

Bele 41



Department of Environmental Protection

Jeb Bush
Governor

David B. Struhs
Secretary

NOTICE OF PERMIT

CERTIFIED-RETURN RECEIPT

April 5, 2002

Mr. Theodore D. Kennedy
Vice President, Palatka Operations
Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178

Dear Mr. Kennedy:

Putnam County – AP
Georgia-Pacific Corporation
Modification of Air Construction Permit No. 1070005-007-AC
AIRS ID Number: 1070005

Enclosed is Permit Number 1070005-017-AC to modify the subject air pollution emissions unit(s), issued pursuant to Section 403.087, Florida Statutes (F.S.).

Any party to this order has the right to seek judicial review of it under Section 120.68 of F.S., 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 thirty days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Christopher L. Kirts, P. E.
District Air Program Administrator

idk
CLK: HL

cc: Office of General Counsel - Air Permitting
David A. Buff, P.E., GAI
Myra Carpenter, Superintendent of Environmental Affairs, GP

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Christopher G. Smith 4/9/02
Clerk Date

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.



Jeb Bush
Governor

Department of Environmental Protection

David B. Struhs
Secretary

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam
Latitude/Longitude: 29° 41' 00" N; 81° 40' 45" W
UTM: E-(17) 434.0; N-3283.4
Project: MACT I Compliance:
No. 4 Combination Boiler, EU # 016
Thermal Oxidizer, EU #037
Condensate Stripper, EU #037
Two pre-scrubbers
Candle mist eliminator filter
Foul Condensate Feed Tank
3rd Effect added to Pre-Evaporator

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Georgia Pacific Palatka has experienced some onsite impacts (a visible plume and odors believed to be caused from sulfuric acid mist (SAM) emissions) with the operation of the thermal oxidizer as permitted under Air Construction Permit No. 1070005-007-AC (issued August 21, 2000). To address these on-site impacts, Georgia Pacific proposes to:

- 1) Reroute the LVHC NCG streams to two pre-scrubbers for sulfur removal prior to destruction in the Thermal Oxidizer.
- 2) Install a candle mist eliminator filter after the existing wet SO₂ scrubber following the thermal oxidizer for sulfuric acid mist (SAM) emissions reduction.
- 3) Increase the thermal oxidizer stack height from 100 to 250 ft.

During the period of time when the aforementioned changes are being implemented, and the thermal oxidizer is being re-started, Georgia Pacific will route the Low Volume High Concentration (LVHC) Noncondensable gases (NCGs) and the stripper off gases (SOGs) to the No. 4 Combination Boiler (the secondary control device for MACT I) for destruction.

This may occur for a period not to exceed one year from the time of issuance of this construction permit.

Should Georgia Pacific experience problems with the No. 4 Combination Boiler during this period, the facility has elected to shut down the process sources that generate the LVHC NCGs and SOGs in order to maintain compliance with the MACT I rule and TRS regulations.

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.:1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

Project Description Continued:

The projects are described as follows:

Project 016: To convert the existing TRS Incinerator scrubber from a packed tower to a spray tower and utilizing it as a pre-scrubber to the thermal oxidizer. Georgia Pacific will convert the scrubber by removing the packing materials in the scrubber and installing spray nozzles instead. The pre-scrubber will be used to remove the sulfur from the LVHC NCG gases prior to destruction in the thermal oxidizer. The sulfur removal efficiency will be maintained at 50 percent or greater.

Project 017: For the installation of a new spray tower to remove the sulfur from the LVHC NCG streams from the batch NCG system (NCGs from the batch digester Accumulator), and the converted pre-scrubber (described under Project 016) to collect the LVHC NCG streams from the continuous LVHC NCG streams (NCGs from Pre-evaporator Hotwell, No.1 to No.4 Evaporator Hotwell) for sulfur removal prior to destruction in the Thermal Oxidizer.

For the installation of a candle mist eliminator filter after the existing SO₂ wet scrubber following the thermal oxidizer for sulfuric acid mist (SAM) emissions reduction.

For the increase of the thermal oxidizer stack height from 100 to 250 ft.

For the revision of the maximum condensate stripper flow rate from 950 gpm to 800 gpm.

For the rerouting of the LVHC NCG and SOGs to the No. 4 Combination Boiler for destruction during the period of time necessary to implement the changes listed under Projects Nos. 016 and 017. This period shall not exceed the one-year timeframe as stated above.

After the maximum one-year timeframe stated above ends: For the increase of the maximum uptime of the No. 4 Combination Boiler as the secondary destruction/control device from 10 to 20 percent.

