

**INTERNATIONAL  PAPER**

PENSACOLA MILL  
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**RECEIVED**

APR 22 2003

BUREAU OF AIR REGULATION

April 21, 2003

Mr. Bruce Mitchell  
Florida Department of Environmental Protection  
Division of Air Resource Management  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400

**RE: Air construction permit application for International Paper's Pensacola Mill**

Dear Mr. Mitchell:

The purpose of this letter is to formally submit an Air Construction Permit Application for Phase I of the Mill Viability Project at International Paper's (IP) Pensacola Mill. Two Copies of the permit application are enclosed.

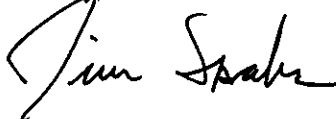
The permit application addresses the following modifications:

- Installation of a new causticizer body and support piping. After completion of the Phase II activities, the addition of the new causticizer body in conjunction with changes to the Lime Slaker will enable the Mill to meet the future white liquor requirements to support the additional 150 ADBT/day.
- Installation of "diagonal" extraction screens in the continuous digester for improved downflow cooking.
- Replacement of two (2) medium consistency (MC) pumps in the Pine O<sub>2</sub> Delignification and bleach plant area. After completion of the Phase II activities, when three (3) additional MC pumps will be replaced, the new MC pumps will enable the Mill to meet the additional 150 ADBT/day.

IP's goal is to complete these modifications during the October 2003 Outage. The enclosed construction permit application for these modifications was prepared pursuant to 62-212.400(2)(d)4.b. (FAC) and is viewed as a "modification to a minor facility". During this phase of the permitting, IP will maintain the federally enforceable production limits currently affecting the emissions units and provide calculations demonstrating that the emission increase associated with these modifications will be below the applicable PSD significance emission rates; thus qualifying as a "modifications to minor facilities".

If you have any questions or require any additional information please contact me at 850-968-2121 x3833.

Sincerely,



Jim Spahr  
Sr. Environmental Engineer

Enclosure: 2

Cc: Sandra Veazey, FDEP Northwest District

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**WASTE WATER  
TREATMENT SYSTEM  
MILL VIABILITY  
PROJECT**

**RECEIVED**

APR 22 2003

BUREAU OF AIR REGULATION

**Air Construction Permit –  
Phase I Application**

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Submitted By:

**INTERNATIONAL PAPER  
COMPANY  
PENSACOLA MILL  
375 Muscogee Road  
Cantonment, FL 32533-0087  
Escambia County**

INTERNATIONAL  PAPER

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## 1. INTRODUCTION AND APPLICATION ORGANIZATION

International Paper Company (IP) owns and operates a Kraft pulp and paper mill in Cantonment, Florida (Pensacola Mill or Mill). The IP Mill is a major source as defined by the federal operating permit program (40 CFR Part 70) and the federal new source review (NSR) program (40 CFR Part 52). In addition, the IP Mill is also subject to the Florida Title V Permit Regulations and New Source Review Regulations, Chapter 62-213 and Chapter 62-212, respectively. As a result, the Pensacola Mill is required to submit this air construction permit application to modify several emission units at the Mill. This document contains the required information and permit application forms for the IP Pensacola Mill to obtain an air construction permit to modify several emission units at the Mill. The information contained herein has been developed to meet the completeness and accuracy requirements of both the State and Federal programs. The application has also been carefully presented to facilitate the application review process and development of the air construction permit.

### 1.1 GENERAL FACILITY DESCRIPTION

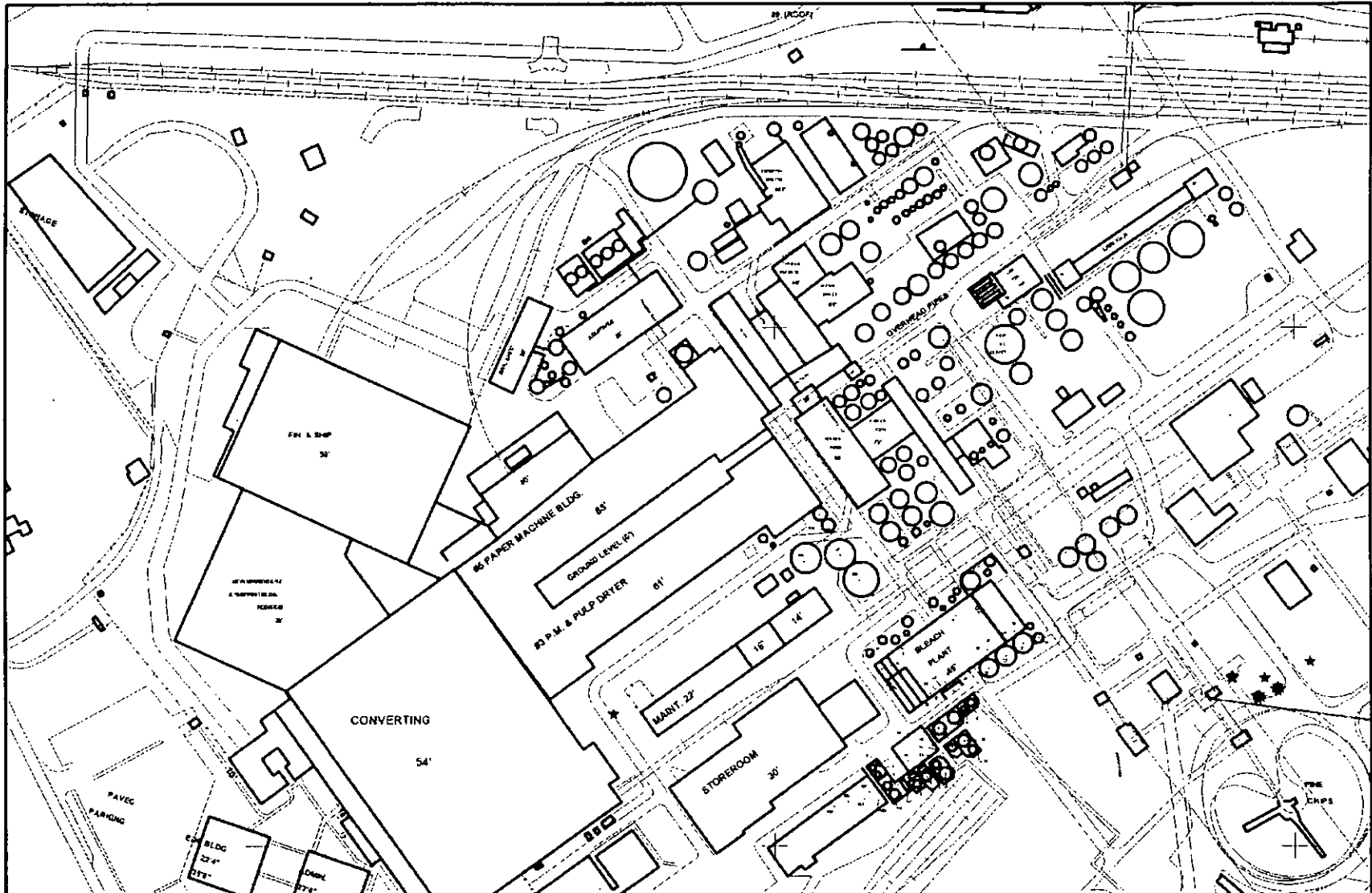
The IP Pensacola Mill is located in Escambia County in Cantonment, Florida. The mill is under the jurisdiction of the following State and Federal agencies:

**Florida DEP  
Division of Air Resources Management  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400**

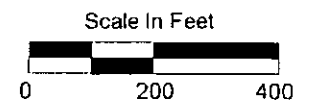
**United States EPA - Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303**

**Florida DEP, Northwest District Air Program  
160 Governmental Center  
Pensacola, Florida 32501-5794**

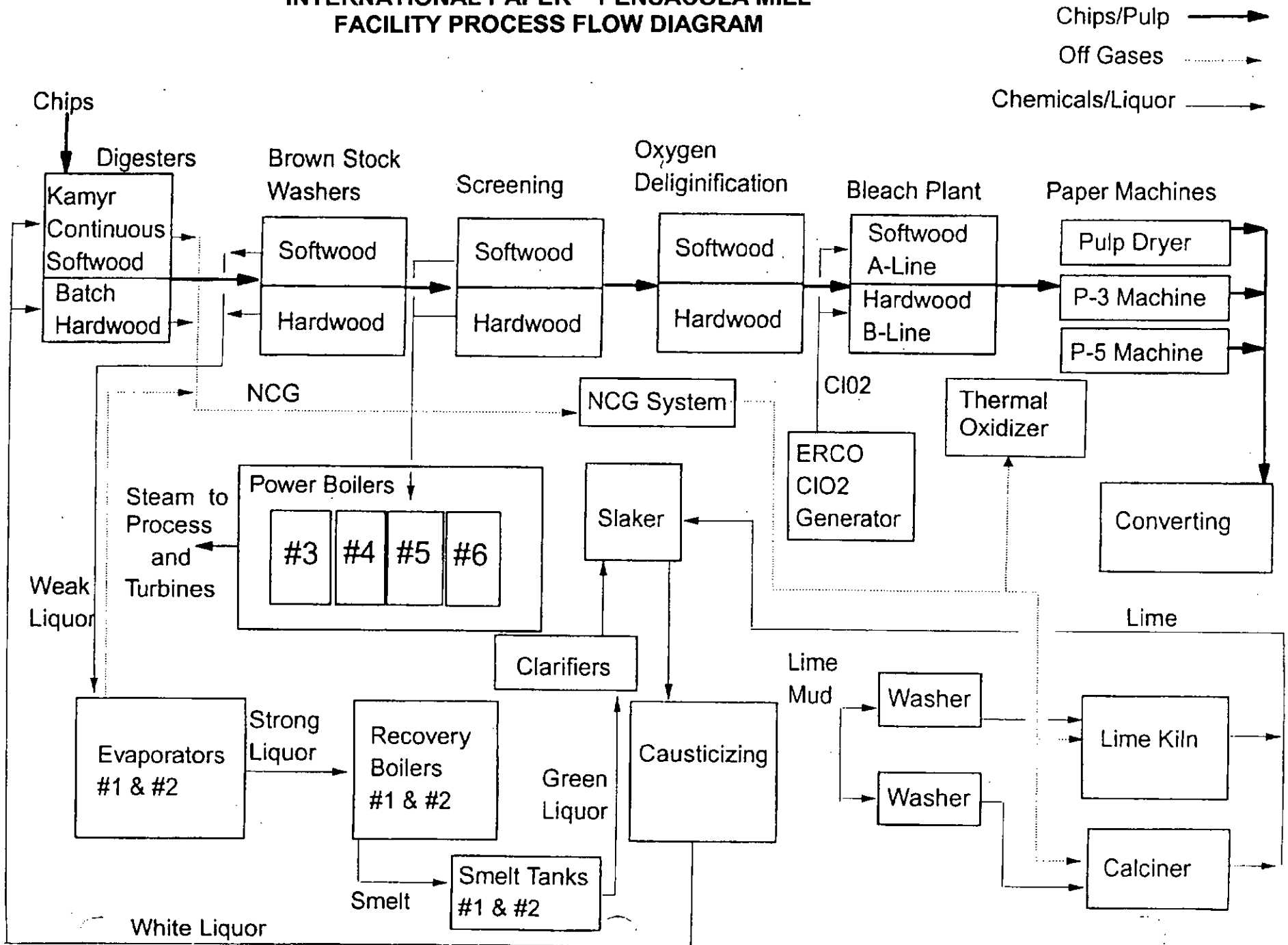
The IP Mill converts hardwood and softwood logs into wood pulp and paper through a variety of process operations. Figure 1-1 is a plot plan showing the location of the mill. Figure 1-2 is a process flow diagram depicting the overall operations at the IP Pensacola Mill.



