



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

November 1, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. C. S. Aiken, Plant Manager  
The Procter & Gamble Cellulose Company  
Rt. 3, Box 260  
Perry, Florida 32347

Dear Mr. Aiken:

Re: Typographical Correction of the County Name on the Cover Page  
of the Construction Permit No. AC 62-197417

Based on a meeting on November 1, 1991, with Messrs. Clifford Henry (P&GCC) and Bruce Mitchell (FDER/DARM/BAR), the Department acknowledges that the county name on the cover page to the above referenced construction permit is incorrect (Taylor vs Bay), even though the UTM coordinates and the latitudinal and longitudinal numbers place the facility in Taylor County. Please replace the cover page with the enclosed corrected cover page.

If there are any questions, please call Mr. Bruce Mitchell at (904) 488-1344 or write to me at the above address.

Sincerely,

for C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/BM/rbm

cc: A. Kutyna, NED  
A. M. Kinghorn, P.E., SEC  
C. Henry, P&GCC



# 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:** Taylor  
**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.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

In the matter of an  
Application for Permit by:

DER File No. AC 62-197417  
Taylor County

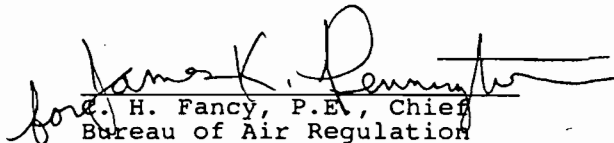
Mr. C. S. Aiken, Plant Manager  
The Procter & Gamble Cellulose Company  
Rt. 3, Box 260  
Perry, Florida 32347

Enclosed is Permit Number AC 62-197417 to modify the facility by installing equipment, as a sidestream project, to process pulp, issued pursuant to Section(s) 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
James K. Pennington, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 9/30/91 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,  
on this date, pursuant to  
§120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

  
Henri Weber  
(Clerk) 9/30/91  
(Date)

Copies furnished to:

A. Kutyna, NED  
A. M. Kinghorn, P.E., SEC

Final Determination

The Procter & Gamble Cellulose Company  
Taylor County  
Perry, Florida

Construction Permit No.  
AC 62-197417

Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

September 19, 1991

## Final Determination

The construction permit application package has been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Taco Times on August 28, 1991. The Technical Evaluation and Preliminary Determination was distributed on July 24, 1991, and available for public inspection at the Department's Northeast District office and the Department's Bureau of Air Regulation office.

There were no comments received during the public notice period. Therefore, it is recommended that the construction permit be issued as drafted.



**PROCTER & GAMBLE  
CELLULOSE**

**Best Available Copy**

THE PROCTER & GAMBLE CELLULOSE COMPANY  
P.O. BOX 260  
PERRY, FLORIDA 32347-9500  
PHONE (904) 784-0121

**RECEIVED**

SEP 3 1991

Division of Air  
Resources Management

August 30, 1991

Mr. Barry Andrews  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Publication of "Notice of Intent to Issue Permit"  
for a modification of existing facility to install  
equipment, as a sidestream project, to process pulp.  
Construction Permit Number AC62-197417

Dear Mr. Andrews:

Enclosed is one copy of the Affidavit verifying publication of the "Notice of Intent to Issue Permit" for the installation of equipment, as a sidestream project, to process pulp at Procter & Gamble Cellulose Company's existing facility in Perry, Florida. The "Notice of Intent to Issue Permit", the "Preliminary and Technical Evaluation", and the "Draft Construction Permit" for this project was received by P&G Cellulose on August 15, 1991. The "Notice of Intent to Issue Permit" was published one time in accordance with DER Rule number 17-103.150 of the F.A.C.

The date of publication of the "Notice of Intent to Issue Permit" was August 28, 1991 in the "Taco Times" Legal Advertisements section. The "Taco Times" is a newspaper with general circulation in the affected area of Taylor County, Florida. This date of publication was within the 30 day period from the date on which the document was received by the Procter & Gamble Cellulose Company. This "proof of publication" is being submitted within the seven day period directly after the publication.

If you have any questions or need additional information please contact me at (904)584-0347.

Very Truly Yours,

The Procter & Gamble Cellulose Co.

*Clifford Henry*  
Clifford Henry  
Environmental Control Manager

cc: B. Mitchell  
A. Hutson, RE List

Best Available Copy

THE TACO TIMES  
Published Weekly in City of Perry  
County of Taylor  
State of Florida

STATE OF FLORIDA,  
COUNTY OF TAYLOR

AFFIDAVIT OF PUBLICATION

Before me, the undersigned authority, personally appeared DONALD D. LINCOLN, who on oath says that he is the PUBLISHER of the Taco Times, weekly newspaper published in Perry, Taylor County, Florida, that the attached copy of advertisement being a notice to appear in

LEGAL  
Notice of Intent of Issue  
was published in said newspaper in the issues of: Aug. 28 (1991)

Affiant says further that the said Taco Times is a newspaper published at Perry in said Taylor County, Florida, and that the said newspaper has heretofore been continuously published in said Taylor County, Florida, each week; has been entered as second class mail matter at the Post Office in Perry, Florida, in said Taylor County, Florida for a period of one year next preceding the first publication of the attached copy of notice to appear; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