For the sulfur content reduction to 2.35%, by weight, in the No. 6 fuel oil for all the fuel fired sources.

PERMITTEE:

Georgia-Pacific Corporation
 Post Office Box 919
 Palatka, Florida 32178-0919

I.D. Number: 1070005
 Revised Draft Permit No.: 1070005-017-AC
 Date of Issue: April 5, 2002
 Expiration Date: October 5, 2003
 County: Putnam

Project Description Continued:

Emission Unit Description:

After the maximum, one year period as described above, Georgia Pacific shall operate the equipment necessary for compliance with the kraft pulping systems standards of 40 CFR Part 63, Subpart S (MACT I), as described in Air Construction Permit No. 1070005-007-AC, with the following exceptions:

1. The NCGs from the foul condensate collection tank (used to receive foul condensates from throughout the mill) will be tied into the existing LVHC NCG system for destruction in the thermal oxidizer.
2. The stripper off-gases from the condensate stripper (used to treat foul condensates) will be routed via a separate piping system to the thermal oxidizer for the destruction.
3. The Thermal Oxidizer will accommodate the NCGs from the two pre-scrubbers, the foul condensate tank, the stripper off-gases from the condensate stripper, and the turpentine decanter underflow seal tank.
4. A candle mist eliminator filter will be installed after the existing SO₂ wet scrubber following the Thermal Oxidizer for sulfuric acid mist (SAM) emissions reduction.
5. Georgia Pacific Palatka will use the No. 4 Combination Boiler as the secondary control device to the Thermal Oxidizer for incineration of the NCG/SOG gas streams. The maximum uptime as a secondary destruction device shall not exceed 20 percent.
6. The maximum condensate stripper flow rate will be 800 gpm.
7. Sulfur content in the No.6 fuel oil for all the fuel fired sources will be 2.35%, by weight.

The following is a summary of the emissions changes due to the destruction of the LVHC NCGs and SOGs to the No. 4 Combination Boiler:

		Pollutants Emission Rate (TPY)							
		SO ₂	NO _x	CO	PM/PM10	TRS	VOC	SAM	HAPs
100% Time	• No. 4 Combination Boiler	2,743.6	189.2	---	---	2.4	9.1	109.7	---

*Above Significant Threshold. A Pollution Control Project (PCP) Exclusion was granted pursuant to 62-212.400(2)(a)2.b.

The following is a summary of the emissions changes due to destruction of the LVHC NCGs and SOGs to the Thermal Oxidizer and the No. 4 Combination Boiler:

		Pollutants Emission Rate (TPY)							
		SO ₂	NO _x	CO	PM/PM10	TRS	VOC	SAM	HAPs
80% Time	• New Thermal Oxidizer	109.7	151.4	8.8	30.7	0.89	9.1	7.7	1.6
20% Time	• No. 4 Combination Boiler	548.7	37.8	---	---	0.47	---	21.9	---

*Above Significant Threshold. A Pollution Control Project (PCP) Exclusion was granted pursuant to 62-212.400(2)(a)2.b.

Located: north of County Road 216, West of U.S. Highway 17, Palatka, Putnam County, Florida.

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.:1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

In accordance with:

MACT I Construction Permit No. 1070005-007-AC issued August 21, 2000
Applications for Construction Permit Modification Received November 15 and November 19, 2001
Additional Information from Applicant Received January 7, 2002
Comments from Applicant Received December 7, 2001, February 1 and February 3, 2002
Comments from Mr. Bruce Michell at DARM Received December 7, 2001, January 10, February 4 and 5, 2002
Comments from Mr. Syed Arif at DARM Received January 22, 2002
Comments from Ms. Patricia Comer at OGC Received February 5, 2002
Revised Ambient Impact Analysis for MACT I Compliance PCP Received December 11, 2001
Additional Information about the Modeling Received January 22, 2002
Additional Information from Applicant Received February 21 and March 7, 2002

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys not title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permitted to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any record that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

GENERAL CONDITIONS:

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of non-compliance; and
- b. The period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards (NSPS)
- (x) Compliance with National Emission Standards for Hazardous Air Pollutants/ Maximum Available Control Technology (MACT)

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.:1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

GENERAL CONDITIONS:

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurement;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

The following conditions apply to Emission Unit 016 (No. 4 Combination Boiler):