**Figure 1-1**  
**Facility Plot Plan**  
**International Paper**  
**Pensacola, Florida**



**FIGURE 1-2  
INTERNATIONAL PAPER – PENSACOLA MILL  
FACILITY PROCESS FLOW DIAGRAM**





## **1.2 PROPOSED PROJECT**

The Pensacola Mill has initiated plans for a multi-year project to upgrade the waste water treatment system and install a pipeline to future constructed wetlands at the head of the Perdido Bay. The waste water treatment project is a multi-million dollar investment that will result in many environmental benefits for the area. However, there will be no economic return on investment (ROI) to the mill for the project. As a result, IP conducted a complete economic analysis for the Pensacola Mill operations and it was determined that, concurrently with the waste water treatment project, the mill will need to produce an additional 150 ADBT/day of slush pulp to offset the project costs and achieve an acceptable ROI for the mill operations. In order to achieve the pulp production capacity increase and secure the future viability of the Mill, IP has determined that it will be necessary to modify the following systems:

- Continuous Digester System
- No. 1 and No. 2 Recovery Furnaces and Smelt Dissolving Tanks
- No. 2 Evaporator Set
- Lime Kiln/Mud Dryer
- Bleach Plant
- Brown Stock Washer
- Lime Slaker/Causticizer (one new body, part of the set of 4 bodies)

IP would like to incorporate these changes over several planned mill outages beginning in the Fall of 2003. The staging of these changes is critical and several of the less substantial changes are required to be completed in the Fall of 2003 in order to enable the mill to make the significant modifications during the Spring and Fall 2004 outages.

## **1.3 PROPOSED PERMITTING APPROACH**

As outlined above, the successful completion of these projects requires extensive coordination and the initiation of several changes during the Fall 2003 outage. In order to accomplish this goal and to satisfy the preconstruction review requirements, IP proposes to use a phased permitting approach and to pursue a construction permit pursuant to 62-212.400(2)(d)4.b for the Phase I activities which will be reviewed as a “modification to a minor facility”.

During Phase I of the project, IP will maintain production levels equal to the historical actual production levels during the 1998/1999 calendar years to ensure that the first phase of the project will not trigger a Prevention of Signification Deterioration (PSD) permitting exercise. Phase I activities will be completed during the Fall 2003 Outage. These historical actual production values are provided below.

<i>Unit</i> <sup>(a)</sup>	<i>1998 Production</i>	<i>1999 Production</i>	<i>1998/1999 Average Production</i>
Continuous Digester Pulp Production (ADTBP/yr)	271,770	272,199	<b>271,985</b>
Batch Digester Pulp Production (ADTBP/yr)	261,824	270,259	<b>266,042</b>
Continuous Digester Pulp Production (ADTUP/yr))	293,512	293,975	<b>293,744</b>
Recovery Furnace BLS firing (Ton BLS/yr)	932,499	950,620	<b>941,560</b>
Lime Production (Ton CaO/yr)	152,506	157,710	<b>155,108</b>

<sup>(a)</sup> ADTBP/yr – air dried ton bleached pulp/yr. ADTUP/yr – air dried ton unbleached pulp/yr.  
Ton BLS/yr – ton black liquor solids/yr. Ton CaO/yr – ton CaO produced per year.

Concurrent with these activities, IP will work with the DEP to obtain a PSD permit for the Phase II activities that are scheduled to begin during the Spring 2004 outage. During the Phase II permitting, IP will consider all activities from both phases to complete the requisite PSD applicability analysis, detailed best available control determinations, and air quality modeling analysis.

With this permitting strategy as the framework for the project, IP proposes to include the following activities as part of the Phase I permitting and has addressed them in this application:

- Replace the existing extraction screens with diagonal extraction screens to improve downflow cooking in the Kamyrr Digester System. The Kamyrr Digester System is currently controlled by the Low Volume High Concentration (LVHC ) non-condensable gas (NCG) handling system and is routed to the thermal oxidizer for control. IP believes that this represents BACT for this unit and will identify it as such in the Phase II permitting activities.
- Installation of a new causticizer body and support piping. After completion of the Phase II activities, the addition of the new causticizer body in conjunction with changes to the Lime Slaker will enable the Mill to meet the future white liquor requirements to support the additional 150 ADBT/day. IP has reviewed the RACT/BACT/LAER Clearinghouse (RBLC) for BACT determinations for causticizers. The only BACT entry is for particulate matter emissions for a combined slaker/causticizer vent. The Pensacola Mill causticizer and slaker vent through separate stacks. IP has historically identified particulate matter emissions from the slaker; however, IP does not have any data to indicate particulate matter emissions from the causticizers. As a result, IP believes that BACT is no control for the new causticizer body and will address it as such in the Phase II permitting activities.
- Replacement of two (2) medium consistency (MC) pumps in the Pine O<sub>2</sub> Delignification and bleach plant area. After completion of the Phase II activities, when three (3) additional MC pumps will be replaced, the new MC pumps will enable the Mill to meet the additional 150 ADBT/day. IP does not believe that the new MC pumps qualify as emission units and consequently BACT is not applicable to the new MC pumps.

#### **1.4 PROJECT SCHEDULE**

All of the Phase I activities are scheduled to commence during the Fall 2003 Outage. IP recognizes that these activities may not commence until after receipt of a permit to construct and is prepared to work closely with DEP to satisfy this timeline. IP also envisions submitting the Phase II permit application in late Spring 2003 in order to obtain the Phase II construction Permit in the late Fall 2003.

IP has communicated this aggressive project timeline to DEP and appreciates the commitment from DEP to work towards these goals. IP is prepared to assist DEP with meeting these goals to ensure the future viability of the Mill and successful completion of the waste water treatment project.

