

# Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen M. Castille  
Secretary

October 12, 2005

CERTIFIED MAIL – Return Receipt Requested

Mr. F. J. Perrett  
Environmental Manager  
Rayonier Performance Fibers LLC  
Fernandina Beach Mill  
The Foot of Gum Street  
P.O. Box 2002  
Fernandina Beach, Florida 32035

RE: Request to Install the No. 6 Power Boiler and the No. 6 Batch Digester System  
0890004-018-AC

Dear Mr. Perrett:

On September 12, 2005, the Department's Northeast District office received a request to install the No. 6 Power Boiler and the No. 6 batch digester system at the existing sulfite mill located in Fernandina Beach, Nassau County, Florida. The project has been transferred to the Department's Bureau of Air Regulation office located in Tallahassee. Based on our review of the proposed project, we have determined that the application is incomplete and the following additional information is needed in order to continue processing this application package. Please provide all assumptions, calculations, and reference material(s), that are used or reflected in any of your responses to the following issues:

1. The Department disagrees that the projects are unrelated and should be separately reviewed for PSD applicability. You state that the three existing boilers "... are unreliable and require frequent repair." This means that they experience frequent periods of down time during which they are not available. The new boiler project will clearly provide more operation to support the increased production. Nevertheless, based on timing alone and the proposed netting analysis for the boilers, these projects are considered one project for purposes of PSD applicability. As such, include the emissions increases from the production increase with the netting analysis for the boiler project and the total net emissions increase for each affected pollutant will be compared to Table 400-2 for significance. Therefore, please provide an emissions netting analysis that encompasses all of the permitting projects (contemporaneous emission increases and decreases) for the last five years from the date of the application.
2. From the Department's ARMS database, the following air construction permit projects from the last 5 years have been identified.

Project No. 0890004-014-AC: Brinks Bypass AC  
Project No. 0890004-015-AC: Heat Input AC-Power Boilers  
Project No. 0890004-017-AC: Subpart MM/Used Oil

Please provide a description and a summary of the annual emissions increases resulting from each project. These appear to be non-PSD minor source projects. Such projects must be included as contemporaneous emissions increases within the netting analysis. The revised netting analysis must also include increases from the requested production increase.

3. If the emissions netting analysis requested in No. 1, above, reflects that the proposed facility's modification is equal to or greater than the significant emission rate for any pollutant pursuant to Table 400-2 in Chapter 62-212, F.A.C., then a processing fee is required pursuant to Rule 62-4.050, F.A.C., and the requirements of Rule 62-212.400(5), F.A.C., must be addressed and provided.

*"More Protection, Less Process"*

*Printed on recycled paper.*

Mr. F. J. Perrett

Request to Install the No. 6 Power Boiler and the No. 6 Batch Digester System

0890004-018-AC

Page 2 of 3

4. The application indicates that "small amounts" of TDF and used oil fuel will be fired. Please identify the maximum hourly and annual throughputs for these fuels. Identify the hourly and annual emissions of metals associated with firing these fuels. Describe the methods that will be used to handle, store and feed TDF. Identify the procedures that will be used to ensure that the used oils meet the requirements for "on-specifications" used oil.
5. For the new No. 6 batch digester system's (BDS) effects on the mill's proposed production increase, provide the actual and future potential pollutant changes from affected emissions units in the pulping operations, the chemical recovery process operations, the bleach plant operations; and the power and steam production operations for the years 2003 and 2004. Please provide all calculations, emissions factors, assumptions and any reference material. Also, include the results of the analysis in the netting analysis. On page 27 of the rule applicability analysis, the discussion for the recovery boiler references 40 CFR 52.21(b)(41)(ii)(c) as the justification for excluding emissions from the netting analysis. This federal rule has not been adopted by Florida. Please revise accordingly.
6. The recovery boiler operated for 8072 hours for the calendar year 2004 and 7871 hours for the calendar year 2003; and, the production reported was 223,276 TADUP (tons of air dried unbleached pulp) for calendar year 2004 and 223,692 TADUP for calendar year 2003. However, the Annual Operation Report showed that the calculated pollutant emissions for NO<sub>x</sub>, PM/PM<sub>10</sub> and CO were approximately twice as much for the calendar year 2004 than what was reported for the calendar year 2003. With all things being approximately equal, please explain why there is such a large difference in the reported emissions between the two years of operation.
7. The Department does not necessarily agree with the method used to estimate past actual NO<sub>x</sub> emissions. Please provide the emissions data for each of the test runs conducted (lb/MMBtu and lb/hour). Have all test runs been included? Identify the fuel blends and the percentage of each fuel fired during the tests. Identify the annual heat input from each fuel fired during the year. Was the Department's Northeast District Office afforded the opportunity to observe these tests by written notification and/or phone call? How does the method account for the firing of various fuel blends? Were tests also conducted for CO and/or VOC emissions? Identify all emissions tests results (CO, NO<sub>x</sub>, SO<sub>2</sub>, and VOC) conducted for Boilers 1 – 3.
8. The application proposes to convert a 1983 (NSPS: 40 CFR 60, Subpart D) traveling grate, coal-fired boiler to a bubbling fluidized bed boiler firing primarily wood waste. The application suggests that the costs of such a conversion will be less than half of the cost of a new "replacement" boiler.

Since initial construction of the 1983 boiler, identify each subsequent modification, the purpose, and the associated costs.

Please verify the costs provided to convert the existing boiler to a bubbling fluidized bed boiler. The estimate appears low given the extent of work proposed.

Please verify the estimated costs of \$40 million for an equivalent "new" replacement 525 MMBtu/hour unit for this project. The estimate appears high with respect to recent projects. For example, U.S. Sugar recently constructed a new biomass boiler at its Clewiston facility. The 936 MMBtu/hour unit is a membrane wall boiler with balanced draft stoker, overfire air, rotating feeders, and pneumatic spreaders. The system also includes wet cyclone collectors, an electrostatic precipitator (ESP), a urea-based selective non-catalytic reduction (SNCR) system, and CO/NO<sub>x</sub> CEMS. The cost of the boiler system was reported to be approximately \$40 million.

9. Identify the maximum emissions rates for the 1983 boiler as previously permitted. Are the emissions rates proposed for the converted boiler greater than the previously permitted emissions rates?
10. Discuss and compare the emission rates and dispersion characteristics of the existing stacks with the proposed stack.
11. On page 16 of the rule applicability analysis, Table 7 indicates that the steam measurement is not available. What was the problem with this year?

Mr. F. J. Perrett

Request to Install the No. 6 Power Boiler and the No. 6 Batch Digester System

0890004-018-AC

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12. Appendix A identifies the source of the emissions factors used to determine estimated past actual annual emissions. Provide the emissions factors, activity factors, and annual estimates for each boiler. What are the maximum continuous heat input rates and steam production rates for each unit?

13. Identify the scrubber SO<sub>2</sub> removal efficiency used to estimate annual emissions from the existing boilers. What is the basis of the removal efficiency? Has the removal efficiency been determined by stack tests? Identify any stack tests conducted related to SO<sub>2</sub> emission rates.

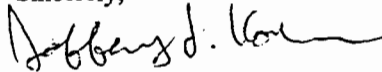
14. Table 13 identifies "baseline" SO<sub>2</sub> emissions from the pulping systems of 65.42 tons/year, which is based on actual emissions from 2000 and 2001. However, new federal regulations implemented more stringent controls for these units. Revise the baseline SO<sub>2</sub> emissions accordingly.

15. Permit No. 0890004-010-AC established a facility-wide pulp production limit of 153,205 ADMT/year. Prior to this limit, was the facility restricted by permit as to production? Prior to the addition of the No. 6 digester, what was the maximum annual production rate (potential) of the facility?

16. Please perform SO<sub>2</sub> NAAQS and PSD Class II increment modeling taking into Rayonier's requested new boiler with its new stack parameters, the lagoon and Rayonier's interaction with Smurfit-Stone's Fernandina Beach Mill. All property boundaries used in this modeling should be based on fence lines or boundaries that are routinely patrolled to prevent access of the public to the property.

The Department will resume processing this application after receipt of the requested information. If you have any questions regarding this matter, please call Bruce Mitchell at (850)413-9198 or Cleve Holladay at (850)921-8986.

Sincerely,



Jeffery F. Koerner, P.E.

Permitting North Administrator  
Bureau of Air Regulation

JFK/bm

cc: Chris Kirts, DEP - NED  
David Tudor, Contact, RPF  
David A. Buff, P.E., GAI

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

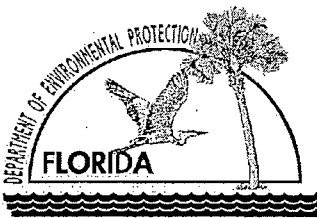
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T  
 Se Mr. F. J. Perrett  
 General Manager  
 St Rayonier, Inc.  
 or Post Office Box 2002  
 Ci Fernandina Beach, FL 32035-2002



BEST AVAILABLE COPY

# Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen Castille  
Secretary

CERTIFIED - RETURN RECEIPT

September 28, 2005

Mr. F.J. Perret, General Manager  
Rayonier Performance Fibers, LLC.  
The Foot of Gum Street  
P.O. Box 2002  
Fernandina Beach, FL 32035-2002

RECEIVED

SEP 30 2005

BUREAU OF AIR REGULATION

Dear Mr. Perret:

Nassau County – Air Permitting  
Rayonier Performance Fibers, LLC. - Fernandina Mill  
0890004-018-AC  
Construction Permit Application

On September 12, 2005 the Northeast District of the Department of Environmental Protection, (NED), received an application for a minor modification. NED transmitted a copy of the application to the Division of Air Resource Management, (DARM), in Tallahassee.

Please find that the following presents a background in relation to discussions that took place between NED and DARM as it relates to the subject application.

The Department's Northeast District received a request for a minor modification to modify the mill by increasing the production capacity from 153,205 ADMT/yr to 175,000 ADMT/yr. On February 5, 2002, the Northeast District issued an air construction permit, No. 0890004-010-AC, for the installation of a new batch digester (No. 6), which would allow the mill to avoid a loss in production while the existing batch digesters (Nos. 1 thru 5) were being rebuilt/rebricked. In this permit, a federally enforceable facility and annual production rate limitation of 153,205 ADMT/yr was placed in the specific conditions, specifically Nos. 3 and 4, respectively; and, the justification for each of these conditions was Rule 62-212.400(2)(g), F.A.C. In Chapter 62-212, F.A.C., this rule is titled "Relaxations of Restrictions on Pollutant Emitting Capacity" and states:

"If a previously permitted facility or modification which would be subject to the preconstruction review requirements of this rule if it were a proposed new facility or modification solely by virtue of a relaxation in any federally enforceable limitation on the capacity of the facility or modification to emit a pollutant (such as a restriction on hours of operation), which limitation was established after August 7, 1980, then at the time of such relaxation the preconstruction review requirements of this rule shall apply to the facility or modification as though construction had not yet commenced on it."

In a RAI (request for additional information) response letter from Mr. Michael Burch, General Manager, dated August 23, 2001, regarding project 0890004-010-AC, it seems very apparent that the representatives of the mill understood the implications of Rule 62-212.400(2)(g), F.A.C. On page 2, specifically the last sentence in the next-to-last paragraph, it is stated:

“It is understood that pursuant to Rule 62-212.400(2)(g) any request to increase production over the limits placed in the permit now to avoid PSD review will result in a full PSD review of number 6 batch digester as if it were a new source at the time of the request for an increase in the production rate.”

In conclusion, per determinations made by DARM, the Department's Northeast District is returning your application request for a minor modification of the facility, received September 12, 2005, because the request is a relaxation in a federally enforceable limit that triggers PSD new source review (NSR) requirements at Rule 62-212.400(5), F.A.C. In addition, the application for a PSD NSR permit should be submitted to the Department's Bureau of Air Regulation, located in Tallahassee, and should include the appropriate processing fee pursuant to Rule 62-4.050, F.A.C.

In regards to questions concerning PSD applicability as it relates to this project, please feel to call Bruce Mitchell , at (850) 488-0114.

Sincerely,



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

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CC: Trina Vielhauer – DARM  
Jeff Koerner – DARM  
Bruce Mitchell - DARM

# Rayonier

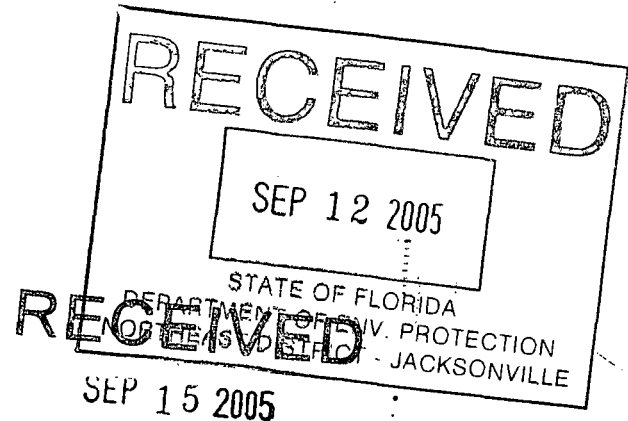
*Performance Fibers*

*Fernandina Mill*

August 30, 2005

Mr. Christopher Kirts, P. E.  
Air Program District Administrator  
7825 Baymeadows Way, Suite B-200  
Jacksonville, FL 32256-7590

RE: Title V Permit No.  
Construction Permit  
Number 6 Power Boiler Construction



Dear Mr. Kirts:

Attached is a permit application for the installation of a replacement boiler at Rayonier Performance Fibers LLC's Fernandina Beach Dissolving Sulfite Pulp Mill and an unrelated production increase. This is a rather straightforward application in that the new boiler is replacing three older boilers with much less stringent emission standards. The new boiler will have four Continuous Emission Monitors, for NO<sub>x</sub>, SO<sub>2</sub>, flow and Opacity, along with oxygen and carbon monoxide monitors for better process control. The old boilers have no Continuous Emission Monitors and only oxygen process monitors. Once the new boiler is installed the old boilers will be decommissioned and eventually dismantled.

As discussed with you and your staff this application covers both the boiler and increasing the production limit placed on the permit in 1998 at the time No. 6 digester was installed. These projects are entirely separate. They are only combined here for ease of permitting. Indeed, the two projects are completely separate. The old boilers need to be replaced because they are unreliable and require frequent repair. The old boilers are, however, capable of producing enough steam in conjunction with the recovery boiler to produce the additional product which is the subject of the second project included in this application. Because the new boiler is not necessary to manufacture this additional product, the production increase is completely separate from the new boiler installation. In fact, the production increase is merely the removal of an artificial limit taken to avoid PSD when #6 digester was added in order to facilitate inspection and repair of the existing digesters.

The boiler permit alone does not trigger PSD permitting. The production increase does not trigger PSD permitting. Any increase in emissions is less than the PSD Significance Level. The power boiler project increases NO<sub>x</sub> and SO<sub>2</sub> emissions to less than significant levels and decreases PM, VOC and carbon monoxide emissions. The Production increase project increases SO<sub>2</sub> and CO emissions and due to emission reductions in the bleach plant VOC emissions will decrease at the final production rate.

Registered to ISO 9002



Certificate No. A2087

Mr. Christopher L. Kirts P. E.  
No.6 Boiler and No.6 Digester Construction Application  
August 30, 2005  
Page 1 of 2

The replacement boiler in this application is actually a used boiler, constructed in 1983, before promulgation of NSPS Subpart Db. A Reconstruction Analysis is provided to demonstrate that this boiler will not undergo reconstruction and therefore retains its status as an existing boiler. The applicable NSPS for this boiler is Subpart D. Because it is not reconstructed the boiler remains an existing source under boiler MACT. It will clearly meet boiler MACT upon startup. It will start up about the deadline for Boiler MACT compliance deadline of September 17, 2007.

The new boiler will be more efficient and reliable and will reduce the consumption of #6 oil in favor of wood waste. The Production Increase Project is a modest increase in production to make full use of the No. 6 digester added in 1998 to avoid production loss during the extensive inspection and maintenance undertaken by the industry on all existing digesters subsequent to the catastrophic loss of a digester at a Florida mill. Because No. 6 digester was added by accepting a production limit in 1998, the PSD analysis had to be done as if the digester had never been constructed. This analysis has been done beginning with 2003-2004 emissions because emission estimates prior to this date would not include reductions mandated by 40 CFR Part 63. The analysis starts with the baseline used in 1998 No. 6 digester permit of 149,957 ADMT/yr (air dried metric tons per year). An increase in the production limit from 153,205 to 175,000 ADMT/year is proposed. Few pieces of the new equipment needed to achieve this rate have emissions. Some additional drying and cooling cans at the machine, and additional washers in the bleach plant. Nanofiltration of the HCE liquor which will free up sufficient evaporator capacity for the additional red liquor produced, and capture of waste heat will also capture VOC emissions at the bleach plant. This project is entirely separate from the boiler project. The mill has sufficient steam capacity with existing boilers to achieve this production.

Since this boiler already exists and engineering work is proceeding quickly we could start moving and working on the boiler and preparing foundations in the October - November 2005 period. This application seems rather straightforward. Your prompt action on it would be appreciated. To expedite timing, this application is only for the Construction Permit leaving the longer lead-time Title V Permit Application to be submitted after issuance of the Construction Permit.

If you have questions regarding this application please contact either Dick Hopper, (904)277-1480, email: dick.hopper@rayonier.com or Dave Tudor (904)277-1452, email: david.tudor@rayonier.com.

Sincerely,



F. J. Perrett  
General Manager



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# Department of Environmental Protection

Division of Air Resource Management

## APPLICATION FOR AIR PERMIT - LONG FORM

**RECEIVED**  
 SEP 15 2005  
 BUREAU OF AIR REGULATION

### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

**Air Operation Permit** – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

**Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)**  
 – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

#### Identification of Facility

1. Facility Owner/Company Name: <b>Rayonier Performance Fibers LLC</b>	
2. Site Name: <b>Fernandina Beach Dissolving Sulfite Pulp Mill</b>	
3. Facility Identification Number: 0890004	
4. Facility Location... Street Address or Other Locator: <b>Foot of Gum Street</b> City: <b>Fernandina Beach</b> County: <b>Nassau</b> Zip Code: <b>32034</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: <b>David E. Tudor</b>	
2. Application Contact Mailing Address... Organization/Firm: <b>Rayonier Inc.</b> Street Address: <b>Post Office Box 2002</b> City: <b>Fernandina Beach</b> State: <b>FL</b> Zip Code: <b>32035</b>	
3. Application Contact Telephone Numbers... Telephone: <b>(904) 277 - 1452</b> ext.      Fax: <b>(904) 277 - 1411</b>	
4. Application Contact Email Address: <b>david.tudor@rayonier.com</b>	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Project Number(s):	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**APPLICATION INFORMATION**

**Purpose of Application**

**This application for air permit is submitted to obtain: (Check one)**

**Air Construction Permit**

Air construction permit.

**Air Operation Permit**

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit  
(Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

**Application Comment**

**A Title V Permit Amendment Application will follow issuance of the Construction Permit. Construction is planned to begin in late November 2005.**

# APPLICATION INFORMATION

## Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
<b>PB06</b>	<b>Bubbling Bed 450 mmBtu/hr boiler</b>	<b>AC</b>	<b>NA</b>

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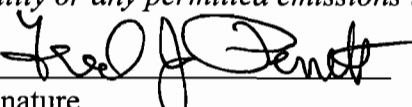
### Application Processing Fee

Check one:  Attached - Amount: \$\_\_\_\_\_  Not Applicable

# APPLICATION INFORMATION

## Owner/Authorized Representative Statement

**Complete if applying for an air construction permit or an initial FESOP.**

1. Owner/Authorized Representative Name : <b>F. J. Perrett</b>
2. Owner/Authorized Representative Mailing Address... Organization/Firm: <b>Rayonier Performance Fibers LLC</b> Street Address: <b>Post Office Box 2002</b> City: <b>Fernandina Beach</b> State: <b>FL</b> Zip Code: <b>32035</b>
3. Owner/Authorized Representative Telephone Numbers... Telephone: <b>(904)277-1405_</b> ext. Fax: <b>(904)277-1411</b>
4. Owner/Authorized Representative Email Address: <b>jack.perrett@rayonier.com</b>
5. Owner/Authorized Representative Statement:  <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. 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 and all other requirements identified in this application to which the facility is subject. 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 the facility or any permitted emissions unit.</i>   Signature _____ Date <u>8/30/05</u>

## APPLICATION INFORMATION

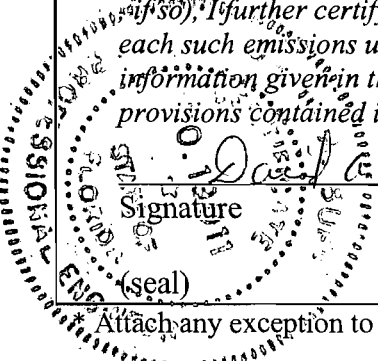
### Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
4. Application Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
5. Application Responsible Official Email Address:
6. Application Responsible Official Certification: <p>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. 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 and all other applicable requirements identified in this application to which the Title V source is subject. 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 the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</p> <p>_____ Signature</p> <p>_____ Date</p>

**APPLICATION INFORMATION**

**Professional Engineer Certification**

1. Professional Engineer Name: <b>David A. Buff</b> Registration Number: <b>19011</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Golder Associates Inc.</b> Street Address: <b>6241 N.W. 23<sup>rd</sup> Street, Suite 500</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32653</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(325)336-5600 ext. 545</b> Fax: <b>(352)336-6603</b>
4. Professional Engineer Email Address: <b>dbuff@golder.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(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</i> <i>(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.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, 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 plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, 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.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, 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.</i>  <div style="display: flex; justify-content: space-between;"> <div style="text-align: center;">  <p>Signature <u>David A. Buff</u></p> </div> <div style="text-align: center;"> <p>Date <u>9/7/05</u></p> </div> </div>

Attach any exception to certification statement.



## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates... Zone <b>14</b> East (km) <b>454.7</b> North (km) <b>3392.2</b>		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
3. Governmental Facility Code: <b>NA</b>	4. Facility Status Code: <b>A</b>	5. Facility Major Group SIC Code: <b>26</b>	6. Facility SIC(s): <b>2611</b>
7. Facility Comment :			

#### Facility Contact

1. Facility Contact Name: <b>Richard Hopper</b>
2. Facility Contact Mailing Address... Organization/Firm: <b>Rayonier Performance Fibers LLC</b> Street Address: <b>Post Office Box 2002</b> City: <b>Fernandina Beach</b> State: <b>FL</b> Zip Code: <b>32035</b>
3. Facility Contact Telephone Numbers: Telephone: ( <b>904</b> ) <b>277-1480</b> ext. Fax: ( <b>904</b> ) <b>277-</b>
4. Facility Contact Email Address: <u><b>dick.hopper@rayonier.com</b></u>

#### Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official Email Address:

## FACILITY INFORMATION

### **Facility Regulatory Classifications**

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1.	<input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2.	<input type="checkbox"/> Synthetic Non-Title V Source	
3.	<input checked="" type="checkbox"/> Title V Source	
4.	<input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5.	<input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6.	<input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7.	<input type="checkbox"/> Synthetic Minor Source of HAPs	
8.	<input type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9.	<input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10.	<input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11.	<input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12.	Facility Regulatory Classifications Comment:	

# FACILITY INFORMATION

## List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
<b>See Attachment 3</b>		

**FACILITY INFORMATION**

**B. EMISSIONS CAPS**

**Facility-Wide or Multi-Unit Emissions Caps**

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:  
**There are no Facility-wide caps proposed in the application.**

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502

FACILITY INFORMATION

**C. FACILITY ADDITIONAL INFORMATION**

**Additional Requirements for All Applications, Except as Otherwise Stated**

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 1</b> <input type="checkbox"/> Previously Submitted, Date:
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 2</b> <input type="checkbox"/> Previously Submitted, Date: _____
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <b>11/6/2002</b>

**Additional Requirements for Air Construction Permit Applications**

1. Area Map Showing Facility Location: <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 4</b> <input type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 5</b>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 5</b> __
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

## FACILITY INFORMATION

### Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):  
 Attached, Document ID: \_\_\_\_\_  Not Applicable (no exempt units at facility)

### Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):  
 Attached, Document ID: \_\_\_\_\_  Not Applicable (revision application)

2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):

- Attached, Document ID: \_\_\_\_\_  
 Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan (Required for all initial/revision/renewal applications):

- Attached, Document ID: \_\_\_\_\_

Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):

- Attached, Document ID: \_\_\_\_\_  
 Equipment/Activities On site but Not Required to be Individually Listed  
 Not Applicable

5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only):

- Attached, Document ID: \_\_\_\_\_  Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:

- Attached, Document ID: \_\_\_\_\_  Not Applicable

### Additional Requirements Comment

**Since this is not a Title V or a PSD permit application, Preconstruction Monitoring, Ambient Impact, Air Quality Impact and Additional Impact analyses are not required by regulation. All pollutants but NO<sub>x</sub> and SO<sub>2</sub> decrease. NO<sub>x</sub> and SO<sub>2</sub> increase less than the PSD significance level of 40 tons per year for each pollutant. The NO<sub>x</sub> Ambient Air Quality Standard is only expressed on a annual average. The new boiler stack height is taller than the existing stacks being replaced. Thus there is no reason to expect such analyses would predict air quality violations. There are no fugitive emissions associated with either project included in this application. Bark, knots and wood chips are wet and not subject to dusting. Only fresh wood chips made onsite are pneumatically conveyed. It was shown in the 1995 Title V permit application that chips contain only minute amounts of suspendable material.**

## EMISSIONS UNIT INFORMATION

Section [ 1 ] of [ 2 ]

### III. EMISSIONS UNIT INFORMATION - PB06

**Title V Air Operation Permit Application** - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

**Air Construction Permit or FESOP Application** - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application** - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

**EMISSIONS UNIT INFORMATION**

Section [ 1 ] of [ 2 ]

**A. GENERAL EMISSIONS UNIT INFORMATION**

**Title V Air Operation Permit Emissions Unit Classification**

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

**Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in this Section: (Check one)

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).

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.

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.

2. Description of Emissions Unit Addressed in this Section: **This emission unit is a fluidized bed boiler burning a variety of fuels but mostly waste wood and bark. The boiler was constructed in 1983 and has not been reconstructed in this conversion.**

3. Emissions Unit Identification Number: **PB06**

4. Emissions Unit Status Code: <b>C</b>	5. Commence Construction Date: <b>11/2005</b>	6. Initial Startup Date: <b>11/2006</b>	7. Emissions Unit Major Group SIC Code: <b>2611</b>	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	--	---	--	--

9. Package Unit: **NA**

Manufacturer:

Model Number:

10. Generator Nameplate Rating: **NA MW**

11. Emissions Unit Comment:



# EMISSIONS UNIT INFORMATION

Section [ 1 ] of [ 2 ]

## Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

The particulate emissions from this boiler are controlled by a large settling chamber followed by a large ESP capable of achieving 0.07 lb/mmBtu PM emissions. Sulfur dioxide emissions are controlled by an alkaline scrubber. The boiler will rely mostly on staged combustion, flue gas recirculation and boiler design to achieve the NO<sub>x</sub> limits. Should it be necessary to lower NO<sub>x</sub> emissions to achieve the annual Cap the boiler is designed to receive an SNCR system.

2. Control Device or Method Code(s): 005, 010, 129, 204, 025, 026, possibly 032

**EMISSIONS UNIT INFORMATION**

Section [1] of [2]

**B. EMISSIONS UNIT CAPACITY INFORMATION**

(Optional for unregulated emissions units.)

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Process or Throughput Rate: <b>NA</b>
2. Maximum Production Rate: <b>NA</b>
3. Maximum Heat Input Rate: <b>525</b> million Btu/hr <b>See comment below.</b>
4. Maximum Incineration Rate: <b>NA</b> pounds/hr tons/day
5. Requested Maximum Operating Schedule: <b>24</b> hours/day <b>7</b> days/week <b>52</b> weeks/year <b>8760</b> hours/year
6. Operating Capacity/Schedule Comment: <b>Maximum Heat Input Rate Comment: The annual average operating rate will not exceed 450 mmBtu/h. However, a maximum heat input rate of 525 mmBtu/hr will be needed for periods when the only other boiler at the facility is down.</b>

**EMISSIONS UNIT INFORMATION**Section[1] of [2] **PB06****C. EMISSION POINT (STACK/VENT) INFORMATION**

(Optional for unregulated emissions units.)

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram: <b>PB06</b>		2. Emission Point Type Code: <b>1</b>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: <b>This is a single bubbling fluidized bed power boiler burning mostly biomass to produce steam for electrical generation and manufacturing process use. The emission exhaust through a single stack.</b>			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: <b>PB06</b>			
5. Discharge Type Code: <b>V</b>	6. Stack Height: feet <b>190 above ground</b>	7. Exit Diameter: feet <b>10</b>	
8. Exit Temperature: <b>150 °F</b>	9. Actual Volumetric Flow Rate: <b>183,421 acfm</b>	10. Water Vapor: <b>21.3 %</b>	
11. Maximum Dry Standard Flow Rate: <b>144,352 dscfm</b>		12. Nonstack Emission Point Height: feet <b>NA</b>	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) <b>30/39/30</b> Longitude (DD/MM/SS) <b>81/28/40</b>	
15. Emission Point Comment:			

**EMISSIONS UNIT INFORMATION**

Section [1] of [2]

**D. SEGMENT (PROCESS/FUEL) INFORMATION**

**Segment Description and Rate:** Segment 1 of 4

1. Segment Description (Process/Fuel Type): <b>This fuel segment is for green bark at about 50% moisture.</b>		
2. Source Classification Code (SCC): <b>10100901</b>		3. SCC Units: <b>tons burned</b>
4. Maximum Hourly Rate: <b>52</b>	5. Maximum Annual Rate: <b>451,425</b>	6. Estimated Annual Activity Factor: <b>NA</b>
7. Maximum % Sulfur: <b>0.03</b>	8. Maximum % Ash: <b>2.27</b>	9. Million Btu per SCC Unit: <b>9</b>
10. Segment Comment: <b>Approximately 60% is self produced as a byproduct.</b>		

**Segment Description and Rate:** Segment 2 of 4

1. Segment Description (Process/Fuel Type): <b>This fuel segment is for knots and sidehill fines recovered as process byproduct at about 50% - 60% moisture.</b>		
2. Source Classification Code (SCC): <b>10100901</b>		3. SCC Units: <b>tons burned</b>
4. Maximum Hourly Rate: <b>5.3</b>	5. Maximum Annual Rate: <b>46,269</b>	6. Estimated Annual Activity Factor: <b>NA</b>
7. Maximum % Sulfur: <b>0.40</b>	8. Maximum % Ash: <b>0.41</b>	9. Million Btu per SCC Unit: <b>9</b>
10. Segment Comment: <b>100% of this fuel is produced as a pulping byproduct.</b>		

**EMISSIONS UNIT INFORMATION**

Section[1] of [2]

**D. SEGMENT (PROCESS/FUEL) INFORMATION (CONTINUED)**

Segment Description and Rate: Segment **3** of **4**

1. Segment Description (Process/Fuel Type): <b>This segment is for Tire Derived Fuel.</b>		
2. Source Classification Code (SCC): <b>10100801</b>		3. SCC Units: <b>tons burned</b>
4. Maximum Hourly Rate: <b>3.0</b>	5. Maximum Annual Rate: <b>26,159</b>	6. Estimated Annual Activity Factor: <b>NA</b>
7. Maximum % Sulfur: <b>1.85</b>	8. Maximum % Ash: <b>4.78</b>	9. Million Btu per SCC Unit: <b>31</b>
10. Segment Comment:		

Segment Description and Rate: Segment **4** of **4**

1. Segment Description (Process/Fuel Type): <b>This segment is for No. 6 oil.</b>		
2. Source Classification Code (SCC): <b>10100401</b>		3. SCC Units: <b>thousand gallons burned</b>
4. Maximum Hourly Rate: <b>1.4</b>	5. Maximum Annual Rate: <b>11,927</b>	6. Estimated Annual Activity Factor: <b>NA</b>
7. Maximum % Sulfur: <b>2.5</b>	8. Maximum % Ash: <b>0.12</b>	9. Million Btu per SCC Unit: <b>150</b>
10. Segment Comment: <b>This segment includes small amounts of self-generated on-spec used oil.</b>		

**EMISSIONS UNIT INFORMATION**  
**Section [1] of [2]**

***E. EMISSIONS UNIT POLLUTANTS***

**List of Pollutants Emitted by Emissions Unit**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
<b>PM</b>	<b>005</b>	<b>010</b>	<b>EL</b>
<b>PM10</b>	<b>010</b>		<b>EL</b>
<b>SO2</b>	<b>129</b>		<b>EL</b>
<b>NO<sub>x</sub></b>	<b>025</b>	<b>026</b>	<b>EL</b>
<b>CO</b>	<b>204</b>		<b>NS</b>
<b>Pb</b>	<b>010</b>		<b>NS</b>

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>PM</b>	2. Total Percent Efficiency of Control: <b>99.9% +</b>
3. Potential Emissions: <b>36.75 lb/hour 137.97 tons/year</b>	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): <b>NA to tons/year</b>	
6. Emission Factor: <b>0.07 lb/mmBtu</b>  Reference: <b>40 CFR 63.7500 Table</b>	7. Emissions Method Code: <b>0</b>
8. Calculation of Emissions: <b>hrly: 525 mmBtu/hr x 0.07 lb/mmBtu = 36.75 lbs/hr</b>  <b>ann: 450 mmBtu/hr x 0.07 lb/mmBtu x 1/2000 tons/lbs x 8760 hr/year = 137.97 TPY</b>	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

**EMISSIONS UNIT INFORMATION**

Section[1] of [2]

**POLLUTANT DETAIL INFORMATION**

Page [2] of [12]

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -**

**ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

**Allowable Emissions** Allowable Emissions **1** of **3**

1. Basis for Allowable Emissions Code: <b>RULE 62-296.410(2)(b)(2)</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: <b>0.2 lb/mmBTU</b>	4. Equivalent Allowable Emissions: <b>105 lb/hour 394.2 tons/year</b>
5. Method of Compliance: <b>Settling Chamber followed by Electrostatic Precipitator</b>	
6. Allowable Emissions Comment (Description of Operating Method): <b>Normal operating mode this boiler will burn mostly bark and knots. 0.2 lb/mmBtu x 450 mmBtu/hr x 8760/2000 = 394.2 TPY 0.2 lb/mmBtu x 525 mmBtu/hr = 105.0 lb/hr</b>	

**Allowable Emissions** Allowable Emissions **2** of **3**

1. Basis for Allowable Emissions Code: <b>RULE 40 CFR 60.42</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: <b>0.1 lb/mmBtu</b>	4. Equivalent Allowable Emissions: <b>52.5 lb/hour 197.1 tons/year</b>
5. Method of Compliance: <b>Settling Chamber followed by Electrostatic Precipitator</b>	
6. Allowable Emissions Comment (Description of Operating Method): <b>0.1 lb/mmBtu x 450 mmBtu/hr x 8760/2000 = 197.1 TPY 0.1 lb/mmBtu x 525 mmBtu/hr = 52.5 lb/hr</b>	

**Allowable Emissions** Allowable Emissions **3** of **3**

1. Basis for Allowable Emissions Code: <b>RULE 40.CFR 63.7500</b>	2. Future Effective Date of Allowable Emissions: <b>09/13/2007</b>
3. Allowable Emissions and Units: <b>0.07 lb/mmBTU</b>	4. Equivalent Allowable Emissions: <b>36.75 lb/hour 137.97 tons/year</b>
5. Method of Compliance: <b>Settling Chamber Electrostatic Precipitator</b>	
6. Allowable Emissions Comment (Description of Operating Method): <b>0.07 lb/mmBtu x 450 mmBtu/hr x 8760/2000 = 137.97 TPY 0.07 lb/mmBtu x 525 mmBtu/hr = 36.75 lb/hr</b>	



**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>PM10</b>	2. Total Percent Efficiency of Control: <b>99.9% +</b>
3. Potential Emissions: <b>36.75 lb/hour    137.97 tons/year</b>	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): <b>NA to tons/year</b>	
6. Emission Factor: <b>0.07 lb/mmBtu</b>  Reference: <b>assume same as PM</b>	7. Emissions Method Code: <b>0</b>
8. Calculation of Emissions: <b>hrly: 525 mmBtu/hr x 0.07 lb/mmBtu = 36.75 lbs/hr</b>  <b>ann: 450 mmBtu/hr x 0.07 lb/mmBtu x 1/2000 tons/lbs x 8760 hr/year = 137.97 TPY</b>	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -**

**ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions \_\_ of \_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method): <b>There are no rule based PM10 emission limits applicable to this boiler. For purposes of calculating emission increases and decreases PM10 is considered equal to PM. The electrostatic precipitator will capture PM10 as well</b>	

Allowable Emissions Allowable Emissions \_\_ of \_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions \_\_ of \_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>SO2</b>	2. Total Percent Efficiency of Control: <b>99</b>
3. Potential Emissions: <b>420 lb/hour      220.95 tons/year</b>	4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): <b>NA to tons/year</b>	
6. Emission Factor: <b>0.8 lb/mmBtu</b>  Reference: <b>40 CFR 60.43(1)</b>	7. Emissions Method Code: <b>0</b>
8. Calculation of Emissions: <b>hrly: 525 mmBtu/hr x 0.8 lb/mmBtu = 420.00 lbs/hr</b>  <b>ann: 450 mmBtu/hr x 0.1121 lb/mmBtu x 1/2000 tons/lbs x 8760 hr/year = 220.95 TPY</b>	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: <b>An annual CAP on SO<sub>2</sub> emissions is requested on this source in this application to avoid PSD permitting.</b>	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -****ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

**Allowable Emissions** Allowable Emissions **1** of **3**

1. Basis for Allowable Emissions Code: <b>RULE 40 CFR 60.43</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: <b>0.8 lb/mmBtu</b>	4. Equivalent Allowable Emissions: <b>420 lb/hour 1,576.8 tons/year</b>
5. Method of Compliance: <b>Alkali scrubber</b>	
6. Allowable Emissions Comment (Description of Operating Method): <b>0.8 lb/mmBtu x 450 mmBtu/hr x 8760/2000 = 1,576.8 TPY</b> <b>0.8 lb/mmBtu x 525 mmBtu/hr = 420 lb/hr</b>	

**Allowable Emissions** Allowable Emissions **2** of **3**

1. Basis for Allowable Emissions Code: <b>ESCPD</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: <b>0.1121 lb/mmBtu</b>	4. Equivalent Allowable Emissions: <b>58.85 lb/hour 220.95 tons/year</b>
5. Method of Compliance: <b>Alkali scrubber and CEMS for SO<sub>2</sub></b>	
6. Allowable Emissions Comment (Description of Operating Method): <b>0.1121 lb/mmBtu x 450 mmBtu/hr x 8760/2000 = 220.95 TPY</b> <b>0.1121 lb mmBtu x 525 mmBtu/hr = 58.85 lb/hr</b> <b>Equivalent hourly and annual emissions are based on an annual averaging time.</b>	

**Allowable Emissions** Allowable Emissions **3** of **3**

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>NO<sub>x</sub></b>	2. Total Percent Efficiency of Control: <b>See Comment.</b>
3. Potential Emissions: <b>157.5 lb/hour    379.95 tons/year</b>	4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): <b>NA to tons/year</b>	
6. Emission Factor: <b>0.3 lb/mmBtu</b>  Reference: <b>Hourly 40 CFR 60.44</b>	7. Emissions Method Code: <b>0</b>
8. Calculation of Emissions: <b>hrly:</b> <b>525 mmBtu/hr x 0.3 lb/mmBtu = 157.5 lbs/hr</b>  <b>annual:</b> <b>450 mmBtu/hr x 0.1928 lb/mmBtu x 8760/2000 = 379.95 TPY</b>	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: <b>NO<sub>x</sub> control is based on methods and designs that prevent the pollutant from forming, or minimizing the fuel bound NO<sub>x</sub> that does form. Therefore it is not possible to calculate a control efficiency as if there were collection of a pollutant.</b>  <b>An annual CAP on NO<sub>x</sub> emissions is requested on this emission unit in this application to avoid PSD permitting.</b>	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -**

**ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

**Allowable Emissions** Allowable Emissions **1** of **2**

1. Basis for Allowable Emissions Code: <b>RULE 40 CFR 60.44</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: <b>0.3 lb/mmBtu</b>	4. Equivalent Allowable Emissions: <b>157.5 lb/hour      591.3 tons/year</b>
5. Method of Compliance: <b>boiler design, staged combustion and flue gas recirculation</b>	
6. Allowable Emissions Comment (Description of Operating Method): <b>0.3 lb/mmBtu x 450 mmBtu/hr x 8760/2000 = 591.3 TPY</b> <b>0.3 lb/mmBtu x 525 mmBtu/hr = 157.5 lb/hr</b>	

**Allowable Emissions** Allowable Emissions **2** of **2**

1. Basis for Allowable Emissions Code: <b>ESCPD</b>	2. Future Effective Date of Allowable Emissions: <b>11/2005</b>
3. Allowable Emissions and Units: <b>379.95 tons per year</b>	4. Equivalent Allowable Emissions: <b>101.20 lb/hour      379.95 tons/year</b>
5. Method of Compliance: <b>CEMS for NO<sub>x</sub>. The boiler will minimize NO<sub>x</sub> formation by furnace design, flue gas recirculation and staged combustion. If these methods are inadequate the boiler is designed to have SNCR installed.</b>	
6. Allowable Emissions Comment (Description of Operating Method): <b>0.1928 lb/mmBtu x 450 mmBtu/hr x 8760/2000 = 379.95 TPY</b> <b>0.1928 lb/mmBTU x 525 mmBtu/hr = 101.20 lb/hr</b> <b>Equivalent hourly and annual emissions are based on an annual averaging time.</b>	

**Allowable Emissions** Allowable Emissions    of   

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>CO</b>	2. Total Percent Efficiency of Control: <b>See Comment.</b>
3. Potential Emissions: <b>105 lb/hour      394.2 tons/year</b>	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): <b>NA to tons/year</b>	
6. Emission Factor: <b>0.2 lb/mmBtu</b>  Reference:	7. Emissions Method Code:
8. Calculation of Emissions: <b>hrly: 525 mmBtu/hr x 0.2 lb/mmBtu = 105 lbs/hr</b>  <b>annual: 450 mmBtu/hr x 0.2 lb/mmBtu X 8760/2000 = 394.2 TPY</b>	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: <b>CO control is based on methods and designs that prevent the pollutant from forming. Therefore it is not possible to calculate a control efficiency as if there were collection of a pollutant.</b>	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions \_\_ of \_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. - Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method): <b>There is no rule based emission limit for CO for this boiler. CO emissions for this boiler are expected to be significantly less than experienced with the less efficient existing boilers that CO emissions decrease and PSD limits should not be of concern.</b>	

Allowable Emissions Allowable Emissions \_\_ of \_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions \_\_ of \_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	



**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>Pb</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>0.38 lb/hour 1.65 tons/year</b>	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): <b>NA to tons/year</b>	
6. Emission Factor: <b>see calculation and comment</b>  Reference: <b>calculated from NCASI</b>	7. Emissions Method Code:
8. Calculation of Emissions:  <b>451,425t bark/yr X 0.0073 lb Pb/ton bark = 3,295.4 lbs/yr</b> <b>46,269 t knots/yr x 0.0013 lb Pb/ton knots = 60.2 lb/yr</b>  <b>3355.6 lb/yr /8760 = 0.38 lb/hr</b>	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: <b>Pb emissions from burning bark and knots are based on the Pb in bark and wood, and assuming all Pb is emitted, where generally it stays with the bottom ash. Further this calculation does not consider the collection efficiency of the ESP. Thus this is a worst case projection.</b>	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -**

**ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions \_\_ of \_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method): <b>There are no regulation based emission limits for Pb applicable to this boiler.</b>	

Allowable Emissions Allowable Emissions \_\_ of \_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions \_\_ of \_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**EMISSIONS UNIT INFORMATION**

Section[1] of [3]

**G. VISIBLE EMISSIONS INFORMATION**

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 3

1. Visible Emissions Subtype: <b>VE20</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: <b>30 %</b> Exceptional Conditions: <b>40 %</b> Maximum Period of Excess Opacity Allowed: <b>2 min/hour</b>	
4. Method of Compliance: <b>Electrostatic Precipitator</b>	
5. Visible Emissions Comment: <b>62-296.410(2)(b)(1)</b>	

**Visible Emissions Limitation:** Visible Emissions Limitation 2 of 3

1. Visible Emissions Subtype: <b>VE20</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: <b>20 %</b> Exceptional Conditions: <b>27 %</b> Maximum Period of Excess Opacity Allowed: <b>6 min/hour</b>	
4. Method of Compliance: <b>Electrostatic Precipitator</b>	
5. Visible Emissions Comment: <b>40 CFR 60.42</b>	

**Visible Emissions Limitation:** Visible Emissions Limitation 3 of 3

1. Visible Emissions Subtype: <b>VE20</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: <b>20 %</b> Exceptional Conditions: <b>27 %</b> Maximum Period of Excess Opacity Allowed: <b>6 min/hour</b>	
4. Method of Compliance: <b>Electrostatic Precipitator</b>	
5. Visible Emissions Comment: <b>40 CFR 63. 7500</b>	

**EMISSIONS UNIT INFORMATION**

Section[1] of [2]

**H. CONTINUOUS MONITOR INFORMATION**

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor 1 of 4

1. Parameter Code: <b>VE</b>		2. Pollutant(s): <b>visible emissions (opacity)</b>	
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other			
4. Monitor Information... <b>See comment</b> Manufacturer: Model Number: Serial Number:			
5. Installation Date: <b>projected by 11/2006</b>		6. Performance Specification Test Date: <b>projected by 5/2007</b>	
7. Continuous Monitor Comment: <b>Rule – 40 CFR 63.7525 and 63.7535</b> <b>This monitor has not been selected at submittal of this construction application. The details of the selected monitor will be submitted with the Title V operating permit to follow. The location of this instrument is also to be determined as there is a wet scrubber prior to stack exit.</b>			

Continuous Monitoring System: Continuous Monitor 2 of 4

1. Parameter Code: <b>EM</b>		2. Pollutant(s): <b>SO2</b>	
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other			
4. Monitor Information... <b>See comment</b> Manufacturer: Model Number: Serial Number:			
5. Installation Date: <b>projected by 11/2006</b>		6. Performance Specification Test Date: <b>projected by 5/2007</b>	
7. Continuous Monitor Comment: <b>There is a rule requirement for a SO2 CEM (40 CFR 60.45(a)). Also, a SO2 CAP is requested for this boiler to avoid PSD review. This monitor is proposed to document compliance with the emissions CAP.</b>  <b>This monitor has not been selected at submittal of this construction application. The details of the selected monitor will be submitted with the Title V operating permit to follow.</b>			

**EMISSIONS UNIT INFORMATION**

Section[1] of [2]

**H. CONTINUOUS MONITOR INFORMATION (CONTINUED)**

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor **3** of **4**

1. Parameter Code: <b>EM</b>	2. Pollutant(s): <b>NOX</b>
3. CMS Requirement: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other	
4. Monitor Information... <b>See comment</b> Manufacturer: Model Number: Serial Number:	
5. Installation Date: <b>projected 11/2006</b>	6. Performance Specification Test Date: <b>projected 5/2007</b>
7. Continuous Monitor Comment: <b>There is no rule requirement for a NO<sub>x</sub> CEM (40 CFR 60.45(b)(3)). However, a NO<sub>x</sub> CAP is requested for this boiler to avoid PSD review. This monitor is proposed to document compliance with the emissions CAP.</b>  <b>This monitor has not been selected at submittal of this construction application. The details of the selected monitor will be submitted with the Title V operating permit to follow.</b>	

Continuous Monitoring System: Continuous Monitor **4** of **4**

1. Parameter Code: <b>FLOW</b>	2. Pollutant(s): <b>volumetric flow rate</b>
3. CMS Requirement: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other	
4. Monitor Information... <b>See comment</b> Manufacturer: Model Number: Serial Number:	
5. Installation Date: <b>projected 11/2006</b>	6. Performance Specification Test Date: <b>projected 5/2007</b>
7. Continuous Monitor Comment: <b>There is no rule requirement for a flow monitor. However, annual CAPs for NO<sub>x</sub> and SO<sub>2</sub> are requested for this boiler to avoid PSD review. This monitor is proposed to document compliance with the emissions CAP.</b>  <b>This monitor has not been selected at submittal of this construction application. The details of the selected monitor will be submitted with the Title V operating permit to follow.</b>	

**EMISSIONS UNIT INFORMATION**

**I. EMISSIONS UNIT ADDITIONAL INFORMATION**

**Additional Requirements for All Applications, Except as Otherwise Stated**

<p>1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input checked="" type="checkbox"/> Attached, Document ID: <u>6</u> previously Submitted, Date _____</p>
<p>2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input checked="" type="checkbox"/> Attached, Document ID: <u>7</u> <input type="checkbox"/> Previously Submitted, Date _____</p>
<p>3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input checked="" type="checkbox"/> Attached, Document ID: <u>8</u> <input type="checkbox"/> Previously Submitted, Date _____</p>
<p>4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____</p> <p><input checked="" type="checkbox"/> Not Applicable (construction application)</p>
<p>5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input checked="" type="checkbox"/> Attached, Document ID: <u>9</u> <input type="checkbox"/> Previously Submitted, Date _____</p> <p><input type="checkbox"/> Not Applicable</p>
<p>6. Compliance Demonstration Reports/Records</p> <p><input type="checkbox"/> Attached, Document ID: _____</p> <p style="padding-left: 40px;">Test Date(s)/Pollutant(s) Tested: _____</p> <p><input type="checkbox"/> Previously Submitted, Date: _____</p> <p style="padding-left: 40px;">Test Date(s)/Pollutant(s) Tested: _____</p> <p>_____</p> <p><input type="checkbox"/> To be Submitted, Date (if known): _____</p> <p style="padding-left: 40px;">Test Date(s)/Pollutant(s) Tested: _____</p> <p>_____</p> <p><input checked="" type="checkbox"/> Not Applicable</p> <p>Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.</p>
<p>7. Other Information Required by Rule or Statute</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>

**EMISSIONS UNIT INFORMATION**

Section[1] of [2]

**Additional Requirements for Air Construction Permit Applications**

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input checked="" type="checkbox"/> Attached, Document ID: <b>10</b> _____ <input type="checkbox"/> Not Applicable

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

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _ <input checked="" type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable

**Additional Requirements Comment**

**No BACT analysis is required because this is not a PSD permit. Nevertheless, the boiler is using state of the art design in this conversion plus modern ESP and scrubbing techniques.**

**A GEP analysis is not required because this is not a PSD permit application. However, the stack does not exceed 2.5 times the height of the nearest building. It is higher than the existing stacks it is replacing. The applicant submitted modeling in 1991 to demonstrate these stacks were high enough to avoid downwash effects.**



## EMISSIONS UNIT INFORMATION

Section [2] of [2]

### III. EMISSIONS UNIT INFORMATION - PG

**Title V Air Operation Permit Application** - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

**Air Construction Permit or FESOP Application** - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application** – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

**EMISSIONS UNIT INFORMATION**

Section [2] of [2]

**A. GENERAL EMISSIONS UNIT INFORMATION**

**Title V Air Operation Permit Emissions Unit Classification**

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

**Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in this Section: (Check one)

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).

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.

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.

2. Description of Emissions Unit Addressed in this Section: **This emission unit is the pulping segment of the facility which is involved with the cooking wood chips and the manufacture of the cooking acid. The construction permit covers the addition of a new digester, No. 6 digester, to five existing digesters.**

3. Emissions Unit Identification Number: 005

4. Emissions Unit Status Code: <b>A</b>	5. Commence Construction Date: <b>11/2005</b>	6. Initial Startup Date: <b>11/2006</b>	7. Emissions Unit Major Group SIC Code: <b>26</b>	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
---	---	---	---	--

9. Package Unit: **NA**  
Manufacturer: \_\_\_\_\_ Model Number: \_\_\_\_\_

10. Generator Nameplate Rating: **NA** MW

1. Emissions Unit Comment:  
**No. 6 digester was added in 1998 based on analyses and permitting at that time. That analysis was based on production and limited production to 153,210 ADMT to avoid PSD permitting. This application re-examines that analysis and seeks to change the production limit in the permit issued.**

## EMISSIONS UNIT INFORMATION

Section[2] of [2]

### Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

**The pulping segment of the mill is required to control 2 pollutants, sulfur dioxide (SO<sub>2</sub>) and methanol, a component of VOC. Sulfur dioxide is collected from digesters blow tanks, washers and cooking acid tanks and used to make or strengthen cooking liquor. Streams containing SO<sub>2</sub> that are too weak to economically or practically recover are passed through an alkaline packed scrubber prior to discharge.**

**Methanol is collected at the pulping and washing and evaporation segments of the mill and biologically destroyed in the waste water treatment plant. Methanol collection is by condensation and solution in water which is conveyed via the sewer system to the waste water treatment system. Methanol is a VOC and the condenser/scrubbers used for its collection also collect VOCs. The methanol collection system was not installed until 2001. Calculations are based on 2002 and 2003 calendar years as these were the first two years of operation under Subpart S MACT. Using older emissions would result in an inflated baseline by not accounting for more stringent emission reductions imposed by Subpart S MACT.**

2. Control Device or Method Code(s): **050, 050**

**EMISSIONS UNIT INFORMATION**

Section[2] of [2]

***B. EMISSIONS UNIT CAPACITY INFORMATION***

(Optional for unregulated emissions units.)

**Emissions Unit Operating Capacity and Schedule**

1.	Maximum Process or Throughput Rate: <b>175,000 ADMT</b>
2.	Maximum Production Rate: <b>175,000 ADMT</b>
3.	Maximum Heat Input Rate: million Btu/hr <b>NA</b>
4.	Maximum Incineration Rate: pounds/hr <b>NA</b> tons/day
5.	Requested Maximum Operating Schedule: <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"><b>8</b> hours/day <b>52</b> weeks/year</div> <div style="text-align: center;"><b>7</b> days/week <b>8760</b> hours/year</div> </div>
6.	Operating Capacity/Schedule Comment:

**EMISSIONS UNIT INFORMATION**

Section[2] of [2]

**C. EMISSION POINT (STACK/VENT) INFORMATION**

(Optional for unregulated emissions units.)

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram: <b>PG</b>		2. Emission Point Type Code: <b>3</b>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: <b>See Attachment 11 for Flow Sheet and Emission Unit Designations of equipment and emission points.</b>			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: <b>See Attachment 11</b>			
5. Discharge Type Code: <b>V</b>		6. Stack Height: feet <b>110</b>	
		7. Exit Diameter: feet <b>3</b>	
8. Exit Temperature: <b>122 °F</b>		9. Actual Volumetric Flow Rate: <b>28,350 acfm</b>	
		10. Water Vapor: <b>13%</b>	
11. Maximum Dry Standard Flow Rate: <b>25,400 dscfm</b>		12. Nonstack Emission Point Height: <b>NA</b> feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment:			

**EMISSIONS UNIT INFORMATION**

Section[2] of [2]

**D. SEGMENT (PROCESS/FUEL) INFORMATION**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): <b>This segment is the pulp production of the facility including #6 digester.</b>		
2. Source Classification Code (SCC): <b>3070010</b>	3. SCC Units: <b>lb/Air Dried Short Ton Unbleached Pulp</b>	
4. Maximum Hourly Rate: <b>41.6</b>	5. Maximum Annual Rate: <b>267,922</b>	6. Estimated Annual Activity Factor: <b>NA</b>
7. Maximum % Sulfur: <b>NA</b>	8. Maximum % Ash: <b>NA</b>	9. Million Btu per SCC Unit: <b>NA</b>
10. Segment Comment: <b>175,000 ADMT/yr x 1.1023 ST/MT x 1.3889 UB/B = 267,922 ADSTUP (air dry short ton unbleached pulp)</b>		

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

1. Segment Description (Process/Fuel Type):		
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:		

**EMISSIONS UNIT INFORMATION**

Section[2] of [2]

***D. SEGMENT (PROCESS/FUEL) INFORMATION (CONTINUED)***

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

1. Segment Description (Process/Fuel Type):		
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:		

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

1. Segment Description (Process/Fuel Type):		
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:		

**EMISSIONS UNIT INFORMATION**

Section[2] of [2]

***E. EMISSIONS UNIT POLLUTANTS***

**List of Pollutants Emitted by Emissions Unit**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
<b>SO2</b>	<b>050</b>		<b>EL</b>
<b>VOC</b>	<b>050</b>		<b>EL</b>



**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>SO<sub>2</sub></b>		2. Total Percent Efficiency of Control: <b>estimated 95%</b>	
3. Potential Emissions: <b>61.0</b> lb/hour <b>267.00</b> tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): <b>NA</b> to tons/year			
6. Emission Factor: <b>250 ppm</b> Reference: <b>CEM</b>		7. Emissions Method Code: <b>1</b>	
8. Calculation of Emissions:  <b>hourly</b> <b><math>250 \text{ ppm}/10^6 \times 25,400 \text{ dscfm} \times 60 \times 0.0025 \text{ mole SO}_2/\text{dscf} \times 64 \text{ lb/mole}</math></b> <b>= 61.0 lbs/hr</b>  <b>annual</b> <b><math>61.0 \text{ lb/hr} \times 8760/2000 = 267.00 \text{ TPY}</math></b>			
9. Pollutant Potential/Estimated Fugitive Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -**

**ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **1** of **1**

1. Basis for Allowable Emissions Code: <b>RULE</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: <b>250 ppm volume</b>	4. Equivalent Allowable Emissions: <b>61.0 lb/hour 267.00 tons/year</b>
5. Method of Compliance: <b>Alkaline Scrubber and Continuous Stack Monitor</b>	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions \_\_\_ of \_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions \_\_ of \_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>Methanol</b>	2. Total Percent Efficiency of Control: <b>estimated 95%</b>
3. Potential Emissions: <b>60.56 lb/hour 265.24 tons/year</b>	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): <b>NA to tons/year</b>	
6. Emission Factor:  Reference: <b>40 CFR 63.444</b>	7. Emissions Method Code: <b>1</b>
8. Calculation of Emissions:  <b>annual</b> <b>2.2 lb/ODSTUP X 267,922 ADSTUP x 0.9 OD/AD x 1 T/ 2000 LB = 265.24 TPY</b>  <b>hourly</b> <b>265.24 T/yr x 2000 lb/T x 1 yr/365 op days x 1 day / 24 hr = 60.56 lb/hr</b>	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: <b>40 CFR 63.444 limits this emission unit plus the evaporator emissions plus emissions from the wastewater treatment system to 2.2 lb methanol per oven dry unbleached short ton. The actual emissions from this source could vary as long as the total is not exceeded. This provision is all ready part of the Title V permit and no change to it is being requested.</b>	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -**

**ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>RULE</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: <b>2.2 lb/oven dry unbleached short ton</b>	4. Equivalent Allowable Emissions: lb/hour <b>265.24</b> tons/year
5. Method of Compliance: <b>Continuous Monitoring System</b>	
6. Allowable Emissions Comment (Description of Operating Method): <b>175,000 ADMT x 0.992 OD/ADMT / 0.72 UB/B x 2.2 lb/ton / 2000 = 265.24 TPY</b>	

Allowable Emissions Allowable Emissions \_\_ of \_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions \_\_ of \_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**EMISSIONS UNIT INFORMATION**

Section **[2]** of **[2]**

**G. VISIBLE EMISSIONS INFORMATION**

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

**Visible Emissions Limitation:** Visible Emissions Limitation **1** of **1**

1. Visible Emissions Subtype: <b>VE</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: <b>30 %</b> Exceptional Conditions: <b>40%</b> Maximum Period of Excess Opacity Allowed: <b>2 min/hour</b>	
4. Method of Compliance: <b>Method 9</b>	
Visible Emissions Comment: <b>FAC 62-296.320(4)(b)(1)</b>  <b>This is wet stack on a process that does not produce particulate emissions.</b>	

**Visible Emissions Limitation:** Visible Emissions Limitation \_\_\_ of \_\_\_

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

**EMISSIONS UNIT INFORMATION**

Section[2] of [2]

**H. CONTINUOUS MONITOR INFORMATION**

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor 1 of 1

1. Parameter Code: <b>EM</b>	2. Pollutant(s): <b>SO2</b>
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information... Manufacturer: <b>Siemens</b> Model Number: <b>Ultramat SE:SSN-EN-40</b> Serial Number:	
5. Installation Date: <b>March 23, 1995</b>	6. Performance Specification Test Date: <b>June 16, 1995</b>
7. Continuous Monitor Comment: <b>Continuous emission monitor required by condition 6 of air operating permit AO45-182645.</b>	

**Continuous Monitoring System:** Continuous Monitor \_\_\_ of \_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

**EMISSIONS UNIT INFORMATION**

Section[2] of [2]

**H. CONTINUOUS MONITOR INFORMATION (CONTINUED)**

Complete if this emissions unit is or would be subject to continuous monitoring.

**Continuous Monitoring System:** Continuous Monitor \_\_\_ of \_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

**Continuous Monitoring System:** Continuous Monitor \_\_\_ of \_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

**EMISSIONS UNIT INFORMATION**

Section **[2]** of **[2]**

***I. EMISSIONS UNIT ADDITIONAL INFORMATION***

**Additional Requirements for All Applications, Except as Otherwise Stated**

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <b>11</b> _____ <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <b>12</b> _____ <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <b>13</b> _____ <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable



6. Compliance Demonstration Reports/Records

Attached, Document ID: \_\_\_\_\_

Test Date(s)/Pollutant(s) Tested: \_\_\_\_\_

Previously Submitted, Date: \_\_\_\_\_

Test Date(s)/Pollutant(s) Tested: \_\_\_\_\_

To be Submitted, Date (if known): \_\_\_\_\_

Test Date(s)/Pollutant(s) Tested: \_\_\_\_\_

Not Applicable

Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute

Attached, Document ID: \_\_\_\_\_

Not Applicable

**EMISSIONS UNIT INFORMATION**

Section[2] of [2]

**Additional Requirements for Air Construction Permit Applications**

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

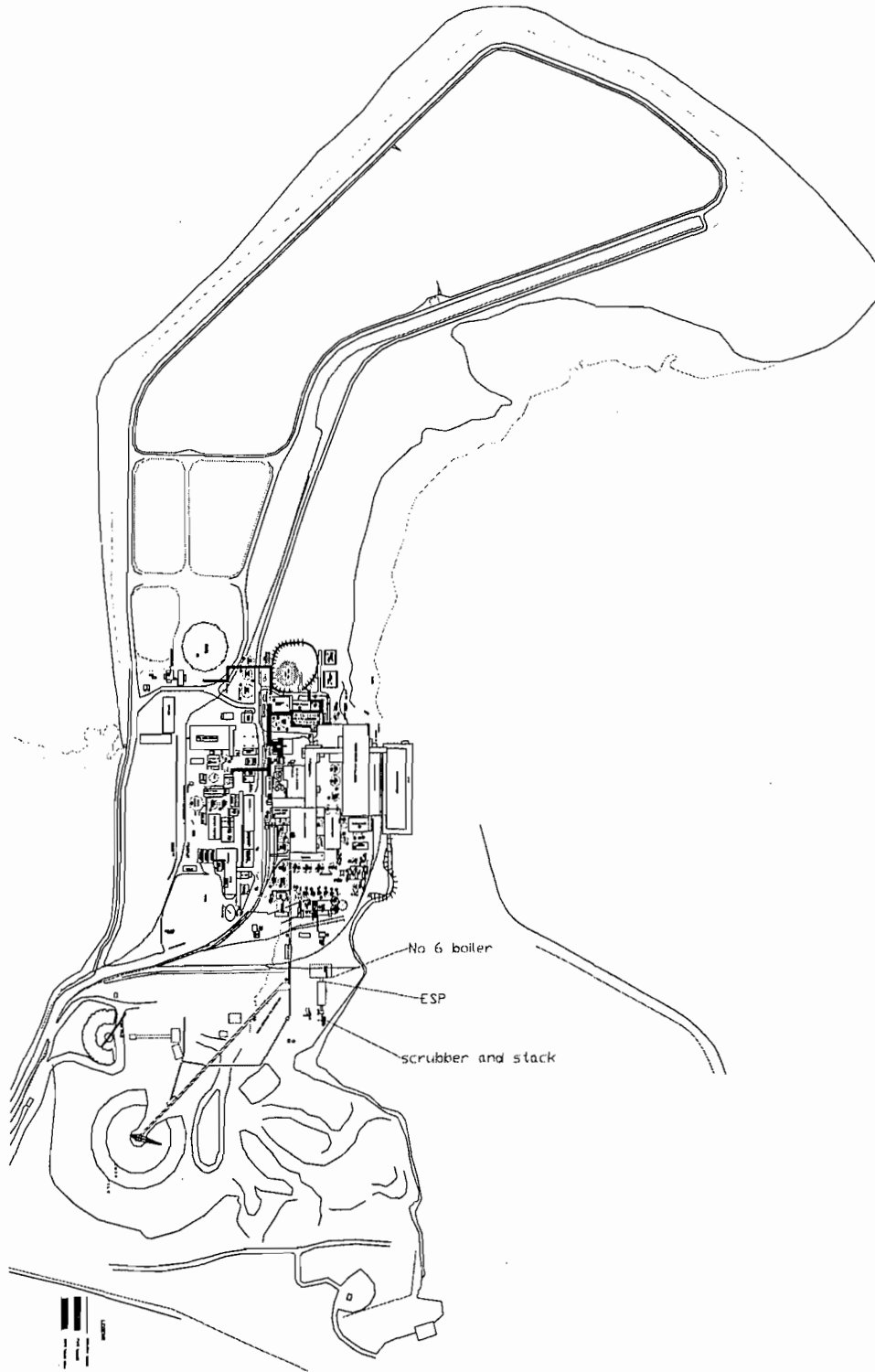
**Additional Requirements for Title V Air Operation Permit Applications**

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _ <input checked="" type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable

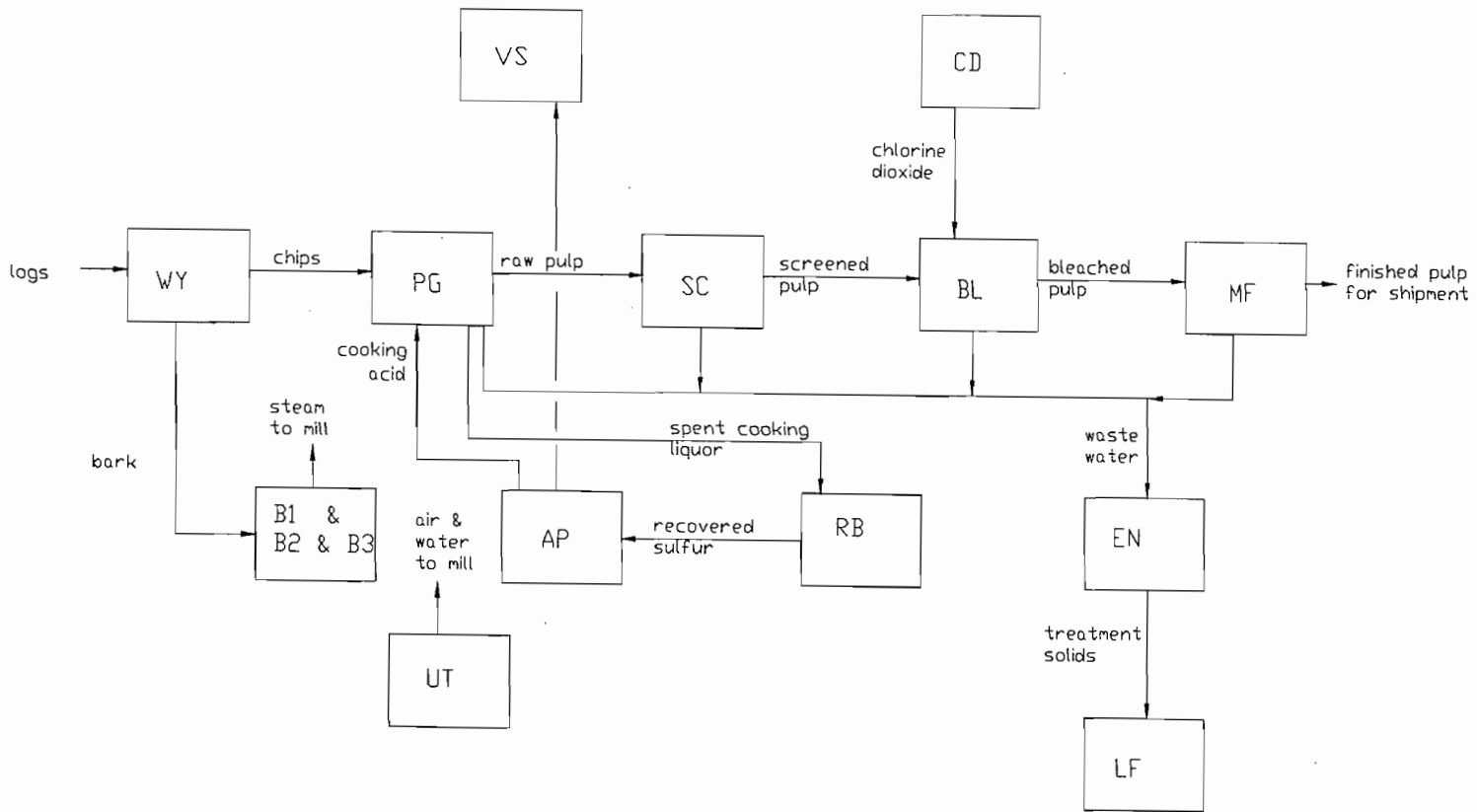
**Additional Requirements Comment**

[Empty rectangular box for additional requirements comment]

# ATTACHMENT 1 - Facility Plot Plan



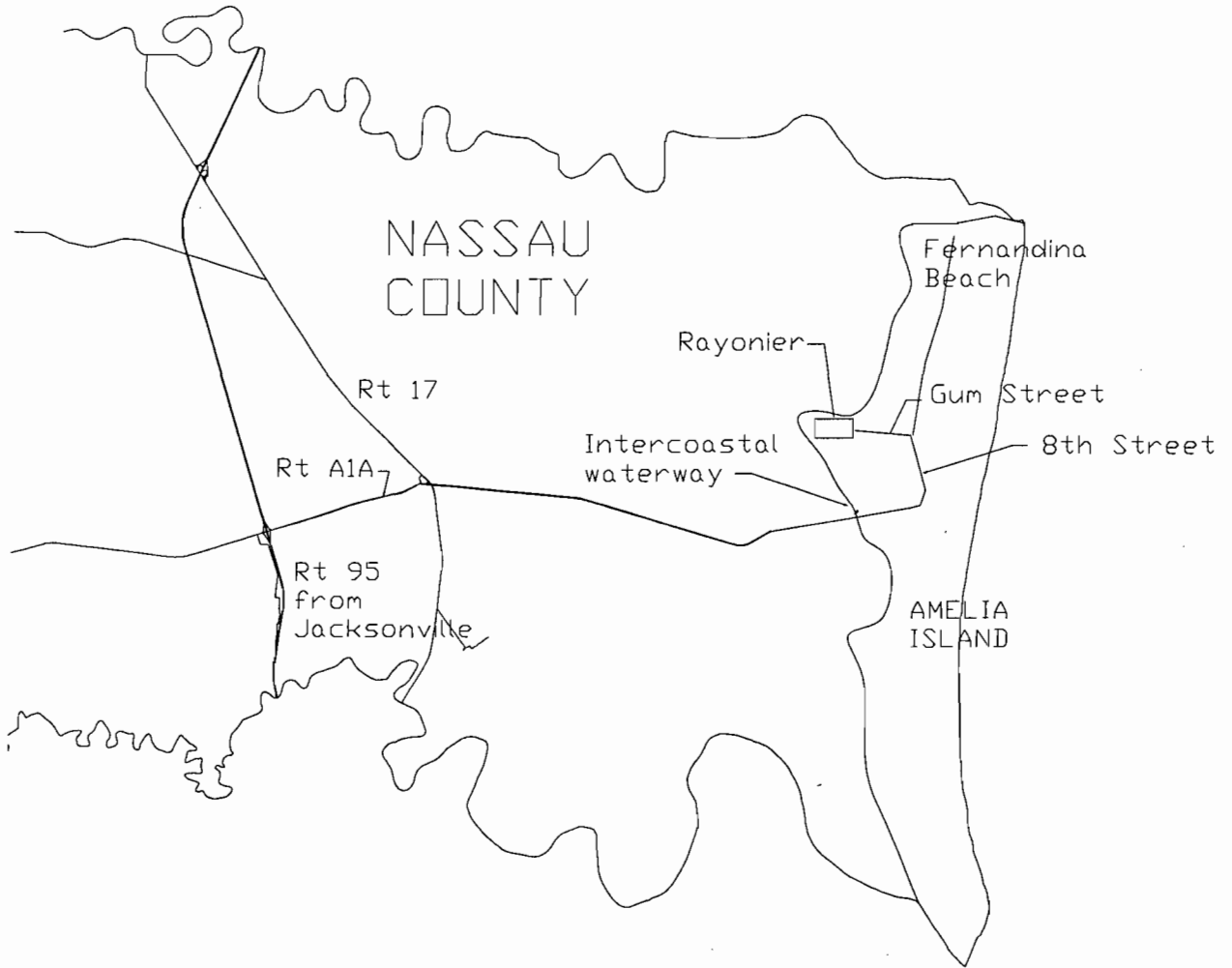
# ATTACHMENT 2 - Facility Flow Diagram



### ATTACHMENT 3 - List of Pollutants Emitted by Facility

PM10	(Particles)	A	N
SO2	(Sulfur Dioxide)	A	N
NOx	(Nitrogen Dioxide)	A	Y
CO	(Carbon Monoxide)	A	N
VOC	(Volatile Organic Compounds)	A	N
HAPS	(Total Hazardous Air Pollutant)	A	N
H115	(Methanol)	A	N
H038	(Chlorine)	A	N
H043	(Chloroform)	A	N
PB	(Lead)	B	N
H047	(Cobalt)	B	N
H120	(MEK)	A	N
H001	(Acetaldehyde)	A	N
H106	(HCl)	B	N
H095	(Formaldehyde)	B	N
H006	(Acrolein)	B	N
H118	(Chloromethane)	B	N
H163	(Styrene)	B	N
CFC	(totalCFCs)	B	N
H128	(Methylene chloride)	B	N
H033	(Carbon Tetrachloride)	B	N
H017	(Benzene)	B	N
H123	(Methyl Isobutyl Ketone)	B	N
H169	(Toluene)	B	N
H041	(Chlorobenzene)	B	N
H085	(Ethyl benzene)	B	N
H187	(Xylene)	B	N
H166	(1,1,2,2-tetrachloroethane)	B	N
H061	(1,4, dichlorobenzene)	B	N
H174	(1,2,4-trichlorobenzene)	B	N
H165	(TCDD)	B	N
H2S	(Hydrogen sulfide)	B	N
H167	(Tetrachloroethene)	B	N
H176	(Trichloroethylene)	B	N
H119	(1,1,1-trichloroethane)	B	N
H104	(Hexane)	B	N
H0323	(Carbon disulfide)	B	N
H117	(Bromomethane)	B	N
	(Chlorine dioxide)	A	N
H113	(Manganese)	B	N
H114	(Mercury)	B	N
H133	(Nickel)	B	N
H148	(Phosphorous)	B	N

# ATTACHMENT 4 - Area Map

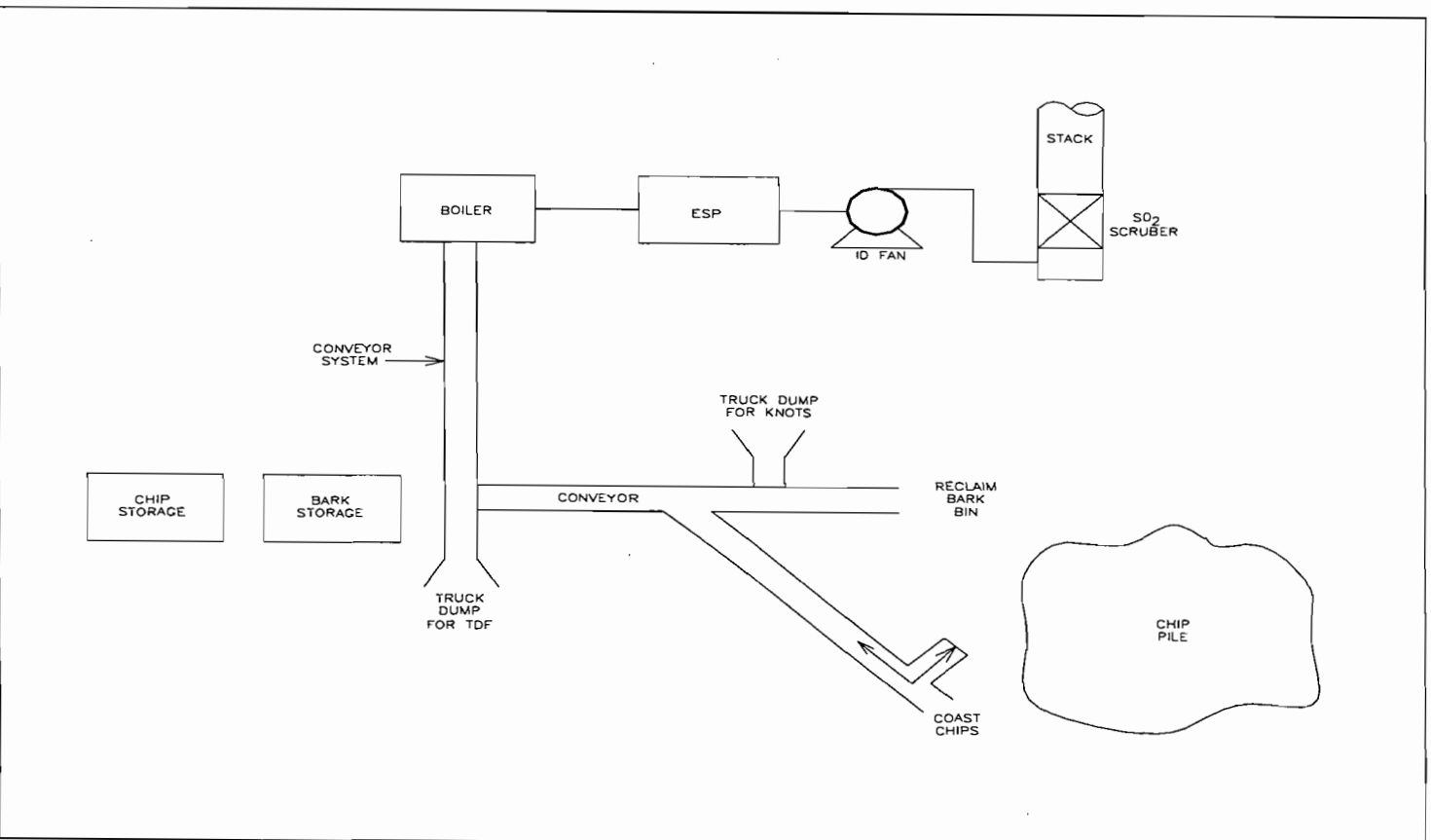


# ATTACHMENT 5 - Description Of Construction and Rule Applicability Analysis

See Separate Document



ATTACHMENT 6 - PB06 Process Flow Diagram



## ATTACHMENT 7 - PB06 Fuel Analysis

Four main fuels will be fired in power boiler No. 6: bark, oil, knots, landscape waste and Tire Derived Fuel. The proximate and ultimate analyses for each is given below.

Fuel	Bark	Knots	TDF	#6 Fuel Oil
<b>Proximate Analysis</b>				
Fixed Carbon	9.95	4.94	27.5	
Volatiles	40.19	27.71	65.5	
Sulfur	0.03	0.40	1.85	
Ash	2.27	0.41	4.78	
Moisture	47.59	66.94	0.37	
<b>Ultimate Analysis</b>				
Carbon	28.07	19.49	83.00	85.70
Hydrogen	3.00	2.10	7.50	10.50
Oxygen	18.82	10.49	0.50	0.92
Nitrogen	0.22	0.17	0.37	0.92
Chlorine	0.01	0.01		
Sulfur	0.03	0.4	1.85	2.50
Ash	2.27	0.41	4.78	0.08
Moisture	47.59	66.94	2.00	

# ATTACHMENT 8 - PB06 Detailed Description of Control Equipment

## PARTICULATE EMISSION CONTROL EQUIPMENT

Ash Hopper. There will be a settling chamber ahead of the electrostatic precipitator. This piece of equipment is referred to as the ash hopper. It will allow large particles to settle and reduce the ash and grain loading to the ESP. This hopper will have a screw conveyor bottom to remove this ash for disposal.

Electrostatic Precipitator. This unit will be a rigid electrode and collector plate design having four fields with a dedicated transformer/rectifier (T/R) set for each field. To minimize reintrainment each field will have its own ash-hopper with a screw conveyor discharge.

An opacity monitor is not required by rule, but one will be installed following the electrostatic precipitator and before the scrubber. This will be used to control boiler operation in addition to other control instruments and equipment. This monitor will not be monitoring the emissions as they exit the stack because there is a wet scrubber prior to stack top exhaust. The opacity monitor can not operate in a saturated gas stream.

## SULFUR DIOXIDE EMISSION CONTROL EQUIPMENT

Alkaline Wet Scrubber. After the Induced Draft Fan will be an SO<sub>2</sub> gas scrubber. A spray of 4,000 gpm of recirculated alkaline water will cascade from showers over chevrons and louvre type packings. This type scrubber has a low pressure drop of about 2 inches WG. It is expected to remove 90% or more of the SO<sub>2</sub> in the inlet. The alkalinity of the wood ash is expected to also achieve some SO<sub>2</sub> capture.

## NITROGEN OXIDES EMISSION CONTROL EQUIPMENT

Initially no collection equipment will be installed, however, provision will be made to install this control equipment. The boiler furnace will be lengthened to increase residence time allowing a lower flame temperature through staged combustion which decreases NO<sub>x</sub> formation. Also flame temperature and the rate of oxidation will be controlled through flue gas recirculation. Should it be necessary the boiler will also be capable of receiving a SNCR. Installation.

# **ATTACHMENT 9 - PB06 Operation and Maintenance Plan**

## **Number 6 Power Boiler Rayonier Performance Fibers, LLC. Fernandina Mill**

### **Brief Description of the Boiler**

No. 6 power boiler is a reconstruction of the Smurfit Jacksonville Mill No. 10 Combustion Engineering [CE VU-40] power boiler originally built in 1982, modified to burn high moisture fuels. No. 6 power boiler has a nominal steam production capacity of 265,000 lb/hr at 900 psig and 875°F. Routinely the boiler burns bark and wood waste. It is capable of supplementing with No. 6 fuel oil to a maximum capability of 310,000 lb/hr steam production when the recovery boiler is out of service. The combustion is accomplished in a Bubbling Fluidized Bed [BFB]. It has the capability of burning bark, wood waste, reject knots, tire derived fuel [TDF] and the mill's on-specification used oil.

In addition to the very efficient BFB combustion, No. 6 power boiler is equipped with a new electrostatic precipitator, a relocated scrubber and the nozzles for a selective non-catalytic reduction [SNCR] system. The SNCR system will not be installed nor operated unless the nitrogen oxide emissions are higher than expected. A new continuous emissions monitoring system [CEMS] is installed to measure opacity, carbon monoxide, sulfur dioxide, nitrogen dioxides and oxygen.

### **Maintenance and Inspection**

All systems and equipment are set up for routine preventative maintenance inspections and or calibrations.

Operators inspect all critical equipment for any type of defect on a daily basis.

Deficiencies that cannot be corrected by the operator are to be appropriately recorded and reported so that necessary repairs may be made in a timely manner.

A complete inspection of all aspects of the boiler will be made during each maintenance repair shutdown.

The results of the inspections will:

Identify and analyze potentially unsafe conditions during simulated inspections

Recommend corrective action

Detect hidden hazardous conditions during inspections

Communicate findings effectively, both verbally and in writing

The inspections involve ensuring the safe operation of the boiler by performing periodic inspections and by close monitoring of all repair work. The boiler to be installed will be built to a standardized nationwide construction code, the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code.

The inspections will be performed by an inspector commissioned by the National Board of Boiler and Pressure Vessel Inspectors

**Monitoring of Operations and Records**

Records of the duration and occurrence of startups, shutdowns, and malfunctions of the boiler and associated air emission control systems and any period during which the continuous monitoring system is inoperative shall be recorded and the record maintained for a period of five years. A record of boiler downtime due to any maintenance activity shall be maintained.

The continuous emissions monitoring system shall be continuously monitored. When an excursion of a parameter is indicated, corrective action will be immediately initiated.

The daily feed rate of bark & wood waste, No. 6 fuel oil, knots and any other fuel shall be measured and recorded.

# Sulfur Dioxide Emissions Control Systems

## Brief Description of the System

The oxides of sulfur found in the flue gases are removed with a wet scrubber. The wet scrubber is a venturi type device. Flue gas is accelerated through a nozzle and deluged with a scrubbing liquid. The scrubbing liquid is a solution of caustic soda.

Spray nozzles are arranged in the tower to spray the scrubbing liquor into the flue gas. The spray nozzles are full cone non-clogging nozzles.

When the scrubbing liquor comes in contact with sulfur dioxide in the flue gas, the sulfur dioxide is converted and then removed from the aqueous stream.

The scrubber features a high amount of active surface area with random dumped packing. The packing material breaks the liquid streams into multiple, even surface films that create intimate gas/liquid contact at a low-pressure drop. The Scrubber is expected to remove greater than 90% of the Sulfur Dioxide entering the vessel.

## Maintenance and Inspection

All systems and equipment are set up for routine preventative maintenance inspections and or calibrations.

Operators inspect all critical equipment for any type of defect on a daily basis.

Deficiencies that cannot be corrected by the operator are to be appropriately recorded and reported so that necessary repairs may be made in a timely manner.

A complete inspection of all aspects of the scrubber will be made during each maintenance repair shutdown.

Scrubber spray chambers and nozzles will be inspected regularly to ensure they are not plugged.

The packing section will be inspected often to ensure against solids buildup that would plug portions of the pack.

The scrubber mist eliminator will also be inspected on a regular basis. The catchment on a chevron baffle can become filled with solids, rendering it ineffective.

The scrubber recirculation system will be kept reasonably clean to ensure the solution is capable of gas absorption; to minimize buildup of solids in packed and mist eliminator sections; and to prevent plugging of spray chambers and nozzles.

A continuous addition of water, up to five pct of the total recirculation rate will be added to the recirculation tank and simultaneously overflowed to waste treatment.

The recirculation tank will also be kept clean of sediment. These solids are easily stirred up and will inevitably contribute to plugging of spray nozzles, packing sections and the mist eliminator section.

## Monitoring of Operations and Records

A log will be maintained of all observations, deviations and corrective actions taken for a period of five years.

The wet scrubber will be equipped with devices to continuously measure the scrubber water flow rate and the differential pressure drop across the scrubber demister pads. The wet scrubber monitoring devices used to continuously measure the scrubber water flow

rate and the differential pressure drop across the scrubber demister pads shall be observed with a frequency of not less than once per day.

Each monitoring device will be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. If the manufacturer's written requirements or recommendations are not available, Rayonier will establish the written procedures.

Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the control device is operating.

# Nitrogen Dioxide Emissions Control Systems

## Selective Non-Catalytic Reduction

### Brief Description of the System

The design of the bubbling fluidized bed combustor minimizes nitrogen oxide formation. However, nozzle ports for an SNCR [selective non-catalytic reduction] system are provided on the boiler in case the NOX emissions are higher than expected. The remainder of the SNCR system will be installed only if there are unforeseen problems with NOX emissions.

### Maintenance and Inspection

None planned.

### Monitoring of Operations and Records

A CEM for nitrogen compounds is installed on the boiler's final emissions. Records of the duration and occurrence of startups, shutdowns, and malfunctions of the boiler and associated air emission control systems and any period during which the continuous monitoring system is inoperative shall be recorded and the record maintained for a period of five years. A record of SNCR downtime due to any maintenance activity shall be maintained if installed.

The continuous emission monitoring system (CEMS) will be installed for the determination of a gas or particulate matter concentration or emission rate using pollutant analyzer measurements and a conversion equation, graph, and computer program to produce results in units of the applicable emission limitation or standard. The system will measure emissions of NO<sub>x</sub>, SO<sub>2</sub>, CO<sub>2</sub>, oxygen and opacity.

The CEM system will comply with all Federal and State requirements that may apply. Specifically, the system complies with 40CFR60. The CEM system will meet all monitoring and reporting requirements outlined in the Title V Permit.

Performance Specifications will be used for evaluating the acceptability of the CEMS at the time of or soon after installation and whenever specified in the regulations. All performance tests must be completed within 30 days after the emission source has begun operation. These reports should contain all pertinent data regarding performance testing.

Quality assurance procedures will be used to evaluate the effectiveness of quality control (QC) and quality assurance (QA) procedures and the quality of data produced by the CEM that will be used for determining compliance with the emission standards on a continuous basis as specified in the applicable regulation.



## Particulate Control Devices

### Electrostatic Precipitator

#### Brief Description of the System

The dust laden gases are drawn into one side of the Electrostatic Precipitator Chamber where high voltage electrodes impart a negative charge to the particles entrained in the gas. These negatively charged particles are then attracted to a grounded collecting surface, which is positively charged. The gas then leaves the box up to 99 % cleaner than when it entered.

Inside the Electrostatic Precipitator Chamber , the particles from the continuing flow of dust build up on the collecting plates. At periodic intervals, the plates are rapped, causing the particles to fall into hoppers. The particles are then removed from the hoppers, by a rotary screw arrangement. The Design Basis for the Electrostatic Precipitator is listed in the table below:

Volume (ACFM)	240,000
Temperature (°F)	400
H2O in flue gas (% by vol.)	15
Inlet to precipitator (gr/dscf)	2.5
Emission Rate (lbs/MMBTU)	0.025
Heat Input ( MMBTU/hr)	450

#### Maintenance and Inspection

The air emission Electrostatic Precipitator system, and the collection systems are to be inspected daily for leakage, for defects which would affect operation, and for potential defects which would affect operation.

A daily inspection will be performed for the following:

- Inspection of rapper operation
- Inspection of T-R set operation
- Inspection of ash removal system operation

Corrective action measures will be implemented on the occurrence of an abnormal condition. Abnormal conditions will include the following: a T-R set failure, rapper system failure, ash transport system failure, and high ash hopper level.

## Each Major Unit Overhaul

Check and correct plate electrode alignment  
Inspect for collection surface fouling  
Inspect T-R set mechanical condition  
Inspect internal structural components

Corrective action measures will be devised and implemented on the occurrence of an abnormal condition. The appropriate measures for remediation will be implemented in a timely manner.

### **Monitoring of Operations and Records**

The operator has a graphic display for continuous monitoring of the system and trends of those operating parameter. Appropriate alarms are provided for out of range operations. All meters are set up on the mill's preventative maintenance system for transmitter calibrations. The operator has instantaneous and averaged readouts.

We will maintain a written or electronic record of all inspections and any action resulting from the inspection. Maintenance and inspection records will be kept for five (5) years and available upon request.

An audible Precipitator Malfunction Alarm is available for the operator. The precipitator malfunction alarm will continuously monitor T-R set failure and rapper control malfunction. Corrective action measures will be implemented on the occurrence of a precipitator malfunction alarm. The appropriate measures for remediation will be implemented in a timely manner.

Approximately once each month the data is automatically down loaded, consolidated into 15-minute averages and stored in the mill's data management system. The 15-minute averages are stored for 5 years

## ATTACHMENT 10 - PB06 – Description of Stack Sampling Facilities

The Stack and Sampling Platforms and Ports have been designed at the submittal of this application. However, the stack sampling facilities will meet the Requirements of Appendix SS1 to the Title V Permit. The applicable portions of that document are referenced below.

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1. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. Emissions units must provide these facilities at their expense. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E. A permanent stack sampling facility will be installed and maintained.

2. Sampling Ports.

a. All sampling ports will have a minimum inside diameter of 3 inches.

b. The ports shall be capable of being sealed when not in use.

c. The sampling ports will be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.

3. At least two sampling ports, 90 degrees apart, will be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, will be installed. On horizontal circular ducts, the ports will be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.

4. On rectangular ducts, the cross sectional area will be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports will be provided which allow access to each sampling point. The ports will be located so that the probe can be inserted perpendicular to the gas flow.

5. Work Platforms.

a. Minimum size of the working platform will be 24 square feet in area. Platforms will be at least 3 feet wide.

b. On circular stacks with 2 sampling ports, the platform will extend at least 110 degrees around the stack.

c. On circular stacks with more than two sampling ports, the work platform will extend 360 degrees around the stack.

d. All platforms will be equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports will be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.

6. Access to Work Platform.

a. Ladders to the work platform exceeding 15 feet in length will have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.

b. Walkways over free-fall areas will be equipped with safety rails and toeboards.

7. Electrical Power.

a. A minimum of two 120-volt AC, 20-amp outlets will be provided at the sampling platform within 20 feet of each sampling port.

b. If extension cords are used to provide the electrical power, they will be kept on the plant's property and be available immediately upon request by sampling personnel.

8. Sampling Equipment Support.

a. A three-quarter inch eyebolt and an angle bracket will be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

i.. The bracket will be a standard 3 inch x 3 inch x one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter will be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket will be located 14 inches above the centerline of the sampling port.

ii. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt will be located 15 and one-half inches above the centerline of the sampling port.