Operational Parameters

1. Permitted Capacity. The maximum heat input rate shall not exceed either:

Maximum Heat Input Rate (MMBtu/hr)	Fuel Options
512.7 ¹	Carbonaceous fuel only or Carbonaceous fuel in combination w/fuel oil
418.6 ¹	Fuel oil only

¹ Shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average. [Permit No.AC54-163040; Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

2. Methods of Operation. This boiler shall be fired with following fuels:
- a. No.6 fuel oil with a sulfur content that shall not exceed 2.35% by weight and on-spec used oil.
 - b. Natural gas as a startup fuel. The natural gas may be kept on pilot for flame safety.
 - c. NCGs and/or SOGs during periods when the boiler is being utilized for their destruction.
- [Construction Permit Application, Request by Applicant received June 21, 2000]

Emission Limits and Standards

- 3.a. Particulate Matter Emissions shall not exceed the following:

Fuel Options	Emissions Limitation		
	lb/MMBtu	lb/hr	TPY
Carbonaceous fuel only	0.3	125.6 ¹	550.1
Fuel oil only	0.1	41.9 ¹	183.5
Carbonaceous fuel in combination w/fuel oil	The allowable particulate matter emissions shall be determined using the rate factors by fuel type listed above and the heat input from each fuel type.		

¹Based on the time period specified by the method of compliance. [Rule 62-296.410(1)(b)2., F.A.C.; Permit No. AC54-163040]

- b. Visible Emissions shall not exceed 30% opacity except that 40% opacity is permissible for not more than two minutes in any one-hour. [Rule 62-296.410(1)(b)1., F.A.C.; Permit No. AC54-163040]

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

SPECIFIC CONDITION No. 3 continued:

- c. Sulfur Dioxide Emissions shall not exceed the following:

Fuel Options	Emissions Limitation		
	Sulfur Content	lb/hr	TPY
----	≤ 2.35%, by weight	1,701.9	5,259.5

*Includes additional SO₂ emissions due to NCG burning and SOG burning of 626.4 lbs/hr and 548.7 TPY, and assumes the following:

1. The burning of any NCG and/or SOG for a partial hour is deemed as a full hour of SO₂ contribution;
2. For just NCG burning, the contribution is considered to be 302.4 lbs/hr of SO₂, regardless of the amount of NCGs burned;
3. For just SOG burning, the contribution is considered to be 324.0 lbs/hr of SO₂, regardless of the amount of SOGs burned;
4. For simultaneous NCG and SOG burning, the contribution is considered to be 626.4 lbs/hr of SO₂, regardless of the amount of NCGs and SOGs burned together;
5. The total SO₂ emissions, in tons, attributed to any NCG and/or SOG burning, shall be the sum of the previous NCG and/or SOG burning conducted during the year to date; and,
6. The burning of NCGs and/or SOGs shall cease when the sum of the SO₂ emissions reaches the yearly allowable limitation of 548.7 tons.

[Permit No. AC54-163040, PCP Exclusion dated March 14, 2002]

- d. Total Reduced Sulfur (TRS) Emissions. TRS emissions shall not exceed 5 ppm by volume on a dry basis at standard conditions corrected to 10 percent oxygen as a 12-hour average; and 0.54 lb/hr and 0.47 TPY [Rule 62-296.404(3)(f)1., F.A.C.]

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

Test Methods and Procedures

- 4.a. Particulate Matter Emissions. The test method for particulate matter shall be EPA Method 5, incorporated in Chapter 62-297, F.A.C.
- b. Visible Emissions. The test method for visible emissions shall be EPA Method 9, incorporated in Chapter 62-297, F.A.C.
- c. Sulfur Dioxide Emissions. NCGs and/or SOGs may be burned in the No. 4 Combination Boiler. For purposes of this condition, SO₂ emissions due to fuel oil burning will be determined by the total gallons of fuel oil fired as follows:

$$\begin{aligned} & (\%S \text{ oil}/100) \times 8.2 \text{ lb/gal} \times 2 \text{ lb SO}_2/\text{lb S} = (0.0164 \times \%S) \text{ lb SO}_2/\text{gal} \\ & (0.164 \times \%S) \text{ lb SO}_2/\text{gal} \times \text{gallons of fuel oil fired} = \text{lb SO}_2 \end{aligned}$$

In lieu of stack testing, the facility shall maintain records of the following:

- The date and time NCGs / SOGs are fired in the boiler,
- The sulfur content of the fuel oil fired,
- The amount (gallons) of fuel oil fired,
- The certified on-specification used oil analysis (when on-spec used oil is fired).