*Donald D. Lincoln*  
Donald D. Lincoln, Publisher

Seen to and subscribed before me this 28th day of August 1991

*Patricia J. ...*  
Notary Public

NOTARY PUBLIC, STATE OF FLORIDA  
My Commission Expires Jan. 24, 1995  
Bonded through The Travelers

State of Florida  
Department of Environmental Regulation  
Notice of Intent of Issue  
The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to The Procter and Gamble Cellulose Company, P.O. Box 260, Perry, Taylor County, Florida 32347, to modify the facility by installing a side stream project to ... A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. Failure to file a petition within the time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

- The Petition shall contain the following information:
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number, and the county in which the project is proposed;
  - (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
  - (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
  - (d) A statement of the material facts disputed by Petitioner, if any;
  - (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
  - (f) A statement of which rules or statutes petitioner contends requires reversal or modification of the Department's action or proposed action; and,
  - (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action for proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C. The application is available for public inspection during business hours, 8 a.m. to 5 p.m., Monday through Friday, except legal holidays, at: Department of Environmental Regulation Bureau of Air Regulation 2600 Blair Stone Road

Department of Environmental Regulation  
Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7577  
Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. The Department mailed within 14 days of the publication of this notice will be considered in the Department's final determination.  
8/28



# 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., 8760 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

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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) PM<sub>10</sub> 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 PM<sub>10</sub> 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

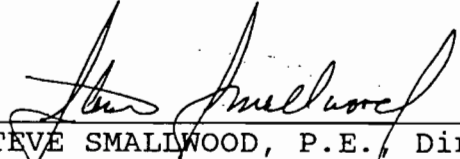
Permit Number: AC 62-197417  
Expiration Date: May 31, 1993

**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 27<sup>th</sup> day  
of September, 1991

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

August 14, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED


Mr. C. S. Aiken  
Plant Manager  
The Procter & Gamble Cellulose Company  
Rt. 3, Box 260  
Perry, Florida 32347

Dear Mr. Aiken:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to modify 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.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

  
C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/BM/rbm

Attachments

c: A. Kutyna, NE District  
A. M. Kinghorn, P.E., SEC

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

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

DER File No. AC 62-197417  
Taylor County

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INTENT TO ISSUE

The Department of Environmental Regulation gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, The Procter & Gamble Cellulose Company, applied on May 23, 1991, to the Department of Environmental Regulation for a permit to modify the facility by installing equipment, as a sidestream project, to process pulp.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address listed below or telephone (904)488-1344. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.



The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

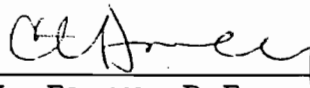
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under

Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



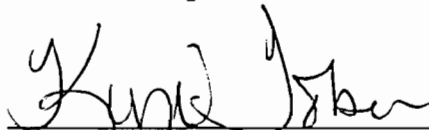
C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 8-14-91 to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**  
FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



Clerk

8-14-91

Date

Copies furnished to:

- A. Kutyna, NE District
- A. M. Kinghorn, P.E., SEC
- C. Henry, TP&GCC

State of Florida  
Department of Environmental Regulation  
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to The Procter & Gamble Cellulose Company, Rt. 3, Box 260, Perry, Taylor County, Florida 32347, to modify the facility by installing equipment, as a sidestream project, to process pulp. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Department of Environmental Regulation  
Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7577

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation  
and  
Preliminary Determination

The Procter & Gamble Cellulose Company  
Taylor County  
Perry, Florida

Construction Permit Number  
AC 62-197417

Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

August 14, 1991

## I. Application

### A. Applicant and Address

The Procter & Gamble Cellulose Company  
Rt. 3, Box 260  
Perry, Florida 32347-9512

### B. Project and Location

The mill intends to modify the facility by installing equipmet, as a sidestream project, to process pulp. The proposed project will not increase plant capacities, water usage, or effluent flow. The project will take place at The Procter & Gamble Cellulose Company's (TP&GCC) mill located in Taylor County, Florida. The UTM coordinates are Zone 17, 256.74 km East and 3328.70 km North.

### C. Process and Controls

The proposed sidestream project will utilize processed pulp and chemicals already used at the mill. The process will have associated exhausts (S1, S2 and S3) that vent pulp fibers and are minor emission sources of particulate matter (PM), PM<sub>10</sub> (10 micron size), and visible emissions (VE).

### D. SIC and SCC

1. The Standard Industrial Codes are:
  - o 2611: Pulp Mills
2. The Source Classification Codes are:
  - o Sulfate Kraft Pulping 3-07-001-99 Tons pulp produced (Sidestream Pulping)

## II. Rule Applicability

The modification is subject to preconstruction review in accordance with Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1990 version).

The application package was deemed complete on May 28, 1991.

The existing facility is a major facility for all of the criteria pollutants pursuant to F.A.C. Rule 17-2.100, Definitions.

The facility is located in Taylor County, which is an area designated attainment for all pollutants pursuant to F.A.C. Rule 17-2.420.

The following table exhibits the net potential/allowable pollutant emissions from the modification in tons per year (TPY):

Table 1

Source	Net Potential/Allowable Pollutant Emissions (TPY)	
	PM	PM <sub>10</sub>
Sidestream Project		
o S1	2.85	1.14
o S2	2.10	0.83
o S3	<u>3.07</u>	<u>1.23</u>
Total:	8.02	3.20

Note: o Maximum proposed hours of operation are 8760 hrs/yr.  
o PM<sub>10</sub> emissions @ 40% of PM emissions (test data).