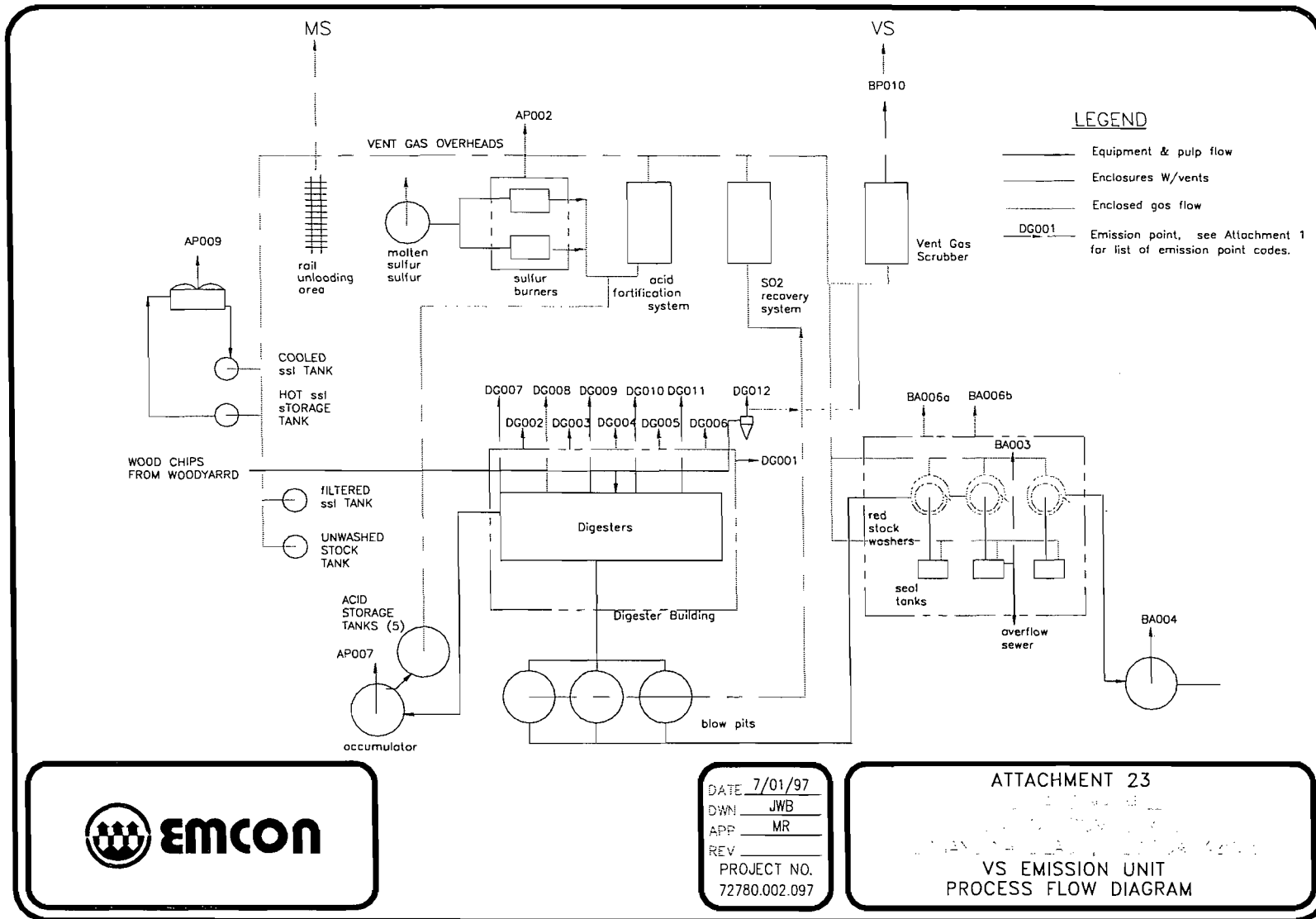
iii. The three-quarter inch eyebolt will be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt will be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt will be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain will be attached to it to bring the free end of the chain to within safe reach from the platform.

b. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

c. When the sample ports are located in the top of a horizontal duct, a frame will be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

ES-NCR/CADD: K:\CADD\JAX\72780002.097\003.dwg Xref: <NONE>  
 Scale: 1 = 1.00 DimScale: 1 = 2.00 Date: 7/15/97 Time: 10:18 AM Operator: JBRUCE



DATE 7/01/97  
 DWN JWB  
 APP MR  
 REV  
 PROJECT NO.  
 72780.002.097

ATTACHMENT 23  
 VS EMISSION UNIT  
 PROCESS FLOW DIAGRAM

## **ATTACHMENT 12 - PG Detailed Description of Control Equipment**

### VENT GAS SCRUBBER STACK - Digester and Washing Systems Vents

#### Sulfur Dioxide Control

Emissions from the cooking acid plant, the red stock washers, the unwashed stock tank, and the spent sulfite liquor tanks are collected and scrubbed in the vent gas scrubber. The vent gas scrubber consists of a packed tower containing 6 feet of poured packing. Gas flows upward through the packing. Absorbate is sprayed onto the top of the packing and continues a tortuous path downward through the packing to the bottom of the tower. Sodium bisulfite/sulfite absorbate is pumped from the tower sump to the sodium bisulfite storage tank. The loop is completed when the absorbate is pumped from the storage tank back to the top tray of the vent gas scrubber with a pH control addition of fresh caustic soda.

The liquid level in the tower sump is controlled by a PID type instrument in the acid plant distributive control system (DCS). A continuous sample of absorbate from the bottom of the tower is pumped to a pH instrument. The pH signal in the DCS controls the addition of fresh 7 percent caustic soda solution or 9 percent soda ash solution into the absorbate stream entering the top tray. The controller set point is normally pH 6.5. The pH set point may be increased to respond to an unusually high gas loading into the vent gas scrubber. The sulfur dioxide concentration in the stack is measured with a continuous emission monitor. The DCS calculates one hour, three hour and 24 hour running averages of the sulfur dioxide concentration.

#### Methanol Control

A trap-out ring is installed at the top of the bottom section of this tower to separate the lower sulfur dioxide scrubber from the new after condenser above. A new section containing 6 feet of packing functions as a direct contact condenser using fresh raw water. A shower distributes the fresh water over the packing. The flow of water must be once through to maintain a low enough concentration of methanol in the liquid to assure that it does not return to the gas phase. The liquid is sent directly to the sewer system and on to secondary treatment. The water addition is controlled to assure the exit gas temperature from the tower is maintained at a specified set point. This assures adequate capture of methanol by the condenser.

**ATTACHMENT 5 TO APPLICATION**

**PROJECT DESCRIPTION  
AND  
RULE APPLICABILITY ANALYSIS**

**FOR**

**SIP CONSTRUCTION PERMIT FOR A NEW NUMBER 6  
BUBBLING BED BOILER REPLACING ALL EXISTING  
POWER BOILERS,**

**AND**

**RE-EVALUATION OF THE INSTALLATION OF No. 6  
DIGESTER WITH A PRODUCTION INCREASE TO  
175,000 ADMT**

**RAYONIER PERFORMANCE FIBERS LLC  
FERNANDINA BEACH DISSOLVING SULFITE MILL**

**Submitted  
August 30, 2005**

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## 1.0 APPLICATION DESCRIPTION

### 1.1 *Boiler Project Description*

Rayonier is planning to replace three existing power boilers at its Fernandina Beach dissolving sulfite pulp mill with one bubbling bed boiler. Self produced bark will provide most of the fuel, but knots, landscape waste and possibly a small amount of tire derived fuel will be fired at times. Minimal oil will be fired, mostly during periods when the solid fuel feed system is down. The mill has three small power boilers, all were installed prior to 1962, and therefore are not BART or NSPS eligible, nor are there NSR concerns with these boilers. Power Boiler No. 1, Title V Emission Unit PB01, is fired with residual oil only and has a heat input of 185mmBtu/hr. Power Boiler No. 2, Title V Emission Unit PB02, is fired with bark and residual oil and has a heat input of 218 mmBtu/hr. Power Boiler No. 3, Title V Emission Unit PB03, is fired with bark and residual oil and has a heat input of 245 mmBtu/hr. These boilers are aging and maintenance costs have escalated to the point where replacement is cost effective. They will be decommissioned and therefore the emissions from these boilers will be used to offset the emissions from the replacement boiler. The replacement boiler will be designated PB06.

A used traveling grate boiler will be purchased which will be converted into a bubbling bed boiler equipped with an ESP followed by an alkaline scrubber. Provisions will be made to install Selective Non-Catalytic Reduction (“SNCR”) for NOX control should it be necessary to meet the emission limit proposed. It should not be needed to meet the NSPS limits as the boiler remains subject to the pre 1983 Subpart D standard as described in Section 2.0 below.

A similar conversion as successfully accomplished at Interstate Paper Company in Riceboro, Georgia. The boiler will be sized for 265,000 lbs of 900 psi steam per hour at 850 degrees Fahrenheit resulting in an annual average heat input of 450 mmBtu/hr. Occasionally heat inputs could be 525 mmBtu to partially compensate for outages of the recovery boiler, the only

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other steam generator at the facility. However an annual emission limit based on 450 mmBtu/hr is requested.

It will be located adjacent to the digesters east of the mill. A mill plot plan is included as Attachment 1 to the Construction Permit Application Form. Once constructed and fully operational, it will be connected to the mill steam headers. It and the recovery boiler will be the sole steam producers used by the mill. Eventually the existing boilers will be dismantled.

A newer boiler will reduce most emissions because it will have to meet more stringent New Source Performance Standards ("NSPS"), (40 CFR Part 60 Subpart D) and the recently promulgated Maximum Available Control Technology Standards ("Boiler MACT", 40 CFR Part 63, Subpart DDDDD for existing power boilers). The boiler being purchased was originally constructed in 1983. In Section 2.1 of this narrative a reconstruction analysis demonstrates this boiler has not been reconstructed. Therefore, it remains subject to the Subpart D standard, the NSPS promulgated at the time the boiler was constructed, and not Subpart Db, which applies to boilers constructed or reconstructed after July 9, 1989. Not being reconstructed also means the boiler is regarded as an existing boiler under Boiler MACT. These two rules will be discussed in greater detail in Sections 2.2 and 2.3 below.

A large electrostatic precipitator (ESP) for the removal of particulate matter followed by an alkali scrubber for the removal of SO<sub>2</sub> will be installed to enable the boiler to meet the new emission limits. The technology used in the boiler and its new large pollution control devices will enable compliance with the new regulations referenced above and will allow a greater percentage of bark and possibly other solid fuels such as Tire Derived Fuel (TDF) in the fuel mix.

Continuous NO<sub>x</sub>, SO<sub>2</sub>, flow CO, O<sub>2</sub> and opacity monitors are proposed for the new boiler. The monitoring to be included with this project is fully described in section 2.5.

---

## **1.2 Production Increase Project Description**

This permit application also includes a production increase to accommodate the full production enabled by the installation of no. 6 digester in 1998. An industry-wide effort to inspect, repair and upgrade digesters was begun in the late 1990's following an explosion of a digester at the Stone Container Mill in Panama City, FL, now owned by Smurfit. Rayonier undertook a program to entirely reline each of its existing 5 digesters with new refractory and replace any weakened or corroded metal while it was exposed. To accomplish this Rayonier rotated a digester out of production for an extended period of time. In order to avoid lost production for orders previously taken an additional (no. 6) digester was added. Permitting of no. 6 digester was facilitated by inclusion of a production limit on the Title V operating permit of 153,205 ADMT per year. This application revisits that production limit and seeks to increase that limit to the full production capability of No.6 digester. This permitting action is more fully described in Chapter 3.0.

No changes to the mill layout are needed to achieve the production increase. Minimal additional equipment will be needed to achieve the modest production increase requested in this application. Instead of adding evaporators and the energy to run them the existing evaporators can be unloaded by concentrating some streams with non-emitting nanofiltration technology. Some additional drying capacity will be needed on the dryer section of the pulp machine. These modifications and equipment additions will take place over 5 to 10 years. Commencing construction in 18 months or 2 years is no longer a requirement as none of the changes required PSD permits which have the limit on when construction must commence. To ensure VOC emissions increases are less than the PSD Significance Level the mill will undertake a project to capture blow heat from one of the bleach plant stages that is the most significant VOC emissions source. In capturing this heat the VOCs will also be captured and sent to the biological wastewater treatment system for destruction.

## **1.3 Construction Permit Application Organization**

Applicable regulations for each project are analyzed separately in the following two sections of this narrative statement. Because a Construction Permit can be issued faster than the

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simultaneous Construction and Title V permit and onsite construction must begin by November 2005, this is only a SIP construction application. After issuance of the Construction Permit, a Title V operating permit application will follow.

#### **1.4 Schedule**

Options have been secured on an existing boiler, presently configured for coal firing. Rayonier has begun engineering studies on relocating the boiler and the ancillary equipment to the Fernandina Beach mill site and replacing the coal firing equipment with a new fluidized bed for biomass fuel. These studies are expected to approach completion in September 2005. On-site work will begin late third quarter or early fourth quarter of 2005. Total installation time is expected to be about 18 months. Startup is planned for early 2007.

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## **2.0 No. 6 BOILER PROJECT**

### **2.1 RECONSTRUCTION ANALYSIS**

In the regulatory analysis that follows it is important to determine if the boiler is considered new or existing as different emission limits apply. Simply moving the boiler does not automatically make the boiler a new boiler under either NSPS or MACT. A facility must either be constructed or modified or reconstructed to become subject to NSPS and the new source provisions under MACT. Both Title 40 Parts 60 and 63 have similar definitions of affected source and reconstruction.

Because Rayonier will invest capital to modify and replace certain boiler internals as well as move the boiler from Jacksonville to Fernandina Beach, a reconstruction analysis was performed to determine if the fixed capital costs being invested in this boiler exceeds 50 percent of the cost of a comparable entirely new facility. If reconstructed the boiler will lose its status as an existing boiler and be considered a new boiler for purposes of NSPS and Boiler MACT.

#### **2.1.1 Reconstruction Analysis Guidance**

Reconstruction is defined as the replacement of components that exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility. Both NSPS and Boiler MACT have similar definitions of reconstruction, thus only one Reconstruction Analysis is presented. The reconstruction question in the applicability requirement for both NSPS in Section 2.2 and MACT in Section 2.3 will refer back to this analysis.

EPA Applicability Determinations Index Numbers NA12, 0200048 and NB28 provide guidance for completing a Reconstruction Analysis. According to the definition one compares the fixed capital assets being invested to the fixed capital assets required for a "comparable entirely new facility" (See Reconstruction Definition 40 CFR 60.15). However, not all fixed

capital assets are included in the analysis. Applicability Index NB28 states that stacks, site preparation, demolition, boiler cranes, station piping, water purification equipment, water supply systems, air cleaning systems and cooling systems and almost anything to do with a turbogenerator are excluded from the analysis. It further states that air pollution control equipment is only included if it is needed as part of the manufacturing/operating process. It would not be possible today to permit the proposed boiler without the scrubbers, ESP and stack, but this equipment is not needed for the operation of the boiler and has been excluded from the analysis. Ash handling equipment was excluded after the ash discharge valves to the ash hopper. Labor and engineering cost have been included per Applicability Determination Index Number 0200048. As Applicability Determination Index Number NB28 suggests, the units constituting the facility which are in or out of the analysis may be best represented in a diagram. Such a diagram is included in Figure 1 below.

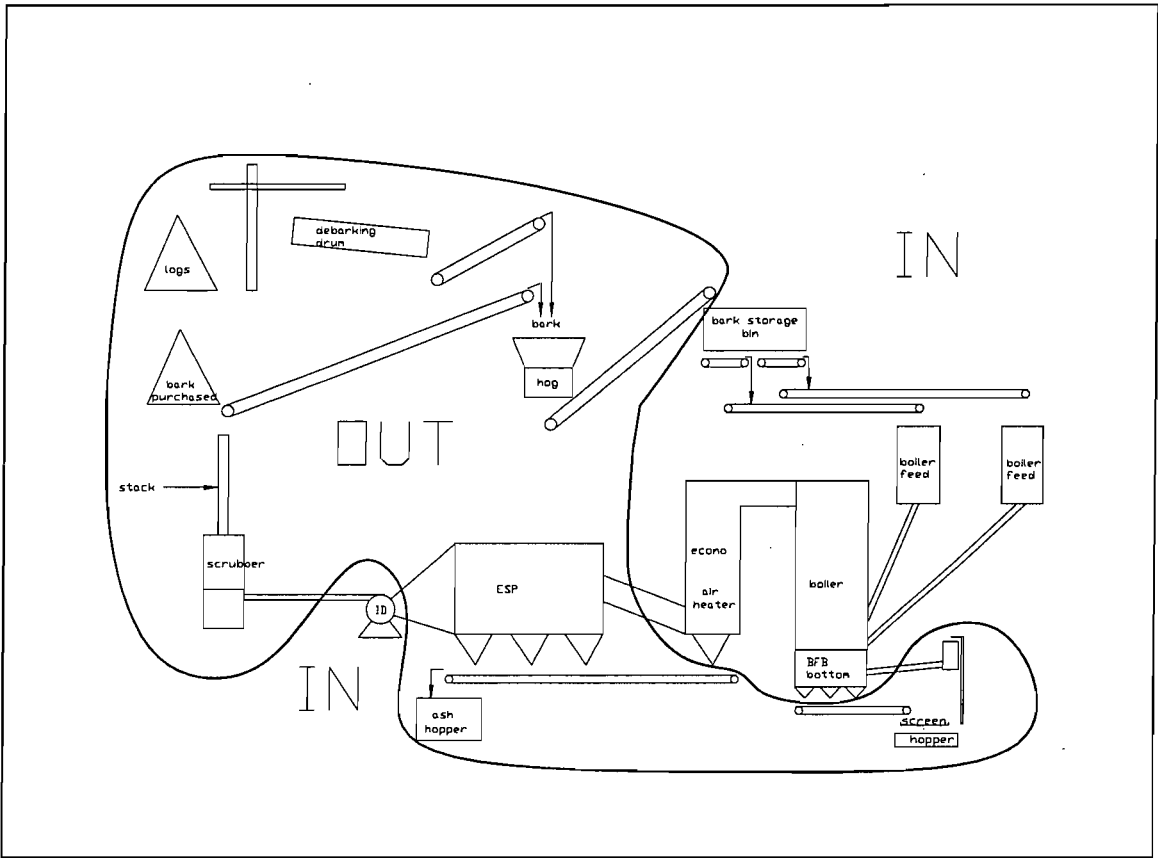


Figure 1: Extent of Reconstruction Analysis

Two approaches to estimating the cost for a comparable, entirely new facility were used. First, Rayonier was fortunate to acquire the original records for the boiler purchase and installation. These records were used to estimate the cost at the time of construction which was adjusted for those items included in and excluded from the analysis as described by EPA Guidance referenced above. These costs were then escalated to present day dollars. To this was added the new parts needed for the conversion from coal to bubbling fluidized bed.

Second, a quote for a boiler and equipment was obtained from a vendor. The quote was augmented by our engineering firm to include the foundations, buildings etc. needed to service the boiler but excluded from the vendor's quote. Both analyses are presented below.

### 2.1.2 Rayonier Projected fixed Capital Spending on this Project

Table 1 is Rayonier's budget for this project that has been adjusted to remove those items that are excluded from a Reconstruction Analysis according to the EPA Guidance referenced above. Total Fixed Capital Costs being invested in this project are then \$13,882,000.

**Table 1. No. 6 Boiler Reconstruction Analysis Fixed Capital Costs**

Foundation	\$ 454,000
Dismantling and Freight Costs	\$ 680,000
Building Retrofitting/Re-Erection	\$ 2,141,000
Boiler Pressure Parts & Installation	\$ 2,459,000
Feedwater System	\$ 253,000
Pressure-Part Trim	\$ 250,000
Heat Exchangers	\$ 1,150,000
BFB Bottom Unit	\$ 1,600,000
Oil Burner Systems	\$ 375,000
Sand Reclaim & Recirculation System	\$ 563,000
Furnace Trim	\$ 510,000
Fluidizing Air System	\$ 282,000
Over-Fire Air system	\$ 328,000
Gas Stream	\$ 404,000
Bark Feed System	\$ 401,000
Electrical	\$ 1,335,000
Controls/ Instrumentation	\$ 325,000
DCS	\$ 200,000
Misc. Project Services	\$ 172,000
<b>TOTAL</b>	<b>\$ 13,882,000</b>



This reconstruction cost must be compared to the fixed capital costs for a comparable entirely new facility.

### 2.1.3 New Facility Cost Based on Escalated 1983 Costs

Rayonier was fortunate to obtain the original 1983 installation records for the used boiler being purchased. This cost information was adjusted to remove the coal burning and ash handling equipment, the pollution control equipment and the stack per EPA Applicability Determination Index No. NB28. This cost in 1983 dollars was then escalated to 2004 dollars using the Chemical Engineering Plant Cost Index ratio for the period of 1983 to 2004 of 1.40. To this cost was added the cost of the new bark handling equipment and a BFB bottom design in 2005 dollars. This analysis is presented in Table 2 below which indicates \$ 39,155,000 as the cost for a comparable entirely new facility in 2004 dollars.

**Table 2. Cost of a Comparable Entirely New Facility in 2005 adjusted from 1983**

1983	1983 Capital Estimate	\$ 29,334,000
-	Coal Handling System	\$ (1,831,000)
-	Stoker Bottom System	\$ (713,000)
-	Scrubber Stack	\$ (974,000)
-	Dust Collector	\$ (43,000)
1983	Total Boiler Cost	\$ 25,773,000
2004	Adjusted Cost (Chemical Eng Plant Cost Index)	\$ 36,126,000
+	Bark Storage Bin/Live Bottoms/VF Drives	\$ 1,170,000
+	BFB	\$ 1,600,000
+	Fluidizing Air System	\$ 259,000
	<b>COMPARABLE NEW PROJECT ESTIMATE</b>	<b>\$ 39,155,000</b>

Percent reconstructed =  $\$13,882,000 / \$39,155,000 = 35\%$

This analysis indicates that only 35 percent of a comparable entirely new facility is being spent on this project and thus it is not a reconstructed facility. Therefore, the boiler maintains its status as an existing facility as of 1983.

### 2.1.4 New Facility Cost Based on Recent Quote

As an alternative to the analysis presented above, the Kaverner Corporation was approached for a quote on a new comparable boiler. Their quote included air pollution control systems and stack and a complete ash system. Their quote did not include foundations, buildings, piping and electrical nor any installation costs. Projects for Industry, Rayonier's engineer for the project, then estimated, or acquired quotes for, the missing capital costs not included in the Kaverner Quote and subtracted those items not to be included per the applicability guidance sited above.

Kaverner Corp bid proposal	\$ 21,136,000
Plus	
Boiler vendor erection costs	\$ 11,438,000
Foundations	\$ 454,000
Bark Delivery	\$ 435,000
Boiler Building Steel	\$ 3,100,000
Concrete Floors/Buildings	\$ 670,000
Fire Protection	\$ 160,000
Boiler Utilities Piping	\$ 260,000
Electrical	\$ 2,400,000
DCS System	\$ 650,000
Engineering	\$ 1,500,000
Site Services	\$ 172,000
Minus	
ESP	\$ 1,930,000
150 foot stack	\$ 180,000
Ash system	\$ 186,000
SNCR equipment in vendor quote	\$ 265,000
<b>Grand Total Comparable Entirely New</b>	<b>\$ 39,814,000</b>

Estimated Cost of project from Table 1 \$13,882,000

Percent reconstructed = \$ 13,882,000 / \$39,814,000 = 35%

### 2.1.5 Rule of Thumb Estimation of New Boiler Costs

Boiler manufacturers through experience have developed 'rules of thumb' for estimating costs for new boilers. Generally \$150,000 per 1000 pounds per hour of steam capacity is used for estimating the capital cost of similar high pressure boilers. Using this method a similar all new

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boiler would cost \$39,750,000 which compares favorably with the estimates arrived at by the two specific methods above.

It must be remembered that all three of these approaches represent estimates only. Generally the estimates are high to allow for some unforeseen difficulty such as equipment defects, weather delays, delays in delivery of needed parts etc.

## **2.2 BOILER NEW SOURCE PERFORMANCE STANDARDS**

### **2.2.1 40 CFR Part 60 Subpart D, Da and Db Boiler Applicability**

The Federal New Source Performance Standards (NSPS) authorized by Section 111 of the Federal Clean Air Act are found in 40 CFR Part 60. Subpart D of Part 60 applies to steam generators (boilers, especially those using fossil fuel) and was adopted in June 14, 1974 applying to boilers constructed or reconstructed after August 17, 1971. (NSPS is somewhat unique in that it begins applying to sources when proposed and not beginning with final promulgation.) Subpart D was in effect at the time this boiler was constructed and applied to this boiler when constructed.

Somewhat later in June 11, 1979 Subpart Da, was adopted and applied to electric utility steam generators constructed or reconstructed after September 18, 1978. An electric utility steam generator is defined as one selling more than 25 megawatts or one third of the electrical power generated. The mill has the ability to sell electricity to the grid, but Rayonier will not sell more than 25 megawatts nor will it sell one third of the generating capacity of the mill or about 15 megawatts. Subpart Da does not apply to this project.

Subpart Db applies to Industrial, Commercial and Institutional boilers having greater than 100 mmBtu/hr heat input constructed or reconstructed after June 19, 1984 and was adopted in December 16, 1989. This boiler was constructed before June 19, 1984 therefore Subpart Db does not apply, unless the boiler is considered reconstructed or modified. If the boiler were considered reconstructed or modified Subpart Db would apply and not Subpart D.

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### **2.2.2 Is the Boiler Reconstructed Under NSPS?**

The Reconstruction Analysis presented in Section 2.0 demonstrated that the work planned by Rayonier does not trigger reconstruction.

### **2.2.3 Is the Boiler Modified Under NSPS?**

The 40 CFR Part 60 regulations define modification as any action resulting in any increase for any pollutant for which there is a standard. As the new owner Rayonier has no knowledge of previous emissions of this boiler. Therefore, its emissions have been estimated at the previous permit limits. It is reasonable to expect this boiler was operated close to its limits as pollutant removal equipment as was used to achieve them. Pollution control equipment enables close control of ultimate emissions and it is reasonable to expect that those controlled emissions were close to the limits. Indeed 40 CFR 60.8 requires operation at the maximum rate of production before a compliance test for NSPS can be run. This maximum rate of operation is limited by NSPS.

The emission limits imposed by the 40 CFR Part 60, Subpart D in 1983 are presented in Table 3 below. Table 3 also presents the expected new limits. All of the new limits are equal to or less than the old limits. Therefore the relocation and reengineering of this boiler is not considered a modification.

The mandatory scrubbing of SO<sub>2</sub> to achieve an additional 90% reduction had not been adopted in 1983. However, because this boiler burned coal, scrubbing for SO<sub>2</sub> and for NO<sub>x</sub> was mandatory to meet the NSPS limits. Scrubbing is not mandatory to meet the limits when the fuel consists mostly of bark with some liquid fossil fuel (No. 6 oil).

**Table 3. 40 CFR Part 60 Subpart D limits in 1983**

<b>Pollutant</b>	<b>Limit in lbs/mmBtu unless indicated</b>	<b>Expected New Limit in lbs/mmBtu unless indicated</b>
PM	0.1	0.07
Opacity	=<20% except 6/hour<27%	=<20% except 6/hr<27%
SO2 solid fossil fuel	1.2	NA
SO2 liquid fossil fuel	0.8	0.8
NOx	0.3	0.3 <sup>1</sup>

<sup>1</sup>For NSR purposes the facility will be accepting a lower limit for NO<sub>x</sub>.

Emissions from the boiler after installation will not be greater than those before this project as listed in Table 3. Therefore no modification has taken place and the boiler maintains its classification as an existing boiler under 40 CFR Part 60 subpart Db and constructed after June 14, 1974 and before June 19, 1984 and remains subject to the limits in Subpart D.

## **2.3 BOILER MACT STANDARD APPLICABILITY**

### **2.3.1 40 CFR Part 63, Subpart DDDDD**

EPA promulgated 40 CFR Part 63, Subpart DDDDD in the September 14, 2005 Federal Register with a compliance date of September 13, 2007 for existing boilers and upon startup for new boilers. This rule imposes MACT (Maximum Achievable Control Technology) limits for Hazardous Air Pollutants (HAPs). Particulate Matter is used as a surrogate for the 8 metal HAPs that are the target of the standard. An alternative standard is provided allowing a facility to choose whether it is to be limited by total particulates or a limit for the 8 metal HAPs. Boiler MACT also limits mercury and hydrogen chlorine emissions from all boilers and carbon monoxide emissions are limited from new boilers only. See Table 4 below.

**Table 4. 40 CFR Part 63, Subpart DDDDD Limits For Existing Boilers**

<b>Pollutant</b>	<b>Limit - Existing</b>
Particulate	0.07 lb/mmBtu
8 metal HAPs	0.001 lb/mmBtu
Hydrogen Chloride	0.09 lb/mmBtu
Mercury	0.000009 lb/mmBtu
Carbon Monoxide <sup>7</sup>	None
Opacity	None if wet scrubber Use ESP parameters

### **2.3.2 Is No. 6 Boiler Reconstructed Under Boiler MACT**

If sufficient capital is invested in changes to an emission unit it may be reconstructed. Similar to NSPS, if reconstructed, it is considered new. Part 63 (MACT) and Part 60 (NSPS) use the same definition for reconstruction. The General Provisions of Part 63 were amended on April 5, 2002 to clarify that relocated existing sources retain their existing source status (absent reconstruction) and do not become subject to new source MACT.

The reconstruction analysis for the boiler was presented in section 2.0 above. This boiler has not been reconstructed. It was originally constructed in 1983 and unless considered modified is subject to the existing boiler Subpart DDDDD standards.

### **2.3.3 Is No. 6 Boiler Modified Under Boiler MACT**

The MACT standards do not define a modification. A facility is constructed or is reconstructed after promulgation and therefore it is a new source, otherwise it is an existing source. The boiler is not reconstructed (See Section 2.0) The MACT limits for existing boilers apply to this boiler.

### **2.3.4 Will No. 6 Boiler meet new Boiler MACT Limits**

An existing boiler must comply with the limits in Table 5 by September 13, 2007. The facility then has 180 days to prove compliance by testing. At least 60 days prior to the compliance performance test, a Site Specific Monitoring Plan must be submitted. The Site Specific Monitoring Plan must state the limits, how the facility will demonstrate compliance with the

limits and how they will be monitored on an on-going basis. It is early to provide such a Monitoring Plan as there is no experience with the reconfigured boiler. It is not required at this time because this is regarded as an existing boiler. A Monitoring Plan will be provided prior to May 2008, six months following the compliance date. This boiler is not scheduled to commence operation until early 2007.

The ESP is designed to meet the particulate limit of 0.07 lbs./mmBtu with some margin of safety. Since there is a wet alkali scrubber following the ESP prior to the stack, the opacity limits do not apply.

An attempt will be made to use the fuel analysis option to demonstrate ongoing compliance as allowed by the rule. In this option a facility is allowed to demonstrate that it meets the rule if all selected metals listed in the rule found in a worse case fuel mix are assumed to be emitted at a rate less than the limit. At the very minimum the fuel analysis option will be used for mercury and hydrogen chloride compliance. If the fuel analysis option is used, a Fuel Analysis Plan is required to be submitted at least 60 days prior to beginning the fuel analysis. Anticipated emissions are given in Table 5 below along with the limits for existing boilers. The analysis of available data from the literature for mercury and chlorine in fuels is included in Table 6 below. This demonstrates that even with Tire Derived Fuel, the Fuel Analysis Option will demonstrate compliance with the mercury and hydrogen chloride limits.

**Table 5. Boiler MACT and Expected Emissions from No. 6 Boiler**

<b>Pollutant</b>	<b>Boiler MACT Limits</b>	<b>Predicted Emissions Boiler MACT Pollutants</b>
Particulate	0.07 lb/mmBtu	0.07 lb/mmBtu
8 metal HAPs	0.001 lb/mmBtu	unknown
Hydrogen Chloride	0.090 lb/mmBtu	0.019 lb/mmBtu
Mercury	0.0000090 lb/mmBtu	0.0000016 lb/mmBtu
Carbon Monoxide	None	<400 ppm @ 7% O <sub>2</sub> 30 day average
Opacity	None if wet scrubber Use ESP parameters	None – wet scrubber

**Table 6. Boiler MACT Analysis for HCl and Hg Compliance.**

BOILER MACT FUEL ANALYSIS								
	%	Ton/hr	Btu/lb	HCl (lb/mmBTU)	mmBTU/hr	lb. HCl/hr	Hg (lb/mmBTU)	lb. Hg/hr
Bark	70	36.0	5,100	0.0103	367.2	3.78210	0.000001420	0.000521424
TDF	10	2.5	15,500	0.0730	77.5	5.65750	0.000003720	0.000288300
#6 Oil			18,000	0.0075	0.0	0.00000		0.000000000
Lndsep Wst	10	5.0	5,100	0.0070	51.0	0.35700	0.000000451	0.000023001
Knots	10	3.5	4,300	0.0070	30.1	0.21070	0.000000451	0.000013580
<b>TOTAL</b>					525.8	10.00736		0.000846300
				<b>HCl</b>			<b>Mercury</b>	
<b>Actual</b>				0.0190 lb/mmBTU			0.0000016 lb/mmBtu	
<b>Limit</b>				0.0900			0.0000090	

If the option for the alternate limit for selected metals cannot be used, ESP field parameters ranges will be developed during initial compliance testing and will be used as surrogate parameters to monitor compliance. A wet alkali scrubber, installed primarily for sulfur dioxide control, will also capture hydrogen chloride.

## **2.4 NSR APPLICABILITY TO THE BOILER PROJECT**

### **2.4.1 Existing Emissions**

Except for NOx emissions, Table 7 below presents the latest five years of annual emissions as reported in the Annual Operating Report (“AOR”) submitted to the Department annually every March 1. Over the years the basis for calculating emissions has changed for some pollutants and those changes are documented in Appendix A. Baseline periods comprising two consecutive years are averaged for each pollutant. Generally the two consecutive years of maximum production have been averaged to determine baseline emissions, as we believe these years are most representative of normal operations. However, a 2004 test for CO indicated lower emissions than predicted from emissions factors and thus a later 2003-2004 baseline is used. The SO2, NOx and VOC baseline was selected to reflect the maximum oil usage as it is



the major source of these emissions. The NO<sub>x</sub> emissions have been changed from the AOR as further described below. Baseline years have been selected to reflect what the facility actually emitted in the recent past using the best data available. The facility makes many different grades of pulp, each having its own emission characteristics. Generally the highest emissions are selected so that the facility will not be restricted as to the grade of pulp it can manufacture.

**Table 7. TPY Emission of Boiler Relevant Regulated Pollutants last 5 years**

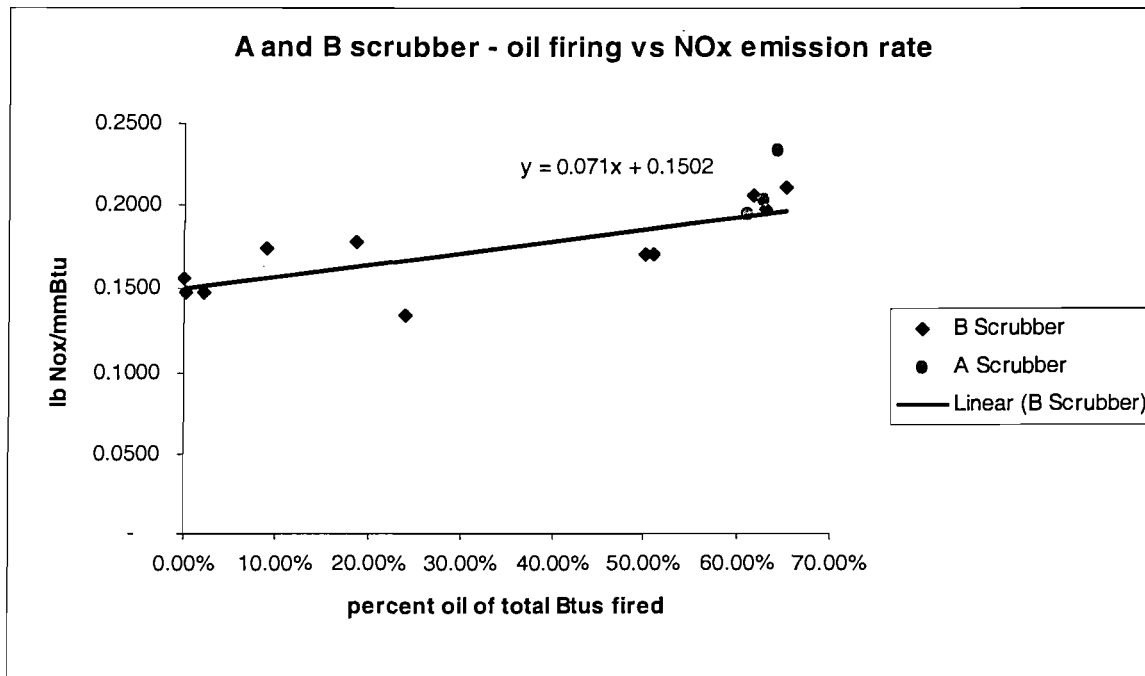
<b>Year</b>	<b>2004 TPY</b>	<b>2003 TPY</b>	<b>2002 TPY</b>	<b>2001 TPY</b>	<b>2000 TPY</b>	<b>Baseline years</b>	<b>Avg. Baseline years</b>
PM	220.29	176.39	258.35	235.14	316.98	00-01	276.06
PM 10	195.37	156.24	228.95	208.40	276.56	00-01	242.48
SO <sub>2</sub>	99.33	130.31	171.21	192.70	162.73	01-02	181.96
NO <sub>x</sub>	298.80	328.75	336.91	345.00	*	01-02	340.95
CO	647.14	734.35	780.72	805.89	855.46	03-04	690.75
VOC	42.78	48.66	51.58	53.21	23.97	01-02	52.40

\*A steam measurement for this year was not available for calculating annual NO<sub>x</sub> emissions.

In previous AORs the NO<sub>x</sub> emission was calculated using AP42 Emission Factors. These factors indicate NO<sub>x</sub> varies with oil fired as well as other boiler characteristics. The mill has two boiler stacks each equipped with a venturi scrubber. Power boiler Nos. 1 and 2 both vent to the stack and venturi scrubber designated A. Power boiler No. 3 vents to stack and scrubber B. A total of 14 tests for NO<sub>x</sub> have been conducted on the 2 stacks. Figure 2 demonstrates the relationship between oil fired and NO<sub>x</sub> emissions. Stack tests of both boiler stacks determined there were fewer NO<sub>x</sub> emissions than reported in the AOR.

No. 1 boiler is fired with oil only. Nos. 2 and 3 boilers are fired with a mixture of oil and waste wood, generally bark. Most stack tests are focused on particulate emissions and thus are run with a minimum of oil and a maximum of bark, which minimizes the NO<sub>x</sub> emissions. Numbers 1 and 2 power boilers are always fired with a high percentage of oil because Number 1 power boiler is only oil fired. Fuel records show that on an annual average about 62 percent of the heat input is from oil for No. 1 and 2 boilers and 17 percent for No. 3 boiler. From Figure 2,

the NO<sub>x</sub> emission rates for the A stack are 0.2 lbs/mmBtu based on recent tests and for B stack is 0.1623 lb NO<sub>x</sub>/mmBtu.



**Figure 2 Tested NO<sub>x</sub> Emissions versus Percent Oil in Fuel Fired**

Efficiencies for each boiler during the fourteen tests for NO<sub>x</sub> presented above were examined. Annual steam production for each boiler from 2001 through 2004 was also examined. Heat inputs were calculated from F-factors as were NO<sub>x</sub> emission rates. Table 8 presents the steam made during each test and the heat input so that an efficiency is calculated. This efficiency is used to calculate the heat input for annual steam production, and using the NO<sub>x</sub> emission rates from Figure 2 annual NO<sub>x</sub> emissions are calculated for each year for which there are accurate steam measurements – 2001 through 2004. The adjusted NO<sub>x</sub> baseline of 340.95 is presented in Table 7 and in Table 9 as the average of emissions in years 2001 and 2002, the two consecutive highest years.

**Table 8. Efficiency of Boiler during Test**

Date	Test Run	Time Begin	Time End	Scrubber	Heat in Steam Produced during Test mmBtu/hr	Heat Input from F-Factor mmBtu/hr	Efficiency	Average Efficiency
6/10/2004	1	12:00	13:00	A	176.00	270.42	65%	
6/10/2004	2	14:41	15:41	A	170.46	265.42	64%	
6/10/2004	3	17:34	18:34	A	169.91	252.65	67%	66%
6/9/2004	1	12:27	13:56	B	126.07	278.62	45%	
6/9/2004	2	15:00	16:39	B	122.52	228.92	54%	
6/9/2004	3	17:51	18:51	B	113.52	232.76	49%	
7/8/2005	1	8:59	9:59	B	112.28	216.55	52%	
7/8/2005	2	10:22	11:22	B	110.28	214.80	51%	
7/8/2005	3	11:38	12:38	B	110.14	227.54	48%	
7/8/2005	4	13:58	14:58	B	134.81	254.76	53%	
7/8/2005	5	15:09	16:11	B	136.07	261.30	52%	
7/14/2005	1	9:00	10:00	B	123.39	236.25	52%	
7/14/2005	2	10:17	11:17	B	119.18	223.11	53%	
7/14/2005	3	11:37	12:37	B	133.69	238.51	56%	51%

The average efficiency for A stack, Nos. 1 and 2 boilers, is 66% and for B stack, No. 3 boiler, is 51%.

Table 9. Annual NO<sub>x</sub> Emissions Recalculated

Boiler	Energy in Steam Produced mmBtu/yr	Efficiency	Annual Heat Input mmBtu/yr	NO <sub>x</sub> Emissions
<b>2001</b>				
				<b>TPY</b>
A	1,284,146.99	66%	1,959,978.25	196.00
B	944,517.56	51%	1,836,189.02	149.01
<b>Total</b>				<b>345.00</b>
<b>2002</b>				
A	1,284,167.28	66%	1,960,009.22	196.00
B	893,189.45	51%	1,736,404.63	140.91
<b>Total</b>				<b>336.91</b>
<b>2003</b>				
A	1,189,099.78	66%	1,814,908.83	181.49
B	933,427.43	51%	1,814,629.26	147.26
<b>Total</b>				<b>328.75</b>
<b>2004</b>				
A	1,121,154.39	66%	1,711,204.59	171.12
B	809,314.27	51%	1,573,347.12	127.68
<b>Total</b>				<b>298.80</b>

## 2.4.2 Emission Increases/Decreases due to No. 6 Boiler

Section 2.2 discussed the applicability of the Federal New Source Performance Standards (NSPS) that apply to the boiler, found at 40 CFR Part 60 Subpart D. Table 3 presented the applicable emission limits. Section 2.3 discussed the Boiler MACT Standards found at 40 CFR Part 63, Subpart DDDDD. Table 4 presented the applicable emission limits of this standard.

In reviewing the projected emission rates based on the two applicable emission standards, NSPS and Boiler MACT, and comparing potential emissions to the baseline emission in Table 7 it was determined that NO<sub>x</sub> and SO<sub>2</sub> annual emissions will exceed the PSD Significance Levels. Annual emissions from all other pollutants will decrease. In order for this project to avoid PSD permitting the facility is willing to accept a NO<sub>x</sub> emission limit of 379.95 tons per year annual average and a SO<sub>2</sub> emission limit of 220.95 tons per year annual average. This emission rate is based on 8760 hours per year operation.

**Table 10. No. 6 Power Boiler Emissions**

<b>Pollutant</b>	<b>Source of limit</b>	<b>Emission rate lb/mmBTU</b>	<b>Potential Emission ton/year</b>	<b>Baseline Emissions ton/yr</b>	<b>Emission Change ton/yr</b>	<b>PSD Significance Level</b>
PM	Boiler MACT	0.07	138	276.06	(138)	25
PM10	PM as PM10	0.07	138	242.48	(105)	15
SO <sub>2</sub>	ESCPSD	0.1121 ann. avg.	220.95	181.96	39	40
NO <sub>x</sub>	NSPS	0.1928 ann. avg.	379.95	340.95	39	40
CO	None	- 0.2 -	99	690.75	(591)	100
VOC	None	- 0 -	- 1 -	52.40	(45)	40

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## **2.5 EMISSION MONITORING FOR No. 6 BOILER**

### **2.5.1 Emission Monitoring Required by NSPS**

40 CFR 60.45, the specific regulation requiring monitors for boilers subject to Subpart D requires the installation of Opacity, SO<sub>2</sub> and NO<sub>x</sub> monitors along with either O<sub>2</sub> or CO monitors and the capability of converting the continuous emissions monitoring data to lb/mmBtu units. The boiler will be equipped with CEMs for SO<sub>2</sub> and NO<sub>x</sub> meeting Performance Specifications 2 and 3 found in Appendix B of that Part. Both an oxygen monitor and a carbon monoxide monitor will be used, though the carbon monoxide monitor is not required. Because this boiler will have a final alkali scrubber just before the stack, the opacity monitor will be installed after the ESP and before the scrubber. How this will effect compliance determinations is yet to be determined.

### **2.5.2 Emission Monitoring Required by Boiler MACT**

Boiler MACT requires opacity monitors on a dry stack, but this boiler will be equipped with a final alkaline scrubber, making a wet plume on which opacity monitors can not be used. As stated above, an opacity monitor will be located between the ESP and the scrubber. However, provisions will also be made for continuous monitoring of the field amperage and voltage on the ESP and pressure drop and flow on the final scrubber should it be required because the fuel analysis option in boiler MACT is not available.

### **2.5.3 Monitoring Required to Track NSR Requirements**

The mill is proposing a CAP on NO<sub>x</sub> and SO<sub>2</sub> emissions less than the limit allowed by NSPS. This CAP is on an annual basis, not to exceed an annual average NO<sub>x</sub> emission of 394.74 tons per year and an annual average SO<sub>2</sub> emissions of 220.95 tons per year. The NO<sub>x</sub> monitoring equipment installed to meet the NSPS requirements above will accumulate continuous NO<sub>x</sub> data on a lb/mmBtu basis. Running annual averages will be available daily. This is appropriate because the CAP is taken to avoid PSD which measures significance in terms of annual emissions. Other regulations require NO<sub>x</sub> monitors. This monitoring will also require monitoring stack gas flow. Gas flow will be monitored by an ultrasonic type flow monitor so that flow can be continuously determined to calculate annual NO<sub>x</sub> and SO<sub>2</sub> emissions.

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### **3.0 PRODUCTION INCREASE FOR No 6 DIGESTER**

As described in the Introduction in Chapter 1.0, the mill accepted a production cap to facilitate the installation of an additional digester. At the time, extensive inspections and maintenance was required on all digesters in the industry following the loss of a digester at another pulp and paper mill in Florida. Inspections and rebricking of each digester involved outages that would have interrupted production and delayed order delivery to customers. To avoid possibly losing customers the mill quickly added no. 6 digester to the 5 existing digesters so that one could be out-of-service and the same number still function. Thus enabling the mill to maintain the planned level of production for the year to match sales.

Soon all digesters will be repaired. Improvements in market position have created an opportunity to make use of some of the production capability the added digester enabled. Full utilization of the digester would achieve 175,000 ADMT per year or about 16.7 percent increase over that baseline 1996 production (149,957 ADMT). This production rate increase is driven mainly by an increase in market demand. Several market changes have caused an increase in demand for our product. Most importantly a major competitor has closed its mill in Mississippi and left the dissolving pulp business. Some of those customers are now buying pulp from this facility. As the price of petroleum increases there is an increase in demand for plastics from cellulose. Finally, markets for some new electronic products that use pulp produced by this facility are increasing. It is essential that the mill move now to meet this demand growth to keep its customers, meet growing foreign competition and maintain domestic jobs.

There is no New Source Performance Standard that applies to sulfite mills. 40 CFR Part 63, Subpart S, the Pulp and Paper MACT standards, does apply to sulfite mills. Under this standard there are slightly different standards for new and existing sources. Modifications are not included in the rule. Sources are either new, being constructed or reconstruction, or are

existing sources. A reconstruction analysis is addressed but because one digester compared to the rest of the pulping segment is small a complete reconstruction analysis was not completed.

40 CFR 52.21(r)(4) requires that once a source has taken limit to avoid PSD permitting it must review the permit as if the construction has not occurred. Because emission reductions pursuant to Part 63, Subpart S were mandated a revised baseline of 2002/2003 was used to calculate what actual emissions increase would be as a result of the production increase. To comply with 40 CFR 52.21(r)(4) the same 1996 baseline production rate was used similar to the 1998 original digester permit but emissions rates from 2002/2003 were used and increased on a percentage basis to account for the production increase.

This production increase project is entirely separate from the power boiler project. These two projects are combined in this application to minimize application review time and eliminate duplicative application processing. As will be shown under the power boiler and recovery boiler discussion in subsection 3.3.1 and 3.3.2 below, the existing power boilers and the recovery boiler both have the ability to produce the steam needed for this production rate, and can therefore be excluded from this analysis pursuant to 40 CFR 52.21(b)(ii)(c).

### **3.1 METHOD OF OPERATION AND EQUIPMENT CHANGES**

The mill will not change its method of operation. It will of course change the rate of operation of the existing equipment. All of the pulping and bleaching emissions increases and decreases are accounted for in Table 13. Although the mill can produce more pulp than the present limit without any additional equipment, some additional equipment and upgrades to existing equipment will be required to achieve the 175,000 ADMT rate. The emission increases from all of this equipment is accounted for in Table 13. The following equipment will be added in approximately the following order: numerous upgrades on the existing pulp machine (none will increase emissions and most involve increasing the steam pressure in the drying section and increasing the lineal machine speed), an additional post HCE washer, installation of nanofiltration of certain streams to recover caustic and relieve the evaporators of evaporating the caustic liquors so they can be dedicated to evaporating red liquor, a new HCE cell in



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addition to the 8 existing cells (this will be controlled as part of the HCE blow heat recovery system), a new pre HCE thickener and possibly a new ClO<sub>2</sub> tower.

The production increase will increase VOC emissions, most of which come from the HCE blow gases. This production increase includes a project to install heat recovery of the hot gases blown from the HCE cells. These are similar to kraft digesters but do not use sulfur compounds in the reaction process and therefore do not have the TRS gases. Emissions are steam and VOCs, mostly methanol. Blow heat recovery will cool these gases until most of the VOCs condense. The heat will be used elsewhere in the process and the captured VOCs will end up in the wastewater treatment system. Predicting the exact capture at the HCE blow heat recovery system and the escape using WATER9, at the treatment system is extremely difficult. More than 75% of the bleach plant emissions come from this source. This analysis conservatively assumes that only 50% of those emissions will be captured and destroyed in the wastewater treatment system.

### **3.2 RECONSTRUCTION ANALYSIS**

A detailed reconstruction analysis similar to that presented for No. 6 boiler is not needed. No. 6 digester is part of a very large digester system that includes blow tanks, heat exchangers, and columns for the capture and reuse of SO<sub>2</sub>. Only the digester itself is new, but it cannot function without the rest of the system. Furthermore, The Subpart S MACT standards apply to the entire pulping and washer lines, in fact to the whole mill. It should be immediately obvious that the capital cost of adding one digester does not approach 50% of the cost of replacing the entire pulping line let alone the mill.

### **3.3 DIGESTER NEW SOURCE PERFORMANCE STANDARDS**

There are no NSPS standards that apply to sulfite mills.

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### **3.4 PULPING MACT 40 CFR PART 63 SUBPART S**

EPA promulgated 40 CFR Part 63, Subpart S in the April 15, 1998 Federal Register with an effective date of April 15, 2001. This rule applies to kraft, sulfite and other wood pulping processes and establishes a limit on the VOC HAPs from digester systems, pulp washing systems and liquor recovery systems, and waste water treatment systems (if used as the method to achieve the limits). Methanol is used as a surrogate. For sulfite mills total methanol emissions may not exceed 2.2 pounds per oven dry unbleached short ton of chemical pulp produced.

The existing digester system at this facility was required to meet the limits in 40 CFR Part 63, Subpart S by April 15, 2001. Rayonier Fernandina Beach Mill chose to install direct contact methanol condensers on the emission point venting the combined digester and washing systems, on the vent for the evaporator non-condensables and to use biological treatment to destroy the VOC HAPs (methanol) collected in the water used in the condensers. Reported elsewhere are the results of numerous annual tests demonstrating that the mill meets the Subpart S MACT standards.

Both the digester/washer system condenser and the evaporator system condenser are sized to operate at full capacity of both systems. Both condensers are capable of handling the increased methanol loading and maintaining present methanol emission levels. The recovery boiler, the largest source, has tested in compliance at the increased production operating rate. More condenser water may be used and that has not been finally quantified. At the higher production rate new parameter curves will be produced and submitted as part of the continuing Compliance Methodology, now part of the renewed Title V permit for the mill.

In any event the mill will remain subject to the Subpart S MACT limit of 2.2 lbs of methanol per Oven Dry Unbleached Short Ton of pulp produced. The point is that no changes to the existing control equipment will be necessary to maintain compliance.

### **3.5 NSR APPLICABILITY**

Because the addition of No. 6 digester avoided PSD in 1998 by accepting a production limit as a surrogate to limiting emissions, 40 CFR 52.21(r)(4) applies and requires a review of PSD as if the No. 6 digester has not yet been installed.

(4) At such time that a particular source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements or paragraphs (j) through (s) of this section shall apply to the source or modification as though construction had not yet commenced on the source or modification.

To satisfy the 40 CFR 52.21(r)(4) requirement, this analysis used the same baseline production used in 1998 for the original PSD analysis for No. 6 digester. The baseline production for No. 6 digester analysis was the 1996 net production of 149,957 ADMT. A production increase to 175,000 ADMT/yr represents a 16.70 percent increase. Emission changes are calculated as a percentage of the increase in production over that used for the analysis for No.6 digester. Each relevant pollutant for each emitting mill segment has baseline emissions determined based on 2002/2003 emissions and those emissions are increased by 16.70 percent. The increase is compared to the Significance Level. If the increase is less than the Significance Level no PSD review is required for that pollutant.

Baseline emissions have been taken from the Annual Operation Report and are presented in Table 11 below. Previous reported emissions for VOCs, except for 2002, contain emissions now required to be controlled and therefore were not used to develop the baseline. The MACT Subpart S standards were complied with in April 2001. Reported emissions after this point include the required emission reductions.

There are five mill segments that have emissions, the power boilers, the recovery boiler, the pulping system vent (vent gas scrubber), the bleach plant vents and the evaporator system vent. As will be demonstrated below the existing power boilers and recovery boiler have the capability to achieve and have achieved operation rates consistent with the 175,000 ADMT

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production rate and will not only be increasing their rate of operation and thus are exempt from the this PSD review. The pulping segment, the bleach plant and the evaporators are being debottlenecked and these segments are analyzed for emissions increases.

### **3.5.1 Recovery Boiler**

The recovery boiler is permitted at an operating rate of firing 70,000 lb of red liquor solids per hour. It has operated at this rate from time to time and has been repeatedly tested at this rate. It has therefore shown itself capable of operating at this rate. It does not on average operate at this rate because of market conditions. Nevertheless, 40 CFR 52.21(b)(41)(ii)(c), recently adopted revisions to the New Source Review applicability determinations, specifically allows the exemption from projected actual emissions increases in emission that could have been accommodated.

40 CFR 52.21(b)(41)(ii)(c) .....Shall exclude, in calculating any increase in emissions that results from the particular project, that portion of the unit's emissions following the project that an existing unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions under paragraph (b)(48) of this section and that are also unrelated to the particular project, including any increased utilization due to product demand growth;

It should be noted that this has been the law since the WEPCO (893 F2nd 901, 1990) which involved a utility boiler and EPA has merely recognized this by expanding the demand growth concept to cover industrial boilers in the new regulation cited above. The recovery boiler could have accommodated the operating rate of 70,000 lbs/hr. The permitted firing rate is 70,000 lbs/hr red liquor solids and it has been tested at that rate. The most recent performance tests for methanol compliance in May 2004 are presented in Table 11 below. The mill assured the methanol capture system for the evaporators was adequately designed for this rate and for each methanol compliance test both the boiler and evaporators were operated at the 70,000 lb/hr rate. No capital expenditure was needed to operate the recovery boiler at 70,000 lbs./hour, and this increase in the rate of production is purely driven by market demand. Therefore, pursuant to 40 CFR 52.21(b)(41)(ii)(c) the emission increases from the recovery boiler that will be experienced by a physical change (the added digester) will not be included in the calculation of

whether any increase in emission attributable to the production increase exceeds the Significance Level.

**Table 11. Recovery Boiler and Evaporator Operating Rates During Tests**

Test Date and Time	Solids to Recovery Boiler lb/hr	Solids to Evaporators lbs/hr	Test Date and Time	Solids to Recovery Boiler lb/hr	Solids to Evaporators lbs/hr	
9/18/1996	70,399	No evaporator data recorded during these tests	5/7/2002	66,375		
	68,580			64,162		
	73,411			65,192		
9/18/1996	71,538			4/14/2003	62,954	
	69,905				65,603	
	67,551				69,677	
9/8/1998	64,777				69,257	
	61,164			4/15/2003	69,489	
	62,005			5/20/2004	69,000	70,000
11/2/1999	65,697				70,000	70,000
	64,619				70,000	70,000
	64,447			5/21/2004	68,000	72,000
4/5/2000	61,429				68,000	72,000
	63,299				67,000	69,000
	62,756			5/24/2004	70,000	71,000
5/1/2001	65,881					
	64,473					
	61,706					

*Handwritten notes:*  
 68,425  
 2003-2004  
 68,425 / 70,000 = 99.18%  
 (4)

### 3.5.2 Power Boilers

It has already been shown from the above application regarding the new power boiler that even at full potential operating rate the boiler does not trigger PSD. Pursuant to 40 CFR 52.21(b)(41)(ii)(c) it is necessary to demonstrate that the existing boilers as well as the boiler replacing them has the capability to support the projected market demand and need not be included in the emission increase calculus. Table 12 presents data to demonstrate that the existing power boilers have the capability as well as the rated capacity to operate at the 265,000 lbs of steam per hour rate. It is worth note that this Table also demonstrates why the two projects covered by this application are separate and completely unrelated because this table shows that the production increase could be accomplished without the installation of No. 6 boiler.

**Table 12. Annual Average Steam Production by Boiler (thousands of pounds)**

<b>Boiler</b>	<b>Capacity KLb Steam/hr</b>	<b>1998</b>	<b>1999</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>
1	120	89	85	69	74	80	74	59
2	120	82	107	74	80	80	76	69
3	135	106	109	107	114	106	108	92
Total	375	278	302	240	268	266	259	220
Production ADMT/yr		132,016	119,689	151,515	146,247	145,895	144,976	145,883

Table 12 demonstrates that not only do the existing power boilers have the permitted capacity, but have operated at rates exceeding the rate being permitted in Power Boiler Number 6. It also demonstrates the successful efforts made by the facility to improve the energy efficiency as more pulp is made with less energy. One of the benefits of the project to capture the HCE blow gas heat, in addition to the reduction in VOC emissions, will be to capture more lost heat to further improve energy efficiency.

### **3.5.3 Pulping System Vent (Vent Gas Scrubber)**

Sulfur dioxide and VOCs are the two pollutants having applicable PSD significance levels emitted from this collection of emission units associated with pulping and washing.

Table 13 below presents annual sulfur dioxide and VOC baseline emissions and the calculated increase from the production increase.

### **3.5.4 Bleaching System Vent**

Both VOCs and Carbon Monoxide (CO) from the use of ClO<sub>2</sub> bleaching are emitted from this source. The VOC emissions have been taken from the Annual Operating Report. The CO emissions have been calculated using NCASI Technical Bulletins No. 701 Compilation of Air Toxic and Total Hydrocarbon Emissions for Sources at Chemical Wood Pulp Mills, and No. 760, "Carbon Monoxide Emissions from Oxygen Delignification and Chlorine Dioxide Bleaching of Wood Pulp".

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VOC emissions have been calculated using testing of certain high VOC emitting stages and trade association emission factors. Over 80% of bleach plant VOCs come from one specific stage and most of this is methanol. This stage involves a cooking process, after which the pulp is blown to a tank that is vented to atmosphere. The heat is wasted. This application involves the installation of a blow heat recovery system that will also capture methanol other VOCs with similar or higher boiler points. It is estimated that 50% of the methanol would be captured by this project. Other methanol control systems using similar processes, direct contact condensation and closed conveyance systems achieve much greater reductions, so this estimate is considered conservative.

A production increase to 175,000 ADMT would cause VOC emissions to increase more than the PSD Significance Level. However, a production increase to 162,000 would clearly not as it is only an 8% increase and the 8% increases of all related emissions does not cause the total emissions increase to exceed the PSD Significance Level. This is shown on Table 13 as the 8% increase. However, with the above mentioned project VOC emissions will decrease even with the production increase to 175,000 ADMT/yr. This application is requesting that the production increase be limited to 162,000 ADMT per year until the installation of the HCE blow heat recovery system.

Carbon monoxide emissions have been estimated using the NCASI Technical Bulletins referenced above. There are no emission factors that separate out chlorine stages from chlorine dioxide stages. The facility uses both. Chlorine stages produce little to no CO. ClO<sub>2</sub> stages produce a maximum depending on the lignin content of the entering pulp and the ClO<sub>2</sub> charged, but only up to a certain point. Technical Bulletin 760 indicates that CO emissions remained fairly constant between 0.59 and 0.73 kg/ODMTUB when increasing ClO<sub>2</sub> substitution. This is equivalent to 1.606 lb/ODMTUP. At 175,000 ADMT finished pulp is equivalent to 218,750 ODMTUP. As a conservative analysis this application used 1.606 lbCO/ODMTUP and determined that CO emissions would increase by 25.12 tons per year. This is less than the PSD Significance Level of 100 tons per year.

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### **3.5.5 Evaporator System Vent**

The emissions from this source are based on the required methanol performance tests. They have been increased by 16.70 percent to account for the production increase.

### **3.5.6 Wastewater Treatment System Emissions**

The emissions from the wastewater treatment system have been taken from the annual report. These emissions are determined using WATER9 similar to its use to determine compliance with the Subpart S MACT rule. They have been increased by 16.70 percent to account for the production increase.



**Table 13. Pulping, Bleaching, Evaporation, Wastewater Systems SO<sub>2</sub> and VOC Emissions in TPY from 16.70% Production Increase**

Year	VOC	SO <sub>2</sub>	CO
<b>Pulping Systems (VGS)</b>			
2000		79.00	0
2001		51.84	0
2002		21.36	0
2003	26.72	13.34	0
2004	46.52	11.25	0
Baseline	36.62	65.42	NA
Increase 8%	2.930	10.925	0
Increase 16.70%	6.116	10.925	
<b>Bleaching Systems</b>			
2003	178.17	0	
2004	177.84	0	
Baseline	178.00	NA	
HCE blow heat recovery	(71.20)		
Increase 8% no heat recovery project	14.24		
Increase 16.70% and recovery project	(41.47)		25.12
<b>Evaporators</b>			
2003	50.72	0	0
2004	56.72	0	0
Baseline	53.72	NA	NA
Increase 8%	4.297	0	0
Increase 16.70%	8.971		
<b>Wastewater Treatment System</b>			
2003	76.89	0	0
2004	55.64	0	0
Baseline	66.26	NA	NA
Increase 8%	5.301	0	0
Increase 16.70%	11.065		
Grand Total at 8% increase and no heat recovery project	26.77	10.925	
Grand Total at 16.70% increase and heat recovery project / no RB project	(15.318) 44,813		25.12
Significance Level	40	40	100

44,813 ↑ VOC

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From Table 13 it can be determined that the proposed increase in production will not cause an increase in applicable pollutants beyond the Significance Level. Therefore, this PSD analysis of the installation of No. 6 digester along with a production increase from 149,947 ADMT per year to 175,000 ADMT per year will not require a PSD permit.

The production increase is included in the construction permit application.

## APPENDIX A

Emissions Source	Fuel Type	Parameter	Source of Annual Operating Report Emissions for 2004	Any variances from the 2004 source in preceding years.
No. 1 PB	Oil	CO	AP 42 emissions factor.	Same source for preceding years.
No. 1 PB	Oil	NOX	AP 42 emissions factor.	Same source for preceding years.
No. 1 PB	Oil	SO2	Calculated from actual oil burned, % sulfur analyses and the scrubber SO2 removal efficiency.	Same source for preceding years.
No. 1 PB	Oil	PM	1999 special testing determined the ratio of PM from No. 1 PB to the total PM measured during the A-scrubber stack test. A-scrubber receives flue gas from No. 1 and No. 2 PB. This ratio and the actual A-scrubber PM emissions are used to calculate the No. 1 PB emissions in pounds/hr. This value is then multiplied by the actual hours operated for No. 1 PB.	Same source for preceding years.
No. 1 PB	Oil	PM10	The AP42 ratio of PM10 to PM is multiplied by the PM emissions.	Same source for preceding years.
No. 1 PB	Oil	VOC	AP42 emissions factor.	Same source for preceding years.
No. 1 PB	Oil	MeOH	Methanol was tested from all three power boilers in 1991 at 0.75 lb/hr. This value is prorated by the fuel type, heat input rate and actual operating hours to each boiler. The source of the methanol is likely the recycled mill process water used in the scrubber.	Same for 2001-2003. No estimates for methanol were made for 2000.
No. 2 PB	Oil	CO	AP 42 emissions factor.	Same source for preceding years.
No. 2 PB	Oil	NOX	AP 42 emissions factor.	Same source for preceding years.
No. 2 PB	Oil	SO2	Calculated from actual oil burned, % sulfur analyses and the scrubber SO2 removal efficiency.	Same source for preceding years.
No. 2 PB	Oil	PM	AP42 emissions factor multiplied by the A-Scrubber PM removal efficiency.	Same source for preceding years.
No. 2 PB	Oil	PM10	AP42 emissions factor multiplied by the A-Scrubber PM removal efficiency.	Same source for preceding years.
No. 2 PB	Oil	VOC	AP42 emissions factor.	Same source for preceding years.

Emissions Source	Fuel Type	Parameter	Source of Annual Operating Report Emissions for 2004	Any variances from the 2004 source in preceding years.
No. 2 PB	Oil	MeOH	Methanol was tested from all three power boilers in 1991 at 0.75 lb/hr. This value is prorated by the fuel type, heat input rate and actual operating hours to each boiler. The source of the methanol is likely the recycled mill process water used in the scrubber.	Same for 2001-2003. No estimates for methanol were made for 2000.
No. 2 PB	Bark	CO	2004 test of A- Scrubber minus the CO from oil burning calculated for No. 1 and No. 2 boilers.	2000 – 2003 by AP42 emissions factor.
No. 2 PB	Bark	NOX	2004 test of A- Scrubber minus the NOX from oil burning calculated for No. 1 and No. 2 boilers.	2000 – 2003 by AP42 emissions factor.
No. 2 PB	Bark	SO2	AP42 emissions factor times the SO2 removal efficiency of the A-Scrubber.	Same source for preceding years.
No. 2 PB	Bark	PM	Actual A-scrubber PM test emissions multiplied by the actual operating hours minus No. 1 and No. 2 PB oil PM emissions.	Same source for preceding years.
No. 2 PB	Bark	PM10	The AP42 ratio of PM10 to PM is multiplied by the PM emissions.	Same source for preceding years.
No. 2 PB	Bark	VOC	AP42 emissions factor.	Same source for preceding years.
No. 2 PB	Bark	MeOH	Methanol was tested from all three power boilers in 1991 at 0.75 lb/hr. This value is prorated by the fuel type, heat input rate and actual operating hours to each boiler. The source of the methanol is likely the recycled mill process water used in the scrubber.	Same for 2001-2003. No estimates for methanol were made for 2000.

Emissions Source	Fuel Type	Parameter	Source of Annual Operating Report Emissions for 2004	Any variances from the 2004 source in preceding years.
No. 3 PB	Oil	CO	AP 42 emissions factor.	Same source for preceding years.
No. 3 PB	Oil	NOX	AP 42 emissions factor.	Same source for preceding years.
No. 3 PB	Oil	SO2	Calculated from actual oil burned, % sulfur analyses and the scrubber SO2 removal efficiency.	Same source for preceding years.
No. 3 PB	Oil	PM	AP42 emissions factor multiplied by the B-scrubber PM removal efficiency.	Same source for preceding years.
No. 3 PB	Oil	PM10	AP42 emissions factor multiplied by the B-scrubber PM removal efficiency.	Same source for preceding years.
No. 3 PB	Oil	VOC	AP42 emissions factor.	Same source for preceding years.
No. 3 PB	Oil	MeOH	Methanol was tested from all three power boilers in 1991 at 0.75 lb/hr. This value is prorated by the fuel type, heat input rate and actual operating hours to each boiler. The source of the methanol is likely the recycled mill process water used in the scrubber.	Same for 2001-2003. No estimates for methanol were made for 2000.
No. 3 PB	Bark	CO	2004 test of B- Scrubber minus the CO from oil burning calculated for No. 3 boiler.	2000 – 2003 by AP42 emissions factor.
No. 3 PB	Bark	NOX	2004 test of B- Scrubber minus the NOX from oil burning calculated for No. 3 boiler.	2000 – 2003 by AP42 emissions factor.
No. 3 PB	Bark	SO2	AP42 emissions factor times the SO2 removal efficiency of the A-Scrubber.	Same source for preceding years.
No. 3 PB	Bark	PM	Actual B-scrubber PM test emissions multiplied by the actual operating hours minus No. 3 oil PM emissions.	Same source for preceding years.
No. 3 PB	Bark	PM10	The AP42 ratio of PM10 to PM is multiplied by the PM emissions.	Same source for preceding years.
No. 3 PB	Bark	VOC	AP42 emissions factor.	Same source for preceding years.

Emissions Source	Fuel Type	Parameter	Source of Annual Operating Report Emissions for 2004	Any variances from the 2004 source in preceding years.
No. 3 PB	Bark	MeOH	Methanol was tested from all three power boilers in 1991 at 0.75 lb/hr. This value is prorated by the fuel type, heat input rate and actual operating hours to each boiler. The source of the methanol is likely the recycled mill process water used in the scrubber.	Same for 2001-2003. No estimates for methanol were made for 2000.
Rec. Boil.	Oil	CO	AP42 emissions factor.	Same source for preceding years.
Rec. Boil.	Oil	NOX	AP42 emissions factor.	Same source for preceding years.
Rec. Boil.	Oil	SO2	Calculated from actual oil burned, % sulfur analyses and the scrubber SO2 removal efficiency.	Same source for preceding years.
Rec. Boil.	Oil	PM	AP42 emissions factor multiplied by the recovery scrubber PM removal efficiency.	Same source for preceding years.
Rec. Boil.	Oil	PM10	AP42 emissions factor multiplied by the recovery scrubber PM removal efficiency.	Same source for preceding years.
Rec. Boil.	Oil	VOC	AP42 emissions factor.	Same source for preceding years.
Rec. Boil.	Oil	MeOH	Assumed to be zero from oil burning.	
Rec. Boil.	SSLS	CO	Actual ppmV CO readings from the boiler's CO CMS & annual stack test flue gas volume flow rate are used to calculate the tons CO/yr. Then the oil burning CO is subtracted from this value.	2003 same as 2004. 2000-2002 used 1995 tests for CO ppmV.
Rec. Boil.	SSLS	NOX	2004 testing ppmV NOX readings and annual stack test flue gas volume flow rate are used to calculate the tons NOX/yr. Then the oil burning NOX is subtracted from this value.	2000-2003: 1995 test data used for NOX ppmV.
Rec. Boil.	SSLS	SO2	Actual ppmV SO2 reading from the boiler's SO2 CEM & annual stack test flue gas volume flow rate are used to calculate the tons SO2/yr. Then the oil burning SO2 is subtracted from this value.	Same source for preceding years.

Emissions Source	Fuel Type	Parameter	Source of Annual Operating Report Emissions for 2004	Any variances from the 2004 source in preceding years.
Rec. Boil.	SSLS	PM	Annual stack test PM lb/hr and actual operating hours are used along with a ratio of the annual average liquor burning rate to the stack test liquor burning rate.	Same 2002 & 2003. For 2000-2001 the stack test liquor burning rate was used; no compensation for annual average burn rate.
Rec. Boil.	SSLS	PM10	Utilized bark burning AP42 ration of PM10 to PM and the actual PM emissions.	Same source for preceding years.
Rec. Boil.	SSLS	VOC	Measured methanol emissions divided by a literature based ration of methanol to VOC for spent sulfite liquor evaporators of 0.95.	2003 same as 2004. 2000-2002 by AP42 emissions factor.
Rec. Boil.	SSLS	MeOH	Annual methanol emissions test in lb/ODUBT pulp multiplied by actual ODUBT/yr. These emissions are actually from the evaporator methanol condenser discharge, which is piped to the recovery boiler scrubber.	Same for 2002 & 2003. 2000-2001 based on an average of 1991- report year testing for lb MeOH/ODUBT.
Pulping	Pulp Prod.	SO2	Actual ppmV SO2 reading from the vent gas scrubber SO2 CEM & flue gas volume flow rate from previous testing [from constant flow fan] are used to calculate the tons SO2/yr.	Same source for preceding years.
Pulping	Pulp Prod.	MeOH	Annual methanol emissions test in lb/ODUBT pulp multiplied by actual ODUBT/yr.	Same for 2002 & 2003. 2000-2001 based on an average of 1991- report year testing for lb MeOH/ODUBT.
Pulping	Pulp Prod.	VOC	Sum of all HAPs for which there are test data or emissions factors and are included as VOC under FAC 62.24.200 using actual pulp production or liquor burned values.	Same 2001 – 2003. For 2000, VOC assumed to equal methanol divided by a literature MeOH/VOC ratio.
Bleaching	Pulp Prod.	VOC	VOC is assumed to be equal to methanol in the bleach plant.	Same for 2003. No bleaching VOC estimate for 2000-2002.

<b>Emissions Source</b>	<b>Fuel Type</b>	<b>Parameter</b>	<b>Source of Annual Operating Report Emissions for 2004</b>	<b>Any variances from the 2004 source in preceding years.</b>
Bleaching	Pulp Prod.	MeOH	2000 special testing in the bleach plant resulted in a lb MeOH/ODUBT value which is multiplied by the actual annual tonnage.	Same 2001 - 2003.
Evaporators	Pulp Prod.	VOC	VOC is assumed to be equal to methanol emissions.	Same for 2003. No evaporators VOC estimate for 1999-2002.
Evaporators	Pulp Prod.	MeOH	1999 test data summary provided a lbMeOH/ODUBT value for the evaporator area. This value is multiplied by the actual pulp production for the year.	Same 2001 - 2003.
Waste Water	Pulp Prod.	VOC	Sum of all HAPs for which there are test data or emissions factors for waste water and are included as VOC under FAC 62.24.200 using actual pulp production or waste water flow values.	Same for 2003. No wastewater VOC estimates for 1999-2002.
Waste Water	Pulp Prod.	MeOH	Methanol is based on the annual water 9 model results, which accompanies the annual stack testing for methanol. The model calculation provides a lb MeOH/ODUBT for the waste water treatment system. This value is multiplied by the actual pulp production for the year.	Same 2002 & 2003. 2001 used the water 8 model.



**EMISSION TEST REPORT  
FOR  
SULFITE RECOVERY BOILER  
AND  
A & B SCRUBBERS WITH  
POWER BOILERS 1, 2, & 3  
AT  
RAYONIER  
FERNANDINA BEACH, FLORIDA**

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**June 2005**

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## 1.0 INTRODUCTION

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Under contract to Rayonier, Source Testing And Consulting Services, Inc. (STACS) performed a series of emission tests at Rayonier's Fernandina Beach, Florida facility. Emissions testing was performed for the Sulfite Recovery Boiler and for Power Boilers #1, #2, and #3. The purpose of the tests was to demonstrate ongoing compliance with the emissions limits for particulate matter and for visible emissions for the units.

Two venturi-wet scrubbers (A and B) control emissions from the three power boilers. Emissions from Power Boilers #1 and #2 were routed through "A" Scrubber while Power Boiler #3 was routed through "B" Scrubber during the testing. Power Boiler #1 was operated on residual (No. 6 fuel oil) oil and Power Boilers #2 and #3 were operated burning bark supplemented by fuel oil as required to maintain load. Emissions from the Recovery Boiler are controlled through good combustion practices and the use of a Katzan Wet Scrubber/Brinks Demister.

All testing followed the procedures and quality control guidelines given in EPA Method 5 (40 CFR Pt 60, Appendix A). EPA Methods 1 through 4 were used in support of EPA Method 5. EPA Method 9 was used to determine visible emissions.

Sampling was performed on June 9, 2005 for the B-Scrubber, on June 10, 2005 for A-Scrubber and on June 8, 2005 for the Recovery Boiler.

Section 2.0 of this report provides a brief process description and a diagram of the sample point locations. Section 3.0 presents the test results. Section 4.0 outlines the procedures and test methods used and Section 5.0 discusses the quality assurance/quality control measures followed during sampling and analysis. Field data sheets, laboratory data,

sample calculations, calibration data, process data, and a list of project participants are included in the Appendices to this report.

## **2.0 PROCESS DESCRIPTION AND SAMPLE POINT LOCATIONS**

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### **2.1 POWER BOILERS 1, 2 & 3 WITH SCRUBBERS A AND B**

Particulate matter emissions from Power Boilers 1, 2, and 3 are controlled by one of two venturi type scrubbers with entrained water demisters downstream of the venturi. Power Boilers 2 and 3 are furnace type boilers capable of burning bark or Number 6 fuel oil. During the test series, Power Boilers 2 and 3 were fired with bark supplemented by oil to maintain load as required. Power Boiler 1 is a furnace type boiler that burns only Number 6 fuel oil.

The maximum allowable particulate emission for Power Boiler 3 through "B" Scrubber is 50.6 lb/hr while burning Hog fuel (pine bark and wood refuse), and 16.7 lb/hr when burning oil. Boiler #1 is limited to a maximum of 16.0 lb/hr particulate matter emissions burning oil. Boiler #2 is limited to 50.6 lb/hr of particulate matter on Hog fuel. Therefore, "A" Scrubber with Power Boilers 1 & 2 in operation has a maximum combined limit of 66.6 lb/hr of particulate matter.

The FDEP permit also requires that the units be operated at 90% or greater of full load during emissions testing. Copies of the process operating data collected during testing are included in Appendix D to document load conditions.

The identical scrubber stacks are 10' in inside diameter and are sampled through two ports 90° apart around the circumference of the stack. The nearest downstream disturbance from the sampling location was the atmospheric exhaust which was located



one duct diameter away from the test ports. The nearest upstream disturbance was the top of the scrubber which was four diameters away from the ports. Using this criteria and EPA Method 1 guidelines, 12 sample points per traverse diameter were used, for a total of 24 points. A schematic diagram typical of the stack sampling location is included in Figure 2-1.

## **2.2 SULFITE RECOVERY BOILER**

The Sulfite Recovery Boiler produces steam by the combustion of spent sulfite liquor (SSL). Particulate matter emissions from the unit are controlled by venting the effluent gases through a Katzen wet scrubber followed by venting the effluent gases through a series of Brinks mist filters.

The maximum allowable particulate mass emission rate for the sulfite recovery boiler is 67.5 lb/hr. The FDEP permit also requires that the units be operated at 90% or greater of full load during emissions testing. Copies of the process operating data collected during testing are included in Appendix D to document load conditions.

Figure 2-2 presents a schematic diagram of the emissions sampling location. Based on EPA Method 1 criteria, the location requires 12 sampling points (6 on each diameter).

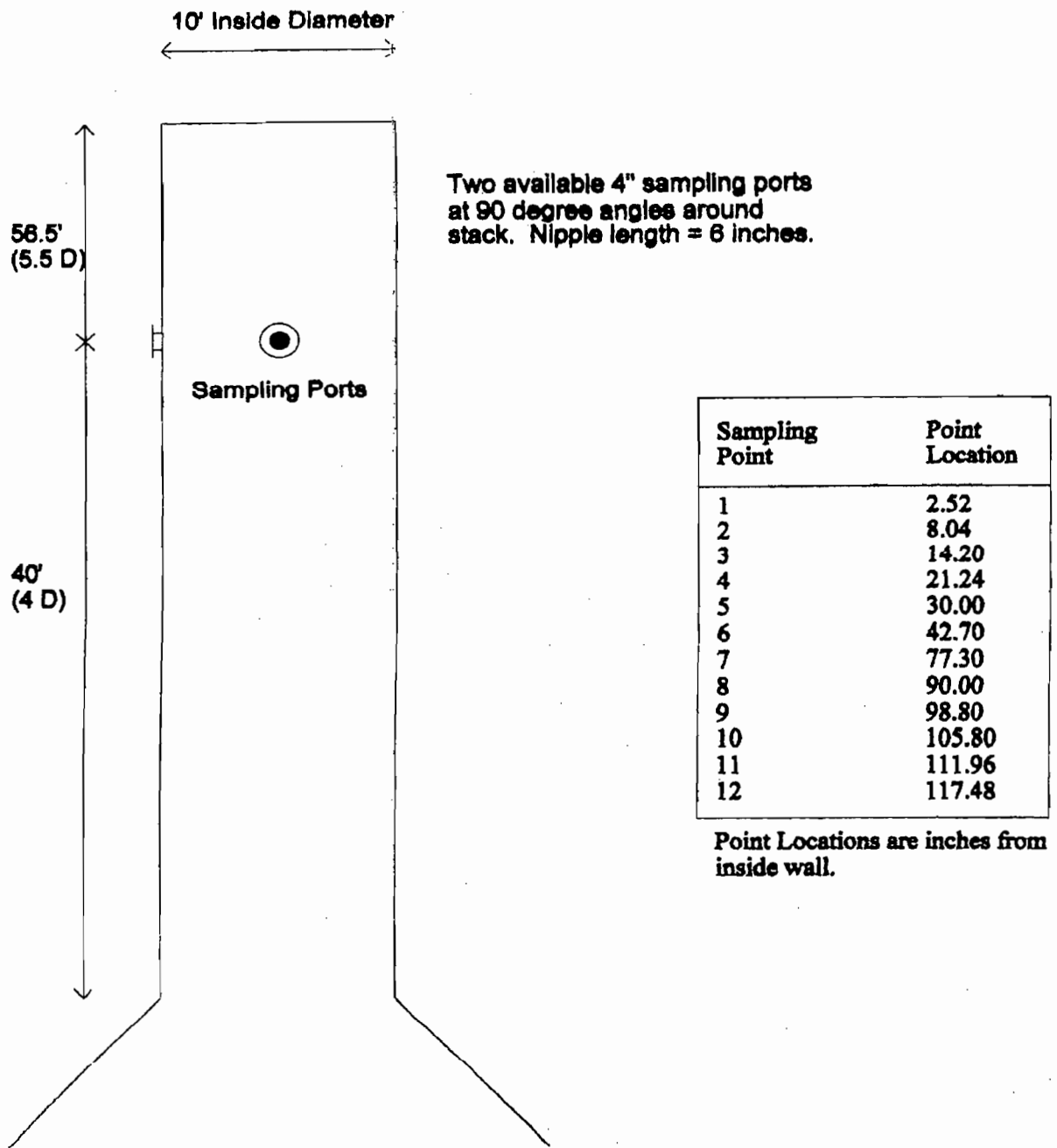
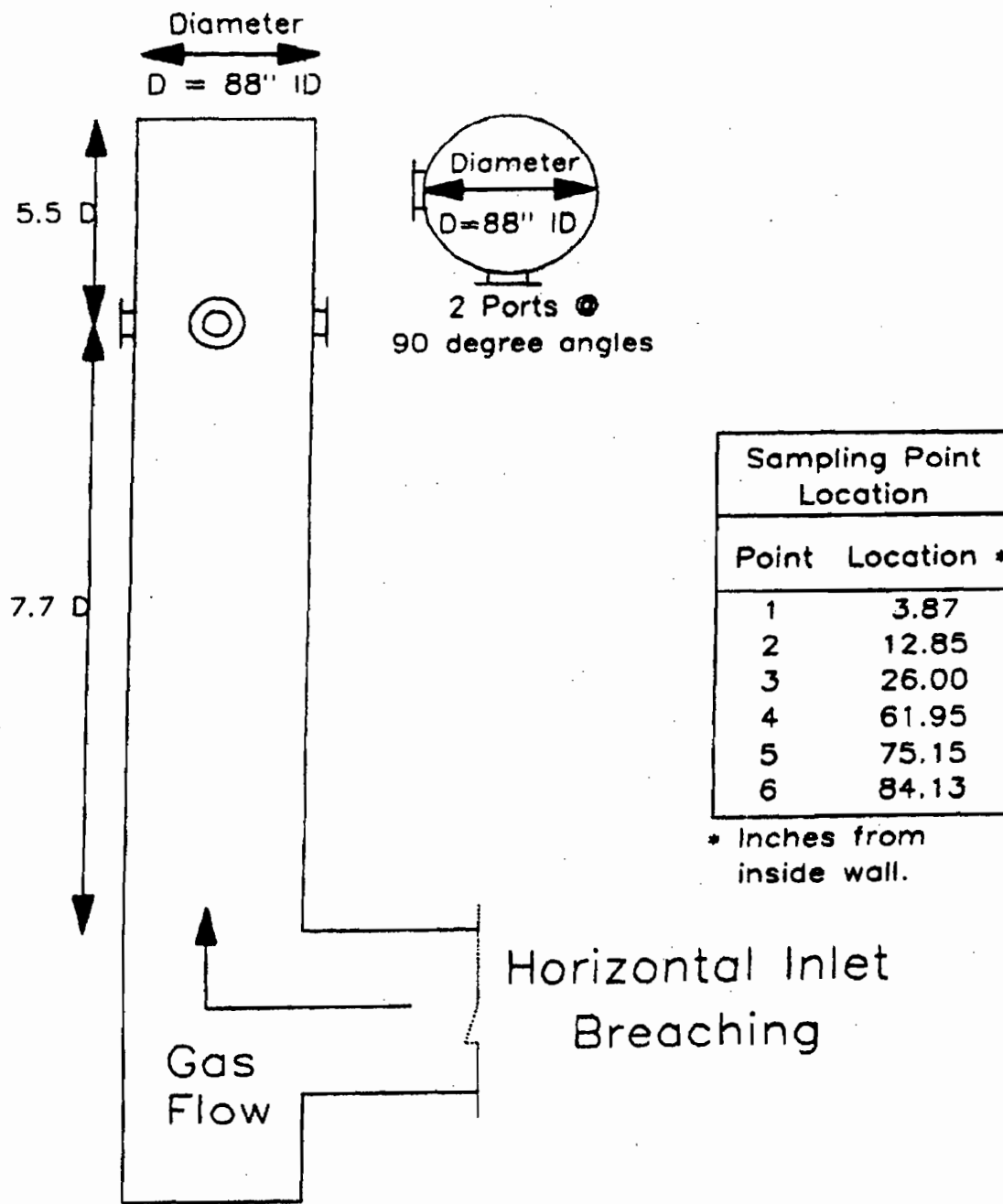


Figure 2-1. A & B Scrubber Stack Schematic Diagram



**Figure 2-2. Sulfite Recovery Boiler Stack Schematic Diagram**

### **3.0 PARTICULATE TEST RESULTS**

### 3.0 PARTICULATE TEST RESULTS

#### 3.1 POWER BOILERS 1, 2 & 3 WITH SCRUBBERS A AND B

Emissions testing for the "A" Scrubber was conducted on June 10, 2005. The tests for "B" Scrubber were conducted on June 9, 2005. The results of the EPA Method 5 particulate matter tests are given in Table 3-1 for the "A" Scrubber stack and in Table 3-2 for the "B" Scrubber stack. The highest observed six-minute average opacity for the two units are also included in the tables.

The average particulate mass emission rate from the "A" Scrubber stack with Power Boiler #1 burning residual fuel oil and Power Boiler #2 burning bark was 26.38 lb/hr during the tests with a range of 22.59 lb/hr to 31.51 lb/hr. The combined emission limit for the two units is 66.6 b/hr (50.6 lb/hr for Unit #2 and 16 lb/hr for Unit #1). The average particulate matter concentration in the gas stream for the "A" stack during the tests was .0300 grains per dry standard cubic foot (gr/dscf).

Particulate matter emissions from the "B" Scrubber stack with Power Boiler #3 burning bark averaged 26.92 lb/hr and varied from 22.18 lb/hr to 31.03 lb/hr. The emission limit for Power Boiler #3 is 50.6 lb/hr. The average particulate matter concentration was .0344 gr/dscf.

#### 3.2 SULFITE RECOVERY BOILER

Emissions testing for the Sulfite Recovery Boiler was conducted on June 8, 2005. The results of the EPA Method 5 particulate matter tests for the Sulfite Recovery Boiler are given in Table 3-3. The highest observed six-minute average opacity for the unit is also included in the table.

The average particulate mass emission rate from the recovery boiler during the tests was 21.86 lb/hr with a range of 12.37 lb/hr to 28.72 lb/hr. The average particulate matter concentration in the gas stream for the recovery boiler during the tests was 38.93 milligrams per dry standard cubic meter (mg/dscm) corrected to 8% oxygen.

Field data sheets for all sampling are included in Appendix B. Sample calculations and run summaries are given in Appendix A. Calibration and Quality Assurance data are given in Appendix C.

**Table 3-1. Summary of Emissions Testing Data - Total Solid Particulate Matter - Scrubber A  
Rayonier  
Scrubber A**

Parameter	Units	Run #	1-A	2-A	3-A AVERAGE	
		Date:	10-Jun-05	10-Jun-05	10-Jun-05	
		Start Time:	9:50	12:35	15:08	
		Stop Time:	11:23	13:37	16:09	
<b>Sampling Train &amp; Analytical Parameters:</b>						
Total Solid Particulate Matter:	g		0.0942	0.0775	0.0658	0.0792
Metered Volume:	dscf		41.894	41.145	38.765	40.601
Gas Stream Volumetric Flowrate:	dscfm		105956.0	100442.3	100608.9	102335.8
Oxygen:	%V, dry		10.8	11.7	12.1	11.5
Carbon Dioxide:	%V, dry		9.8	9.2	8.2	9.1
<b>Total Solid Particulate (TSP) Matter Emissions:</b>						
TSP Concentration:	gr/dscf		0.03470	0.02907	0.02620	0.02999
TSP Mass Emission Rate:	lb/hr		31.514	25.026	22.590	26.377
TSP Mass Emission Rate:	mg/dscm		79.40	66.51	59.94	68.61
TSP Mass Emission Rate @8% O2:	mg/dscm		101.41	93.26	87.86	94.18
Visible Emissions - Six Minute Average						9.6

**Table 3-2. Summary of Emissions Testing Data - Total Solid Particulate Matter - Scrubber B  
Rayonier  
Scrubber B**

Parameter	Units	Run #	1-B	2-B	3-B AVERAGE	
		Date:	9-Jun-05	9-Jun-05	9-Jun-05	
		Start Time:	11:08	13:00	14:51	
		Stop Time:	12:14	14:02	15:52	
<b>Sampling Train &amp; Analytical Parameters:</b>						
Total Solid Particulate Matter:	g		0.0802	0.0635	0.0924	0.0787
Metered Volume:	dscf		35.619	35.120	35.042	35.260
Gas Stream Volumetric Flowrate:	dscfm		92473.8	92719.3	88975.4	91389.5
Oxygen:	%V, dry		11.2	11.5	11.5	11.4
Carbon Dioxide:	%V, dry		8.6	8.6	8.0	8.4
<b>Total Solid Particulate (TSP) Matter Emissions:</b>						
TSP Concentration:	gr/dscf		0.03475	0.02790	0.04069	0.03445
TSP Mass Emission Rate:	lb/hr		27.542	22.176	31.034	26.917
TSP Mass Emission Rate:	mg/dscm		79.5054	63.8455	93.1086	78.8199
TSP Mass Emission Rate @8% O2:	mg/dscm		105.7340	87.6178	127.7767	107.0428
Visible Emissions - Six Minute Average						7.7



**Table 3-3. Summary of Emissions Testing Data - Total Solid Particulate Matter - Sulfite Recovery Boiler**  
**Rayonier**  
**Sulfite Recovery Boiler**

Parameter	Units	Run #	1	2	3 AVERAGE	
		Date:	8-Jun-05	8-Jun-05	8-Jun-05	
		Start Time:	9:00	11:05	12:48	
		Stop Time:	10:05	12:08	13:50	
<b>Sampling Train &amp; Analytical Parameters:</b>						
Total Solid Particulate Matter:	g		0.0438	0.1016	0.0881	0.0778
Metered Volume:	dscf		52.249	55.648	56.999	54.965
Gas Stream Volumetric Flowrate:	dscfm		111539.3	118935.2	119743.1	116739.2
Oxygen:	%V, dry		4.5	4.1	4.9	4.5
Carbon Dioxide:	%V, dry		14.5	14.8	14.2	14.5
<b>Total Solid Particulate (TSP) Matter Emissions:</b>						
TSP Concentration:	gr/dscf		0.01294	0.02818	0.02385	0.02166
TSP Mass Emission Rate:	lb/hr		12.368	28.724	24.482	21.858
TSP Mass Emission Rate:	mg/dscm		29.60	64.47	54.58	49.55
TSP Mass Emission Rate @8% O2:	mg/dscm		23.28	49.50	44.00	38.93
Visible Emissions - Highest Six Minute Average						19.6

## **4.0 FIELD AND ANALYTICAL PROCEDURES**

## 4.0 FIELD AND ANALYTICAL PROCEDURES

### 4.1 EPA METHOD 5 - PARTICULATE SAMPLING AND ANALYSIS

The sampling and analytical procedures used follow the procedures as outlined in EPA Method 5, in the Code of Federal Regulations, Chapter I, Title 40, Part 60, Appendix A, Method 5, revised as of July 1, 1991. The sampling equipment consisted of the following:

1. Sample Probe Assembly
  - a. Nozzle--Stainless steel with a sharp, tapered leading edge.
  - b. Probe--Stainless steel (S.S.) sheath with a 2-inch diameter glass insert wrapped with nichrome wire; rheostat controlled and capable of maintaining a temperature of 248 +/-25 degrees Fahrenheit (°F).
  - c. Pitot--Type "S" constructed and attached to probe according to specifications outlined in the Code of Federal Regulations, Chapter I, Title 40, Part 60, Appendix A, Method 2.
  - d. Orsat Probe--Stainless steel 1/4 inch tubing attached to pitot tube in an interference-free arrangement.
  - e. Thermocouple--Type "K" attached to the pitot tube such that the tip has no contact with metal and does not interfere with the pitot tube face openings.
2. Filter Holder--Glass with fritted glass filter support.
3. Filter Heating Assembly--Controlled heating element in aluminum module attached to end of probe; capable of maintaining 248 +/-25°F.
4. Impingers--Four impingers connected in series with glass ball/socket joint fittings and placed in an ice bath. A Greenburg-Smith impinger standard

tip configuration is used for the second impinger. The first, third, and fourth impingers are the modified Greenburg-Smith design with a 0.5 in. ID glass tube extending to about 0.5 in. from the bottom of the flask. Final gas exit temperature is measured to within  $\pm 2^{\circ}\text{F}$  with a type "K" thermocouple immersed in the gas stream.