A SO₂ emissions report of the above data shall be submitted to the Compliance Section of the Northeast District Office on an annual basis with a frequency base date of 08/15.

- d. TRS Emissions. It is assumed that compliance with the TRS emissions limit is achieved by maintaining the minimum temperature of 1200°F and the 0.5-second residence time.
[Rule 62-296.404(3)(a)1. and Chapter 62-297, F.A.C., 40 CFR 60.283(a)(1)(iii)]

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

The following conditions apply to Emission Unit 037 (Thermal Oxidizer):

Operational Parameters

5. Permitted Capacity. The mill shall be operating at a rate of 118 TPH air dried unbleached pulp and delivering all of the NCGs and SOGs generated to the thermal oxidizer.

{Permitting note: The limitation has been placed in the permit for purposes of confirming that emissions testing is conducted within 90-100 percent of the mill's rated capacity and that the thermal oxidizer is receiving all of the NCGs and SOGs generated for destruction. Regular record keeping is required to account for all periods that NCGs and/or SOGs are being delivered to the thermal oxidizer. The owner or operator is expected to determine the mill's operating rate whenever emission testing is required.}
[Rules 62-4.070(3) and 62-297.310(2), F.A.C.]

6. Methods of Operation – (Fuels). This emissions unit is designed to incinerate NCGs and SOGs and to utilize their fuel value. Natural gas shall be the startup fuel and as a makeup fuel to maintain the minimum destruction temperature.
[Request by Applicant received June 21, 2000]

Emission Limits and Standards.

- 7.a. Visible Emissions shall not exceed 20% opacity. This visible emissions limit shall only be effective if the visible emission measurement can be made without being substantially affected by plume mixing or moisture condensation. [Rule 62-296.404(2)(b), F.A.C.]
- b. Total Reduced Sulfur (TRS) Emissions shall not exceed 5 ppm by volume on a dry basis at standard conditions corrected to 10 percent oxygen as a 12-hour average; and 0.20 lb/hr and 0.89 TPY.
[Rule 62-296.404(3)(f)1., F.A.C.]
- c. Sulfur Dioxide Emissions shall not exceed 31.3 lb/hr and 137.2 TPY (based on 60% Sulfur removal in the LVHC NCG streams in pre-scrubbers and 95% SO₂ control in wet scrubber).
[Request by Applicant received November 19, 2001]

Test Methods and Procedures

- 8.a. Visible Emissions. The test method for visible emissions shall be EPA Method 9, incorporated in Chapter 62-297, F.A.C. [Rule 62-297.401(9), F.A.C.]
- b. TRS Emissions. It is assumed that compliance with the TRS emissions limit is achieved by maintaining a minimum temperature of 1200°F and a 0.5 second residence time.
[Rule 62-296.404(3)(a)1., F.A.C.; 40 CFR 60.283(a)(1)(iii); 40 CFR 63.443(d)(3)]
- c. Sulfur Dioxide Emissions. The test method for Sulfur dioxide shall be EPA Method 6C, incorporated and adopted by reference in Chapter 62-297, F.A.C. [Rule 62-297.401(6)(c), F.A.C.]

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

9. Testing Frequency. The permittee shall conduct a formal compliance test for pollutants identified in Specific Condition No. 7.a.-c., within 60 days after the maximum production rate at which the condensate stripper will be operated has been achieved, but not later than 180 days after its initial startup. At least 15 days prior to the date on which each formal compliance test is to begin, the permittee shall notify the Department of the date, time, and place of each test, and the test contact person who will be responsible for coordinating and having the test conducted.
[Rules 62-297.310(7)(a)1 and 62-297.310(7)(a)9, F.A.C, Request by Applicant received June 21, 2000, 40 CFR 60.8(a)]

Monitoring Requirements

10. The Thermal Oxidizer shall be equipped with devices to continuously monitor temperature, at the point of combustion, and oxygen. The temperature device shall be certified by the manufacturer to be accurate within ± 1 percent of the temperature being measured. The oxygen monitors shall be certified by the manufacturer to be accurate to within 0.1 percent oxygen by volume.
[Rule 62-296.404(5)(c), F.A.C.; 40 CFR 60.284(b)(1)]
11. The permittee shall file a report with the Department on the results of each compliance test required by Specific Condition No. 9 as soon as practical but no later than 45 days after the last sampling run of each test that is completed.
[Rules 62- 297-310(8)(a) and (b), F.A.C]

Recordkeeping Requirements

12. The permittee shall maintain a complete file of any measurements, including continuous emission monitoring system, monitoring device, and performance testing measurements; any continuous emission monitoring system performance evaluations; any continuous emissions monitoring system or monitoring device calibration checks; any adjustments and maintenance performed on these systems or devices; and any other information required, recorded in a permanent legible form available for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports and records.
[Rule 62-296.404(6)(b), F.A.C.]