Since the net potential pollutant emissions are not greater than the significant levels in Table 500-2, F.A.C. Chapter 17-2, the modification's potential emissions will be reviewed in accordance with F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

VE shall be less than 20% opacity, pursuant to F.A.C. Rule 17-2.610(2). Initial and annual VE compliance tests shall be conducted using EPA Method 9 pursuant to F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

Initial and annual PM emissions compliance tests shall be conducted using EPA Method 5 pursuant to F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

Initial and annual PM<sub>10</sub> emissions compliance tests shall be conducted using EPA Method 201 or 201A, as published in 55 Federal Register (FR) 142246 (April 17, 1990) and amended in 56 FR 6278 (February 15, 1991).

All compliance test methods shall be in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A (July, 1990 version).

The proposed project is subject to the provisions of F.A.C. Rule 17-2.620(2), Objectionable Odors Prohibited.

The proposed project is subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operations-Problems.

### III. Summary of Emissions

#### A. Emission Limitations

The proposed project will have allowable emission limits and standards for the pollutants PM, PM<sub>10</sub>, and VE. The following table reflects these limits and standards, which are based on the applicant's request/vendor's specifications plus a 20% margin of safety (except for the VE standard/limit):

Table 2

Source	Pollutant	Allowable Emission Limits/Standards
Sidestream Project		
o S1	PM	0.65 lb/hr; 2.85 TPY
	PM <sub>10</sub>	0.26 lb/hr; 1.14 TPY
	VE	less than 20% opacity
o S2	PM	0.48 lb/hr; 2.10 TPY
	PM <sub>10</sub>	0.19 lb/hr; 0.83 TPY
	VE	less than 20% opacity
o S3	PM	0.70 lb/hr; 3.07 TPY
	PM <sub>10</sub>	0.28 lb/hr; 1.23 TPY
	VE	less than 20% opacity

Note: 1) Annual hours of operation are 8760.

2) Volumetric flow rates are:

o S1 7150 acfm

o S2 5300 acfm

o S3 4420 acfm

3) Allowable emission rates include a 20% margin of safety above the vendor's specifications.

4) PM<sub>10</sub> emissions @ 40% of PM emissions (test data).

#### B. Ambient Air Quality Analysis

Based on a review of the proposed project, an air quality analysis was not required.



IV. Conclusion

Based on the information provided by TP&GCC, the Department has reasonable assurance that the modification of the facility by installing a sidestream pulping process, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.

*G. Prestar Lewis*  
# 41755  
8/13/91



# 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 40 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., 8760 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 40 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

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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) PM<sub>10</sub> 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 PM<sub>10</sub> 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 must 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).

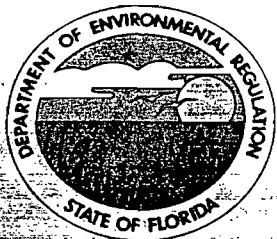
Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 1991

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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





# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 24, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. C. S. Aiken  
Plant Manager  
The Procter & Gamble Cellulose Company  
Rt. 3, Box 260  
Perry, Florida 32347

Dear Mr. Aiken:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to modify 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.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

for C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/BM/rbm

Attachments

c: A. Kutyna, NE District  
A. M. Kinghorn, P.E., SEC

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

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

DER File No. AC 62-197417  
Taylor County

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INTENT TO ISSUE

The Department of Environmental Regulation gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, The Procter & Gamble Cellulose Company, applied on May 23, 1991, to the Department of Environmental Regulation for a permit to modify the facility by installing equipment, as a sidestream project, to process pulp.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under

Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

*Barry D. Anderson*  
for C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 7-24-91 to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**

FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

*Harri Jober*  
Clerk

7-24-91  
Date

Copies furnished to:

- A. Kutyna, NE District
- A. M. Kinghorn, P.E., SEC
- C. Henry, TP&GCC

State of Florida  
Department of Environmental Regulation  
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to The Procter & Gamble Cellulose Company, Rt. 3, Box 260, Perry, Taylor County, Florida 32347, to modify the facility by installing equipment, as a sidestream project, to process pulp. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Department of Environmental Regulation  
Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7577

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation  
and  
Preliminary Determination

The Procter & Gamble Cellulose Company  
Taylor County  
Perry, Florida

Construction Permit Number  
AC 62-197417

Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

July 24, 1991.

## I. Application

### A. Applicant and Address

The Procter & Gamble Cellulose Company  
Rt. 3, Box 260  
Perry, Florida 32347-9512

### B. Project and Location

The mill intends to modify the facility by installing equipmet, as a sidestream project, to process pulp. The proposed project will not increase plant capacities, water usage, or effluent flow. The project will take place at The Procter & Gamble Cellulose Company's (TP&GCC) mill located in Taylor County, Florida. The UTM coordinates are Zone 17, 256.74 km East and 3328.70 km North.

### C. Process and Controls

The proposed sidestream project will utilize processed pulp and chemicals already used at the mill. The process will have an associated exhaust fan (S2) on a steam dryer and a cyclone separator on each of two pulp handling systems (S1 & S3) to vent and control pollutant emissions of particulate matter (PM), PM<sub>10</sub> (10 micron size), and visible emissions (VE).