### 1.5 APPLICATION ORGANIZATION

The remainder of this application includes the following information and documentation to support this application to obtain a permit to construct:

- Section 2: Emissions Inventory – provides information on the methods used to calculate the actual emission rates and the future potential to emit for the Phase I activities.
- Section 3: Applicable Requirements – contains a summary of Federal and State of Florida air regulations potentially applicable to the proposed project.
- Section 4: DEP Application Forms – contains all of the required DEP forms for a complete application.

## 2. EMISSIONS INVENTORY

IP calculated emissions associated with the Phase I activities to determine if there were an emissions increase associated with any PSD pollutants. A summary of the emission calculations provided for each of the Phase I emissions units is provided below. Table 2-1 summarizes the emission inventory for the Phase I activities.

### 2.1 CAUSTICIZING OPERATIONS

IP reviewed the emissions associated with the addition of a new causticizer body. IP has historically identified VOC emissions from the causticizers and used an emission factor of 0.00139 lb/ton CaO. Since the causticizer body is new, IP identified no emissions for the 1998/1999 baseline scenario and used the 1998/1999 average production rate and the historical VOC emission factor to develop the future post Phase I activities emission rate (i.e., future potential to emit).

### 2.2 A AND B BLEACH PLANT LINES (E.U. 050 AND 051)

IP has historically quantified VOC emissions from the bleach plant scrubbers. In addition to VOC emissions, NCASI has identified CO emissions from bleach plant sources (see NCASI Technical Bulletin 760, Mill SA data). IP has selected a CO emission factor of 0.63 lb/oven dried tons of paper (ODTP) for the A Bleach Plant Line and 0.54 lb/ODTP for the B Bleach Plant Line. IP has also used mill-specific test data of 0.52 lb/hr for VOC emissions from the A Bleach Plant Line and 0.39 lb/hr for VOC emissions from the B Bleach Plant Line.

### 2.3 KAMYR DIGESTER SYSTEM (E.U. 063)

The Kamyr Digester System is one of the multiple sources that are routed to the LVHC NCG Handling System and vented to the thermal oxidizer or the lime kiln. The Kamyr Digester System gas stream contains VOC, TRS, and hazardous air pollutants (HAPs). IP quantified VOC and TRS emissions from Kamyr Digester System venting scenarios for the 1998/1999

baseline scenario (165 hours) since the gases are normally routed to the Lime Kiln. A ratio of the vent hours to total Kamyr operating hours was used along with uncontrolled VOC and TRS emission factors and the total unbleached pulp production from the Kamyr Digester System to develop actual emission rates during the venting conditions. In the future post Phase I activities scenario, IP used the 40 CFR 60, Subpart S allowable vent time of 1% which equates to a maximum of 87.6 hours. IP also used the uncontrolled VOC and TRS emission factors and the Kamyr Digester System unbleached production values to develop the emission rates.

TABLE 2-1  
INTERNATIONAL PAPER - PENSACOLA MILL  
SUMMARY OF PHASE I ACTIVITIES  
EMISSIONS INVENTORY

E.U. NUMBER	EMISSIONS UNIT	1998/1999 BASELINE EMISSIONS					FUTURE POST PHASE I EMISSIONS					PHASE I ACTIVITIES (PROJECT RELATED) EMISSIONS
		POLLUTANT	EMISSION FACTOR <sup>(a)</sup>	UNITS	THROUGHPUT <sup>(b)</sup>	UNITS	EMISSION RATE (TONS/YR) <sup>(c)</sup>	EMISSION FACTOR	UNITS	THROUGHPUT	UNITS	EMISSION RATE (TONS/YR) <sup>(d)</sup>
N/A	Causticizing Operations - New Causticizer	VOC	0.00139 lb/ton CaO		0 tons CaO/yr	0	0.00139 lb/ton CaO		155,108 tons CaO/yr		0.11	0.11
050, 051	Bleach Plant Operations											
	A Bleach Plant Line (Softwood)	CO	0.63 lb/ODTP		245,030 ODTP/yr	77.18	0.63 lb/ODTP		245,030 ODTP/yr		77.18	0.00
	B Bleach Plant Line (Hardwood)	CO	0.54 lb/ODTP		239,677 ODTP/yr	64.71	0.54 lb/ODTP		239,677 ODTP/yr		64.71	0.00
	A Bleach Plant Line (Softwood)	VOC	0.52 lb/hr		8,236 hr/yr	2.14	0.52 lb/hr		8,236 hr/yr		2.14	0.00
	B Bleach Plant Line (Hardwood)	VOC	0.39 lb/hr		8,327 hr/yr	1.62	0.39 lb/hr		8,327 hr/yr		1.62	0.00
063	Kamyr Digester System	VOC			165 vent hours/yr	3.19			88 vent hours/yr		1.98	-1.21
		TRS			165 vent hours/yr	8.55			88 vent hours/yr		7.34	-1.21

(a) - The origination of the emission factors is explained in the Section 2 narrative.

(b) - Bleach Plant ODTP/yr throughput numbers are based on 1998/1998 baseline ADTP/yr values using a conversion of 1.11 ADTP/ODTP (NCASI TB 676). Bleach Plant hours of operation are based on 1999 actual hours of operation.

(c) - Baseline emission rates are 0 tons/yr for the New Causticizer (not in operation) and baseline emission rates for the Kamyr Digester system are based on actual direct to atmosphere venting time (see 1998 and 1999 AOR) as the gases were normally routed to the Lime Kiln during the 1998/1999 time period. The vent time was combined with the uncontrolled emission factors of 5 lb/ADTUP for TRS and 1.35 lb/ADTUP for VOC to calculate emissions.

