

# Rayonier

*Performance Fibers*

*Fernandina Mill*

September 19, 2008

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BUREAU OF AIR REGULATION

**Certified Mail, Return Receipt Requested**

Mr. Jeffery F. Koerner, P. E.  
Bureau of Air Regulation  
Division of Air Resources Management  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399-2400

RE: Request to Modify Air Construction Permit 0890004-018-AC and  
Air Construction Permit 0890004-022-AV

Dear Mr. Koerner:

Project No. : 0890004-023-AC

**Air Construction Permit 0890004-018AC**

Rayonier Performance Fiber LLC ("Rayonier") is requesting that Air Construction Permit 0890004-018 be renewed as described below. The permit was issued on February 20, 2006 to Rayonier for the purpose of approving the construction of No. 6 boiler and a two phase production increase at its Fernandina Beach dissolving sulfite pulp mill. The permit includes an expiration date of March 1, 2009. Rayonier is requesting that this deadline be extended to allow for the completion of construction.

The construction authorized by the permit is more than half completed. The No. 6 boiler is operational, the new evaporators are installed and operational and the revised digester operating rate instituted, but due to other operational problems the phase 1 annual production has not yet been achieved.

There are two remaining projects authorized by this Air Construction Permit. The phase two production increase to 175,000 ADMT/day is approved at Condition D.1.b: "Upon successful installation and submittal of the engineering report of the HCE blow heat recovery system to control VOC emissions from all the HCE cells, the facility's production shall not exceed 175,000 ADMT per consecutive 12-months, rolling total." Construction of the HCE blow heat recovery system has been delayed by market conditions and is now on the budget for 2013. This system is comparable to an LVHC system on a Kraft mill and may take as long as a year to complete. Rayonier is asking for an expiration date 10 years from the date of issuance, or until 2016. The actual annual production rate has not been increased above the previously permitted rate of 162,000 ADMT/day.

Registered to ISO 9001:2000



Certificate No. A2072

10 Gum Street • P.O. Box 2002 • Fernandina Beach, FL 32035-2002  
Telephone (904) 261-3611 • Fax (904) 277-1411

Mr. Jeffery F. Koerner, P. E.  
Air Construction Permit Modification  
September 8, 2008  
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The second remaining project is the bleach plant scrubber and/or other equipment installation needed to comply with 40 CFR 63.445. This project is being engineered now and will be completed by the deadline of March 2010 required by Condition F1 of the permit. This deadline is after the permit expiration.

It is clear from the Part 403.087 FS there is no limit on the term of an air construction permit, though there is for a water permit (10 years). From Department rules 62-210.300 Air Construction Permit shall be issued for a period of time sufficient to allow the construction and operation while the owner/operator is conducting testing or otherwise demonstrating initial compliance. Rayonier is hereby advising that additional time is necessary to allow for completion of construction and subsequent compliance demonstrations.

Rayonier requests the expiration date for this permit be extended to February 2016 or 10 years from the date of issuance.

**Air Construction Permit 0890004-001-AC**

This application also requests Air Construction Permit 0890004-001-AC be modified to increase the limit on red liquor solids firing rate for 70,000 to 73,000 pounds per hour. Attached is a stack test conducted May 14, 2008 by STACS demonstrating that the boiler is now capable of firing red liquor solids at a rate of 73,000 pounds per hour while still complying with its existing permit limits. No change to the emission limit is requested. Actual emission increases will not exceed the PSD Significance Levels in part because the annual rate will not increase above that permitted from the production increase. This appears to be a minor modification.

If you have questions regarding this application please contact David Rogers at (904)277-1346, email: [david.rogers@rayonier.com](mailto:david.rogers@rayonier.com) or David Tudor at (904)557-8332, email: [david.tudor@rayonier.com](mailto:david.tudor@rayonier.com) .

Sincerely,



F. J. Perrett  
General Manager

cc: Bruce Mitchell  
Corrine Brown  
Christopher Kirts  
Terry Cole, FPPA-EA  
Rita Felton-Smith

**SOURCE TESTING AND CONSULTING SERVICES, INC.**  
**1100 Purple Glory Drive**  
**Apex, NC 27502**  
**PH: (919) 367-2200/FAX: (919) 367-2222**  
[www.stacsinc.com](http://www.stacsinc.com)

September 8, 2008

David Rogers  
Rayonier Environmental  
Rayonier Performance Fibers, LLC.  
Foot of Gum Street  
Fernandina Beach, Florida 32034

RE: Sulfite Recovery Boiler Engineering Tests

Dear Mr. Rogers:

Source Testing And Consulting Services, Inc. (STACS) conducted a series of elevated load engineering tests at the Rayonier Performance Fibers, LLC facility in Fernandina Beach, Florida. Testing was conducted at the Sulfite Recovery Boiler using EPA Methods 1-4 for volumetric flow-rate determination and EPA Method 5 for particulate matter. Three one-hour test runs were conducted.

The results of these tests are summarized in the attached Table 1. We have also provided the analytical data and the field data sheets used in sampling, as well as the pre-test and post-test dry gas meter calibration data and facility process data.

If you have any questions concerning this information or if I may be of service in any other way, please do not hesitate to contact me at (919) 367-2200 or by e-mail at [billmayhew@stacsinc.com](mailto:billmayhew@stacsinc.com). Thank you and best regards.

Sincerely,

**SOURCE TESTING AND CONSULTING SERVICES, INC.**

*Bill Mayhew*

Bill Mayhew  
Principal Engineer

**Table 1. Summary of Emissions Testing Data - Total Solid Particulate Matter  
Rayonier  
SRB Stack**

| Parameter  | Units      | Run #       | 1         | 2         | 3         | AVERAGE |
|--|------------|-------------|-----------|-----------|-----------|---------|
|  |            | Date:       | 14-May-08 | 16-May-08 | 16-May-08 |         |
|  |            | Start Time: | 16:10     | 8:20      | 12:40     |         |
|  |            | Stop Time:  | 17:12     | 9:21      | 13:42     |         |
| <b>Sampling Train &amp; Analytical Parameters:</b>     |            |             |           |           |           |         |
| Total Solid Particulate Matter:                        | g          |             | 0.0410    | 0.0482    | 0.0500    | 0.0464  |
| Metered Volume:  | dscf       |             | 34.837    | 35.371    | 37.961    | 36.056  |
| Gas Stream Volumetric Flowrate:                        | dscfm      |             | 130,858   | 134,438   | 141,930   | 135,742 |
| Oxygen:  | %V, dry    |             | 7.2       | 6.0       | 8.0       | 7.1     |
| Carbon Dioxide:  | %V, dry    |             | 12.0      | 13.0      | 12.0      | 12.3    |
| <b>Total Solid Particulate (TSP) Matter Emissions:</b> |            |             |           |           |           |         |
| TSP Concentration:                                     | gr/dscf    |             | 0.01816   | 0.02103   | 0.02033   | 0.01984 |
| TSP Mass Emission Rate:                                | lb/hr      |             | 20.372    | 24.233    | 24.728    | 23.111  |
| TSP Mass Emission Rate:                                | grams/dscm |             | 0.0416    | 0.0481    | 0.0465    | 0.0454  |
| TSP Mass Emission Rate @ 8% O2:                        | grams/dscm |             | 0.0391    | 0.0417    | 0.0465    | 0.0424  |

