

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

April 11, 1989

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

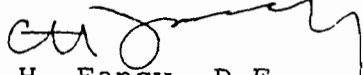
Mr. James D. Phillips
Director, Engineering Development
NASA
John F. Kennedy Space Center
Kennedy Space Center, Florida 32899

Dear Mr. Phillips:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for NASA to construct/install a new Binks dry type paint spray booth and Dayton grit blast unit, each with associated control systems, in Hangar N to refurbish ground support equipment at the Cape Canaveral AF Station located in Brevard County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,


C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/ks

Attachments

cc: C. Collins, CF District
M. Busacca, KSC

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

NASA
John F. Kennedy Space Center
Kennedy Space Center, FL 32899

DER File No. AC 05-158235

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, NASA, applied on December 5, 1988, to the Department of Environmental Regulation for a permit to construct/install a new Binks dry type paint spray booth and Dayton grit blast unit, each with associated control systems, in Hangar N to refurbish ground support equipment at the Cape Canaveral AF Station located in Brevard County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

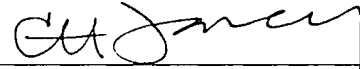
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applicant have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such

person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:

J. D. Phillips, KSC
C. Collins, CF District
M. Busacca, KSC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on April 11, 1989.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Rocky Carter
Clerk

4-11-89
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to NASA, John F. Kennedy Space Center, Kennedy Space Center, Florida 32899, to construct/install a new Binks dry type paint spray booth and Dayton grit blast unit, each with associated control systems, in Hangar N to refurbish ground support equipment at the Cape Canaveral AF Station located in Brevard County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
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If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the

To Bruce
Date 6/8 Time 3:28

WHILE YOU WERE OUT

M. Mario
of Kennedy

Phone 5750 52
Area Code 54 Number 52 Extension

| | |
|--|---|
| <input checked="" type="checkbox"/> TELEPHONED | <input checked="" type="checkbox"/> PLEASE CALL |
| <input type="checkbox"/> CALLED TO SEE YOU | <input type="checkbox"/> WILL CALL AGAIN |
| <input type="checkbox"/> WANTS TO SEE YOU | <input type="checkbox"/> URGENT |
| <input type="checkbox"/> RETURNED YOUR CALL | |

Message Letter has
come in

MS
Operator

Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation
Central Florida District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

National Aeronautics and Space Administration
Cape Canaveral Air Force Station
Kennedy Space Center, Florida
Brevard County

State Construction Permit Number:
AC 05-158235

Florida Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Quality Management
Central Air Permitting

April 11, 1989

I. Application

A. Applicant

NASA
John F. Kennedy Space Center
Cape Canaveral AF Station
Kennedy Space Center, FL 32899

B. Project and Location

The applicant proposes to construct/install a new Binks dry type paint spray booth and a Dayton grit blast unit, each with associated control systems, in Hangar N to refurbish ground support equipment at the Cape Canaveral AF Station located in Brevard County, Florida.

The UTM coordinates are Zone 17, 540.3 km East and 3151.0 km North.

C. Process and Controls

The two processes involved are the solid film lubricant (Lube-Lok) application process and the ground support equipment (GSE) maintenance process.

The solid film lubricant process involves various component cleaning processes using volatile organic compound/organic solvents, grit, and alkaline material. Solvent cleaning of the components is performed under a local ventilation system in Room 105. After cleaning, the components are coated and oven-cured. Coating of components are performed in a paint booth, which contains paint filters for controlling particulate matter (PM) emissions and visible emissions (VE). The curing ovens are totally enclosed and are without vents. Solvent clean-up of the spray equipment will occur within the paint booth.

The GSE maintenance process consists of priming and painting fifty (50) units of GSE on an annual basis. All priming and painting will be performed inside a ventilated paint booth, which is the same paint booth that will be used for applying coats of Lube-Lok in the solid film lubricant process.

Hazardous wastes generated from both processes will be collected in 55 gallon drums and will be segregated based on chemical compatibility. Quantification will be required as part of a material balance scheme to determine compliance with volatile organic compounds organic solvents (VOC/OS) allowable emissions.

The Standard Classification Codes are:

1. Paint Booth

- o 4-90-002-99 waste solvent recovery
(tons reclaimed solvent)
- o 4-02-999-98 organic solvent evaporation surface
coating (gallons)
- o 4-02-025-99 surface coating of miscellaneous metal
parts (tons solvent in coating)
- o 4-02-001-10 paint: solvent base (gallons of coating)
- o 4-02-006-10 primer (gallons of coating)

2. Grit Blast Unit

- o 3-09-002-01 aluminum oxide abrasive
(tons abrasive consumed)

II. Rule Applicability

The proposed project is subject to preconstruction review in accordance with Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4.

The application package was deemed complete on March 13, 1989.

The existing facility is located in an area designated attainment for all of the criteria pollutants.

The following table will exhibit the potential pollutant emissions in tons per year (TPY) projected for the proposed project:

Table 1

| Source | Projected Potential Pollutant Emissions (TPY) | |
|------------------------|---|-------|
| | VOC | PM |
| Paint Spray Booth | 1.8 | 0.034 |
| Fugitive from Hanger N | 2.0 | 0.03 |
| Grit Blast Booth | | 0.001 |
| Total | 3.8 | 0.065 |

Note: Pollutant emissions are based on refurbishment of 48 solid rocket booster units (24 flights with two per flight used) per year.

Since the total permitted VOC/OS emissions from the solid rocket booster facility (SRBF) and Kennedy Space Center (KSC) are 125 TPY, the proposal will be a minor modification to a major facility. Since the facility is not listed in Table 500-1, F.A.C. Chapter 17-2, the threshold for triggering new source review is 250 TPY. Therefore, the proposed VOC/OS potential emissions will be subject to review in accordance with F.A.C. Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Requirements.

The VOC/OS emissions from the SRBF refurbishing operations will be permitted in accordance with F.A.C. Rule 17-2.620(1) and (2). Pursuant to F.A.C. Rule 17-2.620(1), the VOC/OS emissions from the solid film lubricant process and ground support equipment maintenance process, which includes the paint spray booth operations, will be accounted for using a material balance scheme and includes the following:

- a) Beginning/initial inventory of all VOC/OS;
- b) Plus, all deliveries of VOC/OS after the initial inventory;
- c) Minus, all quantified VOC/OS material recycled and/or sent off premise as waste/hazardous waste;
- d) Minus a final inventory, which should occur 12 calendar months after the initial inventory; and,
- e) Emissions must be verifiable on a monthly basis.

Note: It will be assumed that the net difference is the annual amount of VOC/OS emissions being released into the atmosphere.

The results of the material balance scheme shall be submitted on the Annual Operating Form, DER Form 17-1.202(6). The report is to be submitted to the DER's Central Florida District office.

Pursuant to F.A.C. Rule 17-2.620(2), objectionable odors shall not be allowed off plant property.

PM emissions from the paint spray booth operations will be minimized using filters with an estimated efficiency of 95%. Because the potential PM emissions are considered negligible, the Department will impose a visible emission standard of 5% opacity (no visible emissions), not to be exceeded, as reasonable assurance that the filtration system is operating properly pursuant to F.A.C. Rule 17-4.040(1)(b). Initial and annual compliance tests using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(6)(b)9. and 40 CFR 60, Appendix A, shall be required.

Since the potential PM emissions from the grit blast unit operations are considered negligible and do not vent into the atmosphere, the Department does not feel justified to impose any emission limiting standards at this time pursuant to F.A.C. Rule 17-4.040, Exemptions. The grit blast unit will be using an associated PM control system that will employ ULPA filters having a PM collection/retention efficiency of 99.9995% at 0.12 microns.

The proposed operations are subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operations-Problems.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

Limitations for PM, VOC/OS, and VE are applicable to various sources/operations at the facility and follows:

Table 2

| Source | | Emission Limitations |
|-------------------|--------|---|
| Paint Spray Booth | VE | not greater than 5% opacity |
| | VOC/OS | material balance scheme (included under Hanger N) |
| Hangar N | VOC/OS | material balance scheme: 633 lbs/mth and 3.8 TPY |

The grit blast unit operations will be exempted from emission limitations due to its projected potential pollutant emissions and assumed negligible impact on the environment. Any change in the proposed operations of this unit will require notification to the Department.

B. Air Quality Analysis

From a review of the application package, an air quality analysis was not required.

IV. Conclusion

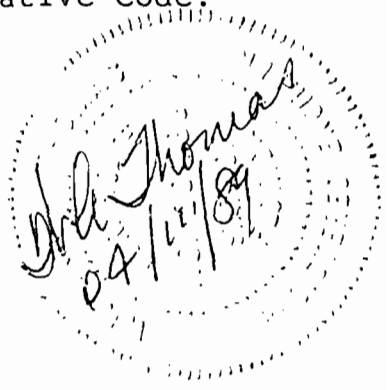
The use of ULPA filters to control both PM and visible emissions from the grit blast unit operations is such that the Department will not impose any emission limitations at this time. Proper operation of this unit will maintain the exemption status.

The use and proper maintenance of the proposed filters associated with the paint spray booth operations should provide excellent PM and visible emissions control. Since the potential PM emissions are considered negligible, the Department will impose a VE standard as a means of assuring proper operation and maintenance of the paint spray booth operations. Continual violations will require Departmental review of the exemption and the potential imposition of a PM mass emission limiting standard and EPA Reference Method 5 compliance tests.

Unconfined and fugitive PM and VOC/OS emissions from Hangar N should be minimal and not cause an impact on the environment.

The employment of a material balance scheme, verifiable on a monthly basis, is an acceptable means to assess the VOC/OS annual emissions from Hangar N.

Based on the information provided by NASA, the Department has reasonable assurance that the proposed construction/installation of a new paint spray booth and grit blasting unit, as described in this evaluation and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.



A circular stamp with a dotted border. Inside the stamp, the name "John Thomas" is handwritten in cursive. Below the name, the date "04/11/89" is handwritten.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMIT

Mr. James D. Phillips
Director, Engineering Development
NASA
John F. Kennedy Space Center
Kennedy Space Center, Florida 32899

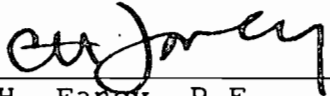
October 4, 1989

Enclosed is construction permit No. AC 05-158235 for the installation of a new Binks dry type paint spray booth and a Dayton grit blast unit in Hangar N at the Cape Canaveral AF Station in Brevard County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Bureau of Air Regulation

Copy furnished to:

C. Collins, Central District
M. Busacca, KSC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 10-5-89.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Kim Jober
Clerk

10-5-89
Date

Final Determination

National Aeronautics and Space Administration
Cape Canaveral Air Force Station
Kennedy Space Center, Florida
Brevard County

Construction Permit Number:
AC 05-158235

Florida Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

September 28, 1989

Final Determination

The construction permit application has been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in the Florida Today on August 4, 1989. The Technical Evaluation and Preliminary Determination were available for public inspection at the DER's Central District office and Bureau of Air Regulation office.

There were no comments received on the proposed action. Therefore, it is recommended that the proposed construction permit be issued as drafted.

CAPE PUBLICATIONS, INC.

The Times

Published Weekly on Wednesday

THE TRIBUNE

Published Weekly on Wednesday

RECEIVED

SEP 25 1989



Published Daily

STATE OF FLORIDA
COUNTY OF BREVARD

Before the undersigned authority personally appeared Linda L. Spicer who on oath says that he/she is Legal Advertising Clerk of the FLORIDA TODAY, a newspaper published in Brevard County, Florida; that the attached copy of advertising being a Legal Notice

_____ in the matter of _____
Order No. CC-55382B; permit to NASA

_____ in the _____ Court

was published in the FLORIDA TODAY NEWSPAPER
in the issues of August 4, 1989

Affiant further says that the said FLORIDA TODAY NEWSPAPER is a newspaper published in said Brevard County, Florida and that the said newspaper has heretofore been continuously published in said Brevard County, Florida regularly as stated above, and has been entered as second class mail matter at the post office in COCOA, said Brevard County, Florida for a period of one year next preceeding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebato, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Linda L. Spicer

Sworn and subscribed to before me this

4th day of August A.D. 19 89

Co. Th... / ...

Notary Public
State of Florida
My Commission Expires 12/31/93

State of Florida
Department of
Environmental Regulation
Notice of Intent to Issue
- The Department of Environ-
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notice of its intent to issue a per-
mit to NASA, John F. Kennedy
Space Center, Kennedy Space
Center, Florida 32899, to con-
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Type paint spray booth and Day-
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sociated control systems, in Han-
dman to refurbish ground support
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AF Station in Brevard County,
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terests are affected by the De-
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set forth below and must be filed
with the Office of General
Counsel of the Department at
2600 Blair Stone Road, Tallahas-
see, Florida 32399-2400, within
fourteen (14) days of publication
of this notice. Petitioner shall
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- Failure to file a petition within
this time period shall constitute a
waiver of any right such person
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under Section 120.57, Florida
Statutes.
- The Petition shall contain the
following information:
- (a) The name, address, and
telephone number of each peti-
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Department of Environmental
Regulation
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Dept. of Environmental
Regulation
3319 Maguire Blvd., Suite 222
Orlando, Florida 32803-3767
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to Mr. Bill Thomas at the Depart-
ment's Tallahassee address. All
comments mailed within 14 days
of the publication of this notice
will be considered in the Depart-
ment's final determination.
Th99/142-11-874, 1989, Friday

Permitted to issue this permit



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

National Aeronautics and
Space Administration
John F. Kennedy Space Center
Kennedy Space Center, FL
32899

Permit Number: AC 05-158235
Expiration Date: Dec. 31, 1990
County: Brevard
Latitude/Longitude: 28°19'16"N
80°35'18"W
Project: Paint Spray Booth and
Grit Blast Unit

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. 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:

For the construction/installation of a Binks dry type paint spray booth and a Dayton grit blast unit, each with associated control systems, in Hangar N at the Cape Canaveral AF Station to refurbish ground support equipment. The UTM coordinates are Zone 17, 540.3 km East and 3151.0 km North.

The Standard Classification Codes are:

1. Paint Spray Booth
 - o 4-90-002-99 waste solvent recovery (tons reclaimed solvent)
 - o 4-02-001-10 paint: solvent base (gallons of coating)
 - o 4-02-006-10 primer (gallons of coating)
 - o 4-02-025-99 surface coating miscellaneous metal parts (tons of solvent in coating)
 - o 4-02-999-98 organic solvent evaporation surface coating (gallons)
2. Grit Blast Unit
 - o 3-09-002-01 aluminum oxide abrasive (tons abrasive consumed)

The source shall be in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16), received December 5, 1988.
2. Mr. C. H. Fancy's letter dated January 3, 1989.
3. Mr. James D. Phillip's letter with enclosure received March 13, 1989.
4. Technical Evaluation and Preliminary Determination dated April 11, 1989.

PERMITTEE:
NASA

Permit No. AC 05-158235
Expiration Date: Dec. 31, 1990

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
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. Nor 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 does not constitute 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 no title to land or water, does not constitute state recognition or acknowledgement 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
NASA

Permit No. AC 05-158235
Expiration Date: Dec. 31, 1990

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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.

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 notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact 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.

PERMITTEE:
NASA

Permit No. AC 05-158235
Expiration Date: Dec. 31, 1990

GENERAL CONDITIONS:

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.
- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

PERMITTEE:
NASA

Permit No. AC 05-158235
Expiration Date: Dec. 31, 1990

GENERAL CONDITIONS:

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 measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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 submitted or corrected promptly.

SPECIFIC CONDITIONS:

A. Hangar N

1. Permitted hours of operation are 16 hrs/day, 5 days/wk, and 52 wks/year.

2. Waste paints, thinners, solvents, and solid film lubricant chemicals shall be collected, properly sealed/covered, quantified, and transported to a federally permitted hazardous waste receiving facility.

3. Objectionable odors shall not be allowed off plant property.

4. A material balance scheme shall be employed to assess the annual emissions of volatile organic compounds/organic solvents (VOC/OS) from Hangar N operations and include the following:

- a. Initial inventory of all VOC/OS;
- b. Deliveries of all VOC/OS material after the initial inventory;
- c. Collected and shipped-out waste VOC/OS after the initial inventory;
- d. Ending inventory of all VOC/OS (12 calendar months after the initial inventory); and,
- e. Emissions must be verifiable on a monthly basis.

Note: It will be assumed that any VOC/OS used and not accounted for by the collection and shipping-out of waste VOC/OS were emitted into the atmosphere.

PERMITTEE:
NASA

Permit No. AC 05-158235
Expiration Date: Dec. 31, 1990

SPECIFIC CONDITIONS:

5. Maximum VOC/OS emissions shall not exceed 633 lbs/mth and 3.8 TPY.

6. The operations are subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operations-Problems.

7. Reasonable precautions shall be used to minimize fugitive and unconfined emissions of particulate matter (PM) and VOC/OS. Reasonable precautions include the use of tightly fitting lids/covers on all VOC/OS containers, storage of clean-up materials (rags, mops, etc.) in covered containers, minimizing air drafts across open containers of VOC/OS, and the immediate removal of any dust piles associated with operations.

8. The annual operating report (DER Form 17-1.202(6)) shall contain the quantified emissions of VOC/OS from all operations and is to be based on the material balance scheme.

9. Projected potential fugitive pollutant emissions for PSD tracking are:

- o VOC/OS: 2.0 TPY
- o PM: 0.03 TPY

B. Paint Spray Booth

1. Filters controlling PM emissions and VE shall be used and properly maintained.

2. Visible emissions (VE) shall not exceed 5% opacity (no VE).

3. Initial and annual VE compliance tests shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(6)(b)9. and 40 CFR 60, Appendix A.

4. Projected potential pollutant emissions for PSD tracking are: o PM: 0.03 TPY

5. A PM mass emission limiting standard and mass compliance test was not imposed by the Department at this time pursuant to F.A.C. Rule 17-4.040(1)(b). A violation of the VE standard will initiate review by the Department and the imposition of a PM mass emissions limiting standard and compliance tests using EPA Reference Method 5 in accordance with F.A.C Rule 17-2.700 and 40 CFR 60, Appendix A.

6. A manometer shall be installed and the pressure drop established to assure proper filter maintenance and PM collection/control.

PERMITTEE:
NASA

Permit No. AC 05-158235
Expiration Date: Dec. 31, 1990

SPECIFIC CONDITIONS:

7. VOC/OS emissions shall be included in the material balance scheme required for Hangar N under Section A, No. 4, of the Specific Conditions.

C. Grit Blast Unit

1. At this time, there will not be any VE or PM mass emission limiting standards imposed pursuant to F.A.C. Rule 17-4.040(1)(b), Exemptions. With probable cause (excessive visible emissions), the Department shall reevaluate this exemption.

2. The integrity of the ULPA filters shall be properly maintained. The Department shall be notified if a change in filter type is being considered.

3. Projected potential pollutant emissions for PSD tracking are: o PM: 0.001 TPY

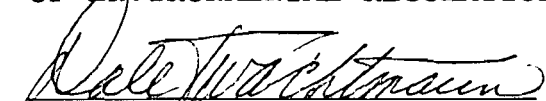
D. General

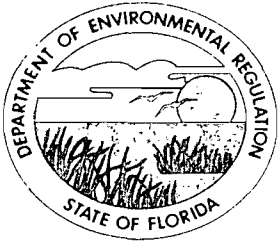
1. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

2. An application for an operation permit must be submitted to the DER's Central District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this 2 day
of October, 1989

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtman, Secretary



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

October 26, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. J. L. Sipple, Plant Manager
Procter & Gamble Cellulose
Route 3, Box 260
Perry, Florida 32347

Dear Mr. Sipple:

Re: Amendment Request to Construction Permits
Nos. AC 62-141916: No. 1 Batch Digester System;
AC 62-141917: No. 2 Batch Digester System;
AC 62-141918-21: Nos. 1-4 Multiple Effect Evaporator
Systems; AC 62-141927: No. 1 Bark Boiler

The Department received Mr. Ray Andreu's letter regarding the above referenced construction permits, which requested a month extension for both the "date to provide proof of final compliance" and the "permit expiration date." The Bureau finds the requests acceptable and the following will be changed and added:

I. Expiration Date (all permits)

From: September 24, 1989
To: October 24, 1989

II. Specific Conditions

A. AC 62-141916 and -141917

No. 10

From: Pursuant to FAC Rule 17-2.960(1), the batch digester system shall be in final compliance by May 12, 1989, and the permittee shall provide proof of final compliance to the DER's Northeast District office by June 26, 1989.