(d) - Future Post Phase I emission rates are based on the NCASI emission factor and the average 1998/1999 production rates for the New Causticizer. Emission rates for the Kamyr Digester System are based on the 40 CFR 60, Subpart S 1% allowable venting time (87.6 hours), the mill uncontrolled VOC and TRS emission factors from note (c) above, and the total 1998/1999 unbleached pulp production from the Kamyr Digester System.

$$(\text{Emission Factor [lb/ADTUP]})(293,744 [\text{ADTUP/yr}])(87.6 [\text{vent hours}])(8760 [\text{operating hours}])(2000 [\text{lb/ton}])$$

(e) - Project Related emissions are based on the difference of the Future Post Phase I emission rates and the 1998/1999 baseline emission rates

### 3. APPLICABLE REQUIREMENTS

The Pensacola Mill has reviewed the federal and State of Florida air quality regulations to determine which regulations potentially apply to Phase I of the proposed project. Regulations that the facility has determined are generally applicable such as Chapter 62-296.320(2) regulating opacity and Chapter 62-296.320(4)(b) regulating objectionable odors are neither identified nor discussed herein since they apply facility-wide.

#### 3.1 FEDERAL AIR QUALITY REGULATIONS

For the purpose of this application, potentially applicable federal regulations are defined as:

- New Source Performance Standards (NSPS)
- National Emission Standards for Hazardous Air Pollutants (NESHAP)
- New Source Review (NSR)
- Compliance Assurance Monitoring (CAM)

A discussion of each specific federal requirement is provided in the following subsections.

##### 3.1.1 New Source Performance Standards (NSPS)

The United States Environmental Protection Agency (EPA) has promulgated standards of performance for new, modified, or reconstructed sources of air pollution at 40 CFR Part 60. The Causticizing Operations and the A and B Bleach Plant Lines (E.U. 050 and 051) are not regulated under a source category listed in 40 CFR Part 60. The facility's Kamyr Digester System (E.U. 063) is already subject to the provisions of 40 CFR 60 in 40 CFR 60, Subpart BB and will not be impacted by the Phase I activities.

##### 3.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

NESHAPs promulgated prior to the Clean Air Act Amendments (CAAA) of 1990, found in 40 CFR Part 61, apply to specific compounds emitted from certain listed processes. Pursuant to the CAAA of 1990, process-specific NESHAP are promulgated in 40 CFR Part 63. NESHAPs



promulgated under 40 CFR Part 63, also referred to as Maximum Achievable Control Technology (MACT) standards, apply to certain identified source categories that are considered area sources or major sources of hazardous air pollutants (HAP). A major source of HAP is defined as a source with the facility-wide potential to emit any single HAP of 10 tons per year or more, or with a facility-wide potential to emit total HAP of 25 tons per year or more.

The Pensacola Mill qualifies as a major source of HAPs and various processes at the Mill are subject to NESHAPs promulgated under 40 CFR Part 61 and MACT standards under 40 CFR Part 63. The A and B Bleach Plant Lines (E.U. 050 and 051) and the Kamyrdigester System (E.U. 063) are subject to 40 CFR 63, Subpart S. The activities associated with Phase I of this permitting exercise will not impact the applicability of 40 CFR 63, Subpart S or any other NESHAP/MACT standards.

### **3.1.3 New Source Review (NSR)**

Escambia County is classified as in attainment or unclassifiable for the NAAQS for all NSR-regulated pollutants; therefore, Nonattainment New Source Review regulations do not apply to this project. However, the project must be evaluated for PSD-significance since the Pensacola Mill is classified as a major source with respect to the federal PSD rules.

The only sources subject to the PSD regulations are “major stationary sources” and “major modifications” located in areas designated as attainment or unclassifiable for the NAAQS. The proposed Phase I activities described herein, by themselves, do not trigger PSD regulations since the project related emissions increases (i.e., total future potential to emit from new and modified emissions units minus baseline actual emission rates) are below the PSD-significance levels for all PSD pollutants. The Phase II activities will trigger the PSD regulations and any emissions associated with the Phase I activities will also be included in the Phase II PSD permitting analysis.

### 3.1.4 Compliance Assurance Monitoring (CAM)

EPA's CAM rule is codified at 40 CFR Part 64. Section 64.2 of the CAM rule specifies the criteria for determining applicability with the CAM rule, and Table 3-2 summarizes the applicability requirements for Part 64. If an emissions unit satisfies *all* of the applicability requirements listed in Table 3-1, the emissions unit is subject to CAM. Otherwise, Part 64 does not apply to the emissions unit.

**Table 3-1  
CAM Applicability Requirements Summary**

Part 64 Reference	Requirement
§64.2(a)	Unit is located at major source that is required to obtain a Title V permit.
§64.2(a)(1)	Unit is subject to an emission limitation or standard for an applicable pollutant.
§64.2(a)(2)	Unit uses a control device to achieve compliance with this applicable limitation or standard (See §64.1 for definition of control device).
§64.2(a)(3)	Potential pre-control emissions of the applicable pollutant from the unit are at least 100 percent of major source threshold amount (i.e., greater than 100 ton/yr).
§64.2(a)(b)	Unit is not otherwise exempt.

Based on the aforementioned criteria, none of the units impacted by the Phase I activities is subject to the CAM rule since they do not use a control device to achieve compliance with an applicable emission limitation or they do not have pre-controlled emissions that are greater than 100 ton/yr.

### 3.2 STATE OF FLORIDA REQUIREMENTS

The proposed modified emissions units are potentially subject to the following State of Florida air regulations which are codified in Chapter 62 of the Florida Administrative Code (F.A.C.):

- Chapter 62-204 – Air Pollution Control - General Provisions
- Chapter 62-212 – Preconstruction Review
- Chapter 62-213 – Operation Permits for Major Sources for Air Pollution

- Chapter 62-296 – Stationary Sources - Emission Standards
- Unit-specific Title V Permit Conditions

A discussion of each specific state requirement is provided in the following subsections.

