEM) system. These emissions units are regulated under Rule 62-296.404, F.A.C., Kraft Pulp Mills and 40 CFR 63, Subpart MM - (Emission Standards for Chemical Recovery Sources).

Permittee requested permission to replace the Mill's total pulp production limit of 694,373 ADTUP per year with a limit on the combined amount of black liquor solids generated and combusted in the Mill's two recovery furnaces of no more than 950,000 tons per year. Total Mill throughput will be limited by the maximum allowable BLS throughput rate for the recovery furnaces rather than by total pulp production.

**The following specific conditions apply to the emissions unit(s) listed above:**

**A.1. Previous Permits.** This permit supplements all previously issued air construction and operation permits for this emissions unit. Except for the changes noted below, the unit remains subject to the conditions of all other legally binding air construction and operating permits. [Rules 62-4.070(3) and 62-210.300(1), F.A.C.]

#### **Essential Potential to Emit (PTE) Parameters**

**A.2. Permitted Capacity.** The maximum allowable operating rates are as follows:

EU No.	lbs Virgin Black Liquor Solids/hr (averaged daily)
030	127,500
029	128,333

[Rules 62-4.160(2), 62-4.070(3), 62-210.200(PTE) and 62-296.404, F.A.C.; and Application 0330042-018-AC]

*{Permitting Note: For EU030/EU029, these virgin BLS firing rates are equivalent to burning 138,587/139,492 pounds per hour as-fired black liquor solids, and recovering 48,610/48,927 pounds per hour of molten smelt.}*

**A.3. Black Liquor Solids (BLS) as Fuel.** The maximum annual throughput for Recovery Furnaces Nos. 1 & 2 combined shall not exceed 950,000 tons of virgin BLS per calendar year.

[Rules 62-4.160(2), 62-4.070(3), 62-210.200(PTE) and 62-296.404, F.A.C.; and Application 0330042-018-AC]

#### **Recordkeeping and Reporting Requirements**

**A.4.** Permittee shall keep monthly records of the quantity of virgin BLS combusted in each Recovery Furnace in pounds per hour, daily averages, and daily and monthly totals. These records shall be maintained on site for a period of five years and made available for inspection by the Department.

[Rules 62-4.160(2) and 62-4.070(3), F.A.C.; and Application 0330042-018-AC]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### B. Emissions Units 032 & 038

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
032	Smelt Dissolving Tank No. 1 - started up in June 1975
038	Smelt Dissolving Tank No. 2 - started up in June 1975

Each Smelt Dissolving Tank receives molten smelt from the recovery furnaces, consisting primarily of sodium carbonate, sodium sulfide and sodium sulfate. The smelt is dissolved in weak wash to yield green liquor for the slaking process. Particulate matter and reduced sulfur emissions from these emissions units are controlled by a wet venturi scrubber manufactured by Neptune Airpol, Inc. These units are regulated under Rule 62-296.404, F.A.C., Kraft Pulp Mills and 40 CFR 63, Subpart MM (MACT II), NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills.

The following specific conditions apply to the emissions unit(s) listed above:

**B.1. Previous Permits.** This permit supplements all previously issued air construction and operation permits for this emissions unit. Except for the changes noted below, the unit remains subject to the conditions of all other legally binding air construction and operating permits. [Rules 62-4.070(3) and 62-210.300(1), F.A.C.]

#### Essential Potential to Emit (PTE) Parameters

**B.2. Permitted Capacity.** For compliance testing purposes, the maximum allowable black liquor solids operating rates are as follows:

EU No.	lbs Virgin Black liquor solids/hr (averaged daily)	Fuel Type
032	128,333	Black liquor solids
038	127,500	Black liquor solids

[Rules 62-4.160(2), 62-4.070(3), 62-210.200(PTE) and 62-296.404, F.A.C.; and Application 0330042-018-AC]

*{Permitting Note: For EU032/EU038, these virgin BLS firing rates are equivalent to burning 139,492/138,587 pounds per hour as-fired black liquor solids, and recovering 48,927/48,610 pounds per hour of molten smelt. The operating rate limitations have been placed in the permit to identify the capacity of each emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability.}*

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**C. Emission Unit 033**

This section of the permit addresses the following emission unit.