### D. SIC and SCC

#### 1. The Standard Industrial Codes are:

o 2611: Pulp Mills

#### 2. The Source Classification Codes are:

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

## II. Rule Applicability

The modification is subject to preconstruction review in accordance with Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1990 version).



The application package was deemed complete on May 28, 1991.

The existing facility is a major facility for all of the criteria pollutants pursuant to F.A.C. Rule 17-2.100, Definitions.

The facility is located in Taylor County, which is an area designated attainment for all pollutants pursuant to F.A.C. Rule 17-2.420.

The following table exhibits the net potential/allowable pollutant emissions from the modification in tons per year (TPY):

Table 1

Source	Net Potential/Allowable Pollutant Emissions (TPY)	
	PM	PM <sub>10</sub>
Sidestream Project		
o Cyclone (S1)	2.85	1.14
o Dryer Exhaust Fan (S2)	2.10	0.83
o Cyclone (S3)	3.07	1.23
Total:	8.02	3.20

Note: o Maximum proposed hours of operation are 8760 hrs/yr.  
o PM<sub>10</sub> emissions @ 40% of PM emissions (test data).

Since the net potential pollutant emissions are not greater than the significant levels in Table 500-2, F.A.C. Chapter 17-2, the modification's potential emissions will be reviewed in accordance with F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

VE shall be less than 20% opacity, pursuant to F.A.C. Rule 17-2.610(2). Initial and annual VE compliance tests shall be conducted using EPA Method 9 pursuant to F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

Initial and annual PM emissions compliance tests shall be conducted using EPA Method 5 pursuant to F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

Initial and annual PM<sub>10</sub> emissions compliance tests shall be conducted using EPA Method 201 or 201A, as published in 55 Federal Register (FR) 142246 (April 17, 1990) and amended in 56 FR 6278 (February 15, 1991).

All compliance test methods shall be in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A (July, 1990 version).

The proposed project is subject to the provisions of F.A.C. Rule 17-2.620(2), Objectionable Odors Prohibited.

The proposed project is subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operations-Problems.

### III. Summary of Emissions

#### A. Emission Limitations

The proposed project will have allowable emission limits and standards for the pollutants PM, PM<sub>10</sub>, and VE. The following table reflects these limits and standards, which are based on the applicant's request/vendor's specifications plus a 20% margin of safety (except for the VE standard/limit):

Table 2

Source	Pollutant	Allowable Emission Limits/Standards
Sidestream Project		
o Cyclone (S1)	PM	0.65 lb/hr; 2.85 TPY
	PM <sub>10</sub>	0.26 lb/hr; 1.14 TPY
	VE	less than 20% opacity
o Dryer Exhaust Fan (S2)	PM	0.48 lb/hr; 2.10 TPY
	PM <sub>10</sub>	0.19 lb/hr; 0.83 TPY
	VE	less than 20% opacity
o Cyclone (S3)	PM	0.70 lb/hr; 3.07 TPY
	PM <sub>10</sub>	0.28 lb/hr; 1.23 TPY
	VE	less than 20% opacity

Note: 1) Annual hours of operation are 8760.

2) Volumetric flow rates are:

o S1 7150 acfm

o S2 5300 acfm

o S3 4420 acfm

3) Allowable emission rates include a 20% margin of safety above the vendor's specifications.

4) The dryer is a steam dryer with no associated fuel combustion.

5) PM<sub>10</sub> emissions @ 40% of PM emissions (test data).

#### B. Ambient Air Quality Analysis

Based on a review of the proposed project, an air quality analysis was not required.

IV. Conclusion

Based on the information provided by TP&GCC, the Department has reasonable assurance that the modification of the facility by installing a sidestream pulping process, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.

*Barry D. Brubaker*  
# 36.024  
7-24-91

IV. Conclusion

Based on the information provided by TP&GCC, the Department has reasonable assurance that the modification of the facility by installing a sidestream pulping process, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.

*Bobby D. Brewer*  
# 36.024  
7-24-91



# 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: Aug. 31, 1992**

**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 40 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 control potential pollutant emissions of particulate matter and visible emissions with cyclones (2). 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 July 24, 1991.

PERMITTEE:  
TP&GCC

Permit Number: AC 62-197417  
Expiration Date: August 31, 1992

**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: August 31, 1992

**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: August 31, 1992

**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: August 31, 1992

**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., 8760 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 40 CFR (July, 1990 version).
5. The sidestream pulping process shall not exceed the following pollutant emission standards/limitations:

Source	Pollutant	Standard/Limitation
o Cyclone (S1)	PM	0.65 lb/hr; 2.85 TPY
	PM10	0.26 lb/hr; 1.14 TPY
	VE	less than 20% opacity
o Dryer Exhaust Fan (S2)	PM	0.48 lb/hr; 2.10 TPY
	PM <sub>10</sub>	0.19 lb/hr; 0.83 TPY
	VE	less than 20% opacity
o Cyclone (S3)	PM	0.70 lb/hr; 3.07 TPY
	PM <sub>10</sub>	0.28 lb/hr; 1.23 TPY
	VE	less than 20% opacity

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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) The dryer is a steam dryer with no associated fuel combustion.
  - 4) PM<sub>10</sub> emissions @ 40% of PM emissions (test data).