To: Pursuant to F.A.C. Rule 17-2.960(1), the batch digester system shall be in final compliance by May 12, 1989, and the permittee shall provide proof of

Mr. J. L. Sipple
Page Two
October 26, 1988

final compliance to the DER's Northeast District office by July 26, 1989.

B. AC 62-141918, -141919, -141920 and -141921

No. 8:

From: Pursuant to FAC Rule 17-2.960(1), the MEE System shall be in final compliance by May 12, 1989, and the permittee shall provide proof of final compliance to the DER's Northeast District office by June 26, 1989.

To: Pursuant to F.A.C. Rule 17-2.960(1), the MEE System shall be in final compliance by May 12, 1989, and the permittee shall provide proof of final compliance to the DER's Northeast District office by July 26, 1989.

C. AC 62-141927

No. 11:

From: Pursuant to FAC Rule 17-2.960(1), the Nos. 1, 2, 3, and 4 MEE Systems and Nos. 1 and 2 Batch Digesting Systems shall be in final compliance by May 12, 1989, and the permittee shall provide proof of final compliance to the DER's Northeast District office by June 26, 1989.

To: Pursuant to F.A.C. Rule 17-2.960(1), the Nos. 1, 2, 3, and 4 MEE Systems and Nos. 1 and 2 Batch Digesting Systems shall be in final compliance by May 12, 1989, and the permittee shall provide proof of final compliance to the DER's Northeast District office by July 26, 1989.

III. Attachments to be Incorporated:

A. AC 62-141916, -141917, -141918, -141919, -141920 and -141921

10. Mr. Ray Andreu's letter dated October 7, 1988, and received October 10, 1988..


Mr. J. L. Sipple
Page Three
October 26, 1988

B. AC 62-141927

12. Mr. Ray Andreu's letter dated October 7, 1988, and received October 10, 1988.

This letter must be attached to the referenced construction permits and the appropriate sections shall become a part of the permits.

Sincerely,



Dale Twachtmann
Secretary

DT/ks

Attachments

cc: B. Stewart, NE District
R. Andreu, PGC
B. Hewitt, Esq., DER



PROCTER & GAMBLE
CELLULOSE

THE PROCTER & GAMBLE CELLULOSE COMPANY
P.O. BOX 100
SPRINGFIELD, MISSOURI 65701
PHONE 417-875-1000

October 7, 1988

Mr. Bruce Mitchell
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

RECEIVED

OCT 10 1988

DER-BAQM

Re: TRS Construction Permits

Dear Mr. Mitchell:

As we recently discussed, the 1989 annual plant maintenance shutdown has been scheduled beginning on May 8, 1989. Plant start-up from the outage is currently scheduled for May 18, 1989. As we reviewed with you, this timing presents a conflict with the compliance verification deadline that was specified in the TRS construction permits for the following sources:

- No. 1 Batch Digester System (AC 62-141916)
- No. 2 Batch Digester System (AC 62-141917)
- No. 1 Multiple Effect Evaporator System (AC 62-141918)
- No. 2 Multiple Effect Evaporator System (AC 62-141919)
- No. 3 Multiple Effect Evaporator System (AC 62-141920)
- No. 4 Multiple Effect Evaporator System (AC 62-141921)
- No. 1 Bark Boiler (AC 62-141927)

The basic problem involves our inability to reliably sustain the permitted rates for the above referenced sources, which is a requirement of the compliance verification process, immediately following the plant start-up. In fact, historically, it has taken as long as three weeks to regain plant stability.

As a result, we are requesting a change to the compliance verification date included in the above referenced permits. The date should be changed from June 26, 1989, to July 26, 1989. Unfortunately, this change will also necessitate a change in the construction permit expiration date from September 24, 1989, to October 26, 1989, due to the 90-day operation permit applying filing requirement.

Thank you for your consideration of this matter. If we can provide any additional information, please call me at (904) 584-0347.

Very truly yours,

THE PROCTER & GAMBLE CELLULOSE COMPANY

Ray Andreu
Environmental Control Manager

*copied: Bruce Mitchell
Bill Stewart, DE Dist.
CHF/BT*

RA:msw
TRSPerm



PROCTER & GAMBLE
CELLULOSE

10/7/88
10/7/88

THE PROCTER & GAMBLE CELLULOSE COMPANY
RT 3 BOX 260
PERRY FLORIDA 32347-9011
PHONE (904) 584-0127

October 7, 1988

Mr. Bruce Mitchell
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

RECEIVED

OCT 10 1988

DER-BAQM

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As a result, we are requesting a change to the compliance verification date included in the above referenced permits. The date should be changed from June 26, 1989, to July 26, 1989. Unfortunately, this change will also necessitate a change in the construction permit expiration date from September 24, 1989, to October 26, 1989, due to the 90-day operation permit applicating filing requirement.

Can we change from September 24 to July 26?

Thank you for your consideration of this matter. If we can provide any additional information, please call me at (904) 584-0347.

Very truly yours,

THE PROCTER & GAMBLE CELLULOSE COMPANY

Ray Andreu
Environmental Control Manager

copied: Bruce Mitchell
Bill Stewart, DE Dist
CHF/BT

RA:msw
TRSPerm

10-11

~~CAF~~ FYI
BT

PA

10-11
BT



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. C. S. Aiken, Plant Manager
The Procter & Gamble Cellulose Company
Route 3, Box 260
Perry, Florida 32347

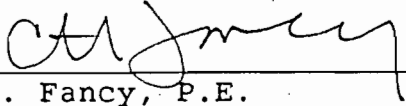
June 6, 1990

Enclosed is construction permit No. AC 62-172092 for The Procter & Gamble Cellulose Company to modify the existing No. 2 Bleach Plant located at their mill in Perry, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copy furnished to:

A. Kutyna, NE District
R. Andreu, P & GCC
A. Kinghorn, P.E., SEC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of buisness on 6-7-90.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged,

Kenn Jaker
Clerk

6-6-90
Date

Final Determination

The Procter & Gamble Cellulose Company
Taylor County
Perry, Florida

Construction Permit Number
AC 62-172092

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

June 1, 1990

Final Determination

The construction permit application has been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Perry News-Herald on April 27, 1990. The Technical Evaluation and Preliminary Determination (TE & PD) were available for public inspection at the DER's Northeast District and Bureau of Air Regulation (Bureau) offices.

Comments were received on the proposed action from Mr. Ray Andreu, with The Procter & Gamble Cellulose Company, in a letter received May 17, 1990. The comments addressed a couple of issues in the TE & PD. The Bureau's response to the comments are as follows and will be numbered the same as the comments are in the letter:

- TE & PD

Response 1. When a reference is made to a general rule/regulation (i.e., Chapter 17-2, 40 CFR, etc.), it is assumed that only the "applicable sections of" the rule/regulation affects a source. Therefore, the Bureau acknowledges the comment, but will not reissue the TE & PD because the request would not affect the intent significantly and the fact that the above referenced phrase is contained, as requested, verbatim in a Specific Condition of the draft construction permit. Consequently, no change will be made.

Response 2. The Bureau acknowledges the comment, but will not reissue the TE & PD since a source's/project's description refinement will not affect the intent significantly and the fact that the draft construction permit cover page and the permit's attachments, of which Mr. Andreu's letter will become one, do provide detailed descriptions of the project/source. Consequently, no change will be made.

- Attachment to be Incorporated

8. Mr. Ray Andreu's letter received May 17, 1990.

Therefore, it is recommended that the proposed permit be issued as drafted, with the above attachment incorporated.



PROCTER & GAMBLE
CELLULOSE

BEST AVAILABLE COPY

RECEIVED

MAY 04 1990
THE PROCTER & GAMBLE CELLULOSE COMPANY

DER-BAQM

May 3, 1990

Mr. Clair H. Fancy
Deputy Chief BAQM
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

This is to provide the required notice, pursuant to Section 403.815, FS & DER Rule 17-103.150, FAC, that The Procter & Gamble Cellulose Company has published the Notice of Proposed Agency Action on permit application AC62-172092. The proof of publication is enclosed.

Very truly yours,

THE PROCTER & GAMBLE CELLULOSE COMPANY

R. Andreu
Environmental Control Manager

RA:msw
Notice
Enclosure

*cc sent with
A. H. ...*

BEST AVAILABLE COPY

THE PERRY NEWS-HERALD
Published Weekly in City of Perry
County of Taylor
State of Florida

STATE OF FLORIDA,
COUNTY OF TAYLOR

AFFIDAVIT OF PUBLICATION

Before me, the undersigned authority, personally appeared DONALD D. LINCOLN, who on oath says that he is the PUBLISHER of the Perry News-Herald, weekly newspaper published in Perry, Taylor County, Florida, that the attached copy of advertisement being a notice to appear in re:

INTENT TO ISSUE PERMIT

was published in said newspaper in the issues of:

April 27, 1990

Affiant says further that the said Perry News-Herald is a newspaper published at Perry in said Taylor County, Florida, and that the said newspaper has heretofore been continuously published in said Taylor County, Florida, each week; has been entered as second class mail matter at the Post Office in Perry, Florida, in said Taylor County, Florida for a period of one year next preceding the first publication of the attached copy of notice to appear; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Donald D. Lincoln
Donald D. Lincoln, Publisher

Sworn to and subscribed before me this 30th day of May, 1990

Arthur J. Galt
Notary Public

NOTED THROUGH THE TRAVELERS

DEPARTMENT OF ENVIRONMENTAL
REGULATION
NOTICE OF INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to The Procter and Gamble Cellulose Company, P. O. Box 705, Perry, Florida 32347 for the modification of the existing No. 2 Bleach Plant located at the permittee's existing mill in Perry, Taylor County, Florida. The modification will allow the No. 2 Bleach Plant to operate a bleaching sequence of DEDED (D: chlorine dioxide; E: caustic extraction) and to maintain the capability to operate the existing bleaching sequence of CEHDED (C: chlorination; H: sodium hypochlorite). A determination of Best Available Control Technology (BACT) was not required. The Department is stating the intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within the time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes. The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts asserted by petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the action taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of the notice in the Office of General Counsel of the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to the proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C. The application is available for public inspection during business hours, 8 a.m. to 5 p.m. Monday through Friday, except legal holidays at the Department of Environmental Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, Department of Environmental Regulation, Northeast District, 3426 Bliss Road, Jacksonville, Florida 32207.

Any person may send written comments on the proposed action to Mr. Bill Thomas of the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Attachment 8



**PROCTER & GAMBLE
CELLULOSE**

BEST AVAILABLE COPY

May 14, 1990

THE PROCTER & GAMBLE CELLULOSE COMPANY
P.O. BOX 260
PERRY FLORIDA 32347-9512
PHONE: (904) 584-0123

Mr. William A. Thomas, P.E.
Permitting and Standards Section
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
MAY 17 1990

Re: The Procter & Gamble Cellulose Company
Proposed Construction Permit for #2 Bleach ~~PLD&R~~ and R-8
Chlorine Dioxide Generation Process (Permit No. AC621077092)

Dear Mr. Thomas:

The proposed permit referenced above was received on April 17, 1990 and the required one-time publication of the Notice of Intent to Issue Permit was initiated on April 27, 1990. The proof of publication has been submitted to the Bureau of Air Quality Management.

In the interest of technical accuracy, however, there are a couple of remaining discrepancies. As such, we are providing the following comments, which we would like the Department to consider in the final issuance of this permit:

- 1) Technical Evaluation and Preliminary Determination (Section II - Rule Applicability; Paragraph 1 and Throughout)

We believe that all references to 40 CFR that are not identified by applicable section(s) are too broad and may lead to future confusion. As such, we would recommend the addition of the words "applicable sections of" prior to all references to 40 CFR, which are not already specified by section.

- 2) Technical Evaluation and Preliminary Determination (Section III.A. - Emission Limitations; Paragraph 1)

Paragraph 1 does not accurately reflect the sources involved. As such, we would recommend that paragraph 1 be reworded as follows:

The pollutants to be regulated from the R-8 chlorine dioxide generation process and the No. 2 Bleach Plant and associated waste streams are....

If you have any questions regarding the comments above, please call me at (904) 584-0347. Thank you for your guidance and support on this important project.

Very truly yours,

THE PROCTER & GAMBLE CELLULOSE COMPANY

R. Andreu
Environmental Control Manager

RA:msw
SpeCond

cc: *B. Mitchell*
B. Williams



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
The Procter & Gamble Cellulose
Company
Route 3, Box 260
Perry, Florida 32347

Permit Number: AC 62-172092
Expiration Date: Dec. 31, 1992
County: Taylor
Latitude/Longitude: 30°03'59"N
83°33'12"W
Project: No. 2 Bleach Plant and
R-8 Chlorine Dioxide Generator

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July 1, 1988 version). 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:

For the modification of the No. 2 Bleach Plant located at the permittee's existing mill in Perry, Taylor County, Florida. The modification will allow the No. 2 Bleach Plant to operate a bleaching sequence of DEDED (D: chlorine dioxide; E: caustic extraction) and to maintain the capability to operate the existing bleaching sequence of CEHDED (C: chlorination; H: sodium hypochlorite); replace the existing R-2 chlorine dioxide generation process with a R-8 chlorine dioxide generation process; replace or upgrade various control systems; install a methanol storage tank, a sodium chlorate storage tank, a sodium chlorate mixing tank, and two chlorine dioxide storage tanks; replace the existing chlorination towers with a new D stage upflow/downflow tower; install a new water chiller; and, replace the existing two sulfuric acid storage tanks with a new one.

The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

The Source Industrial Codes are: 2611-Pulp Mills.

The Source Classification Codes are:

| | | |
|---------------|---|---------------------------------------|
| o 4-07-008-15 | Methanol storage tank-breathing loss | 10 ³ gals storage capacity |
| o 4-07-008-16 | Methanol storage tank-working loss | 10 ³ gals used per year |
| o 3-07-001-99 | Chlorine dioxide generator: seal pots, reboiler, salt cake filter, slurry tank, and dump tank | TONS ADUP |
| o 3-07-001-99 | Chlorine dioxide storage tanks (2) | TONS ADUP |
| o 3-07-001-99 | Sodium hypochlorite storage tank | TONS ADUP |
| o 3-07-001-99 | Sodium chlorate mix tank | TONS ADUP |
| o 3-07-001-99 | Sodium chlorate storage tank | TONS ADUP |

PERMITTEE:
The Procter & Gamble
Cellulose Company

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Expiration Date: December 31, 1992

Source Classification Codes cont'd:

| | | |
|---------------|---|-----------|
| o 3-07-001-99 | Chlorine or chlorine dioxide stage reaction tower | TONS ADUP |
| o 3-07-001-99 | Caustic stage extraction towers (2) | TONS ADUP |
| o 3-07-001-99 | Sodium hypochlorite stage reaction tower | TONS ADUP |
| o 3-07-001-99 | Chlorine dioxide stage reaction towers (2) | TONS ADUP |
| o 3-07-001-99 | Washers (4) | TONS ADUP |

The sources shall be constructed in accordance with the permit application, plans, documents, supplementary material, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Applications to Construction Air Pollution Sources, DER Form 17-1.202(1), received November 1, 1989.
2. Mr. Ray Andreu's letter with attachments received November 20, 1989.
3. "Proposed Permitting Strategy" document submitted as an attachment to the application packages and, with verbal agreement, amended 10/31/89 during a meeting at the Bureau of Air Regulation.
4. The Technical Evaluation and Preliminary Determination dated January 24, 1990.
5. Mr. Ray Andreu's letter with attachments received February 26, 1990.
6. Mr. Ray Andreu's letter with attachments received March 26, 1990.
7. The Technical Evaluation and Preliminary Determination dated April 12, 1990.
8. Mr. Ray Andreu's letter received May 17, 1990.

PERMITTEE:
The Procter & Gamble
Cellulose Company

Permit Number: AC 62-172092
Expiration Date: December 31, 1992

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 these 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 no title to land or water, does not constitute State recognition or acknowledgement 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 permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
The Procter & Gamble
Cellulose Company

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GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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 records 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.

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 noncompliance, 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.

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The Procter & Gamble
Cellulose Company

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Expiration Date: December 31, 1992

GENERAL CONDITIONS:

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 proscribed 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 17-4.120 and 17-30.300, 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 compliance with New Source Performance Standards (NSPS).

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.

PERMITTEE:
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Cellulose Company

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GENERAL CONDITIONS:

- 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 measurements;
 - 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.

SPECIFIC CONDITIONS:

A. General

1. The No. 2 Bleach Plant is permitted to operate continuously (i.e., 8760 hrs/yr).
2. Objectionable odors shall not be allowed off the facility's property in accordance with F.A.C. Rule 17-2.620(2).
3. The No. 2 Bleach Plant is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4.

PERMITTEE:
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Cellulose Company

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SPECIFIC CONDITIONS:

4. The No. 2 Bleach Plant is subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.
5. For reasonable assurance purposes in issuing this construction permit, the permittee's "Proposed Permitting Strategy", which is an attachment to the application packages received October 31, 1989, is adopted by reference and as amended during the application submittal and review meeting held at the Bureau of Air Regulation (BAR) on October 31, 1989. Any deviation(s) from this strategy will require Departmental approval.
6. Referencing Specific Condition No. A.5, a quarterly progress report on the No. 2 Bleach Plant modification shall be submitted to the Department's Northeast District and BAR.
7. For PSD tracking purposes, the projected potential VOC emissions from the methanol storage tank are 3.6 TPY.
8. The methanol storage tank is subject to the applicable provisions of 40 CFR 60, Subpart Kb, in accordance with F.A.C. Rule 17-2.660. Specifically, the source is subject to the provisions of 40 CFR 60.116b (a) and (b) (July 1, 1988 version).
9. The methanol storage tank is subject to the provisions of F.A.C. Rules 17-2.620(1): General Pollutant Emission Limiting Standards; 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.
10. The methanol storage tank is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4, and 40 CFR (July 1, 1988 version).
11. Maximum allowable total process input rate of methanol to the chlorine dioxide generation process shall not exceed 2457 gallons/day and 896,805 gallons/year.
12. Maximum product weight of chlorine dioxide from the chlorine dioxide generation process shall not exceed 54 tons/day and 19,710 tons/year.

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SPECIFIC CONDITIONS:

13. Maximum allowable total process input rates shall not exceed:

- a. CEHDED: 660 unbleached bone dry tons/day
- b. DEDED: 900 unbleached bone dry tons/day

B. Post-Construction

1. Before conducting any sampling and analysis, a meeting to establish testing protocol shall be held at the Department. If possible and prior to the meeting, the following information shall be submitted to the Department for evaluation:

- a. Identification of all sources and their associated waste streams, including sources of fugitive emissions, that have the potential to emit chlorine, chlorine dioxide, and chloroform;
- b. Proposed sampling procedures/methods and analysis for determining chlorine, chlorine dioxide, and chloroform emissions (air) and concentrations (waste streams); and,
- c. Proposed testing dates.

2. The Department's Northeast District and BAR shall be notified in writing at least 15 days prior to conducting tests.

3. Test reports shall be submitted to the Department's Northeast District and BAR no later than 45 days after the last sampling run of each test is completed.