The following conditions apply to Emission Unit 037 (New Condensate Steam Stripper):

13. TRS Emissions. The gaseous emissions from this emissions unit shall be collected and incinerated in either the Thermal Oxidizer or the No. 4 Combination Boiler.

Note: The design of the Thermal Oxidizer and the nature of the No. 4 Combination Boiler are such that they meet the minimum temperature of 1200°F for at least 0.5 second.

[Rule 62-296.404(3)(a)1., F.A.C.; 40 CFR 60.280(a); 40 CFR 60.283(a)(1)(iii)]

14. The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart A – General Provisions.

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

The following conditions apply to Emission Units 016 and 037:

15. The ID Number and Project Name for this facility shall be used on all correspondences.
16. This permit shall supercede previous permits issued for the Thermal Oxidizer and the No. 4 Combination Boiler for the changes made and incorporating the Maximum Achievable Control Technology (MACT) regulations 40 CFR 63, Subpart S. This permit allows for the replacement of the existing TRS Incinerator and Condensate stripper with a Thermal Oxidizer and Condensate Steam Stripper, the installation of **two pre-scrubbers**, a new Foul Condensate Tank, a **candle mist eliminator filter**, and the use of No. 4 Combination Boiler as a secondary combustion device for NCGs and SOGs.
17. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart S no later than April 16, 2001, unless extended pursuant to 40 CFR Part 63, Subpart A. [40 CFR 63.440(d)]
18. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart A - General. [40 CFR 63.440(g)]
19. Hours of Operation. The hours of operation of these units are not restricted, i.e. 8,760 H/Y. [Permit No. AC54-266676/ PSD-FL-226; Permit No. AC54-163040; Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Subpart S, MACT I Requirements

20. Total HAP emissions from the following equipment systems shall be controlled as specified in Specific Condition No. 21:
LVHC system: the collection of equipment including the digester, turpentine recovery (condensers, decanters, turpentine storage tanks, and any liquid streams associated with the turpentine recovery process such as turpentine decanter underflow), evaporator, steam stripper systems, and any other equipment serving the same function as those previously listed. [40 CFR 63.443(a)]
21. Each equipment system listed in Specific Condition No. 20 shall be enclosed and vented into a closed-vent system and routed to the Thermal Oxidizer or the No. 4 Combination Boiler for total HAP emission reduction. The enclosures and closed-vent system shall meet the requirements specified in Specific Condition No. 28. The Thermal Oxidizer shall either 1) reduce total HAP emissions by 98 percent or more by weight; or 2) reduce the total HAP concentration at the outlet to 20 parts per million or less by volume, corrected to 10 percent oxygen on a dry basis. During periods when the No. 4 Combination Boiler is used to destroy NCGs / SOGs, the HAP emission stream shall be introduced with the primary fuel or into the flame zone. [40 CFR 63.443(c), 40 CFR 63.443(d)(1); 40 CFR 63.443(d)(2)]
22. Periods of excess emissions reported under Specific Condition No. 18 shall not be a violation of Specific Condition No. 21 provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed 1% for Thermal Oxidizer and the No. 4 Combination Boiler. [40 CFR 63.443(e)(1)]

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

Standards for pulping process condensates:

23. The pulping process condensates from the following equipment systems that in total contain a total HAP mass of 7.2 pounds or more of total HAP per ton of ODP for unbleached production and 11.1 pounds or more of total HAP per ton of ODP for bleached production shall be treated to meet the requirements specified in Specific Conditions Nos. 24(2)(i) and (2)(ii), and 25¹
- 1) Each digester system;
 - 2) Each turpentine recovery system;
 - 3) Each evaporator system condensate from:
 - (i) The vapors from each stage where weak liquor is introduced (feed stages); and
 - (ii) Each evaporator vacuum system for each stage where weak liquor is introduced (feed stages).
 - 4) Each HVLC collection system; and
 - 5) Each LVHC collection system.
- ¹ For purposes of meeting this requirement, the permittee may meet a prorated mass standard that is calculated by prorating the applicable mass standard for bleached and unbleached pulp products (11.1lb/Ton ODP and 7.2 lb/Ton ODP, respectively) by the ratio of annual tons of bleached and unbleached ODP. [40 CFR 63.446(b) – April 12, 1999 Amendment; 40 CFR 63.446(c)(3), 40 CFR 63.446(i)]
24. The pulping process condensates shall be conveyed in a closed collection system that is designed and operated to meet the requirements as specified below.
- (1) Each closed collection system shall meet the individual drain system requirements specified in 40 CFR 63.960, 63.691, and 63.692 of Subpart RR, except for closed vent systems and control devices shall be designed and operated in accordance with 40 CFR 63.443(d) and 63.450, instead of in accordance with 40 CFR 63.962(a)(3)(ii), (b)(3)(ii)(A) and (b)(3)(ii)(B)(5)(iii).
 - (2)(i) The fixed roof and all openings (access hatches, sampling ports, gauge wells) of the Foul Condensate Tank shall be designed and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million above background, and vented into a closed-vent system that meets the requirements in 40 CFR 63.450 and routed to the Thermal Oxidizer or the No. 4 Combination Boiler.
 - (2)(ii) Each opening shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that the Foul Condensate Tank contains pulping process condensates or any HAP removed from a pulping process condensate stream except when it is necessary to use the opening for sampling, removal, or for equipment inspection, maintenance, or repair.
[40 CFR 63.446(d) – April 12, 1999 Amendment]

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

25. Each pulping process condensate from the equipment systems listed in Specific Condition No. 23 shall be treated in the new condensate stripper according to one of the following options:
- (1) Recycle the pulping process condensate to an equipment system specified in §63.443(a) meeting the requirements specified in 40 CFR 63.443(c) and (d); or
 - (2) Discharge the pulping process condensate below the liquid surface of a biological treatment system meeting the requirement specified in Specific Condition No. 25(3); or
 - (3) Treat the pulping process condensates to reduce or destroy the total HAPs by at least 92 percent or more by weight; or
 - (4) At mills that do not perform bleaching, treat the pulping process condensates to remove 6.6 pounds or more of total HAP per ton of ODP, or achieve a total HAP concentration of 210 parts per million or less by weight at the outlet of the control device; or
 - (5) At mills that perform bleaching, treat the pulping process condensates to remove 10.2 pounds or more of total HAP per ton of ODP, or achieve a total HAP concentration of 330 parts per million or less by weight at the outlet of the control device.
- [40 CFR 63.446(e)]
26. Each HAP removed from a pulping process condensate stream during treatment and handling under Specific Condition Nos. 24 and 25, shall be controlled as specified in Specific Condition No. 21.
- [40 CFR 63.446(f)]

Applicable to Steam Stripper Only:

27. Periods of excess emissions reported under Specific Condition No. 18 shall not be a violation of Specific Condition Nos. 24, 25, and 26, provided that the time of excess emissions (including periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed 10% for the Steam Stripper. [40 CFR 63.446(g)]

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

Standards for enclosures and closed-vent systems:

28. Each enclosure and closed-vent system specified in Specific Condition No. 21 for capturing and transporting vent streams that contain HAP shall meet the following requirements.
- (a) Each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in Specific Condition No. 44. Each enclosure or hood opening closed during the initial performance test specified in 40 CFR 63.457(a) shall be maintained in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs.
 - (b) Each component of the closed-vent system used to comply with Specific Condition No. 20 that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in Specific Condition No. 43.
 - (c) Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §§63.443 shall comply with either of the following requirements:
 - (1) On each bypass line, the permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line once every 15 minutes. The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line; or
 - (2) For bypass line valves that are not computer controlled, the permittee shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal.
- [40 CFR 63.450 (a), (b), (c), and (d)- April 12, 1999 Amendment]

Monitoring Requirements

29. The permittee shall install, calibrate, certify, operate, and maintain according to the manufacturer's specifications, a continuous monitoring system (CMS) as specified in 40 CFR 63.453(a). The CMS shall include a continuous recorder. [40 CFR 63.453(a)]

Applicable to the Thermal Oxidizer:

30. A CMS shall be operated to measure the temperature in the firebox or in the ductwork immediately downstream of the firebox and before any substantial heat exchange occurs for each thermal oxidizer used to comply with the requirements of 40 CFR 63.443(d)(1) through (d)(3). Owners and operators complying with the HAP concentration requirements in 40 CFR 63.443(d)(2) may install a CMS to monitor the thermal oxidizer outlet total HAP or methanol concentration, as an alternative to monitoring thermal oxidizer operating temperature.
[40 CFR 63.453(b)]

Applicable to the Steam Stripper:

31. A CMS shall be operated to measure the following parameters:
 - (1) The process wastewater feed rate;
 - (2) The steam feed rate; and
 - (3) The process wastewater column feed temperature.[40 CFR 63.354(g)]

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

32. A CMS shall be operated to measure the appropriate parameters determined according to the procedures specified in Specific Condition No. 36 to comply with the condensate applicability requirements specified in 40 CFR 63.446(c). [40 CFR 63.453(i)]
33. Each enclosure and closed-vent system used to comply with Specific Condition No. 28 shall comply with the following requirements:
- (1) For each enclosure opening, a visual inspection of the closure mechanism specified in Specific Condition No. 28.(a) shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed.
 - (2) Each closed-vent system shall be visually inspected every 30 days and at other times as requested by the Administrator. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.
 - (3) For positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in Specific Condition No. 28.(b) measured initially and annually by the procedures in Specific Condition No. 43.
 - (4) Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in Specific Condition No. 44.
 - (5) The valve or closure mechanism specified in Specific Condition No. 28.(c)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.
 - (6) If an inspection required by Specific Conditions Nos. 33.(1) through 33.(5) identifies visible defects in ductwork, piping, enclosures or connections to covers required in Specific Condition No. 28, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable.
 - (i) A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified.
 - (ii) The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

[40 CFR 63.453(k); April 12, 1999 Amendment]

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

34. Each pulping process condensate closed collection system used to comply with Specific Condition No. 24 shall comply with the following:
- (1) Each pulping process condensate closed collection system shall be visually inspected every 30 days and shall comply with the inspection and monitoring requirements specified in 40 CFR 63.964 of Subpart RR, except:
 - (i) Owners or operators shall comply with the recordkeeping requirements of Section 63.454 instead of the requirements specified in 40 CFR 63.964(a)(1)(vi) and (b)(3) of Subpart RR.
 - (ii) Owners or operators shall comply with the inspection and monitoring requirements for closed-vent systems and control devices specified in Specific Condition Nos. 29 and 33 instead of the requirements specified in 40 CFR 63.964(a)(2) of Subpart RR.
 - (3) Each condensate tank used in the closed collection system shall be operated with no detectable leaks as specified in Specific Condition No. 24.(2)(i) measured initially and annually by the procedures specified in Specific Condition No. 43.
 - (4) If an inspection required by this section identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured, then corrective actions specified in 40 CFR 63.964(b) of Subpart RR shall be taken.
[40 CFR 63.453(1)]
35. Each owner or operator using a control device, technique or an alternative parameter other than those specified in Specific Condition Nos. 30, 31, 32 and 33, shall install a CMS and establish appropriate operating parameters to be monitored that demonstrate, to the Administrator's satisfaction, continuous compliance with the applicable control requirements. [40 CFR 63.453(m)]
36. To establish or reestablish, the value for each operating parameter required to be monitored under Specific Condition Nos. 30, 31, 32, 33, 34 and 35, or to establish appropriate parameters for Specific Condition Nos. 31 and 35, each owner or operator shall use the following procedures:
- (1) During the initial performance test required in 40 CFR 63.457(a) or any subsequent performance test, continuously record the operating parameter;
 - (2) Determinations shall be based on the control performance and parameter data monitored during the performance test, supplemented if necessary by engineering assessments and the manufacturer's recommendations;
 - (3) The owner or operator shall provide for the Administrator's approval the rationale for selecting the monitoring parameters necessary to comply with Specific Condition Nos. 31 and 35; and
 - (4) Provide for the Administrator's approval the rationale for the selected operating parameter value, and monitoring frequency, and averaging time. Include all data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the applicable emission standard.
[40 CFR 63.453(n)]
37. The permittee shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored and established under paragraphs (a) through (n) of 40 CFR 63.453. Except as provided in Specific Condition Nos. 22 and 27, operation of the control device below minimum operating parameter values or above maximum operating parameter values established under this subpart or failure to perform procedures required by this subpart shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions. [40 CFR 63.453(o)]

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.:1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