PERMITTEE:  
TP&GCC

Permit Number: AC 62-197417  
Expiration Date: August 31, 1992

**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 PM<sub>10</sub> 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 control 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 must 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: August 31, 1992

**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 \_\_\_\_\_ day  
of \_\_\_\_\_, 1991

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

---

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

Meeting on 3/21/91 @ 9:30 a.m.

Bruce Mitchell  
Clifford Henry

FDER/DARM/BAR 904-488-1344  
Procter & Gamble 904-584-0347

Susanne Stevens  
Jim Williamson  
Mike Hasley

P+GC 901-320-8425  
P&G 901-320-8400  
FDER/DARM/BAR (904) 488-1344



**PROCTER & GAMBLE  
CELLULOSE**

RT. 3, BOX 260  
PERRY, FL 32347-9512  
OFF. (904) 584-0347  
RES. (904) 584-5170

**CLIFFORD E. HENRY**  
ENVIRONMENTAL MANAGER

- ① #2 Mill side-stream modification
- ② allowable vs potential
- ③ actuals vs. future potentials on  
other affected sources (i.e., steam vs.  
power boiler(s), etc.)
- ④ confidential material



**PROCTER & GAMBLE  
CELLULOSE**

OFFICES: 1001 TILLMAN STREET  
PHONE: (901) 320-8425  
TELEFAX: (901) 320-8482  
MAILING ADDRESS: P.O. BOX 8407  
MEMPHIS, TENNESSEE 38108-0407

**SUSANNE STEVENS**  
ENVIRONMENTAL CONTROL ENGINEER  
PROCESS RELIABILITY



**PROCTER & GAMBLE  
CELLULOSE**

OFFICES: 1001 TILLMAN STREET  
PHONE: (901) 320-8400  
TELEFAX: (901) 320-8482  
MAILING ADDRESS: P.O. BOX 8407  
MEMPHIS, TENNESSEE 38108-0407

**JAMES C. WILLIAMSON**  
PROCESS RELIABILITY

Meeting on 3/21/91 @ 9:30am.

Bonnie Mitchell

FDER/DARM/BAR

904-488-1344

Clifford Henry

Procter & Gamble

904-584-0347

Susanne Stevens

P+GC

901-320-8425

Jim Williamson

P+GC

901-~~320~~-8400

Mike Harley

FDER/DARM/BAR

(904) 488-1344

Meeting on 3/21/91 @ 9:30 am.

Bonnie Mitchell

FDER/DARM/BAR

404-488-1344

Clifford Henry

Procter & Gamble

904-584-0347

Susanne Stevens

P+GC

901-320-8425

Jill Williamson

P+GC

901-320-8400

Mike Harley

FDER/DARM/BAR

(904) 488-1344

Meeting on 3/21/91 @ 9:30 am.

Bonnie Mitchell

FDER/DARM/BAR

904-488-1344

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P+GC

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Jill Williamson

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901-320-8400

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(904) 488-1344

Meeting on 3/21/91 @ 9:30 am.

Benn Mitchell

FDER/DARM/BAR

404-488-1344

Clifford Henry

Procter & Gamble

904-584-0347

Susanne Stevens

P+G-C

901-320-8425

Jill Williamson

P+G-C

901-320-8400

Mike Harley

FDER/DARM/BAR

(904) 488-1344



THE PROCTER & GAMBLE CELLULOSE COMPANY  
SIDESTREAM PROJECT  
MEETING WITH FDER  
3/21/91

OBJECTIVES:

1. Explain project scope
2. Identify any additional information needed by FDER
3. Define proper handling of confidential material

AGENDA:

- |                          |                 |
|--------------------------|-----------------|
| 1. Introduction          | -Clifford Henry |
| 2. Process description   | -Jim Williamson |
| 3. Air emissions         | -Sue Stevens    |
| 4. Application package   | -Sue Stevens    |
| 5. Confidential material | -Sue Stevens    |
| 6. Wrap up               | -Clifford Henry |



**PROCTER & GAMBLE  
CELLULOSE**

THE PROCTER & GAMBLE CELLULOSE COMPANY  
RT 3, BOX 260  
PERRY, FLORIDA 32347-9512  
PHONE (904) 584-0121

May 28, 1991

Mr. Clair H. Fancy, Chief  
Bureau of Air Regulation  
Florida Department of Environmental  
Regulation  
2600 Blair Stone Road  
Tallahassee, Fl. 31399-2400

**RECEIVED**

**MAY 28 1991**

Bureau of  
Air Regulation

Re: Application to Construct Air Pollution Source for  
Sidestream Project

Dear Mr. Fancy:

Enclosed are four (4) copies of an application, including attachments and permit fee, to construction a facility to process pulp at Procter & Gamble Cellulose plant. Enclosed also are two (2) copies of the confidential attachments with proprietary information which we are requesting special protection. If you only need one (1) copy of the confidential attachment, please return the other copy to me.

At a pre-application meeting with Mr. Bruce Mitchell, we explained that Sidestream project will install equipment to process pulp. Mr. Mitchell had several suggestions and questions which are addressed in the permit application.

If you have any questions, please me at (904) 584-0347.