4. Mass emissions tests for chlorine, chlorine dioxide, and chloroform, shall be conducted on all emitting sources identified in Specific Condition No. B.1.a., with exception to fugitive emitting sources. Testing shall be conducted with the No. 2 Bleach Plant operating in the CEHDED sequence and then the DEDED sequence, or visa versa.

5. Sources of fugitive emissions of chlorine, chlorine dioxide, and chloroform, shall have their potential emissions quantified/estimated and submitted to the Department's Northeast District and BAR. The submittal should include all calculations, reference material, and assumptions.

PERMITTEE:
The Procter & Gamble
Cellulose Company

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SPECIFIC CONDITIONS:

6. Concentrations of chlorine, chlorine dioxide, and chloroform, shall be quantified/estimated for the waste streams identified in Specific Condition No. B.1.a.

7. Referencing Specific Condition No. B.6., if the mill has already established data that is being requested, the applicant shall submit copies to the Department's Northeast District and BAR for review.

8. Using risk assessment guidelines, the initial property line acceptable ambient concentrations and their averaging times for chloroform, chlorine, and chlorine dioxide, are:

| Chemical | Acceptable Ambient Conc. | Averaging Time |
|---------------------|-----------------------------------|----------------|
| 1. Chloroform | 0.043 ug/m ³ | annual |
| 2. Chlorine | 15.0 ug/m ³ (5ppb) | 8-hour |
| | 3.57 ug/m ³ (1.2 ppb) | 24-hour |
| 3. Chlorine dioxide | 3.0 ug/m ³ (1 ppb) | 8-hour |
| | 0.71 ug/m ³ (0.24 ppb) | 24-hour |

Note: The permittee's "Proposed Permitting Strategy," as amended, will be used to conduct a post-construction emissions evaluation and assessment and these values may be changed.

9. If no further actions are identified in the plan and schedule developed pursuant to No. 2D of the "Proposed Permitting Strategy," then source allowable emission limitations will be established and the construction permit will be amended. If additional action is identified, then allowable time will be established to implement the necessary actions. Then, source allowable emission limitations will be established and the construction permit will be amended. Any further Department action deemed necessary to reduce pollutant emissions from these sources through controls or process changes, or both, will be implemented through State or Federal rule development or voluntary action by the mill. Nothing in this paragraph waives any rights permittee may have under Florida rules and statutes.

10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

PERMITTEE:
The Procter & Gamble
Cellulose Company

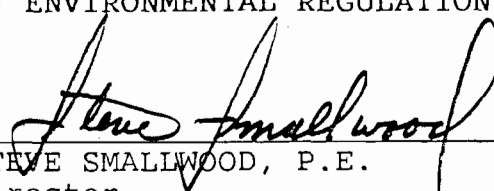
Permit Number: AC 62-172092
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

11. An application for an operation permit must be submitted to the Northeast District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this 5th day
of June, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

April 12, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. C. S. Aiken
Plant Manager
The Procter & Gamble Cellulose Company
Route 3, Box 260
Perry, Florida 32347

Dear Mr. Aiken:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for the permitting, modification, and post construction evaluation of the existing No. 2 Bleach Plant located at the permittee's existing mill in Perry, Taylor County, Florida. The modification will allow the No. 2 Bleach Plant to operate a bleaching sequence of DEDED and to maintain the capability to operate the existing bleaching sequence of CEHDED.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.
Chief

Bureau of Air Regulation

CHF/BM/t

Attachments

cc: A. Kutyna, NE District
R. Andreu, P & GCC
A. Kinghorn, P.E., SEC

4-16-90
@ 4:49

Spoke D Michelle. Message
that the TE & PN was mailed
Today w a "cc" to him. BAN

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

The Procter & Gamble Cellulose Co. DER File No. AC 62-172092
Route 3, Box 260
Perry, Florida 32347

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, The Procter & Gamble Cellulose Company, applied on November 1, 1989, to the Department of Environmental Regulation to obtain a construction permit for the modification of the existing No. 2 Bleach Plant. The modification will allow the No. 2 Bleach Plant to operate a bleaching sequence of DEDED (D: chlorine dioxide; E: caustic extraction) and to maintain the capability to operate the existing bleaching sequence of CEHDED (C: chlorination; H: sodium hypochlorite). The proposed project will occur at the applicant's existing facility located in Perry, Taylor County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

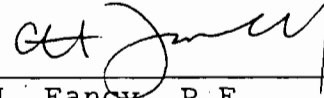
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such

person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copies furnished to:

A. Kutyna, NE District
R. Andreu, P & GCC
A. Kinghorn, P.E., SEC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 4-16-90.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Kyrn D. Joken
Clerk

4-16-90
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to The Procter & Gamble Cellulose Company, Rt. 3, Box 260, Perry, Florida 32347, for the modification of the existing No. 2 Bleach Plant located at the permittee's existing mill in Perry, Taylor County, Florida. The modification will allow the No. 2 Bleach Plant to operate a bleaching sequence of DEDED (D: chlorine dioxide; E: caustic extraction) and to maintain the capability to operate the existing bleaching sequence of CEHDED (C: chlorination; H: sodium hypochlorite). A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

The Procter & Gamble Cellulose Company
Taylor County
Perry, Florida

Construction Permit Number
AC 62-172092

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

April 12, 1990

I. Application

A. Applicant

The Procter & Gamble Cellulose Company
Route 3, Box 260
Perry, Florida 32347

B. Project

The applicant has applied for a construction permit to modify the mill's existing No. 2 Bleach Plant, which is primarily used to produce diaper-related pulp. The proposed modification will include the following:

1. Replace the existing R-2 chlorine dioxide generation process (Figure 1) with a R-8 chlorine dioxide generation process (Figure 2), which will produce a chlorine dioxide solution that is virtually free of molecular chlorine, eliminate the use of sodium hypochlorite, and reduce emissions of chlorine and chloroform (formed mainly in the chlorine and sodium hypochlorite stages). However, methanol (VOC) emissions will occur due to the process change.
2. The existing chlorination towers will be replaced with a new D stage upflow/downflow tower and equipped with a new chilled water scrubber.
3. The existing sodium hypochlorite stage will be by-passed, but kept on a stand-by basis in order to produce other grades of pulp.
4. The scrubbers on the existing D2 and D3 stage towers will be maintained and evaluated for adequacy.
5. A new alkaline scrubber will be installed to control emissions from washers and seal pots, except for the E-stages (caustic extraction).
6. Installation of a new methanol storage tank (40 CFR 60, Subpart Kb).
7. Installation of a new sodium chlorate storage tank, a new sodium chlorate mix tank, a new cooling tower, two new water chillers, and two new chlorine dioxide storage tanks.
8. A new sulfuric acid storage tank will be installed as a replacement for two existing ones.

The proposed project will occur at the applicant's existing mill located Southeast of Perry on County Road 30. The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

C. Process and Controls

1. General

After the wood chips have been pressure cooked with an alkaline liquor in the batch digesters and then washed, the pulp is screened and sent to the Nos. 1 and 2 Bleach Plants where it is reacted with various chemicals in a sequence for purification, brightening and viscosity control. Chemicals are added in retention towers, and reactants are removed in washers. After being bleached, the pulp is dried on the paper machine and finished to customer specifications.

2. Existing No. 2 Bleach Plant

The existing No. 2 Bleach Plant utilizes a six-stage bleaching sequence (Figure 3) commonly referred to as CEHDED (C: chlorination; E: caustic extraction; H: sodium hypochlorite; and, D: chlorine dioxide). The chlorine dioxide solution is manufactured in a chemical generator employing the R-2 process which reacts sodium chlorate, sodium chloride and sulfuric acid to form a chlorine dioxide/chlorine gas mixture that is absorbed in chilled water and stored in connected storage tanks (supplies both bleach plants).

3. Proposed No. 2 Bleach Plant

After completion of the modification, the No. 2 Bleach Plant will normally employ a DEDED sequence (Figure 4) when producing diaper-related pulp. However, the mill wants to maintain the ability to produce other grade pulps, which will employ a CEHDED sequence (Figure 5), by utilizing the existing sodium hypochlorite stage and supplying chlorine to the first stage.

The existing R-2 chlorine dioxide generation process will be replaced with a new R-8 chlorine dioxide generation process, which will react sodium chlorate, sodium chloride, methanol and sulfuric acid to form a chlorine dioxide solution that is virtually free of molecular chlorine.

Chlorine dioxide emissions will be controlled using chilled water scrubbers. When chlorine is in use, an alkaline scrubber will be used to control the emissions. Chloroform emissions will be reduced when using the DEDED sequence, because the main sources of chloroform generation are the chlorine (C) and sodium hypochlorite (H) bleaching stages.

Potential emissions of methanol will occur from two areas, the chlorine dioxide generation process and the storage tank activities (filling, storage and working). Since the R-8 process reactions are driven by the presence of methanol, relief vent

releases will be halted by interruption of the methanol flow when there are process problems. VOC emissions from the storage tank are considered fugitive.

Filtrates from the chlorine dioxide stage washers, the extraction stage, and the sodium hypochlorite stage (CEHDED sequence), are sewered and treated in the wastewater treatment plant.

There is concern over the constituents of the sewered materials/filtrates because of their volatility and potential to be emitted into the atmosphere from the sewers and the wastewater treatment plant. A post construction evaluation of the sewered materials/filtrates will be conducted to quantify/estimate the emissions from the sewers and wastewater treatment plant.

D. Source Classification Codes

| | | |
|---------------|--|--|
| o 4-07-008-15 | Methanol storage tank-breathing loss | 10 ³ gals storage capacity |
| o 4-07-008-16 | Methanol storage tank-working loss | 10 ³ gals used per year |
| o 3-07-001-99 | Chlorine dioxide generator: seal pots, reboiler, salt cake filter, slurry tank, and dump tank | TONS ADUP |
| o 3-07-001-99 | Chlorine dioxide storage tanks (2) | TONS ADUP |
| o 3-07-001-99 | Sodium hypochlorite storage tank | TONS ADUP |
| o 3-07-001-99 | Sodium chlorate mix tank | TONS ADUP |
| o 3-07-001-99 | Sodium chlorate storage tank | TONS ADUP |
| o 3-07-001-99 | Chlorine or chlorine dioxide stage reaction tower | TONS ADUP |
| o 3-07-001-99 | Caustic stage extraction towers (2) | TONS ADUP |
| o 3-07-001-99 | Sodium hypochlorite stage reaction tower | TONS ADUP |
| o 3-07-001-99 | Chlorine dioxide stage reaction towers (2) | TONS ADUP |
| o 3-07-001-99 | Washers (4) | TONS ADUP |

II. Rule Applicability

The proposed project is subject to preconstruction review in accordance with Section 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July 1, 1988 version).

The application package was deemed complete on November 20, 1989.

Since the bleach plant is not exempted from permitting pursuant to F.A.C. Rule 17-2.210(3), the mill was required to obtain a construction permit for the proposed modification.

The existing facility is located in an area designated attainment pursuant to F.A.C. Rule 17-2.420.

The pollutant emissions to be expected from the proposed bleach plant operations are methanol (a VOC), chlorine, chlorine dioxide, and chloroform.

Review of the potential methanol emissions of 3.3 TPY from the storage tank and bleach plant operations shall be in accordance with F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration (PSD) or Nonattainment Requirements, and 40 CFR (July 1, 1988 version).

Pursuant to F.A.C. Rule 17-2.660, the methanol storage tank is subject to the Standards of Performance for Volatile Organic Liquid Storage Vessel, 40 CFR 60, Subpart Kb.

The methanol storage tank is subject to F.A.C. Rules 17-2.620(1) and (2): General Pollutant Emission Limiting Standards; 17-2.240: Circumvention; 17-2.250: Excess Emissions; 17-2.660: Standards of Performance for New Stationary Sources; and, 17-4.130: Plant Operation-Problems.

The methanol storage tank is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4, and 40 CFR (July 1, 1988 version).

As a first tier level of review, the pollutants chlorine, chlorine dioxide, and chloroform, were evaluated in accordance with F.A.C. Rule 17-2.520, with considerations given to carcinogenicity and toxicity using risk assessment guidelines. Through these considerations, initial property line acceptable ambient concentrations were established for each pollutant along with the appropriate averaging times.

Since neither State nor Federal ambient standards for chlorine, chlorine dioxide, and chloroform have yet been adopted, for reasonable assurance purposes (in accordance with F.A.C. Rule 17-2.200) in issuing this construction permit, the permittee's "Proposed Permitting Strategy" (Exhibit 1) will be used to conduct a post-construction emissions evaluation and assessment.

During the application submittal and review meeting on October 31, 1989 (fee received November 1, 1989), it was verbally agreed to amend the strategy contained in No. 2.A. of the "Proposed Permitting Strategy", to include other sources of potential emissions of chlorine, chlorine dioxide, and chloroform, that would contribute to the property line concentrations.

III. Summary of Emissions

A. Emission Limitations

The pollutants to be regulated from the No. 2 Bleach Plant and associated waste streams are VOC (methanol), chlorine, chlorine dioxide, and chloroform in accordance with F.A.C. Chapters 17-2 and 17-4, and 40 CFR (July 1, 1988 version).

For PSD tracking purposes, the following table will present the potential VOC emissions from the methanol storage tank and process:

| Table 1 | | |
|-----------------------|-----------|------------------------------|
| Source | Pollutant | PSD Emissions Tracking (TPY) |
| Methanol Storage Tank | VOC | |
| 1. Working Loss | | 0.6 |
| Process | VOC | |
| 1. Fugitives | | 3.0 |
| | Total | 3.6 |

- Note: 1. Hours of operation at 8760
 2. Storage tank volume: 37,000 gallons
 3. Turnovers per year: <25

The following table will present the initial property line acceptable ambient concentrations and their averaging times for chloroform, chlorine, and chlorine dioxide:

| Table 2 | | |
|---------------------|-----------------------------------|----------------|
| Chemical | Acceptable Ambient Conc. | Averaging Time |
| 1. Chloroform | 0.043 ug/m ³ | annual |
| 2. Chlorine | 15.0 ug/m ³ (5ppb) | 8-hour |
| | 3.57 ug/m ³ (1.2 ppb) | 24-hour |
| 3. Chlorine dioxide | 3.0 ug/m ³ (1 ppb) | 8-hour |
| | 0.71 ug/m ³ (0.24 ppb) | 24-hour |

Note:

1. Since chloroform is a carcinogen with an EPA unit risk value (a measure of its carcinogenic potency) and the facility will continuously emit this chemical, the initial acceptable ambient concentration is based on providing protection from the long-term exposure to chloroform. The level of protection, that corresponds to a one-in-a-million increased risk of developing cancer from continuous exposure to chloroform, is calculated by dividing $1.0E-6$ by $2.3E-5$ (the unit risk factor for chloroform). The resulting quotient is the initial acceptable ambient concentration. Since the health concern is for long-term exposure (and the unit risk factor reflects a 70-year exposure), the averaging time should be on an annual basis.
2. Chlorine is not a carcinogen but has an occupational exposure level (TLV) of 0.5 ppm (1.5 mg/m^3). The initial acceptable ambient concentration is based on providing two orders of magnitude below the occupational level. The two orders of magnitude represent protection for the differences between healthy workers and the more sensitive public, and the public's potential exposure to multiple chemicals, which may exert synergistic effects, or may produce exposures through other environmental media.

The first ambient guideline is based on an 8-hour average concentration, as is the occupational exposure level. An additional protection factor which takes into account the public's continuous exposure, compared to a worker's exposure, which ceases in 8 hours, is provided by the longer-term 24-hour guideline. For the 24-hour guideline, the 8-hour guideline is divided by 4.2, which is the ratio between a 168-hour week of public exposure to a continuous emission and a worker's exposure to 40 hours of the toxic. The 24-hour guideline does not need to be used for batch operations or processes which operate for less than 8 hours. If a process can pass the 8-hour ambient guideline and does not operate more than 8 hours, then its average ambient concentration for 24 hours will be well below the 24-hour guideline.

3. The initial acceptable ambient concentration for chlorine dioxide* is derived by the same methodology as was used for chlorine. The occupational exposure level is 0.3 mg/m^3 (0.1 ppm). Dividing the TLV by 100 gives the 8-hour acceptable ambient concentration, and dividing the TLV by 420 gives the 24-hour guideline.

* A side note to add is that the facility representatives indicated that chlorine dioxide is very reactive and rapidly breaks down to chlorine in the atmosphere. An acceptable ambient concentration guideline may not be appropriate for chlorine dioxide, but the facility needs to provide verification for that statement.

B. Ambient Air Quality Analysis

Modeling will be performed in accordance with No. 2.B. of the "Proposed Permitting Strategy" (Exhibit 1).

IV. Conclusion

Based on the information and reasonable assurance commitments provided by The Procter & Gamble Cellulose Company, the Department has reasonable assurance that the modification to the No. 2 Bleach Plant and associated processes, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.