**SUMMARY OF EMISSIONS SAMPLING DATA**

| Plant:  | Rayonier  | Location:                             | SRB Stack | Run #       | 1           | 2           | 3     | AVERAGE   |
|---|-----------|---------------------------------------|-----------|-------------|-------------|-------------|-------|-----------|
| Condition:                                      | Normal    | Date                                  | 14-May-08 | 16-May-08   | 16-May-08   |             |       |           |
| Unit:   | SRB Stack | Method:                               | Method 5  | Start Time  | 18:10       | 8:20        | 12:40 |           |
| Parameter                                       |           | Units                                 |           | Stop Time   | 17:12       | 9:21        | 13:42 |           |
| Sampling Time                                   |           | min                                   |           |             | 60          | 60          | 60    | 60        |
| <b>AMBIENT DATA:</b>                            |           |                                       |           |             |             |             |       |           |
| Ambient Temperature                             |           | deg F                                 |           | 69          | 70          | 70          |       | 69.67     |
| Location Height above Pbar reading              |           | feet                                  |           | 214         | 214         | 214         |       | 214       |
| Barometric Pressure                             |           | in. Hg                                |           | 30.06       | 29.98       | 29.98       |       | 30.01     |
| Corrected Barometric Pressure (to location)     |           | in. Hg                                |           | 29.85       | 29.77       | 29.77       |       | 29.79     |
| <b>GAS METER DATA:</b>                          |           |                                       |           |             |             |             |       |           |
| Dry Gas Meter Correction Factor (gamma)         |           | Dimensionless                         |           | 0.9754      | 0.9754      | 0.9754      |       | 0.9754    |
| Average Meter Differential Pressure             |           | in. H <sub>2</sub> O                  |           | 1.1983      | 1.2833      | 2.5583      |       | 1.6800    |
| Absolute Meter Pressure                         |           | in. Hg                                |           | 29.93       | 29.86       | 29.95       |       | 29.92     |
| Average Meter Temperature                       |           | degrees F                             |           | 75.7        | 76.0        | 78.9        |       | 76.9      |
| Metered Dry Sample Gas Volume                   |           | dcf                                   |           | 36.220      | 36.889      | 39.678      |       | 37.596    |
| Average Sampling Rate                           |           | dscfm                                 |           | 0.581       | 0.590       | 0.633       |       | 0.601     |
| Standard Metered Volume                         |           | dscf                                  |           | 34.837      | 35.371      | 37.961      |       | 36.056    |
| Standard Metered Volume                         |           | dscm                                  |           | 0.9666      | 1.0017      | 1.0751      |       | 1.0211    |
| <b>MOISTURE DATA:</b>                           |           |                                       |           |             |             |             |       |           |
| Moisture Determination Technique                |           |                                       |           | Gravimetric | Gravimetric | Gravimetric |       |           |
| Relative Humidity                               |           | %RH                                   |           | #N/A        | #N/A        | #N/A        |       | #N/A      |
| Saturated Vapor Pressure of Water               |           | inches Hg                             |           | 2.4313      | 2.6079      | 2.9178      |       | 2.6523    |
| Vapor Phase Moisture Content at Saturation      |           | % Volume                              |           | 8.16        | 8.78        | 9.82        |       | 8.92      |
| Total Condensate Collected                      |           | grams H <sub>2</sub> O                |           | 78.1        | 81.2        | 99.6        |       | 86.30     |
| Standard Volume of Water Vapor                  |           | scf                                   |           | 3.682       | 3.829       | 4.696       |       | 4.069     |
| Measured Moisture Content                       |           | mole fraction                         |           | 0.0956      | 0.0977      | 0.1101      |       | 0.1011    |
| Measured Moisture Content                       |           | % Volume                              |           | 9.56        | 9.77        | 11.01       |       | 10.11     |
| Gas Stream Vapor Phase Moisture (Bs)            |           | % Volume                              |           | 8.16        | 8.78        | 9.82        |       | 8.92      |
| <b>FIXED GAS DATA:</b>                          |           |                                       |           |             |             |             |       |           |
| Oxygen Concentration, Dry Basis                 |           | % Volume                              |           | 7.2         | 8.0         | 8.0         |       | 7.1       |
| Carbon Dioxide Concentration, Dry Basis         |           | % Volume                              |           | 12.0        | 13.0        | 12.0        |       | 12.3      |
| Carbon Monoxide Concentration, Dry Basis        |           | % Volume                              |           | 0.0         | 0.0         | 0.0         |       | 0.0       |
| Other Primary Gas Constituent, Dry Basis        |           | % Volume                              |           | #N/A        | #N/A        | #N/A        |       | #N/A      |
| Nitrogen Concentration, Dry Basis (gas balance) |           | % Volume                              |           | 80.8        | 81.0        | 80.0        |       | 80.6      |
| Gas Molecular Weight, Dry Basis                 |           | lb/lb-mole                            |           | 30.208      | 30.320      | 30.240      |       | 30.258    |
| Gas Molecular Weight, Wet Basis                 |           | lb/lb-mole                            |           | 29.212      | 29.239      | 29.038      |       | 29.163    |
| Fo Calculated                                   |           | Dimensionless                         |           | 1.142       | 1.146       | 1.075       |       | 1.121     |
| Excess Air                                      |           | %                                     |           | 50.89       | 38.96       | 60.90       |       | 50.25     |
| Ultimate CO <sub>2</sub>                        |           | %V.d                                  |           | 18.31       | 18.23       | 19.44       |       | 18.66     |
| <b>DUCT CONFIGURATION:</b>                      |           |                                       |           |             |             |             |       |           |
| Duct Geometry (C = Circular, R = Rectangular)   |           |                                       |           | C           | C           | C           |       |           |
| Duct Dimensions (Diameter)                      |           | inches                                |           | 88          | 88          | 88          |       | 88        |
| Effective Duct Diameter (De)                    |           | inches                                |           | 88          | 88          | 88          |       | 88        |
| Stack Cross-Sectional Area                      |           | ft <sup>2</sup>                       |           | 42.24       | 42.24       | 42.24       |       | 42.24     |
| <b>DUCT GAS CONDITIONS:</b>                     |           |                                       |           |             |             |             |       |           |
| Static Pressure of Gas Stream                   |           | in. H <sub>2</sub> O                  |           | -0.510      | -0.640      | -0.570      |       | -0.573    |
| Absolute Duct Gas Pressure                      |           | in. Hg                                |           | 29.809      | 29.719      | 29.724      |       | 29.751    |
| Gas Stream Temperature                          |           | degrees F                             |           | 107.75      | 110.17      | 114.08      |       | 110.67    |
| Gas Stream Wet Bulb Temperature                 |           | degrees F                             |           | 0           | 0           | 0           |       | 0         |
| <b>VELOCITY DATA:</b>                           |           |                                       |           |             |             |             |       |           |
| Pitot Tube Coefficient                          |           | Dimensionless                         |           | 0.84        | 0.84        | 0.84        |       | 0.84      |
| Avg. Square Root of Velocity Head               |           | (in. H <sub>2</sub> O) <sup>0.5</sup> |           | 1.0465      | 1.0868      | 1.1605      |       | 1.0979    |
| Gas Stream Velocity                             |           | ft/sec                                |           | 60.681      | 63.221      | 67.966      |       | 63.956    |
| Gas Stream Velocity                             |           | ft/min                                |           | 3640.86     | 3793.26     | 4077.98     |       | 3837.37   |
| Gas Stream Velocity                             |           | meters/min                            |           | 1109.73     | 1156.19     | 1242.97     |       | 1169.63   |
| Gas Stream Velocity                             |           | mi/hr                                 |           | 41.376      | 43.108      | 46.343      |       | 43.609    |
| <b>FLOWRATE/ENGLISH UNITS</b>                   |           |                                       |           |             |             |             |       |           |
| Actual Volumetric Flow Rate, Wet Basis          |           | acfm                                  |           | 153778.9    | 160215.9    | 172241.7    |       | 162078.8  |
| Standard Volumetric Flow Rate, Wet Basis        |           | scfm                                  |           | 142479.4    | 147370.1    | 157378.1    |       | 149075.9  |
| Standard Volumetric Flow Rate, Dry Basis        |           | dscfm                                 |           | 130858.3    | 134437.9    | 141929.6    |       | 135741.9  |
| Standard Volumetric Flow Rate, Wet Basis        |           | kscfh                                 |           | 8548.76     | 8842.21     | 9442.68     |       | 8944.55   |
| Standard Volumetric Flow Rate, Dry Basis        |           | kdscfh                                |           | 7851.50     | 8066.27     | 8515.77     |       | 8144.51   |
| Total Mass Flow Rate (wet)                      |           | kpph                                  |           | 648.14      | 671.00      | 711.66      |       | 676.93    |
| <b>FLOWRATE/METRIC UNITS</b>                    |           |                                       |           |             |             |             |       |           |
| Actual Volumetric Flow Rate, Wet Basis          |           | acmm                                  |           | 4355.02     | 4537.31     | 4877.89     |       | 4590.07   |
| Standard Volumetric Flow Rate, Wet Basis        |           | scmm                                  |           | 4035.02     | 4173.52     | 4458.95     |       | 4221.83   |
| Standard Volumetric Flow Rate, Dry Basis        |           | dscmm                                 |           | 3705.91     | 3807.28     | 4019.44     |       | 3844.21   |
| <b>ISOKINETIC SAMPLING DATA:</b>                |           |                                       |           |             |             |             |       |           |
| Nozzle Diameter                                 |           | inches                                |           | 0.189       | 0.189       | 0.189       |       | 0.189     |
| Area of Nozzle                                  |           | ft <sup>2</sup>                       |           | 1.948E-04   | 1.948E-04   | 1.948E-04   |       | 1.948E-04 |
| Isokinetic Sampling Rate                        |           | %I                                    |           | 96.2        | 95.1        | 96.7        |       | 96.0      |
| <b>PARTICULATE MATTER:</b>                      |           |                                       |           |             |             |             |       |           |
| Particulate Matter Collected                    |           | grams                                 |           | 0.0410      | 0.0482      | 0.0500      |       | 0.0464    |
| Particulate Matter Concentration                |           | grams/dscm                            |           | 0.04156     | 0.04812     | 0.04851     |       | 0.04539   |
| Particulate Matter Mass Emission Rate           |           | grams/sec                             |           | 2.567       | 3.053       | 3.116       |       | 2.912     |
| Particulate Matter Concentration                |           | lb/dscf                               |           | 2.59E-06    | 3.00E-06    | 2.90E-06    |       | 2.83E-06  |
| Particulate Matter Concentration                |           | grains/dscf                           |           | 0.01816     | 0.02103     | 0.02033     |       | 0.01984   |
| Particulate Matter Mass Emission Rate           |           | lb/hr                                 |           | 20.372      | 24.233      | 24.728      |       | 23.111    |