<b>ID No.</b>	<b>Emissions Unit Description</b>
033	Power Boiler No. 3 - started up October 29, 1973

Power Boiler No. 3 was manufactured by Riley and is fueled by natural gas or coal. Rated capacity is 347 MMBtu/hr heat input if fueled by natural gas or 268 MMBtu/hr if fueled with 100% coal. Particulate emissions are controlled by multi-cyclones followed by a venturi wet scrubber manufactured by Neptune Airpol, Inc. Sulfur dioxide emissions are controlled by the sulfur content of the fuels and by addition of sodium hydroxide to the scrubber fluid to control pH. The boiler has a CEM for SO<sub>2</sub>, NO<sub>x</sub> and O<sub>2</sub>. A continuously monitored pressure drop has been approved in lieu of a CEM for opacity. This emission unit is regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators. Power Boiler No. 3 is also subject to the requirements of 40 CFR 63, Subpart DDDDD – NESHAP for Industrial, Commercial and Institutional Boilers and Process Heaters, referred to as Major Source Boiler MACT, which was promulgated on January 31, 2013 at 78 FR 7138. The effective date for the regulation was April 1, 2013 and the compliance date is January 31, 2016.

This permit eliminates the use of biomass fuel (carbonaceous fuels), fuel oil and used oil in this boiler and establishes a federally enforceable limit for coal fired in this boiler of no more than 5,000 tons per year, with the balance of annual heat input coming from natural gas.

**The following specific conditions apply to the emissions unit(s) listed above:**

**C.1. Previous Permits.** This permit supplements all previously issued air construction and operation permits for this emissions unit. Except for the changes noted below, the unit remains subject to the conditions of all other legally binding air construction and operating permits. [Rules 62-4.070(3) and 62-210.300(1), F.A.C.]

**Essential Potential to Emit (PTE) Parameters**

**C.2. Permitted Capacity.** The maximum allowable heat input rates are as follows:

<b>EU No.</b>	<b>Maximum Heat Input (MMBtu/hr), averaged daily</b>	<b>Fuel Type</b>
033	347	Natural gas
033	268	Coal

[Rules 62-4.160(2), 62-4.070(3), 62-210.200(PTE) and 62-296.405, F.A.C.; and Application 0330042-018-AC]

**C.3. Methods of Operation (Fuels)**

Fuel oil, used oil or carbonaceous fuels are not allowed as fuels in Power Boiler No. 3.

The fuels that are allowed to be burned in this unit are:

- (1) Natural gas, primary fuel,
- (2) Coal (maximum 4.0% sulfur by dry weight)

[Rules 62-4.160(2), 62-4.070(3), 62-213.410 and 62-213.440(1) F.A.C.; and Application 0330042-018-AC]

**C.4. Coal as Fuel.** The quantity of coal that may be consumed in Power Boiler No. 3 shall not exceed 5,000 tons per calendar year.

[Rules 62-4.160(2), 62-4.070(3) and 62-210.200(PTE), F.A.C.; and Application 0330042-018-AC]

**Recordkeeping and Reporting Requirements**

**C.5.** Permittee shall keep monthly records of the types and quantities of fuels combusted in Power Boiler No. 3 in pounds per hour, daily averages, and daily and monthly totals. These records shall be maintained on site for a period of five years and made available for inspection by the Department.

[Rules 62-4.160(2) and 62-4.070(3), F.A.C.; and Application 0330042-018-AC]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

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**C. Emission Unit 033**

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

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**D. Emission Unit 055**

This section of the permit addresses the following emission unit.

ID No.	Emissions Unit Description
055	Nos. 1 & 2 Multiple Effect Evaporator (MEE) Sets

These evaporator sets are used to concentrate the weak black liquor prior to firing in the recovery furnaces. The off-gas from the evaporators vents into the NCG handling system and is combusted in the thermal oxidizer or lime kiln as a backup. This emissions unit is regulated by 40 CFR 63, Subpart S - National Emissions Standards for Hazardous Air Pollutants from the Pulp and Paper Industry.

Permittee requested permission to remove the maximum operating rate limitation for this emissions unit because the evaporator sets are in series with the recovery furnaces and can only concentrate weak black liquor at the rate at which the recovery furnaces can combust the BLS. Based on the fact that the throughput rate for this unit is determined by the throughput rate for the recovery furnaces, and the fact that the recovery furnaces are subject to maximum allowable BLS throughput rates, it is unnecessary to include operating limits for this unit. Additionally, because the unit does not vent to the atmosphere during normal operation, testing and recordkeeping is not required.

**The following specific conditions apply to the emissions unit(s) listed above:**

**D.1. Previous Permits.** This permit supplements all previously issued air construction and operation permits for this emissions unit. Except for the changes noted below, the unit remains subject to the conditions of all other legally binding air construction and operating permits. [Rules 62-4.070(3) and 62-210.300(1), F.A.C.]

**D.2. Capacity, Testing and Recordkeeping.** Operating limits, testing and recordkeeping requirements for this emissions unit are hereby removed. The MEE sets are allowed to operate at the rate required to meet the combined operating rate of the Mill's two recovery furnaces. [Rules 62-4.160(2) and 62-4.070(3), F.A.C.; and Application 0330042-018-AC]

*{Permitting Note: This emissions unit no longer vents to the atmosphere during normal operation. This emissions unit currently vents to the Non-Condensable Gases handling system.}*

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

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**E. Emission Unit 063**

This section of the permit addresses the following emission unit.

ID No.	Emissions Unit Description
063	Low Volume High Concentration (LVHC) Non-Condensable Gas (NCG) Handling System, Started up November 28, 1989

This emission unit collects non-condensable gases containing total reduced sulfur compounds. These gases are collected from twelve batch digesters processed through two blow tanks, a primary condenser and a secondary condenser; a Kamyr continuous digester processed through three flash tanks, a stripper reboiler and a secondary condenser; No. 2 condensate stripper; and No. 1 & 2 Multiple Effect Evaporator Sets. Total reduced sulfur emissions are controlled by combustion in the Thermal Oxidizer (EU 067) or Lime Kiln (EU 028) as a backup. This emissions unit is regulated by 40 CFR 63, Subpart S - National Emissions Standards for Hazardous Air Pollutants from the Pulp and Paper Industry.

This project will cause the NCG load on the Thermal Oxidizer to increase due to increased pulp production.

Permittee requested permission to replace the Mill's total pulp production limit of 694,373 ADTUP per year with a federally enforceable limit on the combined amount of BLS generated and combusted in the Mill's two recovery furnaces of no more than 950,000 tons per year.

**The following specific conditions apply to the emissions unit(s) listed above:**

**E.1. Previous Permits.** This permit supplements all previously issued air construction and operation permits for this emissions unit. Except for the changes noted below, the unit remains subject to the conditions of all other legally binding air construction and operating permits. [Rules 62-4.070(3) and 62-210.300(1), F.A.C.]

**Essential Potential to Emit (PTE) Parameters**

**E.2. Capacity.** For compliance testing purposes, the anticipated daily maximum operating rate for the Batch Digester System (B Line) is 928 ADTUP per day, and the anticipated daily maximum operating rate for the Kamyr Digester System (A Line) is 1,807 ADTUP per day. [Rules 62-4.160(2) and 62-4.070(3), F.A.C.; and Application 0330042-018-AC].

*{Permitting Note: The daily maximum operating rate represents a peak short-term production rate that the Mill will be able to achieve and is referenced in this permit to identify the capacity of each digester system for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability.}*