James K. Pennington
No. 34536
4/16/90

THE PROCTER & GAMBLE CELLULOSE COMPANY
R-2 PROCESS FLOW DIAGRAM

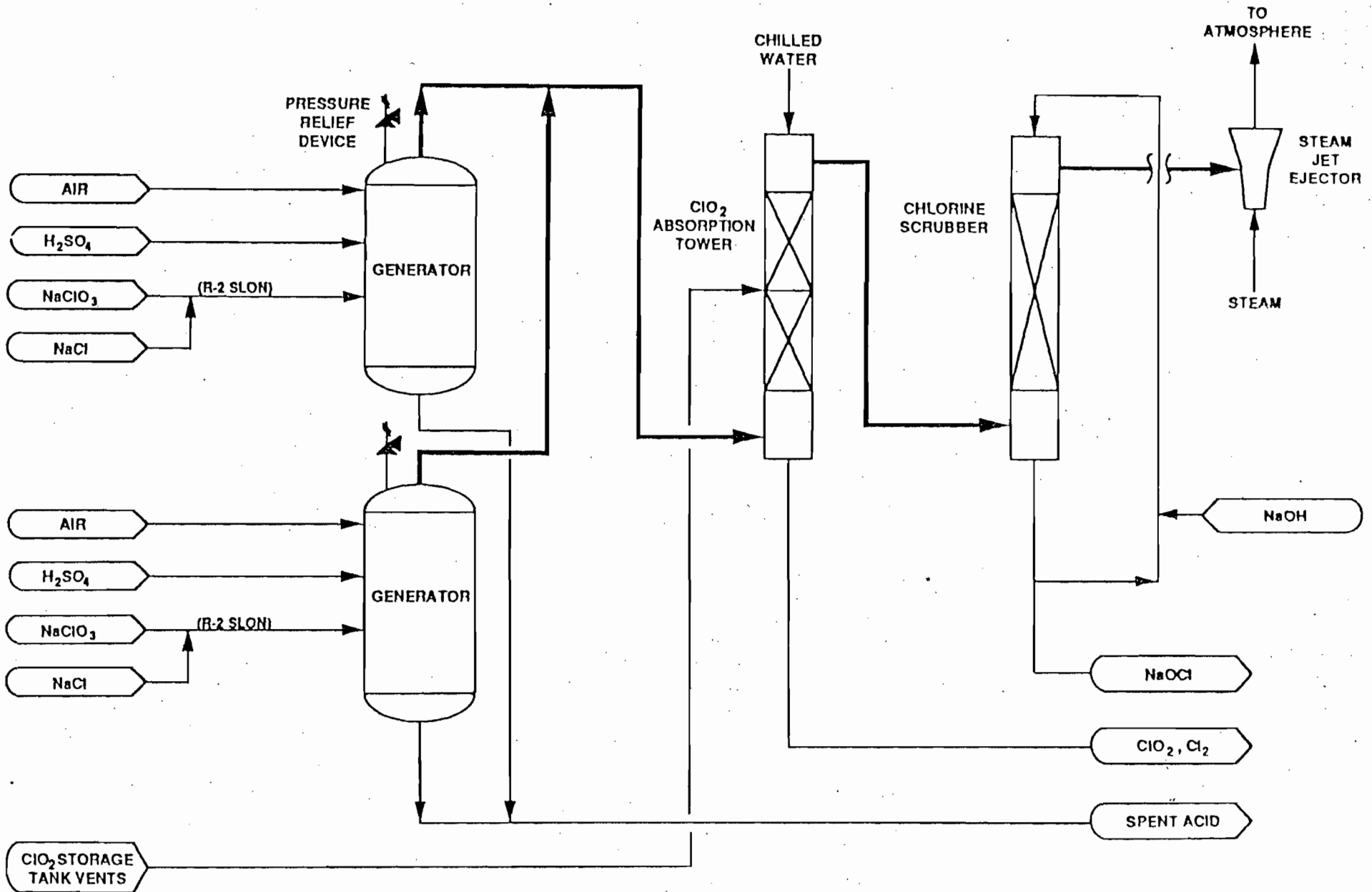


FIGURE 1

THE PROCTER & GAMBLE CELLULOSE COMPANY
PROPOSED R - 8 PROCESS FLOW DIAGRAM

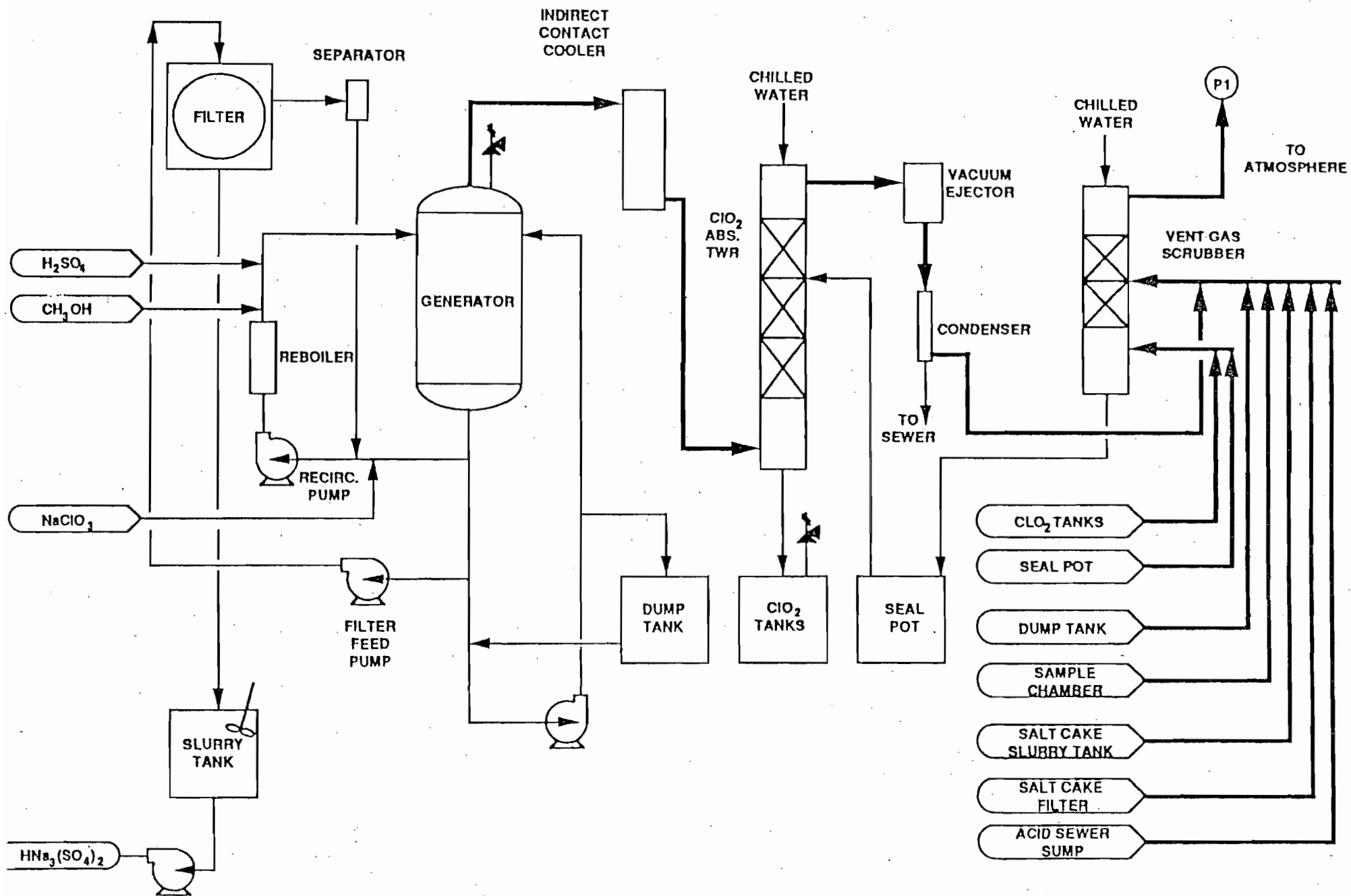


FIGURE 2

THE PROCTER & GAMBLE CELLULOSE COMPANY
EXISTING NO. 2 BLEACH PLANT FLOW DIAGRAM

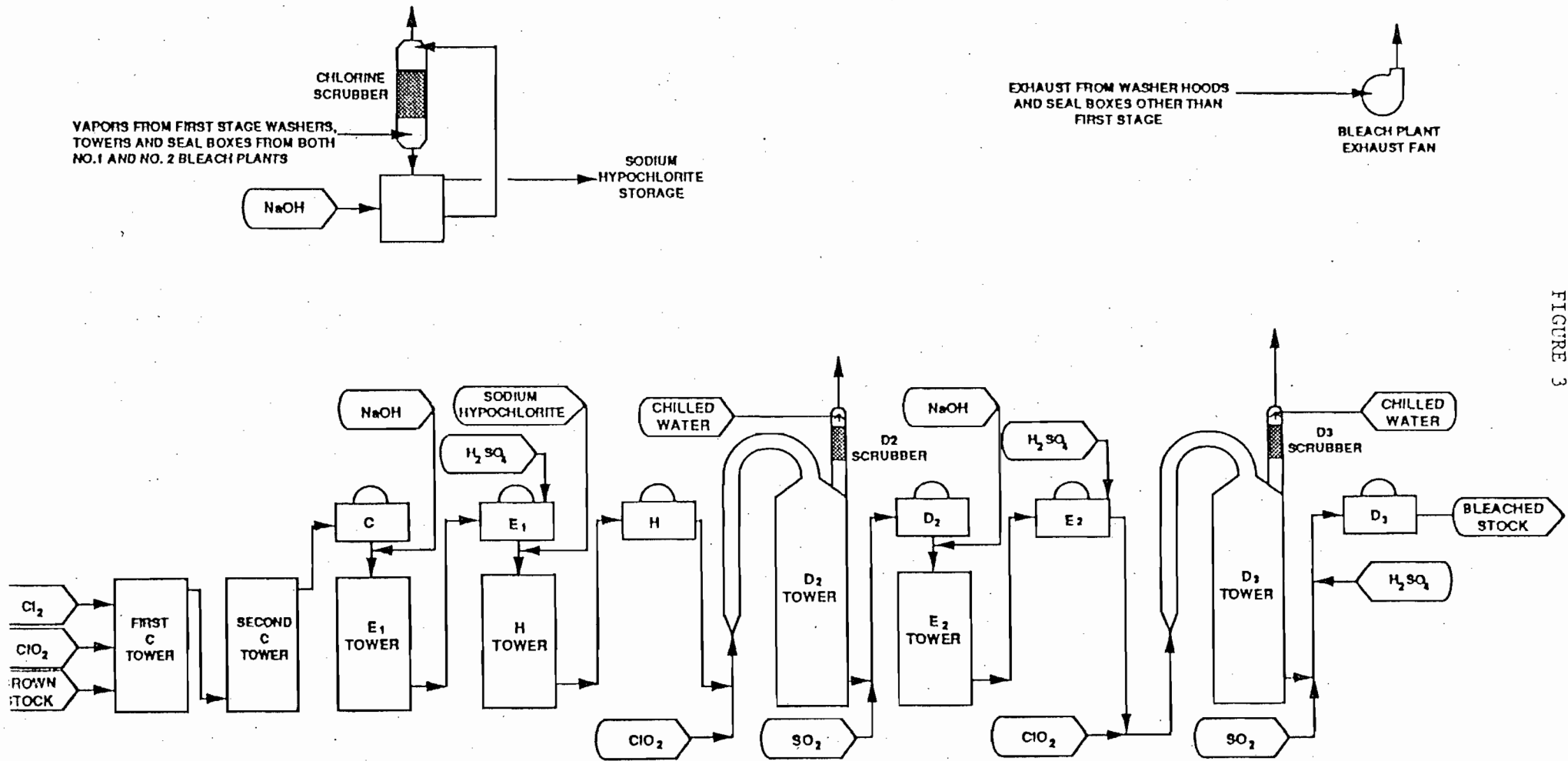
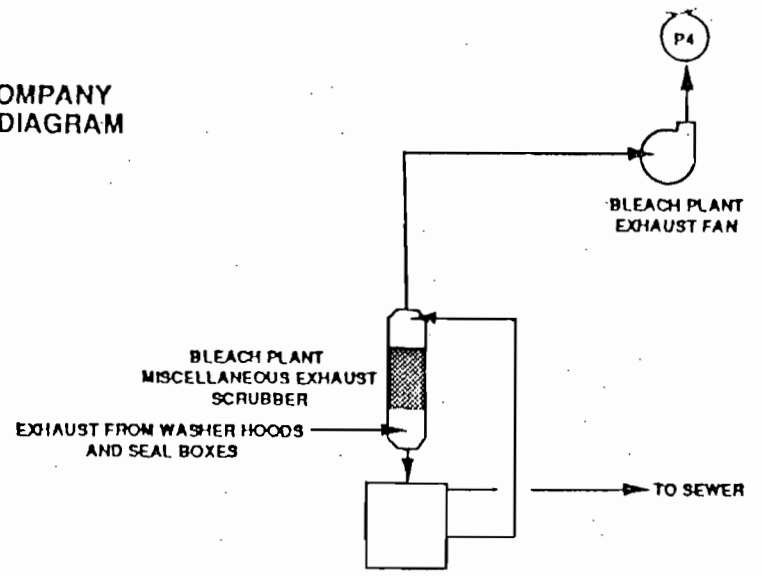
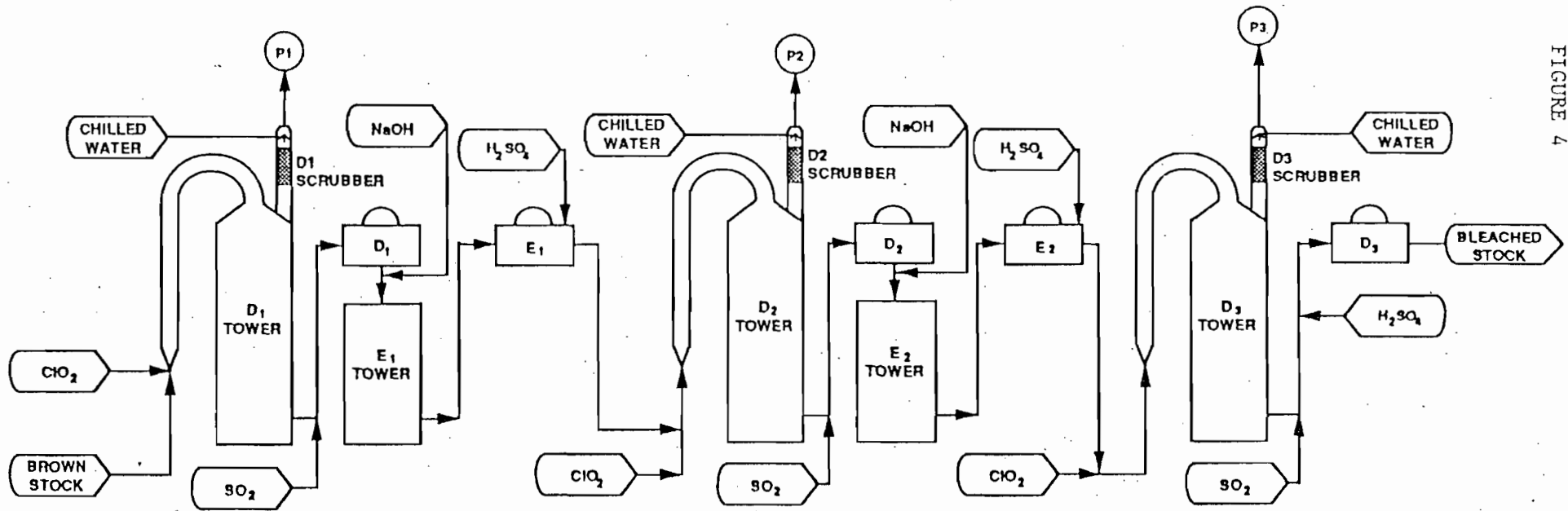


FIGURE 3

THE PROCTER & GAMBLE CELLULOSE COMPANY
 PROPOSED NO. 2 BLEACH PLANT FLOW DIAGRAM
 DEDED SEQUENCE



Note: D1 stage washer and seal box vented to Bleach Plant Miscellaneous Exhaust Scrubber during DEDED sequence.

FIGURE 4

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THE PROCTER & GAMBLE CELLULOSE COMPANY
PROPOSED NO. 2 BLEACH PLANT FLOW DIAGRAM
CEHDED SEQUENCE

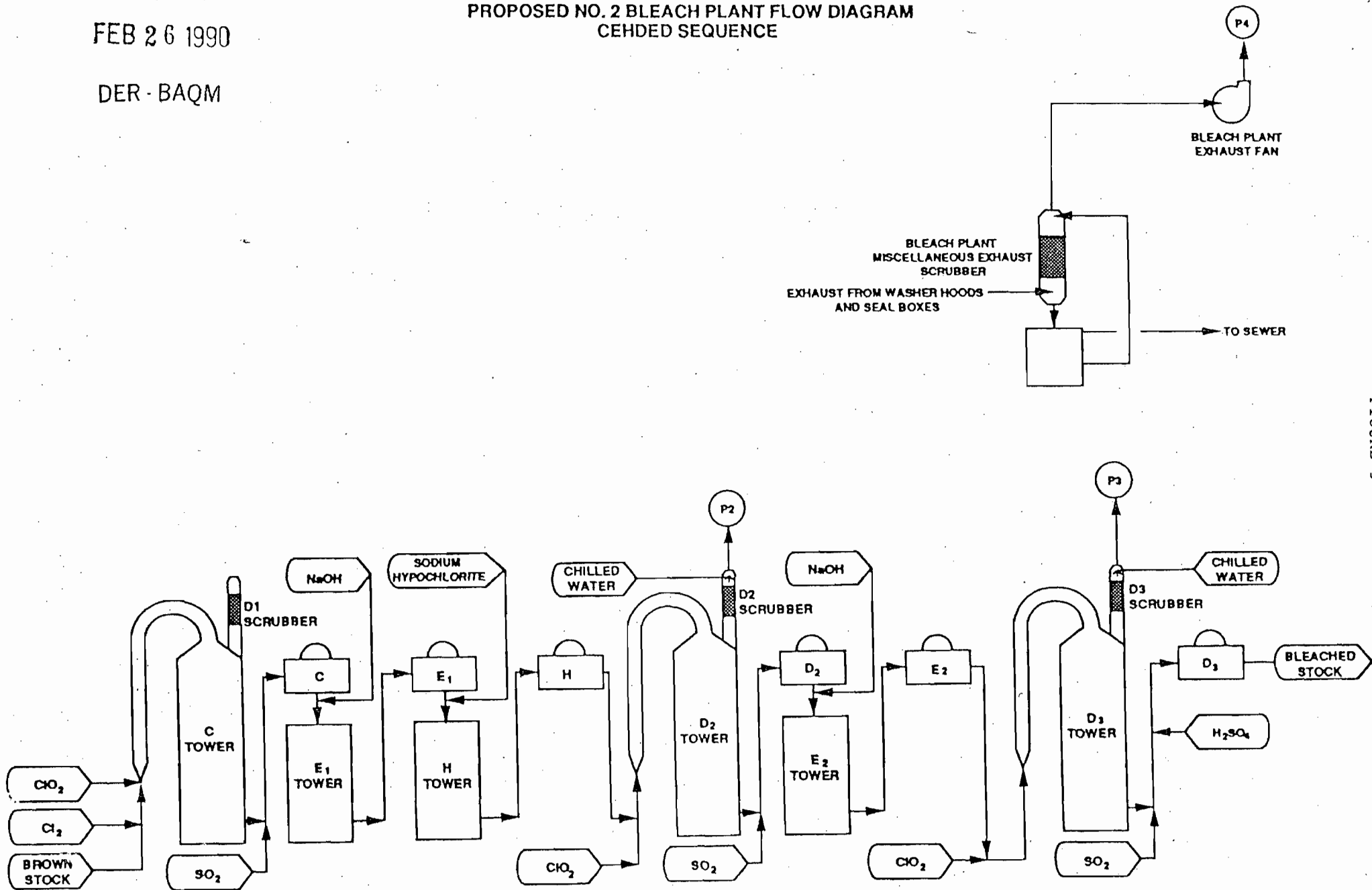


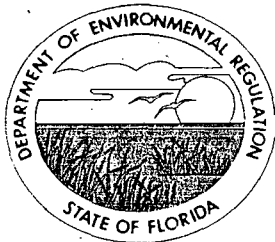
FIGURE 5

**#2 Bleach Plant Modifications and
Chlorine Dioxide Generation Process
Replacement Project**

Proposed Permitting Strategy

- 1) Approve the enclosed air construction permit applications for the proposed #2 Bleach Plant modifications and the Chlorine Dioxide generation process replacement project, which includes identified emissions control equipment.
- 2) As a condition in the construction permits, include the following requirements:
 - A. Within three months following construction completion, start-up, and achievement of reliable operations, emissions of chlorine, chlorine dioxide, and chloroform will be measured, using testing methods agreed upon by the FDER and the permittee, at the appropriate points in the #2 Bleach Plant and the R-8 Chlorine Dioxide Generation Process: *and other sources of these emissions (amended during 10/31/89 meeting).*
 - B. Within one month following receipt of the measurements in Item A, the measured emissions will be subjected to initial air toxics screening using criteria agreed to by the FDER and the permittee.
 - C. The screening results will be used to consider whether:
 - 1) The achieved emissions levels are acceptable; or
 - 2) Additional control measures needed to meet the initial screening criteria are available and practical; or
 - 3) Detailed risk assessments are necessary to ensure that the practically achievable emissions are acceptable.
 - D. For any pollutant addressed in this permit that fails to meet the criteria identified in Item B, the permittee shall submit within six months following receipt of screening results, a plan and schedule to the FDER which addresses the factors identified in Item C. The plan may include a recommendation to install additional control measures/process modifications, if needed and available and practical, or a recommendation to develop a risk assessment to demonstrate that the practically achievable emissions are acceptable.
 - E. Air operation permits will not be granted for the #2 Bleach Plant and the Chlorine Dioxide generation process until the plan identified in Item D is approved by the FDER and completed.

If additional time is needed to complete the steps identified in the plan, the construction permit will be extended accordingly.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
The Procter & Gamble Cellulose
Company
Route 3, Box 260
Perry, Florida 32347

Permit Number: AC 62-172092
Expiration Date: Dec. 31, 1992
County: Taylor
Latitude/Longitude: 30°03'59"N
83°33'12"W
Project: No. 2 Bleach Plant and
R-8 Chlorine Dioxide Generator

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July 1, 1988 version). 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:

For the modification of the No. 2 Bleach Plant located at the permittee's existing mill in Perry, Taylor County, Florida. The modification will allow the No. 2 Bleach Plant to operate a bleaching sequence of DEDED (D: chlorine dioxide; E: caustic extraction) and to maintain the capability to operate the existing bleaching sequence of CEHDED (C: chlorination; H: sodium hypochlorite); replace the existing R-2 chlorine dioxide generation process with a R-8 chlorine dioxide generation process; replace or upgrade various control systems; install a methanol storage tank, a sodium chlorate storage tank, a sodium chlorate mixing tank, and two chlorine dioxide storage tanks; replace the existing chlorination towers with a new D stage upflow/downflow tower; install a new water chiller; and, replace the existing two sulfuric acid storage tanks with a new one.