STACS ISOKINETIC SAMPLING FIELD DATA SHEET

| Facility:             | Rayonier |  | Meter #:                           | A-4                                |                | Baro. Press:   | 30.06             |                   | Page #:            |            |             |
|-----------------------|----------|--|------------------------------------|------------------------------------|----------------|--|-------------------|-------------------|--------------------|------------|-------------|
| Unit:                 | SRB      |  | DH@:                               | 1.9                                |                | Ambient Temp:  | 69                |                   | Pitot LC:          |            |             |
| Location:             |          |  | DGM Factor:                        | 0.9754                             |                | Nozzle Dia:  | 0.189             |                   |                    |            |             |
| Test Type:            | MS       |  | Pitot #:                           |                                    |                | Static P:  | -0.51             |                   |                    |            |             |
| Run #:                | Eng 1    |  | Pitot Coef:                        | 0.84                               |                | Stack Dimensions:  | 88"               |                   |                    |            |             |
| Condition:            |          |  |                                    |                                    | Stack Height:  |  |                   |                   |                    |            |             |
| Operator(s):          | KLC      |  | K-Factor:                          | 1.1                                |                | Init. Leak Check:  | 0.002 cm @ 15" Hg |                   |                    |            |             |
| Date:                 | 5/14/08  |  | Filter#:                           | 722                                |                | Final Leak Check:  | 0.001 cm @ 10" Hg |                   |                    |            |             |
| Traverse Point Number | Time     | Gas Meter Reading Vm(ft <sup>3</sup> ) | Velocity Head (ftH <sub>2</sub> O) | Orifice Press (ftH <sub>2</sub> O) | Stack Temp (F) | Probe Temp (F)   | Filter Temp (F)   | Impinger Temp (F) | Dry Gas Meter Temp |            | Vacuum (Hg) |
|                       |          |  |                                    |                                    |                |  |                   |                   | Inlet (F)          | Outlet (F) |             |
| B-1                   | 1610/0   | 678.326                                | 1.3                                | 1.4                                | 107            | 236  | 252               | 65                | 73                 | 73         | 4           |
| 2                     | 5        | 681.71                                 | 1.2                                | 1.3                                | 111            | 240  | 254               | 57                | 75                 | 72         | 4           |
| 3                     | 10       | 684.79                                 | 1.2                                | 1.3                                | 107            | 252  | 258               | 58                | 76                 | 72         | 4           |
| 4                     | 15       | 687.85                                 | 1.1                                | 1.2                                | 108            | 250  | 250               | 58                | 78                 | 73         | 4           |
| 5                     | 20       | 690.84                                 | 0.99                               | 1.1                                | 108            | 253  | 261               | 58                | 79                 | 73         | 4           |
| 6                     | 25       | 693.72                                 | 1.0                                | 1.1                                | 106            | 251  | 246               | 58                | 79                 | 73         | 4           |
| A-1                   | 1642/30  | 696.589                                | 0.80                               | 0.88                               | 107            | 243  | 256               | 58                | 79                 | 73         | 4           |
| 2                     | 35       | 699.2                                  | 1.1                                | 1.2                                | 102            | 251  | 248               | 58                | 79                 | 73         | 4           |
| 3                     | 40       | 702.35                                 | 1.1                                | 1.2                                | 108            | 248  | 252               | 58                | 80                 | 73         | 4           |
| 4                     | 45       | 705.40                                 | 1.2                                | 1.3                                | 108            | 243  | 235               | 58                | 80                 | 73         | 4           |
| 5                     | 50       | 708.52                                 | 1.2                                | 1.3                                | 108            | 230  | 250               | 59                | 81                 | 74         | 4           |
| 6                     | 55       | 711.67                                 | 1.0                                | 1.1                                | 108            | 232  | 234               | 60                | 81                 | 75         | 4           |
|                       | 1712/60  | 714.546                                |                                    |                                    |                |  |                   |                   |                    |            |             |
| Avg/Tot.              |          |  |                                    |                                    |                |  |                   |                   |                    |            |             |
| Impinger              | 1        | 2                                      | 3                                  | 4                                  | 5              | Total Traverse Point %'s   |                   |                   |                    |            |             |
| Final                 | 165      | 104                                    |                                    | 209                                |                | 6 Point (4.4) (14.6) (29.6) (70.4) (85.4) (95.6)   |                   |                   |                    |            |             |
| Initial               | 100      | 100                                    |                                    | 196.9                              |                | 12 Point (2.1) (6.7) (11.8) (17.7) (25.0) (35.6) (64.4) (75.0) (82.3) (88.2) (93.3) (97.9)   |                   |                   |                    |            |             |
| Total                 | 65       | 4                                      |                                    | 9.1                                | 78.1           | Note: Nearest upstream disturbance or exit must be 2 duct diameters away and nearest downstream disturbance must be at least 8 diameter away to use 6 points per traverse. |                   |                   |                    |            |             |
| ORSAT/CEM             | 1        | 2                                      | 3                                  | 4                                  |                |  |                   |                   |                    |            |             |
| O2                    | 7.2      |  |                                    |                                    |                |  |                   |                   |                    |            |             |
| CO2                   | 12.0     |  |                                    |                                    |                |  |                   |                   |                    |            |             |

19.9 lbs/hr

STACS ISOKINETIC SAMPLING FIELD DATA SHEET

| Facility:             | Royamer             |  | Meter #:                          | A-4                                |                | Baro. Press:   | 29.98           |                   | Page #:             |            |              |   |  |  |  |  |  |
|-----------------------|---------------------|--|-----------------------------------|------------------------------------|----------------|--|-----------------|-------------------|---------------------|------------|--------------|---|--|--|--|--|--|