Very truly yours,

The Procter & Gamble Cellulose  
Company

Clifford Henry  
Plant Environmental Control manager

*cc. B. Mitchell  
A. Kutyna*



PROCTER & GAMBLE  
CELLULOSE

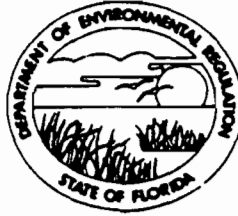
AIR PERMIT APPLICATION  
SIDESTREAM PROJECT

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

#200pd.  
5-28-91  
Receipt #151276

NORTHEAST DISTRICT

3426 BILLS ROAD  
JACKSONVILLE, FLORIDA 32207  
(904) 396-6959



AC62-197417

BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

ERNEST E. FREY  
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Kraft Pulp & Paper  New<sup>1</sup>  Existing<sup>1</sup>

APPLICATION TYPE:  Construction  Operation  Modification

COMPANY NAME: The Procter & Gamble Cellulose Company COUNTY: Taylor

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Sidestream Project

SOURCE LOCATION: Street 5 to 6 miles southeast of Perry City Perry

UTM: East 256,740 North 3,328,700

Latitude 30° 03' 59" N Longitude 83° 33' 12" W

APPLICANT NAME AND TITLE: C.S. Aiken, Plant Manager

APPLICANT ADDRESS: Route 3 Box 260 Perry, FL 32347

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of The Procter & Gamble Cellulose Company

I certify that the statements made in this application for a construction permit are true, correct and complete to the best of my knowledge and belief. Further I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization  
Previously Submitted

Signed: C.S. Aiken

C.S. Aiken, Plant Manager  
Name and Title (Please Type)

Date: 5/21/91 Telephone No. (904)584-0121

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

<sup>1</sup> See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed *A.M. Kinghorn*  
A.M. Kinghorn

Sirrine Environmental Consultants  
Name (Please Type)

P.O. Box 24000, Greenville, SC 29616  
Company Name (Please Type)

Mailing Address (Please Type)

Florida Registration No. 38928 Date: 5-13-91 Telephone No. (803)234-3004

**SECTION II: GENERAL PROJECT INFORMATION**

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

(See Attachment 1)

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction 9/1/91 Completion of Construction 5/1/93

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

N/A

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52;  
if power plant, hrs/yr \_\_\_\_\_; if seasonal, describe: N/A

F. If this is a new source or major modification, answer the following questions.  
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? No
  - a. If yes, has "offset" been applied? N/A
  - b. If yes, has "Lowest Achievable Emission Rate" been applied? N/A
  - c. If yes, list non-attainment pollutants. N/A
2. Does best available control technology (BACT) apply to this source?  
If yes, see Section VI. No
3. Does the State "Prevention of Significant Deterioration" (PSD)  
requirement apply to this source? If yes, see Sections VI and VII. No
4. Do "Standards of Performance for New Stationary Sources" (NSPS)  
apply to this source? No
5. Do "National Emission Standards for Hazardous Air Pollutants"  
(NESHAP) apply to this source? No
- H. Do "Reasonably Available Control Technology" (RACT) requirements apply  
to this source? No
  - a. If yes, for what pollutants? N/A
  - b. If yes, in addition to the information required in this form,  
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-  
cation for any answer of "No" that might be considered questionable.

**SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)**

**A. Raw Materials and Chemicals Used in your Process, if applicable:**

\*\* See confidential attachment C3

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

**B. Process Rate, if applicable: (See Section V, Item 1)**

1. Total Process Input Rate (lbs/hr): \_\_\_\_\_

2. Product Weight (lbs/hr): 2296

**C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)**

See attachment 2

Name of Contaminant	Emission <sup>1</sup>		Allowed <sup>2</sup> Emission Rate per Rule 17-2	Allowable <sup>3</sup> Emission lbs/hr	Potential <sup>4</sup> Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	

<sup>1</sup>See Section V, Item 2.

<sup>2</sup>Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

<sup>3</sup>Calculated from operating rate and applicable standard.

<sup>4</sup>Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

\*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: \_\_\_\_\_ Percent Ash: \_\_\_\_\_

Density: \_\_\_\_\_ lbs/gal Typical Percent Nitrogen: \_\_\_\_\_

Heat Capacity: \_\_\_\_\_ BTU/lb \_\_\_\_\_ BTU/gal

Other Fuel Contaminants (which may cause air pollution): \_\_\_\_\_

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average \_\_\_\_\_ Maximum \_\_\_\_\_

G. Indicate liquid or solid wastes generated and method of disposal.

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H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ ft.  
 Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM Gas Exit Temperature: \_\_\_\_\_ °F.  
 Water Vapor Content: \_\_\_\_\_ % Velocity: \_\_\_\_\_ FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste \_\_\_\_\_  
 Total Weight Incinerated (lbs/hr) \_\_\_\_\_ Design Capacity (lbs/hr) \_\_\_\_\_  
 Approximate Number of Hours of Operation per day \_\_\_\_\_ day/wk \_\_\_\_\_ wks/yr. \_\_\_\_\_  
 Manufacturer \_\_\_\_\_  
 Date Constructed \_\_\_\_\_ Model No. \_\_\_\_\_

	Volume (ft) <sup>3</sup>	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ Stack Temp. \_\_\_\_\_  
 Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM\* Velocity: \_\_\_\_\_ FPS

\*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device:  Cyclone  Wet Scrubber  Afterburner  
 Other (specify) \_\_\_\_\_