5. Control Box--Model containing vacuum gauge, external leak-free pump, thermocouples capable of measuring temperature to within  $\pm 2^{\circ}\text{F}$ , dry gas meter with a minimum of 2 percent accuracy, valves and related equipment as required to maintain an isokinetic sampling rate, and to determine sample volume.

Prior to leaving the laboratory, glass fiber filters were numbered for identification, heated for 2 hours at 105 degrees C, desiccated for 2 hours, and pre-weighed to the nearest 0.1 mg. Silica gel (indicating type, 6-16 Mesh) was also pre-weighed to 200 grams after oven drying for 24 hours.

Upon arrival at the sampling site, the control box was leak-checked from pump to orifice at 5 to 7 inches of water.

The sample train was prepared in the following manner: 100 mL of  $\text{H}_2\text{O}$  was added to the first and second impingers. The third impinger was left empty, and a pre-weighed quantity of silica gel was added to the fourth impinger for final moisture removal. After assembling the train with the pitot tube as shown in the schematic (Figure 4-1), the system was leak-checked by plugging the inlet to the probe nozzle and pulling a vacuum of at least 15 inches of mercury (Hg). A leakage rate not in excess of 0.02 cfm is

considered acceptable. The pitot tube system was also leak-checked at 2 to 3 inches of water, and any leaks found were corrected.

The inside dimensions of each stack were measured and recorded. The number of sampling points and the location of these points on a traverse were determined by the guidelines set forth in the Code of Federal Regulations, Chapter I, Title 40, Part 60, Appendix A, Method 1. These points were then marked on the probe for easy visibility.

A preliminary traverse was conducted to determine the range of velocity head and the pressure of the stack. An approximate stack temperature was obtained during the same traverse, and an approximate moisture content was estimated based on knowledge of the emission source type and attendant characteristics and prior testing experience. From these data, the correct nozzle size and isokinetic K- factor were determined.

The probe was attached and the heater was adjusted to provide a gas temperature of approximately 250°F. The filter heating system was turned on, and crushed ice was placed around the impingers. After a suitable warm-up period, the nozzle was placed at the first traverse point with the tip pointing directly into the gas stream. The pump was started and the sampling rate was adjusted to isokinetic conditions. After the required time interval had elapsed, the probe was repositioned to the next traverse point, and isokinetic sampling was re-established. This was done for each point on the traverse until the run was completed. Readings were taken at least every 5 minutes or when significant changes in stack conditions necessitated additional adjustments in flow rate. At the conclusion of each run, the pump was turned off and the final readings were recorded. A final leak-check of the system was performed as previously described at the highest vacuum encountered during testing, and a leak-check of the pitot system was repeated.

#### **4.1.1 SAMPLE RECOVERY**

The collection train was carefully moved to a convenient sample recovery area in order to minimize the loss of collected sample or the gain of extraneous particulate matter. The volume of condensate in the first three impingers was measured and recorded on the field data sheet. The probe, nozzle, and all sample-exposed surfaces were rinsed with reagent grade acetone and put into a clean sample bottle marked "pre-filter". A brush was used to loosen any adhering particulate matter, and subsequent rinses were put into the "pre-filter" container. The filter was carefully removed from the fritted glass support and placed in its original container. The silica gel was removed from the fourth impinger and transferred to its original container. A sample of the acetone used in washing the probe was saved for a blank laboratory analysis.

#### **4.1.2 ANALYTICAL PROCEDURES**

The filter and any loose particulate matter were transferred from the sample container to a clean, tared glass weighing dish. The filter was placed in an oven at 105°C for 2 hours, desiccated for 2 hours, and then weighed. The original weight of the filter was deducted, and the weight gain was recorded to the nearest 0.1 mg.

The "pre-filter" and blank solutions were transferred to clean, tared beakers, then evaporated to dryness and desiccated to a constant weight. The blank correction was made, and the weight gain was recorded to the nearest 0.1 mg. The silica gel was weighed, and the weight gain was recorded to the nearest 0.1 gram.

#### **4.2 EPA METHOD 3--ORSAT SAMPLING AND ANALYSIS**

Carbon dioxide (CO<sub>2</sub>) and oxygen (O<sub>2</sub>) samples were collected by an integrated bag system. The Orsat sampling system consisted of a stainless steel probe, sample line from probe to a condenser, a small vacuum pump with a rotameter, and a Tedlar bag.

The Orsat sampling procedure consists of the following leak-check and sampling techniques. Prior to sampling, the bag was leak-checked at 2 to 4 inches of water. The inlet to the condenser was plugged, and a vacuum of 10 inches of Hg was pulled. The outlet of the pump was then plugged and the pump shut off. The vacuum held steady for at least 30 seconds. The sample line was then purged with stack gas and the bag was connected. Sampling was conducted at the appropriate points and for the same length of time as the pollutant sampling. At the conclusion of the run, the pump was shut off and the bag secured.

After leak-checking the Orsat gas analyzer, an average value for each gas was determined. The gas was measured until three values were obtained that fell within the specified variance of the gas tested. Data were recorded on the field data sheet, and the bag was evacuated for the next sample run.

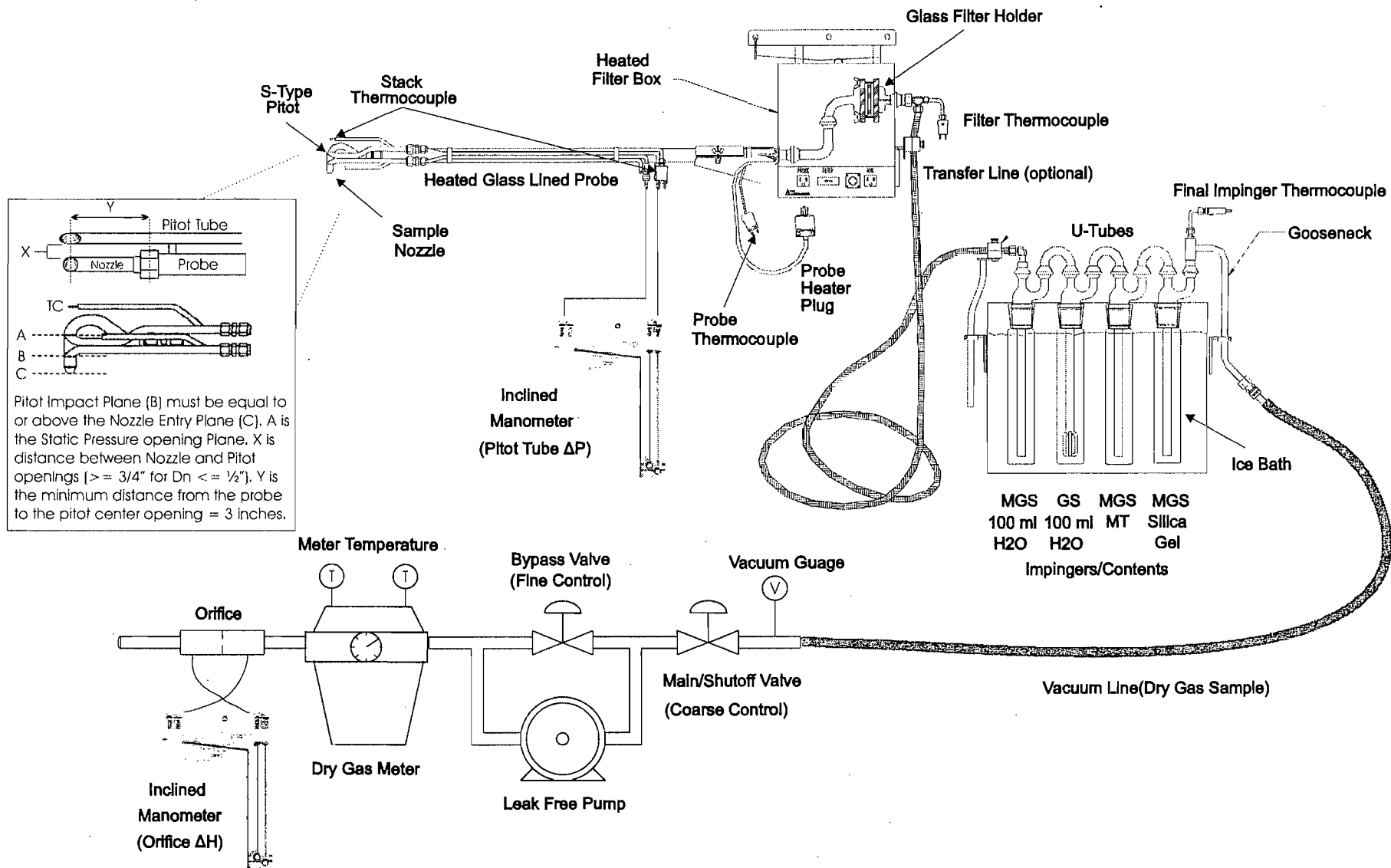


Figure 4-1. Schematic Diagram of EPA Method 5 Sampling Train



## **5.0 QUALITY ASSURANCE/QUALITY CONTROL**

## 5.0 QUALITY ASSURANCE/QUALITY CONTROL

Strict Quality Assurance/Quality Control (QA/QC) measures were observed for all sampling and analysis performed for the Rayonier test program. The STACS QA/QC program is designed to provide the highest quality data in terms of the accuracy and precision of the measurements as well as the representativeness and comparability of the results.

The STACS QA/QC program for this test series includes all of the QA/QC guidelines given in EPA Methods 1-5 (40 CFR Pt 60, Appendix A) in addition to internal QA/QC standards. Primary components of the QA/QC program are listed below:

- Equipment Calibrations - including meter boxes, thermocouples, pitot tubes and analytical balance
- Equipment Leak Checks - including pre- and post-test sample train leak checks, meter and pump leak checks, pitot leak checks and ORSAT system leak checks
- Careful monitoring and documentation of sample train critical parameters including temperatures and meter pressure.
- Preliminary measurements to aid in calculating the sampling K-factor used to determine isokinetic sampling rate.
- Maintaining an isokinetic sampling rate so that the velocity through the sampling nozzle matches the surrounding flue gas stream velocity to within +/- 10%

All sampling train leak rates were less than the maximum acceptable leak rate of 0.02 cubic feet per minute. Sample train leak checks were performed at a vacuum of at least 5" Hg greater than the highest observed vacuum observed during sampling. All sample trains met the +/- 10% criterion for isokinetic sampling. All samples were desiccated and replicate analyses were performed until agreement of 0.5 mg between weighings that were six hours apart.

**APPENDIX A**  
**EMISSION DATA & SAMPLE CALCULATIONS**

**SUMMARY OF EMISSIONS SAMPLING DATA**

Plant:	Rayonier	Location:	Scrubber A	Run #	1-A	2-A	3-A	AVERAGE
Condition:	Normal	Date:	10-Jun-05	10-Jun-05	10-Jun-05			
Unit:	Scrubber A	Method:	Method 5	Start Time:	9:50	12:35	15:08	
Parameter		Units		Stop Time:	11:23	13:37	16:09	
Sampling Time		min.			60	60	60	60
<b>AMBIENT DATA:</b>								
Ambient Temperature		deg. F		77	83	80		80.00
Location Height above Pbar reading		feet		0	0	0		0
Barometric Pressure		in. Hg		29.85	29.80	29.80		29.82
Corrected Barometric Pressure (to location)		in. Hg		29.85	29.80	29.80		29.82
<b>GAS METER DATA:</b>								
Dry Gas Meter Correction Factor (gamma)		Dimensionless		1.0153	1.0153	1.0153		1.0153
Average Meter Differential Pressure		in. H2O		1.5900	1.4700	1.4175		1.4925
Absolute Meter Pressure		in. Hg		29.97	29.91	29.90		29.93
Average Meter Temperature		degrees F		85.4	87.0	85.1		85.9
Metered Dry Sample Gas Volume		dcf		42.559	42.000	39.440		41.333
Average Sampling Rate		dscfm		0.698	0.686	0.646		0.677
Standard Metered Volume		dscf		41.894	41.145	38.765		40.601
Standard Metered Volume		dscm		1.1864	1.1652	1.0978		1.1498
<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		5.5253	5.8435	5.4304		5.5997
Vapor Phase Moisture Content at Saturation:		% Volume		18.52	19.62	18.23		18.79
Total Condensate Collected		grams H2O		220	251	222.6		231.20
Standard Volume of Water Vapor		scf		10.373	11.835	10.496		10.901
Measured Moisture Content		mole fraction		0.1985	0.2234	0.2131		0.2116
Measured Moisture Content		% Volume		19.85	22.34	21.31		21.16
Gas Stream Vapor Phase Moisture (Bs):		% Volume		18.52	19.62	18.23		18.79
<b>FIXED GAS DATA:</b>								
Oxygen Concentration, Dry Basis		% Volume		10.8	11.7	12.1		11.5
Carbon Dioxide Concentration, Dry Basis		% Volume		9.8	9.2	8.2		9.1
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		79.4	79.1	79.7		79.4
Gas Molecular Weight, Dry Basis		lb/lb-mole		30.000	29.940	29.796		29.912
Gas Molecular Weight, Wet Basis		lb/lb-mole		27.778	27.598	27.646		27.674
Fo Calculated:		Dimensionless		1.031	1.000	1.073		1.035
Excess Air:		%		106.12	127.20	135.09		122.80
Ultimate CO2		%V,d		20.28	20.90	19.48		20.22
<b>DUCT CONFIGURATION:</b>								
Duct Geometry (C = Circular, R = Rectangular)				C	C	C		
Duct Dimensions (Diameter)		inches		120	120	120		120
Effective Duct Diameter (De)		inches		120	120	120		120
Stack Cross-Sectional Area		ft2		78.54	78.54	78.54		78.54
<b>DUCT GAS CONDITIONS:</b>								
Static Pressure of Gas Stream		in. H2O		-0.150	-0.140	-0.130		-0.140
Absolute Duct Gas Pressure		in. Hg		29.839	29.790	29.790		29.806
Gas Stream Temperature		degrees F		137.58	139.75	136.92		138.08
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. H2O) <sup>0.5</sup>		0.5136	0.4932	0.4849		0.4972
Gas Stream Velocity		ft/sec		31.316	30.251	29.645		30.404
Gas Stream Velocity		ft/min		1878.93	1815.05	1778.73		1824.24
Gas Stream Velocity		meters/min		572.70	553.23	542.16		556.03
Gas Stream Velocity		mi/hr		21.353	20.627	20.214		20.731
<b>FLOWRATE/ENGLISH UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis		acfm		147570.8	142553.6	139700.8		143275.1
Standard Volumetric Flow Rate, Wet Basis		scfm		130034.4	124953.0	123036.7		126008.0
Standard Volumetric Flow Rate, Dry Basis		dscfm		105956.0	100442.3	100608.9		102335.8
Standard Volumetric Flow Rate, Wet Basis		kscfh		7802.06	7497.18	7382.20		7560.48
Standard Volumetric Flow Rate, Dry Basis		kdscfh		6357.36	6026.54	6036.53		6140.15
Total Mass Flow Rate (wet)		kpph		562.49	537.00	529.68		543.06
<b>FLOWRATE/METRIC UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis		acmm		4179.21	4037.12	3956.33		4057.55
Standard Volumetric Flow Rate, Wet Basis		scmm		3682.57	3538.67	3484.40		3568.55
Standard Volumetric Flow Rate, Dry Basis		dscmm		3000.67	2844.53	2849.24		2898.15
<b>ISOKINETIC SAMPLING DATA:</b>								
Nozzle Diameter:		inches		0.306	0.306	0.306		0.306
Area of Nozzle:		ft <sup>2</sup>		5.107E-04	5.107E-04	5.107E-04		5.107E-04
Isokinetic Sampling Rate:		%I		101.4	105.1	98.8		101.8
<b>PARTICULATE MATTER:</b>								
Particulate Matter Collected:		grams		0.0942	0.0775	0.0658		0.0792
Particulate Matter Concentration:		grams/dscm		0.07940	0.06651	0.05994		0.06861
Particulate Matter Mass Emission Rate:		grams/sec		3.971	3.153	2.846		3.323
Particulate Matter Concentration:		lb/dscf		4.96E-06	4.15E-06	3.74E-06		4.28E-06
Particulate Matter Concentration:		grains/dscf		0.03470	0.02907	0.02620		0.02999
Particulate Matter Mass Emission Rate:		lb/hr		31.514	25.026	22.590		26.377

SUMMARY OF EMISSIONS SAMPLING DATA

Plant:	Rayonier	Location:	Scrubber B	Run #	1-B	2-B	3-B	AVERAGE
Condition:	Normal	Date:	9-Jun-05	9-Jun-05	9-Jun-05			
Unit:	Scrubber B	Method:	Method 5	Start Time:	11:08	13:00	14:51	
Parameter-Sampling Time		Units		Stop Time:	12:14	14:02	15:52	
		min.			60	60	60	60
<b>AMBIENT DATA:</b>								
Ambient Temperature		deg. F		85	90	85		86.67
Location Height above Pbar reading		feet		0	0	0		0
Barometric Pressure		in. Hg		29.80	29.80	29.80		29.80
Corrected Barometric Pressure (to location)		in. Hg		29.80	29.80	29.80		29.80
<b>GAS METER DATA:</b>								
Dry Gas Meter Correction Factor (gamma)		Dimensionless		0.9872	0.9872	0.9872		0.9872
Average Meter Differential Pressure		in. H2O		1.2100	1.1625	1.1350		1.1692
Absolute Meter Pressure		in. Hg		29.89	29.89	29.88		29.89
Average Meter Temperature		degrees F		88.5	86.5	84.8		86.6
Metered Dry Sample Gas Volume		dcf		37.518	36.864	36.670		37.017
Average Sampling Rate		dscfm		0.594	0.585	0.584		0.588
Standard Metered Volume		dscf		35.619	35.120	35.042		35.260
Standard Metered Volume		dscm		1.0087	0.9946	0.9924		0.9986
<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		5.4776	4.9546	5.7193		5.3839
Vapor Phase Moisture Content at Saturation:		% Volume		18.39	16.63	19.20		18.07
Total Condensate Collected		grams H2O		217	181.7	212.1		203.60
Standard Volume of Water Vapor		scf		10.232	8.567	10.001		9.600
Measured Moisture Content		mole fraction		0.2231	0.1961	0.2220		0.2138
Measured Moisture Content		% Volume		22.31	19.61	22.20		21.38
Gas Stream Vapor Phase Moisture (Bs):		% Volume		18.39	16.63	19.20		18.07
<b>FIXED GAS DATA:</b>								
Oxygen Concentration, Dry Basis		% Volume		11.2	11.5	11.5		11.4
Carbon Dioxide Concentration, Dry Basis		% Volume		8.6	8.6	8.0		8.4
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		80.2	79.9	80.5		80.2
Gas Molecular Weight, Dry Basis		lb/lb-mole		29.824	29.836	29.740		29.800
Gas Molecular Weight, Wet Basis		lb/lb-mole		27.650	27.868	27.486		27.668
Fo Calculated:		Dimensionless		1.128	1.093	1.175		1.132
Excess Air:		%		112.13	119.67	117.73		116.51
Ultimate CO2		%V,d		18.53	19.12	17.79		18.48
<b>DUCT CONFIGURATION:</b>								
Duct Geometry (C = Circular, R = Rectangular)				C	C	C		
Duct Dimensions (Diameter)		inches		120	120	120		120
Effective Duct Diameter (De)		inches		120	120	120		120
Stack Cross-Sectional Area		ft2		78.54	78.54	78.54		78.54
<b>DUCT GAS CONDITIONS:</b>								
Static Pressure of Gas Stream		in. H2O		-0.100	-0.120	-0.100		-0.107
Absolute Duct Gas Pressure		in. Hg		29.793	29.791	29.793		29.792
Gas Stream Temperature		degrees F		137.25	133.42	138.92		136.53
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. H2O) <sup>0.5</sup>		0.4467	0.4388	0.4334		0.4396
Gas Stream Velocity		ft/sec		27.314	26.639	26.619		26.857
Gas Stream Velocity		ft/min		1638.85	1598.37	1597.12		1611.44
Gas Stream Velocity		meters/min		499.52	487.18	486.80		491.17
Gas Stream Velocity		mi/hr		18.624	18.164	18.150		18.313
<b>FLOWRATE/ENGLISH UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis		acfm		128714.6	125535.4	125437.6		126562.5
Standard Volumetric Flow Rate, Wet Basis		scfm		113306.1	111215.8	110114.0		111545.3
Standard Volumetric Flow Rate, Dry Basis		dscfm		92473.8	92719.3	88975.4		91389.5
Standard Volumetric Flow Rate, Wet Basis		kscfh		6798.36	6672.95	6606.84		6692.72
Standard Volumetric Flow Rate, Dry Basis		kdscfh		5548.43	5563.16	5338.52		5483.37
Total Mass Flow Rate (wet)		kpgh		487.87	482.63	471.31		480.60
<b>FLOWRATE/METRIC UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis		acmm		3645.20	3555.16	3552.39		3584.25
Standard Volumetric Flow Rate, Wet Basis		scmm		3208.83	3149.63	3118.43		3158.96
Standard Volumetric Flow Rate, Dry Basis		dscmm		2618.86	2625.81	2519.78		2588.15
<b>ISOKINETIC SAMPLING DATA:</b>								
Nozzle Diameter:		inches		0.306	0.306	0.306		0.306
Area of Nozzle:		ft <sup>2</sup>		5.107E-04	5.107E-04	5.107E-04		5.107E-04
Isokinetic Sampling Rate:		%I		98.8	97.1	101.0		99.0
<b>PARTICULATE MATTER:</b>								
Particulate Matter Collected:		grams		0.0802	0.0635	0.0924		0.0787
Particulate Matter Concentration:		grams/dscm		0.07951	0.06385	0.09311		0.07882
Particulate Matter Mass Emission Rate:		grams/sec		3.470	2.794	3.910		3.392
Particulate Matter Concentration:		lb/dscf		4.96E-06	3.99E-06	5.81E-06		4.92E-06
Particulate Matter Concentration:		grains/dscf		0.03475	0.02790	0.04069		0.03445
Particulate Matter Mass Emission Rate:		lb/hr		27.542	22.176	31.034		26.917

**SUMMARY OF EMISSIONS SAMPLING DATA**

Plant:	Rayonier	Location:	Sulfite Recovery Boiler	Run #	1	2	3	AVERAGE
Condition:	Normal	Date:		8-Jun-05	8-Jun-05	8-Jun-05		
Unit:	Sulfite Recovery Boiler	Method:	Method 5	Start Time:	9:00	11:05	12:48	
Parameter		Units		Stop Time:	10:05	12:08	13:50	
Sampling Time		min.			60	60	60	60
<b>AMBIENT DATA:</b>								
Ambient Temperature		deg. F		79	84	83		82.00
Location Height above Pbar reading		feet		0	0	0		0
Barometric Pressure		in. Hg		29.65	29.65	29.65		29.65
Corrected Barometric Pressure (to location)		in. Hg		29.65	29.65	29.65		29.65
<b>GAS METER DATA:</b>								
Dry Gas Meter Correction Factor (gamma)		Dimensionless		0.9872	0.9872	0.9872		0.9872
Average Meter Differential Pressure		in. H2O		2.7173	3.0427	3.1093		2.9564
Absolute Meter Pressure		in. Hg		29.85	29.87	29.88		29.87
Average Meter Temperature		degrees F		83.0	84.8	84.5		84.1
Metered Dry Sample Gas Volume		dcf		54.558	58.257	59.625		57.480
Average Sampling Rate		dscfm		0.871	0.927	0.950		0.916
Standard Metered Volume		dscf		52.249	55.648	56.999		54.965
Standard Metered Volume		dscm		1.4797	1.5760	1.6142		1.5566
<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		2.8493	2.9109	2.9316		2.8973
Vapor Phase Moisture Content at Saturation:		% Volume		9.62	9.83	9.90		9.78
Total Condensate Collected		grams H2O		138.1	121.3	133.7		131.03
Standard Volume of Water Vapor		scf		6.511	5.719	6.304		6.178
Measured Moisture Content		mole fraction		0.1108	0.0932	0.0996		0.1012
Measured Moisture Content		% Volume		11.08	9.32	9.96		10.12
Gas Stream Vapor Phase Moisture (Bs):		% Volume		9.62	9.32	9.90		9.61
<b>FIXED GAS DATA:</b>								
Oxygen Concentration, Dry Basis		% Volume		4.5	4.1	4.9		4.5
Carbon Dioxide Concentration, Dry Basis		% Volume		14.5	14.8	14.2		14.5
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		81.0	81.1	80.9		81.0
Gas Molecular Weight, Dry Basis		lb/lb-mole		30.500	30.532	30.468		30.500
Gas Molecular Weight, Wet Basis		lb/lb-mole		29.297	29.364	29.234		29.298
Fo Calculated:		Dimensionless		1.131	1.135	1.127		1.131
Excess Air:		%		26.63	23.66	29.74		26.68
Ultimate CO2		%V,d		18.48	18.41	18.55		18.48
<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		ft2		42.24	42.24	42.24		42.24
<b>DUCT GAS CONDITIONS:</b>								
Static Pressure of Gas Stream		in. H2O		-0.480	-0.700	-0.460		-0.547
Absolute Duct Gas Pressure		in. Hg		29.615	29.599	29.616		29.610
Gas Stream Temperature		degrees F		113.25	114.00	114.25		113.83
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. H2O) <sup>0.5</sup>		0.9151	0.9746	0.9852		0.9583
Gas Stream Velocity		ft/sec		53.417	56.875	57.620		55.971
Gas Stream Velocity		ft/min		3205.04	3412.51	3457.22		3358.26
Gas Stream Velocity		meters/min		976.90	1040.13	1053.76		1023.60
Gas Stream Velocity		mi/hr		36.423	38.781	39.289		38.164
<b>FLOWRATE/ENGLISH UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis		acfm		135371.2	144134.2	146022.4		141842.6
Standard Volumetric Flow Rate, Wet Basis		scfm		123413.3	131158.9	132898.4		129156.9
Standard Volumetric Flow Rate, Dry Basis		dscfm		111539.3	118935.2	119743.1		116739.2
Standard Volumetric Flow Rate, Wet Basis		kscfh		7404.80	7869.53	7973.90		7749.41
Standard Volumetric Flow Rate, Dry Basis		kdsctf		6692.36	7136.11	7184.59		7004.35
Total Mass Flow Rate (wet)		kpph		563.04	599.74	605.00		589.26
<b>FLOWRATE/METRIC UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis		acmm		3833.71	4081.88	4135.35		4016.98
Standard Volumetric Flow Rate, Wet Basis		scmm		3495.07	3714.42	3763.68		3657.72
Standard Volumetric Flow Rate, Dry Basis		dscmm		3158.79	3368.24	3391.13		3306.05
<b>ISOKINETIC SAMPLING DATA:</b>								
Nozzle Diameter:		inches		0.25	0.25	0.25		0.25
Area of Nozzle:		ft^2		3.409E-04	3.409E-04	3.409E-04		3.409E-04
Isokinetic Sampling Rate:		%I		96.8	96.7	98.4		97.3
<b>PARTICULATE MATTER:</b>								
Particulate Matter Collected:		grams		0.0438	0.1016	0.0881		0.0778
Particulate Matter Concentration:		grams/dscm		0.02960	0.06447	0.05458		0.04955
Particulate Matter Mass Emission Rate:		grams/sec		1.558	3.619	3.085		2.754
Particulate Matter Concentration:		lb/dscf		1.85E-06	4.03E-06	3.41E-06		3.09E-06
Particulate Matter Concentration:		grains/dscf		0.01294	0.02818	0.02385		0.02166
Particulate Matter Mass Emission Rate:		lb/hr		12.368	28.724	24.482		21.858

Rayonier                      Sulfite Recovery Boiler                      Normal                      Unit:                      Sulfite Recovery Boiler

MOISTURE CONTENT DETERMINATION  
EPA METHOD 4 CALCULATIONS

Parameter	Definition	Units
Pm	- Absolute Meter Pressure	in. Hg
Po	- Average Meter Differential Pressure	in. H2O
Ps	- Absolute Stack Gas Pressure	in. Hg
Pstd	- Absolute Standard Barometric Pressure (29.92)	in. Hg
Pb	- Absolute Barometric Pressure	in. Hg
K	- Standard Volume H2O Vapor/Unit Weight Liquid Constant = 0.04715 cu.ft/g	ft3/g
Tm	- Average Meter Temperature	degrees R
Tstd	- Absolute Standard Temperature (528_R)	degrees R
DGMC	- Dry Gas Meter Correction Factor (gamma)	Dimensionless
Vlcg	- Total Condensate Collected	grams H2O
Vm	- Metered Dry Sample Gas Volume	dscf
Vmstd	- Metered Volume at Standard Conditions(528_R, 1atm)	dscf
Vwstd	- Volume of Water Vapor Collected, at Standard Conditions (528_R, 1atm)	scf
W(sat)	- Vapor Pressure of H2O at Stack Temperature	in. Hg
Bws	- Moisture Content	mole fraction
Bwd	- Moisture Content	% Volume

TEST DATA RUN #                      1

Pb =	29.65	Tm =	543
Vm =	54.558	Po =	2.717333
Vlcg =	138.1	DGMC =	0.9872
W(sat) =	2.849324	Ps =	29.61471

MEASURED MOISTURE CALCULATIONS

Pm	=	Pb + (Po/13.6)	=	29.65 + (2.72/13.6)	=	29.850 in. Hg
Vmstd	=	$\frac{(Vm)(DGMC)(Pm)(Tstd)}{(Pstd)(Tm)}$	=	$\frac{54.558 \cdot 0.9872 \cdot 29.85 \cdot 528}{29.92 \cdot 543.0}$	=	52.249 ft3
Vwstd	=	(K)(Vlcg)	=	(0.04715)(138.1)	=	6.511 ft3
Bws	=	$\frac{Vwstd}{(Vwstd)+(Vmstd)}$	=	$\frac{6.511}{(6.511+52.249)}$	=	0.1108 mol frac
Bwd	=	(Bws)*100 %	=	0.1108*100 %	=	11.08 % V

SATURATED MOISTURE CALCULATIONS

B(sat)	=	W(sat)/Ps	=	2.85/29.61	=	0.096213 mol frac
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VAPOR PHASE MOISTURE

Bws	=	0.096213	Lower of Measured or Saturated Moisture	
Bwd	=	(Bws)*100 %	=	9.62%



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Rayonier                      Sulfite Recovery Boiler                      Normal                      Unit:                      Sulfite Recovery Boiler

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MOLECULAR WEIGHT DETERMINATION  
EPA METHOD 3 CALCULATIONS

Parameter	Definition	Units
Md	- Sample Gas Molecular Weight, Dry Basis	lb/lb-mole
Ms	- Sample Gas Molecular Weight, Wet Basis	lb/lb-mole
Bws	- Moisture Content	mole fraction
%CO2	- Carbon Dioxide Concentration, Dry Basis	% Volume
%CO	- Carbon Monoxide Concentration, Dry Basis	% Volume
%O2	- Oxygen Concentration, Dry Basis	% Volume
%N2	- Nitrogen Concentration, Dry Basis (gas balance)	% Volume
0.32	- Molecular Weight of Oxygen (O2), divided by 100%	lb/lb-mole
0.28	- Molecular Weight of Carbon Monoxide, divided by 100%	lb/lb-mole
0.28	- Molecular Weight of Nitrogen (N2), divided by 100%	lb/lb-mole
0.44	- Molecular Weight of Carbon Dioxide, divided by 100%	lb/lb-mole
18.0	- Molecular Weight of Water	lb/lb-mole

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TEST DATA RUN #                      1

Bws =                      0.0962                      %CO =                      0.00  
%N2 =                      81.00                      %CO2 =                      14.50  
%O2 =                      4.50

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$$\begin{aligned} \text{Md} &= (0.44)(\%CO_2) + (0.32)(\%O_2) + (0.28)(\%N_2 + \%CO) \\ &= (0.44)*14.50 + (0.32)*4.50 + (0.28)*(81.00 + 0.00) \\ &= 30.500 \text{ lb/lb-mol} \end{aligned}$$

$$\begin{aligned} \text{Ms} &= (\text{Md})(1 - \text{Bws}) + (18.0)(\text{Bws}) \\ &= 30.500*(1 - 0.0962) + 18.0*0.0962 \\ &= 29.297 \text{ lb/lb-mol} \end{aligned}$$

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Rayonier                      Sulfite Recovery Boiler                      Normal                      Unit:                      Sulfite Recovery Boiler

VELOCITY AND VOLUMETRIC FLOWRATE DETERMINATION  
EPA METHOD 2 CALCULATIONS

Parameter	Definition	Units
Cp	- Pitot Tube Coefficient	Dimensionless
Vs	- Gas Stream Velocity	ft/sec
Qsd	- Volumetric Flow Rate at Standard Conditions, Dry Basis	dscfm
Qact	- Actual Volumetric Flow Rate, Wet Basis	acfm
Bws	- Moisture Content	mole fraction
Dp	- Avg. Sq. Root of Velocity Head	(in. H2O)^0.5
Pb	- Absolute Barometric Pressure	in. Hg
Kp	- Constant = 89.49 (ft)(lb/lb-mol)(in.Hg^0.5)/(s)(R)(in.H2O)	
Ts	- Absolute Gas Stream Temperature	degrees R
Ms	- Sample Gas Molecular Weight, Wet Basis	lb/lb-mole
Sp	- Static Pressure of Gas Stream	in. H2O
528	- Absolute Standard Temperature	degrees R
CSA	- Stack Cross-Sectional Area	ft <sup>2</sup>
Ps	- Absolute Stack Gas Pressure	in. Hg
60	- Conversion Factor	sec/min.
Pi	- Constant Ratio ~ 3.1416	Dimensionless
D	- Duct Diameter	inches

TEST DATA RUN #                      1

Ms =	29.297	Cp =	0.84
Bws =	0.0962	Pb =	29.65
Sp =	-0.48	Ts =	573.3
D =	88.00	Dp =	0.9151

Circular Duct

$$\begin{aligned}
 Ps &= Pb + (Sp/13.6) = 29.65 + (-0.48/13.6) = 29.61 \text{ in.Hg} \\
 Vs &= (85.49)(Cp)(Dp)*[(Ts)/(Ms*Ps)]^{0.5} \\
 &= 85.49*0.84*0.9151*[573.3/(29.297*29.61)]^{0.5} \\
 &= 53.417 \text{ ft/s} \qquad \qquad \qquad 53.417 \text{ ft/s} \\
 CSA &= (Pi)[(D)^2]/[(4)(144)] = 3.1416*(88.00^0.5)/(4*144)= 42.237 \text{ ft}^2 \qquad \qquad 42.237 \\
 Qact &= (Vs)*CSA*60 = 53.417*42.237*60 = 135371.2 \text{ acfm} \\
 Qsd &= \frac{(Qact)(1-Bws)(528)(Ps)}{(Ts)(29.92)} = \frac{135,371.2*(1 - 0.0962)*528*29.61}{573.3*29.92} \\
 &= 111539.3 \text{ dscfm} \qquad \qquad \qquad 111539.3 \text{ dscfm}
 \end{aligned}$$

Rayonier                      Sulfite Recovery Boiler                      Normal                      Unit:                      Sulfite Recovery Boiler

ISOKINETIC SAMPLING RATE  
EPA METHOD 5 CALCULATIONS

Parameter	Definition	Units
K4	- Constant = 0.09450	
Ts	- Average Stack Temperature	degrees R
Vmstd	- Metered Volume at Standard Conditions(528_R, 1atm)	dscf
Ps	- Absolute Stack Gas Pressure	in. Hg
Vs	- Gas Stream Velocity	ft/sec
Bws	- Moisture Content	mole fraction
t	- Sampling Time Duration	minutes
Dn	- Sample Nozzle Diameter	inches
An	- Area of Nozzle	ft2
%I	- Percent of Isokinetic Sampling	%

TEST DATA RUN #                      1

Ts =	573.25	Vs =	53.41735
Vmstd =	52.24895	Bws =	0.096213
Ps =	29.61471	Dn =	0.25
t =	60		

$$\begin{aligned}
 An &= (Pi)[(Dn)^2]/[(4)(144)] \\
 &= 3.1416*(0.250^2)/(4*144) \\
 &= 3.41E-04 \text{ ft}^2 \qquad \qquad \qquad 3.41E-04 \text{ ft}^2
 \end{aligned}$$

$$\begin{aligned}
 \%I &= \frac{K4(Ts)(Vmstd)}{(Ps)(Vs)(An)(t)(1-Bws)} \\
 &= \frac{0.09450*573.3*52.249}{29.61*53.42*0.0003409*60.0(1 - 0.096)} \\
 &= 96.79 \% \text{ Isokinetic} \qquad \qquad \qquad 96.79189 \%
 \end{aligned}$$

Rayonier                      Sulfite Recovery Boiler                      Normal                      Unit:                      Sulfite Recovery Boiler

PARTICULATE MATTER EMISSIONS  
EPA METHOD 5 CALCULATIONS

Parameter	Definition	Units
Mn	- Total Mass of Particulate Matter Collected	grams
Vmstd	- Metered Volume at Standard Conditions(528_R, 1atm)	dscf
Qsd	- Volumetric Flow Rate at Standard Conditions,Dry Basis	dscfm
Cs	- Concentration of Particulate Matter in Gas	gr/dscf
ER	- Particulate Matter Emission Rate	lb/hr
15.43	- Conversion Factor (grains/gram)	gr/g
7000	- Conversion Factor (grains/lb)	gr/lb
60	- Conversion Factor (minutes/hour)	min/hr

TEST DATA RUN #                      1

Mn =                      0.0438  
Vmstd =                      52.24895  
Qsd =                      111539.3

$$Cs = \frac{(Mn) \cdot 15.43}{(Vmstd)} = \frac{0.04380 \cdot 15.43}{52.249} = 0.01294 \text{ gr/dscf}$$

$$ER = (Cs)(Qsd)(60)/7000 = 0.0129 \cdot 111,539.3 \cdot 60 / 7000 = 12.36837 \text{ lb/hr}$$

Fd	- Dry F Factor (gas volume to heat input ratio)	dscf/MMBtu
%O2	- Oxygen Concentration, Dry Basis	% Volume
E	- Particulate Matter Emission Rate	lb/MMBtu

$$E = \frac{(Cs)(Fd)(20.9)}{(7000)(20.9 - \%O2)} = \frac{\#N/A}{7000 \cdot (20.9 - 4.5)} = \#N/A \text{ lb/MMBtu}$$

**APPENDIX B**  
**FIELD DATA SHEETS**

Rayonier June 2005

R=Sublite Recovery Boiler

Source Testing and Consulting Services Inc.  
Gravimetric Analysis Data Sheet

A=A Scrubber

B=B Scrubber

Date				6/14/05	6/15/05	6/16/05				
Time				0930	0830	0900				
Beaker/ Filter#	Sample ID	Volume	Tare (g)	Final Weights(g)						
				1st wt.	2nd wt.	3rd wt.	4th wt.	Final wt.	Net wt.	
88	R-1-A	125	61.5988	6052	6052			61.6052	.0064	.0438
451	R-1-F		4124	4500	4498			4498	.0278	
5-4	R-2-A	100	61.7115	4681	4679			4679	.0564	.1016
457	R-2-F		4221	4681	4683			4683	.0452	
48	R-3-A	110	61.4222	4616	4608	4606		61.4606	.0284	.0881
488	R-3-F		4272	4868	4869			4869	.0597	
71	B-1-A	120	69.2085	2470	2461	2462		69.2462	.0377	.0802
489	B-1-F		4191	4617	4616			4616	.0425	
25	B-2-A	130	61.2346	2630	2639	2638		61.2638	.0292	.0635
485	B-2-F		4275	4618	4618			4618	.0343	
404	R-3-A	115	51.0655	1158	1158			51.1158	.0503	.0924
486	R-3-F		4236	4656	4657			4657	.0421	
10	A-1-A	130	60.9002	9465	9465			60.9465	.0463	.0942
481	A-1-F		4269	4750	4748			4748	.0479	
16	A-2-A	120	62.3521	3747	3740	3741		62.3741	.0220	.0775
482	A-2-F		4308	4862	4863			4863	.0555	
68	A-3-A	105	68.4369	4853	4853			68.4853	.0289	.0658
483	A-3-F		4228	4595	4597			4597	.0369	
102	Acc BIK	150	60.0434	0434	0434			60.0434		
492	Filter BIK		4269	4268	4269			4269		

Calibration					
0.1g wt.		1000	1000	1000	
0.5g wt.		5000	5000	5000	
1g wt.		10000	10000	10000	
50g wt.		49.9999	50.0000	50.0001	
100g wt.		100.0000	100.0000	99.9999	

**BEST AVAILABLE COPY**

Facility:		Meter #:		Baro. Press:		Page #:					
Unit:		OH#:		Ambient Temp:		Pitot LC:					
Location:		DGM Factor:		Nozzle Dia:							
Test Type:		Pitot #:		Static P:							
Run #:		Pitot Coef:		Stack Dimensions:							
Condition:		K-Factor:		Stack Height:							
Operator(s):		Filter#:		Init. Leak Check:							
Date:				Final Leak Check:							
Traverse Point Number	Time	Gas Meter Reading Vm(R3)	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	0950	32.771	.31	1.86	134	246	251	63	80	80	7
2	955	35.8	.30	1.8	134	248	252	61	83	80	7
3	957.5	37.3	.27	1.6	135	247	253	60	84	81	7
4	1000	38.8	.25	1.5	135	249	250	60	84	81	7
5	1002.5	40.3	.23	1.4	134	251	247	60	85	81	6
6	1005	41.9	.26	1.5	135	256	248	60	85	82	6
7	1007.5	44.0	.27	1.6	136	254	248	60	85	82	6
8	1010	47.0	.28	1.7	136	254	248	61	85	82	6
9	1012.5	48.6	.27	1.6	137	251	250	61	85	82	6
10	1015	50.3	.28	1.7	137	252	252	61	86	82	7
11	1017.5	52.1	.24	1.4	137	253	251	61	86	82	6
12	1020	53.527	.23	1.4	136	251	250	61	86	82	6
		53.527									
B 1	1055:30	55.527	.31	1.86	137	252	251	63	87	81	7
2	58	57.25	.30	1.8	137	250	251	64	87	83	7
3			.3	1.2	140	252	251	64	89	84	7
4	03	56.61	.31	1.86	141	250	250	64	90	84	7
5			.31	1.86	141	250	253	64	90	84	7
6	08	64.88	.28	1.7	140	253	250	64	90	87	7
7			.28	1.7	140	250	250	64	90	87	7
8	13	68.59	.28	1.4	140	251	252	64	91	88	7
9			.22	1.4	140	251	252	64	91	88	7
10	18	72.06	.20	1.2	141	250	251	66	90	88	7
11			.2	1.2	140	250	250	66	90	88	7
12	11 23	75.33	.2	1.2	139	250	250	66	91	88	7
		42.559	5152			127.5			85.4		
				1585							
		41.8799					Pass = 1983				
Avg/Tot:											
Impinger	1	2	3	4	5	Total Traverse Point %'s					
Final	360	110		291.4		6 Point (4.4) (14.6) (29.6) (70.4) (85.4) (95.6)					
Initial	100	100		291.4		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					220	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	10.8										
CO2	9.8										

Q = 105,088  
103.6% I

RZ

STACK MONITORING DATA SHEET

Facility:		Seabrook A		Meter #:	21	Baro. Press:	28.8	Page #:	1			
Unit:		Rymon		DH@:	1.7295	Ambient Temp:	83	Pilot LC:	✓			
Location:		outlet		DGM Factor:	1.0153	Nozzle Dia:	.306					
Test Type:		45		Pitot #:		Static P:	-.14					
Run #:		2		Pitot Coef:	.84	Stack Dimensions:	17.0"					
Condition:						Stack Height:	100'					
Operator(s):		61/E26		K-factor:	6.0	Init. Leak Check:	.013 cfm@14"	*Hg				
Date:		6/10/05		Filter#:		Final Leak Check:	.010 cfm@15"	*Hg				
Traverse Point Number	Time	Gas Meter Reading Vm(R3)	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)		
1	12:55	87.99	.30	1.2	140	255	270	60	85	84	5	
2	40	79.35	.30	1.3	141	256	268	59	86	84	5	
3		81.81	.28	1.7	140	255	270	58	87	84	5	
4	45	83.10	.28	1.7	140	255	270	58	87	84	5	
5		84.41	.28	1.7	141	256	275	55	89	84	5	
6	50	86.82	.28	1.7	140	258	275	55	89	84	5	
7		88.21	.25	1.5	139	254	274	55	90	85	5	
8	55	90.40	.24	1.4	140	258	274	55	90	85	5	
9		91.96	.21	1.3	140	260	273	55	91	85	5	
10	13:00	93.68	.21	1.3	140	261	273	56	91	85	4	
11		94.88	.20	1.2	139	260	274	57	91	85	4	
12	13:05	96.85	.20	1.2	139	260	274	57	91	85	4	
		12:07	46.85									
B1		91.66	.2	1.2	138	260	270	59	89	85	5	
2	12	99.85	.2	1.2	138	260	271	60	90	85	5	
3		101.34	.18	1.1	140	260	271	60	90	85	5	
4	13:17	103.05	.18	1.1	140	260	271	61	90	85	5	
5		104.81	.26	1.3	139	261	271	61	90	85	5	
6	22	106.31	.20	1.3	139	261	273	60	90	85	5	
7		108.4	.30	1.8	140	261	273	61	91	85	4	
8	13:27	110.19	.29	1.7	140	260	274	60	90	84	4	
9		112.3	.3	1.8	140	260	275	60	91	83	4	
10	13:32	114.08	.25	1.5	140	260	275	61	90	83	4	
11		116.10	.25	1.5	141	261	274	61	90	84	4	
12	13:37	117.59	.25	1.5	140	261	274	61	90	85	5	
		42.000			139.7					87		
				1.471								
		41.1974	.4928			1100 = .2229						
Avg/Tot												
Impinger					1	2	3	4	5	Total Traverse Point %s		
Final					320	120	MT	240.3	6 Point (4.4) (12.6) (29.6) (70.4) (85.4) (95.6)			
Initial					100	100	MT	229.3	12 Point (2.1) (6.7) (11.8) (17.7) (25.0) (35.6) (64.4) (75.0) (82.3) (88.2) (93.3) (97.6)			
Total								251	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					11.7							
CO2					9.2							

Q = 96,730  
110.7% I



Facility:	Rayonia	Meter #:	A-1	Baro. Press:	29.8	Page #:	1
Unit:	Scrubber A	OH#:	1.7095	Ambient Temp:	80	Pilot LC:	✓
Location:	outlet	DGM Factor:	1.0153	Nozzle Dia:	.306		
Test Type:	MS	Pitot #:		Static P:	-1.3		
Run #:	3	Pitot Coef:	.84	Stack Dimensions:	12.0'		
Condition:				Stack Height:	100'		
Operator(s):	67	K-Factor:	60.55	Init. Leak Check:	.011 cfm@14	"Hg	
Date:	6/10/05	Filter#:		Final Leak Check:	.009 cfm@13	"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)	
R1	1508	17.76	.22	1.2	139	289	270	60	80	84	3
2	15	19.10	.22	1.2	140	289	270	57	80	84	3
3		20.70	.22	1.2	137	281	271	58	88	84	3
4	18	22.31	.22	1.2	136	260	271	58	88	84	4
5		23.90	.22	1.2	137	261	271	58	88	84	4
6	23	25.31	.25	1.4	137	261	271	59	89	84	4
7		27.150	.26	1.43	138	261	271	59	90	84	4
8	28	28.71	.27	1.5	138	260	270	59	90	84	4
9	28	30.69	.24	1.43	137	264	271	59	90	84	4
10	33	32.81	.30	1.65	136	261	273	58	91	84	4
11		34.40	.28	1.4	136	261	273	58	91	84	4
12	38	36.77	.29	1.4	136	261	270	58	90	84	4
13	38	37.89	.24	1.1	136	265	270	60	90	84	4
14	39	37.84									
A1		39.36	.22	1.2	136	261	270	61	90	84	4
2	44	41.87	.22	1.2	137	260	271	61	90	84	4
3		43.96	.2	1.1	138	260	270	61	90	84	4
4	49	44.10	.32	1.65/1.1	137	261	271	60	90	84	4
5		45.10	.3	1.65	136	261	270	60	90	84	4
6	54	47.84	.22	1.05	136	261	270	60	90	84	4
7		49.61	.22	1.2	136	261	271	61	90	84	4
8	59	51.34	.22	1.2	136	261	272	61	90	84	4
9		52.93	.22	1.2	136	262	272	61	90	84	4
10	04	54.70	.20	1.1	137	263	272	61	90	84	4
11		56.01	.20	1.1	137	263	271	62	90	84	4
12	16:09	57.20	.20	1.1	138	263	270	62	90	84	4
		39.44		1.3	136.9						
			.484								
		28.677									

Dues = 2132

Avg/Tot.											
Impinger	1	2	3	4	Total Traverse Point %'s						
Final	290	120	MT	204.4	6 Point (4.4) (14.8) (29.8) (70.4) (85.4) (95.6)						
Initial	120	110	MT	191.3	(12 Point) (2.1)(6.7)(11.8)(17.7)(25.0)(35.8)(44.4)(75.0)(82.3)(88.2)(93.9)(97.9)						
Total				222.6	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	8.2										
CO2	12.1										

Q = 96, 98 3  
103.6 % I

STACS ISOKINETIC SAMPLING FIELD DATA SHEET

Facility:	Rayonier	Meter #:	A-7	Baro. Press:	29.8	Page #:	1
Unit:	scrubber B	DH@:	1.7103	Ambient Temp:	85	Pitot LC:	<input checked="" type="checkbox"/>
Location:	stack	DGM Factor:	0.9872	Nozzle Dia:	.706		
Test Type:	MS	Pitot #:		Static P:	-1		
Run #:	1	Pitot Coef:	.84	Stack Dimensions:	10'		
Condition:				Stack Height:	~150'		
Operator(s):	JBP	K-Factor:	6.0	Init. Leak Check:	0.002 cfm @ 15" Hg		
Date:	6-9-05	Filter#:		Final Leak Check:	0.005 cfm @ 12" Hg		

Traverse Point Number	Time	Gas Meter Reading Vm(ft3)	Velocity Head (H2O)	Orifice Press (H2O)	Stack Temp (F)	Impinger Temp (F)	Dry Gas Meter Temp		Vacuum (Hg)	Angle Filter	Probe
							Inlet (F)	Outlet (F)			
A1	1100.5	27.187	.24	1.44	136	67	88		4	244	246
2	1113	30.6	.24	1.44	136	65	88		4	245	247
3	1115.5	32.1	.23	1.38	136	62	87		4	248	248
4	1118	33.7	.23	1.38	136	62	86		4	249	249
5	1120.5	35.3	.22	1.32	135	62	88		4	253	252
6	1123	36.9	.22	1.32	135	62	88		4	253	253
7	1125.5	38.7	.20	1.2	134	62	89		4	254	255
8	1128	40.5	.18	1.1	134	62	89		4	256	255
9	1130.5	42.0	.17	1.0	142	61	89		3	254	249
10	1133	43.3	.15	.9	142	60	89		3	253	248
11	1135.5	44.6	.14	.84	132	60	89		3	247	247
12	1138	45.824	.14	.84	132	60	89		3	243	244
	1144	45.882									
B1	1146.5	48.4	.21	1.3	138	64	88		4	247	247
2	1149	49.0	.21	1.3	138	61	88		4	247	247
3	1151.5	50.5	.21	1.3	140	60	89		4	246	246
4	1154	52.1	.21	1.3	140	60	89		4	245	246
5	1156.5	53.7	.26	1.7	137	60	88		6	245	245
6	1159	55.5	.28	1.7	135	60	88		6	246	244
7	1201.5	57.6	.24	1.4	138	61	89		5	247	247
8	1204	59.8	.24	1.4	138	61	89		5	248	248
9	1206.5	61.3	.17	1.0	139	61	89		5	250	250
10	1209	62.9	.17	1.0	141	62	89		5	251	252
11	1211.5	63.8	.15	.90	140	62	89		3	250	250
12	1214	64.763	.13	.78	140	62	89		3	250	251

Nozzle Calibration:

Avg/Tot										
Impinger	1	2	3	4	5	Total: Traverse Point %'s				
Final	295	100		229		6 Point (4.4) (14.6) (29.6) (70.4) (85.4) (95.6)				
Initial	100	100		217		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	195	0		12	207	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/GEN:	1	2	3	4						
O2	11.2									
CO2	8.6									

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Facility:	RAYONIER	Meter #:	A7	Baro. Press:	29.80	Page #:	1
Unit:	SCRUBBER B	DH@:	1.7103	Ambient Temp:	90	Pilot LC:	L
Location:	Stack	DGM Factor:	.9872	Nozzle Dia:	1.306		
Test Type:	MS	Pilot #:		Static P:	-12		
Run #:	2	Pilot Coef:	.84	Stack Dimensions:	10'		
Condition:				Stack Height:	175'		
Operator(s):	JBP	K-Factor:	6.0	Init. Leak Check:	0.002 cfm @ 15 "Hg		
Date:	6-9-05	Filter#:		Final Leak Check:	2.00 cfm @ 10 "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)	
1	1300	65.946									
2	1302.5	67.6	.20	1.2	136	247	251	67	85		3
3	1305	69.2	.22	1.3	136	246	256	60	85		3
4	1307.5	70.8	.22	1.3	137	247	259	59	85		3
5	1310	72.3	.22	1.3	137	248	259	59	86		3
6	1312.5	73.8	.21	1.3	134	249	258	59	86		3
7	1315	75.3	.21	1.3	130	250	259	59	86		3
8	1317.5	76.8	.20	1.2	130	250	258	60	86		3
9	1320	78.3	.19	1.2	129	251	256	60	86		3
10	1322.5	79.7	.19	1.2	131	249	257	60	86		3
11	1325	81.5	.18	1.1	133	256	259	61	86		3
12	1327.5	82.0	.17	1.1	133	248	258	61	86		3
1	1330	84.414	.18	1.1	134	248	257	61	86		3
2	1332										
3	1334.5	85.9	.18	1.1	135	259	261	64	87		3
4	1337	87.4	.18	1.1	135	258	260	61	87		3
5	1339.5	88.8	.21	1.3	135	256	257	61	87		3
6	1342	90.5	.22	1.3	136	254	256	61	87		3
7	1344.5	92.2	.23	1.4	134	255	257	61	87		3
8	1347	93.9	.27	1.7	131	256	257	62	87		3
9	1349.5	95.6	.19	1.2	131	257	258	62	88		3
10	1352	97.3	.19	1.2	132	253	257	62	87		3
11	1354.5	98.7	.14	.84	132	251	255	62	87		3
12	1357	99.9	.13	.78	133	250	256	63	87		3
1	1359.5	101.6	.19	1.2	134	249	257	63	87		3
2	1402	102.810	.14	.84	134	246	259	64	87		3
Avg/Tot.											
		36.864		1.19	132.4				86.4		
			4288								
		34928									

Impinger	1	2	3	4	5 Total	Traverse Point %'s
Final	260	110		217.2	6 Point	(4.4)(14.6)(29.8)(70.4)(85.4)(95.6)
Initial	100	100		208.5	12 Point	(2.1)(8.7)(11.8)(17.7)(25.0)(36.6)(64.4)(75.0)(82.3)(98.2)(99.3)(97.9)
Total						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	11.5					
CO2	8.6					

⊙ = 87, 431

103.8% I

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Facility:	RAYONIER	Meter #:	A-7	Baro. Press:	29.8	Page #:	1
Unit:	GRUBBER B	DH@:	1.703	Ambient Temp:	90	Pilot LC:	✓
Location:	Stack	DGM Factor:	0.9872	Nozzle Dia:	3.06		
Test Type:	METHOD 5	Pilot #:	P-06	Static P:	7.1		
Run #:	3	Pilot Coef:	.84	Stack Dimensions:	10'		
Condition:				Stack Height:	~150'		
Operator(s):	JBP	K-Factor:	6.6	Init. Leak Check:	2.001 cfm@ 15" Hg		
Date:	JUNE 9-2005	Filter#:		Final Leak Check:	2.001 cfm@ 15" 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	1453.5	4.9	.15	.90	142	253	254	67	87	87	3
2	1456	6.4	.17	1.0	141	255	257	62	85	85	3
3	1458.5	7.9	.19	1.1	140	254	258	61	85	85	4
4	1501	9.4	.22	1.3	139	251	258	61	85	85	5
5	1503.5	11.1	.24	1.4	138	248	259	61	84	84	5
6	1506	12.9	.23	1.4	138	247	258	62	84	84	5
7	1508.5	14.5	.20	1.2	140	249	253	62	84	84	5
8	1511	16.0	.17	1.0	140	249	254	62	84	84	5
9	1513.5	17.4	.18	1.1	140	248	253	62	85	85	5
10	1516	18.8	.15	.90	140	249	255	62	85	85	4
11	1518.5	20.2	.14	.84	138	248	255	63	85	85	4
12	1521	21.6	.13	.78	136	247	253	63	85	85	4
1522	"	"	"	"	"	"	"	"	"	"	"
B 1	1524.5	22.9	.15	1.1	139	248	250	66	85	85	5
2	1527	24.4	.22	1.3	133	249	252	63	85	85	6
2	1528.5	25.9	.23	1.4	134	248	251	58	85	85	6
4	1532	27.7	.22	1.3	134	247	256	58	85	85	6
5	1534.5	29.4	.22	1.3	138	243	251	59	85	85	6
6	1537	31.1	.21	1.3	139	240	247	59	85	85	6
7	1539.5	32.8	.19	1.1	141	243	251	59	85	85	6
8	1542	34.2	.19	1.1	144	246	252	60	85	85	6
9	1544.5	35.8	.20	1.2	141	252	251	60	85	85	6
10	1547	37.3	.19	1.1	140	247	248	60	84	84	6
11	1549.5	38.9	.18	1.1	141	241	246	60	84	84	6
12	1552	40.197	.14	.84	138	240	245	61	84	84	6
					138.9					84.8	
		36.67		1.128							
			4334								
		34.851									
						3.65 = .2227					

Avg/Tot.											
Impinger	1	2	3	4	5	Total Traverse Point %'s					
Final	360	105		207.1		6 Point (4.4)(14.6)(29.6)(70.4)(85.4)(85.6)					
Initial	100	106		200		12 Point (2.1)(8.7)(11.8)(17.7)(25.0)(35.9)(64.4)(75.0)(82.3)(88.2)(93.3)(97.9)					
Total				212.1		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	11.5										
CO2	8.0										

Q = 85,194  
106.3% I





BEST AVAILABLE COPY

STACK TEST REPORT

Facility:	RAYONIER	Meter #:	A7	Baro. Press:	29.65	Page #:	1
Unit:	SRB	DH@:	1.7103	Ambient Temp:	83	Pitot LC:	✓
Location:	Stack	DGM Factor:	0.9872	Nozzle Dia:	1.25		
Test Type:	MS	Pilot #:		Static P:	-46		
Run #:	3	Pilot Coef:	.84	Stack Dimensions:	88"		
Condition:				Stack Height:	275'		
Operator(s):	JBP	K-Factor:	3.3	Init. Leak Check:	0.004 cfm@ 15 "Hg		
Date:	06-08-05	Filter#:	488	Final Leak Check:	0.011 cfm@ 12 "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)	
	1248	46.118									
A1	1253	53.2	1.1	3.6	115	257	259	65	83	83	7
2	1258	58.4	1.0	3.3	115	254	260	62	84	84	7
3	1303	63.4	1.0	3.3	115	255	260	60	84	84	7
4	1308	68.4	.98	3.2	114	252	255	60	85	85	7
5	1313	73.4	.96	3.2	114	253	253	61	85	85	7
6	1318	78.423	.85	2.7	114	252	256	62	85	85	7
	1320										
B1	1325	82.9	.95	3.1	114	250	256	64	84	84	6
2	1330	87.8	.97	3.2	114	249	257	61	84	84	6
3	1335	92.8	1.0	3.3	114	251	257	61	85	85	7
4	1340	97.7	1.0	3.3	114	252	255	62	85	85	7
5	1345	102.2	.98	3.2	114	251	256	63	85	85	7
6	1350	107.743	.87	2.7	114	253	258	63	85	85	7
		59.652	.9852						84.5		
					114.3						
		57.0144		3.175							

BWS, 0994  
9006

Avg/Tot.																		
Impinger	1	2	3	4	5	Total	Traverse Point %'s											
Final	210	110		207		6 Point	(4.4)	(14.6)	(29.6)	(70.4)	(85.4)	(95.6)						
Initial	160	100		220.7		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					133.7	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	4.7	inst																
CO2	17.2																	

Q = 119,281

98.8% I

A

Visible Emission Observation Form

SOURCE NAME <i>Ravonier</i>			OBSERVATION DATE <i>6/10/05</i>				START TIME <i>0950</i>				STOP TIME <i>1050</i>					
ADDRESS <i>foot of Gum St.</i>			SEC				MIN				SEC					
			MIN	0	15	30	45	MIN	0	15	30	45				
CITY <i>Kennandine Beach</i>			STATE <i>FL</i>		ZIP		1	5	5	5	10	31	5	5	5	5
PHONE			SOURCE ID NUMBER				2	10	5	5	5	32	5	5	5	5
PROCESS EQUIPMENT <i>A-Bark Boiler</i>			OPERATING MODE				3	5	5	5	5	33	10	5	10	5
CONTROL EQUIPMENT <i>Wet Scrubber</i>			OPERATING MODE				4	5	5	5	5	34	5	10	15	15
DESCRIBE EMISSION POINT <i>START White stack STOP</i>							5	10	5	10	10	35	20	20	20	15
HEIGHT ABOVE GROUND LEVEL <i>START 175' STOP</i>			HEIGHT RELATIVE TO OBSERVER <i>START 175' STOP</i>				6	10	5	5	5	36	10	5	5	5
DISTANCE FROM OBSERVER <i>START 800' STOP</i>			DIRECTION FROM OBSERVER <i>START 255° STOP</i>				7	5	10	5	10	37	10	15	5	5
DESCRIBE EMISSIONS <i>START lifting plume STOP</i>							8	10	10	5	5	38	5	5	5	5
EMISSION COLOR <i>START black STOP</i>			PLUME TYPE CONTINUOUS <input checked="" type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>				9	5	5	5	5	39	5	5	5	5
WATER DROPLETS PRESENT <i>NO <input type="checkbox"/> YES <input checked="" type="checkbox"/></i>			IF WATER DROPLET PLUME ATTACHED <input checked="" type="checkbox"/> DETACHED <input type="checkbox"/>				10	5	5	5	5	40	5	5	5	5
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED <i>START 150' above STOP</i>							11	5	10	5	10	41	5	5	5	5
DESCRIBE BACKGROUND <i>START clear STOP</i>							12	5	10	5	5	42	5	5	5	5
BACKGROUND COLOR <i>START gray STOP</i>			SKY CONDITIONS <i>START overcast STOP</i>				13	5	5	5	5	43	5	5	5	5
WIND SPEED <i>START 4-7 STOP</i>			WIND DIRECTION <i>START SE STOP</i>				14	5	5	10	5	44	5	5	5	5
AMBIENT TEMP <i>START 82 STOP 82</i>			WET BULB TEMP <i>77</i>		RH. percent <i>90</i>		15	10	5	5	5	45	5	5	5	5
Source Layout Sketch <i>Draw North Arrow</i>							16	5	5	5	5	46	5	5	5	5
							17	5	5	5	5	47	5	5	5	5
							18	5	5	5	5	48	10	10	15	10
							19	5	5	5	5	49	10	5	5	5
							20	5	10	5	5	50	5	5	5	5
							21	5	5	5	5	51	10	10	5	5
							22	5	5	10	5	52	5	5	5	5
							23	5	5	5	5	53	5	5	5	5
							24	10	10	5	5	54	10	5	5	5
							25	5	5	5	5	55	5	5	5	5
							26	5	5	5	5	56	5	5	5	5
				27	5	10	5	10	57	5	10	5	5			
				28	5	5	5	5	58	5	5	5	5			
				29	5	5	5	5	59	5	5	5	5			
				30	5	5	5	5	60	5	5	5	5			
AVERAGE OPACITY FOR HIGHEST PERIOD			NUMBER OF HEADINGS ABOVE % WERE													
RANGE OF OPACITY READINGS			MINIMUM				MAXIMUM									
OBSERVER'S NAME (PRINT)			<i>F. Lee Garcia</i>													
OBSERVER'S SIGNATURE			<i>F. Lee Garcia</i>				DATE				<i>6/10/05</i>					
ORGANIZATION			<i>STACS</i>													
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY				<i>ETA</i>				DATE					
TITLE			DATE				VERIFIED BY				DATE					

9.6



B

Visible Emission Observation Form

SOURCE NAME <i>Rayonier</i>			OBSERVATION DATE <i>6/9/05</i>				START TIME <i>1108</i>				STOP TIME <i>1208</i>			
ADDRESS <i>Foot of Gum St.</i>			SEC MIN 0 15 30 45				SEC MIN 0 15 30 45							
CITY <i>Fernandina Beach</i>			STATE <i>FL</i>				ZIP							
PHONE			SOURCE ID NUMBER											
PROCESS EQUIPMENT <i>B-Bark Boiler</i>			OPERATING MODE											
CONTROL EQUIPMENT <i>Wet Scrubber</i>			OPERATING MODE											
DESCRIBE EMISSION POINT START <i>White stack</i> STOP <input checked="" type="checkbox"/>														
HEIGHT ABOVE GROUND LEVEL START <i>175'</i> STOP <input checked="" type="checkbox"/>			HEIGHT RELATIVE TO OBSERVER START <i>175'</i> STOP <input checked="" type="checkbox"/>											
DISTANCE FROM OBSERVER START <i>500'</i> STOP <input checked="" type="checkbox"/>			DIRECTION FROM OBSERVER START <i>250°</i> STOP <input checked="" type="checkbox"/>											
DESCRIBE EMISSIONS START <i>offering plume</i> STOP <input checked="" type="checkbox"/>														
EMISSION COLOR START <i>black</i> STOP <input checked="" type="checkbox"/>			PLUME TYPE CONTINUOUS <input checked="" type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>											
WATER DROPLETS PRESENT NO <input type="checkbox"/> YES <input checked="" type="checkbox"/>			IF WATER DROPLET PLUME ATTACHED <input checked="" type="checkbox"/> DETACHED <input type="checkbox"/>											
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START <i>250' above</i> STOP <input checked="" type="checkbox"/>														
DESCRIBE BACKGROUND START <i>sky</i> STOP <input checked="" type="checkbox"/>														
BACKGROUND COLOR START <i>blue/wh</i> STOP <input checked="" type="checkbox"/>			SKY CONDITIONS START <i>PC</i> STOP <input checked="" type="checkbox"/>											
WIND SPEED START <i>4-7</i> STOP <input checked="" type="checkbox"/>			WIND DIRECTION START <i>SE</i> STOP <input checked="" type="checkbox"/>											
AMBIENT TEMP. START <i>86</i> STOP <i>86</i>			WET BULB TEMP <i>76</i>				RH, percent <i>63</i>							
<p>Source Layout Sketch Draw North Arrow</p>			25				26				27			
			28				29				30			
			31				32				33			
			34				35				36			
			37				38				39			
			40				41				42			
			43				44				45			
			46				47				48			
			49				50				51			
			52				53				54			
			55				56				57			
			58				59				60			
36			AVERAGE OPACITY FOR HIGHEST PERIOD				NUMBER OF READINGS ABOVE % WERE							
			RANGE OF OPACITY READINGS MINIMUM				MAXIMUM							
			OBSERVER'S NAME (PRINT) <i>F. Lee Garcia</i>											
COMMENTS			OBSERVER'S SIGNATURE <i>F. Lee Garcia</i>				DATE <i>6/9/05</i>							
			ORGANIZATION <i>STACS</i>											
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY <i>ETA</i>				DATE							
TITLE			VERIFIED BY				DATE							

7.7

SRB

Visible Emission Observation Form

SOURCE NAME <i>Rayonier</i>			OBSERVATION DATE <i>6/8/85</i>				START TIME <i>0900</i>				STOP TIME				
ADDRESS <i>Foot of Green St.</i>			SEC MIN	0	15	30	45	SEC MIN	0	15	30	45			
CITY <i>Fernandina Beach</i>			STATE <i>FL</i>		ZIP		1			2			3		
PHONE			SOURCE ID NUMBER				4			5			6		
PROCESS EQUIPMENT <i>Sulfite Recovery Boiler</i>			OPERATING MODE				7			8			9		
CONTROL EQUIPMENT <i>Blinks Scrubbers</i>			OPERATING MODE				10			11			12		
DESCRIBE EMISSION POINT <i>White Stack</i>			START <i>STOP</i> ✓				13			14			15		
HEIGHT ABOVE GROUND LEVEL <i>275'</i>			HEIGHT RELATIVE TO OBSERVER <i>275'</i>				16			17			18		
DISTANCE FROM OBSERVER <i>100'</i>			DIRECTION FROM OBSERVER <i>265'</i>				19			20			21		
DESCRIBE EMISSIONS <i>leaking</i>			START <i>STOP</i> ✓				22			23			24		
EMISSION COLOR <i>white</i>			PLUME TYPE CONTINUOUS <input checked="" type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>				25			26			27		
WATER DROPLETS PRESENT <i>NO</i>			IF WATER DROPLET PLUME ATTACHED <input checked="" type="checkbox"/> DETACHED <input type="checkbox"/>				28			29			30		
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED <i>50' above</i>			START <i>STOP</i> ✓				31			32			33		
DESCRIBE BACKGROUND <i>sky</i>			START <i>STOP</i> ✓				34			35			36		
BACKGROUND COLOR <i>4c white</i>			SKY CONDITIONS <i>PC</i>				37			38			39		
WIND SPEED <i>4-7</i>			WIND DIRECTION <i>SE</i>				40			41			42		
AMBIENT TEMP <i>83</i>			WET BULB TEMP <i>79</i>		RH. percent		43			44			45		
Source Layout Sketch Draw North Arrow							46			47			48		
COMMENTS			AVERAGE OPACITY FOR HIGHEST PERIOD				49			50			51		
			RANGE OF OPACITY READINGS MINIMUM				52			53			54		
			OBSERVER'S NAME (PRINT) <i>F. Lee Garcia</i>				55			56			57		
			OBSERVER'S SIGNATURE <i>F. Lee Garcia</i>				58			59			60		
			ORGANIZATION <i>STACS</i>				61			62			63		
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY <i>ETA</i>				DATE <i>6/8/85</i>			64			65		
TITLE			DATE				66			67			68		
			VERIFIED BY				DATE			69			70		

19.6

**APPENDIX C**  
**CALIBRATION DATA**

Source Testing And Consulting Services  
Meter Box Calibration

Calibration Date: 8/31/2004      Orifice ID   Y Calibration   Delta H @ Cal.   Vac  
 Meter Box: A-7                              40            pass            pass            pass  
 Technician: MAD                             73            pass            pass            pass  
    48            pass            pass            pass  
    55            pass            pass            pass  
    63            pass            pass            pass

PART 1: Orifice Calibration											
Calibration Orifice Set: D1						Critical Vacuum: 13.9					
Barometric Pressure ( in. Hg ): 29.890											
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	0.27	40.806	46.422	81.00	81.00	80.00	81.00	17   30	0.2401	24
40	2	0.27	46.422	52.038	81.00	81.00	80.00	80.00	17   30	0.2401	24
73	1	3.50	52.038	62.851	81.00	81.00	80.00	80.00	10   0	0.8166	15
73	2	3.50	62.851	72.048	81.00	82.00	80.00	80.00	8   30	0.8166	15
48	1	0.62	72.048	77.873	82.00	81.00	80.00	80.00	12   30	0.3483	22
48	2	0.62	77.873	82.541	81.00	81.00	80.00	79.00	10   0	0.3483	22
55	1	1.10	82.541	89.594	81.00	81.00	79.00	79.00	11   30	0.4604	21
55	2	1.10	89.594	95.732	81.00	80.00	79.00	79.00	10   0	0.4604	21
63	1	1.90	95.732	103.619	80.00	81.00	79.00	79.00	10   0	0.5935	19
63	2	1.90	103.619	109.151	81.00	81.00	79.00	79.00	7   0	0.5935	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	5.616	5.47700	5.40205	81	80.5	0.9863	1.5560			
40	2	5.616	5.47700	5.40455	81	80	0.9868	1.5546			
AVE							0.9865	1.5553			
73	1	10.813	10.62911	10.50361	81	80	0.9882	1.7699			
73	2	9.197	9.03224	8.92806	81.5	80	0.9885	1.7683			
AVE							0.9883	1.7691			
48	1	5.825	5.68046	5.60006	81.5	80	0.9858	1.6977			
48	2	4.668	4.55638	4.48212	81	79.5	0.9837	1.6977			
AVE							0.9848	1.6977			
55	1	7.053	6.89247	6.81655	81	79	0.9890	1.7263			
55	2	6.138	6.00384	5.92744	80.5	79	0.9873	1.7279			
AVE							0.9881	1.7271			
63	1	7.887	7.72976	7.64104	80.5	79	0.9885	1.8031			
63	2	5.532	5.41670	5.34873	81	79	0.9875	1.8014			
AVE							0.9880	1.8023			
Average for All Runs								0.9872	1.7103		

Source Testing And Consulting Services  
Meter Box Calibration

Calibration Date: 8/31/2004  
 Meter Box: A-7  
 Technician: MAD

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
0.0	0	0	9.24	pass
32.0	30	-2	9.88	pass
70.0	67	-3	10.64	pass
100.0	97	-3	11.24	pass
200.0	199	-1	13.24	pass
500.0	498	-2	19.24	pass
1200.0	1200	0	33.24	pass
1995.0	1998	3	49.24	pass

Source Testing And Consulting Services  
Meter Box Calibration

Calibration Date: 9/1/2004      Orifice ID   Y Calibration   Delta H @ Cal.   Vac  
 Meter Box: A1                      73            pass            pass            pass  
 Technician: MAD                    40            pass            pass            pass  
    48            pass            pass            pass  
    55            pass            pass            pass  
    63            pass            pass            pass

PART 1: Orifice Calibration											
Calibration Orifice Set:										Critical Vacuum:	
Barometric Pressure ( in. Hg ): 29.920										13.9	
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
73	1	3.50	72.102	78.396	78.00	78.00	76.00	77.00	6   0	0.8166	18
73	2	3.50	78.396	84.687	78.00	79.00	77.00	77.00	6   0	0.8166	18
40	1	0.28	84.687	89.804	79.00	79.00	76.00	77.00	16   30	0.2401	24
40	2	0.28	89.804	94.780	79.00	79.00	77.00	77.00	16   0	0.2401	24
48	1	0.62	94.795	99.319	78.00	78.00	76.00	77.00	10   0	0.3483	23
48	2	0.62	99.319	103.840	78.00	78.00	77.00	77.00	10   0	0.3483	23
55	1	1.10	103.840	109.210	79.00	79.00	77.00	77.00	9   0	0.4604	21
55	2	1.10	109.210	115.174	79.00	79.00	77.00	77.00	10   0	0.4604	21
63	1	1.85	115.174	121.320	79.00	80.00	78.00	78.00	8   0	0.5935	20
63	2	1.85	121.320	127.476	80.00	80.00	78.00	78.00	8   0	0.5935	20
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 @			
73	1	6.294	6.22765	6.32903	78	76.5	1.0163	1.7665			
73	2	6.291	6.21890	6.32609	78.5	77	1.0172	1.7665			
AVE							1.0168	1.7665			
40	1	5.117	5.01401	5.11744	79	76.5	1.0206	1.6061			
40	2	4.976	4.87585	4.96006	79	77	1.0173	1.6076			
AVE							1.0189	1.6069			
48	1	4.524	4.44490	4.49915	78	76.5	1.0122	1.6960			
48	2	4.521	4.44195	4.49705	78	77	1.0124	1.6976			
AVE							1.0123	1.6968			
55	1	5.37	5.27252	5.34998	79	77	1.0147	1.7246			
55	2	5.964	5.85574	5.94442	79	77	1.0151	1.7246			
AVE							1.0149	1.7246			
63	1	6.146	6.03992	6.12465	79.5	78	1.0140	1.7534			
63	2	6.156	6.04415	6.12465	80	78	1.0133	1.7518			
AVE							1.0137	1.7526			
Average for All Runs								1.0153	1.7095		

Source Testing And Consulting Services  
Meter Box Calibration

Calibration Date: 9/1/2004  
 Meter Box: A1  
 Technician: MAD

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
0.0	0	0	9.24	pass
32.0	30	-2	9.88	pass
70.0	68	-2	10.64	pass
100.0	98	-2	11.24	pass
200.0	198	-2	13.24	pass
500.0	497	-3	19.24	pass
1200.0	1200	0	33.24	pass
1995.0	1996	1	49.24	pass

**Type S Pitot Tube Inspection Data Form**  
 Source Testing and Consulting Services, Inc  
 1100 Purple Glory Drive  
 Apex, NC 27502  
 PH(919)-367-2200/FAX(919)-367-2222

Pitot Tube I.D. # P006  
 Location Rayonier

Date 06-Jun-05  
 Tech. JBP

Quick Connects Attached & Leak Free? y  
 Pitot Tube Assembly Level? y

Parameter	Value	Acceptance Criteria	Results	Meets Criteria?
$\alpha_1 =$	<u>0°</u>	$\alpha_1 < 10°$	<u>0°</u>	TRUE
$\alpha_2 =$	<u>1°</u>	$\alpha_2 < 10°$	<u>1°</u>	TRUE
$\beta_1 =$	<u>0°</u>	$\beta_1 < 5°$	<u>0°</u>	TRUE
$\beta_2 =$	<u>2°</u>	$\beta_2 < 5°$	<u>2°</u>	TRUE
$\gamma =$	<u>0°</u>			
$\theta =$	<u>0°</u>			
A =	<u>0.729"</u>			
$z = A \sin \gamma =$	<u>0.000"</u>	$z < .125 \text{ in.}$	<u>0.000"</u>	TRUE
$w = A \sin \theta =$	<u>0.000"</u>	$w < 0.03125 \text{ in.}$	<u>0.000"</u>	TRUE
$P_A =$	<u>0.364"</u>	$1.05 Dt < P_A < 1.5 Dt$	<u>0.364"</u>	TRUE
$P_b =$	<u>0.362"</u>	$1.05 Dt < P_b < 1.5 Dt$	<u>0.362"</u>	TRUE
$D_t =$	<u>0.260"</u>	$0.18750" \leq Dt \leq 0.3750"$	<u>0.260"</u>	TRUE
		$P_A = P_b \pm 0.0630"$	<u>0.002"</u>	TRUE

Pitot Tube Acceptable ? ..... **TRUE**

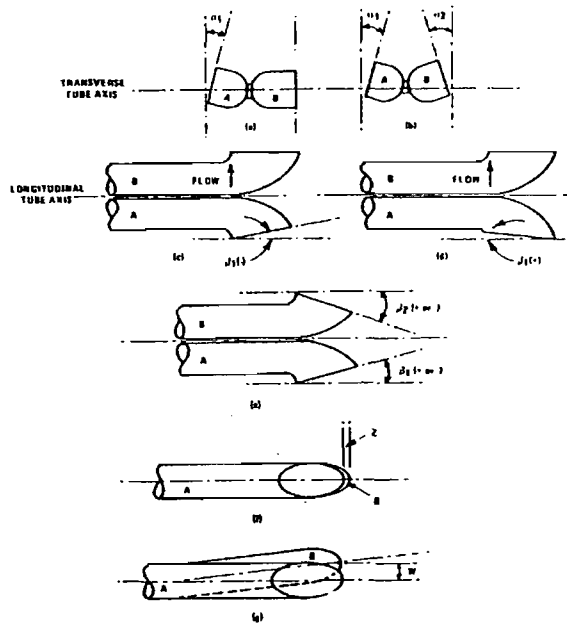
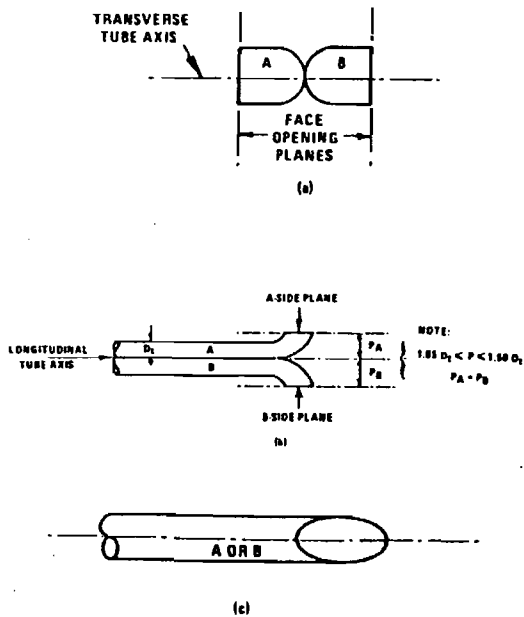


Figure 2-2. Properly constructed Type S pitot tube, shown in: (a) and view; face opening planes perpendicular to transverse axis; (b) top view; face opening planes parallel to longitudinal axis; (c) side view; both legs of equal length and centerlines coincident, when viewed from both sides. Baseline coefficient values of 0.84 may be assigned to pitot tubes constructed this way.

Figure 2-3. Types of face-opening misalignment that can result from field use or improper construction of Type S pitot tubes. These will not affect the baseline value of  $C_{pit}$  so long as  $\alpha_1$  and  $\alpha_2 \leq 10^\circ$ ,  $\beta_1$  and  $\beta_2 \leq 5^\circ$ ,  $z \leq 0.33 \text{ cm (1/8 in.)}$  and  $w \leq 0.08 \text{ cm (1/32 in.)}$  (citation 11 in Section 6).

**Type S Pitot Tube Inspection Data Form**  
 Source Testing and Consulting Services, Inc  
 1100 Purple Glory Drive  
 Apex, NC 27502  
 PH(919)-367-2200/FAX(919)-367-2222

Pitot Tube I.D. # P009  
 Location AEP

Date 14-Aug-04  
 Tech. MAD

Quick Connects Attached & Leak Free? y  
 Pitot Tube Assembly Level? y

Parameter	Value	Acceptance Criteria	Results	Meets Criteria?
$\alpha_1 =$	<u>1 °</u>	$\alpha_1 < 10 °$	<u>1 °</u>	TRUE
$\alpha_2 =$	<u>2 °</u>	$\alpha_2 < 10 °$	<u>2 °</u>	TRUE
$\beta_1 =$	<u>0 °</u>	$\beta_1 < 5 °$	<u>0 °</u>	TRUE
$\beta_2 =$	<u>1 °</u>	$\beta_2 < 5 °$	<u>1 °</u>	TRUE
$\gamma =$	<u>1 °</u>			
$\theta =$	<u>0 °</u>			
A =	<u>0.743 "</u>			
$z = A \sin \gamma =$	<u>0.013 "</u>	$z < .125 \text{ in.}$	<u>0.013 "</u>	TRUE
$w = A \sin \theta =$	<u>0.000 "</u>	$w < 0.03125 \text{ in.}$	<u>0.000 "</u>	TRUE
$P_A =$	<u>0.341 "</u>	$1.05 Dt < P_A < 1.5 Dt$	<u>0.341 "</u>	TRUE
$P_b =$	<u>0.374 "</u>	$1.05 Dt < P_b < 1.5 Dt$	<u>0.374 "</u>	TRUE
$D_t =$	<u>0.255 "</u>	$0.18750" \leq Dt \leq 0.3750"$	<u>0.255 "</u>	TRUE
		$P_A = P_b \pm 0.0630"$	<u>0.033 "</u>	TRUE

Pitot Tube Acceptable ? ..... TRUE

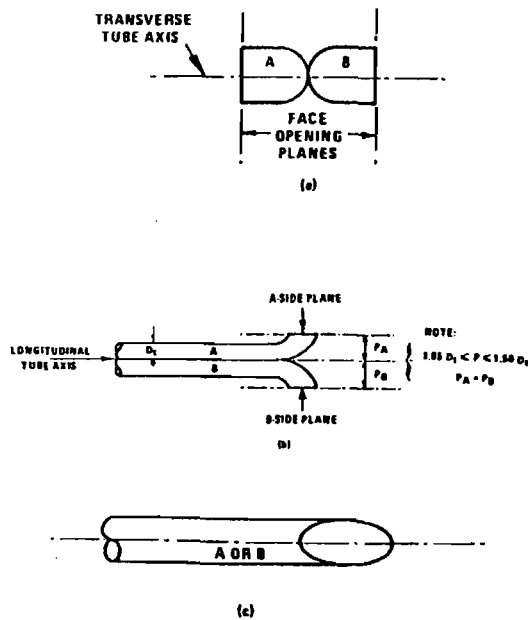


Figure 2-2. Properly constructed Type S pitot tube, shown in: (a) end view; face opening planes perpendicular to transverse axis; (b) top view; face opening planes parallel to longitudinal axis; (c) side view; both legs of equal length and centerline coincident, when viewed from both sides. Baseline coefficient values of 0.04 may be assigned to pitot tubes constructed this way.

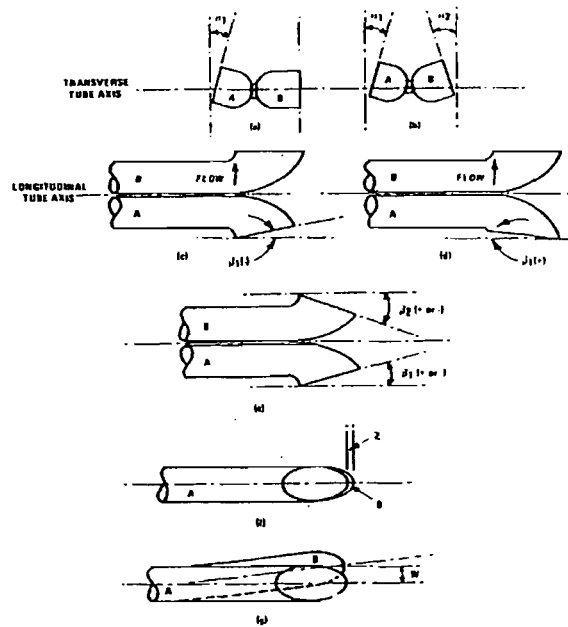


Figure 2-3. Types of face-opening misalignment that can result from field use or improper construction of Type S pitot tubes. These will not affect the baseline value of  $C_p(s)$  so long as  $\alpha_1$  and  $\alpha_2 \leq 10^\circ$ ,  $\beta_1$  and  $\beta_2 \leq 5^\circ$ ,  $z \leq 0.33 \text{ cm (1/8 in.)}$  and  $w \leq 0.08 \text{ cm (1/32 in.)}$  (citation 11 in Section 6).