| Unit:                 | SRB                 |  | DH@:                              | 1.9                                |                | Ambient Temp:  | 70              |                   | Pitot LC:           | ✓          |              |   |  |  |  |  |  |
| Location:             | Fernandina Beach FL |  | DGM Factor:                       | 0.9754                             |                | Nozzle Dia:  | 0.187           |                   |                     |            |              |   |  |  |  |  |  |
| Test Type:            | MS                  |  | Pitot #:                          |                                    |                | Static P:  | -0.59           |                   |                     |            |              |   |  |  |  |  |  |
| Run #:                | Eng 2               |  | Pitot Coef:                       | 0.84                               |                | Stack Dimensions:  | 88"             |                   |                     |            |              |   |  |  |  |  |  |
| Condition:            |                     |  |                                   |                                    |                | Stack Height:  |                 |                   |                     |            |              |   |  |  |  |  |  |
| Operator(s):          | KIC                 |  | K-Factor:                         | 1.1                                |                | Init Leak Check:   | 0.004 cfm@ 15   |                   | "                   |            | Hg           |   |  |  |  |  |  |
| Date:                 | 5/16/08             |  | Filter#:                          | SRB-1                              |                | Final Leak Check:  | cfm@            |                   | "                   |            | Hg           |   |  |  |  |  |  |
| Traverse Point Number | Time                | Gas Meter Reading Vm(ft <sup>3</sup> ) | Velocity Head ("H <sub>2</sub> O) | Orifice Press. ("H <sub>2</sub> O) | Stack Temp (F) | Probe Temp (F)   | Filter Temp (F) | Impinger Temp (F) | Dry Gas Meter Temp. |            | Vacuum ("Hg) |   |  |  |  |  |  |
|                       |                     |  |                                   |                                    |                |  |                 |                   | Inlet (F)           | Outlet (F) |              |   |  |  |  |  |  |
| A-1                   | 0820/0              | 828.69                                 | 1.2                               | 1.3                                | 109            | 260  | 257             | 66                | 74                  | 73         | 3            |   |  |  |  |  |  |
| 2                     | 5                   | 831.82                                 | 1.2                               | 1.3                                | 110            | 261  | 262             | 50                | 74                  | 70         | 3            |   |  |  |  |  |  |
| 3                     | 10                  | 834.51                                 | 1.3                               | 1.4                                | 110            | 259  | 257             | 53                | 76                  | 71         | 24           |   |  |  |  |  |  |
| 4                     | 15                  | 838.11                                 | 1.2                               | 1.3                                | 110            | 260  | 261             | 55                | 79                  | 72         | 4            |   |  |  |  |  |  |
| 5                     | 20                  | 841.19                                 | 1.2                               | 1.3                                | 110            | 255  | 250             | 56                | 81                  | 71         | 3            |   |  |  |  |  |  |
| 6                     | 25                  | 844.26                                 | 1.0                               | 1.1                                | 110            | 254  | 250             | 57                | 81                  | 72         | 3            |   |  |  |  |  |  |
| B-1                   | 0851/30             | 847.094                                | 1.2                               | 1.3                                | 111            | 256  | 254             | 61                | 80                  | 73         | 3            |   |  |  |  |  |  |
| 2                     | 35                  | 850.30                                 | 1.3                               | 1.4                                | 109            | 256  | 243             | 56                | 83                  | 73         | 3            |   |  |  |  |  |  |
| 3                     | 40                  | 853.48                                 | 1.3                               | 1.4                                | 109            | 245  | 243             | 57                | 83                  | 73         | 3            |   |  |  |  |  |  |
| 4                     | 45                  | 856.65                                 | 1.2                               | 1.3                                | 109            | 246  | 253             | 58                | 81                  | 75         | 3            |   |  |  |  |  |  |
| 5                     | 50                  | 859.72                                 | 1.1                               | 1.2                                | 114            | 247  | 255             | 58                | 81                  | 74         | 3            |   |  |  |  |  |  |
| 6                     | 55                  | 862.65                                 | 1.0                               | 1.1                                | 111            | 247  | 258             | 58                | 81                  | 74         | 3            |   |  |  |  |  |  |
|                       | 0921/60             | 865.518                                |                                   |                                    |                |  |                 |                   |                     |            |              |   |  |  |  |  |  |
| Avg/Tot.              |                     |  |                                   |                                    |                |  |                 |                   |                     |            |              |   |  |  |  |  |  |
| Impinger              | 1                   | 2                                      | 3                                 | 4                                  | 5              | Total  |                 |                   |                     |            |              | Traverse Point %'s:   |  |  |  |  |  |
| Final                 | 162                 | 110                                    |                                   | 2075                               |                | 6 Point (4.4) (14.6) (29.6) (70.4) (85.4) (95.6)   |                 |                   |                     |            |              | 12 Point (2.1)(6.7)(11.8)(17.7)(25.0)(35.8)(64.4)(75.0)(82.3)(88.2)(93.3)(97.9) |  |  |  |  |  |
| Initial               | 100                 | 100                                    |                                   | 198.3                              |                | Note: Nearest upstream disturbance or exit must be 2 duct diameters away and nearest downstream disturbance must be at least 8 diameter away to use 6 points per traverse. |                 |                   |                     |            |              |   |  |  |  |  |  |
| Total                 | 62                  | 10                                     |                                   |                                    |                |  |                 |                   |                     |            |              |   |  |  |  |  |  |
| ORSAT/CEM             | 1                   | 2                                      | 3                                 | 4                                  |                |  |                 |                   |                     |            |              |   |  |  |  |  |  |
| O2                    | 6.0                 |  |                                   |                                    |                |  |                 |                   |                     |            |              |   |  |  |  |  |  |
| CO2                   | 13.0                |  |                                   |                                    |                |  |                 |                   |                     |            |              |   |  |  |  |  |  |