Brief description of operating characteristics of control devices: \_\_\_\_\_

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

### SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]  
See confidential attachment C4
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.  
See attachment 3 and 4
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).  
See attachment 3
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.) N/A
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency). N/A
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.  
See confidential attachment C2
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).  
See attachment 6 (figure 2)
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

**SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY**

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes  No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes  No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- |                           |                          |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:*           | 4. Capital Costs:        |

\*Explain method of determining



- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:<sup>1</sup>
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:<sup>2</sup>
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:<sup>1</sup>
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:<sup>2</sup>
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:<sup>1</sup>
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:<sup>2</sup>
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration


(8) Process Rate:<sup>1</sup>

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration


(8) Process Rate:<sup>1</sup>

10. Reason for selection and description of systems:

<sup>1</sup>Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

**SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION** N/A

**A. Company Monitored Data**

1. \_\_\_\_\_ no. sites \_\_\_\_\_ TSP \_\_\_\_\_ ( ) SO<sub>2</sub>\* \_\_\_\_\_ Wind spd/dir

Period of Monitoring \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year

Other data recorded \_\_\_\_\_

Attach all data or statistical summaries to this application.

\*Specify bubbler (B) or continuous (C).



THE PROCTER & GAMBLE CELLULOSE COMPANY  
SIDESTREAM PROJECT  
PERMIT APPLICATION ATTACHMENTS

1. Project Description
2. Emission Estimates
3. Emission Calculation
4. Compliance Method
5. Emission Stack Geometry and Flow Characteristics
6. USGS Location Map
7. Site Plot Plan

Confidential Attachments:

- C1. Process Description
- C2. Process Flow Diagram
- C3. Permit Application Section III.A.
- C4. Process Input Rate Calculation
- C5. Emissions Test Data



ATTACHMENT 1

THE PROCTER & GAMBLE CELLULOSE COMPANY  
SIDESTREAM PROJECTS  
PROJECT DESCRIPTION

The Project will install equipment to process pulp. It will not increase plant capacity, water usage, or effluent flow. The equipment is a minor source of air emissions of particulate matter.

It is estimated that a total of 6.64 tons/year of particulate will be emitted from the equipment. This is below the 25 ton/year significance level for PSD permitting and is in compliance with the particulate emission standards of FAC section 17-2.610 (1)(b). At least 60% of the particulate matter is greater than 10 microns in diameter. Therefore, PM-10 emissions at 2.66 tons/year, are below the significance level for PSD permitting. This project will not result in an increase in emissions from the existing facility.

ATTACHMENT 2

THE PROCTER & GAMBLE CELLULOSE COMPANY

SIDESTREAM PROJECT

EMISSION ESTIMATES

Name of Contaminant	Emissions		Allowable Emissions lb/hr	Potential Emissions		Relate To Flow Diagram	
	Maximum	Actual		lb/hr	T/yr		
Total Particulate	.54	2.36	.65	2,85	4720	2.36	S1
Total Particulate	.40	1.74	.48	2110	3480	1.74	S2
Total Particulate	.58	2.54	.70	3,07	5080	2.54	S3
PM-10	.22	.94	.26	1,14	1890	.94	S1
PM-10	.16	.70	.19	0,83	1390	.70	S2
PM-10	.23	1.02	.28	1,23	2030	1.02	S3

ATTACHMENT 3

THE PROCTER & GAMBLE CELLULOSE COMPANY

EMISSIONS CALCULATIONS FOR PARTICULATE MATTER (PM) AND PM-10

ACTUAL (MAXIMUM) RATES:

(S1) 7150 ACFM, PM concentration 20 mg/m<sup>3</sup> - vendor's estimate

$$7150 \frac{\text{ft}^3}{\text{min}} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{20 \text{ mg}}{\text{m}^3} \times \frac{\text{m}^3}{35.31 \text{ ft}^3} \times \frac{\text{lb}}{453,590 \text{ mg}}$$

= 0.54 lbs/hr = 2.36 ton/yr PM

PM-10 = 40% of PM - test data .40 x 2.36 tons/yr = .94 tons/yr PM-10

(S2) 5300 ACFM, PM concentration 20 mg/m<sup>3</sup> - test data

$$5300 \frac{\text{ft}^3}{\text{min}} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{20 \text{ mg}}{\text{m}^3} \times \frac{\text{m}^3}{35.31 \text{ ft}^3} \times \frac{\text{lb}}{453,590 \text{ mg}}$$

= 0.40 lbs/hr = 1.74 ton/yr PM

PM-10 = 40% of PM - test data .40 x 1.74 tons/yr = .70 tons/yr PM-10

(S3) 4420 ACFM, PM concentration 35 mg/m<sup>3</sup> - vendor's estimate

$$4420 \frac{\text{ft}^3}{\text{min}} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{35 \text{ mg}}{\text{m}^3} \times \frac{\text{m}^3}{35.31 \text{ ft}^3} \times \frac{\text{lb}}{453,590 \text{ mg}}$$

= 0.58 lbs/hr = 2.54 ton/yr PM

PM-10 = 40% of PM - test data .40 x 2.54 tons/yr = 1.02 tons/yr PM-10

ALLOWABLE RATES:

Allowable emissions are calculated by adding a 20% margin to the maximum emission rates.

TEST DATA:

See confidential attachment C5.