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

<b>Plant:</b>	Rayonier	<b>Location:</b>	Scrubber A	<b>Run #</b>	1-A	2-A	3-A AVERAGE	
<b>Condition:</b>	Normal	<b>Meter #:</b>	A-1	<b>Date:</b>	6/10/05	6/10/05	6/10/05	
<b>Unit:</b>	Scrubber A	<b>Method:</b>	Method 5	<b>Start Time:</b>	9:50	12:35	15:08	
<b>Parameter</b>	<b>Units</b>			<b>Stop Time:</b>	11:23	13:37	16:09	
Sampling Time	min.				60.00	60.00	60.00	<b>60.0</b>
<b>GAS METER DATA:</b>								
Average Meter Differential Pressure	in. H2O				1.59	1.47	1.42	<b>1.49</b>
Absolute Meter Pressure	in. Hg				29.97	29.91	29.90	<b>29.93</b>
Average Meter Temperature	degrees F				85.4375	87	85.13	<b>85.85</b>
Metered Dry Sample Gas Volume	dcf				42.559	42	39.44	<b>41.33</b>
Gas Molecular Weight, Dry Basis	lb/lb-mole				30.00	29.94	29.80	<b>29.91</b>
<b>Pre Test Calibration Factors</b>								
DeltaH@	in. H2O				1.7095	1.7095	1.7095	<b>1.710</b>
Dry Gas Meter Correction Factor (gamma)	Dimensionless				1.0153	1.0153	1.0153	<b>1.0153</b>
<b>Post Test Data</b>								
Calculated Meter Correction Factor (Yqa)	Dimensionless				<b>1.0186</b>	<b>0.9958</b>	<b>1.0422</b>	<b>1.0189</b>
Difference (Post Test and Pretest Y - Maximum Allowed 5%)	%				<b>0.33%</b>	<b>-1.92%</b>	<b>2.65%</b>	<b>0.35%</b>



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

<b>Plant:</b>	Rayonier	<b>Location:</b>	Scrubber B	<b>Run #</b>	1-B	2-B	3-B AVERAGE
<b>Condition:</b>	Normal	<b>Meter #:</b>	A-7	<b>Date:</b>	6/9/05	6/9/05	6/9/05
<b>Unit:</b>	Scrubber B	<b>Method:</b>	Method 5	<b>Start Time:</b>	11:08	13:00	14:51
<b>Parameter</b>	<b>Units</b>	<b>Stop Time:</b>		12:14	14:02	15:52	
<b>Sampling Time</b>	min.			60.00	60.00	60.00	<b>60.0</b>
<b>GAS METER DATA:</b>							
Average Meter Differential Pressure	in. H2O			1.21	1.1625	1.14	<b>1.17</b>
Absolute Meter Pressure	in. Hg			29.89	29.89	29.88	<b>29.89</b>
Average Meter Temperature	degrees F			88.46	86.5	84.79	<b>86.58</b>
Metered Dry Sample Gas Volume	dcf			37.518	36.864	36.67	<b>37.02</b>
Gas Molecular Weight, Dry Basis	lb/lb-mole			29.82	29.84	29.74	<b>29.80</b>
<b>Pre Test Calibration Factors</b>							
DeltaH@	in. H2O			1.7103	1.7103	1.7103	<b>1.710</b>
Dry Gas Meter Correction Factor (gamma)	Dimensionless			0.9872	0.9872	0.9872	<b>0.9872</b>
<b>Post Test Data</b>							
Calculated Meter Correction Factor (Yqa)	Dimensionless			<b>1.0148</b>	<b>1.0104</b>	<b>1.0038</b>	<b>1.0097</b>
Difference (Post Test and Pretest Y - Maximum Allowed 5%)	%			<b>2.80%</b>	<b>2.35%</b>	<b>1.68%</b>	<b>2.28%</b>

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

<b>Plant:</b>	Rayonier	<b>Location:</b>	sulfite Recovery Boiler	<b>Run #</b>	1	2	3	AVERAGE
<b>Condition:</b>	Normal	<b>Meter #:</b>	A-7	<b>Date:</b>	6/8/05	6/8/05	6/8/05	
<b>Unit:</b>	Sulfite Recovery Boiler	<b>Method:</b>	Method 5	<b>Start Time:</b>	9:00	11:05	12:48	
<b>Parameter</b>	<b>Units</b>	<b>Stop Time:</b>		10:05	12:08	13:50		
Sampling Time	min.			60.00	60.00	60.00		<b>60.0</b>
<b>GAS METER DATA:</b>								
Average Meter Differential Pressure	in. H2O			2.72	3.04	3.11		<b>2.96</b>
Absolute Meter Pressure	in. Hg			29.85	29.87	29.88		<b>29.87</b>
Average Meter Temperature	degrees F			83.00	84.83	84.50		<b>84.11</b>
Metered Dry Sample Gas Volume	dcf			54.558	58.257	59.625		<b>57.48</b>
Gas Molecular Weight, Dry Basis	lb/lb-mole			30.50	30.53	30.47		<b>30.50</b>
<b>Pre Test Calibration Factors</b>								
DeltaH@	in. H2O			1.7103	1.7103	1.7103		<b>1.710</b>
Dry Gas Meter Correction Factor (gamma)	Dimensionless			0.9872	0.9872	0.9872		<b>0.9872</b>
<b>Post Test Data</b>								
Calculated Meter Correction Factor (Yqa)	Dimensionless			<b>1.0297</b>	<b>1.0212</b>	<b>1.0093</b>		<b>1.0200</b>
Difference (Post Test and Pretest Y - Maximum Allowed 5%)	%			<b>4.30%</b>	<b>3.44%</b>	<b>2.24%</b>		<b>3.33%</b>

# VISIBLE EMISSIONS EVALUATOR

This is to certify that

*Fernando Garcia*

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

326818

Certificate Number

*Raleigh, North Carolina*

Location

*March 1, 2005*

Date of Issue

*Thomas Hore*

President

*Michael W. Lunsford*

Director of Training

**APPENDIX D**  
**PROCESS DATA**

Rayonier

Fernandina Mill

Power Boilers Scrubber Test

Power Boiler Scrubber "A"  
 Date 6/10/2005  
 Run # A # 1

	Start of Test		End of Test		Totals	Time
	hours	min	hours	min	min	Corrected
<b>Boiler No. 1</b>	9	50	11	23	93	0.64516
Steam Flow Integrator (x 1000)	282.8		435.6		152800	98580.6 lb/hr
Steam Temperature (° F)	757.9		787.3		772.6	
Drum Pressure (psig)	435.5		351.4		393.45	
Oil Flow Intergrator (bbls.)	62.6		91.7		29.1	789 gal/hr
Steam Flow (lb/hr x 1000)	118.2		104.6		111.4	
Oil Flow (gpm)	14.4		13.2		13.8	
<b>Boiler No. 2</b>						
Steam Flow Integrator (x 1000)	242.7		395.5		152800	98580.6 lb/hr
Steam Temperature (° F)	695.4		716.7		706.05	
Drum Pressure (psig)	418.6		348.3		383.45	
Oil Flow Intergrator (bbls.)	9		9		0	0 gal/hr
Steam Flow (lb/hr x 1000)	84		107.9		95950	
Oil Flow (gpm)	0		0		0	0 gal/hr
<b>Bark Integrator</b>	67.5		111.3		43.8	28 wet/tons/hr
Bark to Boiler: Num.(s) <u>2</u> And / or <u>3</u>						
<b>Scrubber "A" pH</b>	5.2		5.4		5.3	

Rayonier

Fernandina Mill

Power Boilers Scrubber Test

Power Boiler Scrubber "A"  
 Date 6/10/2005  
 Run # 2

	Start of Test		End of Test		Totals	Time
	hours	min	hours	min	min	Corrected
<b>Boiler No. 1</b>	12	35	13	39	64	0.9375
Steam Flow Integrator (x 1000)	515.6		629.1		113500	106406 lb/hr
Steam Temperature (° F)	773.5		778.9		776.2	
Drum Pressure (psig.)	441.2		330.1		385.65	
Oil Flow Intergrator (bbls.)	109.9		130.7		20.8	819 gal/hr
Steam Flow (lb/hr x 1000)	108.9		110		109.45	
Oil Flow (gpm)	15.3		12.9		14.1	
<b>Boiler No. 2</b>						
Steam Flow Integrator (x 1000)	496.9		618.7		121800	114188 lb/hr
Steam Temperature (° F)	699.8		701.3		700.55	
Drum Pressure (psig.)	439.8		325		382.4	
Oil Flow Intergrator (bbls.)	11.8		15.3		3.5	138 gal/hr
Steam Flow (lb/hr x 1000)	116.3		107.1		111700	
Oil Flow (gpm)	2.5		0		1.25	75 gal/hr
<b>Bark Integrator</b>	146.8		177.2		30.4	29 wet/tons/hr
Bark to Boiler: Num.(s) <u>2</u> And / or <u>3</u>						
<b>Scrubber "A" pH</b>	5.3		5.4		5.4	

Rayonier

Fernandina Mill

Power Boilers Scrubber Test

Power Boiler Scrubber "A"  
 Date 6/10/2005  
 Run # 3

	Start of Test		End of Test		Totals	Time
	hours	min	hours	min	min	Corrected
<b>Boiler No. 1</b>	3	07	4	09	62	0.96774
Time						
Steam Flow Integrator (x 1000)	746.5		859.1		112600	108968 lb/hr
Steam Temperature (° F)	766.8		777.5		772.15	
Drum Pressure (psig)	408.3		314.3		361.3	
Oil Flow Intergrator (bbls.)	156.7		176.4		19.7	801 gal/hr
Steam Flow (lb/hr x 1000)	111.7		95.4		103.55	
Oil Flow (gpm)	14		12.7		13.35	
<b>Boiler No. 2</b>						
Steam Flow Integrator (x 1000)	721.1		850		128900	124742 lb/hr
Steam Temperature (° F)	678.7		698.8		688.75	
Drum Pressure (psig)	401.6		310.2		355.9	
Oil Flow Intergrator (bbls.)	18.1		23.5		5.4	219 gal/hr
Steam Flow (lb/hr x 1000)	106.2		98.2		102200	
Oil Flow (gpm)	4.5		2.5		3.5	210 gal/hr
<b>Bark Integrator</b>	206.8		225.5		18.7	18 wet/tons/hr
Bark to Boiler: Num.(s) <u>2</u> And / or <u>3</u>						
Scrubber "A" pH	4.9		5.0		5.0	

Rayonier

Fernandina Mill

"A" SCRUBBER STACK TEST ANALYSIS for 10-Jun-05

Steam Output from No. 1 & No. 2 Power Boilers

Run	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]		
Number	Power Boiler No. 1	Power Boiler No. 2	Total
1	99	99	197

Average	99	99	197
Capacity	120	120	240

A Scrubber Actual Total % of Capacity = 82%

Oil Input to Boilers

Run	Power Boiler No. 1				Power Boiler No. 2			
	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
1	1222.2	93	158,104	125	0	93	158,104	0
Average	1,222	93	158,104	125	0	93	158,104	0
Permit Maximum	[ mmBTU/hr ]			185	184			

Allowable Particulate Emissions Calculation

Test total BTU Input from Oil for A Scrubber	125	MM BTU/hr.	
Maximum Steam Output from 1 & 2 PB	240,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	82%		
Test Steam Output Rate	197,161	lb./hr. [240,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	81,034	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark [by difference]	116,127	lb./hr.	
Boiler Efficiency on Bark	55%	Permit Max.	
Test Heat Input from Bark	211	mmBTU/hr.	218
Emissions Factor for Bark	0.23	lb. PM/MMBTU	
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	48.6	lb. PM/hr [emissions factor x heat input]	50.6 #2 Bark Only
Allowable Emissions from Oil	10.7	lb. PM/hr [emissions factor x heat input]	15.2 #2 Oil Only
Total Allowable Emissions for A Scrubber	59.3	lb. PM/hr. (Including Oil Emissions)	16.0 #1 Oil Only
Total Allowable Emissions for A Scrubber	59.3	lb. PM/hr. (By Oil Emissions Factor or Permit)	
Actual emissions for A Scrubt Jun 2005 test]	31.5	lb. PM/hr.	

pbem397.xls



Rayonier

Fernandina Mill

"A" SCRUBBER STACK TEST ANALYSIS for 10-Jun-05

Steam Output from No. 1 & No. 2 Power Boilers

Run Number	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]		
	Power Boiler No. 1	Power Boiler No. 2	Total
2	106	114	221

Average	106	114	221
Capacity	120	120	240

A Scrubber Actual Total % of Capacity = 92%

Oil Input to Boilers

Run Number	Power Boiler No. 1				Power Boiler No. 2			
	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
2	873.6	64	158,104	129	147	64	158,104	22
Average	874	64	158,104	129	147	64	158,104	22

Permit Maximum	[ mmbTU/hr ]	185	184
----------------	--------------	-----	-----

Allowable Particulate Emissions Calculation

Test total BTU Input from Oil for A Scrubber	151	MM BTU/hr.		
Maximum Steam Output from 1 & 2 PB	240,000	lb./hr. [1000 BTU Steam]		
Test Operating Rate	92%			
Test Steam Output Rate	220,594	lb./hr. [240,000 x test operating rate]		
Boiler Efficiency on Oil	65%			
Test Steam from Oil	98,329	lb./hr. [total input from oil x Eff. on oil]		
Test Steam from Bark [by difference]	122,264	lb./hr.		
Boiler Efficiency on Bark	55%		Permit Max.	
Test Heat Input from Bark	222	mmbTU/hr.	218	
Emissions Factor for Bark	0.23	lb. PM/MMBTU		Maximum By Permit
Emissions Factor for Oil	0.086	lb. PM/MMBTU		
Allowable Emissions from Bark	51.1	lb. PM/hr [emissions factor x heat input]		50.6 #2 Bark Only
Allowable Emissions from Oil	13.0	lb. PM/hr [emissions factor x heat input]		15.2 #2 Oil Only
Total Allowable Emissions for A Scrubber	64.1	lb. PM/hr.	(Including Oil Emissions)	16.0 #1 Oil Only
Total Allowable Emissions for A Scrubber	64.1	lb. PM/hr.	( By Oil Emissions Factor or Permit)	
Actual emissions for A Scrub Jun 2005 test]	25.0	lb. PM/hr.		

pbem397.xls

**Rayonier**

**Fernandina Mill**

"A" SCRUBBER STACK TEST ANALYSIS for 10-Jun-05

**Steam Output from No. 1 & No. 2 Power Boilers**

Run Number	Power Boiler No. 1	Power Boiler No. 2	Total
3	109	125	234

Average 109 125 234

Capacity 120 120 240

A Scrubber Actual Total % of Capacity = 97%

**Oil Input to Boilers**

Run Number	Power Boiler No. 1				Power Boiler No. 2			
	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
3	827.4	62	158,104	127	227	62	158,104	35
Average	827	62	158,104	127	227	62	158,104	35
Permit Maximum	[ mmBTU/hr ] 185			184				

**Allowable Particulate Emissions Calculation**

Test total BTU Input from Oil for A Scrubber	161	MM BTU/hr.	
Maximum Steam Output from 1 & 2 PB	240,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	97%		
Test Steam Output Rate	233,710	lb./hr. [240,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	104,843	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark [by difference]	128,867	lb./hr.	
Boiler Efficiency on Bark	55%	Permit Max.	
Test Heat Input from Bark	234	mmBTU/hr.	218
Emissions Factor for Bark	0.23	lb. PM/MMBTU	Maximum By Permit
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	53.9	lb. PM/hr [emissions factor x heat input]	50.6 #2 Bark Only
Allowable Emissions from Oil	13.9	lb. PM/hr [emissions factor x heat input]	15.2 #2 Oil Only
Total Allowable Emissions for A Scrubber	67.8	lb. PM/hr. (Including Oil Emissions)	16.0 #1 Oil Only
Total Allowable Emissions for A Scrubber	67.8	lb. PM/hr. (By Oil Emissions Factor or Permit)	
Actual emissions for A Scrubt Jun 2005 test]	22.6	lb. PM/hr.	

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"A" SCRUBBER STACK TEST ANALYSIS

for 10-Jun-05

Steam Output from No. 2 Power Boiler

Run Number	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]		
	Power Boiler No. 1	Power Boiler No. 2	Total
1	99	99	197
2	106	114	221
3	109	125	234
Average	102	106	209
Capacity	120	120	240
A Scrubber Actual Total % of Capacity =			87%

Oil Input to Boiler

Run Number	Power Boiler No. 1				Power Boiler No. 2			
	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
1	1222	93	158,104	125	0	93	158104	0.0
2	874	64	158104	129	147	64	158104	21.8
3	827	62	158,104	127	227	62	158,104	34.7
Average	1048	79	158,104	127	74	79	158,104	11
Permit Maximum	[ mmBTU/hr ]			185				184

Test Result per Stack test

31.51
25.03
22.59
26.4

Allowable Particulate Emissions Calculation

Test total BTU Input from Oil for B Scrubber	138	MM BTU/hr.	
Maximum Steam Output from 1 & 2 PB	240,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	87%		
Test Steam Output Rate	208,878	lb./hr. [135,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	89,682	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark [by difference]	119,196	lb./hr.	
Boiler Efficiency on Bark	55%		Permit Max.
Test Heat Input from Bark	217	mmBTU/hr.	218
Emissions Factor for Bark	0.23	lb. PM/MMBTU	
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	49.8	lb. PM/hr [emissions factor x heat input]	50.6 #2 Bark Only
Allowable Emissions from Oil	11.9	lb. PM/hr [emissions factor x heat input]	15.2 #2 Oil Only
Total Allowable Emissions for A Scrubber	61.7	lb. PM/hr. (Including Oil Emissions)	16.0 #1 Oil Only
Total Allowable Emissions for A Scrubber	61.7	lb. PM/hr. ( By Oil Emissions Factor or Permit)	
Actual emissions for A Scrubber 10-Jun-05 Test	26.4	lb. PM/hr.	

**Power Boilers Scrubber Test**

Power Boiler Scrubber **"B"**  
 Date 09-Jun-05  
 Run # B # 1

**Boiler No. 3**

Steam Flow Integrator (x 1000) \_\_\_\_\_  
 Steam Temperature (° F) \_\_\_\_\_  
 Drum Pressure (psig.) \_\_\_\_\_  
 Oil Flow Intergrator (bbl.) \_\_\_\_\_  
 Steam Flow (lb/hr x 1000) \_\_\_\_\_  
 Oil Flow (gpm) \_\_\_\_\_

**Bark Integrator**

Bark to Boiler: Num.(s) 2 And / or 3

Scrubber "B" pH

	Start of Test		End of Test		Totals	Time
	hours	min	hours	min	min	corrected
Time	11	08	12	14	66	0.90909
Steam Flow Integrator (x 1000)	455.1		574		118900	108091 lb/hr
Steam Temperature (° F)	751.5		718.6		735.05	
Drum Pressure (psig.)	542.6		321.3		431.95	
Oil Flow Intergrator (bbl.)	2.2		2.3		0.1	3.81818 gal/hr
Steam Flow (lb/hr x 1000)	108.4		121.8		115100	
Oil Flow (gpm)	0		0		0	
<b>Bark Integrator</b>	137.1		162.7		25.6	23 wet/tons/hr
Scrubber "B" pH	7.7		7.8		7.8	

**Power Boilers Scrubber Test**

Power Boiler Scrubber **"B"**  
 Date 09-Jun-05  
 Run # B # 2

**Boiler No. 3**

	<u>Start of Test</u>	<u>End of Test</u>	<u>Totals</u>	<u>Time</u>	
	hours min	hours min	min	corrected	
<i>Time</i>	1 00	2 03	63	0.95238	
<i>Steam Flow Integrator (x 1000)</i>	650.6	781.1	130500	124286	lb/hr
<i>Steam Temperature (° F)</i>	744.6	724.1	734.35		
<i>Drum Pressure (psig.)</i>	535.4	403.2	469.3		
<i>Oil Flow Intergrator (bbl.)</i>	4.2	23.5	19.3	772	gal/hr
<i>Steam Flow (lb/hr x 1000)</i>	122.5	141.1	131800		
<i>Oil Flow (gpm)</i>	12.4	13.3	12.85		
<b>Bark Integrator</b>	186.3	209.3	23	22	wet/tons/hr
<b>Bark to Boiler:</b>	Num.(s) <u>2</u> And / or <u>3</u>				
<i>Scrubber "B" pH</i>	7.6	5.9	6.8		

**Power Boilers Scrubber Test**

Power Boiler Scrubber **"B"**  
 Date 09-Jun-05  
 Run # B # 3

**Boiler No. 3**

	<u>Start of Test</u>		<u>End of Test</u>		<u>Totals</u>	<u>Time</u>
	hours	min	hours	min	min	<i>corrected</i>
<i>Time</i>	2	50	3	52	62	0.96774
Steam Flow Integrator (x 1000)	849.8		966.5		116700	112935 lb/hr
Steam Temperature (° F)	787.9		721		754.45	
Drum Pressure (psig.)	509.5		399		454.25	
Oil Flow Intergrator (bbl.)	28.6		28.9		0.3	12.1935 gal/hr
Steam Flow (lb/hr x 1000)	131		140		135500	
Oil Flow (gpm)	0		0		0	
<b>Bark Integrator</b>	228.8		259.7		30.9	30 wet/tons/hr
Bark to Boiler: Num.(s)	<u>2</u>		<u>3</u>			
Scrubber "B" pH	6.3		7.4		6.85	

**"B" SCRUBBER STACK TEST ANALYSIS**

for 9-Jun-05

**Steam Output from No. 3 Power Boiler**

Run Number	Power Boiler No. 3	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]
1	108	

Average 108

Capacity 135

B Scrubber Actual Total % of Capacity = 80%

**Oil Input to Boiler**

Power Boiler No. 3				
Run Number	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
1	4.2	66	158,104	1
<b>Average</b>				
	4	66	158,104	1
Permit Maximum on Oil		[mmBtu/hr]	207	
Permit Maximum on Bark		[mmBtu/hr]	245	

**Allowable Particulate Emissions Calculation**

Test total BTU Input from Oil for B Scrubber	1	MM BTU/hr.	
Maximum Steam Output from 3 PB	135,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	80%		
Test Steam Output Rate	108,091	lb./hr. [135,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	392	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark [by difference]	107,699	lb./hr.	
Boiler Efficiency on Bark	55%		Permit Max.
Test Heat Input from Bark	196	mmBTU/hr.	<span style="border: 1px solid black; padding: 2px;">245</span>
Emissions Factor for Bark	0.207	lb. PM/MMBTU	
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	40.5	lb. PM/hr [emissions factor x heat input]	<span style="border: 1px solid black; padding: 2px;">50.6</span> #3Bark Only
Allowable Emissions from Oil	0.1	lb. PM/hr [emissions factor x heat input]	<span style="border: 1px solid black; padding: 2px;">16.7</span> #3 Oil Only
<b>Total Allowable Emissions for B Scrubber</b>	<b>40.6</b>	<b>lb. PM/hr.</b>	<b>(Including Oil Emissions)</b>
<b>Total Allowable Emissions for B Scrubber</b>	<b>40.6</b>	<b>lb. PM/hr.</b>	<b>( By Oil Emissions Factor or Permit)</b>
<b>Actual emissions for B Scrubber</b>	<b>9-Jun-05 Test</b>	<b>27.5</b>	<b>lb. PM/hr.</b>

**"B" SCRUBBER STACK TEST ANALYSIS**

for 9-Jun-05

**Steam Output from No. 3 Power Boiler**

Run Number	Power Boiler No. 3	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]
2	124	

Average 124

Capacity 135

B Scrubber Actual Total % of Capacity = 92%

**Oil Input to Boiler**

Power Boiler No. 3				
Run Number	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
2	810.6	63	158,104	122
<b>Average</b>				
	811	63	158,104	122
Permit Maximum on Oil [mmBtu/hr]				207
Permit Maximum on Bark [mmBtu/hr]				245

**Allowable Particulate Emissions Calculation**

Test total BTU Input from Oil for B Scrubber	122	MM BTU/hr.	
Maximum Steam Output from 3 PB	135,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	92%		
Test Steam Output Rate	124,286	lb./hr. [135,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	79,337	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark [by difference]	44,949	lb./hr.	
Boiler Efficiency on Bark	55%	Permit Max.	
Test Heat Input from Bark	82	mmBTU/hr.	<span style="border: 1px solid black; padding: 2px;">245</span>
Emissions Factor for Bark	0.207	lb. PM/MMBTU	
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	16.9	lb. PM/hr [emissions factor x heat input]	<span style="border: 1px solid black; padding: 2px;">50.6</span> #3Bark Only
Allowable Emissions from Oil	10.5	lb. PM/hr [emissions factor x heat input]	<span style="border: 1px solid black; padding: 2px;">16.7</span> #3 Oil Only
Total Allowable Emissions for B Scrubber	27.4	lb. PM/hr.	(Including Oil Emissions)
Total Allowable Emissions for B Scrubber	27.4	lb. PM/hr.	( By Oil Emissions Factor or Permit)
Actual emissions for B Scrubber	9-Jun-05 Test	22.2	lb. PM/hr.



**"B" SCRUBBER STACK TEST ANALYSIS**

for 9-Jun-05

**Steam Output from No. 3 Power Boiler**

Run Number	Power Boiler No. 3	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]
3	113	

Average 113

Capacity 135

B Scrubber Actual Total % of Capacity = 84%

**Oil Input to Boiler**

Power Boiler No. 3				
Run Number	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
3	13	62	158,104	2
<hr/>				
Average	13	62	158,104	2
<hr/>				
Permit Maximum on Oil			[mmBtu/hr]	207
Permit Maximum on Bark			[mmBtu/hr]	245

**Allowable Particulate Emissions Calculation**

Test total BTU Input from Oil for B Scrubber	2	MM BTU/hr.		
Maximum Steam Output from 3 PB	135,000	lb./hr. [1000 BTU Steam]		
Test Operating Rate	84%			
Test Steam Output Rate	112,935	lb./hr. [135,000 x test operating rate]		
Boiler Efficiency on Oil	65%			
Test Steam from Oil	1,253	lb./hr. [total input from oil x Eff. on oil]		
Test Steam from Bark [by difference]	111,682	lb./hr.		
Boiler Efficiency on Bark	55%		Permit Max.	
Test Heat Input from Bark	203	mmBTU/hr.	<span style="border: 1px solid black; padding: 2px;">245</span>	
Emissions Factor for Bark	0.207	lb. PM/MMBTU		
Emissions Factor for Oil	0.086	lb. PM/MMBTU		
Allowable Emissions from Bark	42.0	lb. PM/hr [emissions factor x heat input]		<span style="border: 1px solid black; padding: 2px;">50.6</span> #3Bark Only
Allowable Emissions from Oil	0.2	lb. PM/hr [emissions factor x heat input]		<span style="border: 1px solid black; padding: 2px;">16.7</span> #3 Oil Only
Total Allowable Emissions for B Scrubber	42.2	lb. PM/hr.	(Including Oil Emissions)	
Total Allowable Emissions for B Scrubber	42.2	lb. PM/hr.	( By Oil Emissions Factor or Permit)	
Actual emissions for B Scrubber 9-Jun-05 Test	31.9	lb. PM/hr.		

**"B" SCRUBBER STACK TEST ANALYSIS**

for 9-Jun-05

**Steam Output from No. 3 Power Boiler**

Run Number	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]
1	108
2	124
3	113
Average	115
Capacity	135

B Scrubber Actual Total % of Capacity = 85%

**Oil Input to Boiler**

Power Boiler No. 3					
Run Number	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil	Test Result per Stack test
1	4.2	66	158,104	1	27.54
2	810.6	63	158,104	122	22.18
3	12.6	62	158,104	2	31.92
Average	276	64	158,104	42	27.21
Permit Maximum	[mmBtu/hr]			207	

**Allowable Particulate Emissions Calculation**

Test total BTU Input from Oil for B Scrubber	42	MM BTU/hr.	
Maximum Steam Output from 3 PB	135,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	85%		
Test Steam Output Rate	115,104	lb./hr. [135,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	26,994	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark [by difference]	88,110	lb./hr.	
Boiler Efficiency on Bark	55%	Permit Max.	
Test Heat Input from Bark	160	mmBTU/hr	<span style="border: 1px solid black; padding: 2px;">245</span>
Emissions Factor for Bark	0.207	lb. PM/MMBTU	Permit Maximum
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	33.2	lb. PM/hr [emissions factor x heat input]	50.6
Allowable Emissions from Oil	3.6	lb. PM/hr [emissions factor x heat input]	16.7
Total Allowable Emissions for B Scrubber	36.7	lb. PM/hr.	(Including Oil Emissions)
Total Allowable Emissions for B Scrubber	36.7	lb. PM/hr.	( By Oil Emissions Factor or Permit)
Actual emissions for B Scrubber	9-Jun-05 Test	27.2	lb. PM/hr.

### Recovery Boiler Compliance Test

Date: 8-Jun-05

Run: # 1

	Start of Test		End of Test		Difference	%of hour	
	hour	min	hour	min			
Time	9	02	10	02	60	1	
"B" Liquor Flow, gallons	25747.5		36240.6		10493.1	10493.1	gph
Liquor Flow, gpm meter	176		174		175	10500	gph
Liquor Temperature, deg F	193		194		193.5		
Liquor Hydrometer Reading	1.25		1.245		1.2475		
Liquor solids, % OD	59		58.3		58.65		
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	372		376		374		
Steam Flow Integrator x 1000, lb	935.5		1309.7		374200	374200	lb/hr
Steam Temperature, deg F	875		876		875.5		
Steam Pressure, psi	992		993		992.5		
SO <sub>2</sub> , ppm	147.969		242.566		195.2675		

Liquor Flow Calculation	(gph)(8.345)(sp.gr.)(%OD)	64109.77 lb/hr
-------------------------	---------------------------	----------------

Integrator Calculation: TSP Mass Emission Rate results: 12.37 lb/hr

(End of test value - Start of test value)(60 min./hr / Test time, min.) = Units/hr

### Recovery Boiler Compliance Test

Date: 8-Jun-05

Run: # 2

	Start of Test		End of Test		Difference	%of hour	
	hour	min	hour	min			
Time	11	06	12	11	65	0.923077	
"B" Liquor Flow, gallons	49546.6		58766		9219.4	8510.215	gph
Liquor Flow, gpm meter	175		175		175	10500	gph
Liquor Temperature, deg F	194		194		194		
Liquor Hydrometer Reading	1.26		1.255		1.2575		
Liquor solids, % OD	60.9		60.1		60.5		
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	379		378		378.5		
Steam Flow Integrator x 1000, lb	1787.3		2122.1		334800	309046.2	lb/hr
Steam Temperature, deg F	876		876		876		
Steam Pressure, psi	993		996		994.5		
SO2, ppm	117.874		113.084		115.479		

Liquor Flow Calculation	(gph)(8.345)(sp.gr.)(%OD)	66662.10 lb/hr
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Integrator Calculation: TSP Mass Emission Rate results: 28.72 lb/hr

(End of test value - Start of test value)(60 min./hr / Test time, min.) = Units/hr

### Recovery Boiler Compliance Test

Date: 8-Jun-05

Run: # 3

Time	Start of Test		End of Test		Difference	%of hour	
	hour	min	hour	min			
Time	12	48	13	49	61	0.983607	
"B" Liquor Flow, gallons	65760.8		75671		9910.2	9747.738	gph
Liquor Flow, gpm meter	175		172		173.5	10410	gph
Liquor Temperature, deg F	194		194		194		
Liquor Hydrometer Reading	1.255		1.255		1.255		
Liquor solids, % OD	60.1		60.1		60.1		
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	376		373		374.5		
Steam Flow Integrator x 1000, lb	2376.2		2734.6		358400	352524.6	lb/hr
Steam Temperature, deg F	873		869		871		
Steam Pressure, psi	987		987		987		
SO2, ppm	22.804		23.672		23.238		

Liquor Flow Calculation	(gph)(8.345)(sp.gr.)(%OD)	61354.78 lb/hr
-------------------------	---------------------------	----------------

Integrator Calculation: TSP Mass Emission Rate results: 24.48 lb/hr

(End of test value - Start of test value)(60 min./hr / Test time, min.) = Units/hr

**Sulfite Recovery Boiler Scrubber Stack Test Analysis**

for 8-Jun-05

**Steam Output from the Sulfite Recovery Boiler**

Run	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]
Number	Sulfite Recovery Boiler
1	374
2	309
3	353
Average	345

Oil Input to Boiler					Liquor Input to Boiler		Test Result
Sulfite Recovery Boiler							Particulate
Run	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr	Gal.	Liquor Flow	(per Stack test)
Number				from Oil	Liquor	lbs/hr.	lbs/hr.
1	0	60	158,104	0	10493	64,110	12.4
2	0	65	158,104	0	8510	66,662	28.7
3	0	61	158,104	0	9748	61,355	24.5
Average	0	62	158,104	0	9,584	64,042	21.9

Permit Maximum	[lbs/hr. SSL]	70,000
Recovery Boiler Actual Total % of Capacity =		91%
Standard Operating Max		63,000
Percent of Standard Operating Max		102%

Permit Maximum (particulate)	43.18 lbs/hr.
Permit Maximum (particulate)	43.18 lbs/hr.
Permit Limit	2.5 PM lb/ADTUP
Test Value	0.80 PM lb/ADTUP

	Test Value	21.9	PM lb/hr
	Test Value	0.80	PM lb/ADTUP
	Permit Limit	2.5	PM lb/ADTUP
		64,042	lb SSLS/hr
Entry from		27	ADTUP/hr
previous operating years Data	lb SSLS/ADTUP	2,330	

**APPENDIX E**  
**PROJECT PARTICIPANTS**



## PROJECT PARTICIPANTS

### STACS

Bill Mayhew	Project Manager
Jon Proulx	Scientist
Lee Garcia	Chief Technician
Geoff Johnson	Scientist
Aaron Harden	Document Coordinator

### RAYONIER

Ronnie Moore	Coordinator
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**GASEOUS EMISSIONS TEST REPORT  
FOR  
SULFITE RECOVERY BOILER AND SCRUBBERS A & B  
AT  
RAYONIER  
FERNANDINA BEACH, FLORIDA**

**Prepared for:**

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P.O. Box 2002  
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Fernandina Beach, Florida 32034**

**Prepared by:**

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Apex, North Carolina 27502**

**July 2004**

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## **1.0 INTRODUCTION**

## 1.0 INTRODUCTION

Under contract to Rayonier, Source Testing And Consulting Services, Inc. (STACS) performed a series of emission tests at Rayonier's Fernandina Beach, Florida facility. Emission testing was performed for the sulfite recovery boiler and scrubbers A & B. The purpose of the tests was to demonstrate ongoing compliance with the emissions limits for particulate matter and visible emissions, and to provide supplemental metals and gaseous emissions data for the units. This document presents the results from the gaseous emissions testing. Results from the particulate and visible emissions tests have been previously submitted.

All testing followed the procedures and quality control guidelines as prescribed in EPA Methods 3A, 6C, 10 and 7E of (40 CFR Pt 60, Appendix A). Gaseous tests were sampled concurrent with particulate testing. Testing at the sulfite recovery boiler occurred on May 25, 2004. The gaseous tests at scrubber B & A occurred on June 9th and 10<sup>th</sup> 2004, respectively.

The test methods that were used for this test program are listed briefly below:

- |                |  |
|----------------|--|
| EPA Method 3A: | Continuous determination of oxygen and/or carbon dioxide content in the flue gas. An paramagnetic analyzer is used for O <sub>2</sub> determination for this test program. |
| EPA Method 6C: | Determination of Sulfur Dioxide using continuous instrumental techniques. Analysis is by ultraviolet spectroscopy (RATAS).   |
| EPA Method 7E: | Determination of nitrogen oxides using continuous emissions monitoring techniques with a chemiluminescent analyzer (RATAS).  |

EPA Method 10: Determination of carbon monoxide using continuous emissions monitoring techniques with a gas filter correlation/non-dispersive infrared (GFC/NDIR)

All procedures and quality control guidelines specified in the appropriate methods, including 40CFR60 Appendix A, and in the EPA Quality Assurance Handbook for Air Pollution Measurement Systems - Volume III were strictly followed during the test program, in addition to STACS' more stringent internal quality control standards.

Section 2.0 of this report provides a brief process description and a diagram of the sample point locations. Section 3.0 presents the test results. Section 4.0 outlines the procedures and test methods used and Section 5.0 discusses the quality assurance/quality control measures followed during sampling and analysis. Field data sheets, laboratory data, sample calculations, calibration data, process data, and a list of project participants are included in the Appendices to this report.

## **2.0 PROCESS DESCRIPTION AND SAMPLE POINT LOCATIONS**

### **2.1 SULFITE RECOVERY BOILER**

#### **2.1.1 PROCESS DESCRIPTION**

The Sulfite Recovery Boiler produces steam by the combustion of spent sulfite liquor (SSL). Emissions from the unit are controlled by venting the effluent gases through a Katzen wet scrubber followed by venting the effluent gases through a series of Brinks mist filters.

#### **2.1.2 REFERENCE METHOD SAMPLING LOCATION**

The reference method sampling port was located in the vicinity of the CEMs Probe in the exhaust ductwork from the unit. The ductwork is circular. Three sampling points were used for sampling the duct for each run and were located as described in PS2 Section 3.2 (40 CFR 60, Appendix B). The location is not required to meet EPA Method 1 criteria for the test methods used. A schematic diagram typical of the stack sampling location is included in Figure 2-2.

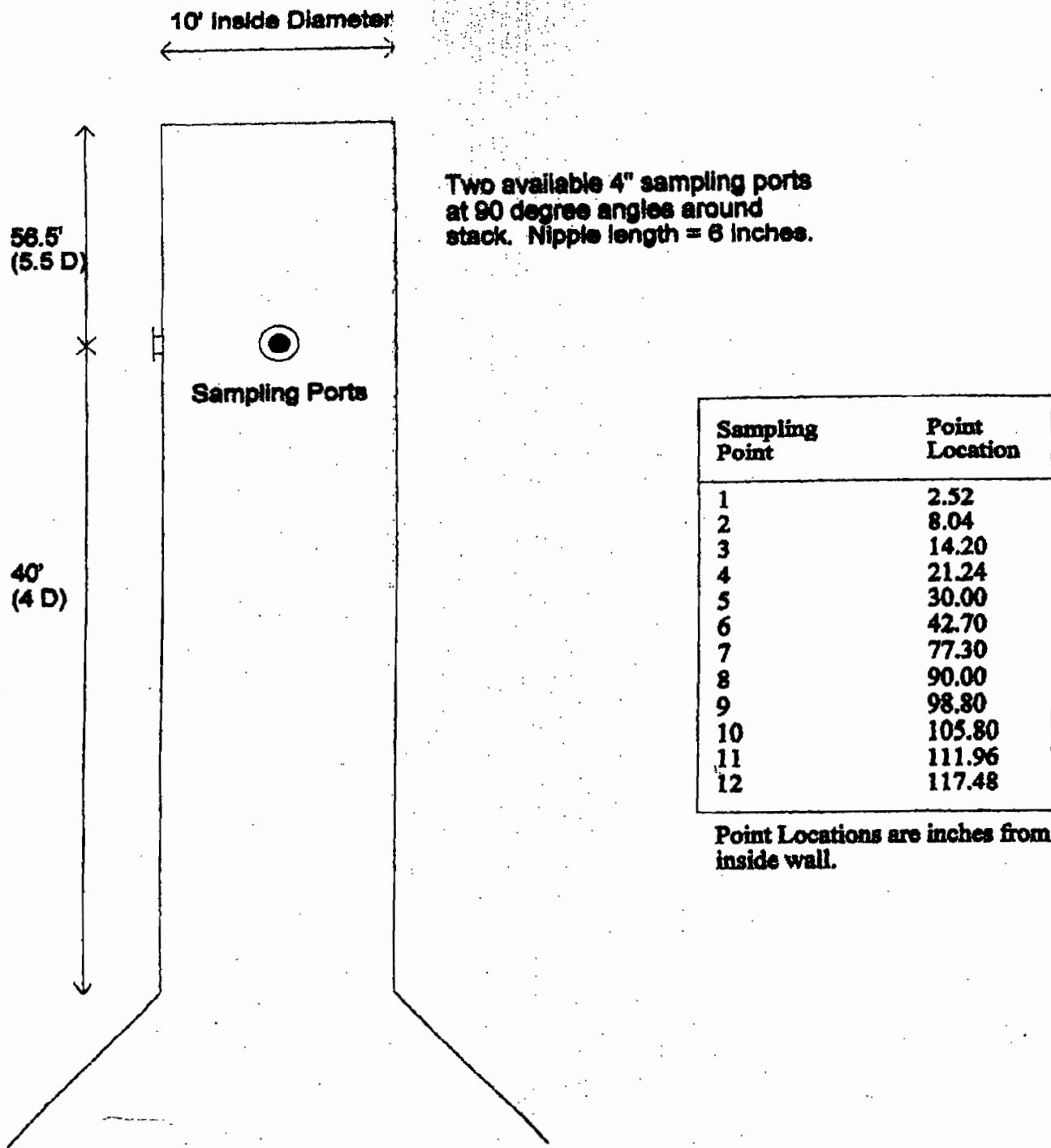
### **2.2 SCRUBBERS A & B**

#### **2.2.1 PROCESS DESCRIPTION AND SAMPLING LOCATION**

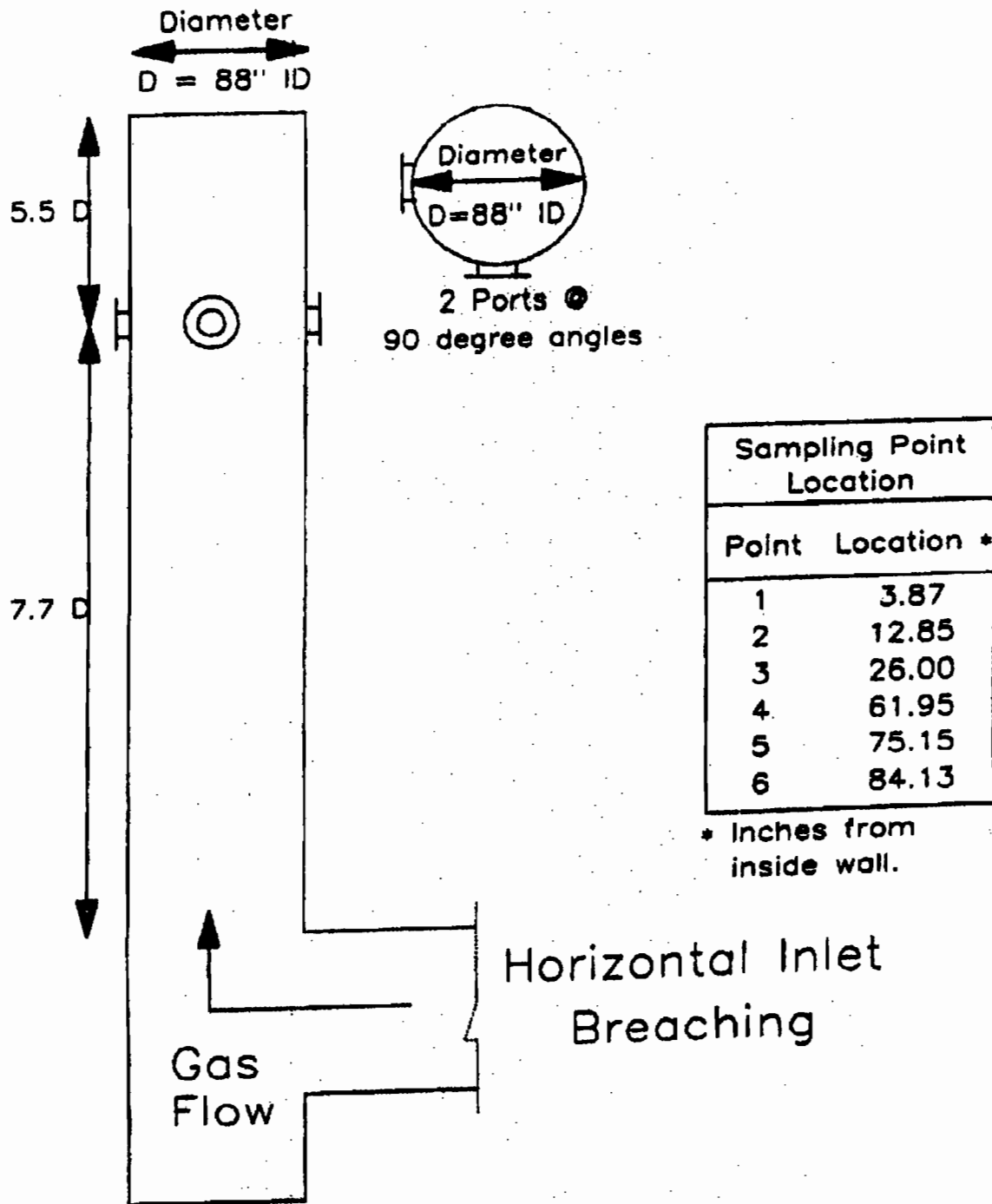
Gaseous and particulate matter emissions from scrubbers A & B are controlled by venturi type scrubbers with entrained water demisters downstream of the venturi. The scrubber stack is 10' in inside diameter and was sampled through two ports 90° apart around the circumference of the stack. The nearest downstream disturbance from the sampling location was the atmospheric exhaust which was located one duct diameter away from the test ports. The nearest upstream disturbance was the top of the scrubber which was four diameters away from the ports. Three sampling points were used for



sampling the duct for each run and were located as described in PS2 Section 3.2 (40 CFR 60, Appendix B). A schematic diagram typical of the stack sampling location is included in Figure 2-1.



**Figure 2-1. A & B Scrubber Stack Schematic Diagram**



**Figure 2-2. Sulfitite Recovery Boiler Stack Schematic Diagram**

### **3.0 EMISSION TEST RESULTS**

Testing for gaseous emissions was conducted for the Rayonier's Sulfite Recovery Boiler on May 25, 2004. Gaseous tests for Scrubbers B & A were conducted on June 9<sup>th</sup> and 10<sup>th</sup> respectively. SO<sub>2</sub>, NO<sub>x</sub> and CO emissions are presented as parts per million volume on a dry basis (ppmV, d). Oxygen (O<sub>2</sub>) is presented on a percent by volume dry basis. The raw reference data collected during the tests is included in Appendix A. Calibration and cylinder certificate are found in Appendix B.

Three points were traversed for the reference method sampling during each test. Three one hour test runs were conducted using the procedures outlined in EPA Methods 3A, 6C, 7E and 10. The sampling occurred while the units were at prescribed testing conditions for each test-run.

#### **3.1 SULFITE RECOVERY BOILER TEST RESULTS**

The gaseous emission testing for the sulfite recovery boiler occurred on May 25, 2004. Testing was concurrent with the particulate testing and the SO<sub>2</sub> RATA tests. The boiler process data will therefore be the same as that data presented for the particulate and RATA tests. The results of the gaseous emissions tests are presented in table 3-1. Table 3-4 presents the bias and drift calculations for each unit tested.

#### **3.2 SCRUBBER A & B TEST RESULTS**

The gaseous emission testing for scrubber B occurred on June 9, 2004. Testing was concurrent with the particulate testing. The boiler process data will therefore be the same as that data presented for the particulate. The results of the gaseous emissions tests are presented in table 3-2. Table 3-4 presents the bias and drift calculations for each unit tested. The gaseous emission testing for scrubber A occurred on June 10, 2004. Testing was concurrent with the particulate testing. The results of the gaseous emissions tests are

presented in table 3-3. Table 3-4 presents the bias and drift calculations for each unit tested.

**TABLE 3-1**  
**RAYNIER**  
**Sulfite Recovery Boiler**  
**Gaseous Emission Results**

<b>Sulfite Recovery Boiler</b>				
Date	5/25/04	5/25/04	5/25/04	
Start	9:16	11:11	13:05	
Stop	10:35	12:29	14:21	
Run	1	2	3	AVERAGE
Parameter				
O2 (%V,dry)	4.2	3.9	3.9	4.0
NOX (ppmV,dry)	595.5	615.8	604.1	605.1
SO2 (ppmV,dry)	195.8	207.8	219.9	207.8
CO (ppmV,dry)	1.3	1.1	3.2	1.9

**TABLE 3-2**  
**RAYNIER**  
**Scrubber B**  
**Gaseous Emission Results**

<b>Scrubber B</b>				
Date	6/9/04	6/9/04	6/9/04	
Start	12:27	15:00	17:51	
Stop	13:56	16:39	18:51	
Run				AVERAGE
Parameter	1	2	3	
O2 (%V,dry)	11.5	12.4	12.4	12.1
NOX (ppmV,dry)	53.8	62.1	63.7	59.8
SO2 (ppmV,dry)	0.8	0.3	0.4	0.5
CO (ppmV,dry)	133.3	115.8	150.6	133.2

**TABLE 3-3**  
**RAYNIER**  
**Scrubber A**  
**Gaseous Emission Results**

<b>Scrubber A</b>				
Date	6/10/04	6/10/04	6/10/04	
Start	12:00	14:41	17:34	
Stop	13:00	15:41	18:34	
Run				AVERAGE
Parameter	1	2	3	
O2 (%V,dry)	11.4	12.3	11.8	11.8
NOX (ppmV,dry)	79.7	86.3	79.4	81.8
SO2 (ppmV,dry)	3.7	4.1	3.7	3.8
CO (ppmV,dry)	255.7	175.7	248.6	226.7

**TABLE 3-4**  
**RAYNIER**  
**Bias/Drift Correction Calculation Spreadsheet**

	Sulfide Recovery Boiler				Scrubber B				Scrubber A			
	Date	5/25/04	5/25/04	5/25/04	Date	6/9/04	6/9/04	6/9/04	Date	6/10/04	6/10/04	6/10/04
	Start	9:16	11:11	13:05	Start	12:27	15:00	17:51	Start	12:00	14:41	17:34
Stop	10:35	12:29	14:21	Stop	13:56	16:39	18:51	Stop	13:00	15:41	18:34	
<b>REFERENCE METHOD</b>												
<b>BIAS ADJUSTED VALUES</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>
O2 (%V,dry)	#N/A	4.2	3.9	3.9	#N/A	11.5	12.4	12.4	#N/A	11.4	12.3	11.8
NOX (ppmV,dry)	#N/A	595.5	615.8	604.1	#N/A	53.8	62.1	63.7	#N/A	79.7	86.4	79.4
SO2 (ppmV,dry)	#N/A	195.8	207.8	219.9	#N/A	0.8	0.3	0.4	#N/A	3.7	4.1	3.7
CO (ppmV,dry)	#N/A	1.3	1.1	3.2	#N/A	133.3	115.8	150.6	#N/A	255.7	175.7	248.6
<b>RAW AVERAGES</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>
O2 (%V,dry)	#N/A	4.20	3.90	3.90	#N/A	11.58	12.41	12.37	#N/A	11.40	12.28	11.92
NOX (ppmV,dry)	#N/A	595.3	615.9	604.6	#N/A	53.8	62.8	63.7	#N/A	79.7	86.4	79.4
SO2(ppmV,dry)	#N/A	196.6	209.1	221.1	#N/A	0.9	0.5	0.6	#N/A	4.0	4.4	4.1
CO(ppmV)	#N/A	0.9	0.6	2.7	#N/A	136.6	118.3	153.2	#N/A	262.7	180.0	253.8
<b>ZERO BIAS</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>
O2 (%V,dry)	0.04	-0.05	-0.02	-0.06	0.20	0.20	0.07	0.1	0.06	0.07	0.10	0.2
NOX (ppmV,dry)	-0.6	0.2	0.0	0.9	0.0	-1.0	-1.0	-1.0	-1.0	-1.0	-1.0	-1.0
SO2(ppmV,dry)	0.6	1.0	1.6	0.7	0.1	0.2	0.2	0.1	0.5	0.2	0.5	0.5
CO(ppmV)	-0.4	-0.4	-0.6	-0.5	0.0	0.0	0.1	0.5	0.0	1.6	0.1	1.1
<b>BIAS CHECKS</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>
O2 (%V,dry)	12.99	12.95	12.97	12.94	13.00	12.99	12.99	13.0	13.05	12.97	12.96	13.1
NOX (ppmV,dry)	902.0	899.0	900.5	897.0	95.2	95.7	96.5	94.6	94.7	95.7	94.7	95.7
SO2(ppmV,dry)	250.0	249.4	247.3	247.3	24.7	24.7	25.1	25.4	24.8	24.9	24.9	24.9
CO(ppmV)	14.4	15.3	15.3	15.3	314.0	313.0	312.0	310.0	315.0	313.4	312.3	312.2
<b>BIAS VALUES</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>PRELIM</b>	<b>1</b>	<b>2</b>	<b>3</b>
O2 (%V,dry)	12.98	12.98	12.98	12.98	12.98	12.98	12.98	12.98	12.98	12.98	12.98	12.98
NOX (ppmV,dry)	907.0	907.0	907.0	907.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0
SO2(ppmV,dry)	248.0	248.0	248.0	248.0	24.9	24.9	24.9	24.9	24.9	24.9	24.9	24.9
CO(ppmV)	15.6	15.6	15.6	15.6	306.0	306.0	306.0	306.0	306.0	306.0	306.0	306.0
<b>ZERO Drift/Bias (% of scale)</b>	<b>SCALE</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>SCALE</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>SCALE</b>	<b>1</b>	<b>2</b>	<b>3</b>
O2 (%V,dry)	25	-0.36%	0.12%	-0.16%	25	0.00%	-0.52%	-0.08%	25	0.04%	0.12%	0.40%
NOX (ppmV,dry)	1000	0.08%	-0.02%	0.08%	100	-1.03%	0.00%	0.00%	100	0.00%	0.00%	0.00%
SO2(ppmV,dry)	500	0.08%	0.12%	-0.18%	50	0.20%	0.00%	-0.20%	50	-0.50%	0.50%	-0.06%
CO(ppmV)	100	0.00%	-0.15%	0.05%	1000	0.00%	0.01%	0.04%	1000	0.16%	-0.15%	0.10%
<b>UPSCALE Drift/Bias (% of scale)</b>	<b>SCALE</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>SCALE</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>SCALE</b>	<b>1</b>	<b>2</b>	<b>3</b>
O2 (%V,dry)	25	-0.16%	0.08%	-0.12%	25	-0.04%	0.00%	-0.08%	25	-0.32%	-0.04%	0.72%
NOX (ppmV,dry)	1000	-0.30%	0.15%	-0.35%	100	0.50%	0.80%	-1.90%	100	1.00%	-1.00%	1.00%
SO2(ppmV,dry)	500	-0.12%	-0.42%	0.00%	50	0.00%	0.80%	0.60%	50	0.20%	0.00%	0.00%
CO(ppmV)	100	0.90%	0.00%	0.00%	1000	-0.10%	-0.10%	-0.20%	1000	-0.16%	-0.11%	-0.01%

Reference: Source Testing And Consulting Services, Inc - June 2004

## 4.0 FIELD AND ANALYTICAL PROCEDURES

### 4.1 INSTRUMENTAL REFERENCE METHODS

Stack gas emissions of oxides of nitrogen (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>) and carbon monoxide (CO) are measured using continuous instrumental techniques. Diluent oxygen concentration is also measured using continuous instrumental techniques. These tests are performed in accordance with EPA Methods 3A for oxygen, 10 for CO, 6C for SO<sub>2</sub> and 7E for NO<sub>x</sub> as outlined in Title 40, Part 60, Appendix A of the Code of Federal Regulations. Copies of all on-line instrumental reference method data collected during the testing are included in the Appendices to this report. Calibration records are also given with the data.

Flue gas sample is withdrawn from the stack at a constant rate via a heated stainless steel sample probe. The sample probe is equipped with an additional stainless steel line to enable probe tip calibrations. The probe is of sufficient length to allow traversing across the duct as required by the performance specifications and the applicable test methods. Extracted sample is passed from the probe through a filter and a heated teflon sample line to the moisture removal system. The moisture removal system (gas conditioner) is designed for minimal contact between condensate and sample gas in order to prevent any reaction between the moisture and the measured pollutants. All components of the sampling and gas conditioning system are fabricated from borosilicate glass, teflon, or stainless steel. The gas conditioning system consists of a continuously downward teflon condenser coil (to prevent bubbling) and two glass knockout condenser traps. Moisture is continuously removed from the traps by an external peristaltic pump. The gas conditioning system is cooled in an ice water bath to facilitate complete moisture removal. Dry gas sample from the gas conditioner is transported to the instrument



enclosure via an unheated 1/4-inch O.D. teflon tube to a teflon-lined diaphragm pump, which delivers positive pressure sample to the instrument system. Flow control valves are used to deliver the gas sample at a regulated positive pressure to the reference method analytical instruments through a teflon and stainless steel manifold delivery network.

Flow and pressure to all monitors is held constant by monitoring sample and bypass rotameters. A diagram of the instrumental reference method sampling and analysis system used for the test program is given in Figure 4-1.

The sampling system is leak checked by passing known calibration gas standards up through a calibration line to the end of the probe. The gas standards are then pulled back through the sampling probe at stack pressure and subsequently through the entire sampling system to the instrument system. An oxygen analyzer response of less than or equal to 0.5% V to a zero oxygen standard is considered an acceptable leak check.

Analyzer calibration error is calculated by the difference between the known calibration gas concentration and the concentration exhibited by the analyzer. Bias checks are performed by comparing calibration responses through the entire sampling system to those exhibited at the analyzer. EPA Protocol #1, NIST traceable standard calibration gases are used to calibrate the analyzers.

Acceptable system performance checks do not exceed +/-2% calibration error, +/-5% system bias check, +/-3% zero drift, and +/- 3% upscale span drift.

Instrument response time is found by alternating zero nitrogen and upscale span gases through the bias check line and recording the upscale and down scale time. The response time of the CEM sampling system is performed to determine the length of time for the CEMs to respond to changes in the stack gas exhaust stream. Known, Protocol 1

reference gases and zero nitrogen are passed through the heated sample line, sample conditioning system and the manifold delivery network to the continuous emission monitors.

#### **4.2 DATA ACQUISITION**

The STACS data acquisition system (DAS) for the CEM analyzers consists of a Microlink 751 USB Data Interface and a proprietary STACS Data Acquisition program. The data are stored on disk as well as on a printed hard copy for each run. The system has 16-bit analog to digital conversion resolution (1 in 64,000) and a scan rate of approximately 1200 readings per minute. Data is averaged and reported by the DAS on a 30 second basis. The averaging time may be changed if desired. The system is capable of displaying the on line results in measured units and corrected to 15% O<sub>2</sub> as well as in lb/MMBtu. Averages are generated immediately at the end of each test run.

#### **4.3 REFERENCE METHOD ANALYZER PRINCIPLES OF OPERATION**

##### **4.3.1 METHOD 3A: OXYGEN ANALYSIS**

Flue gas sample is continuously analyzed for oxygen by a Servomex Model 1400A paramagnetic instrument. The Servomex 1400A analyzer uses electron paramagnetic resonance to detect the presence of oxygen molecules. Unlike most substances, oxygen has a triplet electron ground state, which leaves one electron unpaired, making it a paramagnetic molecule. This electron may have one of two quantum spin states ( $m_s = +/- 2$ ). By applying an alternating electromagnetic field of the proper frequency, the Servomex 1400A O<sub>2</sub> analyzer induces resonance between the two spin quantum states. In effect, the O<sub>2</sub> analyzer measures the electromagnetic energy absorbed by O<sub>2</sub> molecules at the resonant frequency.

##### **4.3.2 METHOD 7E: OXIDES OF NITROGEN ANALYSIS**

A Thermo Electron Model 10S instrument is used to analyze  $\text{NO}_x$ . The principle of operation of this instrument is a chemiluminescent reaction in which ozone ( $\text{O}_3$ ) reacts with nitric oxide ( $\text{NO}$ ) to form oxygen ( $\text{O}_2$ ) and nitrogen dioxide ( $\text{NO}_2$ ). During this reaction, a photon with a specific ultraviolet wavelength is emitted which is detected by a photomultiplier tube. The instrument is capable of analyzing total oxides of nitrogen ( $\text{NO} + \text{NO}_2$ ) by thermally converting  $\text{NO}_2$  to  $\text{NO}$  in a separate reaction chamber prior to the photomultiplier tube, if desired. The analyzer is operated in the  $\text{NO}_x$  mode during sampling.

A converter efficiency test is performed on the Thermoelectron Model 10S before the test series. During this procedure, a leak-free Tedlar bag is partially filled with a Protocol 1  $\text{NO}_x$  reference gas. The Tedlar bag is then filled to capacity with a Certified Oxygen reference gas standard. The contents are well mixed and immediately connected to the sample inlet of the analyzer. The Tedlar bag is analyzed by the analyzer in the " $\text{NO}_x$ " mode for at least thirty minutes. As the oxygen is exposed to the  $\text{NO}$  in the bag, the  $\text{NO}$  begins to react to form  $\text{NO}_2$ . A decrease in response in the  $\text{NO}_x$  mode of more than 2% absolute indicates that corrective action is required.

#### **4.3.3 METHOD 10: CARBON MONOXIDE ANALYSIS**

A TECO 48 Gas Filter Correlation Non-Dispersive Infrared (GFC/NDIR) analyzer was used for continuous  $\text{CO}$  analysis. The principle of operation of this analyzer is similar to traditional NDIR analyzers in that it relies on selective absorption; whereby, particular bandwidths of infrared energy are absorbed by a species based on its molecular orbital structure. Gas filter correlation NDIR differs from NDIR in the detection mechanism and because the GFC/NDIR does not require a reference cell. Infrared radiation passes through a rotating filter, through the sample cell and to the detector. The chopper wheel of the GFC/NDIR is a rotating disk separated into two chambers where one half is filled with nitrogen and the other half is filled with pure  $\text{CO}$ . These partitions act as alternating

gas filters for the incident IR radiation from the IR source. The CO gas filter side acts to produce a signal that cannot be further attenuated by CO in the sample cell and is used as a reference signal. The nitrogen filter allows all incident radiation to pass. Carbon monoxide in the sample cell attenuates the signal proportionally to concentration. This is considered the measure cycle. Any other gases that absorb infrared radiation are absorbed equally during both the measure and reference cycles, providing a real-time reference and minimal interferences. The detector for this analyzer is a lead-selenium photo detector.

It should be noted that EPA Method 10 prescribes the use of an ascarite trap to absorb carbon dioxide and excess moisture prior to introduction of the sample gas into the analyzer. The ascarite trap is prescribed since older technology dual cell NDIR carbon monoxide analyzers were subject to positive biases from carbon dioxide and water vapor. The single cell, gas filter correlation technology of the Teco Model 48, however, virtually eliminates this phenomenon since the sample gas itself is used as an optical attenuator during the reference cycle. Therefore, the ascarite traps were not used for this test effort.

#### **4.3.4 METHOD 6C: SULFUR DIOXIDE ANALYSIS**

A Western AT2 SO<sub>2</sub> ultraviolet analyzer is used for continuous SO<sub>2</sub> analysis. The principle of operation of this analyzer is to determine continuously the concentration of SO<sub>2</sub> in a flowing gaseous mixture. The ultraviolet source emits a pulsed beam of light. The sample gas is introduced to the cell, and the component of interest absorbs ultraviolet energy in proportion to the concentration in the gas. The difference between the reference cell containing nitrogen and sample cell is amplified by two detectors and then linearized for a constant voltage output correlating to the SO<sub>2</sub> absorption.

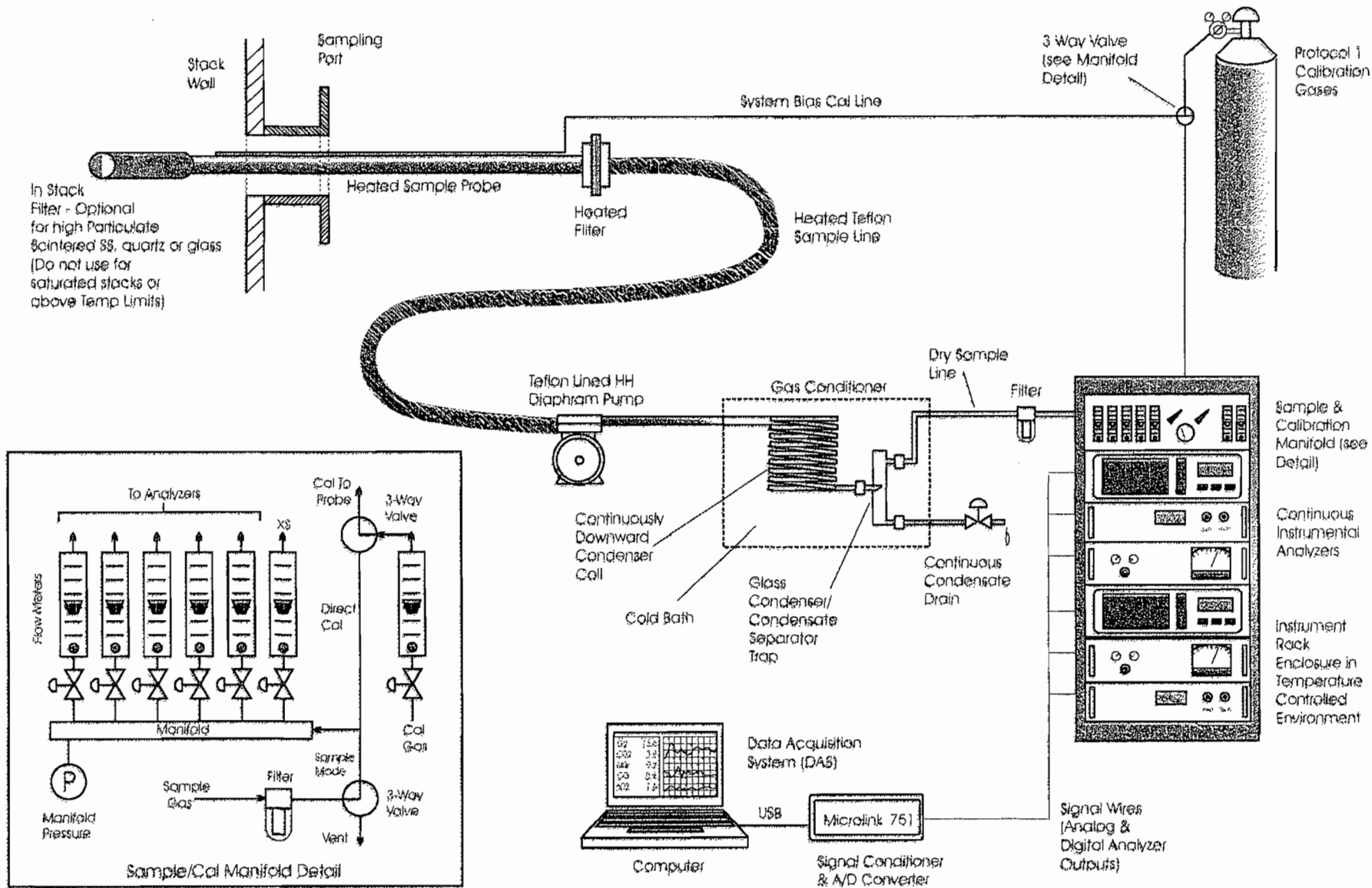


Figure 4-1. Schematic Diagram of STACS Instrumental Reference Method System

**5.0 QUALITY ASSURANCE/QUALITY CONTROL**

## 5.0 QUALITY ASSURANCE/QUALITY CONTROL

Strict Quality Assurance/Quality Control (QA/QC) measures were observed for all sampling and analysis performed for the Rayonier test program. The STACS QA/QC program is designed to provide the highest quality data in terms of the accuracy and precision of the measurements as well as the representativeness and comparability of the results.

Accuracy is the degree to which a measurement agrees to the true value or to an accepted reference value. Precision is the degree of reproducibility (or agreement) of a set of individual measurements of an identical property.

The objective of the overall QA/QC program is to provide guidelines in terms of accuracy and precision, which can be used to assess the uncertainty in the results and to substantiate the data in terms of the use of, accepted procedures. Quality Control can be defined as the use of operational techniques and activities that sustain good quality data. Adherence to accepted sampling and analytical methods and procedures (and specifically noting any aberrations or exceptions to these procedures) is an example of quality control. Quality Assurance includes all those planned and systematic activities necessary to ensure that the accuracy and precision of the results meets the needs of the testing program.

The QA program includes the activities planned by routine operators and analysts to provide an assessment of test data precision (and accuracy). Examples of implementation of QA measures include routine calibration checks to assess the bias and drift of an analyzer after each test run. The measurement system bias is an indicator of the accuracy of the system and the drift is an indication of the precision of the measurements.

The quality assurance/quality control measures for sampling and analysis included in the following documents were strictly followed during the emissions test program, except as noted below and elsewhere in this document. The procedures are incorporated by reference into the quality assurance program for this effort as they apply to the collection, analysis, and calculation of pollutant concentrations and mass emission rates from the combustion turbines:

The Code of Federal Regulations, Title 40, Part 60, Appendix A., EPA Methods 1, 2, 3A, 4, 5,6C, 7E, 10.

The Quality Assurance Handbook for Air Pollution Measurement Systems - Volume III - Stationary Source Specific Methods (EPA-600/4-77-027b) Sections 3.0-3.4.

The following sections provide a brief synopsis of the internal QA program that is used for this test program. Quality assurance documentation is included in Appendix C.

#### **5.1 CALIBRATIONS AND DRIFT ASSESSMENTS**

At the beginning of each test day, the EPA Reference Method 6C, 7E, 10 and 3A test equipment is calibrated, and adjusted as required, on a two-point basis. EPA Protocol #1, NIST traceable standard calibration gases are used to calibrate the analyzers.

Subsequently, additional calibration standards are introduced to the analyzers to check the linearity of the instrument response. If the linearity of the instrument is within +/-2% of full scale of the calibration standard value, the calibration is accepted. Otherwise, corrective maintenance is performed, and the instrument is re-calibrated. During this time, bias checks are also performed by introducing calibration standards directly to the instrument manifold and through the entire sampling system and comparing the results.



Calibration checks are performed through the entire sampling system at the conclusion of each test run to determine calibration drift and any change in sample system bias. EPA Methods 3A, 6C and 7E require a bias/drift correction to be applied to the test data for each run based on pre-test and post-test bias and drift calibration checks, all data was bias/drift corrected for this program for consistency and in the interest of obtaining the highest quality data. The equation used for the bias corrections is provided in EPA Method 6C (Equation 6C-1).

Sampling system bias is assessed by introducing a mid-range or high-range gas through the sampling system and back to the analyzers. The maximum allowable bias is 5% of the value the analyzer read for the same gas when introduced to the probe tip as a percent of the span of the analyzer. STACS' internal QA/QC program requires that corrective action be taken if the bias exceeds 2% of the span.

Sampling system drift checks are subsequently performed at the conclusion of each test run. Corrective actions are taken if the drift checks exceed 2% of span after any test run. All calibration gases were EPA Protocol 1, NIST traceable standards with a rated accuracy of +/- 1%. Calibration gas analysis certificates are included in the test report.

## **5.2 NO<sub>2</sub> CONVERTER EFFICIENCY**

Prior to the test series, an NO<sub>2</sub> to NO converter efficiency test is performed for the NO<sub>x</sub> analyzer as prescribed in EPA Method 7E and 20. The procedure used for testing the converter efficiency is given below:

- Fill a leak-free Tedlar bag approximately half full with an NO in N<sub>2</sub> blend.
- Fill the remainder of the bag with 0.1 UHP grade air.
- Immediately attach the NO/Air mixture to the inlet of the NO<sub>x</sub> monitor being used.
- Allow the monitor to sample the gas in the bag for 30 minutes.

As the O<sub>2</sub> and NO in the bag are exposed to each other a reaction occurs which changes the NO to NO<sub>2</sub>. An attenuation in response over time of greater than two percent absolute indicates that the converter efficiency is unacceptable. Two NO<sub>x</sub> analyzers were used for this test program

### **5.3 INSTRUMENT RESPONSE TIME**

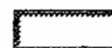
Maximum instrument system response time is determined by alternately passing zero and span gas through the entire sampling system and noting the time required for the monitors to achieve a change of 95% of the final concentrations. Both upscale and down scale response times are recorded. The supporting data sheets and DAS printouts are included in the test report.

### **5.4 LEAK CHECKS**

Since all calibration drift and bias are performed through the entire sampling system, leak-checks are incorporated before and after each run. The criterion used for this test is an oxygen response to a zero gas of less than 0.5% O<sub>2</sub>. Leak checks are also incorporated into the zero and span drift checks at the end of each run since the calibration gas is passed through the entire sampling system for each post test drift check. Acceptable bias checks are therefore also an indication that leakage is not occurring in the system. In addition, STACS conducts a vacuum leak check prior to initial sampling.

**APPENDIX A**  
**EMISSION DATA**

Source Testing And Consulting Services, Inc.



SRB

9-Jun-04

RAYNIER

0.00

Unit #

SRB

Parameter	O2	NOx	CO	SO2	NOx	CO	0.00	0.00	Comments
Units	%V	ppmV	ppmV	ppmV	@15%O2	@15%O2	0.00	0.00	
25-May-04 7:08:12	-0.03	-1.08	0.00	1.48	-0.30	0.00			ce zero
25-May-04 7:08:17	-0.02	-1.08	-0.20	1.48	-0.31	-0.06			ce zero
25-May-04 7:08:22	-0.04	-1.08	-0.20	1.48	-0.30	-0.06			ce zero
25-May-04 7:08:27	-0.02	-1.18	-0.20	1.48	-0.33	-0.06			ce zero
25-May-04 7:08:32	-0.04	-1.18	-0.20	1.48	-0.33	-0.06			ce zero
25-May-04 7:08:37	-0.02	-1.18	-0.20	1.48	-0.33	-0.06			ce zero
25-May-04 7:08:42	-0.04	-1.08	0.00	1.84	-0.30	0.00			ce zero
25-May-04 7:08:47	-0.03	-1.08	-0.20	1.11	-0.30	-0.06			ce zero
25-May-04 7:10:07	19.95	-1.18	-0.20	1.48	-7.31	-1.22			CE O2=19.98
25-May-04 7:10:12	19.96	-1.18	-0.39	1.48	-7.42	-2.47			CE O2=19.98
25-May-04 7:10:17	19.95	-1.08	-0.20	1.11	-6.75	-1.23			CE O2=19.98
25-May-04 7:10:22	19.97	-1.18	-0.20	1.84	-7.46	-1.24			CE O2=19.98
25-May-04 7:10:27	19.96	-1.08	-0.20	1.84	-6.82	-1.24			CE O2=19.98
25-May-04 7:10:32	19.97	-1.18	0.00	1.11	-7.50	0.00			CE O2=19.98
25-May-04 7:10:37	19.96	-1.08	-0.20	1.48	-6.82	-1.24			CE O2=19.98
25-May-04 7:10:42	19.97	-1.08	-0.20	1.11	-6.88	-1.25			CE O2=19.98
25-May-04 7:10:47	19.97	-1.08	0.00	1.48	-6.84	0.00			CE O2=19.98
25-May-04 7:10:52	19.98	-1.18	0.00	1.11	-7.56	0.00			CE O2=19.98
25-May-04 7:11:07	19.98	-1.28	0.00	1.48	-8.21	0.00			LB
25-May-04 7:11:12	19.98	-1.18	-0.20	1.48	-7.56	-1.26			LB
25-May-04 7:11:17	19.97	-1.08	-0.20	1.48	-6.89	-1.25			LB
25-May-04 7:11:22	19.98	-1.18	-0.20	1.48	-7.60	-1.27			LB
25-May-04 7:11:27	19.97	-1.08	-0.20	1.48	-6.84	-1.24			LB
25-May-04 7:11:32	19.98	-1.18	-0.20	1.48	-7.58	-1.26			LB
25-May-04 7:11:37	19.97	-1.18	-0.20	1.11	-7.52	-1.25			LB
25-May-04 7:11:42	19.99	-1.18	-0.20	1.11	-7.64	-1.27			LB
25-May-04 7:11:47	19.98	-1.18	-0.20	1.48	-7.56	-1.26			LB
25-May-04 7:11:52	19.98	-1.08	-0.20	1.48	-6.91	-1.26			LB
25-May-04 7:13:01	13.00	-1.18	0.59	1.84	-0.88	0.44			CE O2=12.98
25-May-04 7:13:06	12.99	-1.18	-0.20	1.48	-0.88	-0.15			CE O2=12.98
25-May-04 7:13:11	12.99	-1.08	0.00	1.48	-0.81	0.00			CE O2=12.98
25-May-04 7:13:16	12.99	-1.08	-0.20	1.48	-0.81	-0.15			CE O2=12.98
25-May-04 7:13:21	13.00	-1.18	-0.20	1.11	-0.88	-0.15			CE O2=12.98
25-May-04 7:13:26	12.98	-1.08	-0.20	1.84	-0.81	-0.15			CE O2=12.98
25-May-04 7:13:31	12.99	-1.08	0.00	1.84	-0.81	0.00			CE O2=12.98
25-May-04 7:13:36	12.98	-1.18	-0.20	1.48	-0.88	-0.15			CE O2=12.98
25-May-04 7:13:41	13.00	-1.08	-0.20	1.11	-0.81	-0.15			CE O2=12.98
25-May-04 7:13:46	12.99	-1.18	0.00	1.11	-0.88	0.00			CE O2=12.98
25-May-04 7:13:51	13.00	-1.18	-0.20	1.48	-0.88	-0.15			CE O2=12.98
25-May-04 7:14:02	12.99	-0.98	0.00	1.11	-0.73	0.00			LB
25-May-04 7:14:07	12.99	-1.18	-0.20	1.48	-0.88	-0.15			LB
25-May-04 7:14:12	12.99	-1.08	0.00	1.84	-0.81	0.00			LB
25-May-04 7:14:17	12.99	-1.08	-0.20	1.11	-0.81	-0.15			LB
25-May-04 7:14:22	12.99	-1.08	-0.20	1.11	-0.81	-0.15			LB
25-May-04 7:14:27	12.98	-1.18	0.00	1.48	-0.88	0.00			LB
25-May-04 7:14:32	12.99	-1.08	-0.20	1.84	-0.81	-0.15			LB
25-May-04 7:14:37	12.99	-1.08	-0.20	1.48	-0.81	-0.15			LB
25-May-04 7:14:42	12.99	-1.08	-0.20	1.84	-0.81	-0.15			LB
25-May-04 7:17:10	0.02	904.16	907.01	1.48	255.50	256.30			CE NX=907 CO=904
25-May-04 7:17:15	0.02	902.68	919.01	1.18	255.08	259.69			CE NX=907 CO=904
25-May-04 7:17:20	0.01	902.09	919.01	1.48	254.73	259.51			CE NX=907 CO=904
25-May-04 7:17:25	0.02	901.50	918.02	1.48	254.78	259.44			CE NX=907 CO=904
25-May-04 7:17:30	0.01	901.99	918.02	1.18	254.79	259.32			CE NX=907 CO=904
25-May-04 7:17:35	0.02	901.01	911.34	1.18	254.58	257.49			CE NX=907 CO=904
25-May-04 7:17:40	0.02	900.91	908.98	1.48	254.58	256.86			CE NX=907 CO=904
25-May-04 7:17:45	0.02	900.81	919.01	1.48	254.55	259.69			CE NX=907 CO=904

Source Testing And Consulting Services, Inc.



SRB

9-Jun-04	RAYNIER	0.00						Unit #	SRB		
Parameter	O2	NOx	CO	SO2	NOx	CO	0.00	0.00	0.00	0.00	Comments
Units	%V	ppmV	ppmV	ppmV	@15%O2	@15%O2					
25-May-04	7:17:50	0.02	899.73	918.81	1.18	254.27	259.67				CE NX=907 CO=904
25-May-04	7:17:55	0.01	904.16	925.10	1.77	255.35	261.26				CE NX=907 CO=904
25-May-04	7:18:00	0.02	904.06	925.10	1.48	255.41	261.35				CE NX=907 CO=904
25-May-04	7:18:05	0.01	903.57	916.06	1.48	255.21	258.74				CE NX=907 CO=904
25-May-04	7:18:10	0.02	902.68	915.86	1.48	255.05	258.77				CE NX=907 CO=904
25-May-04	7:18:21	0.02	902.78	913.11	1.48	255.14	258.05				LB
25-May-04	7:18:26	0.01	903.07	923.14	1.48	255.10	260.77				LB
25-May-04	7:18:31	0.01	902.48	922.94	1.48	254.93	260.71				LB
25-May-04	7:18:36	0.02	902.48	922.94	1.48	254.96	260.74				LB
25-May-04	7:18:41	0.01	902.48	923.14	1.48	254.87	260.71				LB
25-May-04	7:18:46	0.01	901.89	910.94	1.48	254.77	257.32				LB
25-May-04	7:18:51	0.01	901.80	910.94	1.18	254.74	257.32				LB
25-May-04	7:18:56	0.01	901.70	909.17	1.48	254.68	256.79				LB
25-May-04	7:20:37	0.00	455.37	618.05	1.48	128.53	174.44				CE NX=456 CO=619
25-May-04	7:20:42	-0.01	455.67	618.05	1.48	128.60	174.42				CE NX=456 CO=619
25-May-04	7:20:47	-0.02	455.37	617.26	0.89	128.44	174.10				CE NX=456 CO=619
25-May-04	7:20:52	-0.01	455.37	617.06	1.18	128.47	174.08				CE NX=456 CO=619
25-May-04	7:20:57	-0.02	454.98	618.05	1.18	128.31	174.30				CE NX=456 CO=619
25-May-04	7:21:02	-0.02	455.37	618.05	1.18	128.45	174.34				CE NX=456 CO=619
25-May-04	7:21:07	-0.02	455.16	620.61	1.03	128.35	175.01				CE NX=456 CO=619
25-May-04	7:21:12	-0.02	454.96	620.61	1.03	128.31	175.03				CE NX=456 CO=619
25-May-04	7:21:17	-0.02	455.06	617.66	0.44	128.33	174.18				CE NX=456 CO=619
25-May-04	7:21:22	-0.01	455.06	617.66	0.74	128.37	174.24				CE NX=456 CO=619
25-May-04	7:21:27	-0.01	455.65	619.63	0.74	128.55	174.82				CE NX=456 CO=619
25-May-04	7:21:32	-0.02	455.35	619.63	0.74	128.44	174.77				CE NX=456 CO=619
25-May-04	7:21:42	-0.01	454.96	612.35	1.03	128.39	172.80				LB
25-May-04	7:21:46	-0.02	454.86	619.63	1.03	128.27	174.73				LB
25-May-04	7:21:51	-0.01	454.96	619.63	0.74	128.36	174.82				LB
25-May-04	7:21:56	-0.02	455.26	616.88	1.03	128.40	173.98				LB
25-May-04	7:22:01	-0.02	455.35	616.68	0.44	128.39	173.88				LB
25-May-04	7:22:06	-0.02	455.06	616.68	0.44	128.36	173.94				LB
25-May-04	7:22:11	-0.02	455.06	616.88	0.74	128.34	173.98				LB
25-May-04	7:22:16	-0.02	454.96	619.63	0.74	128.31	174.75				LB
25-May-04	7:22:21	-0.02	455.16	619.83	0.74	128.35	174.79				LB
25-May-04	7:22:26	-0.02	455.16	621.60	0.44	128.38	175.33				LB
25-May-04	7:24:53	-0.04	0.15	-0.30	453.88	0.04	-0.08				CE SO2=452
25-May-04	7:24:58	-0.04	0.15	-0.30	453.58	0.04	-0.08				CE SO2=452
25-May-04	7:25:03	-0.04	0.05	-0.49	453.88	0.01	-0.14				CE SO2=452
25-May-04	7:25:08	-0.04	0.05	-0.30	454.17	0.01	-0.08				CE SO2=452
25-May-04	7:25:13	-0.04	0.15	-0.30	454.47	0.04	-0.08				CE SO2=452
25-May-04	7:25:18	-0.04	0.05	-0.30	454.47	0.01	-0.08				CE SO2=452
25-May-04	7:25:23	-0.04	-0.05	-0.49	454.17	-0.01	-0.14				CE SO2=452
25-May-04	7:25:28	-0.05	0.05	-0.30	453.88	0.01	-0.08				CE SO2=452
25-May-04	7:25:33	-0.03	0.05	-0.30	454.47	0.01	-0.08				CE SO2=452
25-May-04	7:25:42	-0.04	0.05	-0.49	454.47	0.01	-0.14				LB
25-May-04	7:25:47	-0.02	-0.05	-0.30	454.76	-0.01	-0.08				LB
25-May-04	7:25:52	-0.05	-0.05	-0.30	455.06	-0.01	-0.08				LB
25-May-04	7:25:57	-0.04	-0.05	-0.30	454.76	-0.01	-0.08				LB
25-May-04	7:26:02	-0.03	-0.05	-0.30	454.76	-0.01	-0.08				LB
25-May-04	7:26:07	-0.05	-0.15	-0.30	454.47	-0.04	-0.08				LB
25-May-04	7:26:12	-0.04	-0.05	-0.49	454.47	-0.01	-0.14				LB
25-May-04	7:26:17	-0.04	-0.05	-0.30	454.47	-0.01	-0.08				LB
25-May-04	7:26:22	-0.03	-0.15	-0.30	454.76	-0.04	-0.08				LB
25-May-04	7:26:27	-0.01	-0.15	-0.30	454.47	-0.04	-0.08				LB
25-May-04	7:26:32	-0.04	-0.25	-0.30	455.06	-0.07	-0.08				LB
25-May-04	7:26:37	-0.04	-0.15	-0.30	455.06	-0.04	-0.08				LB
25-May-04	7:26:42	-0.03	-0.25	-0.49	455.36	-0.07	-0.14				LB

Source Testing And Consulting Services, Inc.



SRB

9-Jun-04	RAYNIER	0.00						Unit #	SRB	0.00	0.00	Comments
Parameter	O2	NOx	CO	SO2	NOx	CO			0.00	0.00		
Units	%V	ppmV	ppmV	ppmV	@15%O2	@15%O2			0.00	0.00		
25-May-04	7:26:47	-0.04	-0.15	-0.30	455.06	-0.04	-0.08				LB	
25-May-04	7:26:52	-0.03	-0.15	-0.30	454.47	-0.04	-0.08				LB	
25-May-04	7:26:57	-0.04	-0.15	-0.30	454.76	-0.04	-0.08				LB	
25-May-04	7:27:02	-0.03	-0.25	-0.49	455.06	-0.07	-0.14				LB	
25-May-04	7:27:07	-0.04	-0.15	-0.49	455.06	-0.04	-0.14				LB	
25-May-04	7:27:12	-0.03	-0.25	-0.49	455.36	-0.07	-0.14				LB	
25-May-04	7:27:17	-0.04	-0.25	-0.30	454.76	-0.07	-0.08				LB	
25-May-04	7:27:22	-0.03	-0.34	-0.30	454.76	-0.10	-0.08				LB	
25-May-04	7:27:27	-0.03	-0.25	-0.49	455.06	-0.07	-0.14				LB	
25-May-04	7:27:32	-0.03	-0.25	-0.30	455.06	-0.07	-0.08				LB	
25-May-04	7:27:37	-0.05	-0.34	-0.30	455.36	-0.10	-0.08				LB	
25-May-04	7:27:42	-0.02	-0.25	-0.49	455.65	-0.07	-0.14				LB	
25-May-04	7:27:47	-0.05	-0.34	-0.49	455.36	-0.10	-0.14				LB	
25-May-04	7:27:52	-0.04	-0.25	-0.30	455.06	-0.07	-0.08				LB	
25-May-04	7:27:57	-0.04	-0.34	-0.30	455.06	-0.10	-0.08				LB	
25-May-04	7:28:02	-0.05	-0.25	-0.30	455.06	-0.07	-0.08				LB	
25-May-04	7:28:07	-0.03	-0.25	-0.30	454.76	-0.07	-0.08				LB	
25-May-04	7:28:12	-0.04	-0.34	-0.30	455.06	-0.10	-0.08				LB	
25-May-04	7:28:17	-0.04	-0.34	-0.49	455.36	-0.10	-0.14				LB	
25-May-04	7:28:22	-0.03	-0.34	-0.49	455.65	-0.10	-0.14				LB	
25-May-04	7:32:20	-0.04	-0.44	-0.30	250.32	-0.12	-0.08				CE SO2=248	
25-May-04	7:32:25	-0.04	-0.54	-0.49	250.32	-0.15	-0.14				CE SO2=248	
25-May-04	7:32:30	-0.05	-0.34	-0.30	250.03	-0.10	-0.08				CE SO2=248	
25-May-04	7:32:35	-0.04	-0.44	-0.30	250.03	-0.12	-0.08				CE SO2=248	
25-May-04	7:32:40	-0.05	-0.34	-0.30	250.32	-0.10	-0.08				CE SO2=248	
25-May-04	7:32:45	-0.04	-0.34	-0.30	250.32	-0.10	-0.08				CE SO2=248	
25-May-04	7:32:50	-0.05	-0.44	-0.49	250.32	-0.12	-0.14				CE SO2=248	
25-May-04	7:32:55	-0.04	-0.54	-0.49	250.32	-0.15	-0.14				CE SO2=248	
25-May-04	7:33:00	-0.04	-0.44	-0.30	250.62	-0.12	-0.08				CE SO2=248	
25-May-04	7:33:07	-0.04	-0.34	-0.30	250.32	-0.10	-0.08				LB	
25-May-04	7:33:12	-0.05	-0.44	-0.49	250.03	-0.12	-0.14				LB	
25-May-04	7:33:17	-0.03	-0.34	-0.30	250.03	-0.10	-0.08				LB	
25-May-04	7:33:22	-0.04	-0.34	-0.30	250.03	-0.10	-0.08				LB	
25-May-04	7:33:27	-0.04	-0.44	-0.30	250.03	-0.12	-0.08				LB	
25-May-04	7:33:32	-0.04	-0.34	-0.49	250.03	-0.10	-0.14				LB	
25-May-04	7:33:37	-0.04	-0.34	-0.49	250.03	-0.10	-0.14				LB	
25-May-04	7:33:42	-0.04	-0.44	-0.30	249.73	-0.12	-0.08				LB	
25-May-04	7:33:47	-0.05	-0.44	-0.49	250.03	-0.12	-0.14				LB	
25-May-04	7:33:52	-0.04	-0.44	-0.30	250.32	-0.12	-0.08				LB	
25-May-04	7:36:30	-0.04	9.69	14.46	2.21	2.73	4.07				CE CO=15.6	
25-May-04	7:36:35	-0.03	9.69	14.46	1.33	2.73	4.07				CE CO=15.6	
25-May-04	7:36:40	-0.05	9.78	14.46	1.62	2.76	4.07				CE CO=15.6	
25-May-04	7:36:45	-0.04	9.78	14.26	1.62	2.76	4.02				CE CO=15.6	
25-May-04	7:36:50	-0.04	9.59	14.46	1.62	2.70	4.07				CE CO=15.6	
25-May-04	7:36:55	-0.03	9.78	14.26	1.62	2.76	4.02				CE CO=15.6	
25-May-04	7:37:00	-0.04	9.59	14.46	1.62	2.70	4.07				CE CO=15.6	
25-May-04	7:37:05	-0.03	9.69	14.26	1.62	2.73	4.02				CE CO=15.6	
25-May-04	7:37:10	-0.03	9.69	14.46	1.62	2.73	4.07				CE CO=15.6	
25-May-04	7:37:19	-0.04	9.69	14.26	1.62	2.73	4.02				LB	
25-May-04	7:37:23	-0.04	9.69	14.46	1.62	2.73	4.07				LB	
25-May-04	7:37:28	-0.04	9.69	14.46	1.92	2.73	4.07				LB	
25-May-04	7:37:33	-0.05	9.88	14.46	1.62	2.78	4.07				LB	
25-May-04	7:37:38	-0.03	9.78	14.46	1.33	2.76	4.07				LB	
25-May-04	7:37:43	-0.03	9.78	14.26	0.74	2.76	4.02				LB	
25-May-04	7:37:48	-0.04	9.69	14.46	1.33	2.73	4.07				LB	
25-May-04	7:37:53	-0.04	9.69	14.46	1.33	2.73	4.07				LB	
25-May-04	7:37:58	-0.04	9.78	14.46	1.03	2.76	4.07				LB	

Source Testing And Consulting Services, Inc.



SRB

9-Jun-04	RAYNIER				0.00		Unit #	SRB		
	Parameter	O2	NOx	CO	SO2	NOx	CO	0.00	0.00	Comments
	Units	%V	ppmV	ppmV	ppmV	@15%O2	@15%O2	0.00	0.00	
25-May-04	7:38:03	-0.04	9.69	14.46	1.62	2.73	4.07			LB
25-May-04	7:38:08	-0.03	9.78	14.46	1.62	2.76	4.07			LB
25-May-04	7:38:13	-0.05	9.69	14.46	1.03	2.73	4.07			LB
25-May-04	7:38:18	-0.03	9.78	14.26	1.03	2.76	4.02			LB
25-May-04	7:39:46	-0.04	21.29	31.37	0.74	6.00	8.84			CE CO=31.7
25-May-04	7:39:51	-0.04	21.39	31.37	1.33	6.03	8.84			CE CO=31.7
25-May-04	7:39:56	-0.03	21.39	30.58	1.03	6.03	8.62			CE CO=31.7
25-May-04	7:40:01	-0.03	21.39	30.39	0.74	6.03	8.57			CE CO=31.7
25-May-04	7:40:06	-0.03	21.49	30.58	0.74	6.06	8.62			CE CO=31.7
25-May-04	7:40:11	-0.03	21.49	30.39	1.33	6.06	8.56			CE CO=31.7
25-May-04	7:40:16	-0.04	21.39	31.37	1.03	6.03	8.84			CE CO=31.7
25-May-04	7:40:21	-0.04	21.39	31.57	1.03	6.03	8.89			CE CO=31.7
25-May-04	7:40:26	-0.04	21.39	31.57	1.03	6.03	8.89			CE CO=31.7
25-May-04	7:40:37	-0.05	21.29	30.39	1.03	6.00	8.56			LB
25-May-04	7:40:42	-0.03	21.49	30.58	1.33	6.06	8.62			LB
25-May-04	7:40:47	-0.04	21.39	31.57	1.03	6.03	8.89			LB
25-May-04	7:40:52	-0.05	21.49	31.57	1.03	6.05	8.89			LB
25-May-04	7:40:57	-0.04	21.39	31.57	1.03	6.03	8.89			LB
25-May-04	7:42:36	-0.03	-1.18	61.17	0.89	-0.33	17.24			CE CO=61,7
25-May-04	7:42:41	-0.04	-1.18	61.37	0.89	-0.33	17.29			CE CO=61,7
25-May-04	7:42:46	-0.04	-1.18	61.17	0.89	-0.33	17.23			CE CO=61,7
25-May-04	7:42:51	-0.04	-1.18	61.17	0.89	-0.33	17.24			CE CO=61,7
25-May-04	7:42:56	-0.04	-1.18	61.37	0.59	-0.33	17.29			LB
25-May-04	7:43:01	-0.04	-1.18	61.37	0.59	-0.33	17.29			LB
25-May-04	7:43:06	-0.05	-1.28	61.17	0.59	-0.36	17.23			LB
25-May-04	7:43:11	-0.04	-1.18	61.17	0.89	-0.33	17.24			LB
25-May-04	7:46:59	-0.04	94.70	97.16	0.59	26.68	27.38			CE CO=96.8
25-May-04	7:47:04	-0.04	94.61	97.16	0.30	26.66	27.38			CE CO=96.8
25-May-04	7:47:09	-0.05	94.70	97.16	0.89	26.68	27.37			CE CO=96.8
25-May-04	7:47:14	-0.03	94.70	97.16	0.89	26.70	27.39			CE CO=96.8
25-May-04	7:47:19	-0.04	94.70	97.16	0.89	26.68	27.37			CE CO=96.8
25-May-04	7:47:24	-0.03	94.61	97.36	0.59	26.67	27.44			CE CO=96.8
25-May-04	7:47:29	-0.04	94.70	97.16	0.59	26.68	27.37			CE CO=96.8
25-May-04	7:47:34	-0.03	94.80	97.36	0.59	26.72	27.44			CE CO=96.8
25-May-04	7:47:39	-0.04	94.61	97.36	0.89	26.65	27.43			CE CO=96.8
25-May-04	7:47:44	-0.04	94.70	97.16	0.59	26.68	27.38			LB
25-May-04	7:47:49	-0.03	94.70	97.36	0.59	26.70	27.44			LB
25-May-04	7:47:54	-0.04	94.61	97.36	0.59	26.66	27.44			LB
25-May-04	7:47:59	-0.04	94.80	97.16	0.89	26.71	27.38			LB
25-May-04	7:48:04	-0.03	94.61	97.36	0.59	26.67	27.44			LB
25-May-04	7:48:09	-0.03	94.80	97.16	0.89	26.72	27.39			LB
25-May-04	7:48:14	-0.04	94.90	97.16	0.30	26.74	27.38			LB
25-May-04	7:51:02	-0.04	180.36	308.21	0.89	50.81	86.83			CE CO=308
25-May-04	7:51:07	-0.04	180.36	308.40	0.59	50.81	86.88			CE CO=308
25-May-04	7:51:12	-0.04	180.07	308.21	0.59	50.75	86.86			CE CO=308
25-May-04	7:51:17	-0.03	180.16	307.22	0.89	50.79	86.61			CE CO=308
25-May-04	7:51:23	-0.04	180.36	307.22	0.59	50.82	86.57			LB
25-May-04	7:51:28	-0.04	180.36	309.19	0.59	50.83	87.13			LB
25-May-04	7:51:33	-0.04	180.16	309.39	0.30	50.77	87.19			LB
25-May-04	7:51:38	-0.04	180.26	308.21	0.89	50.80	86.86			LB
25-May-04	7:51:43	-0.04	180.26	308.21	0.59	50.80	86.86			LB
25-May-04	9:16:39	4.16	588.78	0.39	190.29	207.54	0.14			SRB RA R1 I START
25-May-04	9:17:39	4.13	580.62	0.39	188.52	204.28	0.14			SRB RA R1 PM R1
25-May-04	9:18:39	4.11	582.78	0.39	190.00	204.74	0.14			SRB RA R1 PM R1
25-May-04	9:19:39	4.02	584.45	0.59	187.93	204.31	0.21			SRB RA R1 PM R1
25-May-04	9:20:39	4.05	587.50	0.39	190.29	205.76	0.14			SRB RA R1 PM R1
25-May-04	9:21:39	4.03	579.75	0.49	189.55	202.75	0.17			SRB RA R1 PM R1

Source Testing And Consulting Services, Inc.