The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

The Source Industrial Codes are: 2611-Pulp Mills.

The Source Classification Codes are:

- | | | |
|---------------|---|---------------------------------------|
| o 4-07-008-15 | Methanol storage tank-breathing loss | 10 ³ gals storage capacity |
| o 4-07-008-16 | Methanol storage tank-working loss | 10 ³ gals used per year |
| o 3-07-001-99 | Chlorine dioxide generator: seal pots, reboiler, salt cake filter, slurry tank, and dump tank | TONS ADUP |
| o 3-07-001-99 | Chlorine dioxide storage tanks (2) | TONS ADUP |
| o 3-07-001-99 | Sodium hypochlorite storage tank | TONS ADUP |
| o 3-07-001-99 | Sodium chlorate mix tank | TONS ADUP |
| o 3-07-001-99 | Sodium chlorate storage tank | TONS ADUP |

PERMITTEE:
The Procter & Gamble
Cellulose Company

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Expiration Date: December 31, 1992

Source Classification Codes cont'd:

| | | |
|---------------|---|-----------|
| o 3-07-001-99 | Chlorine or chlorine dioxide stage reaction tower | TONS ADUP |
| o 3-07-001-99 | Caustic stage extraction towers (2) | TONS ADUP |
| o 3-07-001-99 | Sodium hypochlorite stage reaction tower | TONS ADUP |
| o 3-07-001-99 | Chlorine dioxide stage reaction towers (2) | TONS ADUP |
| o 3-07-001-99 | Washers (4) | TONS ADUP |

The sources shall be constructed in accordance with the permit application, plans, documents, supplementary material, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Applications to Construction Air Pollution Sources, DER Form 17-1.202(1), received November 1, 1989.
2. Mr. Ray Andreu's letter with attachments received November 20, 1989.
3. "Proposed Permitting Strategy" document submitted as an attachment to the application packages and, with verbal agreement, amended 10/31/89 during a meeting at the Bureau of Air Regulation.
4. The Technical Evaluation and Preliminary Determination dated January 24, 1990.
5. Mr. Ray Andreu's letter with attachments received February 26, 1990.
6. Mr. Ray Andreu's letter with attachments received March 26, 1990.
7. The Technical Evaluation and Preliminary Determination dated April 12, 1990.

PERMITTEE:
The Procter & Gamble
Cellulose Company

Permit Number: AC 62-172092
Expiration Date: December 31, 1992

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 these 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 no title to land or water, does not constitute State recognition or acknowledgement 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 permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
The Procter & Gamble
Cellulose Company

Permit Number: AC 62-172092
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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 records 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.

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 noncompliance, 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.

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The Procter & Gamble
Cellulose Company

Permit Number: AC 62-172092
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

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 proscribed 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 17-4.120 and 17-30.300, 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 compliance with New Source Performance Standards (NSPS).

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.

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The Procter & Gamble
Cellulose Company

Permit Number: AC 62-172092
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

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 measurements;
- 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.

SPECIFIC CONDITIONS:

A. General

1. The No. 2 Bleach Plant is permitted to operate continuously (i.e., 8760 hrs/yr).
2. Objectionable odors shall not be allowed off the facility's property in accordance with F.A.C. Rule 17-2.620(2).
3. The No. 2 Bleach Plant is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4.

PERMITTEE:
The Procter & Gamble
Cellulose Company

Permit Number: AC 62-172092
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

4. The No. 2 Bleach Plant is subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.
5. For reasonable assurance purposes in issuing this construction permit, the permittee's "Proposed Permitting Strategy", which is an attachment to the application packages received October 31, 1989, is adopted by reference and as amended during the application submittal and review meeting held at the Bureau of Air Regulation (BAR) on October 31, 1989. Any deviation(s) from this strategy will require Departmental approval.
6. Referencing Specific Condition No. A.5, a quarterly progress report on the No. 2 Bleach Plant modification shall be submitted to the Department's Northeast District and BAR.
7. For PSD tracking purposes, the projected potential VOC emissions from the methanol storage tank are 3.6 TPY.
8. The methanol storage tank is subject to the applicable provisions of 40 CFR 60, Subpart Kb, in accordance with F.A.C. Rule 17-2.660. Specifically, the source is subject to the provisions of 40 CFR 60.116b (a) and (b) (July 1, 1988 version).
9. The methanol storage tank is subject to the provisions of F.A.C. Rules 17-2.620(1): General Pollutant Emission Limiting Standards; 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.
10. The methanol storage tank is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4, and 40 CFR (July 1, 1988 version).
11. Maximum allowable total process input rate of methanol to the chlorine dioxide generation process shall not exceed 2457 gallons/day and 896,805 gallons/year.
12. Maximum product weight of chlorine dioxide from the chlorine dioxide generation process shall not exceed 54 tons/day and 19,710 tons/year.

PERMITTEE:
The Procter & Gamble
Cellulose Company

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Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

13. Maximum allowable total process input rates shall not exceed:
- a. CEHDED: 660 unbleached bone dry tons/day
 - b. DEDED: 900 unbleached bone dry tons/day

B. Post-Construction

1. Before conducting any sampling and analysis, a meeting to establish testing protocol shall be held at the Department. If possible and prior to the meeting, the following information shall be submitted to the Department for evaluation:

- a. Identification of all sources and their associated waste streams, including sources of fugitive emissions, that have the potential to emit chlorine, chlorine dioxide, and chloroform;
- b. Proposed sampling procedures/methods and analysis for determining chlorine, chlorine dioxide, and chloroform emissions (air) and concentrations (waste streams); and,
- c. Proposed testing dates.

2. The Department's Northeast District and BAR shall be notified in writing 15 days prior to conducting tests.

3. Test reports shall be submitted to the Department's Northeast District and BAR no later than 45 days after the last sampling run of each test is completed.

4. Mass emissions tests for chlorine, chlorine dioxide, and chloroform, shall be conducted on all emitting sources identified in Specific Condition No. B.1.a., with exception to fugitive emitting sources. Testing shall be conducted with the No. 2 Bleach Plant operating in the CEHDED sequence and then the DEDED sequence, or visa versa.

5. Sources of fugitive emissions of chlorine, chlorine dioxide, and chloroform, shall have their potential emissions quantified/estimated and submitted to the Department's Northeast District and BAR. The submittal should include all calculations, reference material, and assumptions.

PERMITTEE:
The Procter & Gamble
Cellulose Company

Permit Number: AC 62-172092
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

6. Concentrations of chlorine, chlorine dioxide, and chloroform, shall be quantified/estimated for the waste streams identified in Specific Condition No. B.1.a.

7. Referencing Specific Condition No. B.6., if the mill has already established data that is being requested, please submit copies to the Department's Northeast District and BAR for review.

8. Using risk assessment guidelines, the initial property line acceptable ambient concentrations and their averaging times for chloroform, chlorine, and chlorine dioxide, are:

| Chemical | Acceptable Ambient Conc. | Averaging Time |
|---------------------|-----------------------------------|----------------|
| 1. Chloroform | 0.043 ug/m ³ | annual |
| 2. Chlorine | 15.0 ug/m ³ (5ppb) | 8-hour |
| | 3.57 ug/m ³ (1.2 ppb) | 24-hour |
| 3. Chlorine dioxide | 3.0 ug/m ³ (1 ppb) | 8-hour |
| | 0.71 ug/m ³ (0.24 ppb) | 24-hour |

Note: The permittee's "Proposed Permitting Strategy," as amended, will be used to conduct a post-construction emissions evaluation and assessment and these values may be changed.

9. If no further actions are identified in the plan and schedule developed pursuant to No. 2D of the "Proposed Permitting Strategy," then source allowable emission limitations will be established and the construction permit will be amended. If additional action is identified, then allowable time will be established to implement the necessary actions. Then, source allowable emission limitations will be established and the construction permit will be amended. Any further Department action deemed necessary to reduce pollutant emissions from these sources through controls or process changes, or both, will be implemented through State or Federal rule development or voluntary action by the mill. Nothing in this paragraph waives any rights permittee may have under Florida rules and statutes.

10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

PERMITTEE:
The Procter & Gamble
Cellulose Company

Permit Number: AC 62-172092
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

11. An application for an operation permit must be submitted to the Northeast District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this _____ day
of _____, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

Attachments 1 & 2
Available Upon Request

Attachment 3

**#2 Bleach Plant Modifications and
Chlorine Dioxide Generation Process
Replacement Project**

Proposed Permitting Strategy

- 1) Approve the enclosed air construction permit applications for the proposed #2 Bleach Plant modifications and the Chlorine Dioxide generation process replacement project, which includes identified emissions control equipment.
- 2) As a condition in the construction permits, include the following requirements:
 - A. Within three months following construction completion, start-up, and achievement of reliable operations, emissions of chlorine, chlorine dioxide, and chloroform will be measured, using testing methods agreed upon by the FDER and the permittee, at the appropriate points in the #2 Bleach Plant and the R-8 Chlorine Dioxide Generation Process: *and other sources of these emissions (amended during 10/31/99 meeting).*
 - B. Within one month following receipt of the measurements in Item A, the measured emissions will be subjected to initial air toxics screening using criteria agreed to by the FDER and the permittee.
 - C. The screening results will be used to consider whether:
 - 1) The achieved emissions levels are acceptable; or
 - 2) Additional control measures needed to meet the initial screening criteria are available and practical; or
 - 3) Detailed risk assessments are necessary to ensure that the practically achievable emissions are acceptable.
 - D. For any pollutant addressed in this permit that fails to meet the criteria identified in Item B, the permittee shall submit within six months following receipt of screening results, a plan and schedule to the FDER which addresses the factors identified in Item C. The plan may include a recommendation to install additional control measures/process modifications, if needed and available and practical, or a recommendation to develop a risk assessment to demonstrate that the practically achievable emissions are acceptable.
 - E. Air operation permits will not be granted for the #2 Bleach Plant and the Chlorine Dioxide generation process until the plan identified in Item D is approved by the FDER and completed.

If additional time is needed to complete the steps identified in the plan, the construction permit will be extended accordingly.

Attachments 4, 5 & 6
Available Upon Request



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

TO: Clair Fancy
 THROUGH: Ed Middleswart *Edm 1/27*
 FROM: Jack Preece *Jack*
 DATE: January 27, 1988
 SUBJECT: Champion International Corporation,
 Toxic Evaluation of Bleach Plant
 Ref: 1) AC17-113551
 2) Final Air Stripper Review Procedures

For Routing To Other Than The Addressee

| | |
|-------------|-----------------|
| To: _____ | Location: _____ |
| To: _____ | Location: _____ |
| To: _____ | Location: _____ |
| From: _____ | Date: _____ |

DER

JAN 28

BAQM

During review of applications submitted for operation permits for sources constructed by Champion International Corporation under reference 1, a check of allowed emissions against the guidelines of reference 2 was carried out. The worst case comparison was 3.7 pounds of ClO₂ per hour allowed from the tail gas of the ClO₂ generation system. The conservative estimate of maximum ambient concentration, using equation in reference 2 is:

$$\begin{aligned} \text{MAC} &= \text{ACH}^B \\ &= 327.84 \cdot 37(100)^{-2.264} \\ &= 0.0360 \text{ mg/meter}^3 \end{aligned}$$

H is 100 feet as reported in the emissions test report (test date November 20, 1987) this contrasts to H = 60 feet stated in original application for construction permit.

The acceptable ambient concentration proposed in reference 2 for ClO₂ is:

$$\begin{aligned} \text{AAC} &= 0.238 \text{ (TLV/A)} \\ \text{where } A &= 100 \text{ (CAT}_3\text{A)} \\ \text{TLV} &= 0.3 \text{ mg/m}^3 \\ &= 0.238 (0.3/100) = 0.000714 \text{ mg/m}^3 \end{aligned}$$

This appraisal revealed the allowed emissions failed the screening test for acceptable toxic emissions by a ratio of:

$$\frac{0.0360}{0.000714} = 50.4$$

If the reference 2 guidance or some other toxic screening procedure had been in effect at the time the AC was under review, I am sure a more sophisticated modelling would have been required and probably reduced allowed emissions would have been specified.

Memo to Clair Fancy
Re: Champion Bleach Plant
January 27, 1988
Page two

I recommend that BAQM should take on the task of running more sophisticated modelling to determine what emissions will comply with the proposed AAC. The more sophisticated modelling should be less conservative than the reference 2 equation in the following:

- 1) Include plume rise due to exit velocity from the stack (ACFM 910, Stack diameter 10 inches)
- 2) Use 5 years of actual meteorological data vs worst case meteorological assumption of reference 2
- 3) Time average calculated ambient concentrations vs instantaneous maximum concentration, assumption of reference 2. I recommend time averaging should equal 168 hours.
- 4) Receptors should be located at plant property lines vs maximum location assumed by reference 2.

Additionally, the impact of four other sources of Cl_2 and ClO_2 emissions combined with the one worst case source discussed above should be evaluated.

In the meantime, I plan to recommend issuance of operation permits with allowed emissions as specified in the AC, but with the condition that more stringent allowed emissions forthcoming from toxics rulemaking shall be applied. Further, the permit shall contain surrogate parameter limits to assure actual emissions measured by test (0.35 pounds per hour) are continued.

JP/jpl

cc: Steve Smallwood

Copied. Bruce Mitchell }
Barry Anderson } 1.28.88mm
CHF/BT }

NO. 2 BLEACH PLANT
MODIFICATION PROJECT

AIR PERMIT APPLICATION

THE PROCTER & GAMBLE CELLULOSE COMPANY
FOLEY PLANT

PERRY, FLORIDA

SEC JOB NO. G-9263

OCTOBER, 1989

PREPARED BY:

SIRRINE ENVIRONMENTAL CONSULTANTS
GREENVILLE, SOUTH CAROLINA

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1. INTRODUCTION

This report contains the air construction permit application for changes that will be made to the No. 2 Bleach Plant at The Procter & Gamble Cellulose Company Foley Plant in Perry, Florida. These changes, which are being voluntarily made in response to European market concerns about chlorine bleaching, involve the development of a process for producing diaper-related pulp using a chlorine dioxide solution that is virtually free of molecular chlorine and elimination of the use of sodium hypochlorite. This process modification is expected to result in a reduction of approximately 50% of the total plant use of molecular chlorine, which will also significantly reduce the potential for the formation of 2,3,7,8 tetrachloro-dibenzo-p-dioxin and other chloro-organic compounds. The proposed modifications will result in reduced air emissions of chlorine and chloroform, which is formed mainly in the chlorine and sodium hypochlorite stages, from the No. 2 Bleach Plant. Improved scrubbing will result in a reduction of chlorine dioxide emissions.

The Procter & Gamble Cellulose Company has historically been a leader in air emissions control. In 1970, a high energy tail gas scrubber was installed on the existing chlorine dioxide generation facility. The following year, collection and wet scrubbing systems were installed on all chlorine and chlorine dioxide stages in the bleach plant. As a result, the Procter & Gamble Cellulose Company was the first pulp mill in Florida to control bleach plant related emissions.

This project will replace the existing R-2 chlorine dioxide generation process with an R-8 generation process, which produces a chlorine dioxide solution that is virtually free of molecular chlorine, and modify the No. 2 Bleach Plant to enable the use of this new bleaching solution. As is presently the case, provisions will remain to produce dissolving grade pulps in the No. 2 Bleach Plant in the event that market conditions warrant.

The No. 1 Bleach Plant will remain unchanged at this time because the technology to produce dissolving grade pulps without the use of molecular chlorine has not yet been developed.

The proposed changes to the chlorine dioxide generation process are covered in the report entitled: Chlorine Dioxide Generation Process Replacement Project - Air Permit Application.

2. APPLICABLE REGULATIONS

The No. 1 and No. 2 Bleach Plant processes were initially permitted by the Florida Department of Environmental Regulation (DER), formerly known as the Florida Department of Pollution Control, on May 18, 1973 and renewed on May 15, 1975. On January 25, 1980, the Procter & Gamble Cellulose Company was notified by the DER that it would not be necessary for these permits to be renewed in the future. However, the DER did request that they be notified prior to the implementation of future changes to these processes. Since this project seeks to modify the No. 2 Bleach Plant, this air construction permit application package serves as notice to the DER of proposed changes.

Current State of Florida air permitting regulations require the submittal of air permit applications for DER review prior to the construction of a new source or modification of an existing source which will result in an increase in emission levels of pollutants regulated under Chapter 17-2, F.A.C. While the proposed modifications to the No. 2 Bleach Plant do not involve air pollutants that are regulated under Chapter 17-2, F.A.C., and will in fact reduce air toxics emissions, the DER has requested the submittal of an air construction permit application due to emerging concerns about air toxics.

Although no specific existing emission limiting standards apply to this modification, the DER is developing air toxics review guidelines that will be used to assess proposed projects of this nature. The procedure to be followed in applying these guidelines is to model the air emissions of concern to evaluate the potential ground-level impact at the facility property line. In the absence of promulgated allowable ambient concentrations, the ground-level impact assessment will utilize criteria that are based on unit risk factors or derived fractions of existing allowable workplace exposure standards. These recommended criteria will then be used as a screening mechanism to evaluate the emissions from a process.

3. FOLEY PLANT DESCRIPTION

3.1 USGS Location

Figure 1 shows the USGS location of the plant site. The plant is located at Universal Transverse Mercator (UTM) coordinates of approximately 256.74 kilometers east and 3,328.70 kilometers north.

3.2 Site Plot Plan

Figure 2 shows the location of the No. 2 Bleach Plant.

3.3 Plant Process Description

Figure 3 is a simplified flow diagram representative of the kraft pulping process used at the Procter & Gamble Cellulose Foley Plant. Wood chips are charged into batch digesters where they are cooked under pressure in alkaline liquor containing sodium hydroxide and sodium sulfide. The cooked chips are blown from the digester and washed in a three-stage, counter current washing system. Wash liquor from these stages, known as black liquor, contains organics extracted from the wood as well as the spent cooking chemicals. The black liquor is concentrated and sent to a recovery furnace, where the organics are burned as fuel and the inorganics are recovered as smelt. The cooking chemicals are recovered from the smelt by reacting it with lime and removing the lime mud that is formed in the reaction. The lime mud is filtered and calcined in a kiln to recover the lime for re-use.