### **3.2.1 Chapter 62-204 – Air Pollution Control - General Provisions**

The provisions of this rule establish the framework for the Florida air permitting programs. The IP Mill has undergone numerous permitting exercises at the Mill over its lifetime and are subject to the general provisions outlined in Chapter 62-204.

### **3.2.2 Chapter 62-212 Stationary Sources – Preconstruction Review**

Chapter 62-212 adopts and implements parts of the federal regulations and also outlines specific requirements for Florida. As previously stated in Section 3.1.3, the proposed Phase I activities project is not subject to the Nonattainment provisions of the rule since the Mill is located in an attainment area. In addition, the Phase I activities are not subject to the PSD provisions of the rule since they qualify as a “Modification to a Minor Facility” pursuant to 62-212.400(2)(d)4.b.

### **3.2.3 Chapter 62-213 Operation Permits for Major Sources of Air Pollution**

Chapter 62-213 implements the Title V Operating Permit Program. As previously stated in the introduction, The IP Mill is a major stationary source with respect to Title V and currently operates pursuant to a Title V Operating Permit (Permit No. 0330042-005-AV). IP will continue to operate pursuant to this permit and will work with the DEP to update the permit to include the Phase I and Phase II activities at a later date, independent of these permitting exercises.

### **3.2.4 Chapter 62-296 – Stationary Sources - Emission Standards**

There Phase I activities are potentially subject to Chapter 62-296.404 – Kraft (Sulfate) Pulp Mills and Tall Oil Plants. The Kamyr Digester System (E.U. 063) is currently subject to the total reduced sulfur emissions provisions of this rule and will continue to be subject to these requirements.

### **3.2.5 Unit-specific Title V Permit Conditions**

The Pensacola Mill is currently operating pursuant to a Title V Operating Permit. Provided below is a summary of the existing Title V Permit conditions that impact the Phase I activities.

The Causticizing Operations and the A and B Bleach Plant Lines (E.U. 050 and 051) are not regulated under a source category listed in 40 CFR Part 60. The facility's Kamyr Digester System (E.U. 063) is subject to 40 CFR 60, Subpart BB and these requirements have been incorporated into the Mill's Title V Permit.

#### **3.2.5.1 Causticizing Operations**

The causticizing operations have been identified as an Unregulated Emissions Unit under Appendix U of the Title V Operating Permit and are not subject to any unit-specific requirements.

#### **3.2.5.2 A and B Bleach Plant Lines (E.U. 050 and 051)**

The A and B Bleach Plant Lines are subject to the following Title V Permit Requirements:

- The maximum operating rate for the A Bleach Plant Line is 888 air dried bleached tons per day.
- The maximum operating rate for the B Bleach Plant Line is 830 air dried bleached tons per day.
- The Maximum average total for both lines is 1,500 air dried bleached tons per calendar day.
- The bleach plant lines are permitted to operate 8,760 hours per year.
- The Mill shall demonstrate compliance with emission standards by using a surrogate parameter control of the scrubber white liquor pH (minimum of 10.0, 12-hour average).

### 3.2.5.3 *Kamyr Digester System (E.U. 063)*

The Kamyr Digester System is subject to the following Title V Permit Requirements:

- The Kamyr Digester System is vented to the Low Volume High Concentration (LVHC) Non-Condensable Gas (NCG) Handling System.
- For the purposes of performance testing, the maximum operating rate for the Kamyr Digester System is 40 air dried unbleached tons per hour.
- The Kamyr Digester System is permitted to operate 8,760 hours per year.
- Emissions from the Kamyr Digester System shall be collected and incinerated in the thermal oxidizer or the lime kiln.
- A log on NCG venting shall be maintained and available for inspection.
- Cumulative venting time shall not exceed ten days in any annual period.

#### 4. DEP APPLICATION FORMS

FAC 62-213.420(1) requires Title V facilities to complete DEP permit application forms as part of the Title V application package. This section of the application report is comprised of the completed DEP 62-210.900 (1) Title V Permit Application forms. The forms are divided into the following sections.

- **SECTION I – Application Information** – includes facility identification and general information on the scope and purpose of the application.
- **SECTION II – Facility Information** – provides general facility information, facility regulations, facility pollutants and facility supplemental information.
- **SECTION III – Emissions Unit Information** – provides general emission unit information, emissions unit capacity, emissions unit regulations, emission point data, process/fuel data, emissions unit pollutants, emission unit pollutant detail information, visible emission information, continuous monitor information, and emissions unit supplemental information for each of the significant emissions units, as listed below.

# APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

## I. APPLICATION INFORMATION

### Identification of Facility

1. Facility Owner/Company Name: <i>International Paper Company</i>	
2. Site Name: <i>Pensacola Mill</i>	
3. Facility Identification Number: <i>10PEN170042</i> <input type="checkbox"/> Unknown	
4. Facility Location: <i>Cantonment, FL</i> Street Address or Other Locator: <i>375 Muscogee Road</i> City: <i>Cantonment</i> County: <i>Escambia</i> Zip Code: <i>32533-0087</i>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

### Application Contact

1. Name and Title of Application Contact: <i>Jim Spahr, Senior Environmental Engineer</i>	
2. Application Contact Mailing Address: Organization/Firm: <i>International Paper Company Pensacola Mill</i> Street Address: <i>375 Muscogee Road</i> City: <i>Cantonment</i> State: <i>FL</i> Zip Code: <i>32533-0087</i>	
3. Application Contact Telephone Numbers: Telephone: <i>(850) 968 - 2121 x3833</i> Fax: <i>(850) 968 - 3068</i>	

### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<i>4-22-03</i>
2. Permit Number:	<i>0330049-007-AG</i>
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**Purpose of Application**

**Air Operation Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.  
Current construction permit number: \_\_\_\_\_
- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.  
Current construction permit number: \_\_\_\_\_  
Operation permit number to be revised: \_\_\_\_\_
- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)  
Operation permit number to be revised/corrected: \_\_\_\_\_
- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.  
Operation permit number to be revised: \_\_\_\_\_  
Reason for revision: \_\_\_\_\_

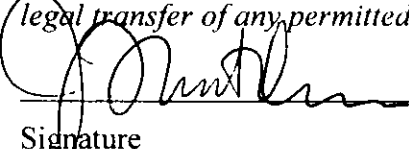
**Air Construction Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.