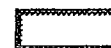


SRB

9-Jun-04		RAYNIER				0.00		Unit #	SRB		
Parameter	O2	NOx	CO	SO2	NOx	CO	0.00	0.00	0.00	Comments	
Units	%V	ppmV	ppmV	ppmV	@15%O2	@15%O2					
25-May-04	9:22:39	4.07	588.21	0.49	189.55	206.25	0.17			SRB RA R1 PM R1	
25-May-04	9:23:39	4.06	588.70	0.49	190.43	206.21	0.17			SRB RA R1 PM R1	
25-May-04	9:24:39	4.17	589.88	0.69	192.20	207.99	0.24			SRB RA R1 PM R1	
25-May-04	9:25:39	4.11	594.90	0.49	193.68	209.02	0.17			SRB RA R1 PM R1	
25-May-04	9:26:39	4.13	588.60	0.49	195.74	207.02	0.17			SRB RA R1 PM R1	
25-May-04	9:27:39	4.15	593.62	0.69	194.56	209.15	0.24			SRB RA R1 PM R1	
25-May-04	9:28:39	4.25	601.78	0.49	195.15	213.22	0.17			SRB RA R1 PM R1	
25-May-04	9:29:39	4.29	598.93	0.49	197.22	212.68	0.17			SRB RA R1 PM R1	
25-May-04	9:30:39	4.24	601.88	0.69	198.99	213.10	0.24			SRB RA R1 PM R1	
25-May-04	9:31:39	4.23	598.44	0.49	197.51	211.82	0.17			SRB RA R1 PM R1	
25-May-04	9:32:39	4.18	594.41	0.69	197.51	209.77	0.24			SRB RA R1 PM R1	
25-May-04	9:33:39	4.09	588.60	0.69	197.22	206.57	0.24			SRB RA R1 PM R1	
25-May-04	9:34:39	4.08	588.31	0.49	195.45	206.34	0.17			SRB RA R1 PM R1	
25-May-04	9:35:39	4.08	589.00	0.49	193.68	206.62	0.17			SRB RA R1 PM R1	
25-May-04	9:36:39	4.10	589.29	0.49	194.56	206.96	0.17			SRB RA R1 PM R1	
25-May-04	9:37:39	4.10	587.23	0.69	193.38	206.27	0.24			SRB RA R1   STOP	
25-May-04	9:38:39	4.17	593.23	0.49	198.99	209.23	0.17			SRB RA R1 PM R1	
25-May-04	9:41:06	-0.05	1.03	-0.30	248.55	0.29	-0.08			POST RA R1 SO2=248	
25-May-04	9:41:11	-0.06	0.69	-0.39	248.71	0.19	-0.11			POST RA R1 SO2=248	
25-May-04	9:41:16	-0.04	0.59	-0.39	248.41	0.17	-0.11			POST RA R1 SO2=248	
25-May-04	9:41:21	-0.05	0.59	-0.39	248.71	0.17	-0.11			POST RA R1 SO2=248	
25-May-04	9:41:26	-0.04	0.59	-0.39	248.71	0.17	-0.11			POST RA R1 SO2=248	
25-May-04	9:41:31	-0.05	0.49	-0.39	248.71	0.14	-0.11			POST RA R1 SO2=248	
25-May-04	9:41:36	-0.04	0.39	-0.39	248.71	0.11	-0.11			POST RA R1 SO2=248	
25-May-04	9:43:51	12.96	-0.79	-0.39	2.36	-0.58	-0.29			SO2=0	
25-May-04	9:43:56	12.95	-0.79	-0.59	2.07	-0.58	-0.44			SO2=0	
25-May-04	9:44:01	12.96	-0.89	-0.59	2.07	-0.66	-0.44			SO2=0	
25-May-04	9:44:06	12.96	-0.79	-0.39	1.77	-0.58	-0.29			SO2=0	
25-May-04	9:44:11	12.97	-0.89	-0.39	1.77	-0.66	-0.29			SO2=0	
25-May-04	9:46:20	4.19	590.25	0.59	196.19	208.46	0.21			RAR2 PMR' START	
25-May-04	9:47:20	4.20	587.30	0.59	194.72	207.51	0.21			RAR2 PMR1	
25-May-04	9:48:20	4.21	586.81	0.39	196.19	207.43	0.14			RAR2 PMR1	
25-May-04	9:49:20	4.18	586.22	0.20	196.49	206.92	0.07			RAR2 PMR1	
25-May-04	9:50:20	4.21	588.29	0.39	195.60	207.95	0.14			RAR2 PMR1	
25-May-04	9:51:20	4.19	590.25	0.59	196.49	208.40	0.21			RAR2 PMR1	
25-May-04	9:52:20	4.18	588.88	0.20	196.49	207.85	0.07			RAR2 PMR1	
25-May-04	9:53:20	4.22	589.76	0.59	196.19	208.63	0.21			RAR2 PMR1	
25-May-04	9:54:20	4.20	586.32	0.39	198.55	207.10	0.14			RAR2 PMR1	
25-May-04	9:55:20	4.25	592.22	0.39	197.67	209.81	0.14			RAR2 PMR1	
25-May-04	9:56:20	4.24	593.01	0.39	197.08	210.05	0.14			RAR2 PMR1	
25-May-04	9:57:20	4.25	591.43	0.39	200.03	209.62	0.14			RAR2 PMR1	
25-May-04	9:58:20	4.23	591.43	0.59	199.14	209.28	0.21			RAR2 PMR1	
25-May-04	9:59:20	4.21	593.50	0.39	199.14	209.76	0.14			RAR2 PMR1	
25-May-04	10:00:20	4.18	586.71	0.39	200.62	207.06	0.14			RAR2 PMR1	
25-May-04	10:01:20	4.19	587.60	0.39	197.67	207.46	0.14			RAR2 PMR1	
25-May-04	10:02:20	4.19	591.34	0.39	200.03	208.75	0.14			RAR2 PMR1	
25-May-04	10:03:20	4.16	592.22	0.39	198.85	208.76	0.14			RAR2 PMR1	
25-May-04	10:04:20	4.14	595.76	0.59	199.73	209.76	0.21			RAR2 PMR1	
25-May-04	10:05:20	4.14	589.37	0.39	200.33	207.48	0.14			RAR2 PMR1	
25-May-04	10:06:20	4.28	593.20	0.39	200.03	210.62	0.14			RAR2 PMR1	
25-May-04	10:07:20	4.30	596.84	0.39	201.80	212.13	0.14			RAR2 PMR' STOP	
25-May-04	10:08:58	12.94	0.20	-0.39	1.77	0.15	-0.29			POST RA R2 SO2=0	
25-May-04	10:09:03	12.94	0.00	-0.59	1.48	0.00	-0.44			POST RA R2 SO2=0	
25-May-04	10:09:08	12.94	-0.20	-0.59	1.18	-0.15	-0.44			POST RA R2 SO2=0	
25-May-04	10:09:13	12.96	-0.10	-0.59	0.89	-0.07	-0.44			POST RA R2 SO2=0	
25-May-04	10:09:18	12.94	-0.10	-0.79	1.18	-0.07	-0.58			POST RA R2 SO2=0	
25-May-04	10:09:23	12.95	-0.20	-0.59	1.48	-0.15	-0.44			POST RA R2 SO2=0	



Source Testing And Consulting Services, Inc.



SRB

9-Jun-04		RAYNIER						0.00	Unit#	SRB	
	Parameter	O2	NOx	CO	SO2	NOx	CO	0.00	0.00	Comments	
	Units	%V	ppmV	ppmV	ppmV	@15%O2	@15%O2	0.00	0.00		
25-May-04	10:12:36	-0.03	-0.10	-0.39	248.12	-0.03	-0.11			SO2=248	
25-May-04	10:12:41	-0.04	-0.20	-0.59	248.71	-0.06	-0.17			SO2=248	
25-May-04	10:12:46	-0.04	-0.30	-0.39	248.71	-0.08	-0.11			SO2=248	
25-May-04	10:12:51	-0.05	-0.30	-0.39	248.71	-0.08	-0.11			SO2=248	
25-May-04	10:12:56	-0.04	-0.30	-0.39	248.71	-0.08	-0.11			SO2=248	
25-May-04	10:13:01	-0.04	-0.20	-0.39	248.71	-0.06	-0.11			SO2=248	
25-May-04	10:13:06	-0.05	-0.30	-0.39	248.71	-0.08	-0.11			SO2=248	
25-May-04	10:14:34	4.21	591.83	0.39	199.14	209.17	0.14			RA R3 PM F START	
25-May-04	10:15:34	4.19	596.25	0.39	199.44	210.52	0.14			RA R3 PM R1	
25-May-04	10:16:34	4.19	598.32	0.59	198.55	211.25	0.21			RA R3 PM R1	
25-May-04	10:17:34	4.18	590.84	0.39	197.67	208.52	0.14			RA R3 PM R1	
25-May-04	10:18:34	4.16	592.52	0.59	198.85	208.86	0.21			RA R3 PM R1	
25-May-04	10:19:34	4.17	595.66	0.39	197.08	210.12	0.14			RA R3 PM R1	
25-May-04	10:20:34	4.18	596.35	0.39	197.96	210.43	0.14			RA R3 PM R1	
25-May-04	10:21:34	4.16	590.77	0.69	198.69	208.18	0.24			RA R3 PM R1	
25-May-04	10:22:34	4.14	593.82	0.49	198.40	208.98	0.17			RA R3 PM R1	
25-May-04	10:23:34	4.10	587.82	0.49	199.28	206.41	0.17			RA R3 PM R1	
25-May-04	10:24:34	4.20	597.06	0.69	199.28	210.93	0.24			RA R3 PM R1	
25-May-04	10:25:34	4.19	592.63	0.49	199.28	209.27	0.17			RA R3 PM R1	
25-May-04	10:26:34	4.18	601.58	0.49	201.64	212.27	0.17			RA R3 PM R1	
25-May-04	10:27:34	4.19	601.68	0.49	202.53	212.46	0.17			RA R3 PM R1	
25-May-04	10:28:34	4.21	597.26	0.49	202.53	211.12	0.17			RA R3 PM R1	
25-May-04	10:29:34	4.19	603.75	0.49	203.41	213.22	0.17			RA R3 PM R1	
25-May-04	10:30:34	4.23	591.65	0.49	202.23	209.38	0.17			RA R3 PM R1	
25-May-04	10:31:34	4.26	592.24	0.30	204.30	209.96	0.10			RA R3 PM R1	
25-May-04	10:32:34	4.25	599.81	0.49	202.23	212.55	0.17			RA R3 PM R1	
25-May-04	10:33:34	4.26	604.73	0.49	204.30	214.36	0.17			RA R3 PM R1	
25-May-04	10:34:34	4.25	597.36	0.49	205.18	211.62	0.17			RA R3 PM R1	
25-May-04	10:35:34	4.22	595.98	0.69	204.00	210.82	0.24			RA R3 PM F STOP	
25-May-04	10:38:15	-0.05	0.34	-0.30	249.44	0.10	-0.08			POST RA R3 SO2=248	
25-May-04	10:38:20	-0.06	0.25	-0.30	249.73	0.07	-0.08			POST RA R3 SO2=248	
25-May-04	10:38:25	-0.05	0.34	-0.30	249.44	0.10	-0.08			POST RA R3 SO2=248	
25-May-04	10:38:30	-0.06	0.25	-0.49	249.44	0.07	-0.14			POST RA R3 SO2=248	
25-May-04	10:38:35	-0.05	0.25	-0.49	249.14	0.07	-0.14			POST RA R3 SO2=248	
25-May-04	10:38:40	-0.04	0.25	-0.30	249.44	0.07	-0.08			POST RA R3 SO2=248	
25-May-04	10:38:45	-0.06	0.15	-0.49	249.44	0.04	-0.14			POST RA R3 SO2=248	
25-May-04	10:38:50	-0.05	0.25	-0.49	249.44	0.07	-0.14			POST RA R3 SO2=248	
25-May-04	10:38:55	-0.05	0.25	-0.49	249.14	0.07	-0.14			POST RA R3 SO2=248	
25-May-04	10:39:00	-0.06	0.15	-0.49	249.44	0.04	-0.14			POST RA R3 SO2=248	
25-May-04	10:39:05	-0.05	0.05	-0.30	249.44	0.01	-0.08			POST RA R3 SO2=248	
25-May-04	10:41:29	12.95	-0.98	-0.59	1.77	-0.73	-0.44			O2=12.98	
25-May-04	10:41:34	12.95	-0.98	-0.59	1.77	-0.73	-0.44			O2=12.98	
25-May-04	10:41:39	12.95	-0.98	-0.59	1.18	-0.73	-0.44			O2=12.98	
25-May-04	10:41:44	12.94	-0.98	-0.59	1.18	-0.73	-0.44			O2=12.98	
25-May-04	10:41:49	12.95	-1.08	-0.79	1.48	-0.80	-0.58			O2=12.98	
25-May-04	10:41:54	12.95	-1.08	-0.39	1.48	-0.80	-0.29			O2=12.98	
25-May-04	10:41:59	12.94	-0.98	-0.39	0.89	-0.73	-0.29			O2=12.98	
25-May-04	10:42:04	12.95	-0.98	-0.39	0.89	-0.73	-0.29			O2=12.98	
25-May-04	10:42:09	12.96	-1.08	-0.59	0.59	-0.80	-0.44			O2=12.98	
25-May-04	10:42:14	12.96	-1.08	-0.59	0.89	-0.80	-0.44			O2=12.98	
25-May-04	10:42:19	12.95	-1.08	-0.59	0.89	-0.80	-0.44			O2=12.98	
25-May-04	10:42:24	12.95	-1.18	-0.59	0.89	-0.88	-0.44			O2=12.98	
25-May-04	10:42:29	12.96	-1.18	-0.39	0.30	-0.88	-0.29			O2=12.98	
25-May-04	10:42:34	12.96	-1.18	-0.39	0.89	-0.88	-0.29			O2=12.98	
25-May-04	10:42:39	12.96	-1.08	-0.59	0.59	-0.80	-0.44			O2=12.98	
25-May-04	10:42:44	12.96	-1.08	-0.79	0.59	-0.80	-0.58			O2=12.98	
25-May-04	10:42:49	12.96	-1.08	-0.39	0.30	-0.80	-0.29			O2=12.98	

Source Testing And Consulting Services, Inc.



SRB

9-Jun-04		RAYNIER						0.00	Unit #	SRB	
	Parameter	O2	NOx	CO	SO2	NOx	CO	0.00	0.00	Comments	
	Units	%V	ppmV	ppmV	ppmV	@15%O2	@15%O2	0.00	0.00		
25-May-04	10:42:54	12.96	-1.08	-0.59	0.59	-0.80	-0.44			O2=12.98	
25-May-04	10:46:52	-0.01	899.54	846.14	0.59	253.80	238.74			NX=907	
25-May-04	10:46:57	-0.02	899.05	846.34	0.59	253.61	238.74			NX=907	
25-May-04	10:47:02	0.00	898.95	846.14	0.30	253.79	238.88			NX=907	
25-May-04	10:47:07	0.00	899.35	853.22	0.59	253.87	240.85			NX=907	
25-May-04	10:47:12	-0.02	899.35	853.42	0.59	253.69	240.73			NX=907	
25-May-04	10:47:17	0.00	899.54	845.16	0.59	253.92	238.57			NX=907	
25-May-04	10:47:22	0.00	899.64	845.36	0.59	253.92	238.60			NX=907	
25-May-04	10:47:27	-0.01	898.95	853.22	0.59	253.67	240.76			NX=907	
25-May-04	10:47:32	0.00	899.25	853.22	0.89	253.84	240.85			NX=907	
25-May-04	10:47:37	0.00	898.36	842.41	0.59	253.56	237.77			NX=907	
25-May-04	10:47:42	-0.01	898.85	842.41	0.59	253.58	237.65			NX=907	
25-May-04	10:47:47	0.00	899.94	852.24	0.89	254.06	240.60			NX=907	
25-May-04	10:47:52	-0.01	899.35	852.44	0.59	253.72	240.48			NX=907	
25-May-04	10:47:57	-0.01	899.15	851.45	0.59	253.69	240.24			NX=907	
25-May-04	10:48:02	0.00	898.76	851.26	0.59	253.70	240.29			NX=907	
25-May-04	10:52:19	-0.06	10.33	15.36	0.30	2.91	4.33			CO=15.6	
25-May-04	10:52:24	-0.04	10.23	15.15	0.30	2.88	4.27			CO=15.6	
25-May-04	10:52:29	-0.05	10.23	15.36	0.30	2.88	4.33			CO=15.6	
25-May-04	10:52:34	-0.04	10.13	15.36	0.30	2.85	4.33			CO=15.6	
25-May-04	10:52:39	-0.03	10.33	15.36	0.30	2.91	4.33			CO=15.6	
25-May-04	10:52:44	-0.05	10.13	15.36	0.00	2.85	4.33			CO=15.6	
25-May-04	11:11:30	4.22	619.76	0.42	206.23	219.17	0.15			RA R4 PM F START	
25-May-04	11:12:30	4.22	636.18	0.42	208.29	225.05	0.15			RA R4 PM R2	
25-May-04	11:13:30	4.19	624.58	0.42	208.00	220.58	0.15			RA R4 PM R2	
25-May-04	11:14:30	4.18	626.44	0.63	206.52	221.11	0.22			RA R4 PM R2	
25-May-04	11:15:30	4.18	627.82	0.63	206.82	221.57	0.22			RA R4 PM R2	
25-May-04	11:16:30	4.20	625.56	0.63	207.70	221.03	0.22			RA R4 PM R2	
25-May-04	11:17:30	4.12	624.87	0.42	207.70	219.72	0.15			RA R4 PM R2	
25-May-04	11:18:30	4.05	615.04	0.42	207.41	215.34	0.15			RA R4 PM R2	
25-May-04	11:19:30	3.97	609.63	0.42	205.93	212.49	0.15			RA R4 PM R2	
25-May-04	11:20:30	3.94	598.52	0.42	204.46	208.25	0.15			RA R4 PM R2	
25-May-04	11:21:30	3.95	604.83	0.74	203.41	210.48	0.26			RA R4 PM R2	
25-May-04	11:22:30	3.93	606.80	0.74	204.59	210.95	0.26			RA R4 PM R2	
25-May-04	11:23:30	3.92	602.47	0.53	203.71	209.35	0.18			RA R4 PM R2	
25-May-04	11:24:30	3.93	615.15	0.53	202.82	213.85	0.18			RA R4 PM R2	
25-May-04	11:25:30	3.93	602.96	0.74	205.48	209.68	0.26			RA R4 PM R2	
25-May-04	11:26:30	3.94	612.70	0.74	204.00	213.12	0.26			RA R4 PM R2	
25-May-04	11:27:30	3.87	601.49	1.79	204.59	208.44	0.62			RA R4 PM R2	
25-May-04	11:28:30	3.85	601.88	1.58	204.89	208.33	0.55			RA R4 PM R2	
25-May-04	11:29:30	3.90	599.32	1.79	204.30	207.96	0.62			RA R4 PM R2	
25-May-04	11:30:30	3.98	614.56	0.53	204.00	214.33	0.18			RA R4 PM R2	
25-May-04	11:31:30	3.94	609.16	0.53	205.18	211.89	0.18			RA R4 PM R2	
25-May-04	11:32:30	3.85	601.68	1.58	206.66	208.27	0.55			RA R4 PM F STOP	
25-May-04	11:34:58	-0.05	10.96	15.26	1.33	3.09	4.30			POST RAR4 ZERO	
25-May-04	11:35:03	-0.05	10.77	15.26	1.33	3.03	4.30			POST RAR4 ZERO	
25-May-04	11:35:08	-0.05	10.67	15.26	0.74	3.00	4.30			POST RAR4 ZERO	
25-May-04	11:35:13	-0.04	10.67	15.26	1.03	3.01	4.30			POST RAR4 ZERO	
25-May-04	11:35:18	-0.05	10.67	15.26	1.03	3.00	4.30			POST RAR4 ZERO	
25-May-04	11:35:23	-0.04	10.67	15.26	0.74	3.01	4.30			POST RAR4 ZERO	
25-May-04	11:35:28	-0.05	10.57	15.26	1.03	2.98	4.30			POST RAR4 ZERO	
25-May-04	11:37:40	-0.05	-0.05	-0.53	247.96	-0.01	-0.15			SO2=248	
25-May-04	11:37:45	-0.05	0.05	-0.32	248.55	0.01	-0.09			SO2=248	
25-May-04	11:37:50	-0.05	0.05	-0.32	248.55	0.01	-0.09			SO2=248	
25-May-04	11:37:55	-0.05	-0.05	-0.53	248.26	-0.01	-0.15			SO2=248	
25-May-04	11:38:00	-0.04	0.05	-0.32	248.26	0.01	-0.09			SO2=248	
25-May-04	11:38:05	-0.05	-0.05	-0.32	248.26	-0.01	-0.09			SO2=248	

Source Testing And Consulting Services, Inc.



SRB

9-Jun-04		RAYNIER			0.00			Unit #	SRB		
Parameter		O2	NOx	CO	SO2	NOx	CO	0.00	0.00	Comments	
Units		%V	ppmV	ppmV	ppmV	@15%O2	@15%O2	0.00	0.00		
25-May-04	11:38:10	-0.05	-0.05	-0.32	247.96	-0.01	-0.09			SO2=248	
25-May-04	11:39:45	3.85	614.47	0.53	205.77	212.69	0.18			RAR5 PMR2 START	
25-May-04	11:40:45	3.86	605.22	0.53	207.25	209.55	0.18			RAR5 PMR2	
25-May-04	11:41:45	3.79	612.43	1.58	206.08	211.17	0.54			RAR5 PMR2	
25-May-04	11:42:45	3.86	616.36	1.79	205.49	213.35	0.62			RAR5 PMR2	
25-May-04	11:43:45	3.85	602.30	1.79	207.26	208.39	0.62			RAR5 PMR2	
25-May-04	11:44:45	3.81	598.17	1.79	208.14	206.46	0.62			RAR5 PMR2	
25-May-04	11:45:45	3.84	606.63	1.79	207.85	209.74	0.62			RAR5 PMR2	
25-May-04	11:46:45	3.81	604.86	1.79	208.44	208.86	0.62			RAR5 PMR2	
25-May-04	11:47:45	3.84	614.50	0.53	208.14	212.46	0.18			RAR5 PMR2	
25-May-04	11:48:45	3.90	610.86	0.74	208.73	212.06	0.26			RAR5 PMR2	
25-May-04	11:49:45	3.91	614.69	0.53	212.57	213.42	0.18			RAR5 PMR2	
25-May-04	11:50:45	3.90	616.17	0.74	211.09	213.81	0.26			RAR5 PMR2	
25-May-04	11:51:45	3.86	612.43	0.74	212.57	212.08	0.26			RAR5 PMR2	
25-May-04	11:52:45	3.89	624.04	0.53	211.98	216.41	0.18			RAR5 PMR2	
25-May-04	11:53:45	3.87	621.58	0.53	213.45	215.40	0.18			RAR5 PMR2	
25-May-04	11:54:45	3.87	622.17	0.74	212.86	215.55	0.26			RAR5 PMR2	
25-May-04	11:55:45	3.87	609.48	1.79	214.04	211.12	0.62			RAR5 PMR2	
25-May-04	11:56:45	3.91	614.89	1.79	215.81	213.49	0.62			RAR5 PMR2	
25-May-04	11:57:45	3.87	610.46	1.58	215.22	211.52	0.55			RAR5 PMR2	
25-May-04	11:58:45	3.88	618.33	0.32	218.76	214.40	0.11			RAR5 PMR2	
25-May-04	11:59:45	3.86	611.35	1.58	216.70	211.74	0.55			RAR5 PMR2	
25-May-04	12:00:45	3.86	611.05	1.58	217.58	211.54	0.55			RAR5 PMR2 STOP	
25-May-04	12:02:50	-0.06	0.93	-0.32	248.26	0.26	-0.09			POST RAR5 SO2 248	
25-May-04	12:02:55	-0.05	0.74	-0.32	248.85	0.21	-0.09			POST RAR5 SO2 248	
25-May-04	12:03:00	-0.05	0.64	-0.53	248.85	0.18	-0.15			POST RAR5 SO2 248	
25-May-04	12:03:05	-0.06	0.64	-0.53	248.26	0.18	-0.15			POST RAR5 SO2 248	
25-May-04	12:03:10	-0.05	0.44	-0.53	248.85	0.12	-0.15			POST RAR5 SO2 248	
25-May-04	12:03:15	-0.05	0.54	-0.53	248.55	0.15	-0.15			POST RAR5 SO2 248	
25-May-04	12:03:20	-0.06	0.44	-0.53	248.55	0.12	-0.15			POST RAR5 SO2 248	
25-May-04	12:05:25	-0.05	9.98	15.26	1.33	2.81	4.30			ZERO	
25-May-04	12:05:30	-0.06	10.08	15.26	0.74	2.84	4.30			ZERO	
25-May-04	12:05:35	-0.05	9.98	15.26	0.74	2.81	4.30			ZERO	
25-May-04	12:05:40	-0.05	10.08	15.26	1.03	2.84	4.30			ZERO	
25-May-04	12:05:45	-0.05	9.98	15.26	1.03	2.81	4.30			ZERO	
25-May-04	12:08:11	3.85	614.47	1.79	216.39	212.69	0.62			RAR6 PMR2 START	
25-May-04	12:09:11	3.93	619.28	0.53	214.33	215.32	0.18			RAR6 PMR2	
25-May-04	12:10:11	3.85	609.25	0.53	214.92	210.89	0.18			RAR6 PMR2	
25-May-04	12:11:11	3.86	618.99	1.58	213.15	214.35	0.55			RAR6 PMR2	
25-May-04	12:12:11	3.85	624.79	0.53	212.26	216.26	0.18			RAR6 PMR2	
25-May-04	12:13:11	3.86	618.01	1.58	211.38	213.95	0.55			RAR6 PMR2	
25-May-04	12:14:11	3.86	613.48	0.53	209.02	212.44	0.18			RAR6 PMR2	
25-May-04	12:15:11	3.82	616.33	1.79	208.43	212.88	0.62			RAR6 PMR2	
25-May-04	12:16:11	3.83	615.84	1.79	209.02	212.86	0.62			RAR6 PMR2	
25-May-04	12:17:11	3.83	613.38	1.58	207.84	212.01	0.55			RAR6 PMR2	
25-May-04	12:18:11	3.85	606.21	1.79	207.54	209.80	0.62			RAR6 PMR2	
25-May-04	12:19:11	3.80	606.99	1.79	206.66	209.44	0.62			RAR6 PMR2	
25-May-04	12:20:11	3.78	605.91	1.79	206.95	208.80	0.62			RAR6 PMR2	
25-May-04	12:21:11	3.77	604.22	1.68	208.00	208.11	0.58			RAR6 PMR2	
25-May-04	12:22:11	3.78	605.40	1.68	206.23	208.70	0.58			RAR6 PMR2	
25-May-04	12:23:11	3.77	601.76	1.68	208.88	207.23	0.58			RAR6 PMR2	
25-May-04	12:24:11	3.80	599.20	1.47	208.88	206.80	0.51			RAR6 PMR2	
25-May-04	12:25:11	3.78	595.66	1.47	209.18	205.31	0.51			RAR6 PMR2	
25-May-04	12:26:11	3.74	592.71	1.68	213.01	203.83	0.58			RAR6 PMR2	
25-May-04	12:27:11	3.76	596.45	1.47	210.36	205.29	0.51			RAR6 PMR2	
25-May-04	12:28:11	3.72	592.91	1.68	212.72	203.66	0.58			RAR6 PMR2	
25-May-04	12:29:11	3.78	593.50	1.68	214.49	204.57	0.58			RAR6 PMR2 STOP	

Source Testing And Consulting Services, Inc.



SRB

9-Jun-04		RAYNIER			0.00			Unit #	SRB	
	Parameter	O2	NOx	CO	SO2	NOx	CO	0.00	0.00	Comments
	Units	%V	ppmV	ppmV	ppmV	@15%O2	@15%O2	0.00	0.00	
25-May-04	12:30:43	-0.05	10.92	15.36	1.18	3.07	4.33			POST RA6 ZERO
25-May-04	12:30:48	-0.06	10.82	15.15	1.18	3.05	4.27			POST RA6 ZERO
25-May-04	12:30:53	-0.05	10.62	15.15	1.48	2.99	4.27			POST RA6 ZERO
25-May-04	12:30:58	-0.07	10.62	15.36	1.48	2.99	4.32			POST RA6 ZERO
25-May-04	12:31:03	-0.05	10.72	15.36	1.18	3.02	4.33			POST RA6 ZERO
25-May-04	12:32:59	-0.05	0.10	-0.63	247.23	0.03	-0.18			SO=248
25-May-04	12:33:04	-0.06	0.10	-0.42	247.53	0.03	-0.12			SO=248
25-May-04	12:33:09	-0.05	0.00	-0.42	247.23	0.00	-0.12			SO=248
25-May-04	12:33:14	-0.07	0.00	-0.63	247.23	0.00	-0.18			SO=248
25-May-04	12:33:19	-0.05	0.00	-0.63	247.23	0.00	-0.18			SO=248
25-May-04	12:38:06	-0.03	901.12	1,068.05	0.30	254.07	301.14			NX=907
25-May-04	12:38:11	-0.02	900.33	1,068.05	0.59	253.91	301.21			NX=907
25-May-04	12:38:16	-0.02	900.53	1,068.26	0.59	253.93	301.23			NX=907
25-May-04	12:38:21	-0.02	900.33	1,068.05	0.89	253.94	301.24			NX=907
25-May-04	12:38:26	-0.02	900.23	1,068.26	1.18	253.88	301.27			NX=907
25-May-04	12:39:57	12.96	0.30	0.63	0.89	0.22	0.47			O2=12.98
25-May-04	12:40:02	12.98	0.20	-0.63	0.89	0.15	-0.47			O2=12.98
25-May-04	12:40:07	12.96	0.10	-0.42	0.59	0.07	-0.31			O2=12.98
25-May-04	12:40:12	12.97	0.10	-0.63	0.30	0.07	-0.47			O2=12.98
25-May-04	12:40:17	12.97	0.00	-0.63	0.30	0.00	-0.47			O2=12.98
25-May-04	13:05:02	3.84	602.32	3.58	220.67	208.32	1.24			RAR7 PMR: START
25-May-04	13:06:02	3.90	600.06	1.68	218.90	208.23	0.58			RAR7 PMR3
25-May-04	13:07:02	3.88	594.65	1.68	221.26	208.17	0.58			RAR7 PMR3
25-May-04	13:08:02	3.90	603.30	1.89	224.51	209.36	0.66			RAR7 PMR3
25-May-04	13:09:02	3.85	598.58	1.47	223.33	207.15	0.51			RAR7 PMR3
25-May-04	13:10:02	3.87	594.65	1.68	222.44	206.03	0.58			RAR7 PMR3
25-May-04	13:11:02	3.92	593.08	1.47	223.33	206.05	0.51			RAR7 PMR3
25-May-04	13:12:02	3.87	598.58	3.79	224.21	207.42	1.31			RAR7 PMR3
25-May-04	13:13:02	3.86	595.34	1.68	223.92	206.14	0.58			RAR7 PMR3
25-May-04	13:14:02	3.82	592.78	1.68	224.21	204.82	0.58			RAR7 PMR3
25-May-04	13:15:02	3.85	597.80	1.68	222.44	206.82	0.58			RAR7 PMR3
25-May-04	13:16:02	3.87	592.68	2.53	222.44	205.34	0.87			RAR7 PMR3
25-May-04	13:17:02	3.86	592.88	1.47	221.85	205.29	0.51			RAR7 PMR3
25-May-04	13:18:02	3.89	593.37	1.68	223.33	205.79	0.58			RAR7 PMR3
25-May-04	13:19:02	3.88	593.37	1.68	222.74	205.67	0.58			RAR7 PMR3
25-May-04	13:20:02	3.87	594.16	1.68	221.56	205.85	0.58			RAR7 PMR3
25-May-04	13:21:02	3.85	597.40	1.68	222.44	206.68	0.58			RAR7 PMR3
25-May-04	13:22:02	3.88	602.84	1.47	223.63	209.02	0.51			RAR7 PMR3
25-May-04	13:23:02	3.89	595.07	1.47	223.04	206.41	0.51			RAR7 PMR3
25-May-04	13:24:02	3.90	594.19	1.47	223.63	206.25	0.51			RAR7 PMR3
25-May-04	13:25:02	3.88	589.76	1.47	222.45	204.48	0.51			RAR7 PMR3
25-May-04	13:26:02	3.89	591.53	2.53	223.93	205.13	0.88			RAR7 PMR: STOP
25-May-04	13:28:29	-0.07	0.49	-0.63	246.64	0.14	-0.18			SO2=248
25-May-04	13:28:34	-0.07	0.39	-0.63	246.94	0.11	-0.18			SO2=248
25-May-04	13:28:39	-0.07	0.39	-0.63	246.94	0.11	-0.18			SO2=248
25-May-04	13:28:44	-0.06	0.30	-0.42	246.94	0.08	-0.12			SO2=248
25-May-04	13:28:49	-0.06	0.30	-0.84	246.94	0.08	-0.24			SO2=248
25-May-04	13:28:54	-0.06	0.39	-0.63	246.94	0.11	-0.18			SO2=248
25-May-04	13:28:59	-0.06	0.20	-0.63	246.94	0.06	-0.18			SO2=248
25-May-04	13:31:11	-0.05	9.64	15.15	0.59	2.71	4.27			ZERO
25-May-04	13:31:16	-0.06	9.74	15.15	0.89	2.74	4.27			ZERO
25-May-04	13:31:21	-0.07	9.64	15.15	0.89	2.71	4.26			ZERO
25-May-04	13:31:26	-0.06	9.54	15.15	0.59	2.69	4.27			ZERO
25-May-04	13:31:31	-0.06	9.64	15.15	0.59	2.71	4.27			ZERO
25-May-04	13:33:10	3.83	597.34	2.53	220.68	206.51	0.87			RAR8 PMR: START
25-May-04	13:34:10	3.82	588.68	2.31	224.22	203.31	0.80			RAR8 PMR3
25-May-04	13:35:10	3.86	596.25	1.47	222.45	206.43	0.51			RAR8 PMR3

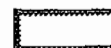
Source Testing And Consulting Services, Inc.



SRB

9-Jun-04		RAYNIER						0.00		Unit#	SRB	
Parameter		O2	NOx	CO	SO2	NOx	CO	0.00	0.00	Comments		
Units		%V	ppmV	ppmV	ppmV	@15%O2	@15%O2	0.00	0.00			
25-May-04	13:36:10	3.87	594.78	1.47	224.81	206.04	0.51			RAR8 PMR3		
25-May-04	13:37:10	3.80	591.83	2.74	224.52	204.25	0.94			RAR8 PMR3		
25-May-04	13:38:10	3.88	598.22	2.31	223.34	207.32	0.80			RAR8 PMR3		
25-May-04	13:39:10	3.85	594.09	2.53	222.16	205.57	0.87			RAR8 PMR3		
25-May-04	13:40:10	3.84	593.40	1.47	225.40	205.24	0.51			RAR8 PMR3		
25-May-04	13:41:10	3.86	602.25	1.47	223.63	208.51	0.51			RAR8 PMR3		
25-May-04	13:42:10	3.89	596.42	1.47	223.33	206.83	0.51			RAR8 PMR3		
25-May-04	13:43:10	3.85	589.44	1.68	223.33	203.97	0.58			RAR8 PMR3		
25-May-04	13:44:10	3.88	595.73	1.68	223.92	206.50	0.58			RAR8 PMR3		
25-May-04	13:45:10	3.91	599.37	1.47	220.97	208.10	0.51			RAR8 PMR3		
25-May-04	13:46:10	3.89	600.55	1.68	223.03	208.26	0.58			RAR8 PMR3		
25-May-04	13:47:10	3.88	598.49	1.68	220.97	207.46	0.58			RAR8 PMR3		
25-May-04	13:48:10	3.88	595.24	1.47	220.97	206.33	0.51			RAR8 PMR3		
25-May-04	13:49:10	3.89	601.83	1.47	220.67	208.71	0.51			RAR8 PMR3		
25-May-04	13:50:10	3.89	600.65	1.47	220.67	208.36	0.51			RAR8 PMR3		
25-May-04	13:51:10	3.90	599.67	1.47	218.90	208.17	0.51			RAR8 PMR3		
25-May-04	13:52:10	3.87	597.40	1.47	217.13	206.96	0.51			RAR8 PMR3		
25-May-04	13:53:10	3.89	593.37	1.68	219.20	205.78	0.58			RAR8 PMR3		
25-May-04	13:54:10	3.84	600.35	3.58	213.30	207.60	1.24			RAR8 PMR: STOP		
25-May-04	13:55:11	-0.06	11.31	13.05	1.18	3.18	3.67			Test		
25-May-04	13:55:23	-0.07	10.92	14.31	0.89	3.07	4.03			ZERO		
25-May-04	13:55:28	-0.06	10.92	15.36	0.59	3.07	4.33			ZERO		
25-May-04	13:55:33	-0.06	10.82	15.15	0.59	3.04	4.26			ZERO		
25-May-04	13:55:38	-0.06	10.82	15.15	0.89	3.05	4.27			ZERO		
25-May-04	13:55:43	-0.06	10.72	15.15	0.59	3.02	4.26			ZERO		
25-May-04	13:55:48	-0.06	10.82	15.15	0.89	3.05	4.27			ZERO		
25-May-04	13:55:53	-0.06	10.62	15.15	0.59	2.99	4.26			ZERO		
25-May-04	13:55:58	-0.06	10.62	15.36	0.59	2.99	4.32			ZERO		
25-May-04	13:57:47	-0.06	0.10	-0.63	246.04	0.03	-0.18			SO2=248		
25-May-04	13:57:52	-0.06	0.10	-0.63	246.04	0.03	-0.18			SO2=248		
25-May-04	13:57:57	-0.06	0.10	-0.63	246.34	0.03	-0.18			SO2=248		
25-May-04	13:58:02	-0.06	0.10	-0.63	246.34	0.03	-0.18			SO2=248		
25-May-04	13:58:07	-0.06	0.10	-0.42	246.63	0.03	-0.12			SO2=248		
25-May-04	13:58:12	-0.06	0.10	-0.63	246.34	0.03	-0.18			SO2=248		
25-May-04	13:58:17	-0.05	-0.10	-0.63	246.34	-0.03	-0.18			SO2=248		
25-May-04	14:00:07	3.92	608.61	1.47	214.77	211.49	0.51			RAR9 PMR: START		
25-May-04	14:01:07	4.00	621.79	1.68	215.36	217.04	0.59			RAR9 PMR3		
25-May-04	14:02:09	3.87	597.45	1.58	216.98	206.98	0.55			RAR9 PMR3		
25-May-04	14:03:09	3.73	589.29	2.63	215.80	202.55	0.90			RAR9 PMR3		
25-May-04	14:04:08	3.74	595.78	6.00	214.92	204.81	2.06			RAR9 PMR3		
25-May-04	14:05:08	3.75	594.60	4.73	212.85	204.58	1.63			RAR9 PMR3		
25-May-04	14:06:09	3.84	604.34	4.73	214.62	209.03	1.64			RAR9 PMR3		
25-May-04	14:07:09	3.88	602.17	2.63	215.21	208.74	0.91			RAR9 PMR3		
25-May-04	14:08:09	3.86	610.73	1.79	219.05	211.52	0.62			RAR9 PMR3		
25-May-04	14:09:09	3.85	599.81	2.42	219.34	207.59	0.84			RAR9 PMR3		
25-May-04	14:10:09	3.89	607.78	3.68	219.64	210.80	1.28			RAR9 PMR3		
25-May-04	14:11:09	3.94	608.27	1.79	219.93	211.55	0.62			RAR9 PMR3		
25-May-04	14:12:08	3.94	609.45	1.58	221.70	212.06	0.55			RAR9 PMR3		
25-May-04	14:13:09	3.93	604.53	1.58	220.82	210.16	0.55			RAR9 PMR3		
25-May-04	14:14:09	3.92	609.84	1.79	223.77	211.89	0.62			RAR9 PMR3		
25-May-04	14:15:08	3.86	610.43	1.79	223.18	211.36	0.62			RAR9 PMR3		
25-May-04	14:16:08	3.89	610.14	2.63	221.41	211.62	0.91			RAR9 PMR3		
25-May-04	14:17:08	3.83	610.24	2.84	222.29	210.92	0.98			RAR9 PMR3		
25-May-04	14:18:08	3.78	598.34	3.68	220.52	206.25	1.27			RAR9 PMR3		
25-May-04	14:19:08	3.80	602.86	6.63	220.23	207.98	2.29			RAR9 PMR3		
25-May-04	14:20:08	3.83	601.98	2.63	220.82	208.07	0.91			RAR9 PMR3		
25-May-04	14:21:08	3.84	604.44	1.79	219.64	209.04	0.62			RAR9 PMR: STOP		

Source Testing And Consulting Services, Inc.



SRB

9-Jun-04	RAYNIER	0.00						Unit #	SRB	
Parameter	O2	NOx	CO	SO2	NOx	CO	0.00	0.00	Comments	
Units	%V	ppmV	ppmV	ppmV	@15%O2	@15%O2	0.00	0.00		
25-May-04	14:22:54	-0.06	1.13	-0.53	246.78	0.32	-0.15		POST RAR9 SO2=148	
25-May-04	14:22:59	-0.06	0.93	-0.53	247.37	0.26	-0.15		POST RAR9 SO2=148	
25-May-04	14:23:04	-0.06	0.84	-0.32	247.37	0.24	-0.09		POST RAR9 SO2=148	
25-May-04	14:23:09	-0.07	0.74	-0.53	247.37	0.21	-0.15		POST RAR9 SO2=148	
25-May-04	14:23:14	-0.07	0.74	-0.53	247.37	0.21	-0.15		POST RAR9 SO2=148	
25-May-04	14:24:40	-0.06	10.08	15.26	1.92	2.84	4.29		CO=15.6	
25-May-04	14:24:45	-0.07	10.08	15.26	1.33	2.84	4.29		CO=15.6	
25-May-04	14:24:50	-0.06	10.18	15.26	1.33	2.87	4.29		CO=15.6	
25-May-04	14:24:55	-0.06	10.18	15.26	0.74	2.86	4.29		CO=15.6	
25-May-04	14:26:05	-0.02	896.60	891.96	0.44	252.81	251.50		NX=907	
25-May-04	14:26:10	-0.03	896.89	1,068.11	0.44	252.86	301.13		NX=907	
25-May-04	14:26:15	-0.03	896.99	1,068.11	0.44	252.83	301.06		NX=907	
25-May-04	14:26:20	-0.02	897.19	1,068.32	0.44	252.98	301.23		NX=907	
25-May-04	14:26:25	-0.03	896.60	1,068.11	0.74	252.78	301.13		NX=907	
25-May-04	14:26:30	-0.02	896.30	1,068.11	0.74	252.73	301.17		NX=907	
25-May-04	14:26:35	-0.11	896.50	1,067.69	2.21	251.81	299.89		NX=907	
25-May-04	14:28:15	12.94	1.03	14.42	0.15	0.77	10.68		O2=12.98	
25-May-04	14:28:20	12.94	0.54	2.00	0.74	0.40	1.48		O2=12.98	
25-May-04	14:28:25	12.95	0.64	1.58	0.44	0.47	1.17		O2=12.98	
25-May-04	14:28:30	12.94	0.44	-0.74	0.44	0.33	-0.55		O2=12.98	
25-May-04	14:28:35	12.95	0.34	-0.32	0.15	0.26	-0.23		O2=12.98	
25-May-04	14:29:32	3.87	604.63	2.42	214.33	209.47	0.84		RAR10 START	
25-May-04	14:30:34	3.92	611.32	1.79	213.44	212.37	0.62		RAR10	
25-May-04	14:31:32	3.93	615.06	1.79	214.03	213.82	0.62		RAR10	
25-May-04	14:32:33	3.89	612.20	2.63	212.26	212.40	0.91		RAR10	
25-May-04	14:33:32	3.89	613.97	2.42	211.08	212.98	0.84		RAR10	
25-May-04	14:34:32	3.96	600.99	3.47	211.08	209.26	1.21		RAR10	
25-May-04	14:35:32	4.08	588.50	4.73	210.79	206.38	1.66		RAR10	
25-May-04	14:36:32	4.20	586.64	1.79	211.08	207.24	0.63		RAR10	
25-May-04	14:37:32	4.29	583.88	2.63	213.44	207.37	0.93		RAR10	
25-May-04	14:38:32	4.25	584.87	1.58	214.33	207.26	0.56		RAR10	
25-May-04	14:39:32	4.27	581.62	1.58	215.51	206.38	0.56		RAR10	
25-May-04	14:40:32	4.27	591.75	1.79	215.21	209.98	0.63		RAR10	
25-May-04	14:41:32	4.34	584.94	1.47	216.55	208.44	0.52		RAR10	
25-May-04	14:42:32	4.38	587.89	1.47	216.55	209.93	0.53		RAR10	
25-May-04	14:43:32	4.28	599.20	1.47	218.62	212.70	0.52		RAR10	
25-May-04	14:44:32	4.26	611.20	1.68	218.32	216.67	0.60		RAR10	
25-May-04	14:45:32	4.16	615.43	1.47	219.80	216.86	0.52		RAR10	
25-May-04	14:46:32	4.25	591.14	1.68	215.96	209.44	0.60		RAR10	
25-May-04	14:47:32	4.24	586.42	2.53	216.55	207.64	0.89		RAR10	
25-May-04	14:48:32	4.19	588.68	3.58	213.60	207.83	1.26		RAR10	
25-May-04	14:49:32	4.23	589.66	2.53	217.44	208.64	0.89		RAR10	
25-May-04	14:50:32	4.27	591.43	2.53	217.73	209.82	0.90		RAR10 STOP	
25-May-04	14:51:50	12.92	0.69	0.63	1.77	0.51	0.47		SO2=0	
25-May-04	14:51:54	12.92	0.39	-0.84	1.48	0.29	-0.62		SO2=0	
25-May-04	14:51:59	12.92	0.39	-0.84	1.18	0.29	-0.62		SO2=0	
25-May-04	14:52:04	12.93	0.20	-0.42	0.59	0.15	-0.31		SO2=0	
25-May-04	14:52:09	12.93	0.20	-0.63	1.18	0.15	-0.47		SO2=0	
25-May-04	14:54:11	-0.05	0.30	-0.42	246.94	0.08	-0.12		SO2=248	
25-May-04	14:54:16	-0.06	0.20	-0.63	246.94	0.06	-0.18		SO2=248	
25-May-04	14:54:21	-0.06	0.20	-0.42	246.35	0.06	-0.12		SO2=248	
25-May-04	14:54:26	-0.05	0.10	-0.63	246.35	0.03	-0.18		SO2=248	
25-May-04	14:54:31	-0.05	0.20	-0.63	246.35	0.06	-0.18		SO2=248	
25-May-04	14:54:36	-0.06	0.20	-0.42	246.35	0.06	-0.12		SO2=248	

Source Testing And Consulting Services, Inc.



scrubber B

9-Jun-04

RAYNIER

		O2	NOx	CO	SO2	Comments
Parameter	Units	%V	ppmV	ppmV	ppmV	
9-Jun-04	10:50:23	0.20	906.92	896.79	3.84	CE NX=907 CO=904
9-Jun-04	10:50:28	0.20	905.74	895.71	3.54	CE NX=907 CO=904
9-Jun-04	10:50:33	0.20	905.94	899.74	3.54	CE NX=907 CO=904
9-Jun-04	10:50:38	0.20	906.23	899.74	3.54	CE NX=907 CO=904
9-Jun-04	10:50:43	0.20	905.15	898.76	3.54	CE NX=907 CO=904
9-Jun-04	10:50:48	0.20	905.44	898.76	3.54	CE NX=907 CO=904
9-Jun-04	10:50:53	0.20	904.66	897.77	3.25	CE NX=907 CO=904
9-Jun-04	10:50:58	0.20	905.25	897.77	3.54	CE NX=907 CO=904
9-Jun-04	10:51:03	0.20	904.07	894.82	3.54	CE NX=907 CO=904
9-Jun-04	10:51:08	0.20	905.64	894.72	3.25	CE NX=907 CO=904
9-Jun-04	10:51:13	0.20	904.36	898.76	3.25	CE NX=907 CO=904
9-Jun-04	10:51:18	0.20	904.56	898.76	3.84	CE NX=907 CO=904
9-Jun-04	10:51:23	0.20	904.66	898.76	2.95	CE NX=907 CO=904
9-Jun-04	10:51:28	0.20	904.56	898.76	3.25	CE NX=907 CO=904
9-Jun-04	10:51:35	0.20	904.46	893.74	3.54	LB
9-Jun-04	10:51:40	0.19	903.67	897.77	3.54	LB
9-Jun-04	10:51:45	0.19	903.48	897.77	3.84	LB
9-Jun-04	10:51:50	0.20	903.18	895.71	3.54	LB
9-Jun-04	10:51:55	0.20	902.69	895.71	3.84	LB
9-Jun-04	10:52:00	0.20	902.99	899.74	3.54	LB
9-Jun-04	10:52:05	0.20	903.18	899.64	3.54	LB
9-Jun-04	10:52:10	0.20	902.99	892.86	3.54	LB
9-Jun-04	10:52:15	0.20	903.48	892.76	3.25	LB
9-Jun-04	10:52:20	0.20	903.28	894.72	3.54	LB
9-Jun-04	10:52:25	0.20	902.40	894.72	3.84	LB
9-Jun-04	10:52:30	0.20	901.81	894.72	4.13	LB
9-Jun-04	10:58:43	0.17	456.41	611.50	3.54	CE NX=456 CO=619
9-Jun-04	10:58:48	0.17	455.82	612.78	3.54	CE NX=456 CO=619
9-Jun-04	10:58:53	0.17	456.31	609.63	3.84	CE NX=456 CO=619
9-Jun-04	10:58:58	0.17	456.41	609.63	3.54	CE NX=456 CO=619
9-Jun-04	10:59:03	0.17	456.51	611.50	3.54	CE NX=456 CO=619
9-Jun-04	10:59:08	0.17	456.02	611.60	3.25	CE NX=456 CO=619
9-Jun-04	10:59:14	0.17	456.31	610.61	3.84	LB
9-Jun-04	10:59:19	0.17	455.92	611.60	3.54	LB
9-Jun-04	10:59:24	0.17	456.61	611.60	3.54	LB
9-Jun-04	10:59:29	0.17	456.51	610.61	3.54	LB
9-Jun-04	10:59:34	0.17	456.21	610.61	3.54	LB
9-Jun-04	11:02:13	0.17	179.77	314.80	3.54	CE NX 181 CO=306
9-Jun-04	11:02:18	0.16	180.07	314.80	3.84	CE NX 181 CO=306
9-Jun-04	11:02:23	0.16	180.16	314.80	3.54	CE NX 181 CO=306
9-Jun-04	11:02:28	0.16	180.07	314.80	3.54	CE NX 181 CO=306
9-Jun-04	11:02:33	0.16	180.26	314.70	3.54	CE NX 181 CO=306
9-Jun-04	11:02:38	0.16	179.77	314.80	3.84	CE NX 181 CO=306

Source Testing And Consulting Services, Inc.



scrubber B

9-Jun-04

RAYNIER

Parameter		O2	NOx	CO	SO2	Comments
Units		%V	ppmV	ppmV	ppmV	
9-Jun-04	11:02:42	0.16	180.16	314.80	3.84	LB
9-Jun-04	11:02:47	0.16	180.26	314.70	3.54	LB
9-Jun-04	11:02:52	0.16	180.16	314.80	3.84	LB
9-Jun-04	11:02:57	0.16	180.16	314.70	3.54	LB
9-Jun-04	11:03:02	0.16	180.66	314.80	3.54	LB
9-Jun-04	11:05:00	0.16	95.25	98.69	3.39	CE NX=95 CO=96
9-Jun-04	11:05:05	0.16	95.05	98.69	3.39	CE NX=95 CO=96
9-Jun-04	11:05:10	0.17	95.05	98.69	3.39	CE NX=95 CO=96
9-Jun-04	11:05:15	0.17	95.25	98.59	3.69	CE NX=95 CO=96
9-Jun-04	11:05:20	0.17	95.25	98.59	3.39	CE NX=95 CO=96
9-Jun-04	11:05:30	0.17	95.05	98.59	3.69	LB
9-Jun-04	11:05:35	0.18	95.15	98.69	3.10	LB
9-Jun-04	11:05:40	0.17	95.15	98.69	3.39	LB
9-Jun-04	11:05:45	0.17	95.25	98.69	3.98	LB
9-Jun-04	11:05:50	0.17	95.15	98.69	3.69	LB
9-Jun-04	11:05:55	0.17	95.05	98.69	3.39	LB
9-Jun-04	11:06:00	0.17	95.25	98.59	3.69	LB
9-Jun-04	11:16:54	0.21	46.47	45.68	3.39	CE CO=46 NX=46.7
9-Jun-04	11:16:59	0.22	46.27	45.68	3.69	CE CO=46 NX=46.7
9-Jun-04	11:17:04	0.21	46.37	45.68	3.69	CE CO=46 NX=46.7
9-Jun-04	11:17:09	0.20	46.27	45.78	3.39	CE CO=46 NX=46.7
9-Jun-04	11:17:14	0.22	46.47	45.78	3.39	CE CO=46 NX=46.7
9-Jun-04	11:17:19	0.21	46.27	45.68	3.39	CE CO=46 NX=46.7
9-Jun-04	11:17:24	0.21	46.47	45.68	3.69	CE CO=46 NX=46.7
9-Jun-04	11:17:29	0.22	46.47	45.78	3.69	CE CO=46 NX=46.7
9-Jun-04	11:17:34	0.22	46.37	45.68	3.39	CE CO=46 NX=46.7
9-Jun-04	11:17:39	0.22	46.37	45.68	3.10	CE CO=46 NX=46.7
9-Jun-04	11:17:44	0.22	46.37	45.78	3.10	CE CO=46 NX=46.7
9-Jun-04	11:17:52	0.21	46.47	45.68	3.39	LB
9-Jun-04	11:17:57	0.22	46.57	45.78	3.69	LB
9-Jun-04	11:18:02	0.22	46.27	45.68	3.69	LB
9-Jun-04	11:18:07	0.22	46.47	45.78	3.39	LB
9-Jun-04	11:18:12	0.22	46.37	45.78	3.69	LB
9-Jun-04	11:23:58	0.24	0.05	100.75	47.06	CE SO2=46.9
9-Jun-04	11:24:03	0.25	0.05	100.75	47.06	CE SO2=46.9
9-Jun-04	11:24:08	0.24	0.05	100.76	47.35	CE SO2=46.9
9-Jun-04	11:24:13	0.24	0.05	100.76	47.06	CE SO2=46.9
9-Jun-04	11:24:17	0.24	0.05	100.76	47.06	LB
9-Jun-04	11:24:22	0.24	0.05	100.76	47.06	LB
9-Jun-04	11:24:27	0.24	-0.05	100.76	47.06	LB
9-Jun-04	11:24:32	0.24	0.15	100.76	47.06	LB
9-Jun-04	11:24:37	0.24	-0.05	100.76	47.35	LB
9-Jun-04	11:24:42	0.24	0.05	100.76	47.06	LB
9-Jun-04	11:28:12	0.24	-1.23	100.76	24.64	CE SO2=24.9



Source Testing And Consulting Services, Inc.



scrubber B

9-Jun-04		RAYNIER				
Parameter		O2	NOx	CO	SO2	Comments
Units		%V	ppmV	ppmV	ppmV	
9-Jun-04	11:28:17	0.24	-1.33	100.76	24.64	CE SO2=24.9
9-Jun-04	11:28:22	0.24	-1.23	100.76	24.64	CE SO2=24.9
9-Jun-04	11:28:30	0.24	-1.33	100.76	24.64	LB
9-Jun-04	11:28:35	0.23	-1.33	100.76	24.64	LB
9-Jun-04	11:28:40	0.24	-1.23	100.76	24.34	LB
9-Jun-04	11:28:45	0.23	-1.23	100.76	24.64	LB
9-Jun-04	11:28:50	0.23	-1.23	100.76	24.93	LB
9-Jun-04	11:28:55	0.23	-1.23	100.76	24.93	LB
9-Jun-04	11:30:31	19.96	-1.33	100.76	3.39	CE O2=19.99
9-Jun-04	11:30:36	19.97	-1.33	100.76	3.69	CE O2=19.99
9-Jun-04	11:30:41	19.97	-1.23	100.76	3.69	CE O2=19.99
9-Jun-04	11:30:46	19.97	-1.33	100.76	3.69	CE O2=19.99
9-Jun-04	11:30:51	19.97	-1.33	100.86	3.39	CE O2=19.99
9-Jun-04	11:30:56	19.97	-1.43	100.76	3.39	CE O2=19.99
9-Jun-04	11:31:01	19.97	-1.33	100.76	3.69	CE O2=19.99
9-Jun-04	11:31:06	19.98	-1.33	100.76	3.39	CE O2=19.99
9-Jun-04	11:31:11	19.98	-1.43	100.76	3.39	CE O2=19.99
9-Jun-04	11:31:16	19.98	-1.33	100.76	3.39	CE O2=19.99
9-Jun-04	11:31:21	19.98	-1.43	100.76	3.39	CE O2=19.99
9-Jun-04	11:31:26	19.98	-1.33	100.86	3.39	CE O2=19.99
9-Jun-04	11:31:31	19.98	-1.33	100.76	3.69	CE O2=19.99
9-Jun-04	11:31:36	19.98	-1.33	100.76	3.69	CE O2=19.99
9-Jun-04	11:31:41	19.98	-1.33	100.76	3.69	CE O2=19.99
9-Jun-04	11:31:46	19.98	-1.43	100.76	3.10	CE O2=19.99
9-Jun-04	11:31:51	19.99	-1.33	100.76	3.39	CE O2=19.99
9-Jun-04	11:31:56	19.92	-1.33	100.76	3.39	CE O2=19.99
9-Jun-04	11:33:08	13.06	-1.33	-0.15	3.39	CE O2=12.97
9-Jun-04	11:33:13	13.06	-1.43	-0.25	3.39	CE O2=12.97
9-Jun-04	11:33:18	13.05	-1.33	-0.05	3.39	CE O2=12.97
9-Jun-04	11:33:23	13.05	-1.33	-0.15	3.69	CE O2=12.97
9-Jun-04	11:33:28	13.05	-1.43	-0.15	3.10	CE O2=12.97
9-Jun-04	11:33:33	13.05	-1.43	-0.15	3.39	CE O2=12.97
9-Jun-04	11:33:38	13.05	-1.33	-0.15	3.39	CE O2=12.97
9-Jun-04	11:33:59	13.05	-1.33	-0.15	3.10	LB
9-Jun-04	11:34:04	13.06	-1.43	-0.15	3.39	LB
9-Jun-04	11:34:09	13.05	-1.43	-0.15	3.39	LB
9-Jun-04	11:34:14	13.06	-1.43	-0.15	3.10	LB
9-Jun-04	11:34:19	13.06	-1.43	-0.15	3.39	LB
9-Jun-04	11:34:24	13.07	-1.43	-0.15	3.39	LB
9-Jun-04	11:36:41	12.13	70.56	253.00	3.69	RT
9-Jun-04	11:36:46	12.29	69.19	252.90	3.69	RT
9-Jun-04	11:39:05	19.85	-1.13	13.82	3.69	LB O2=19.99
9-Jun-04	11:39:10	19.87	-1.23	-0.15	3.69	LB O2=19.99
9-Jun-04	11:39:15	19.88	-1.13	-0.05	3.39	LB O2=19.99

Source Testing And Consulting Services, Inc.



scrubber B

9-Jun-04		RAYNIER				
	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
9-Jun-04	11:39:20	19.89	-1.23	-0.15	3.39	LB O2=19.99
9-Jun-04	11:39:25	19.89	-1.23	-0.15	3.39	LB O2=19.99
9-Jun-04	11:39:30	19.89	-1.23	-0.15	3.39	LB O2=19.99
9-Jun-04	11:39:35	19.89	-1.23	-0.05	3.69	LB O2=19.99
9-Jun-04	11:39:40	19.90	-1.23	-0.05	3.69	LB O2=19.99
9-Jun-04	11:39:45	19.90	-1.33	-0.15	3.39	LB O2=19.99
9-Jun-04	11:39:50	19.90	-1.23	-0.05	3.39	LB O2=19.99
9-Jun-04	11:39:55	19.90	-1.33	-0.15	3.39	LB O2=19.99
9-Jun-04	11:40:00	19.90	-1.23	-0.15	3.69	LB O2=19.99
9-Jun-04	11:40:05	19.91	-1.23	-0.05	3.10	LB O2=19.99
9-Jun-04	11:40:10	19.91	-1.23	-0.05	3.69	LB O2=19.99
9-Jun-04	11:40:15	19.91	-1.33	-0.15	3.69	LB O2=19.99
9-Jun-04	11:40:20	19.91	-1.23	-0.15	3.69	LB O2=19.99
9-Jun-04	11:43:45	12.17	69.68	225.66	3.69	RT
9-Jun-04	11:43:50	12.21	69.97	217.69	3.69	RT
9-Jun-04	11:43:55	12.30	72.33	217.69	3.69	RT
9-Jun-04	11:44:00	12.41	71.55	206.68	3.39	RT
9-Jun-04	11:44:05	12.35	72.33	206.58	3.10	RT
9-Jun-04	11:44:10	12.24	73.71	197.82	3.39	RT
9-Jun-04	11:44:15	12.31	73.81	197.72	3.69	RT
9-Jun-04	11:44:20	12.40	73.31	193.79	3.69	RT
9-Jun-04	11:44:25	12.42	72.53	193.79	3.69	RT
9-Jun-04	11:44:30	12.31	72.53	190.74	3.69	RT
9-Jun-04	11:44:35	12.30	73.22	190.74	3.69	RT
9-Jun-04	11:44:40	12.38	74.10	191.72	3.69	RT
9-Jun-04	11:44:45	12.57	74.49	191.72	4.28	RT
9-Jun-04	11:44:50	12.66	35.16	193.69	3.69	RT
9-Jun-04	11:44:55	12.70	-0.15	193.79	4.28	RT
9-Jun-04	11:45:00	18.07	-0.74	144.91	3.69	RT
9-Jun-04	11:45:05	19.60	-1.03	144.91	3.39	RT
9-Jun-04	11:45:10	19.83	-0.93	64.86	3.39	RT
9-Jun-04	11:45:15	19.88	-1.03	64.86	3.39	RT
9-Jun-04	11:45:20	19.89	-1.03	15.78	3.39	RT
9-Jun-04	11:45:25	19.90	-1.13	15.69	3.39	RT
9-Jun-04	11:45:30	19.90	-1.13	1.92	3.39	RT
9-Jun-04	11:45:35	19.91	-1.23	1.92	3.69	RT
9-Jun-04	11:45:40	19.91	-1.13	-0.05	3.39	RT
9-Jun-04	11:45:45	19.92	-1.23	-0.05	3.39	RT
9-Jun-04	11:45:50	19.93	-1.33	-0.05	3.10	RT
9-Jun-04	11:45:55	19.91	-1.13	0.05	3.39	RT
9-Jun-04	11:46:00	19.92	67.02	2.90	3.39	RT
9-Jun-04	11:46:05	17.55	71.54	2.90	3.39	RT
9-Jun-04	11:46:10	13.55	71.94	58.76	3.69	RT
9-Jun-04	11:46:15	12.88	71.05	58.76	3.39	RT

Source Testing And Consulting Services, Inc.



scrubber B

9-Jun-04

RAYNIER

Parameter		O2	NOx	CO	SO2	Comments
Units		%V	ppmV	ppmV	ppmV	
9-Jun-04	11:46:20	12.55	72.72	139.70	3.69	RT
9-Jun-04	11:46:25	12.33	74.00	139.70	3.98	RT
9-Jun-04	11:46:30	12.20	75.38	179.72	3.69	RT
9-Jun-04	11:46:35	12.26	75.08	179.72	3.98	RT
9-Jun-04	11:46:40	12.44	74.99	190.74	4.28	RT
9-Jun-04	11:46:45	12.50	74.69	190.74	3.98	RT
9-Jun-04	11:46:50	12.53	74.99	194.77	3.98	RT
9-Jun-04	11:46:55	12.54	53.74	194.77	4.28	RT
9-Jun-04	11:47:00	12.45	0.05	183.75	4.28	RT
9-Jun-04	11:47:05	18.30	-0.84	183.66	3.98	RT
9-Jun-04	11:47:10	19.62	-1.03	110.88	3.69	RT
9-Jun-04	11:47:15	19.82	-1.03	110.88	3.69	RT
9-Jun-04	11:47:20	19.88	-1.13	39.78	3.39	RT
9-Jun-04	11:47:25	19.90	-1.13	39.78	3.69	RT
9-Jun-04	11:47:30	19.91	-1.23	7.92	3.69	RT
9-Jun-04	11:47:35	19.92	-1.13	7.92	3.39	RT
9-Jun-04	11:47:40	19.92	-1.23	-0.05	3.39	RT
9-Jun-04	11:47:45	19.92	-1.23	-0.05	3.39	RT
9-Jun-04	11:47:50	19.93	-1.23	-0.05	3.39	RT
9-Jun-04	11:47:55	19.93	-1.23	-0.15	3.10	RT
9-Jun-04	11:48:00	19.93	-1.23	-0.15	3.39	RT
9-Jun-04	11:48:05	19.93	-1.23	-0.15	3.39	RT
9-Jun-04	11:48:10	19.93	-1.13	-0.05	3.39	RT
9-Jun-04	11:48:15	19.94	-1.23	-0.05	3.39	RT
9-Jun-04	11:48:20	19.94	-1.33	-0.05	3.69	RT
9-Jun-04	11:48:25	19.94	-1.33	-0.05	3.39	RT
9-Jun-04	11:48:30	19.94	-1.23	-0.15	3.39	RT
9-Jun-04	11:48:35	19.94	-1.33	-0.05	3.39	RT
9-Jun-04	11:48:40	19.94	-1.23	-0.05	3.69	RT
9-Jun-04	11:48:45	19.94	-1.23	-0.05	1.03	RT
9-Jun-04	11:48:50	19.94	-1.33	-0.05	-0.44	RT
9-Jun-04	11:48:55	19.94	-1.23	-0.05	-0.15	RT
9-Jun-04	11:49:00	19.94	-1.23	-0.15	-0.15	RT
9-Jun-04	11:49:05	19.95	-1.23	-0.05	-0.15	RT
9-Jun-04	11:49:10	19.93	58.86	2.90	0.15	RT
9-Jun-04	11:49:15	15.76	64.76	3.00	-0.74	RT
9-Jun-04	11:49:20	12.18	68.20	67.71	-0.15	RT
9-Jun-04	11:49:25	11.77	69.38	67.71	-0.15	RT
9-Jun-04	11:49:30	11.77	70.56	156.81	-0.15	RT
9-Jun-04	11:49:35	11.90	71.54	156.91	-0.15	RT
9-Jun-04	11:49:40	12.03	72.23	200.67	-0.15	RT
9-Jun-04	11:49:45	12.13	72.23	200.67	-0.15	RT
9-Jun-04	11:49:50	12.10	72.82	205.59	0.15	RT
9-Jun-04	11:49:55	12.09	73.51	205.68	0.15	RT

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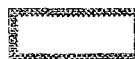


scrubber B

9-Jun-04 RAYNIER

Parameter	O2	NOx	CO	SO2	Comments
Units	%V	ppmV	ppmV	ppmV	
9-Jun-04 11:50:00	12.19	73.41	201.65	0.15	RT
9-Jun-04 11:50:05	12.18	75.08	201.65	0.15	RT
9-Jun-04 11:50:10	12.17	75.38	197.82	-0.15	RT
9-Jun-04 11:50:15	12.17	74.30	197.82	-0.15	RT
9-Jun-04 11:50:20	12.13	74.30	189.75	0.15	RT
9-Jun-04 11:50:25	12.13	74.49	189.75	0.44	RT
9-Jun-04 11:50:30	12.25	72.82	179.72	0.44	RT
9-Jun-04 11:50:35	12.41	5.85	179.72	0.44	RT
9-Jun-04 11:50:40	15.12	-0.64	154.84	0.74	RT
9-Jun-04 11:50:45	19.20	-0.84	154.74	0.44	RT
9-Jun-04 11:50:50	19.78	-1.03	82.66	0.44	RT
9-Jun-04 11:50:55	19.88	-1.13	82.66	0.15	RT
9-Jun-04 11:51:00	19.90	-1.23	25.82	0.44	RT
9-Jun-04 11:51:05	19.91	-1.23	25.82	0.44	RT
9-Jun-04 11:51:10	19.91	-1.23	3.88	0.15	RT
9-Jun-04 11:51:15	19.92	-1.13	3.88	0.15	RT
9-Jun-04 11:51:20	19.92	-1.13	-0.15	0.15	RT
9-Jun-04 11:51:25	19.92	-1.33	-0.15	0.44	RT
9-Jun-04 11:51:30	19.93	-1.23	-0.05	0.15	RT
9-Jun-04 11:51:35	19.92	-1.13	-0.05	0.15	RT
9-Jun-04 11:51:40	19.93	-1.23	0.15	0.15	RT
9-Jun-04 11:51:45	19.92	8.31	-0.05	0.15	RT
9-Jun-04 11:51:50	18.03	43.12	25.91	0.15	RT
9-Jun-04 11:51:55	12.49	49.22	25.91	0.15	RT
9-Jun-04 11:52:00	11.43	50.50	228.70	0.15	RT
9-Jun-04 11:52:05	11.27	40.07	228.80	0.44	RT
9-Jun-04 11:52:10	11.08	50.30	421.74	0.44	RT
9-Jun-04 11:52:16	11.03	56.30	421.84	0.44	RT
9-Jun-04 11:52:21	11.25	29.95	602.60	0.44	RT
9-Jun-04 11:52:26	10.96	27.88	602.60	0.44	RT
9-Jun-04 11:52:32	10.80	29.75	999.31	0.44	RT
9-Jun-04 11:52:37	10.63	27.29	999.31	0.74	RT
9-Jun-04 11:52:42	10.58	27.29	999.31	0.44	RT
9-Jun-04 11:52:47	10.58	25.23	999.41	0.44	RT
9-Jun-04 11:52:52	10.50	23.36	999.31	0.44	RT
9-Jun-04 11:52:57	10.43	24.54	999.41	0.44	RT
9-Jun-04 11:53:02	10.42	26.11	999.41	0.74	RT
9-Jun-04 11:53:07	10.44	24.34	999.31	0.44	RT
9-Jun-04 11:53:12	10.46	27.19	999.41	0.44	RT
9-Jun-04 11:53:17	10.51	25.72	999.41	0.44	RT
9-Jun-04 11:53:22	10.55	28.47	999.31	0.15	RT
9-Jun-04 11:53:27	10.61	32.01	999.31	0.44	RT
9-Jun-04 11:53:32	10.68	35.65	999.31	0.44	RT
9-Jun-04 11:53:37	10.76	30.54	999.31	0.15	RT

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scrubber B

9-Jun-04 RAYNIER

Parameter		O2	NOx	CO	SO2	Comments
Units		%V	ppmV	ppmV	ppmV	
9-Jun-04	11:53:42	10.75	32.40	999.31	0.44	RT
9-Jun-04	11:53:47	10.72	31.42	999.31	0.44	RT
9-Jun-04	11:53:52	10.73	27.29	999.31	0.44	RT
9-Jun-04	11:53:57	10.69	29.85	999.31	0.74	RT
9-Jun-04	11:54:02	10.65	27.09	999.31	0.44	RT
9-Jun-04	11:54:07	10.62	26.11	999.31	0.44	RT
9-Jun-04	11:54:12	10.59	31.91	999.31	0.44	RT
9-Jun-04	11:54:17	10.67	34.27	999.31	0.44	RT
9-Jun-04	11:54:22	10.73	30.44	999.31	0.44	RT
9-Jun-04	11:54:27	10.66	37.12	999.41	0.44	RT
9-Jun-04	11:54:32	10.65	38.21	999.31	0.15	RT
9-Jun-04	11:54:37	10.67	38.01	999.31	0.15	RT
9-Jun-04	11:54:42	10.75	36.93	999.31	0.15	RT
9-Jun-04	11:54:47	10.78	36.73	999.31	0.15	RT
9-Jun-04	11:54:52	8.09	462.65	954.47	0.44	RT
9-Jun-04	11:54:57	1.20	470.03	954.47	0.44	RT
9-Jun-04	11:55:02	0.42	471.80	771.65	0.44	RT
9-Jun-04	11:55:07	0.33	472.88	771.65	0.44	RT
9-Jun-04	11:55:12	0.32	473.28	679.60	0.15	RT
9-Jun-04	11:55:17	0.31	474.06	679.60	0.15	RT
9-Jun-04	11:55:22	0.31	473.37	632.79	0.44	RT
9-Jun-04	11:55:27	0.31	473.87	632.79	0.15	RT
9-Jun-04	11:55:32	0.30	473.77	614.59	-0.15	RT
9-Jun-04	11:55:37	0.30	473.96	614.50	0.15	RT
9-Jun-04	11:55:42	0.30	473.87	609.48	0.15	RT
9-Jun-04	11:55:47	0.30	474.06	609.58	0.15	RT
9-Jun-04	11:55:52	0.30	473.67	609.58	0.15	RT
9-Jun-04	11:55:57	0.30	473.96	609.48	0.15	RT
9-Jun-04	11:56:02	0.30	473.47	611.55	0.15	RT
9-Jun-04	11:56:07	0.30	473.57	611.55	0.15	RT
9-Jun-04	11:56:12	0.30	473.87	609.58	0.15	RT
9-Jun-04	11:56:17	0.30	474.26	609.58	0.15	RT
9-Jun-04	11:56:22	0.30	473.67	610.56	0.15	RT
9-Jun-04	11:56:27	0.30	473.57	610.56	0.44	RT
9-Jun-04	11:56:32	0.30	473.18	610.56	0.15	RT
9-Jun-04	11:56:37	0.30	473.67	610.56	0.44	RT
9-Jun-04	11:56:42	0.30	473.77	611.55	0.44	RT
9-Jun-04	11:56:47	0.30	473.47	611.55	0.15	RT
9-Jun-04	11:56:52	0.29	473.96	609.48	0.15	RT
9-Jun-04	11:56:57	0.59	473.77	609.48	0.44	RT
9-Jun-04	11:57:02	0.55	473.18	613.61	0.15	RT
9-Jun-04	11:57:07	0.37	473.37	613.61	0.15	RT
9-Jun-04	11:57:12	0.31	463.05	609.58	0.15	RT
9-Jun-04	11:57:17	0.30	458.13	609.58	0.15	RT

Source Testing And Consulting Services, Inc.



scrubber B

9-Jun-04		RAYNIER				
Parameter		O2	NOx	CO	SO2	Comments
Units		%V	ppmV	ppmV	ppmV	
9-Jun-04	11:57:22	0.32	416.04	612.63	0.15	RT
9-Jun-04	11:57:27	0.29	69.87	612.63	0.15	RT
9-Jun-04	11:57:32	0.89	58.27	548.80	-0.15	RT
9-Jun-04	11:57:37	8.68	58.66	548.80	0.15	RT
9-Jun-04	11:57:42	11.38	57.68	381.82	-0.15	RT
9-Jun-04	11:57:47	11.99	57.28	381.92	0.15	RT
9-Jun-04	11:57:52	12.11	56.20	259.87	0.44	RT
9-Jun-04	11:57:57	12.17	55.32	259.87	0.15	RT
9-Jun-04	11:58:02	12.23	54.83	211.59	0.74	RT
9-Jun-04	11:58:07	12.36	55.51	211.59	0.44	RT
9-Jun-04	11:58:12	12.51	56.69	203.52	0.15	RT
9-Jun-04	11:58:17	12.82	57.58	203.52	0.15	RT
9-Jun-04	11:58:22	13.04	57.68	211.59	0.44	RT
9-Jun-04	11:58:27	13.15	57.38	211.59	0.15	RT
9-Jun-04	11:58:32	13.23	57.97	225.75	0.74	RT
9-Jun-04	11:58:37	13.29	58.27	225.65	0.44	RT
9-Jun-04	11:58:42	13.30	57.78	238.92	0.44	RT
9-Jun-04	11:58:47	13.41	57.97	238.92	0.44	RT
9-Jun-04	11:58:52	13.43	57.78	246.89	0.74	RT
9-Jun-04	11:58:57	13.43	58.07	246.99	0.74	RT
9-Jun-04	11:59:02	13.44	57.68	246.99	0.44	RT
9-Jun-04	11:59:07	12.99	439.25	246.99	0.44	RT
9-Jun-04	11:59:12	3.34	452.62	263.02	0.15	RT
9-Jun-04	11:59:17	0.69	454.39	262.92	0.15	RT
9-Jun-04	11:59:22	0.36	455.08	401.78	0.44	RT
9-Jun-04	11:59:27	0.31	455.97	401.78	0.44	RT
9-Jun-04	11:59:32	0.30	456.07	527.76	0.44	RT
9-Jun-04	11:59:37	0.30	455.77	527.66	0.44	RT
9-Jun-04	11:59:42	0.30	456.16	592.66	0.15	RT
9-Jun-04	11:59:47	0.30	456.26	592.66	0.44	RT
9-Jun-04	11:59:52	0.30	456.07	610.46	0.44	RT
9-Jun-04	11:59:57	0.29	456.16	610.46	0.15	RT
9-Jun-04	12:00:02	0.30	389.68	608.60	0.15	RT
9-Jun-04	12:00:07	0.29	51.88	608.60	0.15	RT
9-Jun-04	12:00:12	6.37	55.61	556.77	0.44	RT
9-Jun-04	12:00:17	10.29	58.56	556.77	0.44	RT
9-Jun-04	12:00:22	11.06	59.55	472.59	0.44	RT
9-Jun-04	12:00:27	11.32	59.74	472.69	0.15	RT
9-Jun-04	12:00:32	11.40	60.04	372.97	0.44	RT
9-Jun-04	12:00:37	11.43	55.22	372.97	0.15	RT
9-Jun-04	12:00:42	11.38	43.71	304.81	0.44	RT
9-Jun-04	12:00:47	11.20	39.29	304.72	0.74	RT
9-Jun-04	12:00:52	10.98	49.61	392.83	0.74	RT
9-Jun-04	12:00:57	11.49	53.35	392.83	0.44	RT

Source Testing And Consulting Services, Inc.



scrubber B

9-Jun-04		RAYNIER				Comments
Parameter		O2	NOx	CO	SO2	
Units		%V	ppmV	ppmV	ppmV	
9-Jun-04	12:01:02	12.06	54.63	501.01	0.74	RT
9-Jun-04	12:01:07	12.43	55.32	500.91	0.44	RT
9-Jun-04	12:01:12	12.62	56.10	430.69	0.44	RT
9-Jun-04	12:01:17	12.75	57.68	430.69	0.74	RT
9-Jun-04	12:01:22	12.75	57.68	302.75	0.44	RT
9-Jun-04	12:01:27	12.83	57.38	302.65	0.44	RT
9-Jun-04	12:01:32	12.81	55.91	241.87	0.15	RT
9-Jun-04	12:01:37	12.77	56.10	241.97	0.15	RT
9-Jun-04	12:01:42	12.85	54.92	225.65	0.44	RT
9-Jun-04	12:01:47	12.87	55.12	225.65	0.74	RT
9-Jun-04	12:01:52	12.86	55.02	223.58	0.15	RT
9-Jun-04	12:01:57	12.79	55.12	223.58	0.15	RT
9-Jun-04	12:02:02	12.81	55.42	223.58	0.44	RT
9-Jun-04	12:02:07	12.92	55.42	223.58	0.44	RT
9-Jun-04	12:02:12	13.00	55.51	225.65	0.44	RT
9-Jun-04	12:02:17	13.06	55.22	225.65	0.15	RT
9-Jun-04	12:02:22	12.49	438.56	226.63	0.74	RT
9-Jun-04	12:02:27	3.47	451.35	226.63	0.15	RT
9-Jun-04	12:02:32	0.62	453.80	309.73	0.15	RT
9-Jun-04	12:02:37	0.34	454.59	309.83	-0.15	RT
9-Jun-04	12:02:42	0.31	454.69	464.62	0.15	RT
9-Jun-04	12:02:47	0.30	455.77	464.72	0.44	RT
9-Jun-04	12:02:52	0.30	455.67	564.73	0.44	RT
9-Jun-04	12:02:57	0.30	455.87	564.83	0.44	RT
9-Jun-04	12:03:02	0.30	455.97	602.60	0.15	RT
9-Jun-04	12:03:07	0.29	456.36	602.50	0.44	RT
9-Jun-04	12:03:12	0.29	456.66	610.46	0.44	RT
9-Jun-04	12:03:17	0.29	456.07	610.56	0.44	RT
9-Jun-04	12:03:22	0.29	456.46	611.55	0.15	RT
9-Jun-04	12:03:27	0.29	456.66	611.45	0.44	RT
9-Jun-04	12:03:32	0.29	456.36	608.60	0.44	RT
9-Jun-04	12:03:37	0.29	456.36	608.60	-0.15	RT
9-Jun-04	12:03:42	0.29	456.36	612.63	0.44	RT
9-Jun-04	12:03:47	0.29	456.36	612.63	0.44	RT
9-Jun-04	12:03:52	0.29	456.75	609.58	0.44	RT
9-Jun-04	12:03:57	0.29	456.36	609.58	-0.15	RT
9-Jun-04	12:04:02	0.29	456.46	609.58	-0.15	RT
9-Jun-04	12:04:07	0.29	456.16	609.58	0.15	RT
9-Jun-04	12:04:12	0.29	456.56	605.55	0.15	RT
9-Jun-04	12:04:17	0.30	167.23	605.55	0.15	RT
9-Jun-04	12:04:22	0.31	68.40	590.50	-0.15	RT
9-Jun-04	12:04:27	8.02	65.15	590.50	0.15	RT
9-Jun-04	12:04:32	11.58	63.87	422.73	0.15	RT
9-Jun-04	12:04:37	12.29	63.28	422.83	0.15	RT

Source Testing And Consulting Services, Inc.



scrubber B

9-Jun-04		RAYNIER				
Parameter		O2	NOx	CO	SO2	Comments
Units		%V	ppmV	ppmV	ppmV	
9-Jun-04	12:04:42	12.34	62.01	234.89	0.15	RT
9-Jun-04	12:04:47	12.42	61.22	234.89	0.15	RT
9-Jun-04	12:04:52	12.53	60.63	136.84	0.44	RT
9-Jun-04	12:04:57	12.56	59.55	136.84	0.15	RT
9-Jun-04	12:05:02	12.70	59.45	106.85	0.44	RT
9-Jun-04	12:05:07	12.86	59.25	106.85	0.44	RT
9-Jun-04	12:05:12	12.86	58.66	101.74	0.15	RT
9-Jun-04	12:05:17	12.94	58.27	101.74	0.44	RT
9-Jun-04	12:05:22	13.10	58.46	98.59	0.44	RT
9-Jun-04	12:05:27	13.18	58.96	98.59	0.44	RT
9-Jun-04	12:05:32	13.19	59.25	92.69	0.15	RT
9-Jun-04	12:26:39	11.44	50.89	99.67	1.03	
9-Jun-04	12:27:59	11.34	50.20	289.07	1.03	SCRUBBER B RUN 1
9-Jun-04	12:28:59	11.78	55.22	101.83	0.44	SCRUBBER B RUN 1
9-Jun-04	12:29:59	11.70	55.22	93.86	0.74	SCRUBBER B RUN 1
9-Jun-04	12:30:59	11.52	55.61	106.06	1.03	SCRUBBER B RUN 1
9-Jun-04	12:31:59	11.70	54.82	100.85	0.74	SCRUBBER B RUN 1
9-Jun-04	12:32:59	11.87	52.37	91.70	0.44	SCRUBBER B RUN 1
9-Jun-04	12:33:59	11.51	50.30	97.80	0.74	SCRUBBER B RUN 1
9-Jun-04	12:34:59	11.77	51.97	77.83	1.03	SCRUBBER B RUN 1
9-Jun-04	12:35:59	11.80	55.61	73.70	0.74	SCRUBBER B RUN 1
9-Jun-04	12:36:59	11.53	54.04	81.87	0.74	SCRUBBER B RUN 1
9-Jun-04	12:37:59	11.14	51.19	98.78	0.15	SCRUBBER B RUN 1
9-Jun-04	12:38:59	11.21	48.43	129.07	0.44	SCRUBBER B RUN 1
9-Jun-04	12:39:59	10.87	16.67	186.79	0.74	SCRUBBER B RUN 1
9-Jun-04	12:40:59	11.14	53.84	132.02	0.74	SCRUBBER B RUN 1
9-Jun-04	12:41:59	11.54	54.82	110.98	0.44	SCRUBBER B RUN 1
9-Jun-04	12:42:59	11.32	54.82	129.07	0.74	SCRUBBER B RUN 1
9-Jun-04	12:43:59	11.27	56.50	143.82	0.74	SCRUBBER B RUN 1
9-Jun-04	12:44:59	11.01	46.76	154.93	0.74	SCRUBBER B RUN 1
9-Jun-04	12:45:59	11.54	57.09	114.02	0.74	SCRUBBER B RUN 1
9-Jun-04	12:46:59	11.90	54.63	99.76	0.44	SCRUBBER B RUN 1
9-Jun-04	12:47:59	11.31	55.91	101.83	1.03	SCRUBBER B RUN 1
9-Jun-04	12:48:59	11.49	59.05	99.76	0.44	SCRUBBER B RUN 1
9-Jun-04	12:49:59	11.70	57.97	101.83	0.74	SCRUBBER B RUN 1
9-Jun-04	12:50:59	10.70	41.94	198.79	0.44	SCRUBBER B RUN 1
9-Jun-04	12:51:59	10.59	41.06	445.82	0.44	SCRUBBER B RUN 1
9-Jun-04	12:52:59	11.54	59.15	104.98	1.03	SCRUBBER B RUN 1
9-Jun-04	12:53:59	11.29	49.12	110.98	0.44	SCRUBBER B RUN 1
9-Jun-04	12:54:59	11.20	53.45	192.89	0.74	SCRUBBER B RUN 1
9-Jun-04	12:55:59	11.37	53.94	165.95	0.74	SCRUBBER B RUN 1
9-Jun-04	12:57:10	11.74	55.71	147.85	0.44	SCRUBBER B RUN 1
9-Jun-04	12:58:10	10.69	30.34	350.72	1.03	SCRUBBER B RUN 1
9-Jun-04	12:59:10	10.10	21.00	999.36	0.74	SCRUBBER B RUN 1



Source Testing And Consulting Services, Inc.



scrubber B

9-Jun-04		RAYNIER				Comments
Parameter	O2	NOx	CO	SO2		
Units	%V	ppmV	ppmV	ppmV		
9-Jun-04	13:00:10	11.33	52.07	121.10	0.74	SCRUBBER B RUN 1
9-Jun-04	13:01:10	12.15	54.04	81.77	1.03	SCRUBBER B RUN 1
9-Jun-04	13:02:10	12.04	15.39	72.82	1.03	SCRUBBER B RUN 1
9-Jun-04	13:03:10	11.87	52.96	80.88	1.03	SCRUBBER B RUN 1
9-Jun-04	13:04:10	11.23	52.32	126.95	0.89	SCRUBBER B RUN 1
9-Jun-04	13:05:10	11.37	55.56	98.73	1.18	SCRUBBER B RUN 1
9-Jun-04	13:06:10	11.45	54.18	95.68	0.89	SCRUBBER B RUN 1
9-Jun-04	13:07:10	11.44	54.68	103.75	0.89	SCRUBBER B RUN 1
9-Jun-04	13:08:10	11.40	53.20	101.78	0.89	SCRUBBER B RUN 1
9-Jun-04	13:09:10	11.37	54.09	140.92	0.59	SCRUBBER B RUN 1
9-Jun-04	13:10:10	11.95	57.04	101.78	0.89	SCRUBBER B RUN 1
9-Jun-04	13:11:10	11.90	58.51	85.85	1.18	SCRUBBER B RUN 1
9-Jun-04	13:12:10	12.31	59.59	87.72	0.89	SCRUBBER B RUN 1
9-Jun-04	13:13:10	11.82	58.41	83.69	0.89	SCRUBBER B RUN 1
9-Jun-04	13:14:10	12.38	60.38	82.70	0.59	SCRUBBER B RUN 1
9-Jun-04	13:15:10	11.82	60.08	89.78	1.18	SCRUBBER B RUN 1
9-Jun-04	13:16:10	11.16	55.17	118.01	0.89	SCRUBBER B RUN 1
9-Jun-04	13:17:10	11.84	58.61	105.03	1.18	SCRUBBER B RUN 1
9-Jun-04	13:18:10	11.35	59.10	111.02	0.59	SCRUBBER B RUN 1
9-Jun-04	13:19:10	11.50	59.89	94.80	1.18	SCRUBBER B RUN 1
9-Jun-04	13:20:10	11.67	60.87	107.88	0.89	SCRUBBER B RUN 1
9-Jun-04	13:21:10	13.32	56.84	83.78	0.89	SCRUBBER STOPPED R
9-Jun-04	13:49:28	11.61	63.63	112.01	1.77	Test WILL CONTI
9-Jun-04	13:50:28	12.12	66.09	119.98	1.77	Test
9-Jun-04	13:51:28	12.21	65.00	106.01	1.18	Test
9-Jun-04	13:52:28	12.11	66.48	101.88	1.18	Test
9-Jun-04	13:53:28	12.23	67.27	100.80	1.48	Test
9-Jun-04	13:54:28	12.27	68.45	103.75	1.77	Test
9-Jun-04	13:55:28	12.05	65.69	96.87	1.77	Test
9-Jun-04	13:56:28	11.53	62.55	119.00	1.48	Test
9-Jun-04	14:03:10	0.27	181.44	313.81	1.48	POST R1 CO=306 NX=18
9-Jun-04	14:03:15	0.27	181.44	313.91	1.77	POST R1 CO=306 NX=18
9-Jun-04	14:03:20	0.27	181.74	313.81	2.07	POST R1 CO=306 NX=18
9-Jun-04	14:03:25	0.27	181.93	313.81	1.77	POST R1 CO=306 NX=18
9-Jun-04	14:03:30	0.27	181.93	313.91	2.07	POST R1 CO=306 NX=18
9-Jun-04	14:03:35	0.27	181.84	313.81	1.77	POST R1 CO=306 NX=18
9-Jun-04	14:03:40	0.27	181.84	313.81	1.77	POST R1 CO=306 NX=18
9-Jun-04	14:03:45	0.27	181.74	313.81	1.77	POST R1 CO=306 NX=18
9-Jun-04	14:05:30	0.27	95.64	98.69	1.33	CO=96.8 NX=95
9-Jun-04	14:05:35	0.27	95.74	98.79	1.62	CO=96.8 NX=95
9-Jun-04	14:05:40	0.26	95.54	98.69	1.03	CO=96.8 NX=95
9-Jun-04	14:05:45	0.26	95.74	98.79	1.33	CO=96.8 NX=95
9-Jun-04	14:05:50	0.05	95.64	98.69	1.33	CO=96.8 NX=95
9-Jun-04	14:05:55	0.03	95.74	98.69	1.92	CO=96.8 NX=95

Source Testing And Consulting Services, Inc.



scrubber B

9-Jun-04		RAYNIER				Comments
Parameter	O2	NOx	CO	SO2		
Units	%V	ppmV	ppmV	ppmV		
9-Jun-04	14:06:00	0.03	95.84	98.79	1.92	CO=96.8 NX=95
9-Jun-04	14:07:37	12.99	-1.03	0.05	1.03	O2=12.97
9-Jun-04	14:07:42	12.99	-1.13	-0.05	1.33	O2=12.97
9-Jun-04	14:07:47	12.99	-1.03	-0.05	1.62	O2=12.97
9-Jun-04	14:07:52	12.99	-1.03	0.05	1.92	O2=12.97
9-Jun-04	14:07:57	12.99	-1.03	-0.05	1.62	O2=12.97
9-Jun-04	14:08:02	12.99	-1.03	-0.05	2.21	O2=12.97
9-Jun-04	14:14:34	0.06	-1.13	-0.15	24.63	SO2=24.9
9-Jun-04	14:14:39	0.05	-1.13	-0.05	24.63	SO2=24.9
9-Jun-04	14:14:44	0.05	-1.23	0.05	24.93	SO2=24.9
9-Jun-04	14:14:49	0.05	-1.23	0.05	24.63	SO2=24.9
9-Jun-04	14:14:54	0.05	-1.23	-0.05	24.63	SO2=24.9
9-Jun-04	14:14:59	0.04	-1.23	-0.05	24.63	SO2=24.9
9-Jun-04	14:16:38	12.99	-1.23	-0.05	0.44	O2=12.97
9-Jun-04	14:16:42	12.99	-1.33	-0.05	0.15	O2=12.97
9-Jun-04	14:16:47	12.99	-1.33	-0.05	0.15	O2=12.97
9-Jun-04	15:00:25	12.89	0.05	41.94	0.74	SCRUBBER B RUN 2
9-Jun-04	15:02:27	13.25	52.85	101.82	0.74	SCRUBBER B RUN 2
9-Jun-04	15:03:27	13.37	53.74	109.99	0.74	SCRUBBER B RUN 2
9-Jun-04	15:04:27	13.94	52.62	91.66	0.59	SCRUBBER B RUN 2
9-Jun-04	15:05:27	13.40	54.09	85.76	0.30	SCRUBBER B RUN 2
9-Jun-04	15:06:27	13.73	53.50	92.74	0.59	SCRUBBER B RUN 2
9-Jun-04	15:07:27	14.10	54.68	101.79	0.59	SCRUBBER B RUN 2
9-Jun-04	15:08:27	14.33	51.63	101.69	0.30	SCRUBBER B RUN 2
9-Jun-04	15:09:27	13.93	53.70	105.92	0.30	SCRUBBER B RUN 2
9-Jun-04	15:10:27	14.25	52.12	110.94	0.30	SCRUBBER B RUN 2
9-Jun-04	15:11:27	14.14	54.78	109.95	0.30	SCRUBBER B RUN 2
9-Jun-04	15:12:27	13.88	55.76	110.94	0.00	SCRUBBER B RUN 2
9-Jun-04	15:13:27	13.22	55.76	108.97	0.59	SCRUBBER B RUN 2
9-Jun-04	15:14:27	12.98	57.93	90.68	0.00	SCRUBBER B RUN 2
9-Jun-04	15:15:27	12.93	58.12	97.76	0.59	SCRUBBER B RUN 2
9-Jun-04	15:16:27	13.02	57.83	96.77	0.30	SCRUBBER B RUN 2
9-Jun-04	15:17:27	13.03	57.53	88.81	0.00	SCRUBBER B RUN 2
9-Jun-04	15:18:27	12.83	57.73	89.69	0.30	SCRUBBER B RUN 2
9-Jun-04	15:19:27	12.48	59.21	99.72	0.59	SCRUBBER B RUN 2
9-Jun-04	15:20:27	12.55	62.94	114.87	0.30	SCRUBBER B RUN 2
9-Jun-04	15:21:27	11.35	54.29	129.03	0.30	SCRUBBER B RUN 2
9-Jun-04	15:22:27	10.65	48.09	432.83	0.00	SCRUBBER B RUN 2
9-Jun-04	15:23:27	11.51	64.52	348.84	0.59	SCRUBBER B RUN 2
9-Jun-04	15:24:27	10.87	62.10	412.99	0.74	SCRUBBER B RUN 2
9-Jun-04	15:25:27	11.18	55.91	178.84	0.15	SCRUBBER B RUN 2
9-Jun-04	15:26:27	11.49	65.84	121.01	0.44	SCRUBBER B RUN 2
9-Jun-04	15:27:27	11.67	62.60	107.93	0.15	SCRUBBER B RUN 2
9-Jun-04	15:28:27	11.90	63.97	111.96	0.44	SCRUBBER B RUN 2

Source Testing And Consulting Services, Inc.