After being washed, the pulp is screened and enters the bleach plant where it is reacted with chlorine, caustic, sodium hypochlorite and chlorine dioxide for purification, brightening and viscosity control. Chemicals are added in retention towers, and reactants are removed in washers. The chlorine dioxide solution is manufactured on site in a chemical generator

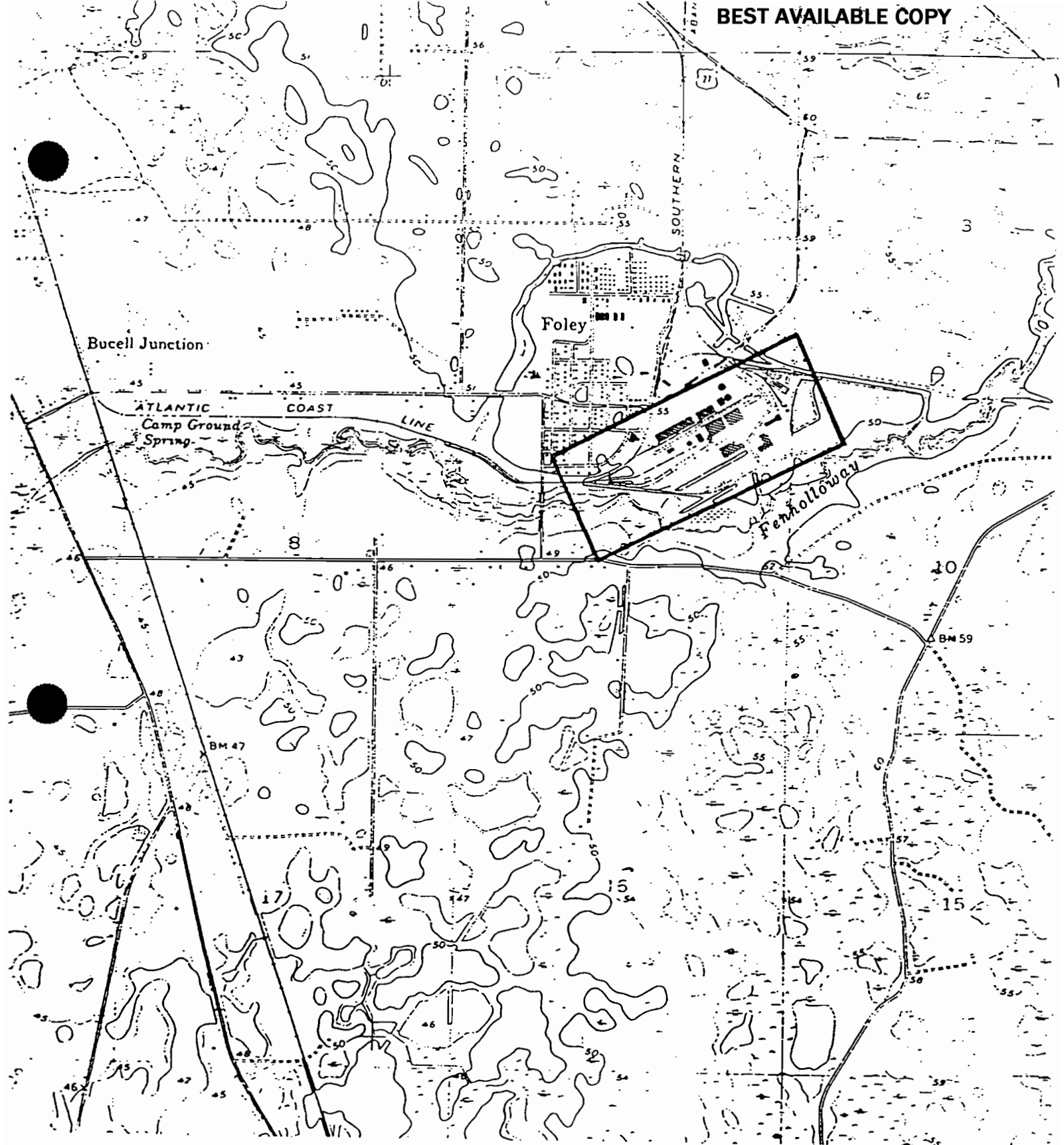


FIGURE 1

U.S.G.S. Location Map

Procter & Gamble Cellulose Co.

Foley Plant — Perry, Florida

G-9263



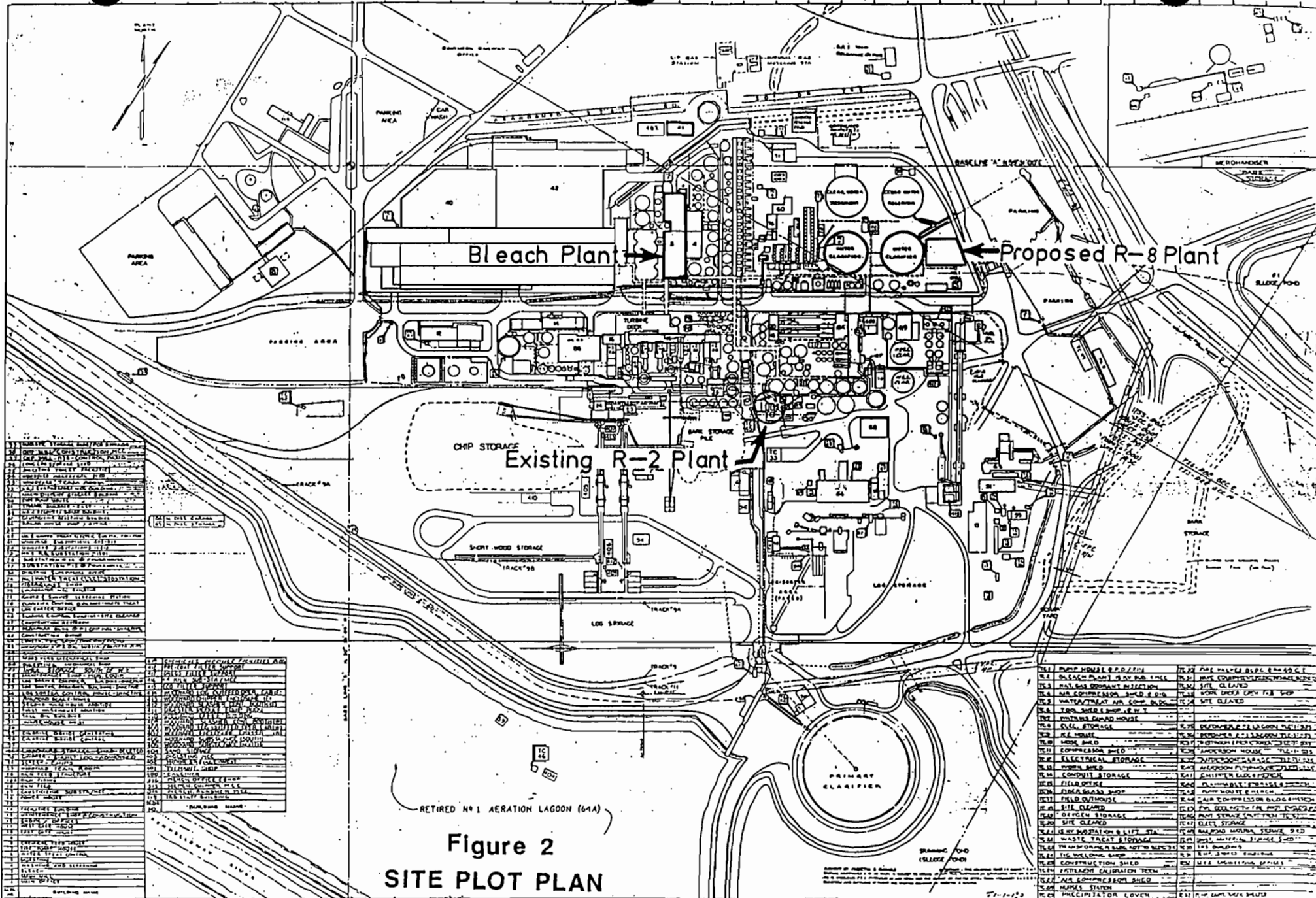


Figure 2
SITE PLOT PLAN

RETIRE NO. 1 AERATION LAGOON (61A)

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 | 49 | 50 | 51 | 52 | 53 | 54 | 55 | 56 | 57 | 58 | 59 | 60 | 61 | 62 | 63 | 64 | 65 | 66 | 67 | 68 | 69 | 70 | 71 | 72 | 73 | 74 | 75 | 76 | 77 | 78 | 79 | 80 | 81 | 82 | 83 | 84 | 85 | 86 | 87 | 88 | 89 | 90 | 91 | 92 | 93 | 94 | 95 | 96 | 97 | 98 | 99 | 100 |
|---|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|-----|

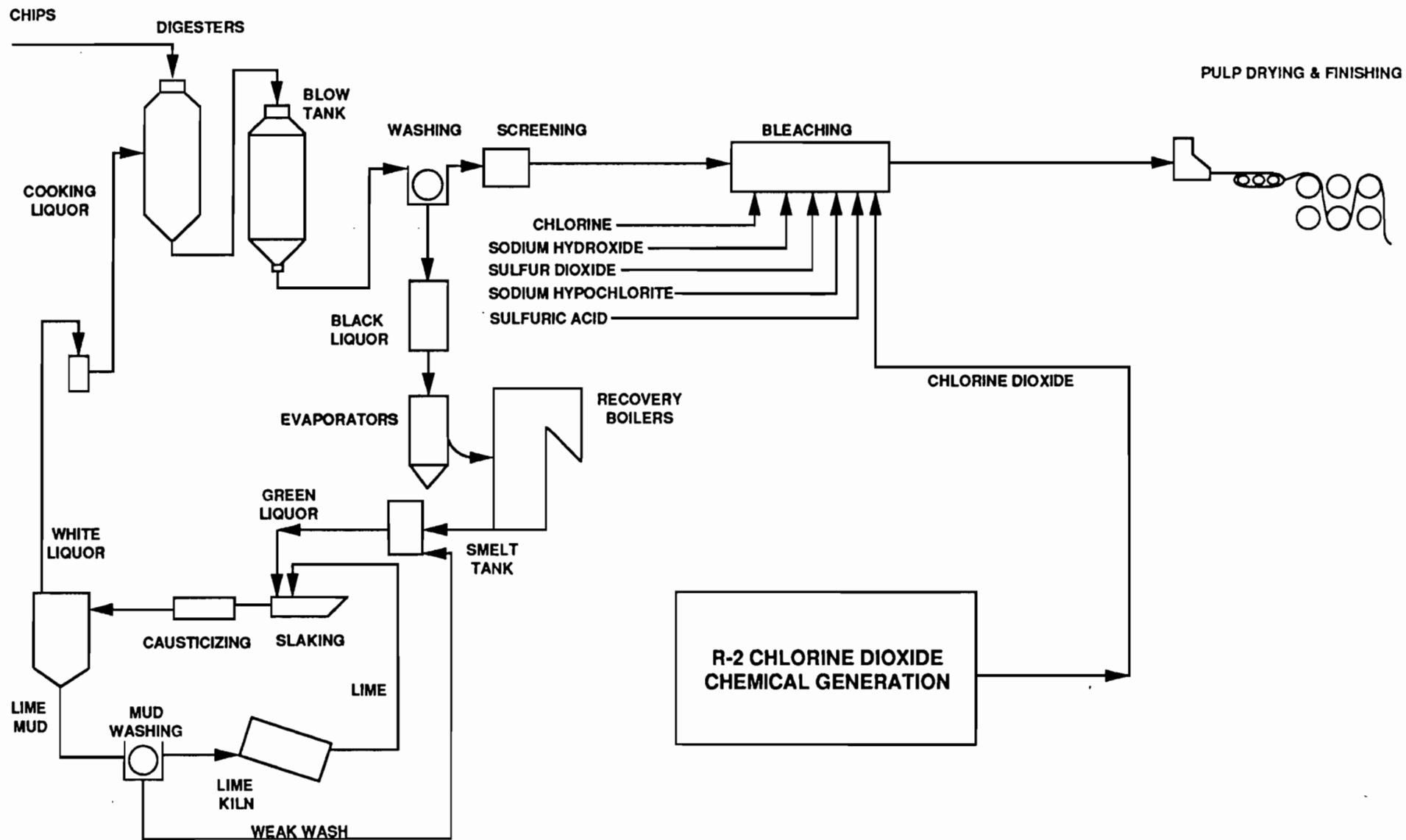
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 101 | 102 | 103 | 104 | 105 | 106 | 107 | 108 | 109 | 110 | 111 | 112 | 113 | 114 | 115 | 116 | 117 | 118 | 119 | 120 | 121 | 122 | 123 | 124 | 125 | 126 | 127 | 128 | 129 | 130 | 131 | 132 | 133 | 134 | 135 | 136 | 137 | 138 | 139 | 140 | 141 | 142 | 143 | 144 | 145 | 146 | 147 | 148 | 149 | 150 | 151 | 152 | 153 | 154 | 155 | 156 | 157 | 158 | 159 | 160 | 161 | 162 | 163 | 164 | 165 | 166 | 167 | 168 | 169 | 170 | 171 | 172 | 173 | 174 | 175 | 176 | 177 | 178 | 179 | 180 | 181 | 182 | 183 | 184 | 185 | 186 | 187 | 188 | 189 | 190 | 191 | 192 | 193 | 194 | 195 | 196 | 197 | 198 | 199 | 200 |
|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|

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| 201 | 202 | 203 | 204 | 205 | 206 | 207 | 208 | 209 | 210 | 211 | 212 | 213 | 214 | 215 | 216 | 217 | 218 | 219 | 220 | 221 | 222 | 223 | 224 | 225 | 226 | 227 | 228 | 229 | 230 | 231 | 232 | 233 | 234 | 235 | 236 | 237 | 238 | 239 | 240 | 241 | 242 | 243 | 244 | 245 | 246 | 247 | 248 | 249 | 250 | 251 | 252 | 253 | 254 | 255 | 256 | 257 | 258 | 259 | 260 | 261 | 262 | 263 | 264 | 265 | 266 | 267 | 268 | 269 | 270 | 271 | 272 | 273 | 274 | 275 | 276 | 277 | 278 | 279 | 280 | 281 | 282 | 283 | 284 | 285 | 286 | 287 | 288 | 289 | 290 | 291 | 292 | 293 | 294 | 295 | 296 | 297 | 298 | 299 | 300 |
|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|

SCALE 1/4" = 1'-0"

T-1-1-13

**FIGURE 3
THE PROCTER AND GAMBLE CELLULOSE COMPANY
SIMPLIFIED EXISTING PROCESS FLOW DIAGRAM**



employing the R2 process which reacts sodium chlorate, sodium chloride and sulfuric acid to form a chlorine dioxide/chlorine gas mixture that is absorbed in chilled water. After being bleached, the pulp is dried on the paper machine and finished to customer specifications.

4. NO. 2 BLEACH PLANT MODIFICATION PROJECT DESCRIPTION

The existing No. 2 Bleach Plant which is primarily used to produce diaper-related pulp, currently utilizes a six-stage bleaching sequence, commonly referred to as CEHDED. The letters in this sequence indicate the following bleaching stages:

- C Chlorination
- E Caustic Extraction
- H Sodium Hypochlorite
- D Chlorine Dioxide

The C stage and its associated washer are vented to a wet scrubber (common to the No. 1 and No. 2 Bleach Plants), which utilizes an alkaline solution to capture residual chlorine. The scrubber effluent is then used in the sodium hypochlorite stage. The D stage towers are vented to wet scrubbers utilizing chilled water on a once through basis. The resultant scrubber effluent gravity flows to the top of the respective D stage towers for efficient utilization of the captured chlorine dioxide. The existing No. 2 Bleach Plant is illustrated in Figure 4.

After completion of the proposed modification, the No. 2 Bleach Plant will normally employ a DEDED sequence when producing diaper-related pulp. The existing chlorination towers will be replaced with a new D stage upflow/downflow tower, and the existing sodium hypochlorite stage will be by-passed. The new D1 stage tower will be equipped with a new chilled water scrubber. The scrubbers on the existing D2 and D3 stage towers will be replaced with more efficient chilled water scrubbers. A new alkaline scrubber will be installed to control emissions from washers and seal pots. Modifications to the No. 2 Bleach Plant also include ancillary pumps, piping, instrumentation, etc. required to produce bleached pulp with the new sequence. The proposed No. 2 Bleach Plant flow diagram (DEDED sequence) is included as Figure 5.

FIGURE 4
THE PROCTER & GAMBLE CELLULOSE COMPANY
EXISTING NO. 2 BLEACH PLANT FLOW DIAGRAM

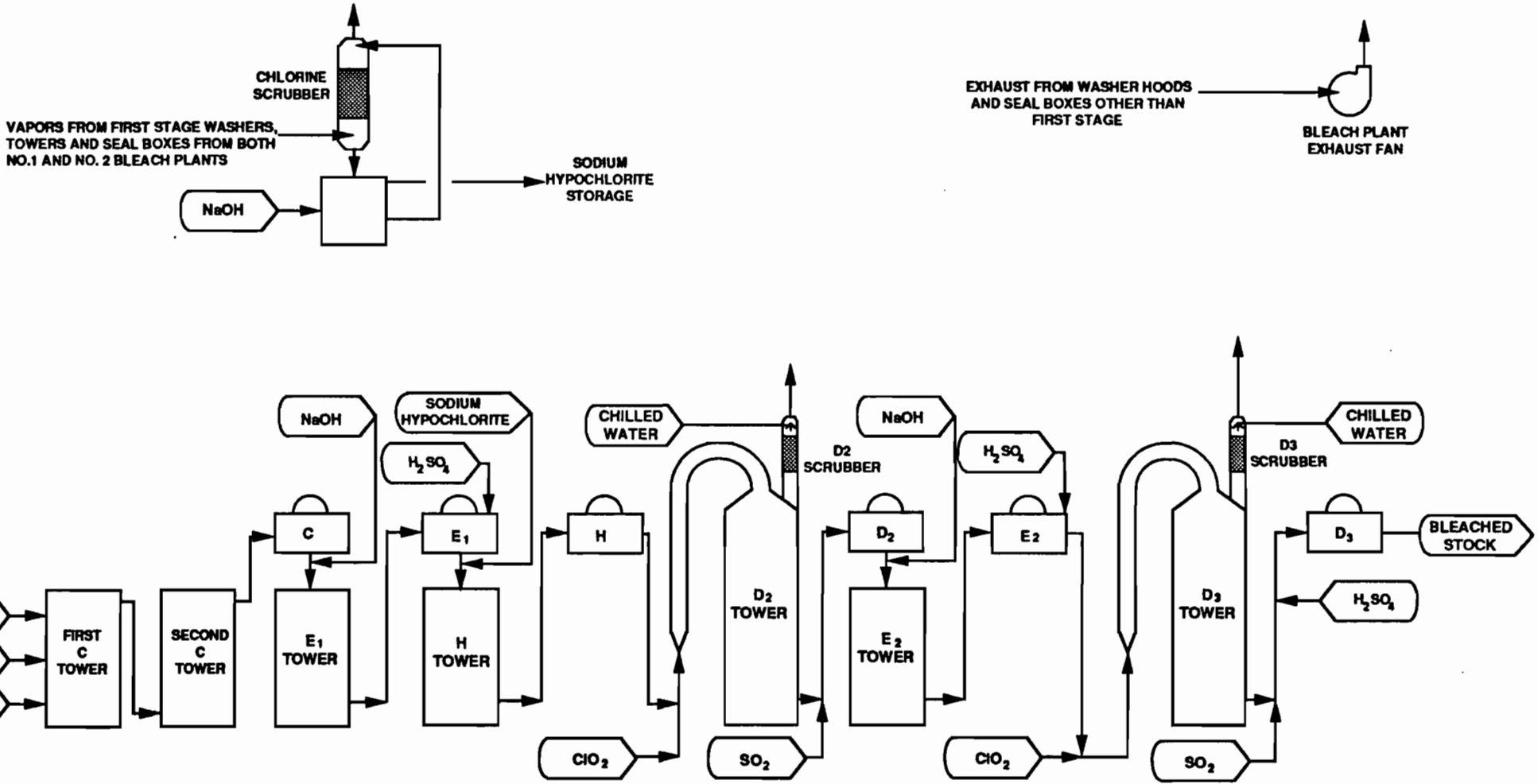
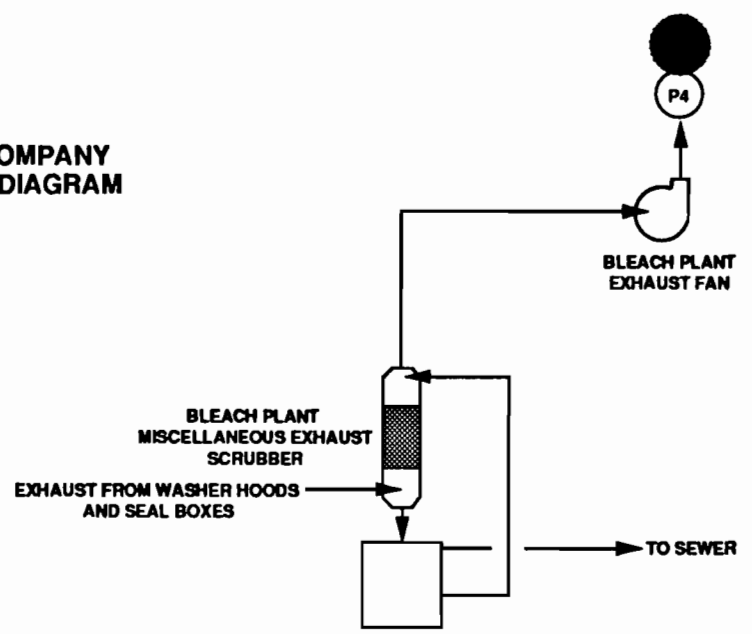
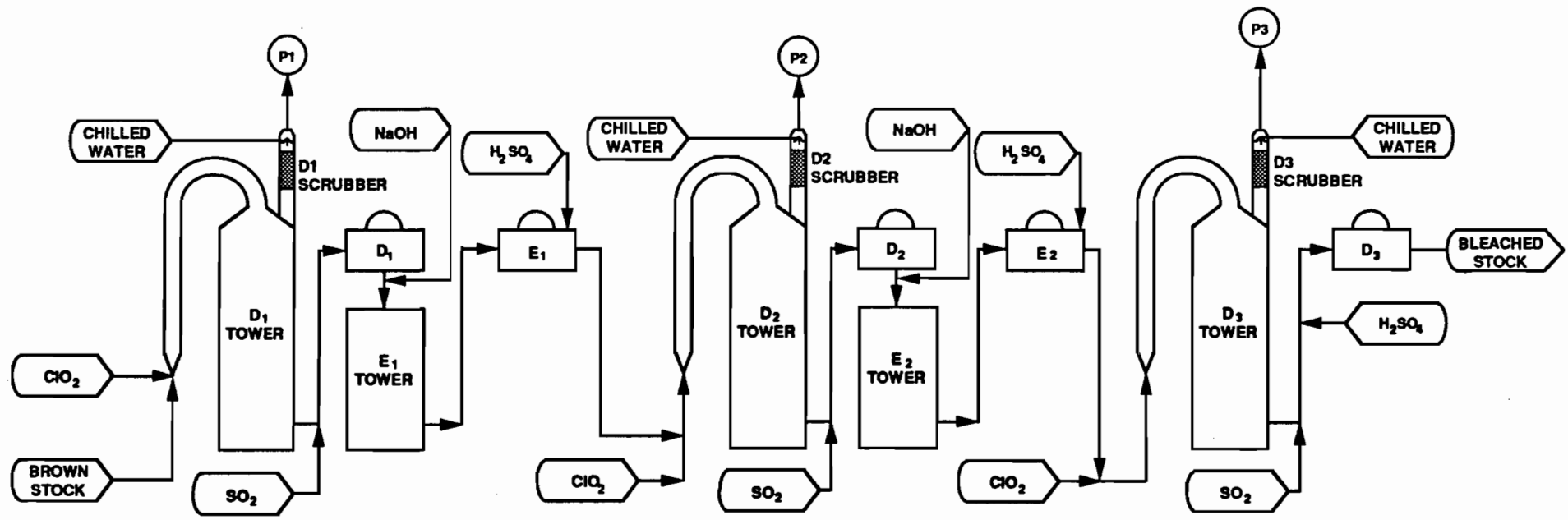