**STACS ISOKINETIC SAMPLING FIELD DATA SHEET**

|              |                     |             |        |                   |               |           |   |
|--------------|---------------------|-------------|--------|-------------------|---------------|-----------|---|
| Facility:    | Rogovier            | Meter #:    | A-4    | Baro. Press:      |               | Page #:   |   |
| Unit:        | SRB                 | DH@:        | 1.9    | Ambient Temp:     | 70            | Pitot LC: | ✓ |
| Location:    | Fernandina Beach Fl | DGM Factor: | 0.9754 | Nozzle Dia:       | 0.189         |           |   |
| Test Type:   | MS                  | Pitot #:    |        | Static P:         | -0.57         |           |   |
| Run #:       | Eng 3               | Pitot Coef: | 0.84   | Stack Dimensions: |               |           |   |
| Condition:   |                     |             |        | Stack Height:     |               |           |   |
| Operator(s): | KK                  | K-Factor:   | 1.1    | Init. Leak Check: | 0.002 cfm@ 15 | "Hg       |   |
| Date:        | 5/16/08             | Filter#:    | SRB-3  | Final Leak Check: | 0.007 cfm@ 7  | "Hg       |   |

| Traverse Point Number | Time    | Gas Meter Reading Vm(ft3) | Velocity Head (H2O) | Orifice Press. (H2O) | Stack Temp (F) | Probe Temp (F) | Filter Temp (F) | Impinger Temp (F) | Dry Gas Meter Temp. |            | Vacuum (Hg) |
|-----------------------|---------|---------------------------|---------------------|----------------------|----------------|----------------|-----------------|-------------------|---------------------|------------|-------------|
|                       |         |                           |                     |                      |                |                |                 |                   | Inlet (F)           | Outlet (F) |             |
| A-1                   | 1240/0  | 878.487                   | 1.4                 | 1.54                 | 112            | 256            | 254             | 55                | 73                  | 73         | 4           |
| 2                     | 5       | 882.15                    | 1.4                 | 1.54                 | 112            | 255            | 257             | 55                | 74                  | 73         | 4           |
| 3                     | 10      | 885.65                    | 1.4                 | 1.54                 | 114            | 253            | 253             | 56                | 77                  | 77         | 4           |
| 4                     | 15      | 889.00                    | 1.4                 | 1.54                 | 115            | 252            | 257             | 56                | 78                  | 77         | 4           |
| 5                     | 20      | 892.37                    | 1.3                 | 1.4                  | 113            | 255            | 251             | 57                | 79                  | 74         | 4           |
| 6                     | 25      | 895.56                    | 1.3                 | 1.4                  | 114            | 252            | 255             | 58                | 80                  | 74         | 4           |
| B-1                   | 1312/30 | 898.524                   | 1.4                 | 1.54                 | 115            | 240            | 257             | 63                | 82                  | 75         | 4           |
| 2                     | 35      | 901.92                    | 1.5                 | 1.65                 | 115            | 250            | 262             | 57                | 84                  | 78         | 4           |
| 3                     | 40      | 905.44                    | 1.5                 | 1.65                 | 114            | 255            | 256             | 57                | 86                  | 80         | 4           |
| 4                     | 45      | 908.86                    | 1.3                 | 1.4                  | 114            | 248            | 257             | 58                | 87                  | 81         | 4           |
| 5                     | 50      | 912.09                    | 1.3                 | 1.4                  | 116            | 242            | 250             | 59                | 87                  | 81         | 4           |
| 6                     | 55      | 915.29                    | 1.0                 | 1.1                  | 115            | 240            | 255             | 60                | 88                  | 82         | 4           |
|                       | 1342/60 | 918.165                   |                     |                      |                |                |                 |                   |                     |            |             |

|           |      |   |   |       |   |                           |  |  |  |  |  |
|-----------|------|---|---|-------|---|---------------------------|--|--|--|--|--|
| Avg/Tot.  |      |   |   |       |   |                           |  |  |  |  |  |
| Impinger  | 1    | 2   | 3 | 4     | 5   | Total: Traverse Point %'s |  |  |  |  |  |
| Final     | 190  | 100   | 0 | 220.3 | 6 Point (4.4)(14.6)(29.6)(70.4)(85.4)(95.6)                                     |                           |  |  |  |  |  |
| Initial   | 100  | 100   | 0 | 210.7 | 12 Point (2.1)(6.7)(11.0)(17.7)(25.0)(35.6)(64.4)(75.0)(82.3)(88.2)(93.3)(97.9) |                           |  |  |  |  |  |
| Total     | 90   | Note: Nearest upstream disturbance or exit must be 2 duct diameters away and nearest downstream disturbance must be at least 8 diameters away to use 6 points per traverse. |   |       |   |                           |  |  |  |  |  |
| ORSAT/CEM | 1    | 2   | 3 | 4     |   |                           |  |  |  |  |  |
| O2        | 8.0  |   |   |       |   |                           |  |  |  |  |  |
| CO2       | 12.0 |   |   |       |   |                           |  |  |  |  |  |