**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: <b>J. Todd Crutcher, Operations Manager</b>
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: <b>International Paper Company Pensacola Mill</b> Street Address: <b>375 Muscogee Road</b> City: <b>Cantonment</b> State: <b>FL</b> Zip Code: <b>32533-0087</b>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <b>( 850 ) 968 - 2121</b> Fax: <b>( 850 ) 968 - 3068</b>
4. Owner/Authorized Representative or Responsible Official Statement: <p><i>I, the undersigned, am the owner or authorized representative*(check here [ ], if so) or the responsible official (check here [ ], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i></p> <p> _____ Signature</p> <p><u>4/21/03</u> Date</p>

\* Attach letter of authorization if not currently on file.

**Professional Engineer Certification**

1. Professional Engineer Name: <b>Daniel B. Smith</b> Registration Number: <b>35633</b>
2. Professional Engineer Mailing Address: <b>P. O. Box 12101 Pensacola, FL 32590</b> Organization/Firm: <b>Cornerstone Engineering</b> Street Address: <b>125 South Alcaniz</b> City: <b>Pensacola</b> State: <b>Florida</b> Zip Code: <b>32502</b>
3. Professional Engineer Telephone Numbers: Telephone: <b>( 850 ) 438 - 3449</b> Fax: <b>( 850 ) 438 - 9376</b>

4. Professional Engineer Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*


*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [  ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [  ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*

  
Signature 4-17-03

4-17-03  
Date

(seal)

\* Attach any exception to certification statement.



**Construction/Modification Information**

1. Description of Proposed Project or Alterations:

*See attached application narrative*

2. Projected or Actual Date of Commencement of Construction: *10/03*

3. Projected Date of Completion of Construction: *12/03*

**Application Comment**

## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates:			
Zone:	East (km):	North (km):	
2. Facility Latitude/Longitude:			
Latitude (DD/MM/SS): <i>30/30/19</i>		Longitude (DD/MM/SS): <i>87/19/13</i>	
3. Governmental Facility Code:	4. Facility Status Code:	5. Facility Major Group SIC Code:	6. Facility SIC(s):
<i>0</i>	<i>A</i>	<i>26</i>	<i>2611</i>
7. Facility Comment (limit to 500 characters):			

#### Facility Contact

1. Name and Title of Facility Contact:		
<i>Jim Spahr, Senior Environmental Engineer</i>		
2. Facility Contact Mailing Address:		
Organization/Firm: <i>International Paper Company Pensacola Mill</i>		
Street Address: <i>375 Muscogee Road</i>		
City: <i>Cantonment</i>	State: <i>FL</i>	Zip Code: <i>32533-0087</i>
3. Facility Contact Telephone Numbers:		
Telephone: <i>(908 ) 968 - 2121 x 3833</i>		Fax: <i>(908 ) 968 - 3068</i>

**Facility Regulatory Classifications**

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input checked="" type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input checked="" type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters):	

**List of Applicable Regulations**

<i>See attached application narrative</i>	







**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <i>See attached application narrative</i> <input checked="" type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input checked="" type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: <u>March 23, 2001 – NW District Air Program – Change of ownership</u> ) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION  
(All Emissions Units)**

**Emissions Unit Description and Status**

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p><i>Causticizing Area</i></p>			
<p>4. Emissions Unit Identification Number: <span style="float: right;"><input checked="" type="checkbox"/> No ID</span></p> <p>ID: <span style="float: right;"><input type="checkbox"/> ID Unknown</span></p>			
<p>5. Emissions Unit Status Code:</p> <p><i>A</i></p>	<p>6. Initial Startup Date:</p> <p><i>Variable</i></p>	<p>7. Emissions Unit Major Group SIC Code:</p> <p><i>26</i></p>	<p>8. Acid Rain Unit?</p> <p><i>[NO]</i></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p>			

**Emissions Unit Control Equipment**

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):  <i>None</i></p>
<p>2. Control Device or Method Code(s): <i>None</i></p>

**Emissions Unit Details**

<p>1. Package Unit: <i>NA</i>          Manufacturer: <i>NA</i> <span style="float: right;">Model Number: <i>NA</i></span></p>						
<p>2. Generator Nameplate Rating: <i>NA</i> <span style="float: right;">MW</span></p>						
<p>3. Incinerator Information:</p> <table style="width: 100%; border: none;"> <tr> <td style="text-align: right;">Dwell Temperature: <i>NA</i></td> <td style="text-align: right;">°F</td> </tr> <tr> <td style="text-align: right;">Dwell Time: <i>NA</i></td> <td style="text-align: right;">seconds</td> </tr> <tr> <td style="text-align: right;">Incinerator Afterburner Temperature: <i>NA</i></td> <td style="text-align: right;">°F</td> </tr> </table>	Dwell Temperature: <i>NA</i>	°F	Dwell Time: <i>NA</i>	seconds	Incinerator Afterburner Temperature: <i>NA</i>	°F
Dwell Temperature: <i>NA</i>	°F					
Dwell Time: <i>NA</i>	seconds					
Incinerator Afterburner Temperature: <i>NA</i>	°F					

**B. EMISSIONS UNIT CAPACITY INFORMATION**  
(Regulated Emissions Units Only)

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate: <i>NA</i>	mmBtu/hr
2. Maximum Incineration Rate: <i>NA</i>	lb/hr                      tons/day
3. Maximum Process or Throughput Rate: <i>NA</i>	
4. Maximum Production Rate: <i>NA</i>	
5. Requested Maximum Operating Schedule:	
24 hours/day	7 days/week
52 weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	