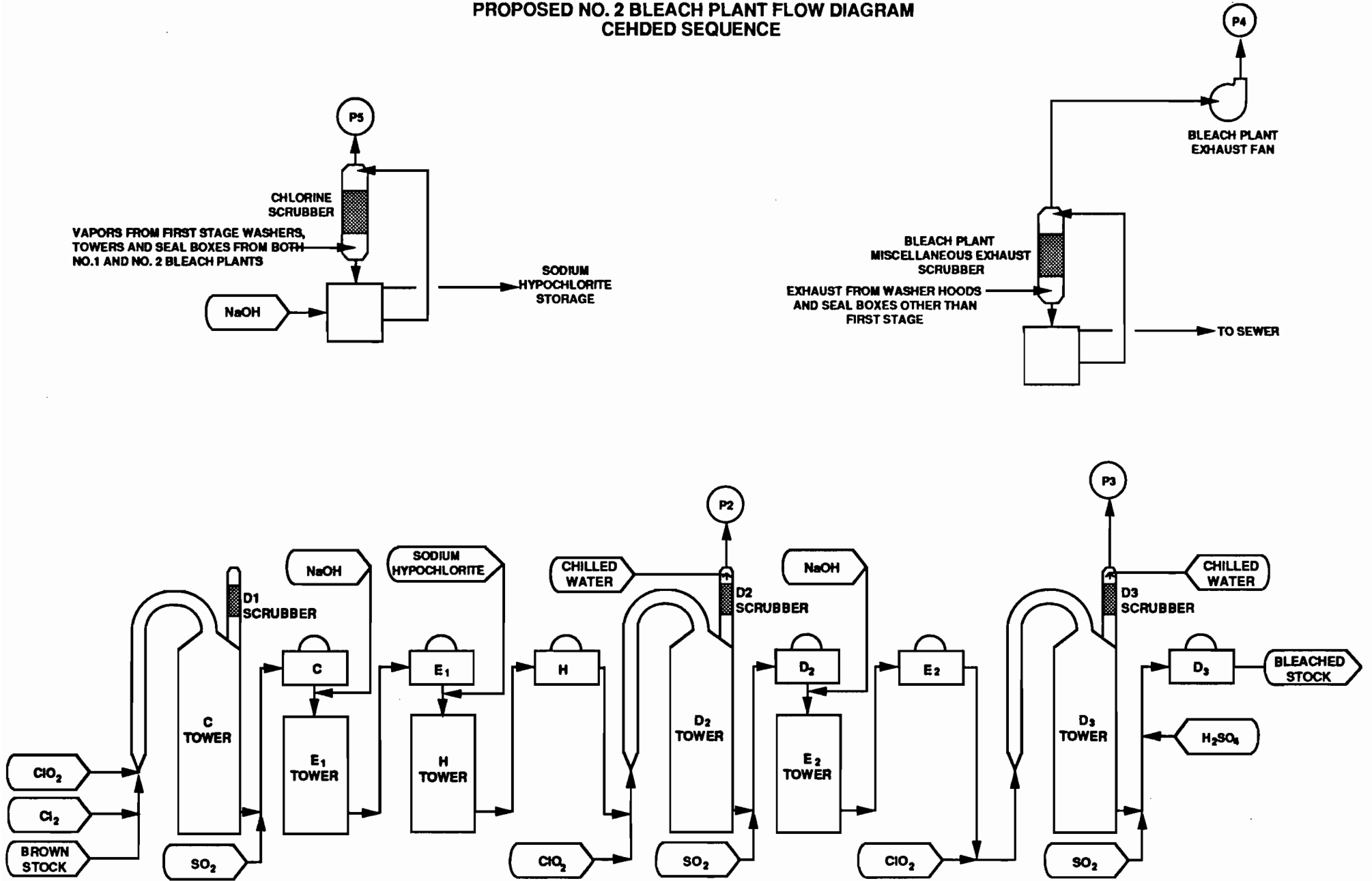
FIGURE 5
 THE PROCTER & GAMBLE CELLULOSE COMPANY
 PROPOSED NO. 2 BLEACH PLANT FLOW DIAGRAM
 DEDED SEQUENCE



Note: D1 stage washer and seal box vented to Bleach Plant Miscellaneous Exhaust Scrubber during DEDED sequence.

The No. 2 Bleach Plant, however, will maintain the ability to utilize the existing sodium hypochlorite stage and to supply chlorine to the first stage to produce dissolving grade pulps in the event that market conditions warrant. As a result, provisions will remain to scrub the first stage with an alkaline solution to remove chlorine. Figure 6 shows the basic flow diagram for the proposed No. 2 Bleach Plant when operating the CEHDED sequence.

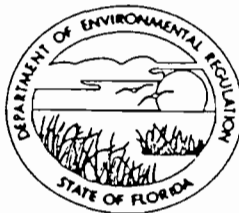
FIGURE 6
 THE PROCTER & GAMBLE CELLULOSE COMPANY
 PROPOSED NO. 2 BLEACH PLANT FLOW DIAGRAM
 CEHDED SEQUENCE



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

600pa. 5.
11-1-89
Recpt. # 119070

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



AC 62-172092

BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Kraft Pulp & Paper [] New¹ [X] Existing¹

APPLICATION TYPE: [X] Construction [] Operation [] Modification

COMPANY NAME: The Procter & Gamble Cellulose Company COUNTY: Taylor

Identify the specific emission point source(s) addressed in this application (i.e. Lime
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) No. 2 Bleach Plant

SOURCE LOCATION: Street 5 to 6 miles southeast of Perry City Perry

UTM: East 256,740 North 3,328,700

Latitude 30° 03' 59" N Longitude 83° 33' 12" W

APPLICANT NAME AND TITLE: C.S. Aiken, Plant Manager

APPLICANT ADDRESS: Route 3 Box 260, Perry, Florida 32347

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of The Procter & Gamble Cellulose Company

I certify that the statements made in this application for a construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization
Previously submitted

Signed: C.S. Aiken

C.S. Aiken, Plant Manager
Name and Title (Please Type)

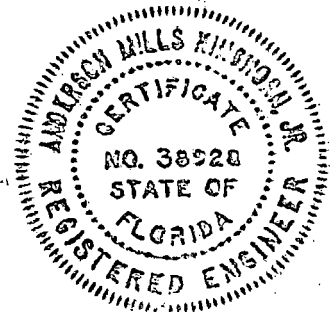
Date: 10/26/89 Telephone No. (904) 584-0121

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed *A.M. Kinghorn*

 Mr. A.M. Kinghorn

 Name (Please Type)
 Sirrine Environmental Consultants

 Company Name (Please Type)
 Post Office Box 24000, Greenville, SC 29616

 Mailing Address (Please Type)

Florida Registration No 0038928 Date: 10-31-89 Telephone No. (803) 234-3004

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

See Sections 1, 2 and 4 of this report.

B. Schedule of project covered in this application (Construction Permit Application Only)
 Start of Construction January 1990 Completion of Construction March 1991

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Total Project: \$20,000,000

 Total Air Pollution Control: \$ 225,000

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

#A062-2383, Issued: May 19, 1975, Expiration: Upon modification of bleach plant.
Existing permit includes both No. 1 and No. 2 Bleach Plants.

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? No
 - a. If yes, has "offset" been applied? N/A
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? N/A
 - c. If yes, list non-attainment pollutants. N/A
 2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. No
 3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. No
 4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? No
 5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? No
- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? No
- a. If yes, for what pollutants? N/A
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

Raw Materials and Chemicals Used in your Process, if applicable:

SEE ATTACHED TABLE IIIA

| Description | Contaminants | | Utilization Rate - lbs/hr | Relate to Flow Diagram |
|-------------|--------------|------|---------------------------|------------------------|
| | Type | % Wt | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 660 unbleached bone dry tons/day CEDED
900 unbleached bone dry tons/day DEDED

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

| Name of Contaminant | Emission ¹ | | Allowed ² Emission ² Rate per Rule 17-2 | Allowable ³ Emission lbs/hr | Potential ⁴ Emission | | Relate to Flow Diagram Figures 5&6 |
|---------------------|-----------------------|-------------|---|--|---------------------------------|------|------------------------------------|
| | Maximum lbs/hr | Actual T/yr | | | lbs/yr | T/yr | |
| Cl ₂ | * | * | N/A | N/A | * | * | P5 |
| ClO ₂ | * | * | N/A | N/A | * | * | P1,P2,P3,P4 |
| CHCl ₃ | * | * | N/A | N/A | * | * | P4 |
| | | | | | | | |
| | | | | | | | |

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

*Information is not available to reliably predict actual emissions of these chemicals. Attachment I presents a process to measure and evaluate these emissions.

TABLE III A
RAW MATERIALS AND CHEMICALS USED

| Description | Contaminants | | Utilization Rates | |
|--------------------------------|-----------------|------|-------------------|---------------|
| | Type | %wt | lbs/hr | |
| | | | <u>DEDED</u> | <u>CEHDED</u> |
| Unbleached Pulp (Bone Dry) | N/A | N/A | 75,000 | 55,000 |
| ClO ₂ | Cl ₂ | .04% | 3,570 | 310 |
| Cl ₂ | N/A | N/A | 0 | 4,280 |
| NaOH | N/A | N/A | 2,450 | 3,900 |
| NaOCl | N/A | N/A | 0 | 2,910 |
| H ₂ SO ₄ | N/A | N/A | 1,600 | 1,170 |
| SO ₂ | N/A | N/A | 220 | 200 |

D. Control Devices: (See Section V, Item 4)

| Name and Type (Model & Serial No.) | Contaminant | Efficiency | Range of Particles Size Collected (in microns) (If applicable) | Basis for Efficiency (Section V Item 5) |
|--|------------------|------------|---|--|
| D1 ClO ₂ Scrubber | ClO ₂ | * | N/A | * |
| D2 ClO ₂ Scrubber | ClO ₂ | * | N/A | * |
| D3 ClO ₂ Scrubber | ClO ₂ | * | N/A | * |
| Bleach Plant Misc. Exhaust Scrubber | ClO ₂ | * | N/A | * |
| Chlorine Scrubber (CEHDED only) | Cl ₂ | * | N/A | * |
| | | | | |

E. Fuels N/A *Equipment Specifications will be added at a later date.

| Type (Be Specific) | Consumption* | | Maximum Heat Input (MMBTU/hr) |
|--------------------|--------------|---------|----------------------------------|
| | avg/hr | max./hr | |
| | | | |
| | | | |
| | | | |
| | | | |

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis: N/A

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Filtrate from the D₁, D₂, and D₃ stage washers flows to the acid sewer for treatment
in the wastewater treatment plant. Extraction stage filtrate flows to the alkaline
sewer. When running the CEHDED sequence, the sodium hypochlorite stage filtrate also

flows to the alkaline sewer, and the spent filtrate from the chlorination stage flows
to the acid sewer. These sewers are treated in the wastewater treatment plant.

DER Form 17-1.202(1)

Effective November 30, 1982

Page 5 of 12

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

This information will be provided following detailed design of the scrubbers.

Stack Height: _____ ft. Stack Diameter: _____ ft.
 Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.
 Water Vapor Content: _____ % Velocity: _____ FPS

N/A

SECTION IV: INCINERATOR INFORMATION

| Type of Waste | Type 0 (Plastics) | Type I (Rubbish) | Type II (Refuse) | Type III (Garbage) | Type IV (Pathological) | Type V (Liq. & Gas By-prod.) | Type VI (Solid By-prod.) |
|--------------------------|-------------------|------------------|------------------|--------------------|------------------------|------------------------------|--------------------------|
| Actual lb/hr Incinerated | | | | | | | |
| Uncontrolled (lbs/hr) | | | | | | | |

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

| | Volume (ft) ³ | Heat Release (BTU/hr) | Fuel | | Temperature (°F) |
|-------------------|--------------------------|-----------------------|------|--------|------------------|
| | | | Type | BTU/hr | |
| Primary Chamber | | | | | |
| Secondary Chamber | | | | | |

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

N/A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

N/A

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
N/A
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
Refer to Attachment 1
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
Refer to Attachment 1
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
This information will be provided following detailed design of scrubbers.
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
This information will be provided following detailed design of scrubbers.
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
Refer to Figure 3
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
Refer Figure 1
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.
Refer to Figure 2

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

N/A

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant

Rate or Concentration

| Contaminant | Rate or Concentration |
|-------------|-----------------------|
| | |
| | |
| | |

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant

Rate or Concentration

| Contaminant | Rate or Concentration |
|-------------|-----------------------|
| | |
| | |
| | |

C. What emission levels do you propose as best available control technology?

N/A

Contaminant

Rate or Concentration

| Contaminant | Rate or Concentration |
|-------------|-----------------------|
| | |
| | |
| | |

D. Describe the existing control and treatment technology (if any).

N/A

- 1. Control Device/System:
- 2. Operating Principles:
- 3. Efficiency:*
- 4. Capital Costs:

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

| Contaminant | Rate or Concentration |
|-------------|-----------------------|
| | |
| | |
| | |
| | |

10. Stack Parameters

- a. Height: ft.
- b. Diameter: ft.
- c. Flow Rate: ACFM
- d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected: N/A

1. Control Device:

2. Efficiency:¹

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:²

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

| | |
|--|--|
| | |
| | |
| | |

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

| | |
|--|--|
| | |
| | |
| | |

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

N/A

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? Yes No
- b. Was instrumentation calibrated in accordance with Department procedures?
 Yes No Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
- 2. Surface data obtained from (location) _____
- 3. Upper air (mixing height) data obtained from (location) _____
- 4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

- 1. _____ Modified? If yes, attach description.
- 2. _____ Modified? If yes, attach description.
- 3. _____ Modified? If yes, attach description.
- 4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

Applicants Maximum Allowable Emission Data

| Pollutant | Emission Rate |
|-----------------|-----------------|
| TSP | _____ grams/sec |
| SO ² | _____ grams/sec |

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

- F. Attach all other information supportive to the PSD review.
- G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.
- H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

**#2 Bleach Plant Modifications and
Chlorine Dioxide Generation Process
Replacement Project**

Proposed Permitting Strategy

- 1) Approve the enclosed air construction permit applications for the proposed #2 Bleach Plant modifications and the Chlorine Dioxide generation process replacement project, which includes identified emissions control equipment.
- 2) As a condition in the construction permits, include the following requirements:
 - A. Within three months following construction completion, start-up, and achievement of reliable operations, emissions of chlorine, chlorine dioxide, and chloroform will be measured, using testing methods agreed upon by the FDER and the permittee, at the appropriate points in the #2 Bleach Plant and the R-8 Chlorine Dioxide Generation Process:
 - B. Within one month following receipt of the measurements in Item A, the measured emissions will be subjected to initial air toxics screening using criteria agreed to by the FDER and the permittee.
 - C. The screening results will be used to consider whether:
 - 1) The achieved emissions levels are acceptable; or
 - 2) Additional control measures needed to meet the initial screening criteria are available and practical; or
 - 3) Detailed risk assessments are necessary to ensure that the practically achievable emissions are acceptable.
 - D. For any pollutant addressed in this permit that fails to meet the criteria identified in Item B, the permittee shall submit within six months following receipt of screening results, a plan and schedule to the FDER which addresses the factors identified in Item C. The plan may include a recommendation to install additional control measures/process modifications, if needed and available and practical, or a recommendation to develop a risk assessment to demonstrate that the practically achievable emissions are acceptable.
 - E. Air operation permits will not be granted for the #2 Bleach Plant and the Chlorine Dioxide generation process until the plan identified in Item D is approved by the FDER and completed.

If additional time is needed to complete the steps identified in the plan, the construction permit will be extended accordingly.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

May 17, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. S. Aiken, Plant Manager
The Procter & Gamble Cellulose Company
Rt. 3, Box 260
Perry, Florida 32347-9512

Bruce
123001

Dear Mr. Aiken:

Re: Construction Permit Amendment Request
No. 1 Bark Boiler: AC 62-141927

The Department has considered the April 17, 1990 letter from Mr. Ray Andreu, with P&GCC, and the information shared in a meeting held here with representatives of your facility. The results of the discussions are as follows:

1. Based on Mr. C. H. Fancy's letter dated April 5, 1990, the Department will not require annual TRS compliance tests beyond the initial compliance test. However, the Department reserves the right to require compliance testing for TRS for operation permit renewal. Therefore, the following will be changed:

- Specific Condition No. 8

FROM:

- a. Annual compliance tests for PM and visible emissions shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:
 - 1) EPA Method 5, Determination of Particulate Emissions from Stationary Sources
 - 2) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources
- b. Initial (and annual) compliance tests for SO₂ and TRS shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:

Mr. C. S. Aiken
Page 2
May 17, 1990

- 1) EPA Method 6, Determination of Sulfur Dioxide Emissions from Stationary Sources
- 2) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

Other EPA approved test methods may be used only after prior Department approval.