Source Testing And Consulting Services  
Meter Box Calibration

Calibration Date: 1-15-08      Orifice ID    Y Calibration    Delta H @ Cal.    Vac  
 Meter Box: A-4                      40                pass                pass                pass  
 Technician: MLH                      48                pass                pass                pass  
    55                pass                pass                pass  
    63                pass                pass                pass  
    73                pass                pass                pass

| PART 1: Orifice Calibration            |       |                        |                                |                                      |                       |                        |                     |                      |                  |          |     |
|--|-------|------------------------|--------------------------------|--------------------------------------|-----------------------|------------------------|---------------------|----------------------|------------------|----------|-----|
| Calibration Orifice Set: D1            |       |                        |                                |                                      |                       | Critical Vacuum: 13.9  |                     |                      |                  |          |     |
| Barometric Pressure ( in. Hg ): 29.690 |       |                        |                                |                                      |                       |                        |                     |                      |                  |          |     |
| Collected Data                         |       |                        |                                |                                      |                       |                        |                     |                      |                  |          |     |
| Orifice ID                             | Run # | Delta H                | Initial Meter Volume ( cu ft ) | Final Meter Volume ( cu ft )         | Init Meter Temp ( F ) | Final Meter Temp ( F ) | Init Amb Temp ( F ) | Final Amb Temp ( F ) | Run Time min sec | K Factor | Vac |
| 40                                     | 1     | 0.30                   | 980.300                        | 986.931                              | 63.00                 | 62.00                  | 60.00               | 61.00                | 21   12          | 0.2361   | 26  |
| 40                                     | 2     | 0.30                   | 986.931                        | 991.937                              | 61.00                 | 62.00                  | 61.00               | 63.00                | 16   0           | 0.2361   | 26  |
| 48                                     | 1     | 0.66                   | 938.492                        | 945.335                              | 60.00                 | 61.00                  | 62.00               | 61.00                | 15   0           | 0.3431   | 25  |
| 48                                     | 2     | 0.66                   | 945.335                        | 950.883                              | 61.00                 | 62.00                  | 61.00               | 63.00                | 12   12          | 0.3431   | 25  |
| 55                                     | 1     | 1.20                   | 967.473                        | 974.207                              | 63.00                 | 64.00                  | 62.00               | 61.00                | 11   12          | 0.453    | 23  |
| 55                                     | 2     | 1.20                   | 974.207                        | 979.914                              | 63.00                 | 64.00                  | 62.00               | 61.00                | 9   30           | 0.453    | 23  |
| 63                                     | 1     | 2.00                   | 953.728                        | 961.728                              | 62.00                 | 63.00                  | 63.00               | 62.00                | 10   18          | 0.5875   | 22  |
| 63                                     | 2     | 2.00                   | 961.728                        | 967.024                              | 63.00                 | 63.00                  | 62.00               | 62.00                | 6   48           | 0.5875   | 22  |
| 73                                     | 1     | 3.70                   | 992.705                        | 999.101                              | 62.00                 | 63.00                  | 63.00               | 63.00                | 6   0            | 0.8106   | 19  |
| 73                                     | 2     | 3.70                   | 999.101                        | 1005.515                             | 63.00                 | 64.00                  | 63.00               | 63.00                | 6   0            | 0.8106   | 19  |
| Calculated Data                        |       |                        |                                |                                      |                       |                        |                     |                      |                  |          |     |
| Orifice ID                             | Run # | Meter Volume ( cu ft ) | Meter Volume ( std cu ft )     | Corrected Meter Volume ( std cu ft ) | Ave Meter Temp ( F )  | Ave Amb Temp ( F )     | Y                   | Delta H @            |                  |          |     |
| 40                                     | 1     | 6.631                  | 6.65157                        | 6.51376                              | 62.5                  | 60.5                   | 0.9793              | 1.7951               |                  |          |     |
| 40                                     | 2     | 5.006                  | 5.03116                        | 4.90898                              | 61.5                  | 62                     | 0.9757              | 1.8037               |                  |          |     |
| AVE                                    |       |                        |                                |                                      |                       |                        | 0.9775              | 1.7994               |                  |          |     |
| 48                                     | 1     | 6.843                  | 6.89674                        | 6.69106                              | 60.5                  | 61.5                   | 0.9702              | 1.8842               |                  |          |     |
| 48                                     | 2     | 5.548                  | 5.58085                        | 5.43946                              | 61.5                  | 62                     | 0.9747              | 1.8824               |                  |          |     |
| AVE                                    |       |                        |                                |                                      |                       |                        | 0.9724              | 1.8833               |                  |          |     |
| 55                                     | 1     | 6.734                  | 6.75700                        | 6.59628                              | 63.5                  | 61.5                   | 0.9762              | 1.9592               |                  |          |     |
| 55                                     | 2     | 5.707                  | 5.72649                        | 5.59506                              | 63.5                  | 61.5                   | 0.9770              | 1.9592               |                  |          |     |
| AVE                                    |       |                        |                                |                                      |                       |                        | 0.9766              | 1.9592               |                  |          |     |
| 63                                     | 1     | 8                      | 8.05858                        | 7.85981                              | 62.5                  | 62.5                   | 0.9753              | 1.9565               |                  |          |     |
| 63                                     | 2     | 5.296                  | 5.32968                        | 5.19149                              | 63                    | 62                     | 0.9741              | 1.9528               |                  |          |     |
| AVE                                    |       |                        |                                |                                      |                       |                        | 0.9747              | 1.9546               |                  |          |     |
| 73                                     | 1     | 6.396                  | 6.46982                        | 6.31418                              | 62.5                  | 63                     | 0.9759              | 1.9191               |                  |          |     |
| 73                                     | 2     | 6.414                  | 6.47564                        | 6.31418                              | 63.5                  | 63                     | 0.9751              | 1.9155               |                  |          |     |
| AVE                                    |       |                        |                                |                                      |                       |                        | 0.9755              | 1.9173               |                  |          |     |
| Average for All Runs                   |       |                        |                                |                                      |                       |                        |                     | 0.9754               | 1.9028           |          |     |

