


# Florida Department of Environmental Protection

## Memorandum

TO: Joseph Kahn, Division of Air Resource Management

THROUGH: Trina Vielhauer, Bureau of Air Regulation  
Jeff Koerner, New Source Review Section SA for

FROM: Bruce Mitchell 

DATE: September 25, 2008

SUBJECT: Air Permit No. PSD-FL-393  
Project No. 1070005-045-AC  
Georgia-Pacific Consumer Products LLC  
Palatka Mill, Modifications to the No. 4 Combination Boiler

The Final Permit for this project is attached for your approval and signature, which authorizes the following major modifications to the No. 4 Combination Boiler in two phases. The initial phase includes: upgrades to the bark/wood delivery system with new air swept bark conveyors and feed bin to increase bark/wood firing rate; increasing the maximum hourly heat input rate from 512.7 to 564 MMBtu per hour of bark/wood burning and restrict the annual bark/wood burning to 4,042,127 MMBtu; installation of a new overfire air (OFA) system; installation of a new mechanical collector to replace the existing multi-clone pre-cleaner; installation of a bottom ash handling system; modification of ductwork to use the existing multi-clone/ESP/stack from the No. 5 Power Boiler (which has been converted to natural gas) to serve the No. 4 Combination Boiler in parallel with the existing multi-clone/ESP/stack; and modification of ductwork to introduce the dilute non-condensable gases into the new OFA system.

The second phase is to convert the supplemental residual oil firing system for the No. 4 Combination Boiler to natural gas and permanently discontinue use of residual oil. This phase includes installation of a low-NO<sub>x</sub> gas burner system with a capacity of 427 MMBtu per hour as well as additional pipeline capacity from the natural gas vendor, the Florida Gas Transmission Company.

The Department distributed an initial Intent to Issue Permit package on May 9, 2008. The applicant published the Public Notice of Intent to Issue in the Palatka Daily News on May 24, 2008. The Department received the proof of publication on June 2, 2008. Significant comments were received from the permittee during the comment period such that a revised Intent to Issue permit package was issued and the initial Intent to Issue Permit package was rescinded. The applicant published the revised Public Notice of Intent to Issue in the Palatka Daily News on August 21, 2008. The Department received the proof of publication on August 27, 2008. No comments were received. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed.

The 30-day comment period ends on Saturday, September 20, 2008. We can issue the final permit on or after Monday, September 22, 2008.

I recommend your approval of the attached Final Permit for this project.

Attachments

## FINAL DETERMINATION

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### PERMITTEE

Georgia-Pacific Consumer Products LLC  
P.O. Box 919  
Palatka, Florida 32178-0919

### PERMITTING AUTHORITY

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation, Air Permitting North Section  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida 32399-2400

### PROJECT

Air Permit No. PSD-FL-393  
Project No. 1070005-045-AC  
Palatka Mill

This project authorizes the following modifications to the No. 4 Combination Boiler in two phases. The initial phase includes the following:

- Upgrades to the bark/wood delivery system with new air swept bark conveyors and feed bin to increase bark/wood firing rate;
- Increasing the maximum hourly heat input rate from 512.7 to 564 MMBtu per hour of bark/wood burning and restrict the annual bark/wood burning to 4,042,127 MMBtu;
- Installation of a new overfire air (OFA) system;
- Installation of a new mechanical collector to replace the existing multiclone pre-cleaner;
- Installation of a bottom ash handling system;
- Modification of ductwork to use the existing multiclone/ESP/stack from the No. 5 Power Boiler (which has been converted to natural gas) to serve the No. 4 Combination Boiler in parallel with the existing multiclone/ESP/stack; and
- Modification of ductwork to introduce the dilute non-condensable gases into the new OFA system.

The second phase is to convert the supplemental residual oil firing system for the No. 4 Combination Boiler to natural gas and permanently discontinue use of residual oil. This phase includes installation of a low-NO<sub>x</sub> gas burner system with a capacity of 427 MMBtu per hour as well as additional pipeline capacity from the natural gas vendor, the Florida Gas Transmission Company (FGTC).

The equipment modifications will be made at the existing Palatka Mill located North of CR 216 and West of US 17, in Palatka, Putnam County, Florida. The project results in a major source air construction permit and is subject to PSD preconstruction review for PM/PM<sub>10</sub>, NO<sub>x</sub>, VOC and CO.

### NOTICE AND PUBLICATION

The Department distributed an initial Intent to Issue Permit package on May 9, 2008. The applicant published the Public Notice of Intent to Issue in the Palatka Daily News on May 24, 2008. The Department received the proof of publication on June 2, 2008. Significant comments were received from the permittee during the comment period such that a revised Intent to Issue permit package was issued and the initial Intent to Issue Permit package was rescinded. The applicant published the revised Public Notice of Intent to Issue in the

## FINAL DETERMINATION

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Palatka Daily News on August 21, 2008. The Department received the proof of publication on August 27, 2008. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed.

### COMMENTS

No comments on the Revised Draft Permit were received from the public, the Northeast District, office, EPA Region 4, the Fish and Wildlife Service or the applicant.

In drafting the final permit documents, the Department discovered an error in Condition 12a, Section 3, Subsection A, of the permit. In the second sentence, the "initial interim period" was revised from 12 to 18 months in the revised draft permit; however, the last sentence of this paragraph then refers to a 12-month initial interim period. This was corrected in the final permit from 12 to 18 months.

### CONCLUSION

The final action of the Department is to issue the permit as noticed with the noted correction.

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**NOTICE OF FINAL PERMIT**

In the Matter of an  
Application for Permit by:

Georgia-Pacific Consumer Operations LLC  
Post Office Box 919  
Palatka, Florida 32178-0919

Air Permit No. PSD-FL-393  
Project No. 1070005-045-AC  
Georgia-Pacific Palatka Mill  
No. 4 Combination Boiler Modifications

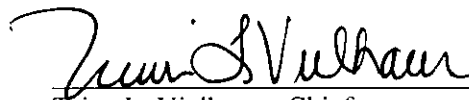
*Authorized Representative:*

Mr. Keith Wahoske, Vice President

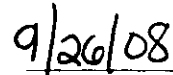
Georgia-Pacific Consumer Operations LLC operates the existing paper and pulp mill in Putnam County located North of County Road 216 and West of U.S. Highway 17 in Palatka, Florida. This final air construction permit authorizes modification to the No. 4 Combination Boiler in two phases. The initial phase includes the following changes: upgrading the bark/wood delivery system with new air swept bark conveyors and feed bin to increase bark/wood firing rate; increasing the maximum hourly heat input rate; installation of a new overfire air (OFA) system; installing new mechanical collectors to replace the existing multiclone pre-cleaners; installing a bottom ash handling system; modifying the ductwork to use the existing multiclones/electrostatic precipitator (ESP)/stack from the No. 5 Power Boiler (which has been converted to natural gas) to serve the No. 4 Combination Boiler in parallel with the existing multiclones/ESP/stack; and modifying the ductwork to introduce the dilute noncondensable gases (DNCG) into the new OFA system. The second phase will convert the supplemental residual oil firing system for No. 4 Combination Boiler to natural gas and permanently discontinue use of residual oil. Implementing this phase is dependent on obtaining additional pipeline capacity from the natural gas vendor, the Florida Gas Transmission Company, which may take approximately two to three years depending on the siting process for new pipelines as well as construction. This permit is issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida



Trina L. Vielhauer, Chief  
Bureau of Air Regulation



(Date)

TLV/jfk/bm

**NOTICE OF FINAL PERMIT**

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**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Determination and the Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 9/29/08 to the persons listed below.

Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC ([keith.wahoske@gapac.com](mailto:keith.wahoske@gapac.com))

Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC ([michael.curtis@gapac.com](mailto:michael.curtis@gapac.com))

Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC ([mjaguila@gapac.com](mailto:mjaguila@gapac.com))

Mr. Wayne Galler, Georgia-Pacific Consumer Operations LLC ([wjgaller@gapac.com](mailto:wjgaller@gapac.com))

Mr. David Buff, P.E., Golder Associates, Inc. ([dbuff@golder.com](mailto:dbuff@golder.com))

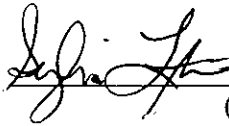
Mr. Chris Kirts, Northeast District Office ([christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us))

Ms. Katy Forney, U.S. EPA, Region 4 ([forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov))

Ms. Catherine Collins, Fish and Wildlife Service ([catherine\\_collins@fws.gov](mailto:catherine_collins@fws.gov))

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_

(Clerk)

9/29/08  
(Date)



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## PERMITTEE

Georgia-Pacific Consumer Operations LLC  
Post Office Box 919  
Palatka, Florida 32178-0919

*Authorized Representative:*  
Mr. Keith Wahoske, Vice President

Air Permit No. PSD-FL-393  
Project No. 1070005-045-AC  
Georgia-Pacific Palatka Mill  
No. 4 Combination Boiler Modifications  
SIC Nos. 2611 and 2621  
Permit Expires: July 1, 2011

## FACILITY AND LOCATION

This permit authorizes several physical modifications to the No. 4 Combination Boiler. The proposed work will be conducted at the existing Palatka Mill, which is a paper and pulp mill. The facility is located North of County Road 216 and West of U.S. Highway 17 in Palatka, Putnam County, Florida. The map coordinates are: UTM Zone 17; 434.0 km East; and 3283.4 km North.

## STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.), and Part 63 of Title 40 of the Code of Federal Regulations (CFR). Specifically, the project is subject to the preconstruction requirements for the Prevention of Significant Deterioration (PSD) of Air Quality in accordance with Rule 62-212.400, F.A.C. The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

## CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

  
\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management

9/26/08  
\_\_\_\_\_  
Effective Date

## SECTION 1. GENERAL INFORMATION

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### FACILITY AND PROJECT DESCRIPTION

The Georgia-Pacific Consumer Operations LLC operates an existing pulp and paper mill in Palatka, Florida. The existing mill uses the Kraft sulfate process in which the digesting liquor (white liquor) is a solution of sodium hydroxide and sodium sulfide that is mixed with wood chips and cooked under pressure. The spent liquor, known as weak black liquor, is concentrated and sodium sulfate is added to make up for chemical losses. The black liquor solids (BLS) are burned in the recovery furnace to produce a smelt of sodium carbonate and sodium sulfide. The smelt is dissolved in water to form green liquor to which quicklime (calcium oxide) is added to convert the sodium carbonate back to sodium hydroxide, which reconstitutes the cooking liquor. The spent lime cake (calcium carbonate) is recalcined in a rotary lime kiln to produce quicklime, which is used to process the green liquor to cooking liquor. Steam and energy needs are met by the combination, power and recovery boilers, which burn a variety of fuels including carbonaceous fuel, BLS, fuel oil and natural gas. Products of incomplete combustion include carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), particulate matter (PM), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>), sulfuric acid mist (SAM), sulfur dioxide (SO<sub>2</sub>), total reduced sulfur (TRS) and volatile organic compounds (VOC).

### FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

### PROJECT DESCRIPTION

#### Current Project

The No. 4 Combination Boiler (EU-016) will be modified in two phases. The initial phase includes the following changes: upgrading the bark/wood delivery system with new air swept bark conveyors and feed bin to increase bark/wood firing rate; increasing the maximum hourly heat input rate; installation of a new overfire air (OFA) system; installing new mechanical collectors to replace the existing multiclone pre-cleaners; installing a bottom ash handling system; modifying the ductwork to use the existing multiclones/electrostatic precipitator (ESP)/stack from the No. 5 Power Boiler (which has been converted to natural gas) to serve the No. 4 Combination Boiler in parallel with the existing multiclones/ESP/stack; and modifying the ductwork to introduce the dilute noncondensable gases (DNCG) into the new OFA system. The second phase will convert the supplemental residual oil firing system for No. 4 Combination Boiler to natural gas and permanently discontinue use of residual oil. Implementing this phase is dependent on obtaining additional pipeline capacity from the natural gas vendor, the Florida Gas Transmission Company, which may take approximately two to three years depending on the siting process for new pipelines as well as construction.

Based on a netting analysis including other contemporaneous projects, this project is subject to PSD preconstruction review for emissions of CO, NO<sub>x</sub>, PM<sub>10</sub> and VOC in accordance with Rule 62-212.400, F.A.C. The permit establishes emissions standards for these pollutants based on the Best Available Control Technologies (BACT) as determined by the Department. Particulate matter emissions will be controlled with new mechanical collectors and an improved ESP system. A continuous opacity monitoring system (COMS) is required to demonstrate compliance with the new opacity standard. Emissions of CO, NO<sub>x</sub> and VOC will be controlled by improving overall combustion and staging combustion with the upgraded OFA system. Low-NO<sub>x</sub> burners will be installed to further reduce NO<sub>x</sub> emissions when firing natural gas. Continuous emissions

## SECTION 1. GENERAL INFORMATION

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monitoring systems (CEMS) are required for CO and NO<sub>x</sub> to demonstrate compliance, which will also provide feedback to the control system and operators.

### Previous Projects

Based on the following previous projects, the No. 4 Combination Boiler is currently authorized to operate as a control device in the following circumstances.

- Pursuant to previous air construction Permit No. 1070005-017-AC, the No. 4 Combination Boiler is authorized to serve as a backup destruction device to the Thermal Oxidizer (EU-037) for noncondensable gases (NCG) and condensate stripper off-gases (SOG) from the sources subject to Subpart S (MACT 1) of 40 CFR 63 and Rule 62-296.404, F.A.C., for TRS emissions. Prior to destruction in the boiler, a spray tower pre-scrubber removes sulfur compounds from the batch digesting system and a separate spray tower pre-scrubber removes sulfur compounds from the multiple effect evaporator system streams. Operation as a backup destruction device would occur during startup, shutdown and malfunctions of the Thermal Oxidizer. The boiler is permitted to operate as the backup destruction device for a maximum uptime of 20%. These provisions also include a requirement to continuously monitor the combustion zone temperature with a thermocouple in lieu of monitoring TRS emissions.
- Pursuant to previous air construction Permit No. 1070005-024-AC, the No. 4 Combination Boiler is authorized to destroy DNCG from the brown stock washer system and associated pressure knotters and screens, the oxygen delignification (OD) system, the post-OD washer and the bleach plant washer. The No. 5 Power Boiler serves as a backup unit to the No. 4 Combination Boiler for the destruction of DNCG.

These provisions are specified in the latest Title V air operation permit (No. 1070005-048-AV). This project does not impose any new applicable requirements for operation as a control device.



## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority. The Permitting Authority for this project is the Bureau of Air Regulation in the Department's Division of Air Resource Management. The mailing address for the Bureau of Air Regulation is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to Department's Northeast District office.
2. Compliance Authority. All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northeast District office. The mailing address and phone number of the Department of Environmental Protection, Northeast District, Air Resources, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590. The District telephone number is 904/807-3300 and facsimile number is 904/448-4363.
3. Appendices. The following Appendices are attached as an enforceable part of this permit:
  - a. Appendix A. Citation Formats and Glossary of Common Terms.
  - b. Appendix B. General Conditions.
  - c. Appendix C. Common Conditions.
  - d. Appendix D. Standard Testing Requirements.
  - e. Appendix E. Summary of Best Available Control Technology Determinations.
  - f. Appendix F. Standard Continuous Monitoring Requirements.
  - g. Appendix G. On-Specification Used Oil Requirements.
4. Applicable Regulations, Forms and Application Procedures. Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions. For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications. No emissions unit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Source Obligation.
  - a. Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit.
  - b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) 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

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

- c. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

8. Title V Permit. This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. Depending on the timing of Phase 2 of this project, it may be necessary to submit an application to revise the Title V permit after completing the Phase 1 work and later apply for a revision to include the Phase 2 work. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to each Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. No. 4 Combination Boiler (EU-016)

This section of the permit addresses the following emissions unit.

#### No. 4 Combination Boiler (EU-016)

The boiler is a spreader-stoker traveling grate furnace with a pneumatic fuel feed distribution system. It was manufactured by Babcock & Wilcox and constructed in 1965. The primary fuel is bark/wood, which is supplemented with fuel oil. This project will replace supplemental fuel oil with natural gas. The maximum steam production rate is 475,000 lb/hour based on steam conditions of 900° F at 1275 psi. Particulate matter emissions are controlled by mechanical dust collectors as pre-cleaners to the ESP. The boiler also serves as a backup control device for other permitted operations. The unit continuously monitors TRS emissions. This project will add CO and NO<sub>x</sub> CEMS and an opacity COMS.

#### EXISTING APPLICABLE REGULATIONS

1. Existing Permits and Regulations: This permit supplements other previously issued air permits for the No. 4 Combination Boiler, which include the following applicable state and federal regulations.
  - a. Pursuant to Rule 62-296.404(3)(a)1, F.A.C., the No. 4 Combination Boiler is subject to the applicable requirements for a combustion device incinerating TRS emissions at a Kraft pulp mill.
  - b. Pursuant to Rule 62-296.410(1)(b), F.A.C., the No. 4 Combination Boiler is subject to the applicable requirements for an existing carbonaceous fuel fired boiler.
  - c. Pursuant to 40 CFR 63.443(d)(4)(ii), the No. 4 Combination Boiler is subject to the applicable requirements for controlling HAP emissions from the pulping system at Kraft processes. [NESHAP Subpart S in 40 CFR 63]

*{Permitting Note: The applicable requirements are specified in the latest Title V air operation permit (No. 1070005-048-AV). This project does not impose any new applicable requirements from these existing regulations.}* [Rules 62-296.404 and 62-296.410, F.A.C.; and 40 CFR 63.443]

#### MODIFICATIONS AND CAPACITIES

2. Modifications – Phase 1: The permittee shall make the following modifications and other related work to the No. 4 Combination Boiler:
  - a. Upgrade the bark/wood waste fuel delivery system by replacing worn out feed system parts, replacing the existing bark surge bin, modifying conveyors to accommodate these changes, and installing new air swept bark distributors;
  - b. Install a new OFA system with multiple levels of combustion air;
  - c. Modify the DNCG piping for incorporation into the new OFA system;
  - d. Replace existing multiclones with a new mechanical dust collector; and
  - e. Modify the ductwork to use the existing multiclones/ESP/stack from the No. 5 Power Boiler (EU-015, which has been converted to fire only natural gas) to connect in parallel service with the new mechanical dust collector/existing ESP/existing stack for the No. 4 Combination Boiler.

The purpose of this phase is to improve overall combustion, increase the maximum hourly heat input rate for bark/wood firing, improve equipment reliability and reduce NO<sub>x</sub> and PM emissions. These modifications shall be complete prior to operating at the higher heat input rates authorized by this permit. The permittee shall begin construction on this phase within 18 months of issuance of this permit. [Rules 62-4.070(3) and 62-212.400(12), F.A.C., and Application No. 1070005-045-AC (PSD-FL-393)]

6. Modifications – Phase 2: The permittee is authorized to make the following modifications to the No. 4

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. No. 4 Combination Boiler (EU-016)**

Combination Boiler and other related work:

- a. Install low-NO<sub>x</sub> burners with a natural gas distribution system; and
- b. Connect to the natural gas supply line for continuous operation.

The natural gas vendor, the Florida Gas Transmission Company, estimates that it may take approximately two to three years to add the necessary capacity to the pipeline for this project. Therefore, the permittee shall commence construction on this phase of the project within 18 months of July 1, 2010. Once the boiler is fully functional on natural gas, the boiler is prohibited from firing fuel oil. [Rules 62-4.070(3) and 62-212.400(12), F.A.C., and Application No. 1070005-045-AC (PSD-FL-393)]

- 7. **PM Control Equipment:** On each exhaust stream, the permittee shall install, operate and maintain mechanical dust collectors and an ESP to control PM emissions. The following table summarizes the main preliminary control equipment parameters for these systems.

Parameter	Exhaust 1 <sup>a</sup>	Exhaust 2 <sup>b</sup>
<b>Pre-Cleaner</b>		
Type	Mechanical Dust Collectors	Mechanical Dust Collectors
Inlet Temperature	480° F	480° F
Exhaust Flow Rate	280,000 acfm	280,000 acfm
Pressure Drop	< 3 inches of w.c.	< 3 inches of w.c.
Control Efficiency	80% - 90%	80% - 90%
<b>ESP</b>		
Manufacturer	Research Cottrell	Research Cottrell
Type	Plate/Rigid Mast Electrodes	Plate/Rigid Mast Electrodes
Configuration	2 chambers, 3 fields	2 chambers, 3 fields
Pressure	Positive	Positive
T/R Sets	6 T/R sets per field	6 T/R sets per field
Inlet Temperature	475° F	475° F
Exhaust Flow Rate	230,000 acfm	230,000 acfm
Control Efficiency	99.5%	99.5%
<b>Stack</b>		
Diameter	8.0 feet	8.0 feet
Height	237 feet	237 feet
Exhaust Flow	158,500 acfm	158,500acfm
	67,700 dscfm @ 10% O <sub>2</sub>	67,700 dscfm @ 10% O <sub>2</sub>
Exhaust Temperature	466° F	466° F

- a. This exhaust stream includes a new mechanical dust collector and the existing ESP and stack originally constructed with the No. 4 Combination Boiler.
- b. This exhaust stream includes the mechanical dust collector, ESP and stack originally constructed with the No. 5 Power Boiler.

[Rules 62-4.070(3), 62-210.200(PTE) and 62-212.400(BACT), F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. No. 4 Combination Boiler (EU-016)

8. **Authorized Fuels:** After completing Phase 1 of the modifications, the No. 4 Combination Boiler is authorized to fire the following fuels: bark/wood, No. 6 residual fuel oil with a maximum sulfur content of 2.35% by weight, and natural gas (startup fuel). On-specification used oil generated on site and meeting the fuel sulfur specification may be fired with No. 6 fuel oil. See Appendix G for conditions specific to on-specification used oil. Once construction is complete on Phase 2 (addition of natural gas), the permittee is prohibited from firing fuel oil and on-specification used oil. *{Permitting Note: As described in the project description in Section 1 of this permit, the No. 4 Combination Boiler was previously permitted to serve as a control device to combust NCG, SOG and DNCG.}* [Rules 62-210.200(PTE) and 62-212.400(PSD), F.A.C.; Permit Nos. 1070005-017-AC and 1070005-024-AC]
9. **Permitted Capacity:** After completing the modifications, the No. 4 Combination Boiler is authorized to operate at the following maximum heat input rates.

Fuel Source	Maximum Heat Input Rate
Bark/Wood (alone or combined with other fuels)	564.0 MMBtu/hr, 24-hr average <sup>a</sup>
Residual Fuel Oil	418.6 MMBtu/hr, 24-hr average <sup>b</sup>
Natural Gas	427.0 MMBtu/hr, 24-hr average <sup>c</sup>

<sup>a</sup> Based of 59.4 tons per hour of bark/wood with an average heating value of 4750 Btu/lb on an as-fired basis (wet).

<sup>b</sup> Based of 2791 gallons per hour No. 6 fuel oil with an average heating value of 150,000 Btu/gallon.

<sup>c</sup> Based of 427,000 cubic feet (cf) per hour of natural gas with an average heating value of 1000 Btu/cf.

[Rule 62-210.200(PTE), F.A.C.; Permit Nos. 1070005-024-AC and 1070005-028-AC; and Application No. 1070005-045-AC (PSD-FL-393)]

10. **Operational Restrictions:** The hours of operation of No. 4 Combination Boiler are not limited (8760 hours per year). However, operation shall not exceed the following restrictions.
- No more than 5,100,000 gallons of No. 6 fuel oil shall be fired during any consecutive 12-month rolling total. *{Permitting Note: This requirement will become obsolete after completion of the Phase 2 work and the cessation of oil firing.}*
  - The total heat input rate shall not exceed 4,042,127 MMBtu during any consecutive 12-month rolling total.

The permittee shall keep records on a monthly basis to ensure compliance with these operational restrictions. [Rules 62-210.200(PTE) and 62-212.400(PSD), F.A.C.; Permit No. PSD-FL-380; and Application No. 1070005-045-AC (PSD-FL-393)]

#### EMISSIONS STANDARDS

*{Permitting Note: The following standards apply to the No. 4 Combination Boiler (EU-016). Unless otherwise specified for standards demonstrated by stack test, the actual emission rate shall be the arithmetic average of three separate test runs. See Rules 62-297.310(1), (2) and (3), F.A.C.}*

11. **CO Emissions:** When firing any combination of authorized fuel, CO emissions shall not exceed 0.50 lb/MMBtu and 282.0 lb/hour based on a 30-day rolling CEMS average. This standard excludes authorized periods of startup, shutdown and malfunction. [Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. No. 4 Combination Boiler (EU-016)

#### 12. NO<sub>x</sub> Emissions:

- a. *Bark/Wood:* During the initial interim period, NO<sub>x</sub> emissions shall not exceed 0.28 lb/MMBtu and 157.9 lb/hour based on a 30-day rolling CEMS average. The initial interim period is defined as the first consecutive 18 months after completing work (including a 90 calendar day shakedown period) on the bark/wood fuel delivery system and the OFA system. During the initial interim period, the permittee shall operate the boiler and control system to minimize NO<sub>x</sub> emissions to the extent practicable. Thereafter, one of the following standards shall apply. Day 1 of the first 30-day rolling average compliance period for the new standard is the first day after the end of the 18-month initial interim period.
- (1) NO<sub>x</sub> emissions shall not exceed 0.24 lb/MMBtu and 135.4 lb/hour based on a 30-day rolling CEMS average. This standard applies following the initial interim period defined above in Condition 12.a based on satisfactory reductions achieved by the installed OFA system.
  - (2) If unable to achieve the NO<sub>x</sub> emissions standard specified above in Condition 12.a(1) based solely on the installed OFA system, the permittee shall complete the requirements in paragraphs (a) and (b) before the end of the initial interim period defined above.
    - (a) The permittee shall provide notification that an additional NO<sub>x</sub> control system will be installed. The notification shall include the preliminary design details of the selected control system and a schedule for installation and commencement of operation.
    - (b) The permittee shall install, operate and maintain a NO<sub>x</sub> control system (e.g., selective non-catalytic reduction system) to comply with a NO<sub>x</sub> emissions standard of 0.17 lb/MMBtu and 95.9 lb/hour based on a 30-day rolling CEMS average.
- b. *Fuel Oil:* When firing only No. 6 fuel oil, NO<sub>x</sub> emissions shall not exceed 0.27 lb/MMBtu and 113.0 lb/hour based on a 30-day rolling CEMS average.
- c. *Natural Gas:* When firing only natural gas, NO<sub>x</sub> emissions shall not exceed 0.15 lb/MMBtu and 64.1 lb/hour based on a 30-day rolling CEMS average.
- d. *Combinations of Fuels:* When firing a combination of fuels, the NO<sub>x</sub> emissions standard shall be prorated based on the heat input rate from each fuel actually fired.

These standards exclude authorized periods of startup, shutdown and malfunction. [Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]

#### 13. PM Emissions:

- a. *PM Emissions:* When firing any authorized fuel or combination thereof, PM emissions shall not exceed 0.040 lb/MMBtu and 22.6 lb/hour as determined by tests conducted in accordance with EPA Method 5 or 29. This BACT standard was based on the vendor guarantee for the proposed equipment modifications. The Department believes that such equipment modifications will achieve a much lower emissions rate. Therefore:
1. The permittee shall operate the PM control equipment to minimize emissions.
  2. After completing the proposed work and as specified in this permit, the permittee shall conduct at least one stack test during each of the first four calendar quarters that demonstrate compliance with the PM BACT emissions standards.
  3. The permittee shall submit reports summarizing the results for all quarterly stack tests. Each report shall also summarize operation of the PM controls.

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. No. 4 Combination Boiler (EU-016)

4. The permittee shall submit an application to modify this permit by reducing the PM BACT emissions standard based on all quarterly stack tests demonstrating compliance with the current standard. The application shall detail the modifications made to the PM controls, provide the final design details, summarize the equipment capabilities and propose new PM BACT emissions standards. As deemed necessary by the Department, the permit will be modified to reduce the PM BACT emissions standards based on the application and all other relevant information available to the Department. The revised PM BACT emissions standards will be no lower than 0.030 lb/MMBtu and 16.9 lb/hour.

b. *Opacity*: When firing any authorized fuel or combination thereof, visible emissions shall not exceed 20% opacity based on a 6-minute average, except for one 6-minute period per hour that shall not exceed 27% opacity, as determined by COMS and/or EPA Method 9. This standard applies to each stack.

*{Permitting Note: Compliance with these standards ensures compliance with the applicable standards of Rule 62-296.410(1)(b), F.A.C. for Carbonaceous Fuel Burning Equipment.}* [Rules 62-212.400(BACT) and 62-296.410, F.A.C.]

14. VOC Emissions: When firing any authorized fuel or combination thereof, VOC emissions shall not exceed 0.02 lb/MMBtu and 11.3 lb/hour as determined by EPA Method 25A stack testing. Initial compliance shall be demonstrated while firing bark/wood at permitted capacity. Thereafter, compliance shall be assumed if the unit remains in compliance with the CO standards demonstrated by CEMS. [Rule 62-212.400(BACT), F.A.C.]

### CONTINUOUS EMISSIONS COMPLIANCE MONITORING

15. Compliance by CEMS: Compliance with the CO and NO<sub>x</sub> standards shall be demonstrated with data collected from the CEMS required by this permit. The permittee shall properly install, calibrate, operate and maintain CEMS to measure and record CO and NO<sub>x</sub> emissions in the terms of each applicable standard. The systems shall include continuous monitors to determine the flue gas oxygen or carbon dioxide content and exhaust flow rate. Each CEMS shall be installed such that representative measurements of emissions or process parameters from the facility are obtained. The permittee shall comply with the conditions in Appendix F (Standard Continuous Monitoring Requirements) of this permit. Each CEMS shall be installed, certified, fully operational and collecting compliance data within 90 days of achieving the new permitted capacity on bark/wood, but no later than 180 days after completing the work on the bark/wood fuel delivery system and the OFA system. If emissions are representative, the permittee may monitor only one of the two stacks to determine CO and NO<sub>x</sub> emissions based on an approved CEMS Operation Plan as required in Appendix F of this permit. [Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]

16. Compliance by COMS: Compliance with the opacity standards shall be demonstrated with data collected from the COMS required by this permit. The permittee shall properly install, calibrate, operate and maintain a COMS that achieves the requirements of Performance Specification 1 (PS-1) in Appendix B of 40 CFR 60 to measure and record opacity in the terms of the applicable standards. The system shall be installed such that representative measurements of opacity are obtained from each stack. Each COMS shall be installed, certified, fully operational and collecting compliance data within 90 days of achieving the new permitted capacity on bark/wood, but no later than 180 days after completing the work on the bark/wood fuel delivery system, PM controls and OFA system. [Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]

### COMPLIANCE TESTING REQUIREMENTS

17. Standard Testing Requirements: All required emissions tests shall be conducted in accordance with the

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. No. 4 Combination Boiler (EU-016)

requirements specified in Appendix D (Standard Testing Requirements) of this permit. [Rule 62-297.310, F.A.C.]

18. **Test Notification:** The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. [Rule 62-297.310(7)(a)9, F.A.C.]
19. **Test Methods:** Compliance tests shall be conducted in accordance with the following EPA Reference Methods as described in Appendix A of 40 CFR 60, and adopted by reference in Rule 62-204.800, F.A.C.

EPA Method	Description of Method and Comments
1-4	Methods for Determining Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content: These methods shall be performed as necessary to support other methods.
5 or 29	Methods for Determining Particulate Matter Emissions
7E	Method for Determining Nitrogen Oxides Emissions
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Method for Determining Carbon Monoxide Emissions (Instrumental): The method shall be based on a continuous sampling train.
18	Method for Measuring Gaseous Organic Compound Emissions by Gas Chromatography EPA Method 18 may be conducted simultaneously with EPA Method 25A to deduct non-regulated methane emissions from regulated VOC emissions.
25A	Method for Determining Total Gaseous Organic Concentration using a Flame Ionization Analyzer

No other methods may be used unless prior written approval is received from the Department. [Rules 62-212.400(BACT), 62-204.800 and 62-297.310, F.A.C.; and Appendix A of 40 CFR 60]

20. **Compliance Tests:** In accordance with the following requirements, the permittee shall have stack tests conducted to demonstrate compliance with the emissions standards specified in this permit.
- Initial Tests:** The permittee shall conduct initial tests to demonstrate compliance with the emissions standards for opacity, PM and VOC. After completing modifications of the bark/wood feeder, PM controls and OFA systems, the permittee shall conduct initial tests within 90 calendar days of achieving permitted capacity, but no later than 180 calendar days after initial startup. After satisfactorily demonstrating compliance with the PM emissions standards in this permit, the permittee shall also conduct at least one test for PM emissions during each of the next three subsequent calendar quarters that demonstrates compliance with the PM emissions standards in this permit.
  - Annual Tests:** During each federal fiscal year (October 1<sup>st</sup> to September 30<sup>th</sup>), the permittee shall conduct tests to determine compliance with the emissions standards for shall be conducted for opacity, PM and VOC. If initial tests show satisfactory compliance with the VOC standards, compliance with the CO standards will serve as a surrogate for demonstrating compliance with the VOC standards and annual VOC tests will not be required unless requested by the Department as a special test pursuant to Rule 62-297.310(7)(b), F.A.C.
  - Test Fuel:** All tests shall be conducted when firing only bark/wood at permitted capacity.
  - Simultaneous PM Stack Testing:** Exhaust from the No. 4 Combination Boiler is split into two streams with separate PM control devices. Therefore, the permittee shall conduct simultaneous stack tests on the two stacks to determine compliance with the PM emissions standard. Each performance test shall consist of three runs. [Rules 62-4.070(3) and 62-221.400(BACT), F.A.C.]



## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. No. 4 Combination Boiler (EU-016)

- e. *Operational Data for Tests:* For each test run, the permittee shall monitor and record the following information: fuel feed rate; the heat input rate; the secondary power input to each ESP; the flue gas oxygen or carbon dioxide content (%); exhaust flow rates; the number of ESP fields in operation; the rapping frequency; the COMS opacity data; comments on the ash removal and handling system; and CO and NO<sub>x</sub> CEMS data (when available).

Compliance with the CO and NO<sub>x</sub> standards shall be demonstrated by data collected from the required CEMS. [Rules 62-212.400(BACT) and 62-297.310, F.A.C.]

### EXCESS EMISSIONS

21. Excess Emissions: Pursuant to Rules 62-210.700(5) and 62-212.400, F.A.C., the Department establishes the following conditions related to excess emissions.

- a. Compliance with the CO and NO<sub>x</sub> standards are determined by data collected with required CEMS excluding authorized periods of startup, shutdown and malfunction. The permittee may exclude CEMS data collected during the following authorized periods as limited by this condition.
1. *Startup:* No more than eight hours of CEMS data may be excluded for any startup.
  2. *Shutdown:* No more than eight hours of CEMS data may be excluded for any shutdown.
  3. *Malfunction:* No more than two hours of CEMS data in any 24-hour period may be excluded for malfunction.

Appendix F of this permit defines the terms "startup, shutdown and malfunction" and specifies other continuous monitoring requirements.

- b. The No. 4 Combination Boiler shall comply with the opacity standards once the ESP is placed in service during a startup in accordance with the manufacturer's recommendations. If best operational practices are used to minimize the magnitude and duration of emissions, excess opacity resulting from malfunction is allowed for no more than two hours in any 24-hour period.

The above requirements are established in lieu of the provisions in Rule 62-210.700(1), F.A.C. [Rules 62-210.700 and 62-212.400(BACT), F.A.C.]

### MONITORING REQUIREMENTS

22. Fuel Monitoring: The permittee shall continuously monitor the following:

- a. *Bark/Wood:* The permittee shall monitor and record the amount of bark/wood (tons) fired and the equivalent heat input rate (MMBtu) to demonstrate compliance with the conditions of this permit.
- b. *Fuel Oil:* The permittee shall install, operate and maintain an oil flow monitoring system to demonstrate compliance with the conditions of this permit.
- c. *On-Specification Used Oil:* The permittee shall monitor and record the amount of on-specification used oil fired. The permittee shall comply with the requirements in Appendix G (On-Specification Used Oil Requirements) of this permit.
- d. *Natural Gas:* The permittee shall install, operate and maintain a natural gas flow monitoring system to demonstrate compliance with the conditions of this permit.
- e. *Heat Input Rate:* The permittee shall record the total equivalent heat input rate (MMBtu) to demonstrate compliance with the conditions of this permit.

[Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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#### A. No. 4 Combination Boiler (EU-016)

23. Fuel Oil Sulfur Records: The sulfur content of the No. 6 fuel oil used by the facility for all of the fuel sources shall not exceed 2.35% by weight based on a 3-barge rolling average. A record of analysis of each fuel oil shipment received shall be maintained and an annual report submitted. In order to demonstrate compliance with this condition, the permittee shall calculate and maintain a log of the rolling 3-barge average sulfur content (i.e., the average of three consecutive barge deliveries based on the certified fuel oil analysis receipt). Fuel oil analysis shall be conducted using ASTM Methods D-129, D-1552, D-2622, D-4294, or equivalent methods approved by the Department. The Annual Report is due by April 1st for the previous year. [Rules 62-212.400(BACT), 62-4.070(3) and 62-297.440, F.A.C.]
24. Steam Records: The permittee shall continuously monitor and record the following steam parameters: steam production rate (lb/hour), steam pressure (psig) and steam temperature (° F). [Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]

#### RECORDS AND REPORTS

25. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Standard Testing Requirements) of this permit. For each test run, the report shall also indicate the amount of fuel fired and the equivalent heat input rate. [Rules 62-4.070(3) and 62-297.310(8), F.A.C.]
26. Semiannual Monitoring Reports: The permittee shall submit a written report to the Compliance Authority summarizing the following for each calendar quarter: CO and NO<sub>x</sub> emissions; CEMS monitor availability; bark/wood fuel fired; gallons of fuel oil fired; cubic feet of natural gas fired; and total hours of operation. The reports shall identify any exceedance of an emissions or performance limitation. The reports are due within 30 days following the second and fourth calendar quarters. [Rules 62-4.070(3) and 62-213.440(1)(b)3., F.A.C.; and 1070005-045-AC/PSD-FL-393]

## SECTION 4. APPENDICES

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**SECTION 4. APPENDIX A**  
**CITATION FORMATS AND GLOSSARY OF COMMON TERMS**

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**CITATION FORMATS**

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

**Old Permit Numbers**

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit  
“AO” identifies the permit as an Air Operation Permit  
“123456” identifies the specific permit project number

**New Permit Numbers**

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located  
“2222” represents the specific facility ID number for that county  
“001” identifies the specific permit project number  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor source federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a major Title V air operation permit

**PSD Permit Numbers**

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality  
“FL” means that the permit was issued by the State of Florida  
“317” identifies the specific permit project number

**Florida Administrative Code (F.A.C.)**

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

**Code of Federal Regulations (CFR)**

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

**GLOSSARY OF COMMON TERMS**

° F: degrees Fahrenheit

acfm: actual cubic feet per minute

ARMS: Air Resource Management System  
(Department’s database)

BACT: best available control technology

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

CO: carbon monoxide

COMS: continuous opacity monitoring system

SECTION 4. APPENDIX A

CITATION FORMATS AND GLOSSARY OF COMMON TERMS

<b>DEP:</b> Department of Environmental Protection	<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants
<b>Department:</b> Department of Environmental Protection	<b>NO<sub>x</sub>:</b> nitrogen oxides
<b>dscfm:</b> dry standard cubic feet per minute	<b>NSPS:</b> New Source Performance Standards
<b>EPA:</b> Environmental Protection Agency	<b>O&amp;M:</b> operation and maintenance
<b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter)	<b>O<sub>2</sub>:</b> oxygen
<b>EU:</b> emissions unit	<b>Pb:</b> lead
<b>F.A.C.:</b> Florida Administrative Code	<b>PM:</b> particulate matter
<b>F.D.:</b> forced draft	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>F.S.:</b> Florida Statutes	<b>PSD:</b> prevention of significant deterioration
<b>FGR:</b> flue gas recirculation	<b>psi:</b> pounds per square inch
<b>Fl:</b> fluoride	<b>PTE:</b> potential to emit
<b>ft<sup>2</sup>:</b> square feet	<b>RACT:</b> reasonably available control technology
<b>ft<sup>3</sup>:</b> cubic feet	<b>RATA:</b> relative accuracy test audit
<b>gpm:</b> gallons per minute	<b>SAM:</b> sulfuric acid mist
<b>gr:</b> grains	<b>scf:</b> standard cubic feet
<b>HAP:</b> hazardous air pollutant	<b>scfm:</b> standard cubic feet per minute
<b>Hg:</b> mercury	<b>SIC:</b> standard industrial classification code
<b>I.D.:</b> induced draft	<b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>ID:</b> identification	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>kPa:</b> kilopascals	<b>TPH:</b> tons per hour
<b>lb:</b> pound	<b>TPY:</b> tons per year
<b>MACT:</b> maximum achievable technology	<b>UTM:</b> Universal Transverse Mercator coordinate system
<b>MMBtu:</b> million British thermal units	<b>VE:</b> visible emissions
<b>MSDS:</b> material safety data sheets	<b>VOC:</b> volatile organic compounds
<b>MW:</b> megawatt	

**SECTION 4. APPENDIX B**  
**GENERAL CONDITIONS**

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The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy and records that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of non-compliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence

**SECTION 4. APPENDIX B**  
**GENERAL CONDITIONS**

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shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (X);
  - b. Determination of Prevention of Significant Deterioration (X); and
  - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - 1) The date, exact place, and time of sampling or measurements;
    - 2) The person responsible for performing the sampling or measurements;
    - 3) The dates analyses were performed;
    - 4) The person responsible for performing the analyses;
    - 5) The analytical techniques or methods used; and
    - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SECTION 4. APPENDIX C**  
**COMMON CONDITIONS**

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Unless otherwise specified in the permit, the following conditions apply.

**EMISSIONS AND CONTROLS**

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

*{Permitting Note: Rule 62-210-700(Excess Emissions), F.A.C. cannot vary or supersede any federal provision of the New Source Performance Standards (NSPS) or the National Emission Standards for Hazardous Air Pollutants (NESHAP) programs.}*

**RECORDS AND REPORTS**

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(3), F.A.C.]



**SECTION 4. APPENDIX D**  
**STANDARD TESTING REQUIREMENTS**

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units at the facility.

**COMPLIANCE TESTING REQUIREMENTS**

1. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
2. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rule 62-297.310(2), F.A.C.]
3. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
4. Applicable Test Procedures
  - a. *Required Sampling Time.*
    - (1) Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
    - (2) Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
      - (a) For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
      - (b) The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
      - (c) The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
  - b. *Minimum Sample Volume.* Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.

**SECTION 4. APPENDIX D**  
**STANDARD TESTING REQUIREMENTS**

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- c. *Calibration of Sampling Equipment.* Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.
- d. *Allowed Modification to EPA Method 5.* When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

5. Determination of Process Variables

- a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

6. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must also comply with all applicable Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

- a. *Permanent Test Facilities.* The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.
- b. *Temporary Test Facilities.* The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.
- c. *Sampling Ports.*
  - (1) All sampling ports shall have a minimum inside diameter of 3 inches.
  - (2) The ports shall be capable of being sealed when not in use.
  - (3) The sampling ports shall 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.
  - (4) For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall 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, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.
  - (5) On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.

**SECTION 4. APPENDIX D**  
**STANDARD TESTING REQUIREMENTS**

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d. *Work Platforms.*

- (1) Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.
- (2) On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.
- (3) On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.
- (4) All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toe board, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall 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.

e. *Access to Work Platform.*

- (1) Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.
- (2) Walkways over free-fall areas shall be equipped with safety rails and toe boards.

f. *Electrical Power.*

- (1) A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.
- (2) If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

g. *Sampling Equipment Support.*

- (1) A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.
  - (a) The bracket shall be a standard 3 inch × 3 inch × one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.
  - (b) A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.
  - (c) The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall 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 shall 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 shall be attached to it to bring the free end of the chain to within safe reach from the platform.
- (2) A complete monorail or dual rail arrangement may be substituted for the eyebolt and bracket.
- (3) When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

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

7. Frequency of Compliance Tests: The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

a. *General Compliance Testing.*

1. The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.

**SECTION 4. APPENDIX D**  
**STANDARD TESTING REQUIREMENTS**

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2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.
  3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to sub-subparagraph 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
    - (a) Did not operate; or
    - (b) In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours,
  4. During each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
    - (a) Visible emissions, if there is an applicable standard;
    - (b) Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
    - (c) Each NESHAP pollutant, if there is an applicable emission standard.
  5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.
  6. For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup.
  7. For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to paragraph 62-296.405(2)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup.
  8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
  9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
  10. An annual compliance test conducted for visible emissions shall not be required for units exempted from air permitting pursuant to subsection 62-210.300(3), F.A.C.; units determined to be insignificant pursuant to subparagraph 62-213.300(2)(a)1., F.A.C., or paragraph 62-213.430(6)(b), F.A.C.; or units permitted under the General Permit provisions in paragraph 62-210.300(4)(a) or Rule 62-213.300, F.A.C., unless the general permit specifically requires such testing.
- b. *Special Compliance Tests.* When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and

**SECTION 4. APPENDIX D**  
**STANDARD TESTING REQUIREMENTS**

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quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

- c. *Waiver of Compliance Test Requirements.* If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of paragraph 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.]

**RECORDS AND REPORTS**

**8. Test Reports:**

- a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- c. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information.
  1. The type, location, and designation of the emissions unit tested.
  2. The facility at which the emissions unit is located.
  3. The owner or operator of the emissions unit.
  4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
  5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
  6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
  7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
  8. The date, starting time and duration of each sampling run.
  9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
  10. The number of points sampled and configuration and location of the sampling plane.
  11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
  12. The type, manufacturer and configuration of the sampling equipment used.
  13. Data related to the required calibration of the test equipment.
  14. Data on the identification, processing and weights of all filters used.
  15. Data on the types and amounts of any chemical solutions used.

**SECTION 4. APPENDIX D**  
**STANDARD TESTING REQUIREMENTS**

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16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

**SECTION 4. APPENDIX E**

**SUMMARY OF BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATIONS**

**PROJECT DESCRIPTION**

Georgia-Pacific Consumer Operations LLC operates an existing paper and pulp mill in Palatka using the Kraft sulfate process. In the Kraft process, the digesting liquor (white liquor) is a solution of sodium hydroxide and sodium sulfide that is mixed with wood chips and cooked under pressure. The spent liquor, known as weak black liquor, is concentrated and sodium sulfate is added to make up for chemical losses. The black liquor solids (BLS) are burned in the recovery furnace to produce a smelt of sodium carbonate and sodium sulfide. The smelt is dissolved in water to form green liquor to which quicklime (calcium oxide) is added to convert the sodium carbonate back to sodium hydroxide, which reconstitutes the cooking liquor. The spent lime cake (calcium carbonate) is recalcined in a rotary lime kiln to produce quicklime, which is used to convert the green liquor to cooking liquor. Other steam and energy needs are met by the power boilers, which burn a variety of fuels including bark/wood, residual fuel oil and natural gas.

The No. 4 Combination Boiler will be modified in two phases. The initial phase includes the following changes: upgrades to the bark/wood delivery system with new air swept bark conveyors and feed bin to increase bark/wood firing rate; increase the maximum hourly heat input rate; installation of a new overfire air (OFA) system; installation of a new mechanical collector to replace the existing multiclone pre-cleaner; installation of a bottom ash handling system; modification of ductwork to use the existing multiclone/electrostatic precipitator (ESP)/stack from the No. 5 Power Boiler (which has been converted to natural gas) to serve the No. 4 Combination Boiler in parallel with the existing multiclone/ESP/stack; and modification of ductwork to introduce the dilute non-condensable gases into the new OFA system. The second phase will convert the supplemental residual oil firing system for the No. 4 Combination Boiler to natural gas and permanently discontinue use of residual oil. Implementing this phase is dependent on obtaining additional pipeline capacity from the natural gas vendor, the Florida Gas Transmission Company, which may take approximately 2 to 3 years depending on the siting process for new pipelines as well as construction.

Based on a netting analysis including other contemporaneous projects, this project is subject to preconstruction review for the prevention of significant deterioration (PSD) of air quality for emissions of carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), particulate matter with an aerodynamic mean diameter equal to or less than 10 microns (PM<sub>10</sub>) and volatile organic compounds (VOC) in accordance with Rule 62-212.400, F.A.C. Contemporaneous emissions decreases allowed the project to avoid PSD preconstruction review for the emissions of sulfur dioxide (SO<sub>2</sub>), sulfuric acid mist (SAM) and total reduced sulfur compounds. PM emissions serve as a surrogate for regulating PM<sub>10</sub> emissions. Conversion from supplemental fuel oil to natural gas will result in a potential reduction of more than 3800 tons/year of SO<sub>2</sub> and 163 tons/year of SAM.

**SUMMARY OF BACT DETERMINATIONS**

The following table summarizes the BACT standards for this project.

<b>Pollutant</b>	<b>BACT Standards</b>	<b>Control Technology</b>	<b>Monitoring</b>
PM <sup>d</sup> (all fuels)	≤ 0.040 lb/MMBtu and 22.6 lb/hour	dual multiclone-ESP combinations in parallel and OFA system	initial quarterly tests and annual tests EPA Method 5 or 29, 3-test run average
VE (all fuels)	≤ 20% opacity based on 6-minute averages, except for one 6-minute period per hour hour ≤ 27% opacity		COMS and/or EPA Method 9
NO <sub>x</sub> Bark/Wood Oil Gas	≤ 0.24 lb/MMBtu and 135.4 lb/hour <sup>c</sup> ≤ 0.27 lb/MMBtu and 113.0 lb/hour ≤ 0.15 lb/MMBtu and 64.1 lb/hour	improved OFA system, combustion controls, low-nitrogen fuels and LNB system for gas	30-day rolling CEMS average <sup>a</sup> (standard prorated based on heat input rate from each fuel)
CO (all fuels)	0.50 lb/MMBtu and 282.0 lb/hour	improved OFA system and combustion controls	30-day rolling CEMS average <sup>a</sup>
VOC (all fuels)	0.02 lb/MMBtu and 11.3 lb/hour	improved OFA system and combustion controls	initial test <sup>b</sup> EPA Method 25A, 3-test run average

- a. The CO and NO<sub>x</sub> standards include all periods of operation except startup, shutdown and malfunction.
- b. EPA Method 18 may be conducted simultaneously with EPA Method 25A to deduct methane emissions. If initial VOC tests show satisfactory compliance, compliance with the CO standards will serve as a surrogate for compliance.

SECTION 4. APPENDIX E

SUMMARY OF BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATIONS

- c. The permit authorizes an initial interim NO<sub>x</sub> standard of 0.28 lb/MMBtu for the first consecutive 18 months after completing work (including a 90 calendar day shakedown period) of the new systems on the bark/wood fuel delivery system and the OFA system. The interim period provides time to gather emissions data and adjust the OFA system to comply with the NO<sub>x</sub> BACT standard of 0.24 lb/MMBtu. If unable to comply with the NO<sub>x</sub> BACT standard of 0.24 lb/MMBtu based on the new OFA system, the permit requires installation of additional NO<sub>x</sub> control equipment (e.g., selective non-catalytic reduction system, etc.) to comply with a standard of 0.17 lb/MMBtu. The new control equipment must be installed and operating before the end of the initial interim period.
- d. The permit includes a provision to reduce the PM BACT standard (no lower than 0.030 lb/MMBtu and 16.9 lb/hour) based on the initial four quarterly stack tests that demonstrated compliance with the initial standard and all other relevant available information.



**SECTION 4. APPENDIX F**  
**STANDARD CONTINUOUS MONITORING REQUIREMENTS**

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The No. 4 Combination Boiler (EU-016) is subject to the following requirements for the new continuous emissions monitoring systems (CEMS). The permit requires compliance with the CO and NO<sub>x</sub> emissions standards to be demonstrated continuously with data collected from a certified CEMS.

**CEMS OPERATION PLAN**

1. **CEMS Operation Plan:** The permittee shall create and implement a plan for the proper installation, calibration, maintenance, and operation of each CEMS required by this permit. The plan shall also address the location of a single CO and NO<sub>x</sub> CEMS that would provide representative emissions from both exhaust stacks. The permittee shall submit the CEMS Operation Plan to the Bureau of Air Monitoring and Mobile Sources for approval prior to CEMS installation. The CEMS Operation Plan shall become effective 60 days after submittal or upon its approval. If the CEMS Operation Plan is not approved, the permittee shall submit a new or revised plan for approval. *{Permitting Note: The Department maintains both guidelines for developing a CEMS Operation Plan and example language that can be used as the basis for the facility-wide plan required by this permit. Contact the Emissions Monitoring Section of the Bureau of Air Monitoring and Mobile Sources at 850/488-0114.}* [Rule 62-4.070(3), F.A.C.]

**MONITORS, PERFORMANCE SPECIFICATIONS AND QUALITY ASSURANCE**

2. **Installation:** All CEMS shall be installed such that representative measurements of emissions or process parameters from the facility are obtained. The owner or operator shall locate the CEMS by following the procedures contained in the applicable performance specification in Appendix B of 40 CFR 60. Exhaust gas from the No. 4 Combination Boiler is split into two separate streams with separate PM control devices. Since CO and NO<sub>x</sub> are gases and the standards are based on the heat input rate of the fuel being fired (lb/MMBtu), the permittee may install the CEMS on one stack as long as emissions are representative from the emissions unit.
3. **Span Values and Dual Range Monitors:** The permittee shall set appropriate span values for the CEMS based on the emissions standards and range of operation. If necessary, the permittee shall install dual range monitors in accordance with the CEMS Operation Plan. [Rule 62-4.070(3), F.A.C.]
4. **Diluent Monitor:** If required by permit to correct the CEMS output to the oxygen concentrations specified in the applicable emissions standard, the permittee shall either install an oxygen (O<sub>2</sub>) monitor or a carbon dioxide (CO<sub>2</sub>) monitor and use an appropriate F-Factor computational approach. [Rule 62-4.070(3), F.A.C.]
5. **Moisture Correction:** If necessary, the permittee shall install a system to determine the moisture content of the exhaust gas and develop an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). [Rule 62-4.070(3), F.A.C.]
6. **Continuous Flow Monitor:** For compliance with mass emission flow rate standards, the permittee shall install a continuous flow monitor to determine the stack exhaust flow rate. The flow monitor shall be certified pursuant to 40 CFR Part 60, Appendix B, Performance Specification 6. Alternatively, the permittee may install a fuel flow monitor and use an appropriate F-Factor computational approach to calculate the stack exhaust flow rate. *{Permitting Note: The CEMS Operation Plan will contain additional details and procedures for CEMS installation.}* [Rule 62-4.070(3), F.A.C.]
7. **Performance Specifications:** The permittee shall evaluate the “acceptability” of each CEMS by conducting the appropriate performance specification. CEMS determined to be “unacceptable” shall not be considered “installed” for purposes of meeting the timelines of this permit. For CO monitors, the permittee shall conduct Performance Specification 4 of 40 CFR Part 60, Appendix B. For NO<sub>x</sub> monitors, the permittee shall conduct Performance Specification 2 of 40 CFR Part 60, Appendix B. [Rule 62-4.070(3), F.A.C.]
8. **Quality Assurance:** The permittee shall follow the quality assurance procedures of 40 CFR Part 60, Appendix F. For CO, the required relative accuracy test audit (RATA) tests shall be performed using EPA Method 10 in Appendix A of 40 CFR Part 60. For NO<sub>x</sub>, the RATA tests shall be performed using EPA Method 7E in Appendix A of 40 CFR Part 60. [Rule 62-4.070(3), F.A.C.]

**CALCULATION APPROACH FOR SIP COMPLIANCE**

9. **CEMS for Compliance:** Once adherence to the applicable performance specification for each CEMS is demonstrated,

**SECTION 4. APPENDIX F**  
**STANDARD CONTINUOUS MONITORING REQUIREMENTS**

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the permittee shall use the CEMS to demonstrate compliance with the applicable emission standards as specified by this permit. [Rules 62-212.400(PSD-BACT) and 62-4.070(3), F.A.C.]

10. **CEMS Data:** Each CEMS shall monitor and record emissions during all operations and whenever emissions are being generated, including during episodes of startups, shutdowns, and malfunctions. All data shall be used, except for invalid measurements taken during monitor system breakdowns, repairs, calibration checks, zero adjustments, and span adjustments. [Rule 62-4.070(3), F.A.C.]
11. **Operating Hours and Operating Days:** For purposes of this Appendix, the following definitions shall apply. An hour is the 60-minute period beginning at the top of each hour. Any hour during which an emissions unit is in operation for more than 15 minutes is an operating hour for that emission unit. A day is the 24-hour period from midnight to midnight. Any day with at least one operating hour for an emissions unit is an operating day for that emission unit. [Rule 62-4.070(3), F.A.C.]
12. **Valid Hourly Averages:** Each CEMS shall be designed and operated to sample, analyze, and record data evenly spaced over the hour at a minimum of one measurement per minute. All valid measurements collected during an hour shall be used to calculate a 1-hour block average that begins at the top of each hour.
  - a. Hours that are not operating hours are not valid hours.
  - b. For each operating hour, the 1-hour block average shall be computed from at least two data points separated by a minimum of 15 minutes. If less than two such data points are available, there is insufficient data, the 1-hour block average is not valid, and the hour is considered as "monitor unavailable."[Rule 62-4.070(3), F.A.C.]
13. **Calculation Approaches:** Compliance with the 30-day rolling CO and NO<sub>x</sub> averages shall be determined after each operating day by calculating and recording the arithmetic average of all valid hourly averages for the previous 30 operating days (compliance period). As specified in the permit, limited amounts of CEMS data collected during startup, shutdown and malfunction may be excluded from the compliance period. [Rules 62-212.400(PSD-BACT) and 62-4.070(3), F.A.C.]
14. **Minimum Valid Hours:** At least one valid hourly average shall be used to calculate the emissions over any averaging period specified by this permit. One valid hourly average shall be sufficient to calculate the emissions over any averaging period. [Rule 62-4.070(3), F.A.C.]

**MONITOR AVAILABILITY**

15. **Monitor Availability:** Monitor availability shall be calculated on a quarterly basis for each emission unit as the number of valid hourly averages obtained by the CEMS, divided by the number of operating hours, times 100%. The monitor availability calculation shall not include periods of time where the monitor was functioning properly, but was unable to collect data while conducting a mandated quality assurance/quality control activity such as calibration error tests, RATA, calibration gas audit, or relative accuracy audits (RAA). Monitor availability for each CEMS shall be 95% or greater in any calendar quarter. Monitor availability shall be reported in the quarterly excess emissions report. In the event 95% availability is not achieved, the permittee shall provide the Department with a report identifying the problems in achieving 95% availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar quarter. Failure to take corrective actions or continued failure to achieve the minimum monitor availability shall be violations of this permit. [Rule 62-4.070(3), F.A.C.]

**EXCESS EMISSIONS**

16. **Definitions:**
  - a. *Excess Emissions* (under the Florida SIP) are defined as emissions of pollutants in excess of those allowed by any applicable air pollution rule of the Department, or by a permit issued pursuant to any such rule or Chapter 62-4, F.A.C. The term applies only to conditions which occur during startup, shutdown, or malfunction.

## SECTION 4. APPENDIX F

### STANDARD CONTINUOUS MONITORING REQUIREMENTS

- b. *Startup* is defined as the commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.
- c. *Shutdown* means the cessation of the operation of an emissions unit for any purpose.
- d. *Malfunction* means any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.

[Rule 62-210.200(Definitions), F.A.C.]

- 17. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. All such preventable emissions shall be included in any compliance determinations based on CEMS data. [Rules 62-210.700(4) and 62-4.070(3), F.A.C.]
- 18. **Data Exclusion for SIP Compliance:** As per the procedures in this condition, limited amounts of CO and NO<sub>x</sub> CEMS emissions data may be excluded from the corresponding compliance demonstration, provided that best operational practices to minimize emissions are adhered to and the duration of data excluded is minimized. See Condition 20 in Subsection 4A of the permit for authorized periods of data exclusion. As provided by the authority in Rule 62-210.700(5), F.A.C., the following conditions replace the provisions in Rule 62-210.700(1), F.A.C.
  - a. *Excess Emissions.* For purposes of SIP-based permit limits, limited amounts of excess emissions data collected during periods of startup, shutdown and malfunction may be excluded from compliance calculations as allowed by the permit standards.
  - b. *Limiting Data Exclusion.* If the compliance calculation using all valid CEMS emission data (as defined in this Appendix) indicates that the emission unit is in compliance, then no CEMS data shall be excluded from the compliance demonstration.
  - c. *Event Driven Exclusion.* The excess emissions must occur due to an underlying event (startup, shutdown or malfunction). If there is no underlying event, then no data may be excluded.
  - d. *Continuous Exclusion.* Data shall be excluded on a continuous basis per event. Data from discontinuous periods shall not be excluded for the same underlying event.
  - e. *Reporting Excluded Data.* These procedures for excluding SIP-based excess emissions from compliance calculations are not necessarily the same procedures used for "excess emissions" as defined by federal rules. Semiannual reports required by this permit shall indicate the duration of data excluded from SIP compliance calculations.

The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision. [Rules 62-212.400(PSD-BACT) and 62-210.700, F.A.C.]

- 19. **Notification Requirements:** The permittee shall notify the Compliance Authority within one working day of discovering any emissions that demonstrate non-compliance for a given averaging period. [Rule 62-4.130, F.A.C.]

### CALCULATING AND REPORTING ANNUAL EMISSIONS

- 20. **CEMS for Calculating Annual Emissions:** As defined by this Appendix, all valid data shall be used when calculating annual emissions.
  - a. Annual emissions shall include data collected during startup, shutdown, and malfunction periods.
  - b. Annual emissions shall include data collected during periods when the emission unit is not operating, but emissions are being generated (for example, firing fuel to warm up a process for some period of time prior to the emission unit's "official" startup).
  - c. Annual emissions shall not include data from periods of time where the monitor was functioning properly, but was unable to collect data while conducting a mandated quality assurance/quality control activity such as

**SECTION 4. APPENDIX F**  
**STANDARD CONTINUOUS MONITORING REQUIREMENTS**

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calibration error tests, RATA, calibration gas audit, or RAA. These periods of time shall be considered “missing data” for purposes of calculating annual emissions.

- d. Annual emissions shall not include data from periods of time when emissions are in excess of the calibrated span of the CEMS. These periods of time shall be considered “missing data” for purposes of calculating annual emissions.

[Rules 62-212.400(PSD) and 62-4.070(3), F.A.C.]

21. Accounting for Missing Data: All valid measurements collected during each hour shall be used to calculate a 1-hour block average that begins at the top of each hour. For each hour, the 1-hour block average shall be computed from at least two data points separated by a minimum of 15 minutes. If less than two such data points are available, the permittee shall account for emissions during that hour using site-specific data to generate a reasonable estimate of the 1-hour block average. [Rule 62-4.070(3), F.A.C.]
22. Emissions Calculation: Annual emissions shall be calculated as the sum of all valid emissions occurring during the year. [Rules 62-212.400(PSD) and 62-4.070(3), F.A.C.]
23. Reporting Annual Emissions: The permittee shall use data from each required CEMS when calculating annual emissions for purposes of computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for purposes of computing emissions pursuant to the reporting requirements of Rules 62-210.370(3) and 62-212.300(1)(e), F.A.C. [Rules 62-212.400(PSD) and 62-4.070(3), F.A.C.]

SECTION 4. APPENDIX G

ON-SPECIFICATION USED OIL REQUIREMENTS

The permittee shall comply with the following requirements for on-specification used oil.

1. Specifications for Used Oil: Only “on-specification” used oil containing a PCB concentration of less than 50 ppm shall be fired at this facility.

a. “On-specification” used oil is defined as used oil that meets the specifications of 40 CFR 279 (Standards for the Management of Used Oil) as listed below.

Constituent/Property	Allowable Level
Arsenic	5 ppm, maximum
Cadmium	2 ppm, maximum
Chromium	10 ppm, maximum
Lead	100 ppm, maximum
Total Halogens	1000 ppm, maximum
Flash point	100° F, minimum

Used oil which fails to comply with any of these specification levels is considered “off-specification” used oil. The firing of off-specification used oil at this facility is prohibited.

b. Used oil containing a PCB concentration of 50 ppm or more shall not be fired at this facility and shall not be blended to meet this requirement.

c. On-specification used oil with a PCB concentration of 2 ppm to less than 50 ppm shall be fired only at normal unit operating temperatures and shall not be fired during periods of startup or shutdown.

d. On-specification used oil with a PCB concentration of 2 ppm or less may be fired at any time.

e. On-specification used oil shall meet the maximum sulfur content specified in the permit.

[40 CFR 279.61]

2. Used Oil Certifications: For each delivery of used oil, the owner or operator shall receive from the marketer a certification that the used oil meets the specifications for “on-specification” used oil and that it contains a PCB concentration of less than 50 ppm. This certification shall also describe the basis for the certification, such as analytical results. Used oil to be fired for energy recovery is presumed to contain quantifiable levels (2 ppm) of PCB unless the marketer obtains analyses (testing) or other information that the used oil fuel does not contain quantifiable levels of PCBs. Note that a claim that used oil does not contain quantifiable levels of PCBs (<2 ppm) must be documented by analysis or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the used oil contains no detectable PCBs. [40 CFR 761.20]

3. Notification to Marketers: Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration of 2 to less than 50 ppm, the owner or operator shall provide each marketer with a one-time written and signed notice certifying that the owner or operator will fire the used oil in a qualified combustion device and must identify the class of combustion device. The notice must state that EPA or a RCRA-delegated state agency has been given a description of the used oil management activities at the facility and that an industrial boiler or furnace will be used to fire the used oil with a PCB concentration of 2 to 49 ppm. The description of the used oil management activities may be submitted to the Administrator, Hazardous Waste Regulation Section, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. [and 40 CFR 761.20(e)]

4. Sampling and Analysis:

a. If the owner or operator does not receive certification from the marketer as described above, the owner or operator shall sample and analyze each batch of used oil to be fired for the following parameters: arsenic, cadmium, chromium, lead, total halogens, flash point, PCBs, and percent sulfur content by weight, ash, and BTU value (BTU per gallon).

**SECTION 4. APPENDIX G**  
**ON-SPECIFICATION USED OIL REQUIREMENTS**

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- b. If the owner or operator receives the required certification from the marketer, the owner or operator shall sample at least one delivery of used oil received each calendar quarter and analyze the sample for arsenic, cadmium, chromium, lead, total halogens, flash point, PCBs, and percent sulfur content by weight, ash, and BTU value (BTU per gallon).
- c. Sampling and analysis shall be performed using approved methods specified in latest edition of EPA Publication SW-846, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.
- d. If the analytical results show that the used oil does not meet the specifications for on-specification used oil, or that it contains a PCB concentration of 50 ppm or greater, the owner or operator shall immediately cease firing the used oil. The owner or operator shall also immediately notify the appropriate Compliance Authority of the analytical results and indicate the proposed means of disposal of the used oil.

[Rule 62-4.070(3), F.A.C.; 40 CFR Parts 279 and 761]

5. Used Oil Recordkeeping Required: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Compliance Authority:
- a. Within 15 days following each calendar month, record the gallons of on-specification used oil received and fired during the previous calendar month and the previous 12 calendar months.
  - b. The name and address of all marketers delivering used oil to the facility.
  - c. Copies of the marketer certifications and any supporting information.
  - d. If claimed, documentation that the used oil contains less than 2 ppm of PCBs, including the name and address of the person making the claim.
  - e. Results of any sampling/analyses conducted.
  - f. A copy of the notice to EPA and a copy of the one-time written notice provided to each marketer.

[Rule 62-4.070(3), F.A.C.; 40 CFR 279.61; and, 40 CFR 761.20(e)]

6. Used Oil Reporting Required: Within 30 days following each calendar quarter, the owner or operator shall submit to the appropriate Compliance Authority, the analytical results and the total amount of on-specification used oil received and fired during the quarter. [Rule 62-4.070(3), F.A.C.; 40 CFR Parts 279 and 761]

**Livingston, Sylvia**

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**From:** Wahoske, Keith [KEITH.WAHOSKE@GAPAC.com]  
**Sent:** Monday, September 29, 2008 12:44 PM  
**To:** Livingston, Sylvia; Curtis, Michael; Aguilar, Mark J.; Galler, Wayne J.  
**Cc:** dave\_buff@golder.com; Kirts, Christopher; Gibson, Victoria; forney.kathleen@epamail.epa.gov; catherine\_collins@fws.gov; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** RE: Georgia-Pacific Consumer Products LLC - Palatka Pulp and Paper Mill; 1070005-045-AC/PSD-FL-393

We are in receipt of your Email

THX

-----Original Message-----

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Monday, September 29, 2008 9:28 AM  
**To:** Wahoske, Keith; Curtis, Michael; Aguilar, Mark J.; Galler, Wayne J.  
**Cc:** dave\_buff@golder.com; Kirts, Christopher; Gibson, Victoria; forney.kathleen@epamail.epa.gov; catherine\_collins@fws.gov; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** Georgia-Pacific Consumer Products LLC - Palatka Pulp and Paper Mill; 1070005-045-AC/PSD-FL-393

**Dear Sir/ Madam:**

**Attached is the official Notice of Final Permit for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".** We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070005.045.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.045.AC.F_pdf.zip)

**Owner/Company Name:** GEORGIA-PACIFIC CONSUMER OPERATIONS LLC  
**Facility Name:** PALATKA PULP and PAPER MILL  
**Project Number:** 1070005-045-AC/PSD-FL-393  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION/ Modification to the No. 4 Combination Boiler  
**Facility County:** PUTNAM

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Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

<<1070005-045-AC.pdf>>

9/29/2008

Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-0771  
sylvia.livingston@dep.state.fl.us

Tracking:	Recipient	Delivery	Read
	✓ Keith.wahoske@gapac.com'		
	✓ Michael.curtis@gapac.com'		
	✓ mjaguila@gapac.com'		
	✓ wjgaller@gapac.com'		
	✓ dave_buff@golder.com'		
	✓ Kirts, Christopher	Delivered: 9/29/2008 10:29 AM	
	✓ Gibson, Victoria	Delivered: 9/29/2008 10:29 AM	Read: 9/29/2008 10:30 AM
	✓ forney.kathleen@epamail.epa.gov'		
	✓ catherine_collins@fws.gov'		
	✓ Koerner, Jeff	Delivered: 9/29/2008 10:29 AM	
	✓ Walker, Elizabeth (AIR)	Delivered: 9/29/2008 10:29 AM	



## Livingston, Sylvania

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**From:** Livingston, Sylvania  
**Sent:** Monday, September 29, 2008 10:28 AM  
**To:** 'keith.wahoske@gapac.com'; 'michael.curtis@gapac.com'; 'mjaguila@gapac.com'; 'wjgaller@gapac.com'  
**Cc:** 'dave\_buff@golder.com'; Kirts, Christopher; Gibson, Victoria; 'forney.kathleen@epamail.epa.gov'; 'catherine\_collins@fws.gov'; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** Georgia-Pacific Consumer Products LLC - Palatka Pulp and Paper Mill; 1070005-045-AC/PSD-FL-393  
**Attachments:** 1070005-045-AC.pdf

**Dear Sir/ Madam:**

**Attached is the official Notice of Final Permit for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).**

**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070005.045.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.045.AC.F_pdf.zip)

**Owner/Company Name:** GEORGIA-PACIFIC CONSUMER OPERATIONS LLC  
**Facility Name:** PALATKA PULP and PAPER MILL  
**Project Number:** 1070005-045-AC/PSD-FL-393  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION/ Modification to the No. 4 Combination Boiler  
**Facility County:** PUTNAM

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<http://www.dep.state.fl.us/air/eproducts/apds/default.asp> .

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.



1070005-045-AC.p  
df (1 MB)

Sylvia Livingston

Message Headers.txt

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by mseive02.rtp.epa.gov (Postfix) with ESMTP id 226C2214012  
for <forney.kathleen@epamail.epa.gov>; Mon, 29 Sep 2008 10:28:45 -0400 (EDT)  
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Priority: normal  
Received: from tlhexsmb4.floridadep.net ([172.20.30.47]) by tlhexsprot2.floridadep.net with Microsoft  
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Content-Class: urn:content-classes:message  
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MIME-Version: 1.0  
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Disposition-Notification-To: "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>  
Subject: Georgia-Pacific Consumer Products LLC - Palatka Pulp and Paper Mill; 1070005-045-AC/PSD-FL-393  
Date: Mon, 29 Sep 2008 10:28:24 -0400  
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X-MS-TNEF-Correlator:  
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1070005-045-AC/PSD-FL-393  
thread-index: AckIP6FK0fbHW/2qSKmERLhtnGJpAA==  
From: "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>  
To: <keith.wahoske@gapac.com>,  
<michael.curtis@gapac.com>,  
<mjaguila@gapac.com>,  
<wjgaller@gapac.com>  
Cc: <dave\_buff@golder.com>,  
"Kirts, Christopher" <Christopher.Kirts@dep.state.fl.us>,  
"Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>,  
<forney.kathleen@epamail.epa.gov>,  
<catherine\_collins@fws.gov>,  
"Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us>,  
"Walker, Elizabeth \(\AIR\) " <Elizabeth.Walker@dep.state.fl.us>  
X-OriginalArrivalTime: 29 Sep 2008 14:28:27.0348 (UTC) FILETIME=[A3391140:01C9223F]

## Livingston, Sylvia

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**From:** Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]  
**Sent:** Monday, September 29, 2008 10:30 AM  
**To:** Livingston, Sylvia  
**Subject:** Successful Mail Delivery Report

**Attachments:** Delivery report; Message Headers



Delivery report.txt  
(506 B)



Message  
Headers.txt (2 KB)

This is the mail system at host mseive02.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<forney.kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250  
OK, sent 48E0E649\_13569\_186737\_10 3CF21442BF