Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

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

Air Permit Number: 1230001-037-AC
Date of Issue: October 25, 2011
Expiration Date: October 25, 2012

Authorized Representative:
Mr. Howard A. Drew

Project: Transformer Process

PROJECT AND LOCATION

This final air construction permit authorizes the construction of the transformer process, in which a portion of the bleached pulp from the No. 2 Purification Plant is chemically treated, dried and baled. 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

Christopher L. Kirts, P.E.
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 10/25/2011 to the persons listed below.

Mr. Howard A. Drew, Buckeye Florida, Limited Partnership [Email: howard_drew@bkitech.com]
Dave Weeden, Buckeye Florida, Limited Partnership [Email: dave_weeden@bkitech.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.

10/25/2011

(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.

REGULATED EMISSIONS UNITS AFFECTED BY PROJECT:

Emission Unit	Description
051	Transformer Process

PROPOSED PROJECT

This project will involve the construction of the transformer process, in which bleached pulp is chemically treated, dried and baled. Bleached pulp from the No. 2 Purification Plant will be diverted to the new process upstream of the No. 2 Mill Paper Machine. The pulp will then undergo a chemical fiber modification using a proprietary chemical, followed by a chemical recovery process. The enhanced clean fibers will then be bulk-dried in a tunnel dryer using ambient air. The dried fibers will then be baled in a conventional baler, then wrapped and bound for shipment to customers. To address the issue of slower speeds on the No. 2 Paper Machine and increased moisture content of the pulp, additional dryer drums will be installed.

This process includes three air emission points (EPs). Pneumatic systems are used to transport the fibers from the chemical recovery to the dryer and from the dryer to the baler. In each of these transitions, a cyclone is used that will exhaust to the atmosphere (EPs 01 and 03). The tunnel dryer will also have an atmospheric exhaust (EP 02).

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)

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) 256-1700. 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: 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.

[Rule 62-212.400(12)(b), 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. 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.]

This section of the permit addresses the following emissions units:

ID	Emission Unit Description
051	**Transformer Process:** This unit chemically treats, then dries and bales bleached pulp from the No. 2 Purification Plant. This emissions unit has a maximum processing rate of 6.89 tons of air-dried bleached pulp (ADBP) per hour. Particulate matter emissions are exhausted to the atmosphere.
EP 01	**Wet Pulp Feed to Dryer Cyclone:** At permitted capacity, the exhaust gas flow rate is 62,500 acfm with an exit temperature of 110° F. Exhaust gases exit a stack that is 5.0 feet in diameter and 50 feet tall.
EP 02	**Tunnel Dryer:** At permitted capacity, the exhaust gas flow rate is 36,000 acfm with an exit temperature of 230° F. Exhaust gases exit a stack that is 3.5 feet in diameter and 50 feet tall.
EP 03	**Dry Pulp Feed to Baler Cyclone:** At permitted capacity, the exhaust gas flow rate is 16,000 acfm with an exit temperature of 110° F. Exhaust gases exit a stack that is 3.0 feet in diameter and 50 feet tall.

APPLICABILITY OF PREVIOUS PERMITS

1. Relation to Other Permits: The conditions of this permit will supplement and comply with conditions of all existing, valid, Department permits.
   [Rules 62-4.210, 62-4.030, and 62-210.300(1)(b), F.A.C.]

EQUIPMENT

2. Transformer Process: The permittee is authorized to construct the transformer process, which includes the following equipment and emission points:
   a. Fiber Modification Unit
   b. Chemical Recovery Unit
   c. Wet Pulp Feed to Dryer Cyclone (EP 01)
   d. Tunnel Dryer (EP 02)
   e. Dry Pulp Feed to Baler Cyclone (EP 03)
   f. Fiber Baler

   [Application No. 1230001-037-AC]

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

3. Maximum Throughput: The maximum throughput of the unit is 165.34 tons/day (TPD) of air-dried bleached pulp (ADBP).
   [Rules 62-4.070(3), 62-210.200(PTE), F.A.C., Application No. 1230001-037-AC]

4. Hours of Operation: The hours of operation are not restricted, i.e. 8760 hours/year.
   [Rules 62-4.070(3), 62-210.200(PTE), F.A.C., Application No. 1230001-037-AC]

RECORDKEEPING

5. Equipment Information Submittal: Within 15 days of installation of the equipment and prior to its startup, the permittee shall submit the specific equipment vendor information to the Department in a written format.
[Rule 62-4.070(3), F.A.C.]

6. Recordkeeping: The owner or operator shall keep a record onsite of the annual throughput rate of the transformer process in either paper copy or electronic format, unless the Department approves another format. This record shall be made available to the Department or for an inspector's onsite review upon request.
[Rule 62-4.070(3), F.A.C.]

7. Record Retention: The owner or operator shall keep records as described by specific condition No. 6 for at least 5 years.
[Rule 62-4.070(3), F.A.C.]

This section of the permit addresses the following emissions units:

ID	Emission Unit Description
049	**Drying/Converting/Warehouse:** This unregulated emission unit includes the No. 2 Paper Machine, which dries a portion of the pulp coming from the No. 2 Purification Plant.

EQUIPMENT

8. No. 2 Paper Machine: The permittee is authorized to replace four dryer drums and to add two additional drums and an additional steam flash tank.
[Application No. 1230001-037-AC]