Source Testing And Consulting Services  
Meter Box Calibration

Calibration Date: 1-15-08  
 Meter Box: A-4  
 Technician: MLH

PART 2: Thermocouple Calibration  
 T/C Calibrator Make: Tegam      T/C Calibrator Model: 840A

| Calibrator Output ( F ) | Meter Reading ( F ) | Error ( F ) | ( Allowable Error ( F ) | Result |
|-------------------------|---------------------|-------------|-------------------------|--------|
| 25.0                    | 24                  | -1          | 9.24                    | pass   |
| 68.0                    | 66                  | -2          | 9.88                    | pass   |
| 222.0                   | 222                 | 0           | 10.64                   | pass   |
| 406.0                   | 405                 | -1          | 11.24                   | pass   |
| 799.0                   | 800                 | 1           | 13.24                   | pass   |
| 1194.0                  | 1205                | 11          | 19.24                   | pass   |
| 1585.0                  | 1592                | 7           | 33.24                   | pass   |
| 1981.0                  | 1960                | -21         | 49.24                   | pass   |

**POST TEST METER CALIBRATION DATA - EMC APPROVED ALTERNATIVE METHOD (ALT - 009)**

| <b>Plant:</b>   | Rayonier  | <b>Location:</b> | SRB Stack     | <b>Run #</b>       | 1             | 2             | 3             | <b>AVERAGE</b> |
|---|-----------|------------------|---------------|--------------------|---------------|---------------|---------------|----------------|
| <b>Condition:</b>   | Normal    | <b>Meter #:</b>  | A-4           | <b>Date:</b>       | 5/14/08       | 5/14/08       | 5/14/08       |                |
| <b>Unit:</b>  | SRB Stack | <b>Method:</b>   | Method 5      | <b>Start Time:</b> | 9:30          | 11:45         | 13:15         |                |
| <b>Parameter</b>  |           |                  |               | <b>Stop Time:</b>  | 10:32         | 12:48         | 14:17         |                |
| <b>Sampling Time</b>  |           |                  | <b>Units</b>  |                    | 60.00         | 60.00         | 60.00         | <b>60.0</b>    |
| <b>GAS METER DATA:</b>  |           |                  |               |                    |               |               |               |                |
| Average Meter Differential Pressure                               |           |                  | in. H2O       |                    | 1.26          | 1.40          | 1.22          | <b>1.29</b>    |
| Absolute Meter Pressure   |           |                  | in. Hg        |                    | 29.95         | 29.96         | 29.95         | <b>29.95</b>   |
| Average Meter Temperature   |           |                  | degrees F     |                    | 76.75         | 76.75         | 79.83         | <b>77.78</b>   |
| Metered Dry Sample Gas Volume                                     |           |                  | dcf           |                    | 36.236        | 35.24         | 35.951        | <b>35.81</b>   |
| Gas Molecular Weight, Dry Basis                                   |           |                  | lb/lb-mole    |                    | 30.41         | 30.36         | 30.20         | <b>30.32</b>   |
| <b>Pre Test Calibration Factors</b>                               |           |                  |               |                    |               |               |               |                |
| DeltaH@   |           |                  | in. H2O       |                    | 1.9           | 1.9           | 1.9           | <b>1.900</b>   |
| Dry Gas Meter Correction Factor (gamma)                           |           |                  | Dimensionless |                    | 0.9754        | 0.9754        | 0.9754        | <b>0.9754</b>  |
| <b>Post Test Data</b>   |           |                  |               |                    |               |               |               |                |
| Calculated Meter Correction Factor (Yqa)                          |           |                  | Dimensionless |                    | <b>0.9941</b> | <b>1.0798</b> | <b>0.9938</b> | <b>1.0226</b>  |
| Difference (Post Test and Pretest Y - Maximum Average Allowed 5%) |           |                  | %             |                    | <b>1.91%</b>  | <b>10.70%</b> | <b>1.89%</b>  | <b>4.83%</b>   |

**Recovery Boiler Compliance Test**

Date: 14-May-08

From SRB gas sampling worksheets

Run: # Eng 1

|                                  | Start of Test |     | End of Test  |     | Difference | %of hour     |
|----------------------------------|---------------|-----|--------------|-----|------------|--------------|
|                                  | hour          | min | hour         | min |            |              |
| Time                             | 16            | 07  | 17           | 11  | 64         | 0.9375       |
| "B" Liquor Flow, gallons         | 106684.4      |     | 119132.1     |     | 12447.7    | 11669.72 gph |
| Liquor Flow, gpm meter           | 195           |     | 198          |     | 196.5      | 11790 gph    |
| Liquor Temperature, deg F        | 197           |     | 197          |     | 197        |              |
| Liquor Hydrometer Reading        | 1.25          |     | 1.25         |     | 1.25       |              |
| Liquor solids, % OD              | 59.8          |     | 59.3         |     | 59.55      |              |
| No. of Liquor guns               | 10            |     | 10           |     | 10         |              |
| No. of oil guns                  | 0             |     | 0            |     | 0          |              |
| No. of oil guns @ pressure       | 0             |     | 0            |     | 0          |              |
| Steam load, lbs/hr chart x 1000  | 395           |     | 394          |     | 394.5      |              |
| Steam Flow Integrator x 1000, lb | 3643.5        |     | 4065.1       |     | 421600     | 395250 lb/hr |
| Steam Temperature, deg F         | 869           |     | 868          |     | 868.5      |              |
| Steam Pressure, psi              | 1006          |     | 999          |     | 1002.5     |              |
| SO2, ppm                         | 242           |     | 258          |     | 250.3715   |              |
| Brinks By-pass Position          | Closed        |     | Closed       |     |            |              |
| Methanol System                  | In Operation  |     | In Operation |     |            |              |

|                         |  |                |       |
|-------------------------|--|----------------|-------|
| Liquor Flow Calculation | (gph)(8.345)(sp.gr.)(%OD)  | 73237.23 lb/hr |       |
|                         | TSP Mass Emission Rate results:  | 19.9 lb/hr     | 20.37 |
|                         | Average PM readout on the Recovery CAM Particulate Monitor:                        | 17.4 mg/m3     | 41.6  |
|                         | * BETA GUARD PARTICULATE MONITOR, MANUFACTURER F., MECHANICAL SYSTEMS INC.         |                | STAC: |
|                         | (End of test value - Start of test value)(60 min /hr / Test time, min.) = Units/hr |                | TEST  |
|                         |  |                | DATA  |