scrubber B

9-Jun-04		RAYNIER				
Parameter		O2	NOx	CO	SO2	Comments
Units		%V	ppmV	ppmV	ppmV	
9-Jun-04	15:29:27	12.07	64.37	101.74	0.44	SCRUBBER B RUN 2
9-Jun-04	15:30:27	12.22	63.58	110.98	0.44	SCRUBBER B RUN 2
9-Jun-04	15:31:27	12.12	63.38	110.98	0.44	SCRUBBER B RUN 2
9-Jun-04	15:32:27	12.61	63.28	104.98	0.44	SCRUBBER B RUN 2
9-Jun-04	15:33:27	12.43	65.74	92.79	0.44	SCRUBBER B RUN 2
9-Jun-04	15:34:27	12.57	65.55	103.70	0.15	SCRUBBER B RUN 2
9-Jun-04	15:35:27	12.33	66.92	107.05	0.44	SCRUBBER B RUN 2
9-Jun-04	15:36:27	13.00	61.71	110.98	0.74	SCRUBBER B RUN 2
9-Jun-04	15:37:27	12.36	66.73	103.80	0.15	SCRUBBER B RUN 2
9-Jun-04	15:38:27	12.49	64.96	105.96	0.44	SCRUBBER B RUN 2
9-Jun-04	15:39:27	12.74	66.04	121.11	0.44	SCRUBBER B RUN 2
9-Jun-04	15:40:27	12.39	68.59	111.96	0.74	SCRUBBER B RUN 2
9-Jun-04	15:41:27	12.14	67.61	105.96	0.44	SCRUBBER B RUN 2
9-Jun-04	15:42:27	11.94	67.32	102.82	1.03	SCRUBBER B RUN 2
9-Jun-04	15:43:27	11.96	68.69	104.98	0.15	SCRUBBER B RUN 2
9-Jun-04	15:44:27	11.36	69.03	110.04	0.30	SCRUBBER B RUN 2
9-Jun-04	15:45:27	11.87	69.03	99.81	0.59	SCRUBBER B RUN 2
9-Jun-04	15:46:27	11.33	67.66	110.04	0.59	SCRUBBER B RUN 2
9-Jun-04	15:47:27	11.38	67.85	117.12	0.59	SCRUBBER B RUN 2
9-Jun-04	15:48:27	11.34	67.95	106.01	0.59	SCRUBBER B RUN 2
9-Jun-04	15:49:27	11.16	64.31	130.99	0.59	SCRUBBER B RUN 2
9-Jun-04	15:50:27	10.82	63.13	196.97	0.59	SCRUBBER B RUN 2
9-Jun-04	15:51:27	11.47	67.95	111.02	0.89	SCRUBBER B RUN 2
9-Jun-04	15:52:27	11.34	68.44	106.99	0.30	SCRUBBER B RUN 2
9-Jun-04	15:53:27	11.51	69.53	100.90	0.30	SCRUBBER B RUN 2
9-Jun-04	15:54:27	11.93	68.54	105.03	0.30	SCRUBBER B RUN 2
9-Jun-04	15:55:27	11.22	66.87	106.99	0.30	SCRUBBER B RUN 2
9-Jun-04	15:56:27	11.32	69.43	139.94	0.30	SCRUBBER B RUN 2
9-Jun-04	16:12:48	11.79	69.87	88.85	0.74	RUN 2 CONT
9-Jun-04	16:13:48	11.97	69.28	92.88	0.74	RUN 2 CONT
9-Jun-04	16:14:49	12.04	68.79	103.80	0.44	RUN 2 CONT
9-Jun-04	16:15:48	11.92	68.30	91.80	0.74	RUN 2 CONT
9-Jun-04	16:16:49	11.78	68.59	96.92	0.44	RUN 2 CONT
9-Jun-04	16:17:49	11.87	68.30	95.84	0.44	RUN 2 CONT
9-Jun-04	16:18:49	11.94	68.30	106.06	0.44	RUN 2 CONT
9-Jun-04	16:19:48	11.89	69.28	97.90	0.44	RUN 2 CONT
9-Jun-04	16:20:48	11.30	68.69	173.92	1.03	RUN 2 CONT
9-Jun-04	16:21:48	12.62	68.59	95.74	0.44	RUN 2 CONT
9-Jun-04	16:22:48	13.15	67.12	87.77	1.03	RUN 2 CONT
9-Jun-04	16:23:48	12.41	69.77	93.87	0.74	RUN 2 CONT
9-Jun-04	16:24:48	12.16	69.28	90.82	0.74	RUN 2 CONT
9-Jun-04	16:25:48	12.53	68.20	75.77	0.44	RUN 2 CONT
9-Jun-04	16:26:48	11.88	68.59	96.92	0.44	RUN 2 CONT
9-Jun-04	16:27:48	11.96	67.12	97.90	0.44	RUN 2 CONT

Source Testing And Consulting Services, Inc.



scrubber B

9-Jun-04		RAYNIER				Comments
Parameter	Units	O2 %V	NOx ppmV	CO ppmV	SO2 ppmV	
9-Jun-04	16:28:48	11.24	67.22	146.97	0.74	RUN 2 CON'T
9-Jun-04	16:29:48	10.88	64.95	222.77	0.15	RUN 2 CON'T
9-Jun-04	16:30:48	10.96	62.88	198.88	0.74	RUN 2 CON'T
9-Jun-04	16:31:48	12.04	65.15	110.08	0.44	RUN 2 CON'T
9-Jun-04	16:32:48	11.76	65.44	83.73	0.74	RUN 2 CON'T
9-Jun-04	16:33:48	12.67	64.36	77.83	0.74	RUN 2 CON'T
9-Jun-04	16:34:48	13.87	59.25	80.88	0.44	RUN 2 CON'T
9-Jun-04	16:35:48	14.00	58.16	85.89	0.74	RUN 2 CON'T
9-Jun-04	16:36:48	14.30	53.05	74.78	0.44	RUN 2 CON'T
9-Jun-04	16:37:48	14.76	51.87	84.91	0.74	RUN 2 CON'T
9-Jun-04	16:38:48	15.33	45.77	85.80	0.74	RUN 2 CON'T
9-Jun-04	16:39:48	14.96	54.23	85.89	0.74	RUN 2 CON'T
9-Jun-04	16:42:28	12.98	-1.03	2.11	0.74	post run 2 o2-12.97
9-Jun-04	16:42:33	12.98	-1.03	0.15	1.03	post run 2 o2-12.97
9-Jun-04	16:42:38	12.98	-1.13	0.15	0.74	post run 2 o2-12.97
9-Jun-04	16:42:43	12.98	-0.93	0.15	0.15	post run 2 o2-12.97
9-Jun-04	16:42:48	12.98	-1.13	0.05	0.15	post run 2 o2-12.97
9-Jun-04	16:42:53	12.99	-1.13	0.15	0.44	post run 2 o2-12.97
9-Jun-04	16:42:58	12.99	-1.23	0.15	0.44	post run 2 o2-12.97
9-Jun-04	16:43:03	12.99	-1.03	0.15	0.44	post run 2 o2-12.97
9-Jun-04	16:43:08	12.99	-1.33	-0.05	0.44	post run 2 o2-12.97
9-Jun-04	16:43:13	12.99	-1.13	0.05	0.74	post run 2 o2-12.97
9-Jun-04	16:43:18	12.99	-1.03	0.15	0.44	post run 2 o2-12.97
9-Jun-04	16:43:23	12.99	-1.13	0.15	0.15	post run 2 o2-12.97
9-Jun-04	16:43:28	12.99	-1.23	0.15	0.44	post run 2 o2-12.97
9-Jun-04	16:43:33	12.99	-1.13	0.15	0.44	post run 2 o2-12.97
9-Jun-04	16:43:38	12.99	-1.03	0.15	0.44	post run 2 o2-12.97
9-Jun-04	16:43:43	12.99	-1.23	0.05	0.44	post run 2 o2-12.97
9-Jun-04	16:43:48	12.99	-1.13	0.15	0.74	post run 2 o2-12.97
9-Jun-04	16:43:53	12.99	-1.03	0.15	0.44	post run 2 o2-12.97
9-Jun-04	16:43:58	12.99	-1.13	0.25	0.44	post run 2 o2-12.97
9-Jun-04	16:44:03	12.99	-1.13	0.05	0.74	post run 2 o2-12.97
9-Jun-04	16:44:08	12.99	-1.13	0.15	0.74	post run 2 o2-12.97
9-Jun-04	16:44:13	12.99	-1.03	0.15	0.15	post run 2 o2-12.97
9-Jun-04	16:44:18	12.99	-1.13	0.15	0.15	post run 2 o2-12.97
9-Jun-04	16:44:23	12.99	-1.13	0.15	0.44	post run 2 o2-12.97
9-Jun-04	16:44:28	12.99	-1.13	0.15	0.44	post run 2 o2-12.97
9-Jun-04	16:44:33	12.99	-1.13	0.15	0.44	post run 2 o2-12.97
9-Jun-04	16:44:38	12.99	-1.13	0.15	0.74	post run 2 o2-12.97
9-Jun-04	16:44:43	13.00	-1.03	0.15	0.74	post run 2 o2-12.97
9-Jun-04	16:44:48	12.99	-1.33	0.05	-0.15	post run 2 o2-12.97
9-Jun-04	16:44:53	12.99	-1.13	0.15	0.44	post run 2 o2-12.97
9-Jun-04	16:46:48	0.07	181.28	307.05	0.74	nx=181 co=306
9-Jun-04	16:46:52	0.07	181.67	311.96	0.74	nx=181 co=306

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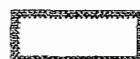


scrubber B

9-Jun-04 RAYNIER

	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
9-Jun-04	16:46:57	0.07	181.77	313.04	0.74	nx=181 co=306
9-Jun-04	16:47:02	0.07	181.77	313.04	0.74	nx=181 co=306
9-Jun-04	16:47:07	0.07	181.57	313.93	0.44	nx=181 co=306
9-Jun-04	16:48:55	0.05	96.32	98.87	0.15	NX 95 CO=96.8
9-Jun-04	16:49:00	0.05	96.32	98.87	0.44	NX 95 CO=96.8
9-Jun-04	16:49:05	0.05	96.42	98.87	0.44	NX 95 CO=96.8
9-Jun-04	16:49:10	0.05	96.51	98.87	0.44	NX 95 CO=96.8
9-Jun-04	16:49:15	0.04	96.43	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:49:20	0.05	96.43	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:49:25	0.05	96.43	98.79	-0.15	NX 95 CO=96.8
9-Jun-04	16:49:30	0.05	96.33	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:49:35	0.05	96.52	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:49:40	0.05	96.43	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:49:45	0.04	96.13	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:49:50	0.04	96.52	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:49:55	0.05	96.43	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:50:00	0.05	96.62	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:50:05	0.04	96.72	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:50:10	0.05	96.62	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:50:15	0.04	96.62	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:50:20	0.04	96.33	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:50:25	0.04	96.52	98.79	0.44	NX 95 CO=96.8
9-Jun-04	16:50:30	0.04	96.33	98.79	0.44	NX 95 CO=96.8
9-Jun-04	16:50:35	0.04	96.43	98.79	0.15	NX 95 CO=96.8
9-Jun-04	16:54:17	0.03	-1.23	0.05	24.63	SO2=24.9
9-Jun-04	16:54:22	0.03	-1.23	0.05	25.23	SO2=24.9
9-Jun-04	16:54:27	0.04	-1.23	-0.05	25.23	SO2=24.9
9-Jun-04	16:54:32	0.03	-1.13	0.05	25.23	SO2=24.9
9-Jun-04	17:51:27	11.33	52.56	507.99	1.03	SCRUBBER B RUN 3
9-Jun-04	17:52:26	12.28	65.84	185.92	0.15	SCRUBBER B RUN 3
9-Jun-04	17:53:26	12.49	68.79	169.89	0.44	SCRUBBER B RUN 3
9-Jun-04	17:54:26	12.44	67.32	162.02	0.44	SCRUBBER B RUN 3
9-Jun-04	17:55:26	12.83	69.77	176.97	0.44	SCRUBBER B RUN 3
9-Jun-04	17:56:26	13.50	66.73	191.82	0.44	SCRUBBER B RUN 3
9-Jun-04	17:57:26	12.04	63.28	179.82	0.74	SCRUBBER B RUN 3
9-Jun-04	17:58:26	12.39	62.60	163.00	0.44	SCRUBBER B RUN 3
9-Jun-04	17:59:26	12.00	63.58	161.04	0.44	SCRUBBER B RUN 3
9-Jun-04	18:00:26	11.85	63.58	210.80	0.74	SCRUBBER B RUN 3
9-Jun-04	18:01:26	11.65	63.58	122.98	0.74	SCRUBBER B RUN 3
9-Jun-04	18:02:26	11.64	63.58	122.98	0.74	SCRUBBER B RUN 3
9-Jun-04	18:03:26	11.65	63.58	122.98	0.74	SCRUBBER B RUN 3
9-Jun-04	18:04:26	12.44	61.71	127.11	0.74	SCRUBBER B RUN 3
9-Jun-04	18:05:26	12.17	57.87	174.90	0.74	SCRUBBER B RUN 3
9-Jun-04	18:06:26	12.61	58.17	183.85	0.44	SCRUBBER B RUN 3

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scrubber B

9-Jun-04		RAYNIER				Comments
Parameter		O2	NOx	CO	SO2	
Units		%V	ppmV	ppmV	ppmV	
9-Jun-04	18:07:26	12.87	57.19	176.97	0.74	SCRUBBER B RUN 3
9-Jun-04	18:08:26	13.18	59.45	177.95	0.74	SCRUBBER B RUN 3
9-Jun-04	18:09:26	13.20	62.89	200.87	0.44	SCRUBBER B RUN 3
9-Jun-04	18:10:26	12.78	66.04	200.87	0.44	SCRUBBER B RUN 3
9-Jun-04	18:11:26	12.45	60.83	178.94	0.44	SCRUBBER B RUN 3
9-Jun-04	18:12:26	12.21	61.32	185.82	0.44	SCRUBBER B RUN 3
9-Jun-04	18:13:26	12.08	67.51	194.87	1.03	SCRUBBER B RUN 3
9-Jun-04	18:14:26	12.43	53.84	208.83	0.44	SCRUBBER B RUN 3
9-Jun-04	18:15:26	12.96	66.43	191.82	0.74	SCRUBBER B RUN 3
9-Jun-04	18:16:26	12.61	68.40	154.84	0.44	SCRUBBER B RUN 3
9-Jun-04	18:17:26	12.28	71.05	98.79	0.74	SCRUBBER B RUN 3
9-Jun-04	18:18:26	12.37	71.84	100.85	0.44	SCRUBBER B RUN 3
9-Jun-04	18:19:26	11.97	70.86	103.80	0.15	SCRUBBER B RUN 3
9-Jun-04	18:20:26	11.95	71.15	107.93	0.15	SCRUBBER B RUN 3
9-Jun-04	18:21:26	12.61	70.86	109.11	1.03	SCRUBBER B RUN 3
9-Jun-04	18:22:26	12.11	71.64	127.01	0.44	SCRUBBER B RUN 3
9-Jun-04	18:23:26	12.31	73.22	111.96	0.15	SCRUBBER B RUN 3
9-Jun-04	18:24:26	12.83	70.36	113.05	0.44	SCRUBBER B RUN 3
9-Jun-04	18:25:26	13.15	70.86	113.14	0.44	SCRUBBER B RUN 3
9-Jun-04	18:26:26	12.20	69.28	117.08	0.44	SCRUBBER B RUN 3
9-Jun-04	18:27:26	12.00	70.27	129.17	0.74	SCRUBBER B RUN 3
9-Jun-04	18:28:26	11.53	64.07	145.01	0.44	SCRUBBER B RUN 3
9-Jun-04	18:29:26	11.34	56.35	162.06	0.59	SCRUBBER B RUN 3
9-Jun-04	18:30:26	11.51	50.74	159.90	0.89	SCRUBBER B RUN 3
9-Jun-04	18:31:26	11.34	51.63	238.18	0.59	SCRUBBER B RUN 3
9-Jun-04	18:32:26	11.33	42.88	236.01	0.89	SCRUBBER B RUN 3
9-Jun-04	18:33:26	11.61	61.17	434.85	0.59	SCRUBBER B RUN 3
9-Jun-04	18:34:26	11.88	61.07	149.97	0.89	SCRUBBER B RUN 3
9-Jun-04	18:35:26	12.28	63.53	125.18	0.89	SCRUBBER B RUN 3
9-Jun-04	18:36:26	12.74	65.30	114.07	1.18	SCRUBBER B RUN 3
9-Jun-04	18:37:26	11.75	61.85	105.12	0.59	SCRUBBER B RUN 3
9-Jun-04	18:38:26	12.25	64.80	107.98	0.59	SCRUBBER B RUN 3
9-Jun-04	18:39:26	12.20	66.08	124.00	0.89	SCRUBBER B RUN 3
9-Jun-04	18:40:26	12.21	62.15	111.02	0.89	SCRUBBER B RUN 3
9-Jun-04	18:41:26	12.57	65.30	102.86	1.18	SCRUBBER B RUN 3
9-Jun-04	18:42:26	12.69	65.98	95.78	0.89	SCRUBBER B RUN 3
9-Jun-04	18:43:26	13.14	67.56	86.93	0.59	SCRUBBER B RUN 3
9-Jun-04	18:44:26	12.43	65.79	92.83	0.59	SCRUBBER B RUN 3
9-Jun-04	18:45:26	12.50	64.80	93.81	0.59	SCRUBBER B RUN 3
9-Jun-04	18:46:26	12.40	66.87	93.81	0.89	SCRUBBER B RUN 3
9-Jun-04	18:47:26	12.15	63.23	92.93	0.59	SCRUBBER B RUN 3
9-Jun-04	18:48:26	12.86	67.07	87.72	0.89	SCRUBBER B RUN 3
9-Jun-04	18:49:26	13.04	67.56	82.80	0.89	SCRUBBER B RUN 3
9-Jun-04	18:50:26	12.82	67.26	79.75	0.89	SCRUBBER B RUN 3

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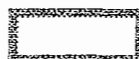


scrubber B

9-Jun-04 RAYNIER

	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
9-Jun-04	18:51:26	12.36	68.64	88.80	0.30	SCRUBBER B RUN 3
9-Jun-04	18:52:26	12.08	64.51	91.75	0.30	SCRUBBER B RUN 3
9-Jun-04	18:53:26	11.94	63.92	189.89	0.30	SCRUBBER B RUN 3
9-Jun-04	18:54:26	12.16	66.57	98.73	0.89	SCRUBBER B RUN 3
9-Jun-04	18:55:26	12.58	67.46	98.83	0.89	SCRUBBER B RUN 3
9-Jun-04	18:56:26	12.73	67.66	94.80	0.59	SCRUBBER B RUN 3
9-Jun-04	18:57:26	12.42	65.98	94.80	0.89	SCRUBBER B RUN 3
9-Jun-04	18:58:26	15.67	20.75	162.95	0.89	SCRUBBER B RUN 3
9-Jun-04	18:59:26	13.17	59.00	462.78	0.59	SCRUBBER STOP
9-Jun-04	19:00:56	0.06	-1.18	2.07	25.08	SO2=24.9
9-Jun-04	19:01:01	0.05	-1.08	0.00	25.67	SO2=24.9
9-Jun-04	19:01:06	0.05	-1.18	0.00	25.37	SO2=24.9
9-Jun-04	19:01:11	0.05	-1.18	0.10	25.67	SO2=24.9
9-Jun-04	19:03:47	0.04	178.68	303.87	0.30	NX -181 CO=306
9-Jun-04	19:03:52	0.05	178.78	310.95	0.30	NX -181 CO=306
9-Jun-04	19:03:57	0.05	178.88	311.93	0.30	NX -181 CO=306
9-Jun-04	19:04:02	0.05	178.98	311.93	0.30	NX -181 CO=306
9-Jun-04	19:04:07	0.04	178.98	312.91	0.30	NX -181 CO=306
9-Jun-04	19:07:28	0.03	94.11	98.73	0.30	NX=95 CO=96.8
9-Jun-04	19:07:33	0.03	94.01	98.73	0.30	NX=95 CO=96.8
9-Jun-04	19:07:38	0.04	94.11	98.73	0.30	NX=95 CO=96.8
9-Jun-04	19:07:43	0.03	94.01	98.83	0.00	NX=95 CO=96.8
9-Jun-04	19:07:48	0.03	94.21	98.83	0.30	NX=95 CO=96.8
9-Jun-04	19:07:53	0.04	94.01	98.73	0.30	NX=95 CO=96.8
9-Jun-04	19:07:58	0.03	94.21	98.73	0.00	NX=95 CO=96.8
9-Jun-04	19:08:03	0.04	94.01	98.83	0.30	NX=95 CO=96.8
9-Jun-04	19:08:08	0.03	94.01	98.73	0.30	NX=95 CO=96.8
9-Jun-04	19:08:13	0.03	93.81	98.73	0.59	NX=95 CO=96.8
9-Jun-04	19:08:18	0.04	95.58	98.83	0.30	NX=95 CO=96.8
9-Jun-04	19:08:23	0.03	95.68	98.73	-0.59	NX=95 CO=96.8
9-Jun-04	19:08:28	0.03	95.78	98.83	0.00	NX=95 CO=96.8
9-Jun-04	19:08:33	0.03	95.98	98.73	0.30	NX=95 CO=96.8
9-Jun-04	19:08:38	0.03	95.88	98.73	0.59	NX=95 CO=96.8
9-Jun-04	19:09:52	12.97	-1.08	6.98	0.00	O2=12.97
9-Jun-04	19:09:57	12.97	-1.08	1.97	0.00	O2=12.97
9-Jun-04	19:10:02	12.96	-0.98	2.07	0.30	O2=12.97

Source Testing And Consulting Services, Inc.



scrubber a

10-Jun-04		RAYNIER				Comments
Parameter	O2	NOx	CO	SO2		
Units	%V	ppmV	ppmV	ppmV		
10-Jun-04	8:55:43	0.10	905.94	898.36	1.18	PRE SCRUBBER CALS
10-Jun-04	8:55:48	0.10	904.66	899.35	0.89	PRE SCRUBBER CALS
10-Jun-04	8:56:02	0.10	904.76	896.20	0.59	CO 904 NX=906
10-Jun-04	8:56:07	0.10	903.58	894.33	0.89	CO 904 NX=906
10-Jun-04	8:56:12	0.10	902.89	890.30	0.89	CO 904 NX=906
10-Jun-04	8:56:17	0.10	902.40	890.30	0.89	CO 904 NX=906
10-Jun-04	8:56:25	0.10	902.59	892.27	0.89	LB
10-Jun-04	8:56:30	0.10	901.90	900.23	0.59	LB
10-Jun-04	8:56:35	0.10	902.20	900.33	0.59	LB
10-Jun-04	8:56:40	0.10	901.12	905.25	0.89	LB
10-Jun-04	8:56:45	0.10	901.21	905.25	0.89	LB
10-Jun-04	8:59:00	0.07	456.41	616.02	1.18	CE CO=619 NX=456
10-Jun-04	8:59:05	0.08	455.62	615.92	0.89	CE CO=619 NX=456
10-Jun-04	8:59:10	0.08	455.82	617.30	0.89	CE CO=619 NX=456
10-Jun-04	8:59:15	0.08	455.62	617.30	1.18	CE CO=619 NX=456
10-Jun-04	8:59:20	0.08	455.72	617.30	1.18	CE CO=619 NX=456
10-Jun-04	8:59:25	0.08	455.82	617.30	1.48	CE CO=619 NX=456
10-Jun-04	8:59:30	0.08	455.72	614.94	0.89	CE CO=619 NX=456
10-Jun-04	8:59:35	0.08	455.52	614.94	1.18	CE CO=619 NX=456
10-Jun-04	8:59:40	0.08	455.92	614.94	1.18	CE CO=619 NX=456
10-Jun-04	8:59:46	0.07	455.33	617.30	1.18	LB
10-Jun-04	8:59:51	0.07	455.72	615.04	0.30	LB
10-Jun-04	8:59:56	0.07	455.52	615.04	0.30	LB
10-Jun-04	9:00:01	0.08	455.52	613.96	1.18	LB
10-Jun-04	9:01:35	0.06	180.07	303.98	0.59	CE NX=181 CO=306
10-Jun-04	9:01:40	0.06	179.97	314.11	0.89	CE NX=181 CO=306
10-Jun-04	9:01:45	0.06	180.26	314.99	1.18	CE NX=181 CO=306
10-Jun-04	9:01:50	0.06	180.07	314.99	1.18	CE NX=181 CO=306
10-Jun-04	9:01:55	0.06	180.07	314.99	1.18	CE NX=181 CO=306
10-Jun-04	9:02:00	0.06	180.16	316.07	1.48	CE NX=181 CO=306
10-Jun-04	9:02:05	0.06	180.16	315.09	1.18	CE NX=181 CO=306
10-Jun-04	9:02:12	0.06	180.07	314.99	1.18	LB
10-Jun-04	9:02:17	0.06	179.77	315.09	1.48	LB
10-Jun-04	9:02:22	0.06	179.87	315.09	1.48	LB
10-Jun-04	9:02:27	0.06	179.87	314.99	1.18	LB
10-Jun-04	9:05:10	0.06	94.80	98.83	0.89	CE NX=95 CO=96.8
10-Jun-04	9:05:15	0.06	94.70	98.83	1.18	CE NX=95 CO=96.8
10-Jun-04	9:05:20	0.06	94.70	98.83	0.89	CE NX=95 CO=96.8
10-Jun-04	9:05:25	0.06	94.80	98.83	1.18	CE NX=95 CO=96.8
10-Jun-04	9:05:30	0.06	94.70	98.83	1.48	CE NX=95 CO=96.8
10-Jun-04	9:05:35	0.06	94.61	98.83	1.18	LB
10-Jun-04	9:05:40	0.06	94.70	98.83	1.18	LB
10-Jun-04	9:05:45	0.06	94.61	98.83	1.18	LB



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scrubber a

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RAYNIER

	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
10-Jun-04	9:05:50	0.06	94.61	98.83	0.59	LB
10-Jun-04	9:05:55	0.06	94.90	98.83	0.89	LB
10-Jun-04	9:08:28	0.06	46.02	45.83	0.30	CE NX=46.7 CO=46
10-Jun-04	9:08:33	0.06	45.83	45.83	0.59	CE NX=46.7 CO=46
10-Jun-04	9:08:38	0.06	45.73	45.93	0.30	CE NX=46.7 CO=46
10-Jun-04	9:08:43	0.06	45.73	45.93	-1.18	CE NX=46.7 CO=46
10-Jun-04	9:08:48	0.06	45.73	45.83	0.30	CE NX=46.7 CO=46
10-Jun-04	9:09:12	0.06	45.63	45.93	1.18	LB
10-Jun-04	9:09:17	0.06	45.63	45.83	0.89	LB
10-Jun-04	9:09:22	0.06	45.53	45.93	0.89	LB
10-Jun-04	9:12:40	19.97	-1.08	0.00	0.30	CE O2=19.99
10-Jun-04	9:12:45	19.97	-1.18	0.00	0.89	CE O2=19.99
10-Jun-04	9:12:50	19.97	-1.18	0.00	0.89	CE O2=19.99
10-Jun-04	9:12:55	19.98	-1.18	0.00	0.59	CE O2=19.99
10-Jun-04	9:13:02	19.98	-1.18	0.00	0.00	LB
10-Jun-04	9:13:07	19.98	-1.18	0.10	0.89	LB
10-Jun-04	9:13:12	19.98	-1.18	0.00	0.59	LB
10-Jun-04	9:20:33	13.05	-1.28	0.10	0.30	O2=12.97
10-Jun-04	9:20:38	13.04	-1.28	0.10	0.89	O2=12.97
10-Jun-04	9:20:43	13.04	-1.38	0.00	0.89	O2=12.97
10-Jun-04	9:20:48	13.04	-1.28	0.00	0.59	O2=12.97
10-Jun-04	9:20:53	13.06	-1.28	0.10	0.59	O2=12.97
10-Jun-04	9:20:58	13.05	-1.28	0.00	0.89	O2=12.97
10-Jun-04	9:21:03	13.04	-1.28	0.00	1.18	O2=12.97
10-Jun-04	9:21:08	13.05	-1.28	0.00	0.59	O2=12.97
10-Jun-04	9:21:13	13.06	-1.38	0.00	0.59	O2=12.97
10-Jun-04	9:21:18	13.05	-1.28	0.00	0.59	O2=12.97
10-Jun-04	9:21:23	13.05	-1.28	0.00	0.89	O2=12.97
10-Jun-04	9:21:28	13.05	-1.28	0.00	0.59	O2=12.97
10-Jun-04	9:21:33	13.05	-1.38	0.00	0.59	O2=12.97
10-Jun-04	9:21:38	13.05	-1.38	0.10	0.59	O2=12.97
10-Jun-04	9:21:43	13.05	-1.28	0.00	0.30	O2=12.97
10-Jun-04	9:21:48	13.05	-1.38	0.10	0.30	O2=12.97
10-Jun-04	9:21:53	13.05	-1.28	-0.10	0.89	O2=12.97
10-Jun-04	9:21:58	13.05	-1.38	0.10	0.59	O2=12.97
10-Jun-04	9:22:03	13.05	-1.38	0.00	0.59	O2=12.97
10-Jun-04	9:22:08	13.05	-1.28	0.00	0.59	O2=12.97
10-Jun-04	9:22:13	13.05	-1.28	0.00	0.30	O2=12.97
10-Jun-04	9:22:18	13.05	-1.28	0.00	0.30	O2=12.97
10-Jun-04	9:22:23	13.05	-1.28	0.10	0.59	O2=12.97
10-Jun-04	9:22:28	13.05	-1.28	0.00	0.59	O2=12.97
10-Jun-04	9:22:33	13.05	-1.38	0.00	1.18	O2=12.97
10-Jun-04	9:22:38	13.05	-1.28	0.00	0.89	O2=12.97
10-Jun-04	9:22:43	13.05	-1.28	0.00	0.00	O2=12.97

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10-Jun-04		RAYNIER				
Parameter		O2	NOx	CO	SO2	Comments
Units		%V	ppmV	ppmV	ppmV	
10-Jun-04	9:22:48	13.05	-1.28	0.00	0.59	O2=12.97
10-Jun-04	9:22:53	13.05	-1.38	0.00	0.89	O2=12.97
10-Jun-04	9:22:58	13.05	-1.38	0.00	0.30	O2=12.97
10-Jun-04	9:23:03	13.05	-1.28	0.00	0.59	O2=12.97
10-Jun-04	9:23:08	13.05	-1.38	0.00	0.30	O2=12.97
10-Jun-04	9:23:13	13.05	-1.28	0.00	0.30	O2=12.97
10-Jun-04	9:23:18	13.05	-1.38	0.10	0.30	O2=12.97
10-Jun-04	9:23:23	13.05	-1.38	0.00	0.59	O2=12.97
10-Jun-04	9:23:28	13.05	-1.18	0.00	0.59	O2=12.97
10-Jun-04	9:23:33	13.05	-1.28	0.00	0.59	O2=12.97
10-Jun-04	9:23:38	13.04	-1.38	0.00	0.59	O2=12.97
10-Jun-04	9:23:43	13.05	-1.38	0.00	0.59	O2=12.97
10-Jun-04	9:23:48	13.05	-1.38	0.10	0.59	O2=12.97
10-Jun-04	9:23:53	13.05	-1.38	0.00	0.59	O2=12.97
10-Jun-04	9:23:58	13.04	-1.28	0.00	0.59	O2=12.97
10-Jun-04	9:24:07	13.05	-1.28	0.00	0.59	LB
10-Jun-04	9:24:12	13.05	-1.28	0.00	0.89	LB
10-Jun-04	9:24:17	13.05	-1.38	0.00	0.89	LB
10-Jun-04	9:24:22	13.05	-1.38	0.10	0.59	LB
10-Jun-04	9:24:27	13.06	-1.28	0.10	0.59	LB
10-Jun-04	9:24:32	13.05	-1.28	0.00	0.89	LB
10-Jun-04	9:24:37	13.05	-1.28	0.10	0.59	LB
10-Jun-04	9:24:42	13.05	-1.28	-0.10	0.59	LB
10-Jun-04	9:24:47	13.05	-1.38	0.00	0.89	LB
10-Jun-04	9:24:52	13.05	-1.28	0.00	0.59	LB
10-Jun-04	9:24:57	13.05	-1.48	0.00	0.59	LB
10-Jun-04	9:25:02	13.04	-1.28	0.00	0.59	LB
10-Jun-04	9:25:07	13.06	-1.38	0.10	0.59	LB
10-Jun-04	9:25:12	13.05	-1.28	0.00	0.59	LB
10-Jun-04	9:25:17	13.05	-1.38	0.00	0.00	LB
10-Jun-04	9:25:22	13.05	-1.38	0.00	0.30	LB
10-Jun-04	9:25:27	13.05	-1.38	0.10	0.30	LB
10-Jun-04	9:25:32	13.05	-1.28	0.10	0.30	LB
10-Jun-04	9:25:37	13.05	-1.28	0.00	0.30	LB
10-Jun-04	9:25:42	13.05	-1.38	0.10	0.59	LB
10-Jun-04	9:25:47	13.05	-1.28	0.10	0.59	LB
10-Jun-04	9:25:52	13.06	-1.38	0.10	0.59	LB
10-Jun-04	9:25:57	13.02	-1.38	0.10	0.59	LB
10-Jun-04	9:26:02	13.05	-1.38	0.00	0.59	LB
10-Jun-04	9:26:07	13.05	-1.48	0.00	0.30	LB
10-Jun-04	9:26:12	13.05	-1.38	0.00	0.30	LB
10-Jun-04	9:26:17	13.05	-1.28	0.00	0.59	LB
10-Jun-04	9:26:22	13.05	-1.38	0.00	0.30	LB
10-Jun-04	9:26:27	13.05	-1.38	0.00	0.30	LB

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RAYNIER

Parameter	O2	NOx	CO	SO2	Comments
Units	%V	ppmV	ppmV	ppmV	
10-Jun-04 9:26:32	13.04	-1.28	0.00	0.59	LB
10-Jun-04 9:26:37	13.05	-1.38	0.00	0.59	LB
10-Jun-04 9:26:42	13.05	-1.28	0.00	0.59	LB
10-Jun-04 9:26:47	13.05	-1.28	0.00	0.59	LB
10-Jun-04 9:26:52	13.05	-1.38	0.00	0.59	LB
10-Jun-04 9:26:57	13.05	-1.18	-0.10	0.59	LB
10-Jun-04 9:27:02	13.05	-1.28	0.00	1.18	LB
10-Jun-04 9:27:07	13.05	-1.28	0.00	0.59	LB
10-Jun-04 9:27:12	13.06	-1.28	0.00	0.59	LB
10-Jun-04 9:27:17	13.05	-1.28	0.00	0.89	LB
10-Jun-04 9:27:22	13.05	-1.38	0.00	0.30	LB
10-Jun-04 9:27:27	13.06	-1.28	0.10	0.00	LB
10-Jun-04 9:27:32	13.05	-1.38	0.00	0.30	LB
10-Jun-04 9:27:37	13.05	-1.38	0.00	0.59	LB
10-Jun-04 9:27:42	13.05	-1.28	0.10	0.89	LB
10-Jun-04 9:27:47	13.05	-1.28	0.10	0.59	LB
10-Jun-04 9:27:52	13.05	-1.28	0.00	0.30	LB
10-Jun-04 9:27:57	13.05	-1.28	0.00	0.59	LB
10-Jun-04 9:28:02	13.05	-1.38	0.00	0.59	LB
10-Jun-04 9:28:07	13.05	-1.38	0.10	0.59	LB
10-Jun-04 9:28:12	13.05	-1.28	0.10	0.59	LB
10-Jun-04 9:28:17	13.05	-1.38	0.00	0.30	LB
10-Jun-04 9:28:22	13.05	-1.38	0.10	0.59	LB
10-Jun-04 9:28:27	13.05	-1.38	0.00	0.89	LB
10-Jun-04 9:28:32	13.05	-1.38	0.00	0.30	LB
10-Jun-04 9:28:37	13.05	-1.38	0.00	0.59	LB
10-Jun-04 9:28:42	13.05	-1.28	0.00	0.59	LB
10-Jun-04 9:28:47	13.05	-1.38	0.10	0.89	LB
10-Jun-04 9:28:52	13.05	-1.28	0.00	0.59	LB
10-Jun-04 9:28:57	13.05	-1.28	0.10	0.59	LB
10-Jun-04 9:29:02	13.05	-1.28	0.00	0.89	LB
10-Jun-04 9:29:07	13.05	-1.38	0.10	0.59	LB
10-Jun-04 9:29:12	13.05	-1.28	0.00	0.59	LB
10-Jun-04 9:29:17	13.05	-1.38	0.00	0.89	LB
10-Jun-04 9:29:22	13.05	-1.28	0.00	0.59	LB
10-Jun-04 9:29:27	13.05	-1.28	0.00	0.59	LB
10-Jun-04 9:29:32	13.05	-1.18	0.00	0.59	LB
10-Jun-04 9:29:37	13.05	-1.38	0.10	1.18	LB
10-Jun-04 9:29:42	13.05	-1.28	0.00	0.59	LB
10-Jun-04 9:29:47	13.05	-1.38	0.00	1.18	LB
10-Jun-04 9:29:52	13.05	-1.38	0.10	0.89	LB
10-Jun-04 9:29:57	13.05	-1.38	0.00	0.30	LB
10-Jun-04 9:30:02	13.05	-1.28	0.00	0.59	LB
10-Jun-04 9:30:07	13.06	-1.38	0.00	0.59	LB

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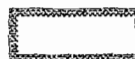


scrubber a

10-Jun-04 RAYNIER

	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
10-Jun-04	9:30:12	13.05	-1.38	-0.10	0.89	LB
10-Jun-04	9:30:17	13.06	-1.38	0.00	0.89	LB
10-Jun-04	9:30:22	13.06	-1.38	-0.10	0.89	LB
10-Jun-04	9:30:27	13.05	-1.28	0.00	0.59	LB
10-Jun-04	10:02:53	11.24	96.43	187.80	0.44	RT
10-Jun-04	10:02:58	10.81	96.13	187.70	0.44	RT
10-Jun-04	10:03:03	10.68	97.51	212.87	0.74	RT
10-Jun-04	10:03:08	10.62	96.73	212.87	1.03	RT
10-Jun-04	10:03:13	10.60	96.63	238.15	0.74	RT
10-Jun-04	10:03:18	10.51	75.97	238.15	0.44	RT
10-Jun-04	10:03:23	12.79	0.05	259.20	0.44	RT
10-Jun-04	10:03:28	18.41	-0.54	259.20	0.74	RT
10-Jun-04	10:03:33	19.69	-0.93	224.87	0.74	RT
10-Jun-04	10:03:38	19.89	-0.93	224.77	1.03	RT
10-Jun-04	10:03:43	19.91	-1.03	165.08	0.74	RT
10-Jun-04	10:03:48	19.94	-1.03	165.08	0.44	RT
10-Jun-04	10:03:53	19.95	-1.03	100.86	0.74	RT
10-Jun-04	10:03:58	19.96	-1.03	100.76	0.44	RT
10-Jun-04	10:04:03	19.97	-1.13	49.71	1.03	RT
10-Jun-04	10:04:08	19.95	-1.13	49.81	0.74	RT
10-Jun-04	10:04:13	19.98	-1.23	19.82	0.15	RT
10-Jun-04	10:04:18	19.98	-1.23	19.82	0.44	RT
10-Jun-04	10:04:23	19.97	-1.23	5.95	0.44	RT
10-Jun-04	10:04:28	19.98	-1.13	5.95	0.74	RT
10-Jun-04	10:04:33	19.99	-1.13	0.93	0.74	RT
10-Jun-04	10:04:38	19.98	-1.33	0.93	0.44	RT
10-Jun-04	10:04:43	19.99	-1.23	-0.05	0.44	RT
10-Jun-04	10:04:48	19.99	-1.13	-0.15	0.15	RT
10-Jun-04	10:04:53	19.98	-1.13	-0.05	0.15	RT
10-Jun-04	10:04:58	19.98	-1.33	-0.05	0.44	RT
10-Jun-04	10:05:03	20.00	90.92	-0.05	0.74	RT
10-Jun-04	10:05:08	14.79	97.91	-0.05	0.74	RT
10-Jun-04	10:05:13	11.78	98.30	17.95	0.44	RT
10-Jun-04	10:05:18	11.18	98.99	17.85	0.15	RT
10-Jun-04	10:05:23	11.17	99.28	55.62	0.44	RT
10-Jun-04	10:05:28	11.11	98.59	55.71	0.44	RT
10-Jun-04	10:05:33	11.09	99.28	96.73	1.03	RT
10-Jun-04	10:05:38	11.11	98.79	96.82	0.74	RT
10-Jun-04	10:05:43	11.11	97.71	133.02	0.44	RT
10-Jun-04	10:05:48	11.07	97.51	133.02	0.74	RT
10-Jun-04	10:05:53	11.01	97.61	155.73	0.44	RT
10-Jun-04	10:05:58	11.07	97.32	155.83	0.74	RT
10-Jun-04	10:06:03	10.95	96.82	170.78	0.44	RT
10-Jun-04	10:06:08	10.69	96.04	170.68	0.44	RT

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10-Jun-04		RAYNIER				
	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
10-Jun-04	10:06:13	10.55	94.56	207.66	0.44	RT
10-Jun-04	10:06:18	10.43	93.48	207.76	0.74	RT
10-Jun-04	10:06:23	10.32	92.40	292.04	0.44	RT
10-Jun-04	10:06:28	10.23	92.40	292.04	0.15	RT
10-Jun-04	10:06:33	10.18	93.58	434.94	0.44	RT
10-Jun-04	10:06:38	10.33	12.93	434.94	0.74	RT
10-Jun-04	10:06:43	17.67	-0.54	524.05	0.44	RT
10-Jun-04	10:06:48	19.49	-0.74	523.95	0.44	RT
10-Jun-04	10:06:53	19.90	-0.84	466.91	0.44	RT
10-Jun-04	10:06:58	19.96	-0.93	466.91	0.44	RT
10-Jun-04	10:07:03	19.98	-1.13	355.87	0.44	RT
10-Jun-04	10:07:08	19.98	-1.13	355.87	0.44	RT
10-Jun-04	10:07:13	19.99	-1.13	216.81	0.44	RT
10-Jun-04	10:07:18	19.99	-1.13	216.81	0.44	RT
10-Jun-04	10:07:23	20.00	-1.23	104.99	0.44	RT
10-Jun-04	10:07:28	20.00	-1.13	104.99	0.44	RT
10-Jun-04	10:07:33	20.00	-1.23	39.78	0.44	RT
10-Jun-04	10:07:38	20.00	-1.23	39.68	0.44	RT
10-Jun-04	10:07:43	20.00	-1.23	10.77	0.44	RT
10-Jun-04	10:07:48	20.00	-1.23	10.77	0.44	RT
10-Jun-04	10:07:53	20.01	-1.33	1.82	0.44	RT
10-Jun-04	10:07:58	20.01	-1.13	1.92	0.44	RT
10-Jun-04	10:08:03	20.01	-1.33	-0.05	0.44	RT
10-Jun-04	10:08:08	20.01	-1.23	-0.05	0.44	RT
10-Jun-04	10:08:13	20.01	-1.33	-0.15	0.44	RT
10-Jun-04	10:08:18	20.01	-1.23	-0.15	0.44	RT
10-Jun-04	10:08:23	20.01	-1.23	-0.15	0.15	RT
10-Jun-04	10:08:28	20.01	-1.23	-0.05	0.44	RT
10-Jun-04	10:08:33	19.98	-1.23	-0.05	0.44	RT
10-Jun-04	10:08:38	19.15	94.27	-0.05	0.44	RT
10-Jun-04	10:08:43	12.93	96.82	9.79	0.44	RT
10-Jun-04	10:08:48	11.38	96.13	9.79	0.15	RT
10-Jun-04	10:08:53	11.28	96.23	51.78	0.44	RT
10-Jun-04	10:08:58	11.36	96.63	51.68	0.44	RT
10-Jun-04	10:09:03	11.42	96.13	100.86	0.44	RT
10-Jun-04	10:09:08	11.41	95.64	100.86	0.44	RT
10-Jun-04	10:09:13	11.43	94.46	146.88	0.74	RT
10-Jun-04	10:09:18	11.49	91.26	146.92	0.59	RT
10-Jun-04	10:09:23	11.65	89.49	177.02	0.30	RT
10-Jun-04	10:09:28	11.72	89.10	177.02	0.59	RT
10-Jun-04	10:09:33	11.77	88.12	190.79	1.18	RT
10-Jun-04	10:09:38	11.81	87.03	190.79	0.89	RT
10-Jun-04	10:09:43	11.86	86.94	196.88	0.59	RT
10-Jun-04	10:09:48	11.88	87.03	196.98	0.89	RT

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RAYNIER

Parameter	O2	NOx	CO	SO2	Comments
Units	%V	ppmV	ppmV	ppmV	
10-Jun-04 10:09:53	11.90	87.62	198.85	0.89	RT
10-Jun-04 10:09:58	11.87	87.43	198.85	0.59	RT
10-Jun-04 10:10:03	11.86	86.54	197.87	1.18	RT
10-Jun-04 10:10:08	12.00	86.94	197.87	0.89	RT
10-Jun-04 10:10:13	12.04	87.33	194.82	0.59	RT
10-Jun-04 10:10:18	11.99	87.33	194.92	0.59	RT
10-Jun-04 10:10:23	12.00	87.23	192.95	0.89	RT
10-Jun-04 10:10:28	12.01	87.53	192.95	0.59	RT
10-Jun-04 10:10:33	12.06	87.43	192.95	0.89	RT
10-Jun-04 10:10:38	12.14	87.33	192.95	0.89	RT
10-Jun-04 10:10:43	12.13	86.94	194.82	0.89	RT
10-Jun-04 10:10:48	12.14	87.23	194.82	0.59	RT
10-Jun-04 10:10:53	12.14	87.03	194.92	0.59	RT
10-Jun-04 10:10:58	12.12	87.13	194.92	0.89	RT
10-Jun-04 10:11:03	12.09	87.23	195.80	0.89	RT
10-Jun-04 10:11:08	12.09	86.54	195.90	1.18	RT
10-Jun-04 10:11:13	12.12	85.95	195.80	0.89	RT
10-Jun-04 10:11:18	12.15	85.36	195.80	0.89	RT
10-Jun-04 10:11:23	12.15	85.76	195.80	0.59	RT
10-Jun-04 10:11:28	12.09	86.84	195.80	0.59	RT
10-Jun-04 10:11:33	11.98	86.74	193.83	0.89	RT
10-Jun-04 10:11:38	11.97	85.66	193.93	0.59	RT
10-Jun-04 10:11:43	11.96	86.44	190.88	0.59	RT
10-Jun-04 10:11:48	11.85	86.74	190.88	0.89	RT
10-Jun-04 10:11:53	11.84	86.05	187.84	1.18	RT
10-Jun-04 10:11:58	11.94	85.07	187.74	0.59	RT
10-Jun-04 10:12:03	11.97	85.46	184.89	0.59	RT
10-Jun-04 10:12:08	11.94	87.33	184.89	0.59	RT
10-Jun-04 10:12:13	11.79	90.38	182.82	0.89	RT
10-Jun-04 10:12:18	11.53	93.23	182.92	0.59	RT
10-Jun-04 10:12:23	11.30	94.80	183.90	0.30	RT
10-Jun-04 10:12:28	11.20	95.00	183.80	0.89	RT
10-Jun-04 10:12:33	11.15	95.00	184.98	0.89	RT
10-Jun-04 10:12:38	11.12	95.00	184.89	0.59	RT
10-Jun-04 10:12:43	11.11	95.10	184.89	0.59	RT
10-Jun-04 10:12:48	11.02	94.51	184.98	0.59	RT
10-Jun-04 10:12:53	10.82	92.54	192.85	1.18	RT
10-Jun-04 10:12:58	10.55	93.62	192.95	0.59	RT
10-Jun-04 10:13:03	10.49	95.10	266.02	0.89	RT
10-Jun-04 10:13:08	10.53	95.69	266.02	0.89	RT
10-Jun-04 10:13:13	10.56	94.61	320.01	0.59	RT
10-Jun-04 10:13:18	10.36	91.26	319.91	0.59	RT
10-Jun-04 10:13:23	10.23	29.11	392.09	0.59	RT
10-Jun-04 10:13:28	16.26	-0.30	392.09	0.59	RT

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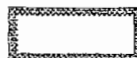
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RAYNIER

	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
10-Jun-04	10:13:33	19.22	-0.69	457.00	0.89	RT
10-Jun-04	10:13:38	19.84	-0.89	456.90	1.48	RT
10-Jun-04	10:13:43	19.94	-0.98	373.31	1.18	RT
10-Jun-04	10:13:48	19.96	-0.89	373.21	0.59	RT
10-Jun-04	10:13:53	19.97	-1.08	276.05	0.59	RT
10-Jun-04	10:13:58	19.99	-1.08	276.05	0.89	RT
10-Jun-04	10:14:03	19.98	-1.08	166.89	0.59	RT
10-Jun-04	10:14:08	19.98	-1.08	166.99	0.59	RT
10-Jun-04	10:14:13	19.99	-1.08	78.77	0.59	RT
10-Jun-04	10:14:18	19.99	-1.08	78.67	0.59	RT
10-Jun-04	10:14:23	19.99	-1.18	28.81	0.89	RT
10-Jun-04	10:14:28	19.99	-1.08	28.72	0.59	RT
10-Jun-04	10:14:33	20.00	-1.08	6.98	0.30	RT
10-Jun-04	10:14:38	20.00	-1.08	6.98	0.59	RT
10-Jun-04	10:14:43	20.00	-1.08	1.08	0.59	RT
10-Jun-04	10:14:48	20.01	-1.18	0.98	0.89	RT
10-Jun-04	10:14:53	19.98	4.92	-0.10	0.59	RT
10-Jun-04	10:14:58	17.15	92.54	0.00	0.89	RT
10-Jun-04	10:15:03	12.20	94.51	28.81	0.59	RT
10-Jun-04	10:15:08	10.91	95.59	28.91	0.59	RT
10-Jun-04	10:15:13	10.75	96.18	136.99	0.59	RT
10-Jun-04	10:15:18	10.77	95.29	136.99	0.59	RT
10-Jun-04	10:15:23	10.81	95.00	206.72	0.59	RT
10-Jun-04	10:15:28	10.79	94.80	206.72	0.89	RT
10-Jun-04	10:15:33	10.86	94.21	258.15	0.59	RT
10-Jun-04	10:15:38	10.88	94.21	258.15	1.48	RT
10-Jun-04	10:15:43	10.89	94.70	275.07	1.18	RT
10-Jun-04	10:15:48	10.86	94.51	275.07	0.59	RT
10-Jun-04	10:15:53	10.98	1.87	272.02	0.89	RT
10-Jun-04	10:15:58	11.06	417.07	272.02	0.59	RT
10-Jun-04	10:16:03	2.63	445.10	254.22	0.89	RT
10-Jun-04	10:16:08	1.01	445.99	254.22	0.59	RT
10-Jun-04	10:16:13	0.26	446.97	322.96	1.18	RT
10-Jun-04	10:16:18	0.15	447.46	322.96	1.48	RT
10-Jun-04	10:16:23	0.14	448.05	405.17	0.59	RT
10-Jun-04	10:16:28	0.13	448.64	405.17	1.18	RT
10-Jun-04	10:16:33	0.12	448.54	479.82	0.59	RT
10-Jun-04	10:16:38	0.12	449.62	479.91	0.89	RT
10-Jun-04	10:16:43	0.12	449.13	538.03	0.89	RT
10-Jun-04	10:16:48	0.12	448.84	538.03	0.59	RT
10-Jun-04	10:16:53	0.12	449.13	579.04	0.89	RT
10-Jun-04	10:16:58	0.11	449.13	579.04	1.18	RT
10-Jun-04	10:17:03	0.11	449.33	601.86	0.89	RT
10-Jun-04	10:17:08	0.12	449.03	601.96	0.59	RT

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RAYNIER

Parameter		O2	NOx	CO	SO2	Comments
Units		%V	ppmV	ppmV	ppmV	
10-Jun-04	10:17:13	0.11	449.03	609.92	0.59	RT
10-Jun-04	10:17:18	0.11	449.23	609.92	0.89	RT
10-Jun-04	10:17:23	0.11	449.33	611.89	0.59	RT
10-Jun-04	10:17:28	0.11	448.74	611.89	0.89	RT
10-Jun-04	10:17:33	0.11	449.43	610.91	0.30	RT
10-Jun-04	10:17:38	0.10	449.03	610.91	0.30	RT
10-Jun-04	10:17:43	0.11	449.43	611.89	0.59	RT
10-Jun-04	10:17:48	0.11	449.23	611.89	0.30	RT
10-Jun-04	10:17:53	0.10	449.23	613.96	0.59	RT
10-Jun-04	10:17:58	0.10	449.23	613.96	0.59	RT
10-Jun-04	10:18:03	0.11	449.33	612.97	0.59	RT
10-Jun-04	10:18:08	0.11	448.84	613.07	0.59	RT
10-Jun-04	10:18:13	0.10	449.43	614.94	0.30	RT
10-Jun-04	10:18:18	0.10	448.94	614.94	0.30	RT
10-Jun-04	10:18:23	0.10	449.13	611.89	0.59	RT
10-Jun-04	10:18:28	0.10	449.53	611.89	0.30	RT
10-Jun-04	10:18:33	0.10	448.54	610.91	0.59	RT
10-Jun-04	10:18:38	0.10	448.84	610.91	0.30	RT
10-Jun-04	10:18:43	0.10	449.23	613.96	0.59	RT
10-Jun-04	10:18:48	0.10	448.84	613.96	0.89	RT
10-Jun-04	10:18:53	0.10	448.94	613.07	0.30	RT
10-Jun-04	10:18:58	0.10	448.84	612.97	0.30	RT
10-Jun-04	10:19:03	0.10	449.13	612.97	0.89	RT
10-Jun-04	10:19:08	0.10	449.23	612.97	0.89	RT
10-Jun-04	10:19:13	0.10	448.64	614.94	0.59	RT
10-Jun-04	10:19:18	0.09	448.74	614.94	0.30	RT
10-Jun-04	10:19:23	0.09	448.94	612.97	0.59	RT
10-Jun-04	10:19:28	0.09	448.44	612.97	0.89	RT
10-Jun-04	10:19:33	0.09	448.64	611.89	0.59	RT
10-Jun-04	10:19:38	0.09	448.25	611.89	0.59	RT
10-Jun-04	10:19:43	0.09	448.44	611.79	0.59	RT
10-Jun-04	10:19:48	0.09	448.84	611.89	0.59	RT
10-Jun-04	10:19:53	0.09	448.64	614.94	0.89	RT
10-Jun-04	10:19:58	0.09	448.44	614.94	0.59	RT
10-Jun-04	10:20:03	0.09	448.84	613.96	0.30	RT
10-Jun-04	10:20:08	0.09	448.64	613.96	0.59	RT
10-Jun-04	10:20:13	0.09	448.35	612.97	0.89	RT
10-Jun-04	10:20:18	0.09	448.15	613.07	0.59	RT
10-Jun-04	10:20:23	0.09	448.64	612.97	0.59	RT
10-Jun-04	10:20:28	0.09	448.44	612.97	0.30	RT
10-Jun-04	10:20:33	0.09	448.35	611.79	0.89	RT
10-Jun-04	10:20:38	0.09	448.44	611.89	0.59	RT
10-Jun-04	10:20:43	0.09	448.15	613.07	0.30	RT
10-Jun-04	10:20:48	0.09	448.25	612.97	0.30	RT



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	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
10-Jun-04	10:20:53	0.09	448.25	614.05	0.30	RT
10-Jun-04	10:20:58	0.09	448.25	613.96	0.59	RT
10-Jun-04	10:21:03	0.09	448.44	611.89	0.30	RT
10-Jun-04	10:21:08	0.09	448.15	611.89	0.30	RT
10-Jun-04	10:21:13	0.09	448.15	611.79	0.59	RT
10-Jun-04	10:21:18	0.09	448.05	611.89	0.30	RT
10-Jun-04	10:21:23	0.08	448.05	610.91	0.30	RT
10-Jun-04	10:21:28	0.09	442.25	610.91	0.59	RT
10-Jun-04	10:21:33	0.21	115.55	609.92	0.59	RT
10-Jun-04	10:21:38	7.72	106.51	609.92	0.59	RT
10-Jun-04	10:21:43	10.18	105.72	541.18	0.59	RT
10-Jun-04	10:21:48	10.56	104.15	541.08	0.59	RT
10-Jun-04	10:21:53	10.50	102.87	446.97	0.89	RT
10-Jun-04	10:21:58	10.26	102.38	446.97	1.18	RT
10-Jun-04	10:22:03	10.09	102.18	390.23	1.48	RT
10-Jun-04	10:22:08	10.04	101.10	390.23	2.36	RT
10-Jun-04	10:22:13	9.95	98.54	373.21	2.07	RT
10-Jun-04	10:22:18	9.88	98.24	373.21	2.36	RT
10-Jun-04	10:22:23	9.93	100.02	423.07	2.95	RT
10-Jun-04	10:22:28	10.05	100.21	423.07	2.36	RT
10-Jun-04	10:22:33	10.13	98.93	467.92	2.07	RT
10-Jun-04	10:22:38	10.16	94.61	467.82	2.36	RT
10-Jun-04	10:22:43	10.39	90.87	491.22	2.66	RT
10-Jun-04	10:22:48	10.78	88.31	491.13	2.66	RT
10-Jun-04	10:22:53	11.02	87.13	499.19	2.66	RT
10-Jun-04	10:22:58	11.25	87.92	499.19	2.95	RT
10-Jun-04	10:23:03	11.51	87.72	473.92	3.25	RT
10-Jun-04	10:23:08	11.62	87.92	473.92	3.54	RT
10-Jun-04	10:23:13	11.66	88.12	408.03	2.95	RT
10-Jun-04	10:23:18	11.71	87.92	408.03	3.54	RT
10-Jun-04	10:23:23	11.80	87.62	338.89	3.25	RT
10-Jun-04	10:23:28	11.93	87.72	338.89	3.54	RT
10-Jun-04	10:23:33	12.00	87.23	272.02	3.54	RT
10-Jun-04	10:23:38	12.04	87.03	272.02	3.54	RT
10-Jun-04	10:23:43	12.07	87.62	221.76	3.84	RT
10-Jun-04	10:23:48	12.11	87.33	221.76	3.84	RT
10-Jun-04	10:23:53	12.12	88.12	198.95	3.54	RT
10-Jun-04	10:23:58	12.17	87.92	198.85	3.25	RT
10-Jun-04	10:24:03	12.19	87.62	192.95	3.54	RT
10-Jun-04	10:24:08	12.12	87.23	192.95	3.84	RT
10-Jun-04	10:24:13	12.03	87.13	191.77	3.25	RT
10-Jun-04	10:24:18	11.89	86.84	191.87	3.54	RT
10-Jun-04	10:24:23	11.77	87.53	195.80	3.54	RT
10-Jun-04	10:24:28	11.76	88.02	195.80	3.25	RT

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	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
10-Jun-04	10:24:33	11.65	83.39	200.82	3.25	RT
10-Jun-04	10:24:38	11.44	414.61	200.82	3.25	RT
10-Jun-04	10:24:43	2.24	441.46	235.14	3.54	RT
10-Jun-04	10:24:48	0.31	444.22	235.14	2.95	RT
10-Jun-04	10:24:53	0.13	445.20	327.97	2.36	RT
10-Jun-04	10:24:58	0.11	445.89	327.97	2.07	RT
10-Jun-04	10:25:03	0.10	446.38	423.07	1.18	RT
10-Jun-04	10:25:08	0.10	446.38	423.07	1.18	RT
10-Jun-04	10:25:13	0.10	446.28	498.30	0.59	RT
10-Jun-04	10:25:18	0.10	446.67	498.21	0.59	RT
10-Jun-04	10:25:23	0.10	446.87	551.21	0.59	RT
10-Jun-04	10:25:28	0.09	446.87	551.11	0.30	RT
10-Jun-04	10:25:33	0.10	447.17	584.94	0.30	RT
10-Jun-04	10:25:38	0.09	447.17	585.04	0.00	RT
10-Jun-04	10:25:43	0.09	446.97	601.96	0.59	RT
10-Jun-04	10:25:48	0.10	447.17	601.86	0.89	RT
10-Jun-04	10:25:53	0.09	447.26	610.91	0.89	RT
10-Jun-04	10:25:58	0.09	447.56	610.91	0.30	RT
10-Jun-04	10:26:03	0.09	447.26	609.92	0.30	RT
10-Jun-04	10:26:08	0.09	447.17	609.92	0.59	RT
10-Jun-04	10:26:13	0.08	447.46	611.89	0.30	RT
10-Jun-04	10:26:18	0.09	447.46	611.89	0.30	RT
10-Jun-04	10:26:23	0.09	447.46	611.89	0.30	RT
10-Jun-04	10:26:28	0.09	447.46	611.89	0.30	RT
10-Jun-04	10:26:33	0.09	447.56	614.05	0.30	RT
10-Jun-04	10:26:38	0.10	447.36	613.96	0.30	RT
10-Jun-04	10:26:43	0.09	447.36	613.96	0.59	RT
10-Jun-04	10:26:48	0.08	447.46	613.96	0.59	RT
10-Jun-04	10:26:53	0.07	447.26	613.96	0.30	RT
10-Jun-04	10:26:58	0.09	216.06	614.05	0.59	RT
10-Jun-04	10:27:03	5.49	100.70	599.89	0.30	RT
10-Jun-04	10:27:08	9.68	99.52	599.89	0.89	RT
10-Jun-04	10:27:13	10.56	98.44	519.15	1.18	RT
10-Jun-04	10:27:18	10.77	97.95	519.25	1.48	RT
10-Jun-04	10:27:23	10.83	98.34	427.99	2.07	RT
10-Jun-04	10:27:28	10.96	98.54	427.89	2.95	RT
10-Jun-04	10:27:33	11.00	97.85	341.05	3.54	RT
10-Jun-04	10:27:38	11.06	97.95	340.96	3.54	RT
10-Jun-04	10:27:43	11.07	97.85	278.11	4.13	RT
10-Jun-04	10:27:48	11.09	97.65	278.11	3.54	RT
10-Jun-04	10:27:53	11.09	97.65	237.20	3.54	RT
10-Jun-04	10:27:58	11.00	98.44	237.20	4.13	RT
10-Jun-04	10:28:03	10.94	98.44	210.75	3.54	RT
10-Jun-04	10:28:08	11.00	97.65	210.85	3.54	RT

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RAYNIER

	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
10-Jun-04	10:28:13	11.15	97.95	195.80	3.54	RT
10-Jun-04	10:28:18	11.23	97.75	195.80	3.54	RT
10-Jun-04	10:28:23	11.26	97.36	186.85	4.13	RT
10-Jun-04	10:28:28	11.28	97.16	186.85	4.13	RT
10-Jun-04	10:28:33	11.29	96.47	182.92	4.43	RT
10-Jun-04	10:28:38	11.28	95.88	182.92	3.84	RT
10-Jun-04	10:28:43	11.22	95.79	185.87	4.13	RT
10-Jun-04	10:28:48	11.09	95.20	185.87	5.02	RT
10-Jun-04	10:28:53	10.99	95.88	201.80	4.13	RT
10-Jun-04	10:28:58	10.99	96.57	201.80	4.43	RT
10-Jun-04	10:29:03	11.03	96.47	223.73	4.13	RT
10-Jun-04	10:29:08	11.13	96.28	223.73	5.31	RT
10-Jun-04	10:29:13	11.23	96.77	229.83	4.72	RT
10-Jun-04	10:29:18	11.28	96.46	229.90	5.61	RT
10-Jun-04	10:29:23	11.24	94.89	226.86	5.02	RT
10-Jun-04	10:29:28	11.34	92.33	226.86	4.43	RT
10-Jun-04	10:29:33	11.67	89.97	217.81	5.02	RT
10-Jun-04	10:29:38	11.89	89.19	217.91	5.31	RT
10-Jun-04	10:29:43	12.05	89.19	203.85	5.31	RT
10-Jun-04	10:29:48	12.04	89.19	203.75	5.02	RT
10-Jun-04	10:29:53	12.03	88.70	196.96	5.61	RT
10-Jun-04	10:29:58	12.04	87.32	197.06	5.31	RT
10-Jun-04	10:30:03	11.91	88.01	194.01	5.31	RT
10-Jun-04	10:30:08	11.69	87.71	194.01	5.61	RT
10-Jun-04	10:30:13	11.53	86.53	197.06	5.31	RT
10-Jun-04	10:30:18	11.46	87.02	197.06	5.61	RT
10-Jun-04	10:30:23	11.50	87.22	211.81	5.31	RT
10-Jun-04	10:30:28	11.54	86.83	211.81	5.61	RT
10-Jun-04	10:30:33	11.48	86.63	219.78	5.31	RT
10-Jun-04	10:30:38	11.32	86.24	219.78	5.61	RT
10-Jun-04	10:30:43	11.23	86.43	247.21	5.61	RT
10-Jun-04	10:30:48	11.27	87.12	247.31	5.61	RT
10-Jun-04	10:30:53	11.40	88.01	272.09	5.61	RT
10-Jun-04	10:30:58	11.34	90.66	272.09	5.31	RT
10-Jun-04	10:31:03	11.18	92.73	272.09	5.31	RT
10-Jun-04	10:31:08	11.04	93.81	272.09	5.31	RT
10-Jun-04	10:31:13	10.93	94.01	264.22	5.02	RT
10-Jun-04	10:31:18	11.01	94.69	264.22	4.72	RT
10-Jun-04	10:31:23	11.02	95.28	249.28	4.72	RT
10-Jun-04	10:31:28	11.02	95.87	249.28	5.02	RT
10-Jun-04	10:31:33	11.00	96.07	230.99	5.02	RT
10-Jun-04	10:31:38	11.08	96.56	230.89	5.02	RT
10-Jun-04	10:31:43	11.18	95.97	215.94	4.43	RT
10-Jun-04	10:31:48	11.32	96.17	215.84	4.43	RT

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	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
10-Jun-04	10:31:53	11.41	96.27	205.81	5.02	RT
10-Jun-04	10:31:58	11.47	96.37	205.91	4.72	RT
10-Jun-04	10:32:03	11.51	98.14	200.90	4.43	RT
10-Jun-04	10:32:08	11.48	98.53	200.99	5.31	RT
10-Jun-04	10:32:13	11.50	98.04	200.01	5.31	RT
10-Jun-04	10:32:18	11.55	98.14	199.91	5.31	RT
10-Jun-04	10:32:23	11.51	98.14	204.93	5.61	RT
10-Jun-04	10:32:28	11.36	95.97	204.93	5.61	RT
10-Jun-04	10:32:33	11.01	96.07	216.92	5.61	RT
10-Jun-04	10:32:38	10.82	96.66	216.92	5.31	RT
10-Jun-04	10:32:43	10.74	97.45	244.26	5.61	RT
10-Jun-04	10:32:48	10.77	96.07	244.16	5.90	RT
10-Jun-04	10:32:53	10.71	97.35	252.23	5.61	RT
10-Jun-04	10:32:58	10.68	97.35	252.13	5.61	RT
10-Jun-04	10:33:03	10.68	94.89	255.27	5.90	RT
10-Jun-04	10:33:08	10.63	90.47	255.27	5.61	RT
10-Jun-04	10:33:13	10.65	90.17	278.19	5.31	RT
10-Jun-04	10:33:18	10.92	89.19	278.19	5.02	RT
10-Jun-04	10:33:23	11.11	89.19	314.08	5.31	RT
10-Jun-04	10:33:28	11.17	88.99	314.08	5.61	RT
10-Jun-04	10:33:33	11.14	88.89	313.09	5.90	RT
10-Jun-04	10:33:38	11.12	88.89	313.19	5.61	RT
10-Jun-04	10:33:43	11.19	87.32	307.98	5.61	RT
10-Jun-04	10:33:48	11.12	86.43	307.98	5.90	RT
10-Jun-04	10:33:53	10.99	86.43	310.14	5.61	RT
10-Jun-04	10:33:58	10.89	85.75	310.14	5.31	RT
10-Jun-04	10:34:03	10.86	83.98	362.26	5.61	RT
10-Jun-04	10:34:08	10.81	82.99	362.16	5.61	RT
10-Jun-04	10:34:13	10.70	83.78	488.03	5.61	RT
10-Jun-04	10:34:18	10.75	54.67	488.03	5.31	RT
10-Jun-04	10:34:23	5.45	439.16	616.06	5.61	RT
10-Jun-04	10:34:28	0.90	445.16	616.06	5.31	RT
10-Jun-04	10:34:33	0.20	446.93	664.14	4.43	RT
10-Jun-04	10:34:38	0.12	447.91	664.14	2.36	RT
10-Jun-04	10:34:43	0.11	448.70	683.12	1.77	RT
10-Jun-04	10:34:48	0.11	448.89	683.12	1.48	RT
10-Jun-04	10:34:53	0.10	448.89	665.13	1.18	RT
10-Jun-04	10:34:58	0.10	449.19	665.13	0.88	RT
10-Jun-04	10:35:03	0.10	449.09	639.26	1.48	RT
10-Jun-04	10:35:08	0.10	449.97	639.26	1.48	RT
10-Jun-04	10:35:13	0.10	449.88	623.24	0.59	RT
10-Jun-04	10:35:18	0.10	449.29	623.24	1.18	RT
10-Jun-04	10:35:23	0.14	59.10	615.96	0.88	RT
10-Jun-04	10:35:28	2.37	90.37	615.96	0.88	RT

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10-Jun-04		RAYNIER				
	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
10-Jun-04	10:35:33	9.43	89.09	587.94	0.88	RT
10-Jun-04	10:35:38	11.10	88.11	588.03	1.77	RT
10-Jun-04	10:35:43	11.48	88.11	539.16	2.95	RT
10-Jun-04	10:35:48	11.58	88.20	539.16	3.54	RT
10-Jun-04	10:35:53	11.63	88.30	450.17	4.72	RT
10-Jun-04	10:35:58	11.69	88.20	450.17	5.02	RT
10-Jun-04	10:36:03	11.79	88.70	362.26	5.31	RT
10-Jun-04	10:36:08	11.84	88.40	362.26	5.31	RT
10-Jun-04	10:36:13	11.86	88.11	286.15	5.02	RT
10-Jun-04	10:36:18	11.96	87.02	286.25	5.02	RT
10-Jun-04	10:36:23	12.04	86.24	236.20	5.02	RT
10-Jun-04	10:36:28	12.03	86.93	236.20	5.02	RT
10-Jun-04	10:36:33	11.94	88.70	209.94	4.72	RT
10-Jun-04	10:36:38	11.89	88.99	209.84	5.02	RT
10-Jun-04	10:36:43	11.88	89.58	201.88	4.72	RT
10-Jun-04	10:36:48	11.81	91.06	201.88	5.31	RT
10-Jun-04	10:36:53	11.76	91.65	202.86	5.02	RT
10-Jun-04	10:36:58	11.71	93.22	202.86	4.72	RT
10-Jun-04	10:37:03	11.63	94.20	208.96	4.43	RT
10-Jun-04	10:37:08	11.54	95.38	208.96	4.72	RT
10-Jun-04	10:37:13	11.49	95.38	213.88	5.02	RT
10-Jun-04	10:37:18	11.53	95.48	213.97	4.72	RT
10-Jun-04	10:37:23	11.55	95.48	220.96	5.02	RT
10-Jun-04	10:37:28	11.55	96.56	220.96	5.31	RT
10-Jun-04	10:37:33	11.53	97.25	224.99	5.31	RT
10-Jun-04	10:37:38	11.50	97.45	224.99	5.31	RT
10-Jun-04	10:37:43	11.45	97.55	226.86	4.72	RT
10-Jun-04	10:37:48	11.43	97.74	226.86	5.02	RT
10-Jun-04	10:37:53	11.39	98.04	229.02	5.61	RT
10-Jun-04	10:37:58	11.32	98.53	229.02	5.31	RT
10-Jun-04	10:38:03	11.21	98.33	230.89	4.72	RT
10-Jun-04	10:38:08	11.12	97.74	230.89	5.31	RT
10-Jun-04	10:38:13	11.16	98.23	229.90	5.61	RT
10-Jun-04	10:38:18	11.11	99.41	229.90	5.61	RT
10-Jun-04	10:38:23	10.92	101.48	227.84	5.61	RT
10-Jun-04	10:38:28	10.80	101.38	227.84	5.02	RT
10-Jun-04	10:38:33	10.85	100.50	220.96	5.31	RT
10-Jun-04	10:38:38	11.00	100.30	220.96	5.31	RT
10-Jun-04	10:38:43	11.16	99.71	217.91	5.90	RT
10-Jun-04	10:38:48	11.29	100.20	217.91	5.61	RT
10-Jun-04	10:38:53	11.40	100.30	223.91	5.90	RT
10-Jun-04	10:38:58	11.43	101.19	223.91	5.61	RT
10-Jun-04	10:39:03	11.32	100.89	237.28	5.31	RT
10-Jun-04	12:00:48	13.20	81.97	168.02	2.80	SCRUBBER A RUN 1

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	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
10-Jun-04	12:01:48	12.66	84.62	169.99	3.10	SCRUBBER A RUN 1
10-Jun-04	12:02:48	12.92	83.25	151.01	3.10	SCRUBBER A RUN 1
10-Jun-04	12:03:48	13.05	82.85	186.90	3.10	SCRUBBER A RUN 1
10-Jun-04	12:04:48	13.03	82.17	191.82	2.51	SCRUBBER A RUN 1
10-Jun-04	12:05:48	13.46	81.08	201.95	2.80	SCRUBBER A RUN 1
10-Jun-04	12:06:48	13.39	82.46	181.98	2.80	SCRUBBER A RUN 1
10-Jun-04	12:07:48	12.96	85.21	157.99	2.51	SCRUBBER A RUN 1
10-Jun-04	12:08:48	12.18	94.75	163.99	3.69	SCRUBBER A RUN 1
10-Jun-04	12:09:48	11.83	96.47	165.02	3.25	SCRUBBER A RUN 1
10-Jun-04	12:10:48	11.71	97.85	141.02	3.25	SCRUBBER A RUN 1
10-Jun-04	12:11:48	11.80	96.87	149.09	3.25	SCRUBBER A RUN 1
10-Jun-04	12:12:48	11.81	98.24	149.97	4.43	SCRUBBER A RUN 1
10-Jun-04	12:13:48	11.68	97.36	150.07	4.72	SCRUBBER A RUN 1
10-Jun-04	12:14:48	11.47	96.77	126.96	5.31	SCRUBBER A RUN 1
10-Jun-04	12:15:48	10.91	97.16	183.90	5.31	SCRUBBER A RUN 1
10-Jun-04	12:16:48	11.11	98.34	141.02	5.90	SCRUBBER A RUN 1
10-Jun-04	12:17:48	11.13	98.24	157.05	6.20	SCRUBBER A RUN 1
10-Jun-04	12:18:48	11.40	93.52	142.01	5.90	SCRUBBER A RUN 1
10-Jun-04	12:19:48	11.96	84.77	165.12	6.49	SCRUBBER A RUN 1
10-Jun-04	12:20:48	11.79	82.80	249.30	5.61	SCRUBBER A RUN 1
10-Jun-04	12:21:48	11.64	83.98	267.10	5.31	SCRUBBER A RUN 1
10-Jun-04	12:22:48	11.09	95.20	339.97	5.31	SCRUBBER A RUN 1
10-Jun-04	12:23:48	10.89	92.64	221.86	4.72	SCRUBBER A RUN 1
10-Jun-04	12:24:48	10.77	90.57	444.02	4.13	SCRUBBER A RUN 1
10-Jun-04	12:25:48	10.78	93.33	512.27	4.43	SCRUBBER A RUN 1
10-Jun-04	12:26:48	11.65	95.49	184.98	4.13	SCRUBBER A RUN 1
10-Jun-04	12:27:48	11.04	95.69	183.90	3.84	SCRUBBER A RUN 1
10-Jun-04	12:28:48	11.17	97.85	247.23	3.84	SCRUBBER A RUN 1
10-Jun-04	12:29:48	11.00	98.19	153.06	3.98	SCRUBBER A RUN 1
10-Jun-04	12:30:48	11.03	98.29	245.40	3.39	SCRUBBER A RUN 1
10-Jun-04	12:31:48	10.57	95.04	299.10	3.69	SCRUBBER A RUN 1
10-Jun-04	12:32:48	10.28	91.21	407.27	3.98	SCRUBBER A RUN 1
10-Jun-04	12:33:48	11.04	96.81	300.08	3.39	SCRUBBER A RUN 1
10-Jun-04	12:34:48	10.51	88.95	335.97	3.69	SCRUBBER A RUN 1
10-Jun-04	12:35:48	10.51	92.29	866.21	3.39	SCRUBBER A RUN 1
10-Jun-04	12:36:48	11.78	89.24	337.15	3.39	SCRUBBER A RUN 1
10-Jun-04	12:37:48	10.80	91.70	571.20	3.39	SCRUBBER A RUN 1
10-Jun-04	12:38:48	10.51	90.42	567.17	3.10	SCRUBBER A RUN 1
10-Jun-04	12:39:48	10.48	91.01	606.11	3.39	SCRUBBER A RUN 1
10-Jun-04	12:40:48	11.16	94.55	512.29	3.69	SCRUBBER A RUN 1
10-Jun-04	12:41:48	11.68	95.93	203.81	3.69	SCRUBBER A RUN 1
10-Jun-04	12:42:48	11.02	96.62	187.97	3.98	SCRUBBER A RUN 1
10-Jun-04	12:43:48	11.15	97.01	266.15	3.39	SCRUBBER A RUN 1
10-Jun-04	12:44:48	11.15	93.47	265.27	3.98	SCRUBBER A RUN 1

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Parameter	O2	NOx	CO	SO2	Comments
Units	%V	ppmV	ppmV	ppmV	
10-Jun-04 12:45:48	10.90	89.24	359.97	3.39	SCRUBBER A RUN 1
10-Jun-04 12:46:48	10.98	54.14	199.97	3.69	SCRUBBER A RUN 1
10-Jun-04 12:47:48	10.73	52.37	277.26	3.98	SCRUBBER A RUN 1
10-Jun-04 12:48:48	9.81	54.14	713.10	3.69	SCRUBBER A RUN 1
10-Jun-04 12:49:48	10.60	47.50	525.42	3.54	SCRUBBER A RUN 1
10-Jun-04 12:50:48	10.69	46.22	482.15	3.84	SCRUBBER A RUN 1
10-Jun-04 12:51:48	11.25	41.79	132.07	4.13	SCRUBBER A RUN 1
10-Jun-04 12:52:48	11.12	40.22	241.42	4.13	SCRUBBER A RUN 1
10-Jun-04 12:53:48	10.42	39.24	406.33	3.54	SCRUBBER A RUN 1
10-Jun-04 12:54:48	11.13	40.02	112.01	4.13	SCRUBBER A RUN 1
10-Jun-04 12:55:48	11.34	40.81	101.88	3.84	SCRUBBER A RUN 1
10-Jun-04 12:56:48	11.44	39.04	78.87	4.43	SCRUBBER A RUN 1
10-Jun-04 12:57:48	11.80	35.01	90.77	4.43	SCRUBBER A RUN 1
10-Jun-04 12:58:48	12.13	35.30	91.85	4.13	SCRUBBER A RUN 1
10-Jun-04 12:59:48	12.24	32.45	95.88	3.54	SCRUBBER A RUN 1
10-Jun-04 13:00:48	12.38	31.37	92.93	3.84	SCRUBBER A RUN 1
10-Jun-04 13:09:56	0.07	181.33	313.19	3.84	X
10-Jun-04 13:24:39	0.10	181.72	306.21	4.43	CO=306 NX=181
10-Jun-04 13:25:24	0.09	182.11	313.19	4.13	Test
10-Jun-04 13:25:29	0.09	182.11	313.19	4.72	Test
10-Jun-04 13:25:34	0.09	182.11	314.18	4.43	Test
10-Jun-04 13:25:39	0.09	182.21	314.08	3.84	Test
10-Jun-04 13:25:44	0.09	182.41	314.08	4.43	Test
10-Jun-04 13:25:49	0.09	182.41	314.18	4.13	Test
10-Jun-04 13:25:54	0.09	182.02	312.11	4.43	Test
10-Jun-04 13:25:59	0.09	182.21	312.11	4.72	Test
10-Jun-04 13:26:04	0.09	182.61	313.19	4.43	Test
10-Jun-04 13:26:09	0.09	182.41	313.19	4.13	Test
10-Jun-04 13:28:20	0.07	95.58	98.82	4.43	NX=95 CO=96.8
10-Jun-04 13:28:25	0.07	95.48	98.82	4.13	NX=95 CO=96.8
10-Jun-04 13:28:30	0.07	95.78	98.82	5.02	NX=95 CO=96.8
10-Jun-04 13:28:35	0.07	95.78	97.94	4.72	NX=95 CO=96.8
10-Jun-04 13:28:40	0.07	95.78	97.94	5.02	NX=95 CO=96.8
10-Jun-04 13:29:58	12.97	-0.84	6.05	3.98	O2=12.97
10-Jun-04 13:30:03	12.97	-0.93	1.13	3.98	O2=12.97
10-Jun-04 13:30:08	12.97	-0.93	1.13	4.28	O2=12.97
10-Jun-04 13:30:13	12.97	-1.03	0.05	4.28	O2=12.97
10-Jun-04 13:30:18	12.97	-1.03	0.05	4.28	O2=12.97
10-Jun-04 14:39:45	20.72	-1.13	-0.05	4.57	
10-Jun-04 14:41:39	11.35	92.19	134.08	4.57	SCRUBBER A RUN 2
10-Jun-04 14:42:39	11.61	92.88	151.88	4.28	SCRUBBER A RUN 2
10-Jun-04 14:43:39	11.02	93.67	142.93	4.87	SCRUBBER A RUN 2
10-Jun-04 14:44:39	11.54	91.41	162.01	4.57	SCRUBBER A RUN 2
10-Jun-04 14:45:39	11.92	92.29	177.94	4.57	SCRUBBER A RUN 2

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10-Jun-04

RAYNIER

	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
10-Jun-04	14:46:39	11.81	91.41	163.00	4.57	SCRUBBER A RUN 2
10-Jun-04	14:47:39	11.65	91.21	165.06	4.57	SCRUBBER A RUN 2
10-Jun-04	14:48:39	11.78	90.32	168.99	4.28	SCRUBBER A RUN 2
10-Jun-04	14:49:39	11.86	91.95	204.94	4.72	SCRUBBER A RUN 2
10-Jun-04	14:50:39	12.51	91.16	244.17	4.72	SCRUBBER A RUN 2
10-Jun-04	14:51:39	13.01	88.31	303.08	4.72	SCRUBBER A RUN 2
10-Jun-04	14:52:39	12.37	86.93	249.29	4.72	SCRUBBER A RUN 2
10-Jun-04	14:53:39	12.75	83.78	202.77	4.72	SCRUBBER A RUN 2
10-Jun-04	14:54:39	13.10	82.21	255.19	4.43	SCRUBBER A RUN 2
10-Jun-04	14:55:39	13.32	80.74	284.00	4.72	SCRUBBER A RUN 2
10-Jun-04	14:56:39	12.81	82.90	210.84	4.43	SCRUBBER A RUN 2
10-Jun-04	14:57:39	12.93	81.23	183.89	4.72	SCRUBBER A RUN 2
10-Jun-04	14:58:39	12.72	81.92	230.90	4.72	SCRUBBER A RUN 2
10-Jun-04	14:59:39	12.49	83.19	169.93	4.43	SCRUBBER A RUN 2
10-Jun-04	15:00:39	12.47	82.80	166.98	4.72	SCRUBBER A RUN 2
10-Jun-04	15:01:39	12.33	83.29	190.87	4.43	SCRUBBER A RUN 2
10-Jun-04	15:02:39	12.57	84.57	177.99	4.43	SCRUBBER A RUN 2
10-Jun-04	15:03:39	12.07	84.77	139.84	4.72	SCRUBBER A RUN 2
10-Jun-04	15:04:39	12.21	83.78	163.93	4.13	SCRUBBER A RUN 2
10-Jun-04	15:05:39	12.20	85.85	173.86	3.84	SCRUBBER A RUN 2
10-Jun-04	15:06:39	12.47	85.85	200.91	4.43	SCRUBBER A RUN 2
10-Jun-04	15:07:39	11.97	83.98	166.98	4.72	SCRUBBER A RUN 2
10-Jun-04	15:08:39	11.78	85.85	143.97	4.43	SCRUBBER A RUN 2
10-Jun-04	15:09:39	12.39	83.59	151.83	4.43	SCRUBBER A RUN 2
10-Jun-04	15:10:39	12.25	82.90	145.05	3.84	SCRUBBER A RUN 2
10-Jun-04	15:11:39	11.97	87.13	137.97	4.43	SCRUBBER A RUN 2
10-Jun-04	15:12:39	12.01	88.21	145.93	4.72	SCRUBBER A RUN 2
10-Jun-04	15:13:39	11.67	91.16	137.08	4.43	SCRUBBER A RUN 2
10-Jun-04	15:14:39	11.67	89.09	122.04	4.72	SCRUBBER A RUN 2
10-Jun-04	15:15:39	11.49	89.68	130.99	4.72	SCRUBBER A RUN 2
10-Jun-04	15:16:39	11.91	87.23	137.97	4.13	SCRUBBER A RUN 2
10-Jun-04	15:17:39	12.52	85.06	158.91	4.43	SCRUBBER A RUN 2
10-Jun-04	15:18:39	12.51	85.55	179.86	4.13	SCRUBBER A RUN 2
10-Jun-04	15:19:39	11.55	87.82	133.15	4.72	SCRUBBER A RUN 2
10-Jun-04	15:20:39	11.87	87.32	126.07	4.72	SCRUBBER A RUN 2
10-Jun-04	15:21:39	11.80	86.73	151.93	4.13	SCRUBBER A RUN 2
10-Jun-04	15:22:39	12.50	87.72	182.91	4.43	SCRUBBER A RUN 2
10-Jun-04	15:23:39	12.53	86.44	179.86	4.43	SCRUBBER A RUN 2
10-Jun-04	15:24:39	12.39	87.03	181.04	4.43	SCRUBBER A RUN 2
10-Jun-04	15:25:39	11.95	89.88	171.80	4.43	SCRUBBER A RUN 2
10-Jun-04	15:26:39	11.70	91.45	139.84	4.43	SCRUBBER A RUN 2
10-Jun-04	15:27:39	12.00	89.19	154.00	4.43	SCRUBBER A RUN 2
10-Jun-04	15:28:39	12.04	88.01	157.05	3.84	SCRUBBER A RUN 2
10-Jun-04	15:29:39	12.06	89.49	178.88	4.72	SCRUBBER A RUN 2



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10-Jun-04		RAYNIER				Comments
Parameter	O2	NOx	CO	SO2		
Units	%V	ppmV	ppmV	ppmV		
10-Jun-04	15:30:39	11.77	90.27	156.95	3.54	SCRUBBER A RUN 2
10-Jun-04	15:31:39	11.84	91.26	144.95	4.13	SCRUBBER A RUN 2
10-Jun-04	15:32:39	12.08	88.60	141.90	4.43	SCRUBBER A RUN 2
10-Jun-04	15:33:39	12.34	87.32	161.96	4.13	SCRUBBER A RUN 2
10-Jun-04	15:34:39	12.38	86.14	206.81	4.13	SCRUBBER A RUN 2
10-Jun-04	15:35:39	12.91	81.52	225.88	4.72	SCRUBBER A RUN 2
10-Jun-04	15:36:39	13.71	77.49	292.06	4.13	SCRUBBER A RUN 2
10-Jun-04	15:37:39	13.69	77.69	244.08	4.43	SCRUBBER A RUN 2
10-Jun-04	15:38:39	13.14	81.23	208.87	4.13	SCRUBBER A RUN 2
10-Jun-04	15:39:39	13.23	78.47	211.72	4.43	SCRUBBER A RUN 2
10-Jun-04	15:40:39	13.46	78.28	226.87	4.13	SCRUBBER A RUN 2
10-Jun-04	15:41:39	13.33	78.18	216.93	4.43	SCRUBBER A RUN 2
10-Jun-04	15:45:24	12.95	-1.18	1.08	4.43	POST R2 O2=12.97
10-Jun-04	15:45:29	12.96	-1.08	0.00	4.13	POST R2 O2=12.97
10-Jun-04	15:45:34	12.96	-1.18	0.00	4.13	POST R2 O2=12.97
10-Jun-04	15:45:39	12.96	-1.08	0.00	4.13	POST R2 O2=12.97
10-Jun-04	15:45:44	12.96	-1.08	0.00	3.84	POST R2 O2=12.97
10-Jun-04	15:45:49	12.96	-1.18	0.00	4.43	POST R2 O2=12.97
10-Jun-04	15:48:15	0.08	94.70	97.85	4.13	NX=95 CO=96.8
10-Jun-04	15:48:20	0.08	94.60	97.75	4.72	NX=95 CO=96.8
10-Jun-04	15:48:25	0.09	94.70	97.85	4.43	NX=95 CO=96.8
10-Jun-04	15:48:30	0.10	94.99	97.75	4.43	NX=95 CO=96.8
10-Jun-04	15:48:35	0.11	94.50	97.85	4.43	NX=95 CO=96.8
10-Jun-04	15:48:40	0.13	94.70	97.85	4.43	NX=95 CO=96.8
10-Jun-04	15:50:48	0.07	180.29	312.06	4.28	CO=306 NX=181
10-Jun-04	15:50:53	0.07	180.20	313.14	3.98	CO=306 NX=181
10-Jun-04	15:50:58	0.07	180.20	313.14	4.28	CO=306 NX=181
10-Jun-04	15:51:03	0.07	180.29	312.06	3.98	CO=306 NX=181
10-Jun-04	15:51:08	0.07	180.39	312.06	4.28	CO=306 NX=181
10-Jun-04	15:51:13	0.07	180.59	312.06	4.57	CO=306 NX=181
10-Jun-04	15:51:18	0.07	180.69	312.06	4.28	CO=306 NX=181
10-Jun-04	15:51:23	0.07	180.59	312.06	4.28	CO=306 NX=181
10-Jun-04	16:34:14	0.48	-0.93	2.90	3.98	Test
10-Jun-04	16:34:19	0.49	-0.93	2.90	3.69	Test
10-Jun-04	16:34:24	0.49	-0.93	2.90	3.69	Test
10-Jun-04	17:34:09	12.26	81.03	141.99	4.13	SCRUBBER A R3
10-Jun-04	17:35:09	11.66	79.75	283.00	3.84	SCRUBBER A R3
10-Jun-04	17:36:09	11.41	80.44	250.16	3.84	SCRUBBER A R3
10-Jun-04	17:37:09	11.79	80.63	312.01	4.13	SCRUBBER A R3
10-Jun-04	17:38:09	12.06	80.04	145.93	3.84	SCRUBBER A R3
10-Jun-04	17:39:09	11.23	77.09	390.29	4.43	SCRUBBER A R3
10-Jun-04	17:40:09	11.00	78.08	635.23	3.84	SCRUBBER A R3
10-Jun-04	17:41:09	11.49	82.30	362.26	4.13	SCRUBBER A R3
10-Jun-04	17:42:09	11.62	80.34	189.88	4.13	SCRUBBER A R3

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10-Jun-04		RAYNIER				
	Parameter	O2	NOx	CO	SO2	Comments
	Units	%V	ppmV	ppmV	ppmV	
10-Jun-04	17:43:09	11.19	76.60	471.02	4.13	SCRUBBER A R3
10-Jun-04	17:44:09	11.22	78.27	446.14	4.13	SCRUBBER A R3
10-Jun-04	17:45:09	11.25	75.22	646.34	4.13	SCRUBBER A R3
10-Jun-04	17:46:09	11.74	79.26	680.27	3.84	SCRUBBER A R3
10-Jun-04	17:47:09	11.71	76.50	201.88	3.84	SCRUBBER A R3
10-Jun-04	17:48:09	11.64	75.42	291.17	3.84	SCRUBBER A R3
10-Jun-04	17:49:09	11.78	76.21	298.15	3.84	SCRUBBER A R3
10-Jun-04	17:50:09	11.92	76.60	239.25	4.13	SCRUBBER A R3
10-Jun-04	17:51:09	11.45	71.29	671.22	3.84	SCRUBBER A R3
10-Jun-04	17:52:09	11.51	71.09	746.45	4.43	SCRUBBER A R3
10-Jun-04	17:53:09	11.48	71.19	881.56	4.13	SCRUBBER A R3
10-Jun-04	17:54:09	11.64	75.42	686.27	4.13	SCRUBBER A R3
10-Jun-04	17:55:09	11.49	77.29	412.21	4.43	SCRUBBER A R3
10-Jun-04	17:56:09	11.93	78.47	202.86	3.54	SCRUBBER A R3
10-Jun-04	17:57:09	12.70	71.09	132.16	3.84	SCRUBBER A R3
10-Jun-04	17:58:09	12.49	71.49	121.15	4.72	SCRUBBER A R3
10-Jun-04	17:59:09	11.78	69.82	158.12	4.43	SCRUBBER A R3
10-Jun-04	18:00:09	11.74	76.99	181.13	4.13	SCRUBBER A R3
10-Jun-04	18:01:09	12.47	74.34	167.95	4.72	SCRUBBER A R3
10-Jun-04	18:02:09	12.64	74.34	171.00	4.43	SCRUBBER A R3
10-Jun-04	18:03:09	12.64	79.94	168.05	4.13	SCRUBBER A R3
10-Jun-04	18:04:09	12.37	81.81	149.17	4.72	SCRUBBER A R3
10-Jun-04	18:05:09	11.82	82.11	123.11	4.43	SCRUBBER A R3
10-Jun-04	18:06:09	11.63	83.29	160.09	4.72	SCRUBBER A R3
10-Jun-04	18:07:09	11.89	89.19	136.19	4.43	SCRUBBER A R3
10-Jun-04	18:08:09	11.46	83.98	141.11	4.13	SCRUBBER A R3
10-Jun-04	18:09:09	11.16	83.78	389.40	3.84	SCRUBBER A R3
10-Jun-04	18:10:09	11.22	83.20	217.83	3.84	SCRUBBER A R3
10-Jun-04	18:11:09	11.21	86.15	267.10	3.54	SCRUBBER A R3
10-Jun-04	18:12:09	11.94	85.66	136.01	3.54	SCRUBBER A R3
10-Jun-04	18:13:09	11.61	86.25	119.98	4.13	SCRUBBER A R3
10-Jun-04	18:14:09	11.74	83.49	155.87	4.43	SCRUBBER A R3
10-Jun-04	18:15:09	12.10	84.18	137.98	4.13	SCRUBBER A R3
10-Jun-04	18:16:09	12.94	78.87	145.06	4.43	SCRUBBER A R3
10-Jun-04	18:17:09	13.03	76.81	133.16	4.13	SCRUBBER A R3
10-Jun-04	18:18:09	12.07	79.07	126.08	3.54	SCRUBBER A R3
10-Jun-04	18:19:09	12.18	82.61	128.04	4.13	SCRUBBER A R3
10-Jun-04	18:20:09	12.36	83.69	133.16	4.13	SCRUBBER A R3
10-Jun-04	18:21:09	12.07	81.13	124.01	3.84	SCRUBBER A R3
10-Jun-04	18:22:09	12.99	79.56	151.94	4.13	SCRUBBER A R3
10-Jun-04	18:23:09	12.91	80.25	141.02	3.84	SCRUBBER A R3
10-Jun-04	18:24:09	12.47	82.51	127.06	4.13	SCRUBBER A R3
10-Jun-04	18:25:09	11.98	83.89	137.98	4.13	SCRUBBER A R3
10-Jun-04	18:26:09	11.52	83.79	251.27	3.54	SCRUBBER A R3

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10-Jun-04		RAYNIER				Comments
Parameter		O2	NOx	CO	SO2	
Units		%V	ppmV	ppmV	ppmV	
10-Jun-04	18:27:09	11.95	84.97	119.09	4.13	SCRUBBER A R3
10-Jun-04	18:28:09	12.26	81.92	106.01	4.13	SCRUBBER A R3
10-Jun-04	18:29:09	12.04	80.64	107.10	3.84	SCRUBBER A R3
10-Jun-04	18:30:09	12.82	76.81	150.07	3.84	SCRUBBER A R3
10-Jun-04	18:31:09	12.58	78.48	131.09	4.43	SCRUBBER A R3
10-Jun-04	18:32:09	12.20	78.38	118.11	4.13	SCRUBBER A R3
10-Jun-04	18:33:09	11.82	77.40	181.05	4.13	SCRUBBER A R3
10-Jun-04	18:34:09	11.88	82.31	154.01	4.43	SCRUBBER A R3
10-Jun-04	18:38:38	0.28	182.72	311.85	4.13	NX=181 CO=306
10-Jun-04	18:38:43	0.28	183.02	312.93	3.84	NX=181 CO=306
10-Jun-04	18:38:48	0.29	182.52	312.83	4.43	NX=181 CO=306
10-Jun-04	18:38:53	0.27	182.82	312.93	4.13	NX=181 CO=306
10-Jun-04	18:38:58	0.28	182.72	311.85	3.84	NX=181 CO=306
10-Jun-04	18:39:03	0.27	182.92	311.75	4.13	NX=181 CO=306
10-Jun-04	18:39:08	0.27	182.82	310.86	3.84	NX=181 CO=306
10-Jun-04	18:39:13	0.27	182.82	310.86	4.43	NX=181 CO=306
10-Jun-04	18:39:18	0.28	183.02	311.85	4.43	NX=181 CO=306
10-Jun-04	18:39:23	0.28	183.21	311.85	3.84	NX=181 CO=306
10-Jun-04	18:39:28	0.27	182.92	311.75	3.84	NX=181 CO=306
10-Jun-04	18:39:33	0.29	182.82	311.75	3.84	NX=181 CO=306
10-Jun-04	18:39:38	0.27	182.92	312.83	3.84	NX=181 CO=306
10-Jun-04	18:39:43	0.26	182.92	312.83	4.13	NX=181 CO=306
10-Jun-04	18:39:48	0.27	182.72	312.93	4.13	NX=181 CO=306
10-Jun-04	18:39:53	0.28	182.62	312.93	3.84	NX=181 CO=306
10-Jun-04	18:39:58	0.27	182.72	312.93	3.84	NX=181 CO=306
10-Jun-04	18:41:28	0.26	95.79	98.64	4.13	NX=95 CO=96.8
10-Jun-04	18:41:33	0.27	95.59	98.54	3.54	NX=95 CO=96.8
10-Jun-04	18:41:38	0.26	95.49	97.56	3.84	NX=95 CO=96.8
10-Jun-04	18:41:43	0.25	95.69	97.56	3.84	NX=95 CO=96.8
10-Jun-04	18:41:48	0.27	95.88	97.56	4.13	NX=95 CO=96.8
10-Jun-04	18:43:07	13.15	-0.79	5.70	3.84	O2=12.97
10-Jun-04	18:43:12	13.14	-0.89	0.79	4.13	O2=12.97
10-Jun-04	18:43:17	13.15	-0.98	-0.39	3.84	O2=12.97
10-Jun-04	18:43:22	13.13	-0.89	-0.30	4.13	O2=12.97
10-Jun-04	18:43:27	13.14	-0.98	-0.30	3.84	O2=12.97

**APPENDIX B**  
**CALIBRATION DATA AND CERTIFICATES**



P. O. Box 12013  
Research Triangle Park, N.C. 27709  
Phone 919/544-3772

### CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS MIXTURE

Customer:	National Welders, Raleigh, NC	Reference #	88-87696
NSG PO#	4179631	Certification Date:	12/01/03
Customer PO#		Expiration Date:	12/01/06
Cylinder #	CC52162	Pressure, psig*	2000

#### ANALYTICAL INFORMATION

METHOD: This standard was analyzed according to EPA Traceability Protocol for Assay and certification of Gaseous Calibration  
Standards: Procedure G-1: September 1997.