Recordkeeping Requirements

38. For each applicable enclosure opening, closed-vent system, and closed collection system, the permittee shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment and shall record the following information for each inspection:
- (1) Date of inspection;
 - (2) The equipment type and identification;
 - (3) Results of negative pressure tests for enclosures;
 - (4) Results of leak detection tests;
 - (5) The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection);
 - (6) The date the defect or leak was detected and the date of each attempt to repair the defect or leak;
 - (7) Repair methods applied in each attempt to repair the defect or leak;
 - (8) The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
 - (9) The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;
 - (10) The date of successful repair of the defect or leak;
 - (11) The position and duration of opening of bypass line valves and the condition of any valve seals; and
 - (12) The duration of the use of bypass valves on computer controlled valves.
- [40 CFR 63.454(b)]

Reporting Requirements

39. The Permittee shall submit on a 2-year basis from April 14, 1999, an updated non-binding control strategy report. The report shall contain, at a minimum, the information specified in 40 CFR 63.455(b), in addition to the information required in 40 CFR 63.9(b)(2) of 40 CFR Part 63, Subpart A. [40 CFR 63.455(b)]

Test methods and procedures

40. Initial performance test. An initial performance test is required for all emission sources subject to the limitations in 40 CFR 63.446. [40 CFR 63.457]
41. Liquid sampling locations and properties. For purposes of selecting liquid sampling locations and for determining properties of liquid streams such as wastewaters, process waters, and condensates required in 40 CFR 63.446, the permittee shall comply with the requirements of 40 CFR 63.457(c). [40 CFR 63.457(c)]
42. Liquid stream calculations. To demonstrate compliance with the mass flow rate, mass per megagram of ODP, and percent reduction requirements for liquid streams specified in §63.446, the permittee shall comply with the requirements of 40 CFR 63.457(j). [40 CFR 63.457(j)]
43. Detectable leak procedures. To measure detectable leaks for closed-vent systems as required in Specific Condition No. 30(b), the permittee shall comply with the requirements of 40 CFR 63.457(d). [40 CFR 63.457(d)]
44. Negative pressure procedures. To demonstrate negative pressure as required in Specific Condition No. 28(a) at process equipment enclosure openings, the permittee shall comply with the requirements of 40 CFR 63.457(e). [40 CFR 63.457(e)]

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

I.D. Number: 1070005
Revised Draft Permit No.: 1070005-017-AC
Date of Issue: April 5, 2002
Expiration Date: October 5, 2003
County: Putnam

SPECIFIC CONDITIONS:

45. Vent sampling port locations and gas stream properties. For purposes of selecting vent sampling port locations and determining vent gas stream properties, required in 40 CFR 63.443, the permittee shall comply with the applicable procedures specified in 40 CFR 63.457(b). [40 CFR 63.457(b)]
46. Vent gas stream calculations. To demonstrate compliance with the mass emission rate, mass emission rate per megagram of ODP, and percent reduction requirements for vent gas streams specified in 40 CFR 63.443, the permittee shall comply with requirements of 40 CFR 63.457(i). [40 CFR 63.457(i)]
47. HAP concentration measurements. For purposes of complying with the requirements in 40 CFR 63.443, the permittee shall comply with requirements of 40 CFR 63.457(f). [40 CFR 63.457(f)]
48. Condensate HAP concentration measurement. For purposes of complying with the condensate requirements in 40 CFR 63.446, the permittee shall measure the total HAP concentration as methanol. [40 CFR 63.457(g)].
49. Condensate segregation procedures. The permittee shall comply with the requirements of 40 CFR 63.57(m). [40 CFR 63.457(m)].
50. Georgia Pacific will take measures to ensure that all property boundaries are properly fenced or have other physical barriers (equivalent to a fence), and/or are properly posted and routinely patrolled. [Rules 62-4.070(3) and 62-212.400(5), F.A.C.]
51. During the period of time when the changes described under Project Nos. 016 and 017 are being implemented, and the thermal oxidizer is being re-started, the LVHC NCGs and SOGs are to be routed to the No. 4 Combination Boiler (the secondary control device for MACT I). This may occur for a period not to exceed one year from the time of issuance of this construction permit. Should Georgia Pacific experience problems with the No. 4 Combination Boiler during this period, the facility shall shut down the process sources that generate the LVHC NCGs and SOGs in order to maintain compliance with the MACT I rule and TRS regulations. [PCP Exclusion dated March 14, 2002]
52. The sulfur content of the No. 6 fuel oil used by the facility for all of the fuel sources shall not exceed 2.35% wt. This condition shall supercede any condition concerning the sulfur content of No. 6 fuel oil issued in previous air permits for all the fuel sources at the facility, including the No. 4 Power Boiler, No. 5 Power Boiler, No. 4 Combination Boiler and the No. 4 Lime Kiln. [PCP Exclusion dated March 14, 2002]