TO:

- a. Annual compliance tests for PM and visible emissions shall be conducted using the following test methods in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A:
 - 1) EPA Method 5, Determination of Particulate Emissions from Stationary Sources
 - 2) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources
- b. Initial (and annual) compliance tests for SO₂ shall be conducted using the following test method in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A:
 - 1) EPA Method 6, Determination of Sulfur Dioxide Emissions from Stationary Sources
- c. Compliance tests for TRS shall be conducted using one of the following test methods in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A:
 - 1) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources
- d. The Department reserves the right to require testing for TRS, in accordance with 8.c. above, for operation permit renewal.

Other test methods may be used only after prior Department approval.

Mr. C. S. Aiken
Page 3
May 17, 1990

2. Based on Mr. C. H. Fancy's letter dated April 5, 1990, the Department will require compliance demonstrated by continuous monitoring and recording of temperature showing a minimum of 1200°F as being achieved. Therefore, the following will be changed:

- Specific Condition No. 6

FROM:

A continuous temperature monitor shall be installed, calibrated and operated in accordance with FAC Rule 17-2.710.

TO:

A continuous temperature monitor shall be installed, calibrated and operated in accordance with F.A.C. Rule 17-2.710. Also, a continuous recorder for the temperature shall be installed, calibrated and operated properly.

3. Based on the pre- and post-tests for SO₂ required on the TRS gas combustion source, the net change was less than 40 TPY (actual net change was +0.9 TPY, based on 8760 hrs/yr), which exempted the source from PSD new source review pursuant to EPA memorandum 4.32 (attached). Therefore, the allowable SO₂ emissions will be revised to reflect the original permitted SO₂ level established by operation permit No. AO 62-126397 (i.e., 666.00 lbs/hr; 2917.1 TPY) plus 39.9 TPY (9.1 lbs/hr), and is as follows:

- Specific Condition No. 7

FROM:

The No. 1 Bark Boiler emissions shall not exceed:

- a) TRS: 5 ppmvd at standard conditions @ 10% O₂, 12-hr avg. (3.38 lbs/hr, 14.80 TPY)
- b) SO₂: 1449 lbs/hr, 6346 TPY
- c) PM:
 - wood waste fired: 47.3 lbs/hr, 207 TPY
 - fuel oil fired: 24.0 lbs/hr, 105 TPY
- d) VE: maximum of 30% opacity, except 40% for 2 mins/hr

Note: Fly ash and SO₂ are controlled by a wet scrubber with projected removal efficiencies of 93% and 40%, respectively. A cyclone collector system precedes the scrubber.

Mr. C. S. Aiken
Page 4
May 17, 1990

TO:

The No. 1 Bark Boiler emissions shall not exceed:

- a) TRS: 5 ppmvd at standard conditions @ 10% O₂, 12-hr avg. (3.38 lbs/hr, 14.80 TPY)
- b) SO₂: 675.1 lbs/hr, 2957 TPY
- c) PM: • wood waste fired: 47.3 lbs/hr, 207 TPY
• fuel oil fired: 24.0 lbs/hr, 105 TPY
- d) VE: maximum of 30% opacity, except 40% for 2 mins/hr

Note: Fly ash and SO₂ are controlled by a wet scrubber with projected removal efficiencies of 93% and 40%, respectively. A cyclone collector system precedes the scrubber.

- 4. The request for deleting the annual compliance test for SO₂ is denied for the reasons established in ASP-89-B-01, which was finalized on February 23, 1990. As long as the source is major for SO₂ on paper (see Specific Condition No. 7, as revised in #3 above) and unless the source is exempted under Rule 17-2.700(2), F.A.C., annual compliance tests for SO₂ will be required.
- 5. Since the company wants the No. 1 Bark Boiler to be subject to the standards of Rule 17-2.600(10), F.A.C., Carbonaceous Fuel Burning Equipment, the following will be added:

Specific Condition No. 20 (new)

Except for start-up, shut-down, or malfunction, the No. 1 Bark Boiler is not permitted to fire 100% fuel oil.

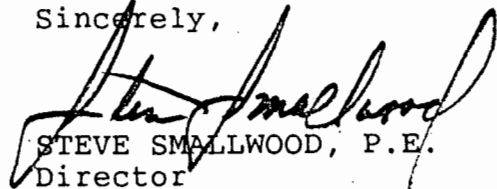
Attachments to be incorporated:

- 14. Department Order signed February 23, 1990, regarding OGC File No. 90-0191.
- 15. Mr. C. H. Fancy's letter dated April 5, 1990.
- 16. Mr. Ray Andreu's letter with attachments received April 17, 1990.

Mr. C. S. Aiken
Page 5
May 17, 1990

This letter must be attached to your air construction permit, No. AC 62-141927, and shall become a part of the permit.

Sincerely,



STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

SS/BM/plm

Attachments

c: R. Andreu, P&GCC
A. Kutyna, NE Dist.

ATTACHMENT 14

HELEN, FILE ASP-89-B-01

TO: JIM PENNINGTON
FROM: [unclear]
DATE: [unclear]
SUBJECT: [unclear]
S.C.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the matter of:)
)
PROCTER AND GAMBLE)
CELLULOSE COMPANY,)
)
Petitioner.)
_____)

OGC File No. 90-0191
Permit No. AC62-141927
ASP-89-B-01

ORDER DENYING REQUEST

FOR

ALTERNATE TEST PROCEDURES AND REQUIREMENTS

Pursuant to Rule 17-2.700(3), Florida Administrative Code, Procter and Gamble Cellulose, petitioner, submitted a request for approval of a waiver of compliance verification procedures for petitioner's No. 1 Bark Boiler, permit number AC62-141927, located in Taylor County.

Having considered petitioner's written request and all supporting documentation, the following Findings of Fact, Conclusions of Law, and Order are entered:

FINDINGS OF FACT

1. On September 18, 1989, petitioner specifically requested a waiver of annual testing requirements for total reduced sulfur (TRS) and sulfur dioxide (SO₂) emissions from the No. 1 Bark Boiler as specified in permit number AC62-141927, specific condition number 8b.

2. As justification for the waiver of the annual compliance test requirements, petitioner stated that "a requirement to repeat this activity [compliance verification process] on an annual basis would place a significant and unwarranted burden on [petitioner's] operation. This basic problem involves the fact that the compliance verification process requires the simultaneous operation of the various TRS sources at maximum permitted rates for extended periods of time."

3. Petitioner has requested the monitoring of surrogate parameters in lieu of EPA Methods 6 and 16 or 16A to prove continuous compliance. The proposed alternate test procedure would include:

- a. TRS incinerator retention time of .5 seconds at 1,200°F;
- b. Continuous temperature monitoring; and
- c. Fuel oil analyses.

4. The proposed surrogate parameters would not give an accurate representation of the TRS and SO₂ emissions from the source and would be inconsistent with the emissions testing procedure required of other similar sources in the State.

5. The absence of stack sampling data would preclude valid compliance determinations.

CONCLUSIONS OF LAW

1. The Department has jurisdiction to consider petitioner's request pursuant to Section 403.061, Florida Statutes, and Rule 17-2.700(3), Florida Administrative Code.

2. Petitioner has not demonstrated that the proposed alternate compliance verification method would be adequate to verify the compliance of the unit with the TRS and SO₂ emission limiting standards.

ORDER

Having considered petitioner's written request and supporting documentation, it is hereby ordered that:

1. The relief requested by petitioner is denied;
2. Petitioner shall conduct the appropriate stack sampling tests using the procedures specified in Rule 17-2.700; and
3. Petitioner shall submit the test results to the Deputy Assistant Secretary for the Northeast District prior to September 30, 1990.

RIGHT TO APPEAL

Any party to this Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date the Notice of Agency Action is filed with the Clerk of the Department.

PETITION FOR ADMINISTRATIVE REVIEW

1. A person whose substantial interests are affected by the Department's decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 21 days of receipt of this Order. Petitioner shall mail a copy of the petition to the applicant at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

2. The petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, and the Department File Number;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

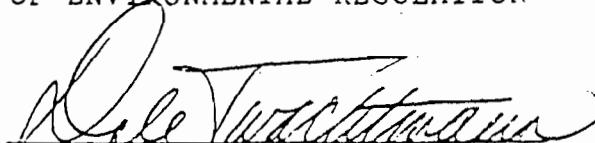
3. If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Order. Persons whose substantial interests will be affected by any decision of the Department with regard to the applicant have the right to petition to become a party to the proceeding. The petition must conform with the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

4. This Order constitutes final agency action unless a

petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070. F.A.C. Upon timely filing of a petition or a request for an extension of time this Order will not be effective until further Order of the Department.

DONE AND ORDERED this 23 day of Feb, 1990 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



DALE TWACHTMANN
Secretary
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida
32399-2400

(904) 488-4805

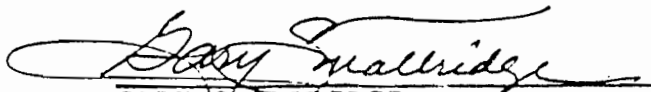
FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to S120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 2-23-90
Clerk Date

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Order has been mailed, postage prepaid, to Ray Andreu, The Procter and Gamble Cellulose Company, Rt. 3 Box 260, Perry, Florida 32347-9512 this 26TH day of FEBRUARY, 1990.



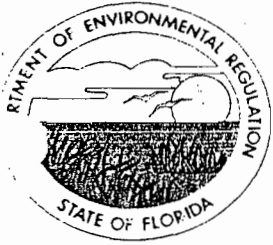
GARY SMALLRIDGE
Assistant General Counsel

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-1400

Telephone (904) 488-9730

ATTACHMENT 15



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

April 5, 1990

Mr. Ray Andreu, Chairman
Florida Pulp and Paper Association
Technical and Environmental Committee
Route 3, Box 260
Perry, Florida 32347

Dear Mr. Andreu:

This is to confirm the agreements made by the Florida Pulp and Paper Association and the Bureau of Air Regulation at our meeting on March 20, 1990, regarding incineration of TRS gases in an incinerator(s).

1. Any company using an incinerator will initially test to show compliance with the 5 ppmvd limit, corrected to 10% oxygen using DER approved test methods.
2. These tests will not be required annually. The Department reserves the right to require testing for operation permit renewal (every 5 years).
3. Compliance during the five year period will be demonstrated by continuous monitoring and recording of the temperature showing that a minimum temperature of 1200°F is being achieved.
4. By the selected design and the P.E. of record, the construction permit applications shall contain calculations to insure that the specified retention time (i.e., 0.5 seconds) will be achieved by the source in order to provide reasonable assurance to the Department.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/kt

ATTACHMENT 16



PROCTER & GAMBLE
CELLULOSE

RECEIVED

APR 19 1990
THE PROCTER & GAMBLE CELLULOSE COMPANY
P.O. BOX 260
PERRY, FLORIDA 32077
PHONE (904) 231-1111
DER - BAQM

April 17, 1990

Mr. Bruce Mitchell
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
2600 Blair stone Road
Tallahassee, FL 32399-2400

Re: The Procter & Gamble Cellulose Company
#1 Bark Boiler Construction Permit (AC62-141927) Modification
Regarding Annual Testing Requirements

Dear Mr. Mitchell:

This is to request that the Department proceed with a modification of the #1 bark boiler permit referenced above, based on the recent agreement made by the Florida Pulp & Paper Association and the Bureau of Air Regulation (see Attachment A - letter from Mr. C. H. Fancy dated 4/5/90), regarding the annual testing requirement for TRS.

Based on this recent development, we would also like the Department to reconsider our previous request for a waiver of the annual compliance test requirement for SO₂ for our #1 bark boiler. In regard to SO₂, we believe that we have adequately fulfilled the steps outlined in Mr. Fancy's 4/5/90 letter. As such, the same principles should apply to SO₂. Attachment B, which is a copy of our previous test waiver request, is provided to support our request relating to SO₂. This document also contains the TRS incineration retention time information that was referenced in Mr. Fancy's letter, for incorporation into the construction permit.

In order to effect the above requests, we believe that the only action necessary is to delete the words "and annual" from specific condition #8.b. Attachment C is a copy of page 7 of 9 from the existing construction permit, which highlights the requested change.

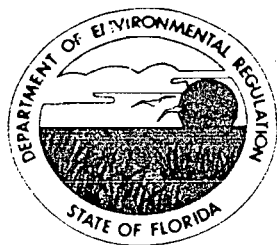
If you have any questions or require additional information, please call me at (904) 584-0347.

Very truly yours,

THE PROCTER & GAMBLE CELLULOSE COMPANY

R. Andreu
Environmental Control Manager

RA:msw
#1BB
Attachments



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

April 5, 1990

Mr. Ray Andreu, Chairman
 Florida Pulp and Paper Association
 Technical and Environmental Committee
 Route 3, Box 260
 Perry, Florida 32347

Dear Mr. Andreu:

This is to confirm the agreements made by the Florida Pulp and Paper Association and the Bureau of Air Regulation at our meeting on March 20, 1990, regarding incineration of TRS gases in an incinerator(s).

1. Any company using an incinerator will initially test to show compliance with the 5 ppmvd limit, corrected to 10% oxygen, using DER approved test methods.
2. These tests will not be required annually. The Department reserves the right to require testing for operation permit renewal (every 5 years).
3. Compliance during the five year period will be demonstrated by continuous monitoring and recording of the temperature showing that a minimum temperature of 1200°F is being achieved.
4. By the selected design and the P.E. of record, the construction permit applications shall contain calculations to insure that the specified retention time (i.e., 0.5 seconds) will be achieved by the source in order to provide reasonable assurance to the Department.

Sincerely,

C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/kt



THE PROCTER & GAMBLE CELLULOSE CO.
RT. 3, BOX 200
PEERY, FLORIDA 32347-9512
PHONE: (904) 554-0121

August 28, 1989

Mr. Clair Fancy, Deputy Chief
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Alternate Procedure Request - (Waiver of Compliance Test Requirement)

Dear Mr. Fancy:

This is to request approval for an alternate procedure under 17-2.700(3), FAC. Specifically, we are requesting a waiver of the annual compliance test requirement for TRS and SO₂ for our #1 bark boiler (AC62-141927) as allowed under Rule 17-2.700(2)(c)1.

As you are probably aware, the #1 bark boiler serves as the control device (incinerator) for various TRS sources within our facility. During the recent #1 bark boiler compliance verification process it became clearly evident that a requirement to repeat this activity on an annual basis would place a significant and unwarranted burden on our operation. This basic problem involves the fact that the compliance verification process requires the simultaneous operation of the various TRS sources at maximum permitted rates for extended periods of time. Due to the independent nature of each of our process areas, the compliance verification process would require an extraordinary coordination effort that would, likely, interfere with the normal operation of the plant.

Other factors in support of our request for a waiver of the annual compliance test requirement are as follows:

- 1) The results of the recent #1 bark boiler compliance verification process showed that the TRS and SO₂ emissions were significantly lower than allowable levels. In fact, TRS emissions were 21% and SO₂ emissions were 0.08% of the allowable emissions.
- 2) The minimum incineration conditions that were incorporated into our original construction permit (specific condition #5) require TRS gases to be incinerated for 0.5 seconds and at 1200°F. Even under worst case conditions, our incineration process is far better than the minimum specifications for incineration (see Attachment I).

- 3) The original construction permit (specific condition #6) required the installation, calibration, and operation of a continuous temperature monitor. We are currently monitoring incineration conditions on a continuous basis. As the compliance verification results showed, continuous temperature monitoring is a sound surrogate parameter for TRS. We are also required to submit quarterly continuous emission monitoring reports.
- 4) As far as SO₂ is concerned, the use of #6 fuel oil in the #1 bark boiler is well below the 400 hours per year criteria provided for in Rule 17-2.700(2)(a)3.b., which provides a testing exemption for sources in this category. In addition, we are already required to monitor and provide assurance on the use of fuel oil with less than 2.5% sulfur content.

As a result of the above points, our contention is that appropriate surrogate parameters (continuous temperature monitoring, fuel oil analyses submittals, etc.) already exist and, as such, an annual compliance testing requirement is unwarranted.

We appreciate your consideration of this request. If you have any questions or require additional information, please call me at (904) 584-0347.

Very truly yours,

THE PROCTER & GAMBLE CELLULOSE COMPANY



R. Andreu
Environmental Control Manager

RA:msw
AltReq
Attachment

TRS CONTROL

FROM: Steve McDonald

DATE: 1/30/89

TO: Jim Farmer

R/L: 1/90

SUBJECT: GAS RESIDENCE TIME IN NO. 1 BARK BOILER ABOVE 1200 F

Evaluation of the suitability of the No. 1 Bark Boiler for noncondensable gas incineration, completed during the definition phase of the TRS Control Project, included calculation of gas residence time in the furnace above 1200 degrees F under worst case conditions. The results are summarized below.

1. Based on temperature profile data collected at a steaming rate of 200,000 lbs/hr, flue gas temperature falls to 1200 F at a point approximately 11 feet into the convection section. Up to this point, temperatures are above 1200 F, with temperatures in the combustion zone above the grate reaching 3000 F.
2. At the flue gas flow corresponding to the 200,000 lbs/hr steaming rate, the residence time in the furnace and through the first 11 feet of the convection section is 1.15 seconds.
3. The average temperature in the furnace between the grate level, which is the area of injection of the noncondensable gases, and the point where the temperature drops to 1200 F is approximately 2500 F.

Please give me a call if you have any questions on this data.



S. W. McDonald

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141927
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The maximum heat input rate shall not exceed 300 MMBtu/hr from any combination of the fuels wood waste, No. 6 fuel oil and TRS gases. Projected wood waste utilization rate is 23.5 tons per hour (30% moisture).

4. The No. 6 fuel oil utilization rate shall not exceed 1644 gals/hr (240 MMBtu/hr). The sulfur content of the fuel oil shall not exceed 2.5% by weight.

5. TRS gases from the Nos. 1, 2, 3, and 4 MEE Systems and the Nos. 1 and 2 Batch Digesting Systems shall be collected and transported to and incinerated in the No. 1 Bark Boiler for a minimum of 0.5 seconds and 1200 °F.

6. A continuous temperature monitor shall be installed, calibrated and operated in accordance with FAC Rule 17-2.710.

7. The No. 1 Bark Boiler emissions shall not exceed:

- a) TRS: 5 ppmvd at standard conditions @ 10% O₂, 12-hr avg.
(3.38 lbs/hr, 14.80 TPY)
- b) SO₂: 1449 lbs/hr, 6346 TPY
- c) PM: o wood waste fired: 47.3 lbs/hr, 207 TPY
o fuel oil fired: 24.0 lbs/hr, 105 TPY
- d) VE : maximum of 30% opacity, except 40% for 2 mins/hr

Note: Fly ash and SO₂ are controlled by a wet scrubber with projected removal efficiencies of 93% and 40%, respectively. A cyclone collector system precedes the scrubber.

8.a. Annual compliance tests for PM and visible emissions shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:

- 1) EPA Method 5, Determination of Particulate Emissions from Stationary Sources
- 2) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources

* b. Initial (~~and annual~~) compliance tests for SO₂ and TRS shall be conducted using the following test methods in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

- 1) EPA Method 6, Determination of Sulfur Dioxide Emissions from Stationary Sources
- 2) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

Other EPA approved test methods may be used only after prior Departmental approval.