#### ANALYZED CYLINDER

<u>Components</u>	<u>Certified Concentration</u>	<u>Analytical Accuracy**</u>
Oxygen	19.99%	+/-1%

Balance - Nitrogen

#### REFERENCE STANDARD

<u>Type/SRM Sample #</u>	<u>Cylinder #</u>	<u>Concentration</u>
GMIS ( Traceable to SRM # 2659a )	CC46336	20.04 % O2/N2

#### INSTRUMENTATION

<u>Instrument/Model/Serial #</u>	<u>Last Date Calibrated</u>	<u>Analytical Method</u>
Horiba MPA - 510 O2 41499150042	11/21/03	Paramagnetic

Analyst: Brian P. Moore Brian P. Moore

This report states accurately the results of the investigation made upon the material submitted to the analytical laboratory. Every effort has been made to determine objectively the information requested. However, in connection with this report, National Specialty Gases shall have no liability in excess of established charge for this service. Assayed at National Specialty Gases, 630 United Drive, Durham, NC 27713 (919) 544-3772

\*Do not use this standard when cylinder pressure is below 150 psig.

\*\*Analytical accuracy includes typical known error sources which, at least, include precision of the analytical instrument.

NSG 020149L



P. O. Box 12013  
Research Triangle Park, N.C. 27709  
Phone 919/544-3772

**CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS MIXTURE**

Customer:	National Welders, Raleigh, NC	Reference #	88-87312
NSG PO#	4159962	Certification Date:	11/06/03
Customer PO#		Expiration Date:	11/06/05
Cylinder #	CC129687	Pressure, psig*	2000

**ANALYTICAL INFORMATION**

METHOD: This standard was analyzed according to EPA Traceability Protocol for Assay and certification of Gaseous Calibration Standards: Procedure G-1: September 1997.

ANALYZED CYLINDER

<u>Components</u>	<u>Certified Concentration</u>	<u>Analytical Accuracy**</u>
Sulfur Dioxide	248 ppm	+/-1%

Balance - Nitrogen

REFERENCE STANDARD

<u>Type/SRM Sample #</u>	<u>Cylinder #</u>	<u>Concentration</u>
GMIS ( Traceable to SRM # 1661a )	CC117042	495.6 ppm SO2/N2

INSTRUMENTATION

<u>Instrument/Model/Serial #</u>	<u>Last Date Calibrated</u>	<u>Analytical Method</u>
Rosemount 890 SO2 00032	10/06/03	Ultraviolet

Analyst: Jeremy Kenworthy Jeremy Kenworthy

This report states accurately the results of the investigation made upon the material submitted to the analytical laboratory. Every effort has been made to determine objectively the information requested. However, in connection with this report, National Specialty Gases shall have no liability in excess of established charge for this service. Assayed at National Specialty Gases, 630 United Drive, Durham, NC 27713 (919) 544-3772

\*Do not use this standard when cylinder pressure is below 150 psig.

\*\*Analytical accuracy includes typical known error sources which, at least, include precision of the analytical instrument.



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**CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS MIXTURE**

Customer:	National Welders, Raleigh, NC	Reference #	88-87874
NSG PO#	4179631	Certification Date:	12/09/03
Customer PO#		Expiration Date:	12/09/05
Cylinder #	SG9151511BAL	Pressure, psig*	2000

**ANALYTICAL INFORMATION**

METHOD: This standard was analyzed according to EPA Traceability Protocol for Assay and certification of Gaseous Calibration Standards: Procedure G-1: September 1997.

**ANALYZED CYLINDER**

<u>Components</u>	<u>Certified Concentration</u>	<u>Analytical Accuracy**</u>
Nitric Oxide	22.7 ppm	+/-1%
Carbon Monoxide	31.7 ppm	+/-1%
Balance - Nitrogen	Trace Gas - Nitrogen Dioxide	0.22 ppm

**REFERENCE STANDARD**

<u>Type/SRM Sample #</u>	<u>Cylinder #</u>	<u>Concentration</u>
GMIS ( Traceable to SRM # 2628a )	CC27585	20.01 ppm NO/N2
GMIS ( Traceable to SRM # 2635a )	CC47611	25.45 ppm CO/N2

**INSTRUMENTATION**

<u>Instrument/Model/Serial #</u>	<u>Last Date Calibrated</u>	<u>Analytical Method</u>
TECO 42CHL NOX CHL-63965-341	11/14/03	Chemiluminescence
Rosemount 880A CO 00172	11/21/03	Non-dispersive Infrared

Analyst: Jeremy Kenworthy Jeremy Kenworthy

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### CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS MIXTURE

Customer:	National Welders, Raleigh, NC	Reference #	88-87830
NSG PO#	4179631	Certification Date:	12/08/03
Customer PO#		Expiration Date:	12/08/06
Cylinder #	SG906771ALB	Pressure, psig*	2000

#### ANALYTICAL INFORMATION

METHOD: This standard was analyzed according to EPA Traceability Protocol for Assay and certification of Gaseous Calibration Standards: Procedure G-1: September 1997.

#### ANALYZED CYLINDER

<u>Components</u>	<u>Certified Concentration</u>	<u>Analytical Accuracy**</u>
Oxygen	12.98%	+/-1%
Balance - Nitrogen		

#### REFERENCE STANDARD

<u>Type/SRM Sample #</u>	<u>Cylinder #</u>	<u>Concentration</u>
GMIS ( Traceable to SRM # 2659a )	CC104352	20.97 % O2/N2

#### INSTRUMENTATION

<u>Instrument/Model/Serial #</u>	<u>Last Date Calibrated</u>	<u>Analytical Method</u>
Horiba MPA - 510 O2 41499150042	11/21/03	Paramagnetic

Analyst: Jeremy Kenworthy Jeremy Kenworthy

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## CERTIFICATE OF ANALYSIS

## EPA PROTOCOL MIXTURE

PROCEDURE #: G1

CUSTOMER: Source Testing & Consulting, Serv.  
SGI ORDER #: 0010831  
ITEM#: 8  
P.O.#: VERBAL-BILL

CYLINDER #: CC-94629  
CYLINDER PRES: 2000 PSIG  
CGA OUTLET: 350

CERTIFICATION DATE: 8/30/2001

EXPIRATION DATE: 8/30/2004

### CERTIFICATION HISTORY

COMPONENT	DATE OF ASSAY	MEAN CONCENTRATION	CERTIFIED CONCENTRATION	ANALYTICAL ACCURACY
Carbon Monoxide	7/23/2001 8/30/2001	61.31 ppm 61.01 ppm	61.2 ppm	+/- 1%

BALANCE Nitrogen

PREVIOUS CERTIFICATION DATES: None


### REFERENCE STANDARDS

COMPONENT	SRM/NTRM#	CYLINDER#	CONCENTRATION
Carbon Monoxide	NTRM-81679	CC88359	97.4 ppm

### INSTRUMENTATION

COMPONENT	MAKE/MODEL	SERIAL #	DETECTOR	CALIBRATION DATE(S)
Carbon Monoxide	Horiba VIA-510	570423011	NDIR	8/20/2001

THIS STANDARD IS NIST TRACEABLE. IT WAS CERTIFIED ACCORDING TO THE EPA PROTOCOL PROCEDURES.  
DO NOT USE THIS STANDARD IF THE CYLINDER PRESSURE IS LESS THAN 150 PSIG.

ANALYST:   
REX JOHNSON

DATE: 8/30/2001



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### CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS MIXTURE

Customer:	National Welders, Raleigh, NC	Reference #	88-88043
NSG PO#	4179631	Certification Date:	12/19/03
Customer PO#		Expiration Date:	12/19/05
Cylinder #	CC61580	Pressure, psig*	2000

#### ANALYTICAL INFORMATION

METHOD: This standard was analyzed according to EPA Traceability Protocol for Assay and certification of Gaseous Calibration Standards: Procedure G-1: September 1997.

#### ANALYZED CYLINDER

<u>Components</u>	<u>Certified Concentration</u>	<u>Analytical Accuracy**</u>
Nitric Oxide	181.4 ppm	+/-1%
Carbon Monoxide	306 ppm	+/-1%
Balance - Nitrogen	Trace Gas - Nitrogen Dioxide	0.1 ppm

#### REFERENCE STANDARD

<u>Type/SRM Sample #</u>	<u>Cylinder #</u>	<u>Concentration</u>
GMIS ( Traceable to SRM # 1685b )	CC109646	205.2 ppm NO/N2
GMIS ( Traceable to SRM # 2638a )	CC104278	251.5 ppm CO/N2

#### INSTRUMENTATION

<u>Instrument/Model/Serial #</u>	<u>Last Date Calibrated</u>	<u>Analytical Method</u>
KVB Analect EN-844	12/01/03	Fourier Transform Infrared
Rosemount 880A CO 00172	11/21/03	Non-dispersive Infrared

Analyst: Jeremy Kerworthy Jeremy Kerworthy

This report states accurately the results of the investigation made upon the material submitted to the analytical laboratory. Every effort has been made to determine objectively the information requested. However, in connection with this report, National Specialty Gases shall have no liability in excess of established charge for this service. Assayed at National Specialty Gases, 630 United Drive, Durham, NC 27713 (919) 544-3772

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### CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS MIXTURE

Customer:	National Welders, Raleigh, NC	Reference #	88-87830
NSG PO#	4179631	Certification Date:	12/08/03
Customer PO#		Expiration Date:	12/08/06
Cylinder #	CC61579	Pressure, psig*	2000

#### ANALYTICAL INFORMATION

METHOD: This standard was analyzed according to EPA Traceability Protocol for Assay and certification of Gaseous Calibration Standards: Procedure G-1: September 1997.

#### ANALYZED CYLINDER

<u>Components</u>	<u>Certified Concentration</u>	<u>Analytical Accuracy**</u>
Oxygen	12.97%	+/-1%
Balance - Nitrogen		

#### REFERENCE STANDARD

<u>Type/SRM Sample #</u>	<u>Cylinder #</u>	<u>Concentration</u>
GMIS ( Traceable to SRM # 2659a )	CC104352	20.97 % O2/N2

#### INSTRUMENTATION

<u>Instrument/Model/Serial #</u>	<u>Last Date Calibrated</u>	<u>Analytical Method</u>
Horiba MPA - 510 O2 41499150042	11/21/03	Paramagnetic

Analyst: Jeremy Kenworthy Jeremy Kenworthy

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### CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS MIXTURE

Customer:	National Welders; Raleigh, NC	Reference #	88-87977
NSG PO#	4179631	Certification Date:	12/15/03
Customer PO#		Expiration Date:	12/15/05
Cylinder #	CC41493	Pressure, psig*	2000

#### ANALYTICAL INFORMATION

METHOD: This standard was analyzed according to EPA Traceability Protocol for Assay and certification of Gaseous Calibration Standards: Procedure G-1: September 1997.

#### ANALYZED CYLINDER

Components	Certified Concentration	Analytical Accuracy**
Nitric Oxide	907 ppm	+/-1%
Carbon Monoxide	904 ppm	+/-1%
Balance - Nitrogen	Trace Gas - Nitrogen Dioxide	< 1.0 ppm

#### REFERENCE STANDARD

Type/SRM Sample #	Cylinder #	Concentration
GMIS ( Traceable to SRM # 1687b )	CC129690	997 ppm NO/N2
GMIS ( Traceable to SRM # 1681b )	CC21531	975.8 ppm CO/N2

#### INSTRUMENTATION

Instrument/Model/Serial #	Last Date Calibrated	Analytical Method
KVB Analect EN-844	12/01/03	Fourier Transform Infrared
Rosemount 880A CO 00172	11/21/03	Non-dispersive Infrared

Analyst: Jeremy Kenworthy Jeremy Kenworthy

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### CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS MIXTURE

Customer:	National Welders, Raleigh, NC	Reference #	88-90433
NSG PO#	4368226	Certification Date:	05/04/04
Customer PO#		Expiration Date:	05/04/06
Cylinder #	CC129538	Pressure, psig*	2000

#### ANALYTICAL INFORMATION

METHOD: This standard was analyzed according to EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards: Procedure G1 (September 1997)

#### ANALYZED CYLINDER

<u>Components</u>	<u>Certified Concentration</u>	<u>Analytical Accuracy**</u>
Sulfur Dioxide	46.7 ppm	+/-1%

Balance - Nitrogen

#### REFERENCE STANDARD

<u>Type/SRM Sample #</u>	<u>Cylinder #</u>	<u>Concentration</u>
GMIS ( Traceable to SRM # 1693a )	SG9142444BAL	50.2 ppm SO2/N2

#### INSTRUMENTATION

<u>Instrument/Model/Serial #</u>	<u>Last Date Calibrated</u>	<u>Analytical Method</u>
Rosemount 890 SO2 00032	04/14/04	Ultraviolet

Analyst: Jeremy Kenworthy Jeremy Kenworthy

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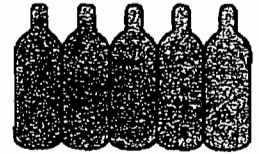
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## CERTIFICATE OF ANALYSIS

## EPA PROTOCOL MIXTURE

PROCEDURE #: G1

**CUSTOMER:** Source Testing & Consulting Serv.  
**SGI ORDER #:** 0035478  
**ITEM#:** 2  
**P.O.#:** 200-347

**CYLINDER #:** CC-118950  
**CYLINDER PRES:** 2000 PSIG  
**CGA OUTLET:** 660

**CERTIFICATION DATE:** 03/24/2003  
**EXPIRATION DATE:** 3/20/2005

### CERTIFICATION HISTORY

COMPONENT	DATE OF ASSAY	MEAN CONCENTRATION	CERTIFIED CONCENTRATION	ANALYTICAL ACCURACY
Carbon Monoxide	03/13/2003	45.92 ppm	46.0 ppm	+/- 1%
	03/24/2003	45.99 ppm		
Nitric Oxide	03/13/2003	46.13 ppm	46.2 ppm	+/- 1%
	03/20/2003	46.3 ppm		
NOx			46.7 ppm	Reference Value Only

**BALANCE** Nitrogen

**PREVIOUS CERTIFICATION DATES:** None

### REFERENCE STANDARDS

COMPONENT	SRM/NTRM#	CYLINDER#	CONCENTRATION
Carbon Monoxide	NTRM-31001	CC-134716	101.0 ppm
Nitric Oxide	NTRM-82660	CC-133646	99.5 ppm

### INSTRUMENTATION

COMPONENT	MAKE/MODEL	SERIAL #	DETECTOR	CALIBRATION DATE(S)
Carbon Monoxide	Horiba VIA-510	570423011	NDIR	03/03/2003
Nitric Oxide	CAI-400-CLD	6L09004	Cheml	03/06/2003

THIS STANDARD ISNIST TRACEABLE. IT WAS CERTIFIED ACCORDING TO THE EPA PROTOCOL PROCEDURES.  
DO NOT USE THIS STANDARD IF THE CYLINDER PRESSURE IS LESS THAN 150 PSIG.

**ANALYST:** *Cheryl Patino*  
CHERYL PATINO

**DATE:** 03/24/2003

## CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS MIXTURE

Customer:	National Welders, Raleigh, NC	Reference #	88-87879
NSG PO#	4179631	Certification Date:	12/09/03
Customer PO#		Expiration Date:	12/09/05
Cylinder #	SG9148880BAL	Pressure, psig*	2000

### ANALYTICAL INFORMATION

METHOD: This standard was analyzed according to EPA Traceability Protocol for Assay and certification of Gaseous Calibration Standards: Procedure G-1: September 1997.

### ANALYZED CYLINDER

<u>Components</u>	<u>Certified Concentration</u>	<u>Analytical Accuracy**</u>
Nitric Oxide	11.28 ppm	+/-1%
Carbon Monoxide	15.62 ppm	+/-1%
Balance - Nitrogen	Trace Gas - Nitrogen Dioxide	0.37 ppm

### REFERENCE STANDARD

<u>Type/SRM Sample #</u>	<u>Cylinder #</u>	<u>Concentration</u>
GMIS ( Traceable to SRM # 2628a )	CC16646	10.88 ppm NO/N2
GMIS ( Traceable to SRM # 1677c )	CC112168	10.31 ppm CO/N2

### INSTRUMENTATION

<u>Instrument/Model/Serial #</u>	<u>Last Date Calibrated</u>	<u>Analytical Method</u>
TECO 42CHL NOX CHL-63965-341	11/14/03	Chemiluminescence
Rosemount 880A CO 00172	11/21/03	Non-dispersive Infrared

Analyst: \_\_\_\_\_ Jeremy Kenworthy

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**CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS MIXTURE**

Customer:	National Welders, Raleigh, NC	Reference #	88-87982
NSG PO#	4179631	Certification Date:	12/12/03
Customer PO#		Expiration Date:	12/12/05
Cylinder #	CC60055	Pressure, psig*	2000

**ANALYTICAL INFORMATION**

METHOD: This standard was analyzed according to EPA Traceability Protocol for Assay and certification of Gaseous Calibration Standards: Procedure G-1: September 1997.

**ANALYZED CYLINDER**

<u>Components</u>	<u>Certified Concentration</u>	<u>Analytical Accuracy**</u>
Nitric Oxide	456 ppm	+/-1%
Carbon Monoxide	619 ppm	+/-1%
Balance - Nitrogen	Trace Gas - Nitrogen Dioxide	< 1.0 ppm

**REFERENCE STANDARD**

<u>Type/SRM Sample #</u>	<u>Cylinder #</u>	<u>Concentration</u>	
GMIS ( Traceable to SRM # 1686b )	CC16989	502.6 ppm	NO/N2
GMIS ( Traceable to SRM # 1680b )	CC47351	497.7 ppm	CO/N2

**INSTRUMENTATION**

<u>Instrument/Model/Serial #</u>	<u>Last Date Calibrated</u>	<u>Analytical Method</u>
KVB Analect EN-844	12/01/03	Fourier Transform Infrared
Rosemount 880A CO 00172	11/21/03	Non-dispersive Infrared

Analyst: \_\_\_\_\_ Jeremy Kenworthy

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## CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS MIXTURE

Customer:	National Welders, Durham, NC	Reference #	88-90594
NSG PO#	4377631	Certification Date:	05/10/04
Customer PO#		Expiration Date:	05/10/06
Cylinder #	CC59954	Pressure, psig*	2000

### ANALYTICAL INFORMATION

METHOD: This standard was analyzed according to EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards: Procedure G1 (September 1997)

### ANALYZED CYLINDER

<u>Components</u>	<u>Certified Concentration</u>	<u>Analytical Accuracy**</u>
Carbon Monoxide	96.8 ppm	+/-1%
Nitric Oxide	95.0 ppm	+/-1%
Balance - Nitrogen	Trace Gas - Nitrogen Dioxide	< 0.1 ppm

### REFERENCE STANDARD

<u>Type/SRM Sample #</u>	<u>Cylinder #</u>	<u>Concentration</u>
GMIS ( Traceable to SRM # 1679c )	CC64442	98.3 ppm CO/N2
GMIS ( Traceable to SRM # 1684b )	CC64261	99.85 ppm NO/N2

### INSTRUMENTATION

<u>Instrument/Model/Serial #</u>	<u>Last Date Calibrated</u>	<u>Analytical Method</u>
Rosemount 880A CO 00172	04/22/04	Non-dispersive Infrared
KVB Analect EN-844	05/03/04	Fourier Transform Infrared

Analyst: \_\_\_\_\_ Jeremy Kenworthy

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## CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS MIXTURE

Customer:	National Welders, Raleigh, NC	Reference #	88-87875
NSG PO#	4179631	Certification Date:	12/09/03
Customer PO#		Expiration Date:	12/09/05
Cylinder #	CC36062	Pressure, psig*	2000

### ANALYTICAL INFORMATION

METHOD: This standard was analyzed according to EPA Traceability Protocol for Assay and certification of Gaseous Calibration Standards: Procedure G-1: September 1997.

### ANALYZED CYLINDER

<u>Components</u>	<u>Certified Concentration</u>	<u>Analytical Accuracy**</u>
Sulfur Dioxide	452 ppm	+/-1%

Balance - Nitrogen

### REFERENCE STANDARD

<u>Type/SRM Sample #</u>	<u>Cylinder #</u>	<u>Concentration</u>
GMIS ( Traceable to SRM # 1661a )	CC117042	495.6 ppm SO2/N2

### INSTRUMENTATION

<u>Instrument/Model/Serial #</u>	<u>Last Date Calibrated</u>	<u>Analytical Method</u>
KVB Analect EN-844	12/01/03	Fourier Transform Infrared

Analyst: \_\_\_\_\_ Jeremy Kenworthy

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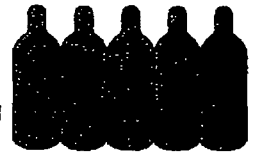
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## RECERTIFICATION OF ANALYSIS

## EPA PROTOCOL MIXTURE

PROCEDURE #: G1

CUSTOMER: Source Testing & Consulting Serv.  
SGI ORDER #: 0025214  
ITEM#: 1  
P.O.#: 200297

CYLINDER #: CC-114035  
CYLINDER PRES: 1700 PSIG  
CGA OUTLET: 660

CERTIFICATION DATE: 8/7/2002

EXPIRATION DATE: 8/7/2004

### CERTIFICATION HISTORY

COMPONENT	DATE OF ASSAY	MEAN CONCENTRATION	CERTIFIED CONCENTRATION	ANALYTICAL ACCURACY
Sulfur Dioxide	1/29/2002	25.00 ppm	24.9 ppm	+/- 1%
	8/7/2002	24.85 ppm		

BALANCE: Nitrogen

PREVIOUS CERTIFICATION DATES: 1/29/02 by Spectra Gases

### REFERENCE STANDARDS

COMPONENT	SRM/NTRM#	CYLINDER#	CONCENTRATION
Sulfur Dioxide	NTRM-81694	CC-53335	96.0 ppm

### INSTRUMENTATION

COMPONENT	MAKE/MODEL	SERIAL #	DETECTOR	CALIBRATION DATE(S)
Sulfur Dioxide	Horiba VIA-510	851221093	NDIR	7/18/2002

THIS STANDARD IS NIST TRACEABLE. IT WAS CERTIFIED ACCORDING TO THE EPA PROTOCOL PROCEDURES.  
DO NOT USE THIS STANDARD IF THE CYLINDER PRESSURE IS LESS THAN 150 PSIG.

ANALYST:       *FP*        
FRED PIKULA

DATE:       8/7/2002

**APPENDIX C**  
**PROJECT PARTICIPANTS**

**PROJECT PARTICIPANTS**

**STACS**

Bill Mayhew	Project Manager
Geoff Johnson	Environmental Scientist
Jon Proulx	Environmental Scientist
Lee Garcia	Environmental Scientist
Sid Carter	Environmental Technician
Aaron Harden	Document Coordinator

**RAYONIER**

Dick Hopper	Environmental Director
Ronnie Moore	Coordinator

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

3. \_\_\_\_\_

1. BRUCE MITCHELL

2. DARM - TALLY

2. MS 5505

5. \_\_\_\_\_

PLEASE PREPARE REPLY FOR:

\_\_\_\_ SECRETARY'S SIGNATURE

\_\_\_\_ DIV/DIST DIR SIGNATURE

\_\_\_\_ MY SIGNATURE

\_\_\_\_ YOUR SIGNATURE

\_\_\_\_ DUE DATE \_\_\_\_\_

ACTION/DISPOSITION

DISCUSS WITH ME

COMMENTS/ADVISE

\_\_\_\_ REVIEW AND RETURN

\_\_\_\_ SET UP MEETING

\_\_\_\_ FOR YOUR INFORMATION

\_\_\_\_ HANDLE APPROPRIATELY

\_\_\_\_ INITIAL AND FORWARD

\_\_\_\_ SHARE WITH STAFF

\_\_\_\_ FOR YOUR FILES

COMMENTS:

RECEIVED

SEP 15 2005

BUREAU OF AIR REGULATION

FROM: KHALID AL-NAHDY DATE: 9/13/05 PHONE: S/C 804-3243

**EMISSION TEST REPORT  
FOR  
SULFITE RECOVERY BOILER  
AND  
A & B SCRUBBERS WITH  
POWER BOILERS 1, 2, & 3  
AT  
RAYONIER  
FERNANDINA BEACH, FLORIDA**

**Prepared for:**

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**June 2004**

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## **1.0 INTRODUCTION**

## 1.0 INTRODUCTION

Under contract to Rayonier, Source Testing And Consulting Services, Inc. (STACS) performed a series of emission tests at Rayonier's Fernandina Beach, Florida facility. Emissions testing was performed for the Sulfite Recovery Boiler and for Power Boilers #1, #2, and #3. The purpose of the tests was to demonstrate ongoing compliance with the emissions limits for particulate matter and for visible emissions for the units.

Two venturi-wet scrubbers (A and B) control emissions from the three power boilers. Emissions from Power Boilers #1 and #2 were routed through "A" Scrubber while Power Boiler #3 was routed through "B" Scrubber during the testing. Power Boiler #1 was operated on residual (No. 6 fuel oil) oil and Power Boilers #2 and #3 were operated burning bark supplemented by fuel oil as required to maintain load. Emissions from the Recovery Boiler are controlled through good combustion practices and the use of a Katzan Wet Scrubber/Brinks Demister.

All testing followed the procedures and quality control guidelines given in EPA Method 5 (40 CFR Pt 60, Appendix A). EPA Methods 1 through 4 were used in support of EPA Method 5. EPA Method 9 was used to determine visible emissions.

Sampling was performed on June 9, 2004 for the B-Scrubber, on June 10, 2004 for A-Scrubber and on May 24, 2004 for the Recovery Boiler. Additional testing was performed on May 25, 2004 on the Recovery Boiler strictly for calibration of a fixed particulate monitor.

Section 2.0 of this report provides a brief process description and a diagram of the sample point locations. Section 3.0 presents the test results. Section 4.0 outlines the procedures

and test methods used and Section 5.0 discusses the quality assurance/quality control measures followed during sampling and analysis. Field data sheets, laboratory data, sample calculations, calibration data, process data, and a list of project participants are included in the Appendices to this report.

## **2.0 PROCESS DESCRIPTION AND SAMPLE POINT LOCATIONS**

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### **2.1 POWER BOILERS 1, 2 & 3 WITH SCRUBBERS A AND B**

Particulate matter emissions from Power Boilers 1, 2, and 3 are controlled by one of two venturi type scrubbers with entrained water demisters downstream of the venturi. Power Boilers 2 and 3 are furnace type boilers capable of burning bark or Number 6 fuel oil. During the test series, Power Boilers 2 and 3 were fired with bark supplemented by oil to maintain load as required. Power Boiler 1 is a furnace type boiler that burns only Number 6 fuel oil.

The maximum allowable particulate emission for Power Boiler 3 through "B" Scrubber is 50.6 lb/hr while burning Hog fuel (pine bark and wood refuse), and 16.7 lb/hr when burning oil. Boiler #1 is limited to a maximum of 16.0 lb/hr particulate matter emissions burning oil. Boiler #2 is limited to 50.6 lb/hr of particulate matter on Hog fuel. Therefore, "A" Scrubber with Power Boilers 1 & 2 in operation has a maximum combined limit of 66.6 lb/hr of particulate matter.

The FDEP permit also requires that the units be operated at 90% or greater of full load during emissions testing. Copies of the process operating data collected during testing are included in Appendix D to document load conditions.

The identical scrubber stacks are 10' in inside diameter and are sampled through two ports 90° apart around the circumference of the stack. The nearest downstream disturbance from the sampling location was the atmospheric exhaust which was located

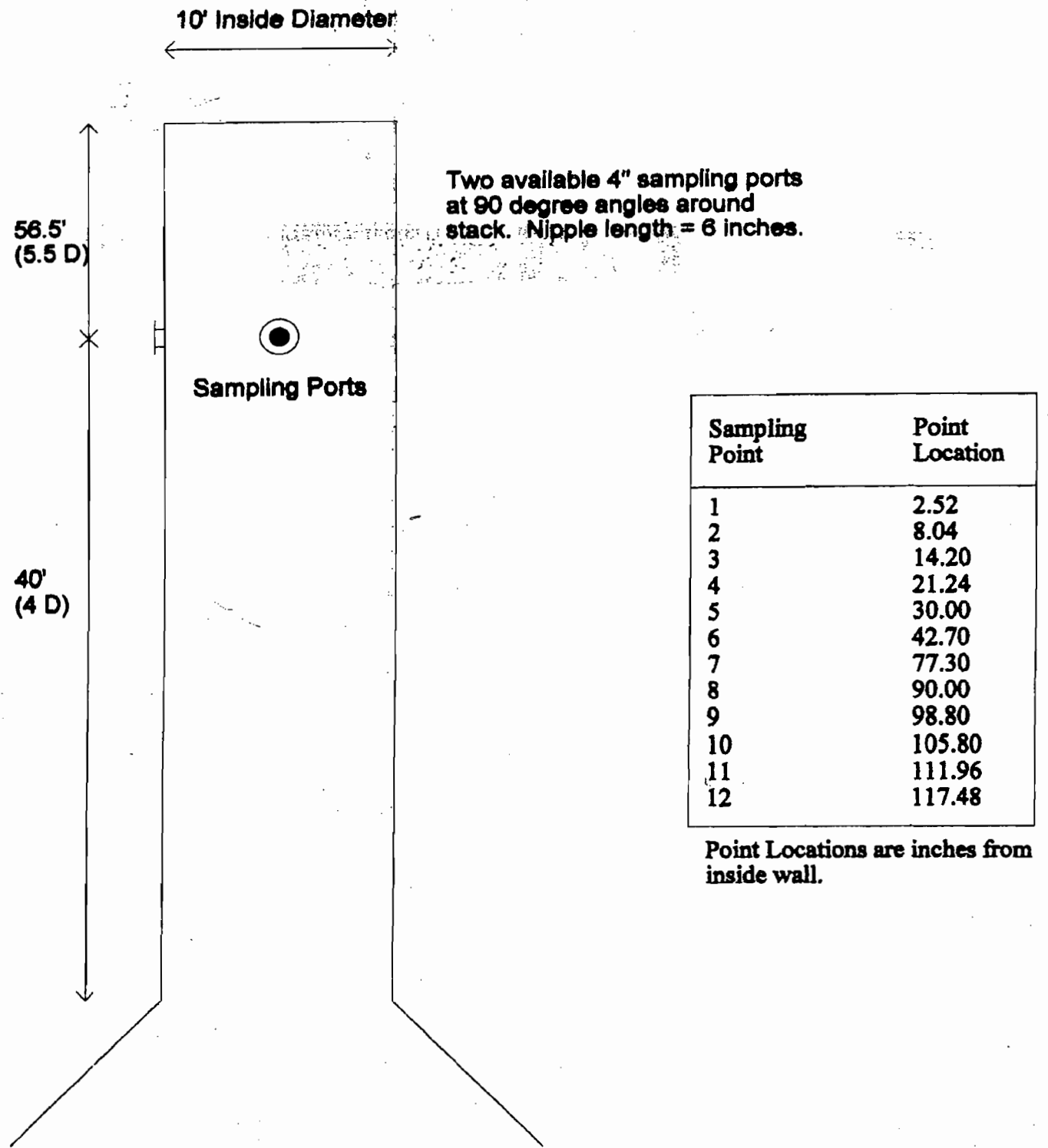
one duct diameter away from the test ports. The nearest upstream disturbance was the top of the scrubber which was four diameters away from the ports. Using this criteria and EPA Method 1 guidelines, 12 sample points per traverse diameter were used, for a total of 24 points. A schematic diagram typical of the stack sampling location is included in Figure 2-1.

## **2.2 SULFITE RECOVERY BOILER**

The Sulfite Recovery Boiler produces steam by the combustion of spent sulfite liquor (SSL). Particulate matter emissions from the unit are controlled by venting the effluent gases through a Katzen wet scrubber followed by venting the effluent gases through a series of Brinks mist filters.

The maximum allowable particulate mass emission rate for the sulfite recovery boiler is 67.5 lb/hr. The FDEP permit also requires that the units be operated at 90% or greater of full load during emissions testing. Copies of the process operating data collected during testing are included in Appendix D to document load conditions.

Figure 2-2 presents a schematic diagram of the emissions sampling location. Based on EPA Method 1 criteria, the location requires 12 sampling points (6 on each diameter).



**Figure 2-1. A & B Scrubber Stack Schematic Diagram**



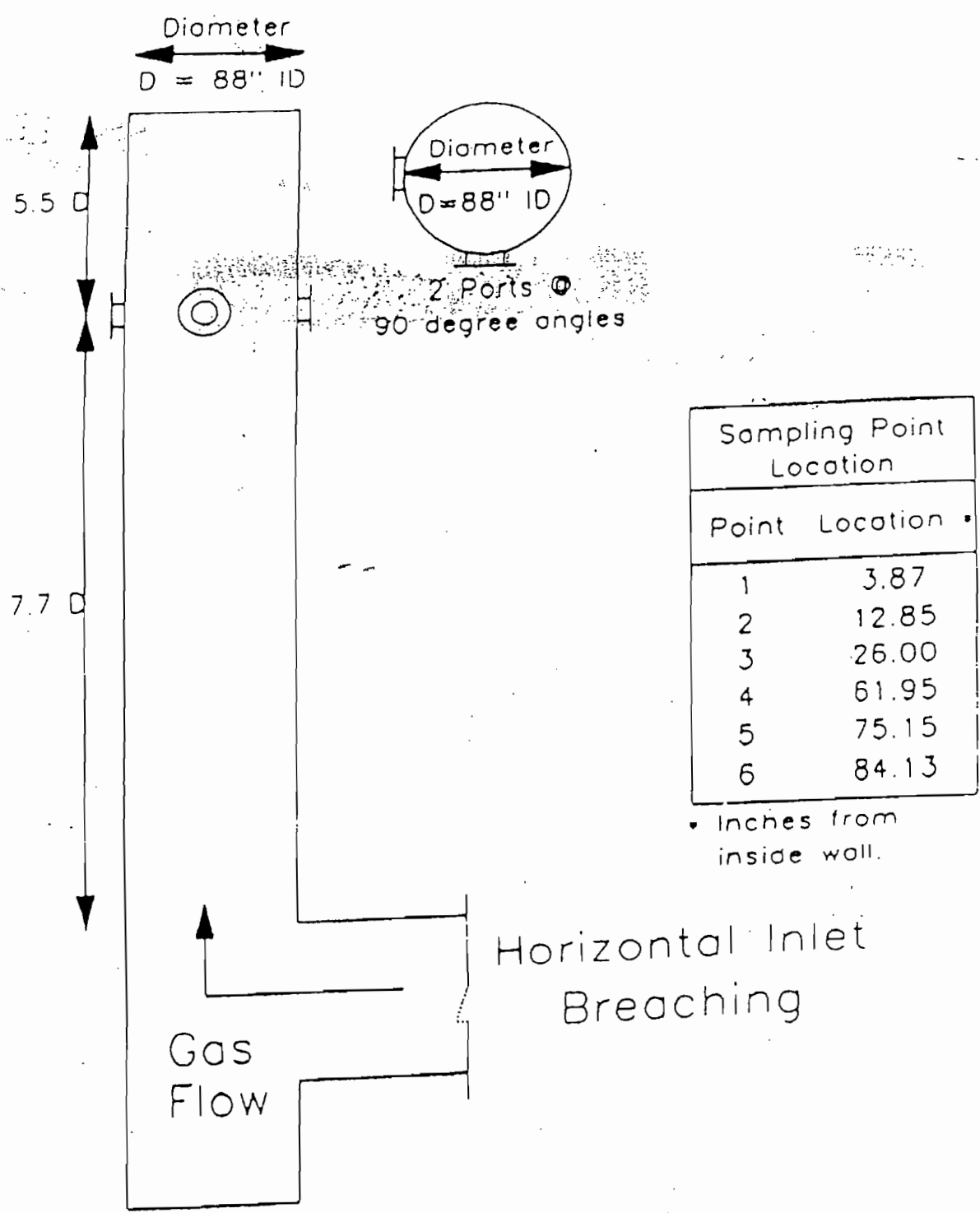


Figure 2-2. Sulfite Recovery Boiler Stack Schematic Diagram

### **3.0 PARTICULATE TEST RESULTS**

### 3.0 PARTICULATE TEST RESULTS

#### 3.1 POWER BOILERS 1, 2 & 3 WITH SCRUBBERS A AND B

Emissions testing for the "A" Scrubber was conducted on June 10, 2004. The tests for "B" Scrubber were conducted on June 9, 2004. The results of the EPA Method 5 particulate matter tests are given in Table 3-1 for the "A" Scrubber stack and in Table 3-2 for the "B" Scrubber stack. The highest observed six-minute average opacity for the two units are also included in the tables.

The average particulate mass emission rate from the "A" Scrubber stack with Power Boiler #1 burning residual fuel oil and Power Boiler #2 burning bark was 43.117 lb/hr during the tests with a range of 30.984 lb/hr to 57.145 lb/hr. The combined emission limit for the two units is 66.6 b/hr (50.6 lb/hr for Unit #2 and 16 lb/hr for Unit #1). The average particulate matter concentration in the gas stream for the "A" stack during the tests was 0.05357 grains per dry standard cubic foot (gr/dscf). The average concentration corrected to 8% oxygen was 0.1787 grams per dry standard cubic meters (grams/dscm).

Particulate matter emissions from the "B" Scrubber stack with Power Boiler #3 burning bark averaged 34.327 lb/hr and varied from 20.900 lb/hr to 47.642 lb/hr. The emission limit for Power Boiler #3 is 50.6 lb/hr. The average particulate matter concentration was 0.04368 gr/dscf. The average concentration corrected to 8% oxygen was 0.1492 grams per dry standard cubic meters (grams/dscm).

### **3.2 SULFITE RECOVERY BOILER**

Emissions testing for the Sulfite Recovery Boiler was conducted on May 24, 2003. The results of the EPA Method 5 particulate matter tests for the Sulfite Recovery Boiler are given in Table 3-3. The highest observed six-minute average opacity for the unit is also included in the table.

Three tests (Runs 1,2, and 3) were run at normal operating conditions for compliance purposes. The average particulate mass emission rate from the recovery boiler during the tests was 21.334 lb/hr with a range of 19.750 lb/hr to 23.102 lb/hr. The average particulate matter concentration in the gas stream for the recovery boiler during the tests was 0.02117 grains per dry standard cubic foot (gr/dscf) at this condition. The average concentration corrected to 8% oxygen was 0.0376 grams per dry standard cubic meters (grams/dscm).

Three additional tests (4, 5, and 6) were run for Rayonier's fixed particulate meter calibration. Results are given in Table 3-4.

The average particulate mass emission rate from the recovery boiler during the additional tests was 26.027 lb/hr with a range of 22.914 lb/hr to 30.195 lb/hr. The average particulate matter concentration in the gas stream for the recovery boiler during the tests was 0.02436 grains per dry standard cubic foot (gr/dscf) at this condition. The average concentration corrected to 8% oxygen was 0.0425 grams per dry standard cubic meters (grams/dscm).

Field data sheets for all sampling are included in Appendix B. Sample calculations and run summaries are given in Appendix A. Calibration and Quality Assurance data are given in Appendix C.

**Table 3-1. Summary of Emissions Testing Data - Total Solid Particulate Matter - Scrubber A**  
**Rayonier**  
**Scrubber A**

Parameter	Units	Run #	1-A	2-A	3-A AVERAGE	
		Date:	10-Jun-04	10-Jun-04	10-Jun-04	
		Start Time:	12:03	14:43	17:37	
		Stop Time:	13:05	15:45	18:39	
<b>Sampling Train &amp; Analytical Parameters:</b>						
Total Solid Particulate Matter:	g		0.0921	0.1208	0.1712	0.1280
Metered Volume:	dscf		36.448	38.908	35.803	37.053
Gas Stream Volumetric Flowrate:	dscfm		92695.6	100362.6	90347.0	94468.4
Oxygen:	%V, dry		11.4	12.3	12.2	12.0
Carbon Dioxide:	%V, dry		7.4	7.5	7.4	7.4
<b>Total Solid Particulate (TSP) Matter Emissions:</b>						
TSP Concentration:	gr/dscf		0.03900	0.04791	0.07379	0.05357
TSP Concentration:	grams/dscm		0.0892	0.1096	0.1688	0.1226
TSP Concentration:	grams/dscm @ 8% O2		0.1212	0.1644	0.2504	0.1787
TSP Mass Emission Rate:	lb/hr		30.984	41.218	57.145	43.116
Visible Emissions - Six Minute Average						20.0

Table 3-2. Summary of Emissions Testing Data - Total Solid Particulate Matter - Scrubber B  
 Rayonier  
 Scrubber B

Parameter	Units	Run #	1-B	2-B	3-B AVERAGE	
		Date:	9-Jun-04	9-Jun-04	9-Jun-04	
		Start Time:	12:30	15:30	17:56	
		Stop Time:	14:00	16:32	18:58	
<b>Sampling Train &amp; Analytical Parameters:</b>						
Total Solid Particulate Matter:	g		0.0682	0.1511	0.1062	0.1085
Metered Volume:	dscf		42.347	37.638	37.053	39.013
Gas Stream Volumetric Flowrate:	dscfm		98106.4	89716.4	90837.6	92886.8
Oxygen:	%V, dry		11.6	12.4	12.4	12.1
Carbon Dioxide:	%V, dry		7.9	7.3	7.5	7.6
<b>Total Solid Particulate (TSP) Matter Emissions:</b>						
TSP Concentration:	gr/dscf		0.02485	0.06195	0.04423	0.04368
TSP Concentration:	grams/dscm		0.0569	0.1418	0.1012	0.0999
TSP Concentration:	grams/dscm @ 8% O2		0.0789	0.2151	0.1536	0.1492
TSP Mass Emission Rate:	lb/hr		20.900	47.642	34.439	34.327
Visible Emissions - Six Minute Average						17.1

Table 3-3. Summary of Compliance Emissions Testing Data - Total Solid Particulate SRB  
 Rayonier  
 SRB

Parameter	Units	Run #	1	2	3 AVERAGE	
		Date:	24-May-04	24-May-04	24-May-04	
		Start Time:	11:14	15:33	17:26	
		Stop Time:	12:28	16:35	18:28	
<b>Sampling Train &amp; Analytical Parameters:</b>						
Total Solid Particulate Matter:	g		0.0719	0.0669	0.0798	0.0729
Metered Volume:	dscf		51.381	53.525	54.401	53.103
Gas Stream Volumetric Flowrate:	dscfm		114266.4	119454.9	119059.2	117593.5
Oxygen:	%V, dry		4.3	4.3	4.3	4.3
Carbon Dioxide:	%V, dry		15.0	14.8	15.0	14.9
<b>Total Solid Particulate (TSP) Matter Emissions:</b>						
TSP Concentration:	gr/dscf		0.02160	0.01929	0.02264	0.02117
TSP Concentration:	grams/dscm		0.0494	0.0441	0.0518	0.0484
TSP Concentration:	grams/dscm @ 8% O2		0.0384	0.0343	0.0403	0.0376
TSP Mass Emission Rate:	lb/hr		21.151	19.750	23.102	21.334
Visible Emissions - Six Minute Average						19.4



**Table 3-4. Summary of Emissions Testing Data for Meter Calibration - Total Solid Pa SRB  
Rayonier  
SRB**

Parameter	Units	Run #	4	5	6	AVERAGE
		Date:	25-May-04	25-May-04	25-May-04	
		Start Time:	9:40	11:18	13:18	
		Stop Time:	10:42	12:20	14:20	
<b>Sampling Train &amp; Analytical Parameters:</b>						
Total Solid Particulate Matter:	g		0.0853	0.0784	0.1013	0.0883
Metered Volume:	dscf		56.046	56.231	55.701	55.993
Gas Stream Volumetric Flowrate:	dscfm		124031.0	124244.8	125518.2	124598.0
Oxygen:	%V, dry		4.2	3.9	3.9	4.0
Carbon Dioxide:	%V, dry		15.3	15.2	15.3	15.3
<b>Total Solid Particulate (TSP) Matter Emissions:</b>						
TSP Concentration:	gr/dscf		0.02349	0.02152	0.02807	0.02436
TSP Mass Emission Rate:	lb/hr		24.97	22.91	30.20	26.03
TSP Mass Emission Rate:	grams/dscm		0.0537	0.0492	0.0642	0.0557
TSP Mass Emission Rate @8% O2:	grams/dscm		0.0415	0.0374	0.0487	0.0425
Visible Emissions - Six Minute Average						19.4

## **4.0 FIELD AND ANALYTICAL PROCEDURES**

## 4.0 FIELD AND ANALYTICAL PROCEDURES

### 4.1 EPA METHOD 5 - PARTICULATE SAMPLING AND ANALYSIS

The sampling and analytical procedures used follow the procedures as outlined in EPA Method 5, in the Code of Federal Regulations, Chapter I, Title 40, Part 60, Appendix A, Method 5, revised as of July 1, 1991. The sampling equipment consisted of the following:

1. Sample Probe Assembly
  - a. Nozzle--Stainless steel with a sharp, tapered leading edge.
  - b. Probe--Stainless steel (S.S.) sheath with a 2-inch diameter glass insert wrapped with nichrome wire; rheostat controlled and capable of maintaining a temperature of 248 +/-25 degrees Fahrenheit (°F).
  - c. Pitot--Type "S" constructed and attached to probe according to specifications outlined in the Code of Federal Regulations, Chapter I, Title 40, Part 60, Appendix A, Method 2.
  - d. Orsat Probe--Stainless steel 1/4 inch tubing attached to pitot tube in an interference-free arrangement.
  - e. Thermocouple--Type "K" attached to the pitot tube such that the tip has no contact with metal and does not interfere with the pitot tube face openings.
2. Filter Holder--Glass with fritted glass filter support.
3. Filter Heating Assembly--Controlled heating element in aluminum module attached to end of probe; capable of maintaining 248 +/-25°F.
4. Impingers--Four impingers connected in series with glass ball/socket joint fittings and placed in an ice bath. A Greenburg-Smith impinger standard

tip configuration is used for the second impinger. The first, third, and fourth impingers are the modified Greenburg-Smith design with a 0.5 in. ID glass tube extending to about 0.5 in. from the bottom of the flask. Final gas exit temperature is measured to within  $\pm 2^{\circ}\text{F}$  with a type "K" thermocouple immersed in the gas stream.

5. Control Box--Model containing vacuum gauge, external leak-free pump, thermocouples capable of measuring temperature to within  $\pm 2^{\circ}\text{F}$ , dry gas meter with a minimum of 2 percent accuracy, valves and related equipment as required to maintain an isokinetic sampling rate, and to determine sample volume.

Prior to leaving the laboratory, glass fiber filters were numbered for identification, heated for 2 hours at 105 degrees C, desiccated for 2 hours, and pre-weighed to the nearest 0.1 mg. Silica gel (indicating type, 6-16 Mesh) was also pre-weighed to 200 grams after oven drying for 24 hours.

Upon arrival at the sampling site, the control box was leak-checked from pump to orifice at 5 to 7 inches of water.

The sample train was prepared in the following manner: 100 mL of  $\text{H}_2\text{O}$  was added to the first and second impingers. The third impinger was left empty, and a pre-weighed quantity of silica gel was added to the fourth impinger for final moisture removal. After assembling the train with the pitot tube as shown in the schematic (Figure 4-1), the system was leak-checked by plugging the inlet to the probe nozzle and pulling a vacuum of at least 15 inches of mercury (Hg). A leakage rate not in excess of 0.02 cfm is

considered acceptable. The pitot tube system was also leak-checked at 2 to 3 inches of water, and any leaks found were corrected.

The inside dimensions of each stack were measured and recorded. The number of sampling points and the location of these points on a traverse were determined by the guidelines set forth in the Code of Federal Regulations, Chapter I, Title 40, Part 60, Appendix A, Method 1. These points were then marked on the probe for easy visibility.

A preliminary traverse was conducted to determine the range of velocity head and the pressure of the stack. An approximate stack temperature was obtained during the same traverse, and an approximate moisture content was estimated based on knowledge of the emission source type and attendant characteristics and prior testing experience. From these data, the correct nozzle size and isokinetic K- factor were determined.

The probe was attached and the heater was adjusted to provide a gas temperature of approximately 250°F. The filter heating system was turned on, and crushed ice was placed around the impingers. After a suitable warm-up period, the nozzle was placed at the first traverse point with the tip pointing directly into the gas stream. The pump was started and the sampling rate was adjusted to isokinetic conditions. After the required time interval had elapsed, the probe was repositioned to the next traverse point, and isokinetic sampling was re-established. This was done for each point on the traverse until the run was completed. Readings were taken at least every 5 minutes or when significant changes in stack conditions necessitated additional adjustments in flow rate. At the conclusion of each run, the pump was turned off and the final readings were recorded. A final leak-check of the system was performed as previously described at the highest vacuum encountered during testing, and a leak-check of the pitot system was repeated.

#### **4.1.1 SAMPLE RECOVERY**

The collection train was carefully moved to a convenient sample recovery area in order to minimize the loss of collected sample or the gain of extraneous particulate matter. The volume of condensate in the first three impingers was measured and recorded on the field data sheet. The probe, nozzle, and all sample-exposed surfaces were rinsed with reagent grade acetone and put into a clean sample bottle marked "pre-filter". A brush was used to loosen any adhering particulate matter, and subsequent rinses were put into the "pre-filter" container. The filter was carefully removed from the fritted glass support and placed in its original container. The silica gel was removed from the fourth impinger and transferred to its original container. A sample of the acetone used in washing the probe was saved for a blank laboratory analysis.

#### **4.1.2 ANALYTICAL PROCEDURES**

The filter and any loose particulate matter were transferred from the sample container to a clean, tared glass weighing dish. The filter was placed in an oven at 105EC for 2 hours, desiccated for 2 hours, and then weighed. The original weight of the filter was deducted, and the weight gain was recorded to the nearest 0.1 mg.

The "pre-filter" and blank solutions were transferred to clean, tared beakers, then evaporated to dryness and desiccated to a constant weight. The blank correction was made, and the weight gain was recorded to the nearest 0.1 mg. The silica gel was weighed, and the weight gain was recorded to the nearest 0.1 gram.

#### **4.2 EPA METHOD 3--ORSAT SAMPLING AND ANALYSIS**

Carbon dioxide (CO<sub>2</sub>) and oxygen (O<sub>2</sub>) samples were collected by an integrated bag system. The Orsat sampling system consisted of a stainless steel probe, sample line from probe to a condenser, a small vacuum pump with a rotameter, and a Tedlar bag.

The Orsat sampling procedure consists of the following leak-check and sampling techniques. Prior to sampling, the bag was leak-checked at 2 to 4 inches of water. The inlet to the condenser was plugged, and a vacuum of 10 inches of Hg was pulled. The outlet of the pump was then plugged and the pump shut off. The vacuum held steady for at least 30 seconds. The sample line was then purged with stack gas and the bag was connected. Sampling was conducted at an appropriate constant rate at the same point or points and for the same length of time as the pollutant sampling. At the conclusion of the run, the pump was shut off and the bag secured.

After leak-checking the Orsat gas analyzer, an average value for each gas was determined. The gas was measured until three values were obtained that fell within the specified variance of the gas tested. Data were recorded on the field data sheet, and the bag was evacuated for the next sample run.

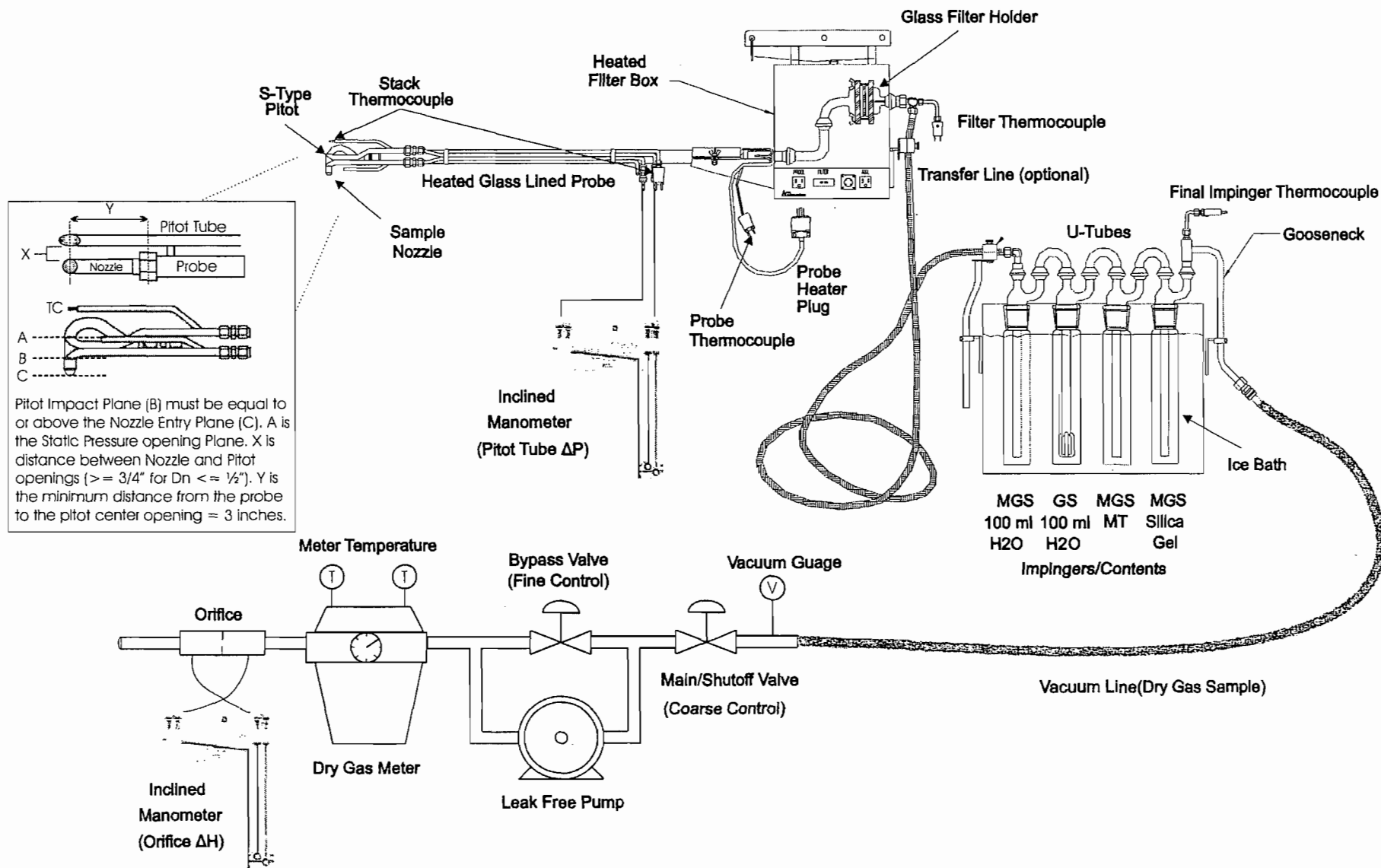


Figure 4-1. Schematic Diagram of EPA Method 5 Sampling Train



## **5.0 QUALITY ASSURANCE/QUALITY CONTROL**

## 5.0 QUALITY ASSURANCE/QUALITY CONTROL

Strict Quality Assurance/Quality Control (QA/QC) measures were observed for all sampling and analysis performed for the Rayonier test program. The STACS QA/QC program is designed to provide the highest quality data in terms of the accuracy and precision of the measurements as well as the representativeness and comparability of the results.

The STACS QA/QC program for this test series includes all of the QA/QC guidelines given in EPA Methods 1-5 (40 CFR Pt 60, Appendix A) in addition to internal QA/QC standards. Primary components of the QA/QC program are listed below:

- Equipment Calibrations - including meter boxes, thermocouples, pitot tubes and analytical balance
- Equipment Leak Checks - including pre- and post-test sample train leak checks, meter and pump leak checks, pitot leak checks and ORSAT system leak checks
- Careful monitoring and documentation of sample train critical parameters including temperatures and meter pressure.
- Preliminary measurements to aid in calculating the sampling K-factor used to determine isokinetic sampling rate.
- Maintaining an isokinetic sampling rate so that the velocity through the sampling nozzle matches the surrounding flue gas stream velocity to within +/- 10%

All sampling train leak rates were less than the maximum acceptable leak rate of 0.02 cubic feet per minute. Sample train leak checks were performed at a vacuum of at least 5" Hg greater than the highest observed vacuum observed during sampling. All sample trains met the +/- 10% criterion for isokinetic sampling. All samples were desiccated and replicate analyses were performed until agreement of 0.5 mg between weighings that were six hours apart.

**APPENDIX A**  
**EMISSION DATA & SAMPLE CALCULATIONS**

**SUMMARY OF EMISSIONS SAMPLING DATA**

Plant:	Rayonier	Location:	Scrubber A	Run #	1-A	2-A	3-A	AVERAGE
Condition:	Normal	Date:	10-Jun-04	10-Jun-04	10-Jun-04			
Unit:	Scrubber A	Method:	Method 5	Start Time:	12:03	14:43	17:37	
Parameter	Units	Stop Time:	13:05	15:45	18:39			
Sampling Time	min.		60	60	60			60
<b>AMBIENT DATA:</b>								
Ambient Temperature	deg. F		90	85	80			85.00
Location Height above Pbar reading	feet		150	150	150			150
Barometric Pressure	in. Hg		29.98	29.98	29.98			29.98
Corrected Barometric Pressure (to location)	in. Hg		29.83	29.83	29.83			29.83
<b>GAS METER DATA:</b>								
Dry Gas Meter Correction Factor (gamma)	Dimensionless		0.9935	0.9935	0.9935			0.9935
Average Meter Differential Pressure	in. H2O		1.2850	1.4425	1.2663			1.3313
Absolute Meter Pressure	in. Hg		29.92	29.94	29.92			29.93
Average Meter Temperature	degrees F		94.0	84.3	83.4			87.2
Metered Dry Sample Gas Volume	dcf		38.487	40.346	37.086			38.640
Average Sampling Rate	dscfm		0.607	0.648	0.597			0.618
Standard Metered Volume	dscf		36.448	38.908	35.803			37.053
Standard Metered Volume	dscm		1.0322	1.1019	1.0140			1.0493
<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	5.6034	5.3021	5.8247				5.5768
Vapor Phase Moisture Content at Saturation:	% Volume	18.79	17.78	19.53				18.70
Total Condensate Collected	grams H2O	210.7	200.9	248.6				220.07
Standard Volume of Water Vapor	scf	9.935	9.472	11.721				10.376
Measured Moisture Content	mole fraction	0.2142	0.1958	0.2466				0.2189
Measured Moisture Content	% Volume	21.42	19.58	24.66				21.89
Gas Stream Vapor Phase Moisture (Bs):	% Volume	18.79	17.78	19.53				18.70
<b>FIXED GAS DATA:</b>								
Oxygen Concentration, Dry Basis	% Volume	11.4	12.3	12.2				12.0
Carbon Dioxide Concentration, Dry Basis	% Volume	7.4	7.5	7.4				7.4
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			#N/A
Nitrogen Concentration, Dry Basis (gas balance)	% Volume	81.2	80.2	80.4				80.6
Gas Molecular Weight, Dry Basis	lb/lb-mole	29.640	29.692	29.672				29.668
Gas Molecular Weight, Wet Basis	lb/lb-mole	27.147	27.403	26.793				27.114
Fo Calculated:	Dimensionless	1.284	1.147	1.176				1.202
Excess Air:	%	113.40	138.38	134.93				128.90
Ultimate CO2	%V,d	16.28	18.23	17.78				17.43
<b>DUCT CONFIGURATION:</b>								
Duct Geometry (C = Circular, R = Rectangular)		C	C	C				
Duct Dimensions (Diameter)	inches	120	120	120				120
Effective Duct Diameter (De)	inches	120	120	120				120
Stack Cross-Sectional Area	ft2	78.54	78.54	78.54				78.54
<b>DUCT GAS CONDITIONS:</b>								
Static Pressure of Gas Stream	in. H2O	-0.170	-0.160	-0.140				-0.157
Absolute Duct Gas Pressure	in. Hg	29.818	29.818	29.820				29.818
Gas Stream Temperature	degrees F	138.13	136.00	139.63				137.92
Gas Stream Wet Bulb Temperature:	degrees F	0	0	0				0
<b>VELOCITY DATA:</b>								
Pilot Tube Coefficient	Dimensionless	0.84	0.84	0.84				0.84
Avg. Square Root of Velocity Head	(in. H2O) <sup>0.5</sup>	0.4609	0.4891	0.4661				0.4720
Gas Stream Velocity	ft/sec	28.454	29.995	28.998				29.149
Gas Stream Velocity	ft/min	1707.26	1799.72	1739.90				1748.96
Gas Stream Velocity	meters/min	520.37	548.56	530.32				533.08
Gas Stream Velocity	mi/hr	19.402	20.453	19.773				19.876
<b>FLOWRATE/ENGLISH UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis	acfm	134087.6	141349.8	136651.6				137363.0
Standard Volumetric Flow Rate, Wet Basis	scfm	117961.5	124796.8	119925.3				120894.5
Standard Volumetric Flow Rate, Dry Basis	dscfm	92695.6	100362.6	90347.0				94468.4
Standard Volumetric Flow Rate, Wet Basis	kscfh	7077.69	7487.81	7195.52				7253.67
Standard Volumetric Flow Rate, Dry Basis	kdscfh	5561.74	6021.76	5420.82				5668.11
Total Mass Flow Rate (wet)	kpph	498.67	532.54	500.37				510.52
<b>FLOWRATE/METRIC UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis	acmm	3797.36	4003.03	3869.97				3890.12
Standard Volumetric Flow Rate, Wet Basis	scmm	3340.67	3534.24	3396.28				3423.73
Standard Volumetric Flow Rate, Dry Basis	dscmm	2625.14	2842.27	2558.63				2675.35
<b>ISOKINETIC SAMPLING DATA:</b>								
Nozzle Diameter:	inches	0.31	0.31	0.31				0.31
Area of Nozzle:	ft^2	5.241E-04	5.241E-04	5.241E-04				5.241E-04
Isokinetic Sampling Rate:	%I	98.3	96.9	99.0				98.1
<b>PARTICULATE MATTER:</b>								
Particulate Matter Collected:	grams	0.0921	0.1208	0.1712				0.1280
Particulate Matter Concentration:	grams/dscm	0.08923	0.10963	0.16884				0.12257
Particulate Matter Mass Emission Rate:	grams/dscf	3.904	5.193	7.200				5.432
Particulate Matter Concentration:	lb/dscf	5.57E-06	6.84E-06	1.05E-05				7.65E-06
Particulate Matter Concentration:	grains/dscf	0.03900	0.04791	0.07379				0.05357
Particulate Matter Mass Emission Rate:	lb/hr	30.984	41.218	57.145				43.116

**SUMMARY OF EMISSIONS SAMPLING DATA**

Plant:	Rayonier	Location:	Scrubber B	Run #	1-B	2-B	3-B	AVERAGE
Condition:	Normal	Date:		9-Jun-04	9-Jun-04	9-Jun-04		
Unit:	Scrubber B	Method:	Method 29	Start Time:	12:30	15:30	17:56	
Parameter		Units		Stop Time:	14:00	16:32	18:58	
Sampling Time		min.		60	60	60		60
<b>AMBIENT DATA:</b>								
Ambient Temperature		deg. F		85	80	78		81.00
Location Height above Pbar reading		feet		150	150	150		150
Barometric Pressure		in. Hg		29.94	29.94	29.94		29.94
Corrected Barometric Pressure (to location)		in. Hg		29.79	29.79	29.79		29.79
<b>GAS METER DATA:</b>								
Dry Gas Meter Correction Factor (gamma)		Dimensionless		1.0095	1.0095	1.0095		1.0095
Average Meter Differential Pressure		in. H <sub>2</sub> O		1.6300	1.3000	1.3325		1.4208
Absolute Meter Pressure		in. Hg		29.91	29.89	29.89		29.89
Average Meter Temperature		degrees F		81.5	79.5	80.0		80.4
Metered Dry Sample Gas Volume		dcf		43.039	38.143	37.579		39.587
Average Sampling Rate		dscfm		0.706	0.627	0.618		0.650
Standard Metered Volume		dscf		42.347	37.638	37.053		39.013
Standard Metered Volume		dscm		1.1993	1.0659	1.0493		1.1048
<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		6.6801	6.3099	6.2898		6.4266
Vapor Phase Moisture Content at Saturation:		% Volume		22.44	21.19	21.12		21.58
Total Condensate Collected		grams H <sub>2</sub> O		319.4	257.6	257.6		278.20
Standard Volume of Water Vapor		scf		15.060	12.146	12.146		13.117
Measured Moisture Content		mole fraction		0.2623	0.2440	0.2469		0.2511
Measured Moisture Content		% Volume		26.23	24.40	24.69		25.11
Gas Stream Vapor Phase Moisture (Bs):		% Volume		22.44	21.19	21.12		21.58
<b>FIXED GAS DATA:</b>								
Oxygen Concentration, Dry Basis		% Volume		11.6	12.4	12.4		12.1
Carbon Dioxide Concentration, Dry Basis		% Volume		7.9	7.3	7.5		7.6
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		80.5	80.3	80.1		80.3
Gas Molecular Weight, Dry Basis		lb/lb-mole		29.728	29.664	29.696		29.696
Gas Molecular Weight, Wet Basis		lb/lb-mole		26.651	26.818	26.809		26.759
Fo Calculated:		Dimensionless		1.177	1.164	1.133		1.158
Excess Air:		%		119.98	140.67	141.51		134.05
Ultimate CO <sub>2</sub>		%V,d		17.75	17.95	18.44		18.05
<b>DUCT CONFIGURATION:</b>								
Duct Geometry (C = Circular, R = Rectangular)				C	C	C		
Duct Dimensions (Diameter)		inches		120	120	120		120
Effective Duct Diameter (De)		inches		120	120	120		120
Stack Cross-Sectional Area		ft <sup>2</sup>		78.54	78.54	78.54		78.54
<b>DUCT GAS CONDITIONS:</b>								
Static Pressure of Gas Stream		in. H <sub>2</sub> O		-0.230	-0.200	-0.170		-0.200
Absolute Duct Gas Pressure		in. Hg		29.773	29.775	29.778		29.775
Gas Stream Temperature		degrees F		145.00	142.75	142.63		143.46
Gas Stream Wet Bulb Temperature:		degrees F		0	0	0		0
<b>VELOCITY DATA:</b>								
Pilot 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>		0.5183	0.4630	0.4704		0.4839
Gas Stream Velocity		ft/sec		32.498	28.887	29.352		30.246
Gas Stream Velocity		ft/min		1949.87	1733.21	1761.14		1814.74
Gas Stream Velocity		meters/min		594.32	528.28	536.79		553.13
Gas Stream Velocity		mi/hr		22.159	19.697	20.014		20.623
<b>FLOWRATE/ENGLISH UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis		acfm		153142.8	136126.2	138319.4		142529.5
Standard Volumetric Flow Rate, Wet Basis		scfm		132995.6	118667.8	120613.6		124092.4
Standard Volumetric Flow Rate, Dry Basis		dscfm		98106.4	89716.4	90837.6		92886.8
Standard Volumetric Flow Rate, Wet Basis		kscfh		7979.74	7120.07	7236.82		7445.54
Standard Volumetric Flow Rate, Dry Basis		kdscfh		5886.39	5382.99	5450.26		5573.21
Total Mass Flow Rate (wet)		kpph		551.96	495.58	503.53		517.02
<b>FLOWRATE/METRIC UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis		acmm		4337.00	3855.09	3917.20		4036.43
Standard Volumetric Flow Rate, Wet Basis		scmm		3766.44	3360.67	3415.78		3514.30
Standard Volumetric Flow Rate, Dry Basis		dscmm		2778.37	2540.77	2572.52		2630.56
<b>ISOKINETIC SAMPLING DATA:</b>								
Nozzle Diameter:		inches		0.31	0.31	0.31		0.31
Area of Nozzle:		ft <sup>2</sup>		5.241E-04	5.241E-04	5.241E-04		5.241E-04
Isokinetic Sampling Rate:		%		107.9	104.8	101.9		104.9
<b>PARTICULATE MATTER:</b>								
Particulate Matter Collected:		grams		0.0682	0.1511	0.1062		0.1085
Particulate Matter Concentration:		grams/dscm		0.05687	0.14176	0.10121		0.09994
Particulate Matter Mass Emission Rate:		grams/sec		2.633	6.003	4.339		4.325
Particulate Matter Concentration:		lb/dscf		3.55E-06	8.85E-06	6.32E-06		6.24E-06
Particulate Matter Concentration:		grains/dscf		0.02485	0.06195	0.04423		0.04368
Particulate Matter Mass Emission Rate:		lb/hr		20.900	47.642	34.439		34.327

**SUMMARY OF EMISSIONS SAMPLING DATA**

Plant:	Rayonier	Location:	SRB	Run #	1	2	3	AVERAGE
Condition:	Normal	Date:		24-May-04	24-May-04	24-May-04		
Unit:	SRB	Method:	Method 5	Start Time:	11:14	15:33	17:26	
Parameter		Units		Stop Time:	12:28	16:35	18:28	
Sampling Time		min.		60	60	60		60
<b>AMBIENT DATA:</b>								
Ambient Temperature		deg. F		80	80	82		80.67
Location Height above Pbar reading		feet		250	250	250		250
Barometric Pressure		in. Hg		30.04	30.04	30.04		30.04
Corrected Barometric Pressure (to location)		in. Hg		29.79	29.79	29.79		29.79
<b>GAS METER DATA:</b>								
Dry Gas Meter Correction Factor (gamma)		Dimensionless		1.0095	1.0095	1.0095		1.0095
Average Meter Differential Pressure		in. H2O		2.5625	2.8200	2.8175		2.7333
Absolute Meter Pressure		in. Hg		29.98	30.00	30.00		29.99
Average Meter Temperature		degrees F		89.3	82.9	80.7		84.3
Metered Dry Sample Gas Volume		dcf		52.851	54.379	55.040		54.090
Average Sampling Rate		dscfm		0.856	0.892	0.907		0.885
Standard Metered Volume		dscf		51.381	53.525	54.401		53.103
Standard Metered Volume		dscm		1.4551	1.5158	1.5406		1.5039
<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		2.2429	2.5213	2.5274		2.4306
Vapor Phase Moisture Content at Saturation:		% Volume		7.53	8.47	8.49		8.16
Total Condensate Collected		grams H2O		103.8	109	115		109.27
Standard Volume of Water Vapor		scf		4.894	5.139	5.422		5.152
Measured Moisture Content		mole fraction		0.0870	0.0876	0.0906		0.0884
Measured Moisture Content		% Volume		8.70	8.76	9.06		8.84
Gas Stream Vapor Phase Moisture (Bs):		% Volume		7.53	8.47	8.49		8.16
<b>FIXED GAS DATA:</b>								
Oxygen Concentration, Dry Basis		% Volume		4.3	4.3	4.3		4.3
Carbon Dioxide Concentration, Dry Basis		% Volume		15.0	14.8	15.0		14.9
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		80.7	80.9	80.7		80.8
Gas Molecular Weight, Dry Basis		lb/lb-mole		30.572	30.540	30.572		30.561
Gas Molecular Weight, Wet Basis		lb/lb-mole		29.479	29.441	29.433		29.451
Fo Calculated:		Dimensionless		1.107	1.122	1.107		1.112
Excess Air:		%		25.26	25.18	25.26		25.24
Ultimate CO2		%V,d		18.89	18.63	18.89		18.80
<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		ft2		42.24	42.24	42.24		42.24
<b>DUCT GAS CONDITIONS:</b>								
Static Pressure of Gas Stream		in. H2O		-0.280	-0.240	-0.240		-0.253
Absolute Duct Gas Pressure		in. Hg		29.769	29.772	29.772		29.771
Gas Stream Temperature		degrees F		105.00	109.00	109.08		107.69
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. H2O)^0.5		0.9218	0.9670	0.9670		0.9519
Gas Stream Velocity		ft/sec		53.112	55.951	55.959		55.007
Gas Stream Velocity		ft/min		3186.73	3357.03	3357.56		3300.44
Gas Stream Velocity		meters/min		971.32	1023.22	1023.38		1005.97
Gas Stream Velocity		mi/hr		36.215	38.150	38.156		37.507
<b>FLOWRATE/ENGLISH UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis		acfm		134598.0	141790.8	141813.1		139400.6
Standard Volumetric Flow Rate, Wet Basis		scfm		125150.5	130924.6	130926.0		129000.4
Standard Volumetric Flow Rate, Dry Basis		dscfm		114266.4	119454.9	119059.2		117593.5
Standard Volumetric Flow Rate, Wet Basis		kscfh		7509.03	7855.48	7855.56		7740.02
Standard Volumetric Flow Rate, Dry Basis		kdscfh		6855.99	7167.29	7143.55		7055.61
Total Mass Flow Rate (wet)		kpph		574.50	600.25	600.07		591.61
<b>FLOWRATE/METRIC UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis		acmm		3811.81	4015.52	4016.15		3947.83
Standard Volumetric Flow Rate, Wet Basis		scmm		3544.26	3707.78	3707.83		3653.29
Standard Volumetric Flow Rate, Dry Basis		dscmm		3236.02	3382.96	3371.76		3330.25
<b>ISOKINETIC SAMPLING DATA:</b>								
Nozzle Diameter:		inches		0.252	0.252	0.252		0.252
Area of Nozzle:		ft^2		3.464E-04	3.464E-04	3.464E-04		3.464E-04
Isokinetic Sampling Rate:		%I		91.4	91.1	92.9		91.8
<b>PARTICULATE MATTER:</b>								
Particulate Matter Collected:		grams		0.0719	0.0669	0.0798		0.0729
Particulate Matter Concentration:		grams/dscm		0.04941	0.04413	0.05180		0.04845
Particulate Matter Mass Emission Rate:		grams/sec		2.665	2.488	2.911		2.688
Particulate Matter Concentration:		lb/dscf		3.09E-06	2.76E-06	3.23E-06		3.02E-06
Particulate Matter Concentration:		grains/dscf		0.02160	0.01929	0.02264		0.02117
Particulate Matter Mass Emission Rate:		lb/hr		21.151	19.750	23.102		21.334

**SUMMARY OF EMISSIONS SAMPLING DATA**

Plant:	Rayonier	Location:	SRB	Run #	4	5	6	AVERAGE
Condition:	Bypass Open	Method:	Method 5	Date:	25-May-04	25-May-04	25-May-04	
Unit:	SRB	Units		Start Time:	9:40	11:18	13:21	
Parameter		Units		Stop Time:	10:42	12:20	14:24	
Sampling Time		min.			60	60	60	60
<b>AMBIENT DATA:</b>								
Ambient Temperature		deg. F		75	75	85	78.33	
Location Height above Pbar reading		feet		250	250	250	250	
Barometric Pressure		in. Hg		29.92	29.92	29.92	29.92	
Corrected Barometric Pressure (to location)		in. Hg		29.67	29.67	29.67	29.67	
<b>GAS METER DATA:</b>								
Dry Gas Meter Correction Factor (gamma)		Dimensionless		1.0095	1.0095	1.0095	1.0095	
Average Meter Differential Pressure		in. H2O		3.0575	3.0875	3.1625	3.1025	
Absolute Meter Pressure		in. Hg		29.89	29.90	29.90	29.90	
Average Meter Temperature		degrees F		82.9	91.5	88.9	87.8	
Metered Dry Sample Gas Volume		dcf		57.135	58.226	57.396	57.586	
Average Sampling Rate		dscfm		0.934	0.937	0.928	0.933	
Standard Metered Volume		dscf		56.046	56.231	55.701	55.993	
Standard Metered Volume		dscm		1.5872	1.5925	1.5774	1.5857	
<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		2.3670	2.5092	2.6205	2.4989	
Vapor Phase Moisture Content at Saturation:		% Volume		7.99	8.47	8.84	8.43	
Total Condensate Collected		grams H2O		116.4	120.4	121	119.27	
Standard Volume of Water Vapor		scf		5.488	5.677	5.705	5.623	
Measured Moisture Content		mole fraction		0.0892	0.0917	0.0929	0.0913	
Measured Moisture Content		% Volume		8.92	9.17	9.29	9.13	
Gas Stream Vapor Phase Moisture (Bs):		% Volume		7.99	8.47	8.84	8.43	
<b>FIXED GAS DATA:</b>								
Oxygen Concentration, Dry Basis		% Volume		4.2	3.9	3.9	4.0	
Carbon Dioxide Concentration, Dry Basis		% Volume		15.3	15.2	15.3	15.3	
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		80.5	80.9	80.8	80.7	
Gas Molecular Weight, Dry Basis		lb/lb-mole		30.616	30.588	30.604	30.603	
Gas Molecular Weight, Wet Basis		lb/lb-mole		29.491	29.434	29.433	29.452	
Fo Calculated:		Dimensionless		1.092	1.118	1.111	1.107	
Excess Air:		%		24.61	22.32	22.35	23.09	
Ultimate CO2		%V_d		19.15	18.69	18.81	18.88	
<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		ft2		42.24	42.24	42.24	42.24	
<b>DUCT GAS CONDITIONS:</b>								
Static Pressure of Gas Stream		in. H2O		-0.500	-0.480	-0.470	-0.483	
Absolute Duct Gas Pressure		in. Hg		29.633	29.635	29.635	29.634	
Gas Stream Temperature		degrees F		106.83	108.83	110.33	108.67	
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. H2O) <sup>0.5</sup>		1.0071	1.0124	1.0255	1.0150	
Gas Stream Velocity		ft/sec		58.246	58.711	59.547	58.834	
Gas Stream Velocity		ft/min		3494.73	3522.63	3572.79	3530.05	
Gas Stream Velocity		meters/min		1065.19	1073.70	1088.99	1075.96	
Gas Stream Velocity		mi/hr		39.715	40.032	40.602	40.117	
<b>FLOWRATE/ENGLISH UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis		acfm		147606.9	148785.3	150904.0	149098.7	
Standard Volumetric Flow Rate, Wet Basis		scfm		136176.7	136788.0	138374.4	137113.0	
Standard Volumetric Flow Rate, Dry Basis		dscfm		124031.0	124244.8	125518.2	124598.0	
Standard Volumetric Flow Rate, Wet Basis		kscfh		8170.60	8207.28	8302.46	8226.78	
Standard Volumetric Flow Rate, Dry Basis		kdschf		7441.86	7454.69	7531.09	7475.88	
Total Mass Flow Rate (wet)		kpph		625.38	626.97	634.22	628.86	
<b>FLOWRATE/METRIC UNITS</b>								
Actual Volumetric Flow Rate, Wet Basis		acmm		4180.23	4213.60	4273.60	4222.48	
Standard Volumetric Flow Rate, Wet Basis		scmm		3856.52	3873.83	3918.76	3883.04	
Standard Volumetric Flow Rate, Dry Basis		dscmm		3512.56	3518.61	3554.68	3528.61	
<b>ISOKINETIC SAMPLING DATA:</b>								
Nozzle Diameter:		inches		0.252	0.252	0.252	0.252	
Area of Nozzle:		ft <sup>2</sup>		3.464E-04	3.464E-04	3.464E-04	3.464E-04	
Isokinetic Sampling Rate:		%I		91.9	92.0	90.2	91.4	
<b>PARTICULATE MATTER:</b>								
Particulate Matter Collected:		grams		0.0853	0.0784	0.1013	0.0883	
Particulate Matter Concentration:		grams/dscm		0.05374	0.04923	0.06422	0.05573	
Particulate Matter Mass Emission Rate:		grams/sec		3.146	2.887	3.805	3.279	
Particulate Matter Concentration:		lb/dscf		3.36E-06	3.07E-06	4.01E-06	3.48E-06	
Particulate Matter Concentration:		grains/dscf		0.02349	0.02152	0.02807	0.02436	
Particulate Matter Mass Emission Rate:		lb/hr		24.970	22.914	30.195	26.027	



Rayonier	Scrubber A	Normal	Unit:	Scrubber A
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VELOCITY AND VOLUMETRIC FLOWRATE DETERMINATION  
EPA METHOD 2 CALCULATIONS

Parameter	Definition	Units
Cp	- Pitot Tube Coefficient	Dimensionless
Vs	- Gas Stream Velocity	ft/sec
Qsd	- Volumetric Flow Rate at Standard Conditions, Dry Basis	dscfm
Qact	- Actual Volumetric Flow Rate, Wet Basis	acfm
Bws	- Moisture Content	mole fraction
Dp	- Avg. Sq. Root of Velocity Head	(in. H2O) <sup>0.5</sup>
Pb	- Absolute Barometric Pressure	in. Hg
Kp	- Constant = 89.49 (ft)(lb/lb-mol)(in.Hg <sup>0.5</sup> )/(s)( <sub>R</sub> )(in.H2O)	
Ts	- Absolute Gas Stream Temperature	degrees R
Ms	- Sample Gas Molecular Weight, Wet Basis	lb/lb-mole
Sp	- Static Pressure of Gas Stream	in. H2O
528	- Absolute Standard Temperature	degrees R
CSA	- Stack Cross-Sectional Area	ft <sup>2</sup>
Ps	- Absolute Stack Gas Pressure	in. Hg
60	- Conversion Factor	sec/min.
Pi	- Constant Ratio ~ 3.1416	Dimensionless
D	- Duct Diameter	inches

TEST DATA RUN # 1-A

Ms =	27.464	Cp =	0.84
Bws =	0.1870	Pb =	29.98
Sp =	-0.17	Ts =	598.1
D =	120.00	Dp =	0.4609

Circular Duct

$$Ps = Pb + (Sp/13.6) = 29.98 + (-0.17/13.6) = 29.97 \text{ in.Hg}$$

$$Vs = (85.49)(Cp)(Dp) \left[ \frac{(Ts)}{(Ms \cdot Ps)} \right]^{0.5}$$

$$= 85.49 \cdot 0.84 \cdot 0.4609 \cdot [598.1 / (27.464 \cdot 29.97)]^{0.5}$$

$$= 28.219 \text{ ft/s} \qquad 28.219 \text{ ft/s}$$

$$CSA = (Pi) \left[ \frac{(D)^2}{(4)(144)} \right] = 3.1416 \cdot \frac{(120.00)^2}{(4)(144)} = 78.540 \text{ ft}^2 \qquad 78.540$$

$$Qact = (Vs) \cdot CSA \cdot 60 = 28.219 \cdot 78.540 \cdot 60 = 132978.3 \text{ acfm}$$

$$Qsd = \frac{(Qact)(1 - Bws)(528)(Ps)}{(Ts)(29.92)} = \frac{132,978.3 \cdot (1 - 0.1870) \cdot 528 \cdot 29.97}{598.1 \cdot 29.92}$$

$$= 95589.77 \text{ dscfm} \qquad 95589.77 \text{ dscfm}$$

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Rayonier	Scrubber A	Normal	Unit:	Scrubber A
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MOLECULAR WEIGHT DETERMINATION  
EPA METHOD 3 CALCULATIONS

Parameter	Definition	Units
Md	- Sample Gas Molecular Weight, Dry Basis	lb/lb-mole
Ms	- Sample Gas Molecular Weight, Wet Basis	lb/lb-mole
Bws	- Moisture Content	mole fraction
%CO2	- Carbon Dioxide Concentration, Dry Basis	% Volume
%CO	- Carbon Monoxide Concentration, Dry Basis	% Volume
%O2	- Oxygen Concentration, Dry Basis	% Volume
%N2	- Nitrogen Concentration, Dry Basis (gas balance)	% Volume
0.32	- Molecular Weight of Oxygen (O2), divided by 100%	lb/lb-mole
0.28	- Molecular Weight of Carbon Monoxide, divided by 100%	lb/lb-mole
0.28	- Molecular Weight of Nitrogen (N2), divided by 100%	lb/lb-mole
0.44	- Molecular Weight of Carbon Dioxide, divided by 100%	lb/lb-mole
18.0	- Molecular Weight of Water	lb/lb-mole

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TEST DATA RUN # 1-A

Bws =	0.1870	%CO =	0.00
%N2 =	81.20	%CO2 =	7.40
%O2 =	11.40		

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$$\begin{aligned} \text{Md} &= (0.44)(\%CO_2) + (0.32)(\%O_2) + (0.28)(\%N_2 + \%CO) \\ &= (0.44)*7.40 + (0.32)*11.40 + (0.28)*(81.20 + 0.00) \\ &= 29.640 \text{ lb/lb-mol} \end{aligned}$$

$$\begin{aligned} \text{Ms} &= (\text{Md})(1 - \text{Bws}) + (18.0)(\text{Bws}) \\ &= 29.640*(1 - 0.1870) + 18.0*0.1870 \\ &= 27.464 \text{ lb/lb-mol} \end{aligned}$$

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Rayonier                      Scrubber A                      Normal                      Unit:                      Scrubber A

MOISTURE CONTENT DETERMINATION  
EPA METHOD 4 CALCULATIONS

Parameter	Definition	Units
Pm	- Absolute Meter Pressure	in. Hg
Po	- Average Meter Differential Pressure	in. H2O
Ps	- Absolute Stack Gas Pressure	in. Hg
Pstd	- Absolute Standard Barometric Pressure (29.92)	in. Hg
Pb	- Absolute Barometric Pressure	in. Hg
K	- Standard Volume H2O Vapor/Unit Weight Liquid Constant = 0.04715 cu.ft/g	ft3/g
Tm	- Average Meter Temperature	degrees R
Tstd	- Absolute Standard Temperature (528_R)	degrees R
DGMC	- Dry Gas Meter Correction Factor (gamma)	Dimensionless
Vlcg	- Total Condensate Collected	grams H2O
Vm	- Metered Dry Sample Gas Volume	dcf
Vmstd	- Metered Volume at Standard Conditions(528_R, 1atm)	dscf
Vwstd	- Volume of Water Vapor Collected, at Standard Conditions (528_R, 1atm)	scf
W(sat)	- Vapor Pressure of H2O at Stack Temperature	in. Hg
Bws	- Moisture Content	mole fraction
Bwd	- Moisture Content	% Volume

TEST DATA RUN # 1-A

Pb =	29.98	Tm =	554
Vm =	38.487	Po =	1.285
Vlcg =	210.7	DGMC =	0.9935
W(sat) =	5.603402	Ps =	29.9675

MEASURED MOISTURE CALCULATIONS

Pm	=	Pb + (Po/13.6)	=	29.98 + (1.29/13.6)	=	30.074 in. Hg
Vmstd	=	$\frac{(Vm)(DGMC)(Pm)(Tstd)}{(Pstd)(Tm)}$	=	$\frac{38.487 \cdot 0.9935 \cdot 30.07 \cdot 528}{29.92 \cdot 554.0}$	=	36.448 ft3
Vwstd	=	(K)(Vlcg)	=	(0.04715)(210.7)	=	9.935 ft3
Bws	=	$\frac{Vwstd}{(Vwstd)+(Vmstd)}$	=	$\frac{9.935}{(9.935+36.448)}$	=	0.2142 mol frac
Bwd	=	(Bws)*100 %	=	0.2142*100%	=	21.42% V

SATURATED MOISTURE CALCULATIONS

B(sat)	=	W(sat)/Ps	=	5.60/29.97	=	0.186983 mol frac
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VAPOR PHASE MOISTURE

Bws	=	0.186983	Lower of Measured or Saturated Moisture
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Bwd	=	(Bws)*100 %	=	18.70%
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Rayonier	Scrubber A	Normal	Unit:	Scrubber A
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ISOKINETIC SAMPLING RATE  
EPA METHOD 5 CALCULATIONS

Parameter	Definition	Units
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K4	- Constant = 0.09450	
Ts	- Average Stack Temperature	degrees R
Vmstd	- Metered Volume at Standard Conditions(528_R, 1atm)	dscf
Ps	- Absolute Stack Gas Pressure	in. Hg
Vs	- Gas Stream Velocity	ft/sec
Bws	- Moisture Content	mole fraction
t	- Sampling Time Duration	minutes
Dn	- Sample Nozzle Diameter	inches
An	- Area of Nozzle	ft <sup>2</sup>
%I	- Percent of Isokinetic Sampling	%

TEST DATA RUN # 1-A

Ts =	598.125	Vs =	28.21887
Vmstd =	36.44779	Bws =	0.186983
Ps =	29.9675	Dn =	0.31
t =	60		

An	=	$(\pi)[(Dn)^2]/[(4)(144)]$	
	=	$3.1416*(0.310^2)/[(4)(144)]$	
	=	5.24E-04 ft <sup>2</sup>	5.24E-04 ft <sup>2</sup>

%I	=	$\frac{K4(Ts)(Vmstd)}{(Ps)(Vs)(An)(t)(1-Bws)}$	
	=	$\frac{0.09450*598.1*36.448}{29.97*28.22*0.0005241*60.0(1 - 0.187)}$	
	=	95.28 % Isokinetic	95.28028 %