**Recovery Boiler Compliance Test**

Date: 16-May-08

From SRB gas sampling worksheets

Run: # Eng 2

|                                  | Start of Test |     | End of Test  |     | Difference | %of hour       |
|----------------------------------|---------------|-----|--------------|-----|------------|----------------|
|                                  | hour          | min | hour         | min |            |                |
| Time                             | 8             | 19  | 9            | 21  | 62         | 0.967742       |
| "B" Liquor Flow, gallons         | 20205.9       |     | 32434.2      |     | 12228.3    | 11833.84 gph   |
| Liquor Flow, gpm meter           | 198           |     | 202          |     | 200        | 12000 gph      |
| Liquor Temperature, deg F        | 196           |     | 196          |     | 196        |                |
| Liquor Hydrometer Reading        | 1.25          |     | 1.25         |     | 1.25       |                |
| Liquor solids, % OD              | 58.6          |     | 58.6         |     | 58.6       |                |
| No. of Liquor guns               | 10            |     | 10           |     | 10         |                |
| No. of oil guns                  | 0             |     | 0            |     | 0          |                |
| No. of oil guns @ pressure       | 0             |     | 0            |     | 0          |                |
| Steam load, lbs/hr chart x 1000  | 383           |     | 402          |     | 392.5      |                |
| Steam Flow Integrator x 1000, lb | 657.9         |     | 1061.5       |     | 403600     | 390580.6 lb/hr |
| Steam Temperature, deg F         | 862           |     | 866          |     | 864        |                |
| Steam Pressure, psi              | 995           |     | 1001         |     | 998        |                |
| SO2, ppm                         | 315           |     | 249          |     | 282        |                |
| Brinks By-pass Position          | Closed        |     | Closed       |     |            |                |
| Methanol System                  | In Operation  |     | In Operation |     |            |                |

|                         |  |                |       |
|-------------------------|--|----------------|-------|
| Liquor Flow Calculation | (gph)(8.345)(sp.gr.)(%OD)  | 73352.55 lb/hr |       |
|                         | TSP Mass Emission Rate results:  | 24.3 lb/hr     | 24.23 |
|                         | Average PM readout on the Recovery CAM Particulate Monitor <sup>†</sup> :          | 17.8 mg/m3     | 48.1  |
|                         | * BETA GUARD PARTICULATE MONITOR. MANUFACTURER F., MECHANICAL SYSTEMS INC.         |                | STAC  |
|                         | (End of test value - Start of test value)(60 min./hr / Test time, min.) = Units/hr |                | TEST  |
|                         |  |                | DATA  |

### Recovery Boiler Compliance Test

Date: 16-May-08

Run: # Eng 3

|                                  | Start of Test |     | End of Test  |     | Difference | %of hour |       |
|----------------------------------|---------------|-----|--------------|-----|------------|----------|-------|
|                                  | hour          | min | hour         | min |            |          |       |
| Time                             | 12            | 40  | 13           | 42  | 62         | 0.967742 |       |
| "B" Liquor Flow, gallons         | 67772.9       |     | 79625.9      |     | 11853      | 11470.65 | gph   |
| Liquor Flow, gpm meter           | 192           |     | 190          |     | 191        | 11460    | gph   |
| Liquor Temperature, deg F        | 197           |     | 197          |     | 197        |          |       |
| Liquor Hydrometer Reading        | 1.25          |     | 1.25         |     | 1.25       |          |       |
| Liquor solids, % OD              | 60.4          |     | 60.8         |     | 60.6       |          |       |
| No. of Liquor guns               | 10            |     | 10           |     | 10         |          |       |
| No. of oil guns                  | 0             |     | 0            |     | 0          |          |       |
| No. of oil guns @ pressure       | 0             |     | 0            |     | 0          |          |       |
| Steam load, lbs/hr chart x 1000  | 384           |     | 373          |     | 378.5      |          |       |
| Steam Flow Integrator x 1000, lb | 2265          |     | 2658.1       |     | 393100     | 380419.4 | lb/hr |
| Steam Temperature, deg F         | 865           |     | 876          |     | 870.5      |          |       |
| Steam Pressure, psi              | 991           |     | 988          |     | 989.5      |          |       |
| SO2, ppm                         | 101           |     | 127          |     | 114        |          |       |
| Brinks By-pass Position          | Closed        |     | Closed       |     |            |          |       |
| Methanol System                  | In Operation  |     | In Operation |     |            |          |       |

|  |   |                |           |
|--|---|----------------|-----------|
| Liquor Flow Calculation  | (gph)(8.345)(sp.gr.)(%OD)   | 72509.82 lb/hr |           |
|  | TSP Mass Emission Rate results:   | 24.6 lb/hr     | 24.73     |
|  | Average PM readout on the Recovery CAM Particulate Monitor <sup>†</sup> : | 15.5 mg/m3     | 46.5      |
|  | * BETA GUARD PARTICULATE MONITOR, MANUFATURER F., MECHANICAL SYSTEMS INC. |                |           |
| (End of test value - Start of test value)(60 min /hr / Test time, min.) = Units/hr |   |                | TEST DATA |

**Sulfite Recovery Boiler Scrubber Stack Test Analysis**

for 14-May-08

**Steam Output from the Sulfite Recovery Boiler**

| Run     | Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam] |
|---------|---|
| Number  | Sulfite Recovery Boiler                               |
| Eng 1   | 395   |
| Eng 2   | 391   |
| Eng 3   | 380   |
| Average | 389   |

| Oil Input to Boiler                          |          |           |         |                   | Liquor Input to Boiler |                     | Test Result              |                      |
|--|----------|-----------|---------|-------------------|------------------------|---------------------|--------------------------|----------------------|
| Sulfite Recovery Boiler                      |          |           |         |                   | Gal. Liquor            | Liquor Flow lbs/hr. | Particulate              | Particulate          |
| Run Number                                   | Gal. Oil | Test Min. | BTU/gal | MMBTU/hr from Oil |                        |                     | (per Stack test) lbs/hr. | CAM PM Monitor mg/m3 |
| Eng 1  | 0        | 64        | 154,335 | 0                 | 11670                  | 73,237              | 19.9                     | 17.4                 |
| Eng 2  | 0        | 62        | 154,335 | 0                 | 11834                  | 73,353              | 24.3                     | 17.8                 |
| Eng 3  | 0        | 62        | 154,335 | 0                 | 11471                  | 72,510              | 24.6                     | 15.5                 |
| Average                                      | 0        | 63        | 154,335 | 0                 | 11,658                 | 73,033              | 22.9                     |                      |
| Permit Maximum [lbs/hr. SSL]                 |          |           |         |                   | 70,000                 |                     |                          |                      |
| Recovery Boiler Actual Total % of Capacity = |          |           |         |                   | 104%                   |                     |                          |                      |
| Permit Maximum (particulate)                 |          |           |         |                   | 43.18 lbs/hr.          |                     |                          |                      |