ATTACHMENT 4

THE PROCTER & GAMBLE CELLULOSE COMPANY  
SIDESTREAM PROJECT

PROPOSED COMPLIANCE METHODS

We recommend that compliance with the particulate emissions standard of FAC 17-2.610(1)(b) be demonstrated using EPA Method 5. This method, which is described in detail in 40 CFR 60 (Appendix A, Method 5), is applicable for the determination of particulate emissions from stationary sources.

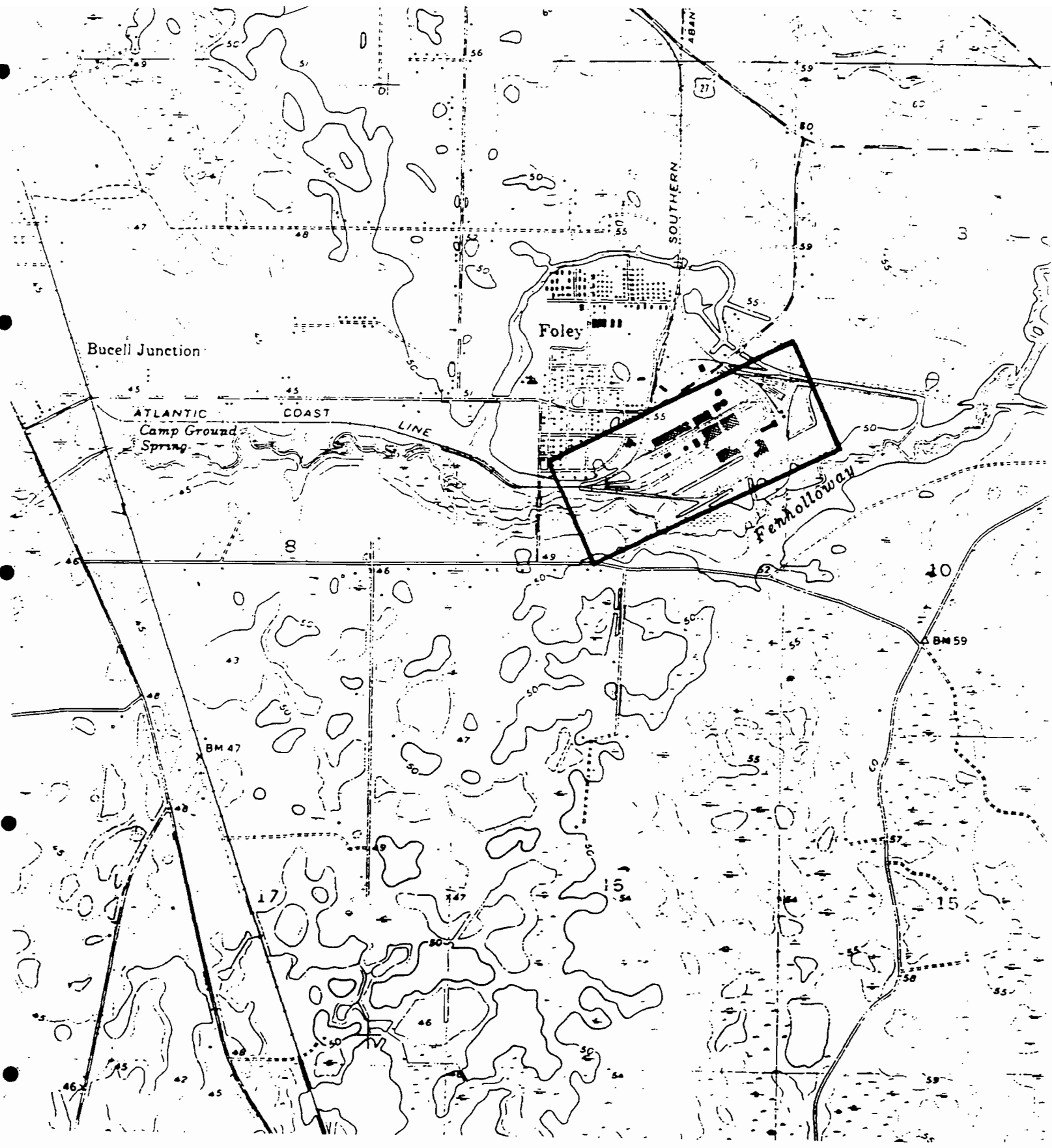
ATTACHMENT 5

THE PROCTER & GAMBLE CELLULOSE COMPANY  
SIDESTREAM PROJECT

EMISSION STACK GEOMETRY AND FLOW CHARACTERISTICS

	STACK		
	S1	S2	S3
Stack height, ft.	35	35	35
Stack diameter, ft.	1.67	1.50	1.33
Gas flow rate - ACFM	7150	5300	4420
Gas flow rate - DSCFM	6282	3400	4322
Gas exit temperature, °F	110°	240°	80°
Water vapor content, %	3	12.5	0
Velocity, FPS	55	50	53

3/14/91



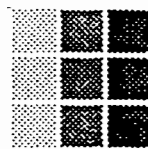
**FIGURE 2**

U.S.G.S. Location Map

**Procter & Gamble Cellulose Co.**

Foley Plant — Perry, Florida

G-9263



**SIRRINE**  
ENVIRONMENTAL  
CONSULTANTS