Rayonier                      Scrubber A                      Normal                      Unit:                      Scrubber A

PARTICULATE MATTER EMISSIONS  
EPA METHOD 5 CALCULATIONS

Parameter	Definition	Units
Mn	- Total Mass of Particulate Matter Collected	grams
Vmstd	- Metered Volume at Standard Conditions(528_R, 1atm)	dscf
Qsd	- Volumetric Flow Rate at Standard Conditions, Dry Basis	dscfm
Cs	- Concentration of Particulate Matter in Gas	gr/dscf
ER	- Particulate Matter Emission Rate	lb/hr
15.43	- Conversion Factor (grains/gram)	gr/g
7000	- Conversion Factor (grains/lb)	gr/lb
60	- Conversion Factor (minutes/hour)	min/hr

TEST DATA RUN # 1-A

Mn =            0.0921  
Vmstd =       36.44779  
Qsd =           95589.77

$$Cs = \frac{(Mn) \cdot 15.43}{(Vmstd)} = \frac{0.09210 \cdot 15.43}{36.448} = 0.03900 \text{ gr/dscf}$$

$$ER = (Cs)(Qsd)(60)/7000 = 0.0390 \cdot 95,589.8 \cdot 60 / 7000$$

$$= 30.98386 \text{ lb/hr} \qquad \qquad \qquad 30.98386 \text{ lb/hr}$$

Fd	- Dry F Factor (gas volume to heat input ratio)	dscf/MMBtu
%O2	- Oxygen Concentration, Dry Basis	% Volume
E	- Particulate Matter Emission Rate	lb/MMBtu

$$E = \frac{(Cs)(Fd)(20.9)}{(7000)(20.9 - \%O_2)} = \frac{\#N/A}{7000 \cdot (20.9 - 11.4)} = \#N/A \text{ lb/MMBtu}$$

**APPENDIX B**  
**FIELD DATA SHEETS**

STACS ISOKINETIC SAMPLING FIELD DATA SHEET

Facility:	Rayonier			Meter #:	AS			Baro. Press:	2998		Page #:	1
Unit:	scrubber A			DH@:	1.781			Ambient Temp:	90		Pitot LC:	✓
Location:				DGM Factor:	.9935			Nozzle Dia:	.310			
Test Type:	MS			Pitot #:	18			Static P:	-.17			
Run #:	LA			Pitot Coef:	.84			Stack Dimensions:	120			
Condition:								Stack Height:	~150			
Operator(s):	JBP / FLG			K-Factor:	6			Init. Leak Check:	0.003 cfm @ 15 "Hg			
Date:	6-10-04			Filter#:	495			Final Leak Check:	0.001 cfm @ 10 "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)		
	1203	75.883										
A 1	1205.5	77.6	.25	1.5	137	261	244	67	90	90	2	
2	1208	79.3	.21	1.3	136	260	246	65	92	92	2	
3	1210.5	80.9	.22	1.3	137	260	244	64	92	92	2	
4	1213	82.5	.2	1.2	138	256	245	63	93	93	2	
5	1215.5	84.0	.24	1.5	138	257	245	62	93	93	2	
6	1218	85.6	.22	1.3	140	256	244	62	93	93	2	
7	1220.5	87.3	.25	1.5	139	256	244	63	93	93	2	
8	1223	89.0	.22	1.3	139	257	243	63	94	94	2	
9	1225.5	90.5	.19	1.1	140	255	243	63	94	94	2	
10	1228	92.0	.19	1.1	140	254	245	63	94	94	2	
11	1230.5	93.3	.15	.9	128	252	241	63	94	94	2	
12	1233	94.687	.14	.84	132	252	244	64	94	94	2	
STOP	1235	94.705	LC	0.002	@ 12'45"							
B 1	1237.5	96.1	.16	1.0	137	251	244	66	95	95	2	
2	1240	97.4	.16	1.0	138	252	245	64	95	95	2	
3	1242.5	99.1	.23	1.4	141	252	251	64	95	95	2	
4	1245	100.8	.23	1.4	140	253	252	64	95	95	2	
5	1247.5	102.4	.22	1.3	140	245	248	63	95	95	2	
6	1250	104.1	.25	1.5	140	252	246	63	95	95	2	
7	1252.5	105.9	.28	1.6	140	252	246	63	95	95	2	
8	1255	107.7	.27	1.6	141	254	256	63	95	95	2	
9	1257.5	109.5	.24	1.5	139	259	252	64	95	95	2	
10	1300	111.3	.25	1.5	139	258	253	64	95	95	2	
11	1302.5	112.9	.19	1.1	138	258	258	64	95	95	2	
12	1305	114.388	.18	1.1	138	255	256	65	95	95	2	
		38.487				138.1				94		
				1.285								
			.4609									
		36.6158										
							6.65	.2132				
									Q = 93.581			
									978 %T			
Avg/Tot.												
Impinger	1	2	3	4	5	Total Traverse Point %'s						
Final	290	112		212.4	6 Point (4.4) (14.6) (29.6) (70.4) (85.4) (95.6)							
Initial	100	100		203.7	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				210.7	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												
CO2												





STACS ISOKINETIC SAMPLING FIELD DATA SHEET

Facility:	<i>Rayonics</i>	Meter #:	<i>A-5</i>	Baro. Press:	<i>29.88</i>	Page #:	<i>1</i>
Unit:	<i>scrubber A</i>	DH@:	<i>1.781</i>	Ambient Temp:	<i>80</i>	Pitot LC:	<input checked="" type="checkbox"/>
Location:		DGM Factor:	<i>0.9935</i>	Nozzle Dia:	<i>.310</i>		
Test Type:	<i>M5</i>	Pitot #:		Static P:	<i>-0.14</i>		
Run #:	<i>3-A</i>	Pitot Coef:	<i>.84</i>	Stack Dimensions:	<i>120"</i>		
Condition:				Stack Height:	<i>~150'</i>		
Operator(s):	<i>JBP/SC</i>	K-Factor:	<i>5.8</i>	Init. Leak Check:	<i>0.000 cfm @ 11</i>	"Hg	
Date:	<i>6-10-04</i>	Filter#:		Final Leak Check:	<i>0.000 cfm @ 6</i>	"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	1737	56.607	.21	1.2	189	256	252	64	83		2
2	1742	59.321	.21	1.2	140	257	251	60	83		2
3	1745	60.8	.22	1.3	141	256	248	58	83		2
4	1747	62.37	.22	1.3	141	255	249	58	83		2
5	1749	63.9	.25	1.5	142	253	250	58	84		3
6	1752	68.6	.24	1.4	142	251	250	58	84		3
7	1754	67.1	.27	1.6	141	250	253	59	84		3
8	1757	69.1	.24	1.5	142	248	253	59	84		4
9	1759	71.3	.2	1.2	141	254	254	59	84		3
10	1802	72.7	.19	1.1	140	256	255	59	84		3
11	1804	73.7	.17	.99	139	255	255	60	84		3
12	1807	74.6	.16	.93	138	251	253	60	84		3
std	1809	74.672		1.0	138	251	253	60	84		3
B 1	1811	76.8	.18	1.0	139	253	253	63	84		3
2	1814	78.6	.19	1.1	140	256	247	60	84		3
3	1816	80.4	.21	1.2	141	256	249	61	83		3
4	1819	82.2	.22	1.3	141	257	256	61	83		4
5	1821	83.6	.27	1.6	140	256	253	61	83		4
6	1824	84.7	.26	1.5	138	255	254	61	83		4
7	1826	86.2	.24	1.4	139	256	255	62	83		4
8	1829	87.4	.23	1.3	137	253	255	61	83		4
9	1831	88.8	.23	1.3	138	254	254	62	83		4
10	1834	90.2	.20	1.3	137	257	257	62	83		3
11	1836	91.7	.21	1.2	137	258	256	62	83		3
12	1839	93.019	.18	1.0	136	255	256	62	83		3

Nozzle Calibration:

Avg/Tot.					⊙	⊖	⊗			
Impinger	1	2	3	4	5	Total Traverse Point %'s				
Final	292	143			2064	6 Point (4.4)(14.6)(29.6)(70.4)(85.4)(95.6)				
Initial	100	100			19828	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					218.6	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										
CO2	7.4									





STACS ISOKINETIC SAMPLING FIELD DATA SHEET

Facility:	<u>ANOUER</u>	Meter #:	<u>A7</u>	Baro. Press:	<u>29.94</u>	Page #:	<u>1</u>
Unit:		DH@:	<u>1.785</u>	Ambient Temp:	<u>78</u>	Pitot LC:	<u>✓</u>
Location:	<u>scrubber B</u>	DGM Factor:	<u>1.0095</u>	Nozzle Dia:	<u>.310</u>		
Test Type:	<u>M29</u>	Pitot #:	<u>18</u>	Static P:	<u>-.17</u>		
Run #:	<u>3</u>	Pitot Coef:	<u>.84</u>	Stack Dimensions:	<u>120"</u>		
Condition:				Stack Height:	<u>~150'</u>		
Operator(s):	<u>JBP</u>	K-Factor:	<u>6</u>	Init. Leak Check:	<u>0.002 cfm @ 15" Hg</u>		
Date:	<u>6-9-04</u>	Filter#:		Final Leak Check:	<u>0 cfm @ 10" Hg</u>		

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)	
A1	1756	873.8	.20	1.2	144	249	251	64	78	78	3
2	1758.5	89.0	.20	1.2	143	250	252	63	79	79	3
3	1801	90.6	.21	1.2	143	251	257	57	79	79	3
4	1803.5	92.1	.21	1.2	143	251	257	57	79	79	3
5	1806	93.6	.24	1.4	145	252	259	58	79	79	3
6	1808.5	95.2	.24	1.4	144	252	256	58	79	79	3
7	1811	96.9	.26	1.5	144	248	256	59	79	79	3
8	1813.5	98.5	.25	1.5	142	249	257	60	79	79	3
9	1816	100.0	.24	1.4	142	247	258	60	80	80	3
10	1818.5	101.6	.26	1.5	142	248	253	61	80	80	3
11	1821	103.4	.24	1.4	141	248	251	61	80	80	3
12	1823.5	105.0	.23	1.4	141	249	256	61	80	80	4
13	1826	106.526	.23	1.4	141	250	255	62	80	80	4
STOP	1828	106.541	LC	0.004	@ 15" Hg						
B1	1828.5	108.0	.18	1.1	141	249	257	65	80	80	3
2	1833	109.8	.19	1.1	143	249	250	62	80	80	3
3	1835.5	111.3	.21	1.2	142	249	253	62	80	80	3
4	1838	112.8	.23	1.3	145	251	257	63	81	81	3
5	1840.5	114.4	.26	1.5	144	250	258	63	80	80	5
6	1843	116.2	.25	1.4	143	254	260	64	81	81	5
7	1845.5	117.7	.21	1.2	144	253	251	64	81	81	5
8	1848	119.2	.22	1.3	141	252	256	64	81	81	5
9	1850.5	120.7	.21	1.2	142	251	255	64	81	81	5
10	1853	122.1	.21	1.2	142	253	254	64	81	81	4
11	1855.5	123.5	.18	1.1	142	251	254	64	81	81	4
12	1856	124.922	.17	1.1	142	252	255	65	81	81	4
80											
1.3 142.6											
37.579											
,4704											
37.2214											
RWSE = .2458											
101.7 % O <sub>2</sub>											
Q = 91,458											

Avg/Tot.										
Impinger	1	2	3	4	5 Total	Traverse Point %'s				
Final						6 Point (4.4) (14.8) (29.6) (70.4) (85.4) (95.6)				
Initial						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										
ORSAT/CEM	1	2	3	4	5	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.				
O2	12.8									
CO2	7.5									

STACS ISOKINETIC SAMPLING FIELD DATA SHEET

Facility:	<i>Rayonier</i>	Meter #:	<i>A7</i>	Baro. Press:	<i>30.04</i>	Page #:	<i>1</i>
Unit:	<i>SRB</i>	DH @	<i>1.785</i>	Ambient Temp:	<i>80</i>	Pitot LC:	<input checked="" type="checkbox"/>
Location:	<i>Fernandina</i>	DGM Factor:	<i>1.0685</i>	Nozzle Dia:	<i>.252</i>		
Test Type:	<i>MS</i>	Pitot #:	<i>P18</i>	Static P:	<i>-.28</i>		
Run #:	<i>1</i>	Pitot Coef:	<i>.87</i>	Stack Dimensions:	<i>88</i>		
Condition:		Wet Bulb		Stack Height:	<i>~ 250</i>		
Operator(s):	<i>JBP</i>	K	<i>3.0</i>	Init. Leak Check:	<i>0.004 Lpm @ 15</i>	"Hg	
Date:	<i>5-24-04</i>			Final Leak Check:	<i>0.602 Lpm @ 15</i>	"Hg	

Traverse Point Number	Time	Gas Meter Reading Vm(L3)	Flow Rate AP ("LPM)	Meter Press. ("H2O)	Stack Temp (F)	Probe Temp (F)	Impinger Temp (F)	Dry Gas Meter Temp.		Vacuum ("Hg)	Filter Temp
								Inlet (F)	Outlet (F)		
<i>AL6</i>	<i>1114</i>	<i>48.487</i>									
<i>5</i>	<i>1119</i>	<i>53.2</i>	<i>0.9</i>	<i>2.7</i>	<i>105</i>	<i>261</i>	<i>57</i>	<i>85</i>	<i>85</i>	<i>4</i>	<i>259</i>
<i>4</i>	<i>1124</i>	<i>57.6</i>	<i>0.95</i>	<i>2.8</i>	<i>105</i>	<i>252</i>	<i>57</i>	<i>86</i>	<i>86</i>	<i>5</i>	<i>263</i>
<i>3</i>	<i>1129</i>	<i>62.2</i>	<i>.91</i>	<i>.27</i>	<i>105</i>	<i>256</i>	<i>58</i>	<i>86</i>	<i>86</i>	<i>6</i>	<i>258</i>
<i>2</i>	<i>1134</i>	<i>68.5</i>	<i>.88</i>	<i>2.65</i>	<i>105</i>	<i>261</i>	<i>59</i>	<i>88</i>	<i>88</i>	<i>7</i>	<i>257</i>
<i>1</i>	<i>1139</i>	<i>71.2</i>	<i>.81</i>	<i>2.4</i>	<i>105</i>	<i>245</i>	<i>60</i>	<i>88</i>	<i>88</i>	<i>6</i>	<i>258</i>
<i>1</i>	<i>1144</i>	<i>74.753</i>	<i>.55</i>	<i>1.65</i>	<i>105</i>	<i>246</i>	<i>61</i>	<i>90</i>	<i>90</i>	<i>4</i>	<i>262</i>
<i>std</i>	<i>1158</i>	<i>75.688</i>		<i>k-c 0.001 @ 1145</i>							
<i>B6</i>	<i>1203</i>	<i>80.3</i>	<i>.95</i>	<i>2.8</i>	<i>105</i>	<i>261</i>	<i>65</i>	<i>90</i>	<i>90</i>	<i>5</i>	<i>261</i>
<i>5</i>	<i>1208</i>	<i>85.0</i>	<i>.93</i>	<i>2.8</i>	<i>105</i>	<i>260</i>	<i>62</i>	<i>90</i>	<i>90</i>	<i>5</i>	<i>261</i>
<i>4</i>	<i>1213</i>	<i>89.3</i>	<i>.96</i>	<i>2.4</i>	<i>105</i>	<i>257</i>	<i>57</i>	<i>91</i>	<i>91</i>	<i>5</i>	<i>260</i>
<i>3</i>	<i>1218</i>	<i>93.7</i>	<i>.92</i>	<i>2.8</i>	<i>105</i>	<i>258</i>	<i>58</i>	<i>92</i>	<i>92</i>	<i>5</i>	<i>260</i>
<i>2</i>	<i>1223</i>	<i>98.3</i>	<i>.77</i>	<i>2.3</i>	<i>105</i>	<i>258</i>	<i>58</i>	<i>93</i>	<i>93</i>	<i>4</i>	<i>260</i>
<i>1</i>	<i>1228</i>	<i>102.283</i>	<i>.72</i>	<i>2.2</i>	<i>105</i>	<i>258</i>	<i>59</i>	<i>93</i>	<i>93</i>	<i>4</i>	<i>261</i>

$89.3$   
 $52.851$   
 $.9218$   
 $(2.633)$   
 $26.585$   
 $(25.9482)$   
 $51.7916$  std.

$Q = 108342$   
 $Buss = .0862$

Avg/Tot.																	
Impinger	1	2	3	4	Total	Traverse Point %'s											
Final	<i>180</i>	<i>116</i>		<i>198.5</i>	6 Point	(4.4)	(14.6)	(29.6)	(70.4)	(85.4)	(95.6)						
Initial	<i>100</i>	<i>100</i>		<i>190.7</i>	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	<i>80</i>	<i>16</i>		<i>7.8</i>	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	<i>103.8</i>												
O2	<i>4.5</i>																
CO2	<i>15.0</i>																

*3.9*  
*12.8*  
*26*  
*62*  
*75.2*  
*84.1*

34

STACS ISOKINETIC SAMPLING FIELD DATA SHEET

Facility:	Rayanier	Meter #:	A 7	Baro. Press:	30.04	Page #:	1
Unit:	SRB	DGM Factor:	1.0095	Ambient Temp:	80	Pitot LC:	✓
Location:	stack	Nozzle Dia:	1.785	Static P:	.252		
Test Type:	MS	Pitot #:	P18	Stack Dimensions:	88"		
Run #:	2	Pitot Coef:	.89	Stack Height:	~ 250		
Condition:		Wet Bulb		Init. Leak Check:	0.001 Lpm@ 15 "Hg		
Operator(s):	JBP	Filter #:	471	Final Leak Check:	0.002 Lpm@ 11 "Hg		
Date:	5/24/04						

Traverse Point Number	Time	Gas Meter Reading Vm(L3)	Flow Rate ΔP (#LPM)	Meter Press. ("H2O)	Stack Temp (F)	Probe Temp (F)	Impinger Temp (F)	Dry Gas Meter Temp.		Vacuum ("Hg)	Filter Box
								Inlet (F)	Outlet (F)		
	1533	0.3725									
AG	1538	8.3	.98	2.9	109	254	64	82	82	5	256
5	1543	12.8	1.0	3.0	109	258	63	82	82	5	257
4	1548	17.3	1.1	3.3	109	248	62	82	82	5	260
3	1553	22.1	1.0	3.0	109	253	62	83	83	5	258
2	1558	27.0	.93	2.8	109	258	62	83	83	5	258
1	1603	30.817	.70	2.1	109	258	62	83	83	4	251
STOP	1605	30.836									
B6	1610	35.8	1.05	3.15	109	256	61	83	83	5	255
5	1615	40.3	1.0	3.0	109	248	60	83	83	5	249
4	1620	45.6	1.05	3.15	109	248	60	83	83	6	251
3	1625	49.8	.95	2.9	109	256	61	83	83	6	247
2	1630	54.7	.85	2.6	109	247	62	84	84	6	251
1	1635	58.123	.67	2.0	109	244	63	84	84	6	250
								829			
		54.379	.9670	2.825	109						
		53.9522	std								
					Bws =	.0869					
					Q =	130,000					
					91.4 % I						

Avg/Tot.											
Impinger	1	2	3	4	Total	Traverse Point %'s					
Final	188	108	—	209.3	6 Point	(4.4) (14.6) (29.6) (70.4) (85.4) (95.6)					
Initial	100	100	0	196.3	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				13	Note: Nearest upstream disturbance or exit must be 2 duct diameters						
ORSAT/CEM	1	2	3	4	away and nearest downstream disturbance must be at least 8 diameters						
O2	4.5				away to use 6 points per traverse.						
CO2	14.8										



**STACS ISOKINETIC SAMPLING FIELD DATA SHEET**

Facility: <u>ROWNER</u>	Meter #: <u>A7</u>	Baro. Press: <u>29.92</u>	Page #: <u>1</u>
Unit: <u>SRB</u>	A/HO: <u>1.785</u>	Ambient Temp: <u>75</u>	Pitot LC: <u>✓</u>
Location: <u>RECOVERY</u>	DGM Factor: <u>1.0075</u>	Nozzle Dia: <u>.252</u>	
Test Type: <u>MS</u>	Pitot #: <u>P18</u>	Static P: <u>-.5</u>	
Run #: <u>4</u>	Pitot Coef: <u>.84</u>	Stack Dimensions: <u>88"</u>	
Condition:	Wet Bulb	Stack Height: <u>-250'</u>	
Operator(s): <u>JBP</u>	<u>K</u>	3.0	Init. Leak Check: <u>0.002 Lpm @ 15" Hg</u>
Date: <u>5/25/04</u>			Final Leak Check: <u>0.000 Lpm @ 17" Hg</u>

Traverse Point Number	Time	Gas Meter Reading (mm <sup>3</sup> )	Flow Rate ("LPM)	Meter Press. ("H2O)	Stack Temp (F)	Probe Temp (F)	Impinger Temp (F)	Dry Gas Meter Temp.		Vacuum ("Hg)	Filter Temp
								Inlet (F)	Outlet (F)		
1-1	0945	836.010	3.0	3.0	107	259	60	78	87	2.0	265
2	0950	840.210	1.1	3.3	106	262	59	80	88	2.0	267
3	0955	845.171	1.1	3.3	106	256	58	81	84	3.0	270
4	1000	850.200	1.2	3.6	107	257	57	81	84	3.0	276
5	1005	854.610	.90	2.85	107	259	56	79	83	7.0	274
6	1010	858.803	.75	2.25	107	261	56	78	84	6.5	275
START- 1012		858.824		✓	✓	0 @ 10"	✓	0 @ 10"	10"		
2-1	1017	862.910	.80	2.40	107	260	56	79	85	6.0	275
2	1022	867.715	.98	2.94	107	261	55	80	85	6.0	275
3	1027	872.631	1.1	3.3	107	258	55	80	86	7.0	277
4	1032	877.800	1.2	3.6	107	261	57	81	86	8.0	277
5	1037	882.811	1.1	3.3	107	259	56	83	87	8.5	277
6	1042	887.557	1.0	3.0	107	259	57	84	87	8.0	281

82.9

56.955      297.8      106.8

1.0071

56.3048

$Q = 124619$

91.9 % ↓

Avg/Tot.	100	100																	
Impinger	180ml	113ml	2	0	3	208.24	Total	Traverse Point %'s											
Final						184.8	6 Point	(4.4)	(14.6)	(29.6)	(70.4)	(85.4)	(95.6)						
Initial							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						116.4	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	4.2																		
CO2	15.3																		







# Rayonier Fernandina

Source Testing and Consulting Services Inc. A = Acetone Wash  
Gravimetric Analysis Data Sheet F = Filter

Date				6/13/04	6/14/04	6/15/04			
Time				0930	1000	1030			
Beaker/ Filter#	Sample ID	Volume	Tare (g)	Final Weights(g)				Final wt.	Net wt.
				1st wt.	2nd wt.	3rd wt.	4th wt.		
10	SRB-1-A	15.5	60.9089	.9159	.9152	.9153		60.9153	.0064
466	SRB-1-F		.4251	.4906	.4906			.4906	.0655
47	SRB-2-A	140	60.3987	.4087	.4088			60.4088	.0101
471	SRB-2-F		.4291	.4860	.4859			.4859	.0568
5-4	SRB-3-A	160	61.4103	.4242	.4235	.4236		61.4236	.0133
465	SRB-3-F		.4219	.4885	.4884			.4884	.0665
13	SRB-4-A	140	61.3624	.3834	.3832			61.3832	.0208
470	SRB-4-F		.4214	.4861	.4859			.4859	.0645
18	SRB-5-A	170	61.4706	.4828	.4825			61.4825	.0119
469	SRB-5-F		.4223	.4887	.4888			.4888	.0665
88	SRB-6-A	145	61.5981	.6519	.6511	.6512		61.6512	.0531
474	SRB-6-F		.4214	.4696	.4696			.4696	.0482
25	B-1-A	165	62.9898	63.0132	61.0132			61.0132	.0234
496	B-1-F		.4213	.4661	.4661			.4661	.0448
27	B-2-A	150	57.7919	.9297	.9285	.9287		57.9287	.1368
497	B-2-F		.4236	.4379	.4379			.4379	.0143
78	B-3-A	160	61.7351	62.0093	62.0093			62.0093	.0744
493	B-3-F		.4242	.4560	.4560			.4560	.0318
68	A-1-A	180	64.2871	.3486	.3486			64.3486	.0615
495	A-1-F		.4210	.4515	.4516			.4516	.0306
38	A-2-A	175	61.216	.2110	.2112			61.2112	.0896
472	A-2-F		.4289	.4611	.4600	.4601		.4601	.0312
48	A-3-A	150	61.4303	.5806	.5808			61.5808	.1505
473	A-3-F		.4264	.4471	.4471			.4471	.0207
477	F-BIK		.4199	.4199	.4199			.4199	—
68	A-BIK	185	68.4481	68.4480	68.4480			68.4480	—

Calibration					
0.1g wt.		.1000	.1000	.1000	
0.5g wt.		.5001	.5000	.5000	
1g wt.		1.0000	1.0000	1.0000	
50g wt.		49.9999	50.0001	50.0000	
100g wt.		100.0000	100.0000	99.9999	

Visible Emission Observation Form

SOURCE NAME <b>Rayonier</b>			OBSERVATION DATE <b>6-10-04</b>				START TIME <b>1200</b>		STOP TIME <b>1300</b>					
ADDRESS <b>End of Gum STREET</b>			SEC	0	15	30	45	SEC	0	15	30	45		
CITY <b>Fernandina Beach</b>			STATE <b>FLA</b>		ZIP <b>32034</b>		MIN	1	10	10	15	15		
PHONE			SOURCE ID NUMBER				MIN	2	15	15	10	15		
PROCESS EQUIPMENT <b>BARIC Boiler "A"</b>			OPERATING MODE				MIN	3	15	10	10	10		
CONTROL EQUIPMENT <b>WET Scrubbers</b>			OPERATING MODE <b>NORMAL</b>				MIN	4	10	15	15	15		
DESCRIBE EMISSION POINT <b>START Rank white Mat STOP SAME</b>							MIN	5	15	15	15	10		
HEIGHT ABOVE GROUND LEVEL <b>START 160' STOP 160'</b>			HEIGHT RELATIVE TO OBSERVER <b>START 160' STOP 160'</b>				MIN	6	10	10	10	15		
DISTANCE FROM OBSERVER <b>START 1000 yd STOP 1000 yd</b>			DIRECTION FROM OBSERVER <b>START WEST STOP WEST</b>				MIN	7	15	15	15	15		
DESCRIBE EMISSIONS <b>START STEAM plume STOP SAME</b>							MIN	8	10	10	10	10		
EMISSION COLOR <b>START white STOP white</b>			PLUME TYPE: CONTINUOUS <input checked="" type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>				MIN	9	10	10	10	15		
WATER DROPLETS PRESENT: <b>NO <input type="checkbox"/> YES <input checked="" type="checkbox"/></b>			IF WATER DROPLET PLUME ATTACHED <input checked="" type="checkbox"/> DETACHED <input type="checkbox"/>				MIN	10	15	15	15	10		
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED <b>START 200 yds End of plume STOP SAME</b>							MIN	11	10	15	15	10		
DESCRIBE BACKGROUND <b>START Sky STOP Sky</b>							MIN	12	15	15	10	10		
BACKGROUND COLOR <b>START Blue STOP Blue</b>			SKY CONDITIONS <b>START Scattered STOP SAME</b>				MIN	13	10	10	10	10		
WIND SPEED <b>START 3-5 STOP 3-5</b>			WIND DIRECTION <b>START N.W STOP N.W</b>				MIN	14	15	15	15	20		
AMBIENT TEMP. <b>START 91 STOP 91</b>			WET BULB TEMP. <b>82</b>		RH. percent <b>69</b>		MIN	15	20	15	15	15		
Source Layout Sketch			Draw North Arrow				MIN	16	15	20	20	15		
							MIN	17	15	15	20	20		
							MIN	18	15	15	15	15	15	
							MIN	19	20	20	20	15	15	
							MIN	20	15	15	15	15	15	
							MIN	21	20	20	20	15	15	
							MIN	22	15	15	10	10	10	
							MIN	23	10	10	10	10	10	
							MIN	24	15	15	15	10	5	5
							MIN	25	10	10	15	15	10	10
							MIN	26	10	10	10	10	15	15
				MIN	27	10	15	15	10	15	10			
				MIN	28	10	10	10	10	5	5			
				MIN	29	10	10	10	10	15	10			
				MIN	30	5	5	5	10	10	10			
AVERAGE OPACITY FOR HIGHEST PERIOD			17.08				NUMBER OF READINGS ABOVE 17.08 % WERE 13							
RANGE OF OPACITY READINGS			MINIMUM 5				MAXIMUM 20							
OBSERVER'S NAME (PRINT)			Sid CARTER											
COMMENTS <b>V.E. Taken during Rain</b>			OBSERVER'S SIGNATURE <i>Sid Carter</i>				DATE <b>6-10-04</b>							
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY <i>E.T.A</i>				DATE <b>2-04</b>							
TITLE			DATE				VERIFIED BY							
							DATE							

Source Name <b>RAYONIER</b> Type of Source		Observation Date <b>6-19-04</b> Start Time <b>1230</b> End Time <b>1330</b>											
Address <b>End of Gum STREET</b>		Sec	0	15	30	45	Comments	Sec	0	15	30	45	Comments
City <b>FERNADINA BEACH</b> State <b>FL</b> Zip	1	10	10	15	15			31	15	15	15	10	
Phone	Source ID Number	2	15	15	10	25		32	20	10	10	15	
Process Equip <b>BARK Boilers</b>	Operating Mode	3	20	20	15	10		33	20	20	20	15	
Control Equip <b>M20 Scrubber</b>	Operating Mode <b>NORMAL</b>	4	10	10	15	15		34	10	10	10	15	
Describe Emission Point <b>Round white METAL Stack</b>	5	15	15	15	10			35	15	15	15	15	
Height above ground level <b>160'</b>	Height relative to Observer <b>160'</b>	6	10	15	15	10		36	15	20	20	20	
Distance from observer <b>1000 yds</b>	Direction from Observer <b>Start WEST End WEST</b>	7	20	20	20	15		37	20	20	20	15	
Describe Emissions & Color <b>Looping SAME</b>	Start <b>White STEAM</b> End <b>SAME</b>	8	20	15	15	10		38	15	15	20	20	
Visible Water Vapor? If yes, distance above stack for reading <b>300'</b>	9	10	10	10	15			39	20	25	25	20	
Point in Plume at Which Opacity was Determined <b>End of Plume ~ 300 yds</b>	10	15	15	20	15			40	15	15	10	10	
Describe Plume Background <b>SKY</b>	Background Color <b>White/Blue</b>	11	15	15	15	15		41	10	10	10	10	
Start <b>SKY</b>	Start <b>White/Blue</b>	12	10	10	15	10		42	10	15	15	15	
End <b>SKY</b>	End <b>SAME</b>	13	15	15	15	20		43	10	10	15	10	
Sky Conditions: Start <b>OVERCAST</b>	14	20	20	15	15			44	10	15	15	10	
End <b>SAME</b>	Wind Speed <b>5.7</b>	Wind Direction From <b>SE</b> End <b>SE</b>	15	15	20	20	10	45	10	10	10	10	
Ambient Temperature <b>83</b>	Wet Bulb Temp <b>78</b>	RH Percent <b>79%</b>	16	10	10	15	15	46	15	15	15	15	
Notes: 1-Stack or Point being read 2-Wind Direction From 3-Observer Location 4-Sun Location 5-Other Stacks		17	15	15	20	20		47	15	15	10	10	
		18	20	20	15	15		48	10	10	10	10	
		19	15	15	10	10		49	10	15	15	15	
		20	15	15	10	10		50	15	20	20	20	
		21	20	20	20	15		51	25	15	15	10	
		22	15	15	10	15		52	10	10	10	15	
		23	15	15	20	20		53	10	10	10	10	
		24	25	25	20	20		54	10	15	15	20	
		25	20	20	25	25		55	20	15	15	15	
		26	20	20	15	15		56	10	10	15	15	
		27	20	20	20	20		57	15	15	20	20	
		28	20	20	20	20		58	20	15	15	10	
		29	10	10	10	15		59	10	10	10	15	
		30	15	15	10	10		60	15	15	15	10	
30	15	15	15	10		60	15	15	15	10			

Range of Opacity  
Minimum **10** Maximum **25**

I have received a copy of these opacity observations

Print Name: \_\_\_\_\_

Print Observer's Name **Sid CARTER**

Signature: \_\_\_\_\_ Date: **6-19-04**

Organization **S.T.A.C.S**

Certified By: **S.T.A** Date: **3-04**

20%

Visible Emission Observation Form

SOURCE NAME		OBSERVATION DATE				START TIME		STOP TIME			
RAYONIER		5-24-04				11:15 AM		12:15			
ADDRESS		SEC		MIN		SEC		MIN		SEC	
Foot of Gum STREET		0	15	30	45	0	15	30	45		
P.O. Box 2002		1	15	15	10	31	15	15	15	20	
CITY	STATE	ZIP									
FERNANDINA BEACH	FLA	32035									
PHONE	SOURCE ID NUMBER										
904-277-1480											
PROCESS EQUIPMENT		OPERATING MODE									
RECOVERY Boiler		378 K/MR									
CONTROL EQUIPMENT		OPERATING MODE									
Brinks Scrubber		NORMA									
DESCRIBE EMISSION POINT											
STACK (SOUTHERN MOST)											
START Round METAL STOP											
HEIGHT ABOVE GROUND LEVEL		HEIGHT RELATIVE TO OBSERVER									
START 300' STOP 300'		START 300' STOP 300'									
DISTANCE FROM OBSERVER		DIRECTION FROM OBSERVER									
START 906' STOP 900'		START WEST STOP WEST									
DESCRIBE EMISSIONS											
START Looping STOP Looping											
EMISSION COLOR		PLUME TYPE: CONTINUOUS <input checked="" type="checkbox"/>									
START white STOP white		FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>									
WATER DROPLETS PRESENT		IF WATER DROPLET PLUME									
NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>		ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>									
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED											
START 300 yds down STOP Emission point											
DESCRIBE BACKGROUND											
START SKY STOP SKY											
BACKGROUND COLOR		SKY CONDITIONS									
START Blue STOP Blue		START CLEAR STOP CLEAR									
WIND SPEED		WIND DIRECTION									
START 5-10 STOP 5-10		START S.E. STOP S.E.									
AMBIENT TEMP		WET BULB TEMP		RH. percent							
START 87 STOP 87		77		65							
Source Layout Sketch		Draw North Arrow									
Emission Point											
Sun -> Wind -> Plume and Stack											
Observers Position											
Sup. Observation Line											
AVERAGE OPACITY FOR HIGHEST PERIOD		18.96		NUMBER OF READINGS ABOVE		18.96 % WERE 70					
RANGE OF OPACITY READINGS		MINIMUM 10		MAXIMUM 25							
OBSERVER'S NAME (PRINT)		Sid Carter									
COMMENTS		OBSERVER'S SIGNATURE		DATE							
V.E. taken during 1st Run #5		Sid Carter		5-24-04							
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE		CERTIFIED BY		DATE							
		E.T.A.		2-04							
TITLE		DATE		VERIFIED BY		DATE					

19.4%

**APPENDIX C**  
**CALIBRATION DATA**

BEST AVAILABLE COPY

# VISIBLE EMISSIONS EVALUATOR

This is to certify that

*Sidney J. Carter*

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

*314903*

*Orlando, Florida*

*February 11, 2004*

Certificate Number

Location

Date of Issue

*Thomas Lore*

*Michael W. Sanford*

President

Director of Training



**Source Testing And Consulting Services**

**Meter Box Calibration**

Calibration Date: 1/19/2004	Orifice ID	Y Calibration	Delta H @ Cal.	Vac
Meter Box: A-7	63	pass	pass	pass
Technician: JBP	40	pass	pass	pass
	48	pass	pass	pass
	55	pass	pass	pass
	73	pass	pass	pass

PART 1: Orifice Calibration												
Calibration Orifice Set:										Critical Vacuum: 13.9		
Barometric Pressure (in. Hg): 29.200												
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
63	1	1.90	74.344	101.568	74.00	75.00	70.00	70.00	35	0	0.5971	21
63	2	1.90	101.568	107.772	75.00	75.00	70.00	70.00	8	0	0.5971	20
40	1	0.31	38.170	41.730	73.00	72.00	70.00	70.00	11	15	0.2403	25
40	2	0.31	43.720	61.172	71.00	71.00	70.00	70.00	56	0	0.2403	25
48	1	0.65	26.414	32.073	72.00	73.00	70.00	70.00	12	30	0.3511	22
48	2	0.65	32.073	38.170	73.00	73.00	70.00	70.00	13	30	0.3511	22
55	1	1.10	7.772	19.245	73.00	72.00	70.00	69.00	19	0	0.4636	20
55	2	1.10	19.245	26.414	72.00	72.00	70.00	69.00	12	0	0.4636	20
73	1	3.50	55.183	67.405	74.00	75.00	70.00	70.00	11	30	0.8261	15
73	2	3.50	67.405	74.344	75.00	75.00	70.00	70.00	6	30	0.8261	15
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 @				
63	1	27.224	26.36080	26.50697	74.5	70	1.0055	1.8136				
63	2	6.204	6.00167	6.05874	75	70	1.0095	1.8119				
	AVE						1.0075	1.8127				
40	1	3.56	3.44628	3.42887	72.5	70	0.9949	1.8193				
40	2	17.452	16.94225	17.06816	71	70	1.0074	1.8244				
	AVE						1.0012	1.8218				
48	1	5.659	5.48292	5.56655	72.5	70	1.0153	1.7899				
48	2	6.097	5.90175	6.01187	73	70	1.0187	1.7882				
	AVE						1.0170	1.7891				
55	1	11.473	11.12859	11.17756	72.5	69.5	1.0044	1.7396				
55	2	7.169	6.96033	7.05951	72	69.5	1.0142	1.7413				
	AVE						1.0093	1.7405				
73	1	12.222	11.88193	12.04968	74.5	70	1.0141	1.7594				
73	2	6.939	6.73962	6.81069	75	70	1.0105	1.7577				
	AVE						1.0123	1.7585				
Average for All Runs								1.0095	1.7845			

**PART 2: Thermocouple Calibration**

T/C Calibrator Make: Extech

T/C Calibrator Model: Oyster

Hg Thermometer Reading (F):

Calibrator Output (F)	Meter Reading (F)	Error (F)	Allowable Error (F)	Result
0.0	0	0	9.24	pass
32.0	32	0	9.88	pass
70.0	69	-1	10.64	pass
100.0	99	-1	11.24	pass
200.0	200	0	13.24	pass
500.0	499	-1	19.24	pass
1200.0	1198	-2	33.24	pass
1995.0	1993	-2	49.24	pass

**Source Testing And Consulting Services  
Meter Box Calibration**

Calibration Date: 3/6/2004	Orifice ID	Y Calibration	Delta H @ Cal.	Vac
Meter Box: A-5	63	pass	pass	pass
Technician: JBP	40	pass	pass	pass
	48	pass	pass	pass
	55	pass	pass	pass
	73	pass	pass	pass

PART 1: Orifice Calibration											
Calibration Orifice Set:								Critical Vacuum: 13.9			
Barometric Pressure (in. Hg): 29.200											
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
63	1	1.90	48.815	55.986	83.00	83.00	76.00	77.00	9   0	0.5971	18
63	2	1.90	55.986	74.263	83.00	82.00	76.00	76.00	23   0	0.5971	18
40	1	0.28	40.932	45.680	75.00	76.00	74.00	74.00	15   0	0.2403	25
40	2	0.28	45.680	50.427	76.00	77.00	74.00	74.00	15   0	0.2403	25
48	1	0.65	16.680	30.062	72.00	74.00	71.00	72.00	29   0	0.3511	24
48	2	0.65	30.062	40.932	74.00	75.00	72.00	74.00	23   30	0.3511	24
55	1	1.20	74.263	109.866	82.00	81.00	76.00	77.00	58   0	0.4636	21
55	2	1.20	9.866	16.643	81.00	71.00	77.00	76.00	11   0	0.4636	21
73	1	3.50	51.314	137.872	67.00	82.00	69.00	75.00	79   30	0.8261	17
73	2	3.50	37.872	48.815	82.00	83.00	75.00	76.00	10   0	0.8261	17
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 @			
63	1	7.171	6.83493	6.77466	83	76.5	0.9912	1.8071			
63	2	18.277	17.43651	17.32110	82.5	76	0.9934	1.8071			
AVE							0.9923	1.8071			
40	1	4.748	4.57024	4.55467	75.5	74	0.9966	1.6461			
40	2	4.747	4.56076	4.55467	76.5	74	0.9987	1.6430			
AVE							0.9976	1.6445			
48	1	13.382	12.95345	12.89615	73	71.5	0.9956	1.7933			
48	2	10.87	10.49237	10.43561	74.5	73	0.9946	1.7933			
AVE							0.9951	1.7933			
55	1	35.603	33.96878	33.89764	81.5	76.5	0.9979	1.8919			
55	2	6.777	6.53228	6.42886	76	76.5	0.9842	1.9113			
AVE							0.9910	1.9016			
73	1	86.558	84.14955	83.14321	74.5	72	0.9880	1.7660			
73	2	10.943	10.48163	10.42403	82.5	75.5	0.9945	1.7514			
AVE							0.9913	1.7587			
Average for All Runs								0.9935	1.7810		

**PART 2: Thermocouple Calibration**

T/C Calibrator Make: Extech T/C Calibrator Model: Oyster  
Hg Thermometer Reading (F): \_\_\_\_\_

Calibrator Output (F)	Meter Reading (F)	Error (F)	Allowable Error (F)	Result
0.0	0	0	9.24	pass
32.0	31	-1	9.88	pass
70.0	68	-2	10.64	pass
100.0	98	-2	11.24	pass
200.0	200	0	13.24	pass
500.0	498	-2	19.24	pass
1200.0	1199	-1	33.24	pass
1995.0	1998	3	49.24	pass

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

<b>Plant:</b>	Rayonier	<b>Location:</b>	Scrubber A	<b>Run #</b>	1-A	2-A	3-A AVERAGE	
<b>Condition:</b>	Normal	<b>Meter #:</b>	A-5	<b>Date:</b>	6/10/04	6/10/04	6/10/04	
<b>Unit:</b>	Scrubber A	<b>Method:</b>	Method 5	<b>Start Time:</b>	12:03	14:43	17:37	
<b>Parameter</b>				<b>Stop Time:</b>	13:05	15:45	18:39	
<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		1.285	1.4425	1.27	<b>1.33</b>
Absolute Meter Pressure			in. Hg		29.92	29.94	29.92	<b>29.93</b>
Average Meter Temperature			degrees F		94	84.25	83.42	<b>87.22</b>
Metered Dry Sample Gas Volume			dcf		38.487	40.346	37.086	<b>38.64</b>
Gas Molecular Weight, Dry Basis			lb/lb-mole		29.64	29.69	29.67	<b>29.67</b>
<b>Pre Test Calibration Factors</b>								
DeltaH@			in. H2O		1.781	1.781	1.781	<b>1.781</b>
Dry Gas Meter Correction Factor (gamma)			Dimensionless		0.9935	0.9935	0.9935	<b>0.9935</b>
<b>Post Test Data</b>								
Calculated Meter Correction Factor (Yqa)			Dimensionless		<b>1.0066</b>	<b>1.0073</b>	<b>1.0265</b>	<b>1.0135</b>
Difference (Post Test and Pretest Y - Maximum Allowed 5%)			%		<b>1.32%</b>	<b>1.39%</b>	<b>3.32%</b>	<b>2.01%</b>

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

<b>Plant:</b>	Rayonier	<b>Location:</b>	Scrubber B	<b>Run #</b>	1-B	2-B	3-B AVERAGE	
<b>Condition:</b>	Normal	<b>Meter #:</b>	A-7	<b>Date:</b>	6/9/04	6/9/04	6/9/04	
<b>Unit:</b>	Scrubber B	<b>Method:</b>	Method 29	<b>Start Time:</b>	12:30	15:30	17:56	
<b>Parameter</b>		<b>Units</b>		<b>Stop Time:</b>	14:00	16:32	18:58	
<b>Sampling Time</b>		<b>min.</b>			60.00	60.00	60.00	
<b>GAS METER DATA:</b>								
Average Meter Differential Pressure		in. H2O			1.63	1.3	1.3325	1.42
Absolute Meter Pressure		in. Hg			29.91	29.89	29.89	29.89
Average Meter Temperature		degrees F			81.54	79.54	80	80.36
Metered Dry Sample Gas Volume		dcf			43.039	38.143	37.579	39.59
Gas Molecular Weight, Dry Basis		lb/lb-mole			29.73	29.66	29.70	29.70
<b>Pre Test Calibration Factors</b>								
DeltaH@		in. H2O			1.785	1.785	1.785	1.785
Dry Gas Meter Correction Factor (gamma)		Dimensionless			1.0095	1.0095	1.0095	1.0095
<b>Post Test Data</b>								
Calculated Meter Correction Factor (Yqa)		Dimensionless			1.0000	1.0073	1.0349	1.0141
Difference (Post Test and Pretest Y - Maximum Allowed 5%)		%			-0.94%	-0.22%	2.52%	0.45%

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

<b>Plant:</b>	Rayonier	<b>Location:</b>	SRB	<b>Run #</b>	1	2	3	<b>AVERAGE</b>
<b>Condition:</b>	Normal	<b>Meter #:</b>	A-7	<b>Date:</b>	5/24/04	5/24/04	5/24/04	
<b>Unit:</b>	SRB	<b>Method:</b>	Method 5	<b>Start Time:</b>	11:14	15:33	17:26	
<b>Parameter</b>				<b>Stop Time:</b>	12:28	16:35	18:28	
<b>Sampling Time</b>			<b>Units</b>		60.00	60.00	60.00	<b>60.0</b>
			min.					
<b>GAS METER DATA:</b>								
Average Meter Differential Pressure			in. H2O		2.5625	2.82	2.8175	<b>2.73</b>
Absolute Meter Pressure			in. Hg		29.98	30.00	30.00	<b>29.99</b>
Average Meter Temperature			degrees F		89.3333333	82.9166667	80.6666667	<b>84.31</b>
Metered Dry Sample Gas Volume			dcf		52.851	54.379	55.04	<b>54.09</b>
Gas Molecular Weight, Dry Basis			lb/lb-mole		30.57	30.54	30.57	<b>30.56</b>
<b>Pre Test Calibration Factors</b>								
DeltaH@			in. H2O		1.785	1.785	1.785	<b>1.785</b>
Dry Gas Meter Correction Factor (gamma)			Dimensionless		1.0095	1.0095	1.0095	<b>1.0095</b>
<b>Post Test Data</b>								
Calculated Meter Correction Factor (Yqa)			Dimensionless		1.0129	1.0269	1.0114	<b>1.0171</b>
Difference (Post Test and Pretest Y - Maximum Allowed 5%)			%		<b>0.33%</b>	<b>1.72%</b>	<b>0.19%</b>	<b>0.75%</b>

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

<b>Plant:</b>	Rayonier	<b>Location:</b>	SRB	<b>Run #</b>	4	5	6	AVERAGE
<b>Condition:</b>	Bypass Open	<b>Meter #:</b>	A-7	<b>Date:</b>	5/25/04	5/25/04	5/25/04	
<b>Unit:</b>	SRB	<b>Method:</b>	Method 5	<b>Start Time:</b>	9:40	11:18	13:18	
<b>Parameter</b>	<b>Units</b>	<b>Stop Time:</b>		10:42	12:20	14:20		
Sampling Time	min.			60.00	60.00	60.00		<b>60.0</b>
<b>GAS METER DATA:</b>								
Average Meter Differential Pressure	in. H2O			3.0575	3.0875	3.1625		<b>3.10</b>
Absolute Meter Pressure	in. Hg			29.89	29.90	29.90		<b>29.90</b>
Average Meter Temperature	degrees F			82.9166667	91.5	88.9166667		<b>87.78</b>
Metered Dry Sample Gas Volume	dcf			57.135	58.226	57.396		<b>57.59</b>
Gas Molecular Weight, Dry Basis	lb/lb-mole			30.62	30.59	30.60		<b>30.60</b>
<b>Pre Test Calibration Factors</b>								
DeltaH@	in. H2O			1.785	1.785	1.785		<b>1.785</b>
Dry Gas Meter Correction Factor (gamma)	Dimensionless			1.0095	1.0095	1.0095		<b>1.0095</b>
<b>Post Test Data</b>								
Calculated Meter Correction Factor (Yqa)	Dimensionless			<b>1.0181</b>	<b>1.0123</b>	<b>1.0365</b>		<b>1.0223</b>
Difference (Post Test and Pretest Y - Maximum Allowed 5%)	%			<b>0.85%</b>	<b>0.27%</b>	<b>2.67%</b>		<b>1.27%</b>

# Type S Pitot Tube Inspection Data Form

Source Testing and Consulting Services, Inc

1100 Purple Glory Drive

Apex, NC 27502

PH(919)-367-2200/FAX(919)-367-2222

Pitot Tube I.D. #           P018            
 Location                   Shop                  

Date           08-Feb-04            
 Tech.                   MAD                  

Quick Connects Attached & Leak Free?                   y                    
 Pitot Tube Assembly Level?                   y                  

Parameter	Value	Acceptance Criteria	Results	Meets Criteria?
$\alpha_1 =$	<u>          1°          </u>	$\alpha_1 < 10^\circ$	<u>          1°          </u>	TRUE
$\alpha_2 =$	<u>          0°          </u>	$\alpha_2 < 10^\circ$	<u>          0°          </u>	TRUE
$\beta_1 =$	<u>          1°          </u>	$\beta_1 < 5^\circ$	<u>          1°          </u>	TRUE
$\beta_2 =$	<u>          0°          </u>	$\beta_2 < 5^\circ$	<u>          0°          </u>	TRUE
$\gamma =$	<u>          1°          </u>			
$\theta =$	<u>          0°          </u>			
A =	<u>          1.125"          </u>			
$z = A \sin \gamma =$	<u>          0.020"          </u>	$z < .125 \text{ in.}$	<u>          0.020"          </u>	TRUE
$w = A \sin \theta =$	<u>          0.000"          </u>	$w < 0.03125 \text{ in.}$	<u>          0.000"          </u>	TRUE
$P_A =$	<u>          0.557"          </u>	$1.05 Dt < P_A < 1.5 Dt$	<u>          0.557"          </u>	TRUE
$P_b =$	<u>          0.557"          </u>	$1.05 Dt < P_b < 1.5 Dt$	<u>          0.557"          </u>	TRUE
$D_t =$	<u>          0.375"          </u>	$0.18750" \leq Dt \leq 0.3750"$	<u>          0.375"          </u>	TRUE
		$P_A = P_b \pm 0.0630"$	<u>          0.000"          </u>	TRUE

Pitot Tube Acceptable ?..... **TRUE**

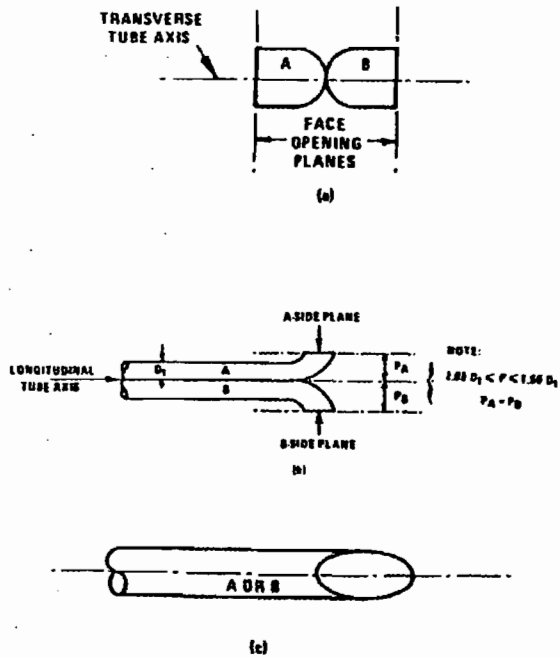


Figure 2-2. Properly constructed Type S pitot tube, shown in: (a) end view; face opening planes perpendicular to transverse axis; (b) top view; face opening planes parallel to longitudinal axis; (c) side view; both legs of equal length and centers coincident, when viewed from both sides. Baseline coefficient values of 0.84 may be assigned to pitot tubes constructed this way.

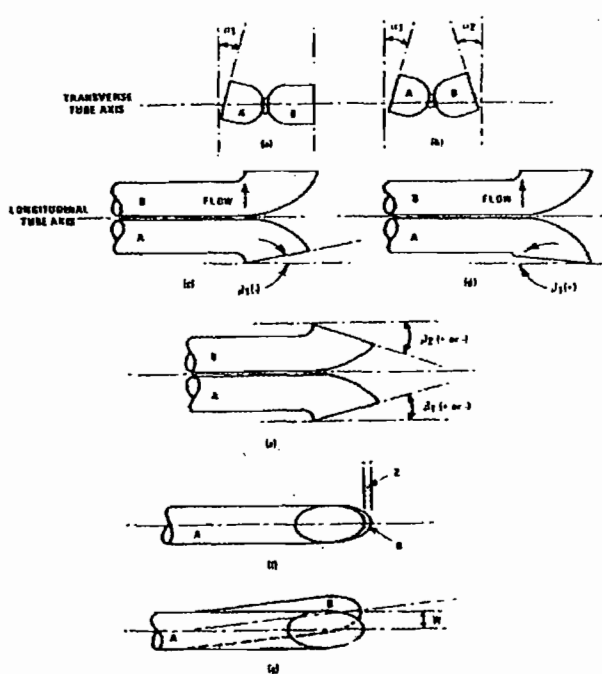


Figure 2-3. Types of face-opening misalignment that can result from field use or improper construction of Type S pitot tubes. These will not affect the baseline value of  $C_{pit}$  so long as  $\alpha_1$  and  $\alpha_2 \leq 10^\circ$ ,  $\beta_1$  and  $\beta_2 \leq 5^\circ$ ,  $z \leq 0.32 \text{ cm}$  (1/8 in.) and  $w \leq 0.08 \text{ cm}$  (1/32 in.) (citation 11 in Section 4).

**APPENDIX D**  
**PROCESS DATA**



Rayonier

Fernandina Mill

"A" SCRUBBER STACK TEST ANALYSIS

for 10-Jun-04

Steam Output from No. 2 Power Boiler

Run Number	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]		
	Power Boiler No. 1	Power Boiler No. 2	Total
A-1	90	105	195
A-2	100	97	198
A-3	93	105	197
Average	95	101	196
Capacity	120	120	240
A Scrubber Actual Total % of Capacity =			82%

Oil Input to Boiler

Run Number	Power Boiler No. 1				Power Boiler No. 2			
	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
A-1	718	61	155,833	110	0	61	155833	0.0
A-2	756	62	155833	114	0	62	155833	0.0
A-3	676	60	155,833	105	0	60	155,833	0.0
Average	737	62	155,833	112	0	62	155,833	0
Permit Maximum	[mmBTU/hr]			185				184

Test Result per Stack test

30.984
41.218
57.145
43

Allowable Particulate Emissions Calculation

Test total BTU input from Oil for B Scrubber	112	MM BTU/hr.	
Maximum Steam Output from 1 & 2 PB	240,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	82%		
Test Steam Output Rate	196,381	lb./hr. [135,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	72,831	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark [by difference]	123,550	lb./hr.	
Boiler Efficiency on Bark	55%	Permit Max.	
Test Heat Input from Bark	225	mmBTU/hr.	218
Emissions Factor for Bark	0.23	lb. PM/MMBTU	
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	51.7	lb. PM/hr [emissions factor x heat input]	50.6 #2 Bark Only
Allowable Emissions from Oil	9.6	lb. PM/hr [emissions factor x heat input]	15.2 #2 Oil Only
Total Allowable Emissions for A Scrubber	61.3	lb. PM/hr.	16.0 #1 Oil Only
Total Allowable Emissions for A Scrubber	61.3	lb. PM/hr.	(Including Oil Emissions)
Actual emissions for A Scrubber 10-Jun-04 Test	43.1	lb. PM/hr.	( By Oil Emissions Factor or Permit)

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Power Boilers Scrubber Test

Power Boiler Scrubber "A"  
 Date 6/10/2004  
 Run # A-1

	Start of Test		End of Test		Totals	Time
	hours	min	hours	min	min	Corrected
<b>Boiler No. 1</b>	12	03	13	04	61	0.98361
Steam Flow Integrator (x 1000)	381.2		472.8		91600	90098.4 lb/hr
Steam Temperature (° F)	758.9		787.3		773.1	
Drum Pressure (psig.)	388.8		336.4		362.6	
Oil Flow Intergrator (bbls.)	86.5		103.6		17.1	706 gal/hr
Steam Flow (lb/hr x 1000)	89.8		81.8		85.8	
Oil Flow (gpm)	9.5		11.6		10.55	
<b>Boiler No. 2</b>						
Steam Flow Integrator (x 1000)	428		534.9		106900	105148 lb/hr
Steam Temperature (° F)	715.7		743.1		729.4	
Drum Pressure (psig.)	392.1		340.9		366.5	
Oil Flow Intergrator (bbls.)	0		0		0	0 gal/hr
Steam Flow (lb/hr x 1000)	114.6		112.1		113350	
Oil Flow (gpm)	5.2		4.7		4.95	297 gal/hr
<b>Bark Integrator</b>	159.7		184.9		25.2	25 wet/tons/hr
Bark to Boiler: Num.(s) <u>2</u> And / or <u>3</u>						
<b>Scrubber "A" pH</b>	7.1		7.1		7.1	

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"A" SCRUBBER STACK TEST ANALYSIS

for 10-Jun-04

Steam Output from No. 1 & No. 2 Power Boilers

Run	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]		
Number	Power Boiler No. 1	Power Boiler No. 2	Total
A-1	90	105	195

Average	90	105	195
Capacity	120	120	240

A Scrubber Actual Total % of Capacity = 81%

Oil Input to Boilers

Run	Power Boiler No. 1				Power Boiler No. 2			
	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
A-1	718.2	61	155,833	110	0	61	155,833	0
Average	718	61	155,833	110	0	61	155,833	0
Permit Maximum	[mmBTU/hr]			185				184

Allowable Particulate Emissions Calculation

Test total BTU Input from Oil for A Scrubber	110	MM BTU/hr.	
Maximum Steam Output from 1 & 2 PB	240,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	81%		
Test Steam Output Rate	195,246	lb./hr. [240,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	71,555	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark [by difference]	123,691	lb./hr.	
Boiler Efficiency on Bark	55%		Permit Max.
Test Heat Input from Bark	225	mmBTU/hr.	218
Emissions Factor for Bark	0.23	lb. PM/MMBTU	
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	51.7	lb. PM/hr [emissions factor x heat input]	50.6 #2 Bark Only
Allowable Emissions from Oil	9.5	lb. PM/hr [emissions factor x heat input]	15.2 #2 Oil Only
Total Allowable Emissions for A Scrubber	61.2	lb. PM/hr.	16.0 #1 Oil Only
Total Allowable Emissions for A Scrubber	61.2	lb. PM/hr.	(Including Oil Emissions)
Total Allowable Emissions for A Scrubber	61.2	lb. PM/hr.	(By Oil Emissions Factor or Permit)
Actual emissions for A Scrubber Jun 2004 test	31.0	lb. PM/hr.	

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"A" SCRUBBER STACK TEST ANALYSIS

for 10-Jun-04

Steam Output from No. 1 & No. 2 Power Boilers

Run	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]		
Number	Power Boiler No. 1	Power Boiler No. 2	Total
A-2	100	97	198
Average	100	97	198
Capacity	120	120	240

A Scrubber Actual Total % of Capacity = 82%  
Oil Input to Boilers

Run Number	Power Boiler No. 1				Power Boiler No. 2			
	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
A-2	756	62	155,833	114	0	62	155,833	0
Average	756	62	155,833	114	0	62	155,833	0
Permit Maximum	[ mmBTU/hr ]			185				184

Allowable Particulate Emissions Calculation

Test total BTU Input from Oil for A Scrubber	114	MM BTU/hr.	
Maximum Steam Output from 1 & 2 PB	240,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	82%		
Test Steam Output Rate	197,516	lb./hr. [240,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	74,106	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark [by difference]	123,410	lb./hr.	
Boiler Efficiency on Bark	55%	Permit Max.	
Test Heat Input from Bark	224	mmBTU/hr.	<span style="border: 1px solid black; padding: 2px;">218</span>
Emissions Factor for Bark	0.23	lb. PM/MMBTU	<span style="border: 1px solid black; padding: 2px;">Maximum By Permit</span>
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	51.6	lb. PM/hr [emissions factor x heat input]	<span style="border: 1px solid black; padding: 2px;">50.6</span> #2 Bark Only
Allowable Emissions from Oil	9.8	lb. PM/hr [emissions factor x heat input]	<span style="border: 1px solid black; padding: 2px;">15.2</span> #2 Oil Only
Total Allowable Emissions for A Scrubber	61.4	lb. PM/hr. (Including Oil Emissions)	<span style="border: 1px solid black; padding: 2px;">16.0</span> #1 Oil Only
Total Allowable Emissions for A Scrubber	61.4	lb. PM/hr. (By Oil Emissions Factor or Permit)	
Actual emissions for A Scrubt Jun 2004 test]	41.2	lb. PM/hr.	

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Power Boilers Scrubber Test

Power Boiler Scrubber "A"  
 Date 6/10/2004  
 Run # A-2

	Start of Test		End of Test		Totals	Time
	hours	min	hours	min	min	Corrected
<b>Boiler No. 1</b>	14	43	15	45	62	0.96774
Steam Flow Integrator (x 1000)	633.2		736.7		103500	100161 lb/hr
Steam Temperature (° F)	801.5		778.2		789.85	
Drum Pressure (psig.)	353.3		305.5		329.4	
Oil Flow Intergrator (bbls.)	136.5		154.5		18	731.613 gal/hr
Steam Flow (lb/hr x 1000)	106		100.1		103.05	
Oil Flow (gpm)	13.1		11.3		12.2	
<b>Boiler No. 2</b>						
Steam Flow Integrator (x 1000)	657.7		758.3		100600	97354.8 lb/hr
Steam Temperature (° F)	745.8		720.9		733.35	
Drum Pressure (psig.)	349.9		299.2		324.55	
Oil Flow Intergrator (bbls.)	0		0		0	0 gal/hr
Steam Flow (lb/hr x 1000)	109.2		94.6		101900	
Oil Flow (gpm)	4.9		4.9		4.9	294 gal/hr
<b>Bark Integrator</b>	222.6		245.9		23.3	23 wet/tons/hr
Bark to Boiler: Num.(s) <u>2</u> And / or <u>3</u>						
<b>Scrubber "A" pH</b>	7.1		6.9		7.0	

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Power Boilers Scrubber Test

Power Boiler Scrubber "A"  
 Date 6/10/2004  
 Run # A-3

	Start of Test		End of Test		Totals	Time
	hours	min	hours	min	min	Corrected
<i>Time</i>	17	35	18	35	60	1
<b>Boiler No. 1</b>						
Steam Flow Integrator (x 1000)	875.9		968.6		92700	92700 lb/hr
Steam Temperature (° F)	766.6		795.6		781.1	
Drum Pressure (psig.)	359.7		318.6		339.15	
Oil Flow Intergrator (bbls.)	185.5		201.6		16.1	676 gal/hr
Steam Flow (lb/hr x 1000)	98.9		92.1		95.5	
Oil Flow (gpm)	10.9		12.3		11.6	
<hr/>						
<b>Boiler No. 2</b>						
Steam Flow Integrator (x 1000)	891.4		996		104600	104600 lb/hr
Steam Temperature (° F)	719		737.4		728.2	
Drum Pressure (psig.)	360.8		317.2		339	
Oil Flow Intergrator (bbls.)	0		0		0	0 gal/hr
Steam Flow (lb/hr x 1000)	114.1		103.3		108700	
Oil Flow (gpm)	5.3		4.6		4.95	297 gal/hr
<hr/>						
<b>Bark Integrator</b>	290.9		314.9		24	24 wet/tons/hr
Bark to Boiler: Num.(s) <u>2</u> And / or <u>3</u>						
<hr/>						
<b>Scrubber "A" pH</b>	7.1		7.0		7.1	

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"A" SCRUBBER STACK TEST ANALYSIS

for 10-Jun-04

Steam Output from No. 1 & No. 2 Power Boilers

Run Number	Power Boiler No. 1	Power Boiler No. 2	Total
A-3	93	105	197

Average 93 105 197

Capacity 120 120 240

A Scrubber Actual Total % of Capacity = 82%

Oil Input to Boilers

Run Number	Power Boiler No. 1				Power Boiler No. 2			
	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
A-3	676.2	60	155,833	105	0	60	155,833	0
Average	676	60	155,833	105	0	60	155,833	0

Permit Maximum	[mmBTU/hr]	185	184
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Allowable Particulate Emissions Calculation

Test total BTU Input from Oil for A Scrubber	105	MM BTU/hr.	
Maximum Steam Output from 1 & 2 PB	240,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	82%		
Test Steam Output Rate	197,300	lb./hr. [240,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	68,493	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark [by difference]	128,807	lb./hr.	
Boiler Efficiency on Bark	55%	Permit Max.	
Test Heat Input from Bark	234	mmBTU/hr.	218
Emissions Factor for Bark	0.23	lb. PM/MMBTU	
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	53.9	lb. PM/hr [emissions factor x heat input]	50.6 #2 Bark Only
Allowable Emissions from Oil	9.1	lb. PM/hr [emissions factor x heat input]	15.2 #2 Oil Only
Total Allowable Emissions for A Scrubber	62.9	lb. PM/hr. (Including Oil Emissions)	16.0 #1 Oil Only
Total Allowable Emissions for A Scrubber	62.9	lb. PM/hr. (By Oil Emissions Factor or Permit)	
Actual emissions for A Scrubt Jun 2004 test	57.1	lb. PM/hr.	

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**"B" SCRUBBER STACK TEST ANALYSIS**

for 9-Jun-04

**Steam Output from No. 3 Power Boiler**

Run Number	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam] Power Boiler No. 3
B1	122
B2	135
B3	116
Average	125
Capacity	135

B Scrubber Actual Total % of Capacity = 92%

**Oil Input to Boiler**

Power Boiler No. 3					
Run Number	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil	Test Result per Stack test
B1	230.58	52	155,833	41	20.90
B2	184.8	56	155,833	31	47.64
B3	142.8	61	155,833	22	34.44
Average	186	56	155,833	31	34.33
Permit Maximum [mmBtu/hr]				207	

**Allowable Particulate Emissions Calculation**

Test total BTU Input from Oil for B Scrubber	31	MM BTU/hr.	
Maximum Steam Output from 3 PB	135,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	92%		
Test Steam Output Rate	124,648	lb./hr. [135,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	20,411	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark [by difference]	104,237	lb./hr.	
Boiler Efficiency on Bark	55%	Permit Max.	
Test Heat Input from Bark	190	mmBTU/hr	<span style="border: 1px solid black; padding: 2px;">245</span>
Emissions Factor for Bark	0.207	lb. PM/MMBTU	Permit Maximum
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	39.2	lb. PM/hr [emissions factor x heat input]	50.6
Allowable Emissions from Oil	2.7	lb. PM/hr [emissions factor x heat input]	16.7
Total Allowable Emissions for B Scrubber	41.9	lb. PM/hr.	(Including Oil Emissions)
Total Allowable Emissions for B Scrubber	41.9	lb. PM/hr.	( By Oil Emissions Factor or Permit)
Actual emissions for B Scrubber 9-Jun-04 Test	<span style="border: 1px solid black; padding: 2px;">34.3</span>	lb. PM/hr.	



**"B" SCRUBBER STACK TEST ANALYSIS**

for 9-Jun-04

**Steam Output from No. 3 Power Boiler**

Run Number	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]
B1	122

Average 122

Capacity 135

B Scrubber Actual Total % of Capacity = 90%

**Oil Input to Boiler**

Power Boiler No. 3				
Run Number	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
B1	230.58	52	155,833	41
Average	231	52	155,833	41
Permit Maximum on Oil	[mmBtu/hr]			207
Permit Maximum on Bark	[mmBtu/hr]			245

**Allowable Particulate Emissions Calculation**

Test total BTU Input from Oil for B Scrubber	41	MM BTU/hr.	
Maximum Steam Output from 3 PB	135,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	90%		
Test Steam Output Rate	122,164	lb./hr. [135,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	26,949	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark	95,215	lb./hr.	
Boiler Efficiency on Bark	55%		Permit Max.
Test Heat Input from Bark	173	mmBTU/hr.	<span style="border: 1px solid black; padding: 2px;">245</span>
Emissions Factor for Bark	0.207	lb. PM/MMBTU	
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	35.8	lb. PM/hr [emissions factor x heat input]	<span style="border: 1px solid black; padding: 2px;">50.6</span> #3Bark Only
Allowable Emissions from Oil	3.6	lb. PM/hr [emissions factor x heat input]	<span style="border: 1px solid black; padding: 2px;">16.7</span> #3 Oil Only
Total Allowable Emissions for B Scrubber	39.4	lb. PM/hr.	(Including Oil Emissions)
Total Allowable Emissions for B Scrubber	39.4	lb. PM/hr.	( By Oil Emissions Factor or Permit)
Actual emissions for B Scrubber 9-Jun-04 Test	20.9	lb. PM/hr.	

**Power Boilers Scrubber Test**

Power Boiler Scrubber "B"  
 Date 09-Jun-04  
 Run # B1 -1

part 1 Combined

**Boiler No. 3**

	<u>Start of Test</u>		<u>End of Test</u>		<u>Totals</u>	<u>Time</u>	<u>Time</u>	
	hours	min	hours	min	min	<i>corrected</i>	<i>corrected</i>	
<i>Time</i>	12	28	13	20	52	1.15385	0.9836	
Steam Flow Integrator (x 1000)	467.4		574		106600	123000	122164	lb/hr
Steam Temperature (° F)	747.7		745		746.35			
Drum Pressure (psig.)	453.6		465		459.3			
Oil Flow Intergrator (bbl.)	19.8		25.29		5.49	266.054	268.11	gal/hr
Steam Flow (lb/hr x 1000)	125.8		122		123900			
Oil Flow (gpm)	5.1		5		5.05			
<b>Bark Integrator</b>	152.2		176.852		24.652	28	28	wet/ tons/ hr
<i>Bark to Boiler: Num.(s) <u>2</u> And / or <u>3</u></i>								
Scrubber "B" pH	8.1		8.0		8.1			

**Power Boilers Scrubber Test**

Power Boiler Scrubber "B"  
 Date 09-Jun-04  
 Run # B1 -2

Part 2

**Boiler No. 3**

Steam Flow Integrator (x 1000) \_\_\_\_\_  
 Steam Temperature (° F) \_\_\_\_\_  
 Drum Pressure (psig.) \_\_\_\_\_  
 Oil Flow Intergrator (bbl.) \_\_\_\_\_  
 Steam Flow (lb/hr x 1000) \_\_\_\_\_  
 Oil Flow (gpm) \_\_\_\_\_

	<u>Start of Test</u>		<u>End of Test</u>		<u>Totals</u>	<u>Time</u>
	hours	min	hours	min	min	<u>corrected</u>
<u>Time</u>	13	50	13	59	9	6.66667
Steam Flow Integrator (x 1000)	637.1		654.7		17600	117333 lb/hr
Steam Temperature (° F)	745.5		742.4		743.95	
Drum Pressure (psig.)	493.2		452		472.6	
Oil Flow Intergrator (bbl.)	33.2		34.2		1	280 gal/hr
Steam Flow (lb/hr x 1000)	125.1		128.5		126800	
Oil Flow (gpm)	5		4.9		4.95	
<b>Bark Integrator</b>	186.4		190.6		4.2	28 wet/tons/hr
<b>Bark to Boiler: Num.(s) <u>2</u> And / or <u>3</u></b>						
Scrubber "B" pH	7.9		7.9		7.9	

**"B" SCRUBBER STACK TEST ANALYSIS**

for 9-Jun-04

**Steam Output from No. 3 Power Boiler**

Run Number	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]	Power Boiler No. 3
B2	135	
Average	135	
Capacity	135	

B Scrubber Actual Total % of Capacity = 100%

**Oil Input to Boiler**

Power Boiler No. 3				
Run Number	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
B2	184.8	56	155,833	31
Average	185	56	155,833	31
Permit Maximum on Oil	[mmBtu/hr]			207
Permit Maximum on Bark	[mmBtu/hr]			245

**Allowable Particulate Emissions Calculation**

Test total BTU Input from Oil for B Scrubber	31	MM BTU/hr.	
Maximum Steam Output from 3 PB	135,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	100%		
Test Steam Output Rate	135,321	lb./hr. [135,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	20,056	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark	115,266	lb./hr.	
Boiler Efficiency on Bark	55%		Permit Max.
Test Heat Input from Bark	210	mmBTU/hr.	<span style="border: 1px solid black; padding: 2px;">245</span>
Emissions Factor for Bark	0.207	lb. PM/MMBTU	
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	43.4	lb. PM/hr [emissions factor x heat input]	<span style="border: 1px solid black; padding: 2px;">50.6</span> #3Bark Only
Allowable Emissions from Oil	2.7	lb. PM/hr [emissions factor x heat input]	<span style="border: 1px solid black; padding: 2px;">16.7</span> #3 Oil Only
Total Allowable Emissions for B Scrubber	46.0	lb. PM/hr.	(Including Oil Emissions)
Total Allowable Emissions for B Scrubber	46.0	lb. PM/hr.	( By Oil Emissions Factor or Permit)
Actual emissions for B Scrubber	9-Jun-04 Test	47.6	lb. PM/hr.

**Power Boilers Scrubber Test**

Power Boiler Scrubber            "B"  
 Date            09-Jun-04  
 Run #            B2

**Boiler No. 3**

Steam Flow Integrator (x 1000) \_\_\_\_\_  
 Steam Temperature (° F) \_\_\_\_\_  
 Drum Pressure (psig.) \_\_\_\_\_  
 Oil Flow Intergrator (bbl.) \_\_\_\_\_  
 Steam Flow (lb/hr x 1000) \_\_\_\_\_  
 Oil Flow (gpm) \_\_\_\_\_

	Start of Test		End of Test		Totals	Time corrected
	hours	min	hours	min	min	
Time	15	29	16	25	56	1.07143
Steam Flow Integrator (x 1000)	821		947.3		126300	135321 lb/hr
Steam Temperature (° F)	750.3		752.8		751.55	
Drum Pressure (psig.)	474.3		382		428.15	
Oil Flow Intergrator (bbl.)	40.8		45.2		4.4	198 gal/hr
Steam Flow (lb/hr x 1000)	140.5		132.2		136350	
Oil Flow (gpm)	3		5.8		4.4	
<b>Bark Integrator</b>	231.3		258.9		27.6	30 wet/tons/hr
Bark to Boiler: Num.(s) <u>  2  </u> And / or <u>  3  </u>						
Scrubber "B" pH	7.9		7.9		7.9	

**"B" SCRUBBER STACK TEST ANALYSIS**

for 9-Jun-04

**Steam Output from No. 3 Power Boiler**

Run Number	Power Boiler No. 3	Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]
B3	116	

Average 116

Capacity 135

B Scrubber Actual Total % of Capacity = 86%

**Oil Input to Boiler**

Power Boiler No. 3				
Run Number	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil
B3	143	61	155,833	22
Average	143	61	155,833	22
Permit Maximum on Oil			[mmBtu/hr]	207
Permit Maximum on Bark			[mmBtu/hr]	245

**Allowable Particulate Emissions Calculation**

Test total BTU Input from Oil for B Scrubber	22	MM BTU/hr.	
Maximum Steam Output from 3 PB	135,000	lb./hr. [1000 BTU Steam]	
Test Operating Rate	86%		
Test Steam Output Rate	116,459	lb./hr. [135,000 x test operating rate]	
Boiler Efficiency on Oil	65%		
Test Steam from Oil	14,227	lb./hr. [total input from oil x Eff. on oil]	
Test Steam from Bark [by difference]	102,232	lb./hr.	
Boiler Efficiency on Bark	55%		Permit Max.
Test Heat Input from Bark	186	mmBTU/hr.	<span style="border: 1px solid black; padding: 2px;">245</span>
Emissions Factor for Bark	0.207	lb. PM/MMBTU	
Emissions Factor for Oil	0.086	lb. PM/MMBTU	
Allowable Emissions from Bark	38.5	lb. PM/hr [emissions factor x heat input]	<span style="border: 1px solid black; padding: 2px;">50.6</span> #3Bark Only
Allowable Emissions from Oil	1.9	lb. PM/hr [emissions factor x heat input]	<span style="border: 1px solid black; padding: 2px;">16.7</span> #3 Oil Only
Total Allowable Emissions for B Scrubber	40.4	lb. PM/hr.	(Including Oil Emissions)
Total Allowable Emissions for B Scrubber	40.4	lb. PM/hr.	( By Oil Emissions Factor or Permit)
Actual emissions for B Scrubber 9-Jun-04 Test	34.4	lb. PM/hr.	



**Sulfite Recovery Boiler Scrubber Stack Test Analysis**

for 24-May-04

**Steam Output from the Sulfite Recovery Boiler**

Run Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]

Number Sulfite Recovery Boiler

1	375
2	399
3	354

Average 376

Oil Input to Boiler					Liquor Input to Boiler		Test Result
Sulfite Recovery Boiler							Particulate
Run Number	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil	Gal. Liquor	Liquor Flow lbs/hr.	(per Stack test) lbs/hr.
1	0	74	155,833	0	10407	65,111	21.2
2	0	63	155,833	0	11341	69,665	19.8
3	0	69	155,833	0	11295	66,210	23.1
Average	0	69	155,833	0	11,014	66,995	21.3

Permit Maximum [lbs/hr. SSL]	70,000
Recovery Boiler Actual Total % of Capacity =	96%
Standard Operating Max	63,000
Percent of Standard Operating Max	106%

Permit Maximum (particulate)	67.5 lbs/hr.
Permit Maximum (particulate)	67.5 lbs/hr.
Permit Limit	2.5 PM lb/ADTUP
Test Value	0.74 PM lb/ADTUP



### Recovery Boiler Compliance Test

Date: 24-May-04

Run: # 1

	Start of Test		End of Test		Difference	%of hour	
	hour	min	hour	min			
Time	11	16	12	30	74	0.810811	
"B" Liquor Flow, gallons	48247.5		61082.4		12834.9	10406.68	gph
Liquor Flow, gpm meter	174		174		174	10440	gph
Liquor Temperature, deg F	205		205		205		
Liquor Hydrometer Reading	1.255		1.255		1.255		
Liquor solids, % OD	59.6		59.5		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	378		376		377		
Steam Flow Integrator x 1000, lb	1822.5		2285.1		462600	375081.1	lb/hr
Steam Temperature, deg F	852		851		851.5		
Steam Pressure, psi	978		984		981		
SO2, ppm	248		248		248		

Liquor Flow Calculation	(gph)(8.345)(sp.gr.)(%OD)	65110.70 lb/hr
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Integrator Calculation: TSP Mass Emission Rate results: 21.15 lb/hr

(End of test value - Start of test value)(60 min./hr / Test time, min.) = Units/hr

### Recovery Boiler Compliance Test

Date: 24-May-04

Run: # 2

Time	Start of Test		End of Test		Difference	%of hour	
	hour	min	hour	min			
	15	35	16	38	63	0.952381	
"B" Liquor Flow, gallons	93925.7		105833.9		11908.2	11341.14	gph
Liquor Flow, gpm meter	190		190		190	11400	gph
Liquor Temperature, deg F	204		204		204		
Liquor Hydrometer Reading	1.255		1.255		1.255		
Liquor solids, % OD	58.7		58		58.35		
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	398		401		399.5		
Steam Flow Integrator x 1000, lb	3458.9		3877.9		419000	399047.6	lb/hr
Steam Temperature, deg F	868		869		868.5		
Steam Pressure, psi	1001		1003		1002		
SO2, ppm	226		238		232		

Liquor Flow Calculation	(gph)(8.345)(sp.gr.)(%OD)	69665.18 lb/hr
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Integrator Calculation: TSP Mass Emission Rate results: 19.75 lb/hr

(End of test value - Start of test value)(60 min./hr / Test time, min.) = Units/hr

### Recovery Boiler Compliance Test

Date: 24-May-04

Run: # 3

Start of Test                      End of Test

	hour	min	hour	min	Difference	%of hour	
Time	17	29	18	38	69	0.869565	
"B" Liquor Flow, gallons	77251.3		90240.3		12989	11294.78	gph
Liquor Flow, gpm meter	209		210		209.5	12570	gph
Liquor Temperature, deg F	192		192		192		
Liquor Hydrometer Reading	1.242		1.238		1.24		
Liquor solids, % OD	57.1		56.2		56.65		
No. of Liquor guns	8		8		8		
No. of oil guns	0		0		0		
No. of oil guns @ pressure	0		0		0		
Steam load, lbs/hr chart x 1000	395		393		394		
Steam Flow Integrator x 1000, lb	2502.7		2909.5		406800	353739.1	lb/hr
Steam Temperature, deg F	873		870		871.5		
Steam Pressure, psi	995		994		994.5		
SO <sub>2</sub> , ppm	239		238		238.5		

Liquor Flow Calculation	(gph)(8.345)(sp.gr.)(%OD)	66210.34 lb/hr
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Integrator Calculation:                      TSP Mass Emission Rate results: 23.10 lb/hr

(End of test value - Start of test value)(60 min./hr / Test time, min.) = Units/hr

**Sulfite Recovery Boiler Scrubber Stack Test Analysis**

for 25-May-04

**Steam Output from the Sulfite Recovery Boiler**

Run Steam Production [1000 lb./hr. of 1000 BTU/lb. Steam]

Number Sulfite Recovery Boiler

4	389
5	398
6	392
Average	393

Oil Input to Boiler					Liquor Input to Boiler		Test Result
Sulfite Recovery Boiler							Particulate
Run Number	Gal. Oil	Test Min.	BTU/gal	MMBTU/hr from Oil	Gal. Liquor	Liquor Flow lbs/hr.	(per Stack test) lbs/hr.
4	0	64	155,833	0	11226	68,046	25.0
5	0	189.5	155,833	0	11427	70,377	22.9
6	0	189.5	155,833	0	11283	68,557	30.2
Average	0	148	155,833	0	11,312	68,993	26.0

Permit Maximum [lbs/hr. SSL]	70,000
Recovery Boiler Actual Total % of Capacity =	99%
Standard Operating Max	63,000
Percent of Standard Operating Max	110%

Permit Maximum (particulate)	67.5 lbs/hr.
Permit Maximum (particulate)	67.5 lbs/hr.
Permit Limit	2.5 PM lb/ADTUP
Test Value	0.88 PM lb/ADTUP

### Recovery Boiler Compliance Test

Date: 25-May-04

Run: # 4

Time	Start of Test		End of Test		Difference	%of hour	
	hour	min	hour	min			
Time	9	40	10	44	64	0.9375	
"B" Liquor Flow, gallons	35865.5		47840.3		11974.8	11226.38	gph
Liquor Flow, gpm meter	187		187		187	11220	gph
Liquor Temperature, deg F	196		197		196.5		
Liquor Hydrometer Reading	1.246		1.25		1.248		
Liquor solids, % OD	57.6		58.8		58.2		
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 1001	388		389		388.5		
Steam Flow Integrator x 1000, lb	1212.7		1627.9		415200	389250	lb/hr
Steam Temperature, deg F	872		866		869		
Steam Pressure, psi	995		995		995		
SO2, ppm	185		198		191.5		

Liquor Flow Calculation	(gph)(8.345)(sp.gr.)(%OD)	68046.13 lb/hr
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Integrator Calculation: TSP Mass Emission Rate results: 24.97 lb/hr

(End of test value - Start of test value)(60 min./hr / Test time, min.) = Units/hr

### Recovery Boiler Compliance Test

Date: 25-May-04

Run: # 5

	Start of Test		End of Test		Difference	%of hour	
	hour	min	hour	min			
Time	11	18	12	22	64	0.9375	
"B" Liquor Flow, gallons	54053.3		66242.3		12189	11427.19	gph
Liquor Flow, gpm meter	189		190		189.5	11370	gph
Liquor Temperature, deg F	198		200		199		
Liquor Hydrometer Reading	1.25		1.256		1.253		
Liquor solids, % OD	58.8		59		58.9		
No. of Liquor guns	9		10		9.5		
No. of oil guns	0		0		0		
No. of oil guns @ pressure	0		0		0		
Steam load, lbs/hr chart x 1002	392		397		394.5		
Steam Flow Integrator x 1000, lb	1844.3		2269.2		424900	398343.8	lb/hr
Steam Temperature, deg F	864		868		866		
Steam Pressure, psi	998		999		998.5		
SO2, ppm	201		210		205.5		

Liquor Flow Calculation	(gph)(8.345)(sp.gr.)(%OD)	70377.21 lb/hr
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Integrator Calculation: TSP Mass Emission Rate results: 22.91 lb/hr

(End of test value - Start of test value)(60 min./hr / Test time, min.) = Units/hr

### Recovery Boiler Compliance Test

Date: 25-May-04

Run: # 6

	Start of Test		End of Test		Difference	%of hour	
	hour	min	hour	min			
Time	13	11	14	22	71	0.84507	
"B" Liquor Flow, gallons	75531		88882.3		13351.3	11282.79	gph
Liquor Flow, gpm meter	189		190		189.5	11370	gph
Liquor Temperature, deg F	200		201		200.5		
Liquor Hydrometer Reading	1.256		1.244		1.25		
Liquor solids, % OD	59		57.5		58.25		
No. of Liquor guns	9		9		9		
No. of oil guns	0		0		0		
No. of oil guns @ pressure	0		0		0		
Steam load, lbs/hr chart x 1003	394		393		393.5		
Steam Flow Integrator x 1000, lb	2593.2		3056.6		463400	391605.6	lb/hr
Steam Temperature, deg F	866		866		866		
Steam Pressure, psi	998		998		998		
SO2, ppm	234		238		236		

Liquor Flow Calculation	(gph)(8.345)(sp.gr.)(%OD)	68556.52 lb/hr
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Integrator Calculation: TSP Mass Emission Rate results: 30.2 lb/hr

(End of test value - Start of test value)(60 min./hr / Test time, min.) = Units/hr

Date 5/24/2004 Test Start Time 11:06  
 Test # 1 Avg Wet 18.86  
 Avg Dry 19.22

Readouts from the mill particulate meter

readout #	Time	Wet	Dry
1	11:19	17.37	17.79
2	11:24	20.72	21.15
3	11:35	16.55	16.79
4	11:40	21.02	21.6
5	11:51	17.34	17.64
6	11:57	25.11	25.58
7	12:07	17.08	17.4
8	12:12	18.35	18.64
9	12:23	16.93	17.19
10	12:29	18.1	18.45

Date 5/24/2004 Test Start Time 15:30  
 Test # 2 Avg Wet 18.58  
 Avg Dry 19.47

Readouts from the mill particulate meter

readout #	Time	Wet	Dry
1	15:37	17.22	18.07
2	15:43	21.82	22.79
3	15:53	18.81	19.65
4	15:59	16.91	17.76
5	16:09	18.51	19.55
6	16:15	17.84	18.58
7	16:20	17.34	18.13
8	16:31	20.17	21.21

Date 5/24/2004 Test Start Time 17:23  
 Test # 3 Avg Wet 19.35  
 Avg Dry 20.34

Readouts from the mill particulate meter

readout #	Time	Wet	Dry
1	17:31	17.71	18.72
2	17:36	20.01	21.23
3	17:46	18.38	19.25
4	17:53	21.45	22.52
5	18:03	18.36	19.21
6	18:08	20.25	21.28
7	18:19	18.8	19.67
8	18:25	19.84	20.82



Date    5/25/2004            Test Start Time    9:35  
 Test #    4            Avg Wet    18.54  
    Avg Dry    19.29

Readouts from the mill particulate meter

readout #	Time	Wet	Dry
1	9:43	18.18	18.97
2	9:48	23.2	24.03
3	9:58	17.48	18.15
4	10:04	18.05	18.83
5	10:15	17.72	18.337
6	10:20	20.21	21.16
7	10:31	17.18	17.86
8	10:36	16.28	16.98

Date    5/25/2004            Test Start Time    11:09  
 Test #    5            Avg Wet    18.20  
    Avg Dry    19.04

Readouts from the mill particulate meter

readout #	Time	Wet	Dry
1	11:18	16.86	17.68
2	11:25	21.5	22.39
3	11:35	18.66	19.41
4	11:41	20.58	21.46
5	11:52	18.37	19.15
6	11:58	18.34	19.39
7	12:07	15.91	16.663
8	12:13	15.38	16.18

18.2

Date    5/25/2004            Test Start Time    13:05  
 Test #    6            Avg Wet    18.75  
    Avg Dry    19.85

Readouts from the mill particulate meter

readout #	Time	Wet	Dry
1	13:14	17.32	18.38
2	13:19	20.94	22.35
3	13:28	16.7	17.6
4	13:35	21.28	22.55
5	13:45	16.3	17.18
6	13:51	20.38	21.57
7	14:02	17.5	18.44
8	14:07	19.58	20.75

**APPENDIX E**  
**PROJECT PARTICIPANTS**

## PROJECT PARTICIPANTS

### STACS

Bill Mayhew	Project Manager
Jon Proulx	Environmental Scientist
Geoff Johnson	Environmental Technician
Lee Garcia	Environmental Technician
Sid Carter	Environmental Technician
Aaron Harden	Document Coordinator

### RAYONIER

Ronnie Moore	Coordinator
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**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. F. J. Perrett, Environmental Manager  
 Rayonier Performance Fibers LLC  
 Fernandina Beach Mill  
 The Foot of the Gum Tree  
 Post Office Box 2002  
 Fernandina Beach, FL 32035-2002

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
 X *Claire Duker*  Agent  Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Transfer from service label) **7000 1670 0013 3110 0154**

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

**OFFICIAL USE**

H5TD  
 DTE  
 ETNN  
 029T  
 0002

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		

Mr. F. J. Perrett, Environmental Manager  
 Rayonier Performance Fibers LLC  
 Fernandina Beach Mill  
 The Foot of the Gum Tree  
 Post Office Box 2002  
 Fernandina Beach, FL 32035-2002

PS Form 3800, May 2000 See Reverse for Instructions

1. BRUCE MITCHELL 2. DARM - TALLY

3. MS 5505 5. \_\_\_\_\_

PLEASE PREPARE REPLY FOR:

- SECRETARY'S SIGNATURE
- DIV/DIST DIR SIGNATURE
- MY SIGNATURE
- YOUR SIGNATURE
- DUE DATE \_\_\_\_\_

ACTION/DISPOSITION

- DISCUSS WITH ME
- COMMENTS/ADVISE
- REVIEW AND RETURN
- SET UP MEETING
- FOR YOUR INFORMATION
- HANDLE APPROPRIATELY
- INITIAL AND FORWARD
- SHARE WITH STAFF
- FOR YOUR FILES

COMMENTS:

RECEIVED  
SEP 16 2005  
BUREAU OF AIR REGULATION

FROM: KHALID AL-NAHDY DATE: 9/13/05 PHONE: 804-3243

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

7001 0320 0001 3692 1926

**OFFICIAL USE**

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		

Postmark  
Here

T Se St or Cr	Mr. F. J. Perrett	
	General Manager	
	Rayonier, Inc.	
	Post Office Box 2002	
	Fernandina Beach, FL 32035-2002	

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

Mr. F. J. Perrett, Environmental Manager  
 Rayonier Performance Fibers LLC  
 Fernandina Beach Mill  
 The Foot of the Gum Tree  
 Post Office Box 2002  
 Fernandina Beach, FL 32035-2002

**2. Article Number**

(Transfer from service label)

7001 D320 0001 3692 3999

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *Theresa Mason*  Agent  Addressee

B. Received by (Printed Name) C. Date of Delivery

*Theresa Mason* 12/13

D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below:

*2002*

**3. Service Type**

- Certified Mail  Express Mail
- Registered  Return Receipt for Merchandise
- Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

**U.S. Postal Service  
 CERTIFIED MAIL RECEIPT  
 (Domestic Mail Only; No Insurance Coverage Provided)**

OFFICIAL USE

7001 0320 0001 3692 3999

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark  
Here

Mr. F. J. Perrett, Environmental Manager  
 Rayonier Performance Fibers LLC  
 Fernandina Beach Mill  
 The Foot of the Gum Tree  
 Post Office Box 2002  
 Fernandina Beach, FL 32035-2002

PS Form 3800, January 2001

See Reverse for Instructions

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

7000 1670 0013 3110 0093

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark  
Here

Mr. F. J. Perrett, Environmental Manager  
 Rayonier Performance Fibers LLC  
 Fernandina Beach Mill  
 The Foot of the Gum Tree  
 Post Office Box 2002  
 Fernandina Beach, FL 32035-2002



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <input checked="" type="checkbox"/> Ruth a Benjamin <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)  Ruth a Benjamin</p> <p>C. Date of Delivery  2-3-06</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Mr. F. J. Perrett, Environmental Manager  Rayonier Performance Fibers LLC  Fernandina Beach Mill  The Foot of the Gum Tree  Post Office Box 2002  Fernandina Beach, FL 32035-2002</p>	<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number  (Transfer from service label)</p> <p>7000 1670 0013 3110 0079</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

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OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee <small>(Endorsement Required)</small>		
Restricted Delivery Fee <small>(Endorsement Required)</small>		

Mr. F. J. Perrett, Environmental Manager  
Rayonier Performance Fibers LLC  
Fernandina Beach Mill  
The Foot of the Gum Tree  
Post Office Box 2002  
Fernandina Beach, FL 32035-2002

PS Form 3800, May 2000 See Reverse for Instructions

7000 1670 0013 3110 0079

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

OFFICIAL USE

7000 1670 0013 3110 0529

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark  
Here

Mr. F. J. Perrett, Environmental Manager  
 Rayonier Performance Fibers LLC  
 Fernandina Beach Mill  
 The Foot of the Gum Tree  
 Post Office Box 2002  
 Fernandina Beach, FL 32035-1309

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