**D. EMISSION POINT (STACK/VENT) INFORMATION**  
(Regulated Emissions Units Only)

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code: <i>NA</i>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): <i>NA</i>			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION**  
(All Emissions Units)

**Segment Description and Rate:** Segment  1  of  1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): <i>Not Classified</i>		
2. Source Classification Code (SCC): <i>3-07-001-99</i>	3. SCC Units: <i>NA</i>	
4. Maximum Hourly Rate: <i>NA</i>	5. Maximum Annual Rate: <i>NA</i>	6. Estimated Annual Activity Factor: <i>NA</i>
7. Maximum % Sulfur: <i>NA</i>	8. Maximum % Ash: <i>NA</i>	9. Million Btu per SCC Unit: <i>NA</i>
10. Segment Comment (limit to 200 characters): <i>Causticizing Area</i>		

**Segment Description and Rate:** Segment \_\_\_\_\_ of \_\_\_\_\_

1. Segment Description (Process/Fuel Type ) (limit to 500 characters):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		





**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions** *See attached application narrative*

1. Pollutant Emitted:	2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour	tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year		
6. Emission Factor: Reference:	7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):		
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):		

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <i>NA</i>	2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:	lb/hour	4. Equivalent Allowable Emissions: tons/year
5. Method of Compliance (limit to 60 characters):		
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):		





**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION  
(All Emissions Units)**

**Emissions Unit Description and Status**

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p><b><i>Bleach Plant Operations</i></b></p>			
<p>4. Emissions Unit Identification Number: <span style="float: right;"><input type="checkbox"/> No ID</span></p> <p>ID: <b><i>050 and 051</i></b> <span style="float: right;"><input type="checkbox"/> ID</span></p>			
<p>5. Emissions Unit Status Code:</p> <p><b><i>A</i></b></p>	<p>6. Initial Startup Date:</p> <p><b><i>1985</i></b></p>	<p>7. Emissions Unit Major Group SIC Code:</p> <p><b><i>26</i></b></p>	<p>8. Acid Rain Unit?</p> <p><b><i>[NO]</i></b></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p>			



**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate: <i>NA</i>	mmBtu/hr
2. Maximum Incineration Rate: <i>NA</i>	lb/hr                      tons/day
3. Maximum Process or Throughput Rate: <i>888 ADTBP/day (A Line), 830 ADTBP/day (B Line)</i>	
4. Maximum Production Rate: <i>NA</i>	
5. Requested Maximum Operating Schedule:	
24 hours/day	7 days/week
52 weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	





**D. EMISSION POINT (STACK/VENT) INFORMATION**  
(Regulated Emissions Units Only)

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? <i>NA</i>		2. Emission Point Type Code:	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): <i>MC pumps will not contain Emission Points and will not emit regulated air pollutants.</i>			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION**  
**(All Emissions Units)**

**Segment Description and Rate:** Segment  1  of  1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): <i>Not Classified</i>		
2. Source Classification Code (SCC): <i>3-07-001-99</i>		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**Segment Description and Rate:** Segment \_\_\_\_\_ of \_\_\_\_\_

1. Segment Description (Process/Fuel Type ) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		



**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
 (Regulated Emissions Units -  
 Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions See attached application narrative

1. Pollutant Emitted:		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <i>NA</i>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	





**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION  
(All Emissions Units)**

**Emissions Unit Description and Status**

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p><i>Kamyr Digester System (LVHC NCG Handling System)</i></p>			
<p>4. Emissions Unit Identification Number:</p> <p>ID: <i>063</i></p>		<p><input type="checkbox"/> No ID <input type="checkbox"/> ID</p>	
<p>5. Emissions Unit Status Code:</p> <p><i>A</i></p>	<p>6. Initial Startup Date:</p> <p><i>1982</i></p>	<p>7. Emissions Unit Major Group SIC Code:</p> <p><i>26</i></p>	<p>8. Acid Rain Unit?</p> <p><i>[No]</i></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p>			





**B. EMISSIONS UNIT CAPACITY INFORMATION**  
**(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate: <i>NA</i>	mmBtu/hr
2. Maximum Incineration Rate: <i>NA</i>	lb/hr                      tons/day
3. Maximum Process or Throughput Rate: <i>960 ADTUP/day</i>	
4. Maximum Production Rate: <i>NA</i>	
5. Requested Maximum Operating Schedule:	
<i>24</i> hours/day	<i>7</i> days/week
<i>52</i> weeks/year	<i>8760</i> hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	



**D. EMISSION POINT (STACK/VENT) INFORMATION**  
**(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code: <i>NA</i>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): <i>NA – Emission Unit is vented to the Thermal Oxidizer or Lime Kiln.</i>			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION**  
(All Emissions Units)

**Segment Description and Rate:** Segment  1  of  1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): <i>Digester/blow tank</i>		
2. Source Classification Code (SCC): <i>3-07-001-01</i>		3. SCC Units: <i>ADTUP</i>
4. Maximum Hourly Rate: <i>40</i>	5. Maximum Annual Rate: <i>350,400</i>	6. Estimated Annual Activity Factor: <i>NA</i>
7. Maximum % Sulfur: <i>NA</i>	8. Maximum % Ash: <i>NA</i>	9. Million Btu per SCC Unit: <i>NA</i>
10. Segment Comment (limit to 200 characters):		

**Segment Description and Rate:** Segment   of

1. Segment Description (Process/Fuel Type ) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		



**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
 (Regulated Emissions Units -  
 Emissions-Limited and Preconstruction Review Pollutants Only)

**Potential/Fugitive Emissions** *See attached application narrative*

1. Pollutant Emitted:	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour	4. Synthetically Limited? [ ] tons/year
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters):	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <i>NA</i>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	







**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable