

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

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

Permit Number: AC 62-197417

Expiration Date: May 31, 1993

County: Bay

Latitude/Longitude: 30°03'59"N

83°33'12"W

Project: Sidestream Pulping Process
Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and Title 40 of the Code of Federal Regulations (CFR; July, 1990 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For a modification to the facility by installing equipment, as a sidestream project, to process pulp. The proposed project will not increase plant capacities, water usage, or effluent flow. The project will have potential pollutant emissions of particulate matter and visible emissions. The UTM coordinates of the facility are Zone 17, 256.74 km East and 3328.70 km North.

The Standard Industrial Codes are: 2611-Pulp Mill.

The Standard Classification Codes are:

o Sulfate Kraft Pulping 3-07-001-99 Tons pulp produced
(Sidestream Pulping)

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

Attachments to be Incorporated:

1. Mr. Clifford Henry's cover letter and Application to Construct/Modify Air Pollution Sources, DER Form 17-1.202(1), received May 28, 1991.
2. Technical Evaluation and Preliminary Determination dated August 14, 1991.

PERMITTEE:
TP&GCC

Permit Number: AC 62-197417
Expiration Date: May 31, 1993

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

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.

PERMITTEE:
TP&GCC

Permit Number: AC 62-197417
Expiration Date: May 31, 1993

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:
TP&GCC

Permit Number: AC 62-197417
Expiration Date: May 31, 1993

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. 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 for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

PERMITTEE:
TP&GCC

Permit Number: AC 62-197417
Expiration Date: May 31, 1993

GENERAL CONDITIONS:

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. The sidestream pulping process may operate continuously (i.e., 3760 hrs/yr).
2. The maximum product rate is 2296 lbs/hr of pulp.
3. The sidestream pulping process is subject to the provisions of F.A.C. Rules 17-4.130: Plant Operation-Problems; 17-2.240: Circumvention; and, 17-2.250: Excess Emissions.
4. The sidestream pulping process shall be in compliance with all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and Title 40 of the CFR (July, 1990 version).
5. The sidestream pulping process shall not exceed the following pollutant emission standards/limitations:

Source	Pollutant	Standard/Limitation
o S1	PM	0.65 lb/hr; 2.85 TPY
	PM10	0.26 lb/hr; 1.14 TPY
	VE	less than 20% opacity
o S2	PM	0.48 lb/hr; 2.10 TPY
	PM10	0.19 lb/hr; 0.83 TPY
	VE	less than 20% opacity
o S3	PM	0.70 lb/hr; 3.07 TPY
	PM10	0.28 lb/hr; 1.23 TPY
	VE	less than 20% opacity

Note: 1) Volumetric flow rates are:

- o S1 7150 acfm
- o S2 5300 acfm
- o S3 4420 acfm

- 2) Allowable emission rates include a 20% margin of safety above the vendor's specifications.
- 3) PM₁₀ emissions @ 40% of PM emissions (test data).

PERMITTEE:
TP&GCC

Permit Number: AC 62-197417
Expiration Date: May 31, 1993

SPECIFIC CONDITIONS:

6. Initial and annual compliance tests for PM and VE shall be conducted using the following test methods in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A:

- a) EPA Method 5, Determination of Particulate Emissions from Stationary Sources.
- b) EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources.

7. Initial and annual compliance tests for PM₁₀ shall be conducted using EPA Method 201 or 201A, as published in 55 Federal Register (FR) 14246 (April 17, 1990) and amended in 56 FR 6278 (February 15, 1991).

8. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing in accordance with F.A.C. Rule 17-2.700(3).

9. The equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive pollutant emissions.

10. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2), Objectionable Odors Prohibited.

11. The Department's Northeast District office shall be notified in writing at least 15 days prior to source testing pursuant to F.A.C. Rule 17-2.700(2). Written reports of the tests shall be submitted to the Department's Northeast District office within 45 days of the test completion in accordance with F.A.C. Rule 17-2.700(7).

12. Any change in the method of operation, raw materials, chemicals processed, equipment, or operating hours pursuant to F.A.C. Rule 17-2.100, Definitions-Modification, shall be submitted for approval to the Department's Bureau of Air Regulation office.

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

14. An application for an operation permit shall be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for

PERMITTEE:
TP&GCC

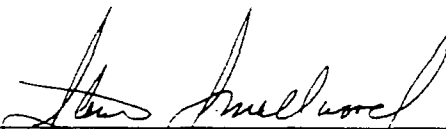
Permit Number: AC 62-197417
Expiration Date: May 31, 1993

SPECIFIC CONDITIONS:

an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed while noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 27th day
of September, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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