



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

November 15, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. S. Aiken, Plant Manager  
Buckeye Florida, Limited Partnership  
Route 3, Box 260  
Perry, Florida 32347

Dear Mr. Aiken:

Re: Amendment of Permit No. AO 62-187788  
No. 3 Recovery Boiler

The Department has reviewed your October 2, 1995, letter requesting permission to replace the two existing wet bottom electrostatic precipitators (ESP) controlling the emissions from the No. 3 Recovery Boiler at the pulp mill in Perry, Taylor County, Florida, with one equivalent dry bottom ESP. Data provided by your Environmental Control Manager, Mr. Bruce Harding, in a letter dated November 1, 1995, and by KBN Engineering and Applied Sciences, Inc. in a letter dated September 28, 1995, has provided reasonable assurance that the performance of the new ESP will be equivalent to or better than the two ESP it replaces.

The permit for the No. 3 Recovery Boiler is amended:

From:

EP#07 No. 3 Recovery Boiler (RB) with particulate matter (PM) controlled by 3A electrostatic precipitator (ESP) and 3B ESP. Total reduced sulfur (TRS) compounds are reduced by a two-stage black liquor oxidation system (P&G/Rust Engineering Design).

To:

EP#07 No. 3 Recovery Boiler (RB) with particulate matter (PM) controlled by a dry bottom rigid electrode design electrostatic precipitator (ESP) with a guaranteed collection efficiency of 99.14 percent. Total reduced sulfur (TRS) compounds are reduced by a two-stage black liquor oxidation system (P&G/Rust Engineering Design).

This amendment does not authorize any increase in recovery boiler operating capacity, pollutant emission rates, nor any significant changes in flue gas parameters.

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

*Printed on recycled paper.*

Mr. C. S. Aiken  
November 15, 1995  
Page Two

A person whose substantial interests are affected by the Department's permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (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 applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of their receipt of this amendment. 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 the petitioner wants the Department to take with respect to the Department's action or proposed action.

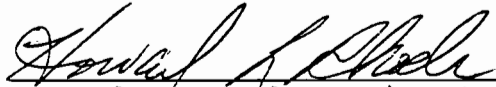
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment request/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 receipt of this amendment in the Office of General Counsel at the above

Mr. C. S. Aiken  
November 15, 1995  
Page Three

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, Florida Administrative Code.

A copy of this amendment letter shall be attached to and become a part of Air Construction Permit AO 62-187788.

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**



Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/wh/t

Enclosures: Buckeye October 2, 1995 letter  
DEP October 24, 1995 letter  
Buckeye November 1, 1995 letter


cc: D. Buff, KBN  
C. Kirts, NED

CERTIFICATE OF SERVICE

This is to certify that this **Permit Amendment** and all copies were mailed to the listed persons before the close of business on 11-15-95.

**FILING AND ACKNOWLEDGEMENT**

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

  
(Clerk)

11-15-95  
(Date)

Memorandum

Florida Department of  
Environmental Protection

AL  
/

TO: Howard L. Rhodes  
THRU: A. A. Linero *AAL* 11/19  
Clair Fancy  
FROM: Willard Hanks  
DATE: November 15, 1995  
SUBJ: Buckeye Florida - Recovery Boiler No. 3

Attached for your approval and signature is a letter that will amend the permit for Recovery Boiler No. 3 at Buckeye Florida's paper mill in Perry, Taylor County, Florida. The amendment will allow 2 existing wet electrostatic precipitator (ESP) controlling this boiler to be replaced with 1 equivalent dry ESP. There is no change in plant capacity or emissions.

I recommend your approval and signature.

WH/kt

attachment



# Buckeye Florida

Route 3, Box 260 • Perry, Florida 32347  
Telephone: (904) 584-1121

**RECEIVED**

NOV 03 1995

BUREAU OF  
AIR REGULATION

*letter  
w/ document*

November 1, 1995

Mr. A. A. Linero, P.E.  
Administrator, New Source Review Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Buckeye Florida, Limited Partnership  
Permit: AO62-187788; Source ID: 31JAX62000107  
No. 3 Recovery Boiler

Dear Mr. Linero:

In response to your letter dated October 24, 1995, we are submitting supplemental information on the existing electrostatic precipitators and the proposed electrostatic precipitator (ESP). We have enclosed copies of the current operation permit, the most recent construction permits, and supplemental design information for the ESP's. We have included page 32 of 36 from our ESP Specification as well as pages 3:1 and 3:2 of the final proposal from Environmental Elements Corporation with whom we have contracted to supply the new ESP. We hope that this supplemental information is sufficient to meet the Department's needs. If you have any questions or need more information, please call Ray Perry at (904)-584-1333.

Sincerely,

BUCKEYE FLORIDA, LIMITED PARTNERSHIP

Bruce Harding  
Environmental Control Manager

CC:  
David Buff, P.E., KBN

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 C.S. Aiken, Plant Mgr  
 Buckeye Fla., Ltd PknsP  
 Route 3, Box 260  
 Perry, Fl 32347

4a. Article Number  
 Z 127 632 572

4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
 11/17/95

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)  
 [Signature]

PS Form 3811, December 1991 \*U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 127 632 572



**Receipt for Certified Mail**

No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

Sent to	C.S. Aiken
Street and No.	Buckeye Fla
City, State and ZIP Code	Perry Fl
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	NO 62-187788
	No.3 Rec. Boiler

PS Form 3800, March 1993



# BUCKEYE ENVIRONMENTAL CONTROL

## FACSIMILE TRANSMISSION

TO: Willard Hanks  
OF: FDEP-BAR  
@FAX: 904-922-6979 Total Pages 10

MESSAGE:

Copy of the package and return receipt

Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b>		I also wish to receive the following services (for an extra fee):		
	<ul style="list-style-type: none"> <li>• Complete items 1 and/or 2 for additional services.</li> <li>• Complete items 3, and 4a &amp; b.</li> <li>• Print your name and address on the reverse of this form so that we can return this card to you.</li> <li>• Attach this form to the front of the mailpiece, or on the back if space does not permit.</li> <li>• Write "Return Receipt Requested" on the mailpiece below the article number.</li> <li>• The Return Receipt will show to whom the article was delivered and the date delivered.</li> </ul>		1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.		
	3. Article Addressed to:		4a. Article Number		
	Mr. Clair Fancy FDEP-BAR 2600 Blair Stone Road Tallahassee, FL 32399-2400		P 383 770 088		
	5. Signature (Addressee)		4b. Service Type		
	6. Signature (Agent)		<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise		
PS Form 3877, December 1991		U.S. GPO: 1992-323-402		7. Date of Delivery	
				8. Addressee's Address (Only if requested and fee is paid)	
<b>DOMESTIC RETURN RECEIPT</b>					

Thank you for using Return Receipt Service.

FROM:

ENVIRONMENTAL CONTROL GROUP  
BUCKEYE FLORIDA, LIMITED PARTNERSHIP  
ROUTE 3 BOX 260; PERRY, FL 32347  
FAX: 904-584-1694 or 584-1738

- \_\_\_\_ Bruce Harding: Phone 584-1106
- \_\_\_\_ Paul Boilermann: Phone 584-1576
- Ray Perry: Phone 584-1335
- \_\_\_\_ Edye Rowell: Phone 584-1104

*11-7-95  
Marty Costello handling  
Told Ray Perry looks  
approved, letter out  
early December*

*cmh*

*Certified mail 45 585 110 088*



# Buckeye Florida

Route 3, Box 250 • Perry, Florida 32347  
Telephone: (904) 584-1121

September 15, 1995

Mr. Clair Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Buckeye Florida, Limited Partnership  
Facility: 31JAX620001; Permit: AC62-197417  
EU: 42,43,44; Sidestream Pulping Process

Dear Mr. Fancy:

As part of our preparation for submission of a Title V permit application, we have reviewed our current construction and operation permits as suggested by the Department. As such, we have identified a number of permit requirements to which we would propose changes as part of the Title V application process. We will address most potential permit "clean up" items within the context of the Title V application. However, we would like to pursue a change to the construction permit for our Sidestream Pulping Process prior to the Title v application.

The Sidestream Pulping Process (Sidestream) is a minor source (less than 10 TPY) of particulate (PM) emissions and particulate emissions with an aerodynamic diameter of 10 microns or less (PM10) located at our existing facility near Perry in Taylor County Florida. The Sidestream was constructed under the provisions of AC62-197417. This permit contains emissions limits and annual testing requirements for PM, PM10 and visible emissions. We would like the Department to issue an amendment to AC62-197417 to remove the emissions limits for PM10 and the annual testing requirements for PM10 and PM.

The basis for our request to remove the PM10 emissions limits and annual testing requirements is the peculiar and seemingly unreliable PM10 test results that we have obtained during initial and subsequent compliance testing of the Sidestream. Details are contained in Attachment 2. The basis for our request to remove the annual PM test requirement is that it is not required under FAC 62-297. Attachment 1 contains a summary of these requests along with suggested permit language that would effect these changes.

These proposed changes have been previously discussed during a July 13, 1995 meeting between Department Staff and Buckeye that included Mr. Bruce Mitchell, Mr. Al Linero, Mr. Bob Leetch, Mr. John Cole, Mr. Mort Benjamin of the Department and Mr. Ray Perry, Mr. Earle Greene, Mrs. Cecile Hance and Mr. David Buff of KBN. We have enclosed a check for \$250 to cover the processing fee. If you have any questions, please call Ray Perry at (904)-584-1333.

Sincerely,

BUCKEYE FLORIDA, LIMITED PARTNERSHIP

C. S. Aiken  
Plant Manager





**Attachment 1: Sidestream Pulping Process**

**Source:** Sidestream Pulping Process

**Permit#:** AC62-197417, expires January 31, 1996.

**Request:**

1. Issue an amendment to this permit that will remove the PM10 emissions limits and the annual testing requirements for PM10 and PM from the construction permit.

**Rationale:**

The Sidestream Pulping Process (Sidestream) processes bleached pulp. The emissions points in the Sidestream process are directly related to the pulp transport system within the Sidestream. There are three emissions points associated with the transport of pulp within the Sidestream: two process cyclone exhausts and one dryer exhaust. The process cyclones are part of the pneumatic conveying systems and the emissions are a function of their design efficiency. Since the Sidestream is a miscellaneous process, it is subject to FAC 62-296.310 General Particulate Emissions Limiting Standards. The emissions limits for PM and PM10 were permitted based on vendor estimates for the cyclones and the dryer exhaust.

The PM/PM10/VE were tested initially and subsequently. In both instances, it was indicated that the PM10 test results are unreliable and highly questionable for this source. Reference Attachment 2. In addition, the PM emissions were demonstrated to be well within the vendor estimates with no visible emissions. Since the Sidestream is a minor source of emissions, less than 10 Tons per Year of PM, we propose to drop the PM10 emissions limit and associated test requirements. We also propose the removal of the annual testing requirement for PM emissions. Annual testing is not required pursuant to FAC 62-297.340(1)(d). PM testing should only be required initially and for operation permit renewal.

**Proposal:** (suggested language)

1. Revise Specific Condition No. 5 to reflect the changes as follows:
  5. For PSD tracking purposes, the PM and PM10 emissions from the Sidestream Pulping Process are 8.02 and 3.2 tons per year respectively.
    - 5.a) The emissions rates for the sidestream pulping process are:

<u>Source</u>	<u>Pollutant</u>	<u>Maximum Allowable Emissions Rates</u>
S1	PM VE	0.65 lb/hr; 2.85 TPY 20% Opacity
S2	PM VE	0.48 lb/hr; 2.10 TPY 20% Opacity
S3	PM VE	0.70 lb/hr; 3.07 TPY 20% Opacity

Note: 1) Projected volumetric flow rates are:

S1	7150 acfm
S2	5300 acfm
S3	4420 acfm

2) Allowable emissions rates include a 20% margin of safety above vendor estimates

3) PM10 emissions are estimated at 40% of PM emissions

2. Revise Specific Condition No. 6 as follows:

*"Initial and subsequent compliance tests for PM emissions, shall be conducted in accordance with Rule 62-297 and 40 CFR 60 Appendix A, Method 5, Determination of Particulate Emissions from Stationary Sources."*

3. Revise Specific Condition No. 7 as follows:

*"Initial and annual compliance tests for VE shall be conducted in accordance with Rule 62-297 and 40 CFR 60, Appendix A, Method 9, Visual Determination of Opacity Emissions from Stationary Sources."*

**ATTACHMENT 2: SIDESTREAM PULPING PROCESS**

**PM10 Emissions:**

During both the initial testing and subsequent testing of the Sidestream, there were problems encountered with the PM10 testing. Attached are an excerpt from the Weston Test Report, a letter from ESE, a letter from NCASI, and a memo from EPA. In the case of the PM10 measurements, there appears to be considerable doubt as to the validity of EPA Method 201 & 201A for determining PM10 emissions of lightweight fibrous particulate matter.

The suspected cause of the problems are the non-spherical shape and the mass to surface area ratio of the material. Because of these physical characteristics, it is suspected that the particles do not exhibit the same aerodynamic behavior as spherical particles of the same mass for which the cyclonic separation devices used in the PM10 methods are designed. In addition, the wet pulp cyclone discharge has been found to contain entrained water droplets. The EPA memo recognizes that Method 201 & 201A are not applicable for gas streams of this type.



SECTION 2  
RESULTS AND DISCUSSION

Table 2-1 summarizes the results of the PM and PM<sub>10</sub> emission testing performed at the Buckeye Florida, L.P. mill in Perry, Florida. The following subsections provide detailed results of each aspect of the testing effort.

Table 2-1  
Summary of Emission Test Results

Source	Mean Test Values, lb/hr	
	PM	PM <sub>10</sub>
No. 1 Pulping Sidestream Vent		
December	0.17	0.29
January	0.07	----
No. 2 Pulping Sidestream Vent	0.07	0.02
No. 3 Pulping Sidestream Vent	0.13	0.08

FDGP ID#

42  
43  
44

During sampling in December 1994, PM<sub>10</sub> emissions from the No. 1 Pulping Sidestream Vent exceeded the total PM emissions. During subsequent retesting in January 1995, water droplets were found to be entrained in the gas stream. The United States Environmental Protection Agency (EPA) recognizes that there is not currently an acceptable method for the determination of PM<sub>10</sub> concentrations from gas streams containing entrained water droplets. Therefore, results from this test should be considered invalid.

EPA Reference Method 201A determines PM<sub>10</sub> concentration based on the separation of particles by a cyclone at a specific velocity. The PM present in the three sources is very lightweight, fibrous, and has a tendency to aggregate or "clump" together. The behavior of these fibers and clumps in the cyclone separator is unpredictable. One reasonable assumption is that, due to the shape of the particles, the surface area to mass ratio will be higher than an ideal spherical



particle. This particulate geometry has the potential to bias the mass collected on the filter. Due to the fibrous nature of the PM present, the  $PM_{10}$  results obtained by EPA Reference Method 201A from Nos. 2 and 3 Pulping Sidestream Vents should be regarded as suspect.

## 2.1 NO. 1 PULPING SIDESTREAM VENT

Tables 2.1-1 and 2.1-2 summarize the results of the PM emission testing performed during 13 December 1994 and 31 January - 2 February 1995 on the No. 1 Pulping Sidestream Vent. Table 2.1-3 presents the results of the  $PM_{10}$  emission testing performed on 14 December 1994.

Field and laboratory data are provided in Appendices B and E, respectively. Sample calculations are presented in Appendix F.

## Attachment 2(b)



Environmental  
Science &  
Engineering, Inc.

September 20, 1993

Ray Perry  
Buckeye Cellulose  
Chemicals Module  
Route 3  
PO Box 260  
Perry, FL 32347  
PH: (904)-584-0333  
FAX: (904)-584-9517

Dear Ray:

This letter is to document two observations concerning the  $PM_{10}$  tests ESE recently conducted for Stack #3 of the sidestream project at the Buckeye Cellulose, Perry, Florida facility.

The first observation is that the particulate matter was extremely lightweight and seemed to have an affinity for itself. Either the fibrous shape or static charge (or both) caused the particulate to aggregate and form clusters. In some cases, the clusters would dissociate and break apart on impact; however, the clusters would reform once enough of the material was present. This was evident in both the  $PM_{10}$  and "non- $PM_{10}$ " fractions of the sample. For this reason, we have some reservations about the representativeness of the measurements using this technique. It is difficult to assess what sort of bias this may have introduced, since an argument may be made in either direction.

The second observation is that the flows measured using the  $PM_{10}$  train were significantly higher in all cases than those measured during the Method 5 runs. This was due to the fact that the flow was somewhat stratified in the stack and the Method 201A ( $PM_{10}$ ) train uses fewer points. Since the flows measured from the  $PM_{10}$  train overestimated the emissions of  $PM_{10}$ , we chose to use these values in order to present the worst case for mass emission rates.

If you have any questions regarding these observations or if I may be of any other assistance, please do not hesitate to call me at (904)-333-6606.

Sincerely,

Bill Mayhew  
Chemical Engineer  
Manager, Source Testing

Attachment 2(c)

SOUTHERN REGIONAL CENTER  
P.O. Box 141020  
Gainesville, FL 32614-1020  
(904) 377-4708  
FAX: (904) 371-6557

NATIONAL COUNCIL OF THE PAPER INDUSTRY FOR AIR AND STREAM IMPROVEMENT, INC.

January 11, 1995

Mr. Ray Perry  
Buckeye Florida Limited Partnership  
Route 3, Box 260  
Perry, Florida 32347

Dear Ray:

I have reviewed the comments of Bill Mayhew of ESE regarding the PM<sub>10</sub> sampling conducted on the pulping side stream unit. Bill observed that the pulp fibers in the gas stream aggregated into clusters. I think that there is a significant potential for the fibers in these clusters to be reentrained into the gas stream and not be collected by the Method 201A cyclone. This would cause particles greater than 10  $\mu$ m diameter to be collected on the filter and erroneously counted as PM<sub>10</sub>. A different particle sizing device should be used in this application. I think that an impactor with greased collection plates would provide the best alternative. This is the type of collection device we used with good results in our study of workplace concentrations of paper dust.

If I can be of further assistance in this matter, please do not hesitate to contact me.

Sincerely,

  
David C. Rovell-Rixx  
Research Engineer

DCRR/kms

Attachment 2(d)

*Log 2*

---

EMISSION MEASUREMENT TECHNICAL INFORMATION CENTER  
TECHNICAL INFORMATION DOCUMENT

---

BACKGROUND

The methods for measuring PM<sub>10</sub> emissions, Methods 201 and 201A, were promulgated on April 17, 1990 (55 FR 14246). The Environmental Protection Agency (EPA) stated in the preamble that "The PM<sub>10</sub> methods are not recommended for stacks with entrained moisture droplets because water drops larger than PM<sub>10</sub>, which are captured by the PM<sub>10</sub> cyclone, may contain particles which normally would be counted as PM<sub>10</sub>."

Since promulgation, there have been many questions on how to measure PM<sub>10</sub> emissions in the presence of water droplets, such as after a wet scrubber.

RECOMMENDATION

Methods 201 and 201A are not applicable for in-stack PM<sub>10</sub> measurement in stack gases containing water droplets. Where water droplets are known to exist in the emissions and when PM<sub>10</sub> measurement is desired, EPA recommends that Method 5 (or a comparable method) be used and its particulate catch be considered as PM<sub>10</sub> emissions.



Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
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1.  Addressee's Address
2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Mr. C. S. Aiken, Plt. Mgr.  
 Buckeye Florida  
 Route 3, Box 260  
 Perry, FL 32347

4a. Article Number  
 Z 127 632 558

4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
 10-30-95

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

PS Form 3811, December 1991

U.S. GPO: 1993-352-714

**DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 127 632 558



**Receipt for Certified Mail**

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to	C.S. Aiken
Street and No.	Buckeye Fla.
P.O., State and ZIP Code	Perry, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	10-27-95
AD62-187788	

PS Form 3800, March 1993



# Department of Environmental Protection

Lawton Chiles  
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Virginia B. Wetherell  
Secretary

October 24, 1995

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Buckeye Florida  
Route 3, Box 260  
Perry, Florida 32347

Dear Mr. Aiken:

Re: No. 3 Recovery Boiler, AO 62-187788

The Department acknowledges receipt of your October 2, 1995, letter requesting an amendment to the referenced permit that would allow replacement of the two existing wet electrostatic precipitators (ESP) that are controlling the No. 3 Recovery Boiler with one dry ESP. The Department needs additional information to process this request. Please provide this office with the following:

1. The specifications on the existing and proposed ESP. Include the number of stages, velocity through the ESP, vertical height of the plates, horizontal length of the plates, collection area, treatment time, primary voltage, primary current, secondary voltage, secondary current, and spark rate.
2. A copy of the current permit to operate Recovery Boiler No. 3.
3. A copy of the most recent permit to construct (modify) Recovery Boiler No. 3.

The Department will resume processing your request after receipt of this information. If you have any questions on this matter, please write to me or call Willard Hanks at (904)488-1344.

Sincerely,

A. A. Linero, P.E.  
Administrator  
New Source Review Section

AAL/wh/t

cc: D. Buff, KBN



Wald 15

# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

October 24, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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Route 3, Box 260  
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Dear Mr. Aiken:

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Sincerely,

A. A. Linero, P.E.  
Administrator  
New Source Review Section

AAL/wh/t

cc: D. Buff, KBN



# Buckeye Florida

Route 3, Box 260 • Perry, Florida 32347  
Telephone: (904) 584-1121

**RECEIVED**

NOV 03 1995

BUREAU OF  
AIR REGULATION

November 1, 1995

Mr. A. A. Linero, P.E.  
Administrator, New Source Review Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Buckeye Florida, Limited Partnership  
Permit: AO62-187788; Source ID: 31JAX62000107  
No. 3 Recovery Boiler

Dear Mr. Linero:

In response to your letter dated October 24, 1995, we are submitting supplemental information on the existing electrostatic precipitators and the proposed electrostatic precipitator (ESP). We have enclosed copies of the current operation permit, the most recent construction permits, and supplemental design information for the ESP's. We have included page 32 of 36 from our ESP Specification as well as pages 3:1 and 3:2 of the final proposal from Environmental Elements Corporation with whom we have contracted to supply the new ESP. We hope that this supplemental information is sufficient to meet the Departments needs. If you have any questions or need more information, please call Ray Perry at (904)-584-1333.

Sincerely,

BUCKEYE FLORIDA, LIMITED PARTNERSHIP

Bruce Harding  
Environmental Control Manager

CC:  
David Buff, P.E. , KBN



### Buckeye Florida; #3 Recovery Boiler ESP Design Data

Manufacturer	Koppers	Research-Cottrell	PROPOSED ESP <sup>1</sup>	PROPOSED ESP <sup>1</sup>
Unit Identifier	#3A ESP	#3B ESP	Expected Performance <sup>2</sup>	Guaranteed Performance <sup>3</sup>
<b>Plate Data:</b>				
Total Area {square feet}	25,056	40,608	64,260	64,260
Plate Width {feet}	9	9	10.6	10.6
Plate Height {feet}	24	24	28	28
<b>Chambers</b>				
Chambers	2	2	2	2
Fields	2	2	3	3
SCA {sq. ft./1000 ACFM}	167.9	203.0	306	273.4
Electrode Design	weighted wire	weighted wire	rigid electrode	rigid electrode
T-R Sets	2	2	3	3
<b>Gas Data:</b>				
Volume {ACFM}	149,200	200,000	210,000	235,000
Temperature {°F}	300	300	325	375
Moisture Content	30%	30%	35%	35%
Inlet Loading	4 gr/dscf	0.6 gr/dscf	3.0 gr/acf	3.0 gr/acf
Outlet Loading {gr/dscf}	ND	0.055	0.020	0.044
Superficial Velocity {feet/sec}	4.4	4	3.5	3.9
Retention Time {seconds}	4.05	4.5	9.2	8.2
Secondary Voltage {kVolts}	45	45	55	55

**FOOTNOTES:**

- 1 = Proposed ESP by Environmental Elements Corporation (ENELCO)
- 2 = Expected performance at normal volumetric flow of 210,000 ACFM
- 3 = Guaranteed performance at Design volumetric flow of 235,000 ACFM

## #3 ESP Specification

determination that the equipment has passed the performance test is delayed, the amount outstanding on the contract price, if any, shall be subject to a per diem interest charge at the maximum rate allowed by law, chargeable from the time the equipment would have passed the performance test but for said fault.

- 6.1.8. Seller shall have the right to make, at its own expense, any adjustments, changes, or additions to the equipment in an endeavor to obtain performance in accordance with the guarantee. After such adjustments, changes or addition, a 90 day 'hands off' period shall be observed with only routine maintenance applied before any performance test will be conducted.

### 6.2 Guarantees

- 6.2.1. Vendor shall provide a one year warranty from the date of equipment start-up on materials and workmanship for the entire ESP system furnished, but not to exceed 18 months after the equipment is ready to operate.
- 6.2.2. Vendor shall guarantee the outlet grain loading of the precipitator will not exceed 0.044 grains per dry standard cubic foot corrected to 8% oxygen at the design conditions described in 4.2. In addition the vendor shall guarantee a performance curve of outlet grain loading (gr/sdcf @ 8% oxygen) vs. actual cubic feet of flue gas flow for a gas flow of 70% to 120% of design.
- 6.2.3. Vendor shall guarantee the opacity due to particulate at the outlet of the stack will not exceed 35% at the design conditions described in 4.2. In addition the vendor shall guarantee a performance curve of opacity at the outlet of the stack vs. actual cubic feet of flue gas flow for a gas flow of 70% to 120% of design.
- 6.2.4. Vendor shall guarantee the pressure drop from inlet of the I.D. fan to the outlet of the cascade evaporator shall not exceed 3.0 inches of water at the design conditions described in 4.2. If pressure drop cannot be verified at design conditions, measured pressure drop corrected for flow and temperature differences shall be used for verification.

## 7. Miscellaneous

### 7.1. Schedule

### 3 - TECHNICAL TABULATION

All inlet dust loadings are at 2.5% O<sub>2</sub> in the flue gas.

All outlet dust loadings are at 8% O<sub>2</sub> in the flue gas.

All gas volumes are based on pitot tube measurements.

#### A. OPERATING CONDITIONS

##### 1. Operating Conditions at Precipitator Inlet

a)	Volume	235,000 ACFM at 100% MCR
b)	Temperature	325-370 °F
c)	Pressure	-3 to -10 inch W.C.
d)	Salt Cake Load	3.0 GR/ACF
e)	Water Vapor Content	35 % by Volume (+ - 1%)

##### 2. Guaranteed Performance at Operating Conditions - (Two Chamber Operation)

a)	Gas Volume Per Chamber x 2 for Total	117,250 ACFM
b)	Guaranteed Efficiency	99.14 % at inlet load of 3.0 GR/ACF or more (0.044 gr/dscf)
c)	Pressure Drop	3.0 inch from cascade outlet to induced fan inlet
d)	Gas Velocity	3.89 FPS
e)	Time of Treatment	8.2 seconds
f)	SCA	273.4

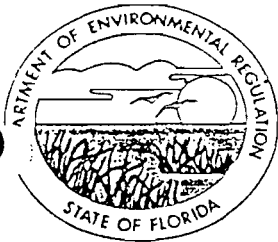
3. Expected Performance at Operating Conditions - (Two Chamber Operation)

a)	Gas Volume per Chamber	105,000 ACFM
b)	Guaranteed Efficiency	99.41% at inlet load of 2.0 GR/ACF or more
c)	Guaranteed Residual	0.020 GR/SCFD at inlet load of 2.0 GR/ACF or less
d)	Pressure Drop	3.0 inch from cascade outlet to induced draft fan inlet
e)	Gas Velocity	3.47 FPS
f)	Time of Treatment	9.18 seconds
g)	SCA	306

## B. MECHANICAL DESIGN DATA

1.	Arrangement	Top inlet, Top outlet
2.	No. Chambers	2
3.	No. Bays Wide/Chamber	1
4.	No. plates in direction of gas flow	3
5.	Gas Passages	18 /chamber
6.	Spacing of Gas Passages	12 inches
7.	Precipitator Casing Dimensions	See Drawing 14511-1410-S-1
8.	Casing Material	
	(a) Inner Shell	1/4 inch A-36 plate
	(b) Outer Shell	3/16 inch A-36 plate
9.	Partition Material	Two 1/4 inch A-36 plates with 12 inch insulation





*Florida Department of Environmental Regulation*

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

April 22, 1993

Mr. C.S. Aiken, Plant Manager  
Buckeye Florida, Limited Partnership  
Post Office Box 260  
Perry, Florida 32347

Dear Mr. Aiken:

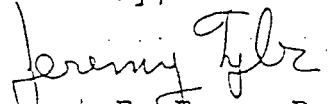
Taylor County - AP  
Buckeye Florida, Limited Partnership  
No. 3 Recovery Boiler  
No. 3 Smelt Dissolving Tank  
Permit No. AO62-187788  
ID#31JAX62000107,22

The transfer of permit application received 01-27-93 and the confirmation of sale received 03-17-93 are approved.

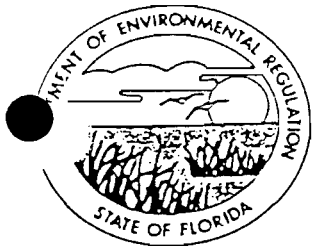
The referenced permit is transferred to Buckeye Florida, Limited Partnership, effective 03-16-93 and is not changed otherwise.

This letter and the above documents shall become a part of the permit.

Sincerely,

  
Ernest E. Frey, P.E.  
Director of District Management

EEF: ~~EF~~:JC:bt



# Florida Department of Environmental Regulation

Northeast District • Suite 200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577 • 904-448-4300

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary  
Ernest Frey, Deputy Assistant Secretary

PERMITTEE:

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

I.D. Number: 31JAX62000107&22  
Permit/Cert Number: A062-187788  
Date of Issue: 01-04-91  
Expiration Date: January 17, 1996  
County: Taylor  
Latitude/Longitude: 30°03'59"N; 83°33'12"W  
Project: #3 Recovery Boiler &  
SDT  
UTM: E-(17)256.7; N-3328.7

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of:

- EP# 07 No. 3 Recovery Boiler (RB) with particulate matter (PM) controlled by 3A electrostatic precipitator (ESP) and 3B ESP. Total reduced sulfur (TRS) compounds are reduced by a two-stage heavy black liquor oxidation system (P & G/Rust Engineering Design).
- EP# 22 No. 3 Smelt Dissolving Tank (SDT) with a new monitoring system for the existing scrubber system (Ducon 22-4-0400).

Located east of U.S. 19, on S.R. 30, south of U.S. 27, southeast of Perry, Taylor County, Florida.

In accordance with:

Application dated 09-25-85  
Additional information received 12-19-85  
Additional information received 03-20-86  
Additional information received 04-14-86  
SDT construction application dated 11-11-87  
Construction permit issued 05-27-88 with nine (9) attachments  
Certificate of Completion of Construction dated 06-08-89  
Revised June 6 letter dated 06-27-89  
Application received 10-12-90

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

I.D. Number: 31JAX62000107&22  
Permit/Cert: A062-187788  
Date of Issue:  
Expiration Date: January 17, 1996

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, or representatives.
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. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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 at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

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

I.D. Number: 31JAX62000107&22  
Permit/Cert: A062-187788  
Date of Issue:  
Expiration Date: January 17, 1996

GENERAL CONDITIONS:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the department with the following information:
  - a. A description of and cause of non-compliance; and
  - b. the period of non-compliance, including exact 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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
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 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

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

I.D. Number: 31JAX62000107&22  
Permit/Cert: A062-187788  
Date of Issue:  
Expiration Date: January 17, 1996

GENERAL CONDITIONS:

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Certification of Compliance with State Water Quality Standards
- ( ) (Section 401, PL 92-500)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall, within a reasonable period of 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 submitted or corrected promptly.



# Florida Department of Environmental Protection

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7577

Lawton Chiles  
Governor

Virginia B. Wetherell  
Secretary

CERTIFIED - RETURN RECEIPT

September 22, 1993

Mr. Charles S. Aiken, Plant Manager  
Buckeye Florida, Limited Partnership  
Rt. 3, Box 260  
Perry, Florida 32347

Dear Mr. Aiken:

Taylor County - AP  
Buckeye Florida, Limited Partnership  
No. 3 Recovery Boiler  
No. 3 Smelt Dissolving Tank  
ID#31JAX62000107 & 22  
AO62-187788  
Minor Modification

The Minor Modification request received June 10, 1993, is approved to address the use of natural gas and No. 2 fuel oil as fuel igniters.

Specific Condition No. 1 is hereby modified as per attachment.

This letter and the request shall become a part of the referenced permit.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by filing 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.

If you have any questions concerning this matter, please contact Rita Felton at (904) 448-4310, Extension 370.

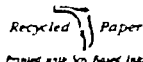
Sincerely,

Ernest E. Frey, P.E.  
Director of District Management

EEF: <sup>AE</sup>RP:bt *RL*

Attachment

Administration 448-4300  
Air 448-4310  
Waste Management 448-4320



Water Facilities 448-4330  
Water Management 448-4340  
FAX 448-4366

PERMITTEE:  
Buckeye Florida, Ltd. Partnership  
Rt. 3, Box 260  
Perry, Florida 32347

I.D. Number 31JAX62000107&22  
Permit/Cert: AO62-187788  
Date of Issue:  
REVISED: September 22, 1993  
Expiration Date: January 17, 1996

1. The maximum input rate (operating rate) is as listed below and shall not be exceeded without prior approval:

RATE	Material	To
82,350 lbs/hr	BLS <sup>1</sup>	RB
34,752 lbs/hr	Smelt	SDT
8,246 lbs/hr	WWS <sup>2</sup>	SDT
---	Natural gas <sup>3,4</sup>	RB
---	#2 FO <sup>3,4,5,6</sup>	RB

<sup>1</sup>BLS - black liquor solids

<sup>2</sup>WWS - weak wash solids

<sup>3</sup>Include an estimate of the quantity fired in the AOR

<sup>4</sup>Used as a pilot fuel during startups, shutdowns, malfunctions and for dry out fires after a water wash

<sup>5</sup>Used as a defoaming agent for the black liquor systems

<sup>6</sup>Usage shall be less than 50,000 gallons per year unless otherwise requested

June 7, 1993



## Buckeye Florida

Route 3, Box 260 • Perry, Florida 32347 • Telephone: (904) 584-0121

Mr. John L. Cole  
Air Permitting Engineer  
Florida Department of  
Environmental Regulation  
Suite B-200  
7825 Baymeadows Way  
Jacksonville, FL 32256-7577

RE: Minor Modification to Permits; Fuel Igniters  
Facility ID: 31JAX620001

Dear Mr. Cole:

We have reviewed the use of igniters for all of our permitted sources. Fuel igniters are mainly used during startups, shutdowns, and malfunctions on all of our fuel burning sources. However, the use of igniters is not specifically addressed in our current operating permits. Since they are a necessary part of our operation, we ask that the Department make a minor modification to the affected permits to address the use of igniters.

No. 6 fuel oil is the primary fuel used during boiler startups, shutdowns, and malfunctions. Due to the characteristics of No. 6 fuel oil, a pilot fuel is required to provide ignition. Small amounts of natural gas or No. 2 fuel oil are commonly used for this purpose. In effect, they are used as pilots for the No. 6 fuel oil burners.

The burner pilots are also used for another purpose. They are used to dry out a boiler following a water wash. This is necessary to prevent boiler tube corrosion during an extended maintenance outage. The burner pilots are used for this function because they provide adequate heat and no ash deposits.

No. 2 fuel oil has another specific use in the recovery boilers. It is sometimes used as a defoaming agent for the direct contact evaporators and the mix tanks. A small amount may be added to the black liquor at these two points during upsets. The amount of No. 2 fuel oil added is extremely small in comparison to the volume of black liquor.

A list of the affected permits is attached. If you have any questions or require additional information, please contact Ray Perry at 904-584-0576.

Sincerely,

BUCKEYE FLORIDA, LIMITED PARTNERSHIP

Bruce Harding  
Environmental Control Manager



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

I.D. Number: 31JAX62000107&22  
Permit/Cert: A062-187788  
Date of Issue:  
Expiration Date: January 17, 1996

SPECIFIC CONDITIONS:

SC #4 Continued

<sup>7</sup>Note: 6-min. avg.

<sup>8</sup>Note: Up to 60% for one 6-min. period per hr.

<sup>9</sup>Basis: P = 21.50 TPH

<sup>10</sup>Basis: 0.0480 lb as H<sub>2</sub>S per 3000 lbs. BLS; 82,350 lbs. BLS per hr.

5. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 14 days prior to testing, and submit the test report documentation to the Department with the operation permit application within 45 days after completion of the testing:

<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
From RB:		
PM	12 Months from 04-15-90	EPA 5
TRS	See Specific Condition #7	---
VE <sup>1</sup>	12 Months from 04-15-90	DER 9
From SDT:		
PM	12 Months from 04-15-90	EPA 5 <sup>2</sup>
TRS <sup>3</sup>	5 Years from 04-15-90 <sup>4,5</sup>	EPA 16 or 16A
VE	See Specific Condition #9	---

Tests and test reports shall comply with the requirements of Florida Administrative Code Rule 17-2.700(6) and (7), respectively.

<sup>1</sup>The observation (VE) shall be recorded during one of the PM test runs. In the event that weather (humidity, wind, etc.) prevents a VE test as described above all operation parameters shall be recorded that are necessary to duplicate a similar stack gas plume during the earliest good (clear, etc.) weather after the PM test so that a VE test can be performed. The test shall be reported with the PM test or give an explanation why it is not included.

<sup>2</sup>Basis: from CP #AC62-141925

<sup>3</sup>Surrogate parameter and reporting (See Specific Condition #8)

<sup>4</sup>Per 17-2.700(2)(a)3.

<sup>5</sup>Or on request

6. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
7. The TRS from this RB shall be monitored continuously as required by FAC Rule 17-2.710(3). The TRS continuous monitoring system (CMS) report shall meet all the requirements of FAC Rule 17-2.710(4).

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

I.D. Number: 31JAX62000107&22  
 Permit/Cert: A062-187788  
 Date of Issue:  
 Expiration Date: January 17, 1996

SPECIFIC CONDITIONS:

1. The maximum input rate (operating rate) is as listed below and shall not be exceeded without prior approval.

<u>Rate</u>	<u>Material</u>	<u>To</u>
82,350 lbs/hr	BLS <sup>1</sup>	RB
34,752 lbs/hr	smelt	SDT
8,246 lbs/hr	WWS <sup>2</sup>	SDT

<sup>1</sup>BLS - black liquor solids

<sup>2</sup>WWS - weak wash solids

2. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition (SC) No. 1, or SC No. 3 will become effective.
3. The operating rate shall not exceed 110% of the operating rate during the most recent test except for testing purposes, but shall not exceed the rate in SC No. 1. After testing at an operating rate greater than 110% of the last test operating rate, the operating rate shall not exceed 110% of the last (submitted) test operating rate until the test report at the higher rate has been reviewed and accepted by the Department.
4. The permitted maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>lbs/hr</u>	<u>TPY</u>
From RB (#07):			
PM <sup>1</sup>	17-2.600(4)(b)1.	82.35 <sup>2</sup>	360.69 <sup>3</sup>
TRS <sup>4</sup>	17-2.600(4)(c)3.a.(i)	11.05 <sup>5</sup>	48.28 <sup>3</sup>
VE <sup>6</sup>	17-2.600(4)(a)1.	45% opacity <sup>7</sup>	
VE	17-2.600(4)(a)1.a.	60% opacity <sup>8</sup>	
From SDT (#22):			
PM	17-2.610(1)(b)	24.05 <sup>9</sup>	105.34 <sup>3</sup>
TRS	17-2.610(4)(c)4.a.	1.32 <sup>10</sup>	5.78 <sup>3</sup>
VE	See Specific Cond. #9	---	

<sup>1</sup>PM - particulate matter

<sup>2</sup>Basis: 3 lbs per 3000 lbs. BLS; 82,350 lbs. BLS per hr.

<sup>3</sup>Basis: 8760 H/Y; operation time shall be recorded.

<sup>4</sup>TRS - total reduced sulfur.

<sup>5</sup>Basis: 17.5 ppm (vol), dry, standard conditions, 8% O<sub>2</sub> corr. as 12-hr. avg; 7% O<sub>2</sub>; 37.4% H<sub>2</sub>O(v); 320°F; 263,513 ACFM

<sup>6</sup>VE - visible emissions

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

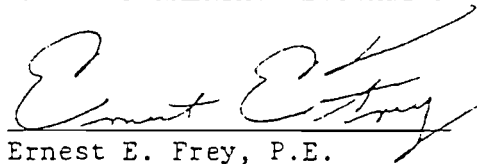
I.D. Number: 31JAX62000107&22  
Permit/Cert: A062-187788  
Date of Issue:  
Expiration Date: January 17, 1996

SPECIFIC CONDITIONS:

8. SDT continuous monitoring requirement is met by establishing the surrogate parameter of 51 gpm, minimum 12-hr avg., of weak wash flow rate to the scrubber per FAC Rule 17-2.710(3)(d). The surrogate parameter flow rate shall be monitored continuously and reported as required by FAC Rule 17-2.710(4).
9. Due to moisture interference, the visible emission limiting standard pursuant to FAC Rule 17-2.610(2) is not applicable and is deferred to FAC Rule 17-2.600(4)(a). However, if the Department observes visible emissions in excess of 20% opacity pursuant to FAC Rule 17-2.700(6)(b)9, it shall be considered good reason to believe that the applicable mass emission standard is in danger of being violated. The permittee shall be required to run a special compliance test in accordance with FAC Rule 17-2.700(2)(b). Such test shall be conducted within 14 days after the Department has notified the permittee of the applicability of this permit condition.
10. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).
11. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
12. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to the DER Division of Air Resources Management and Northeast District.
13. The ID Number and ID Name for this source is to be used on all correspondences.
14. Forms for the renewal will be sent 5 months prior to 01-17-96 and the completed forms with test results are due 90 days prior to 01-17-96.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Ernest E. Frey, P.E.

Deputy Assistant Secretary  
FILING AND ACKNOWLEDGEMENT

FILED on this date pursuant to S120.52 Florida  
Statutes, with the designated Department Clerk,  
receipt of which is hereby acknowledged.

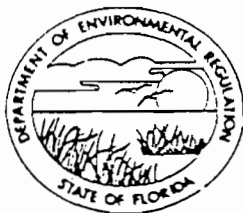
Debra D. Brown 1-4-91  
Clerk Date

DEPARTMENT OF ENVIRONMENTAL REGULATION

BOB GRAHAM GOVERNOR  
VICTORIA J. TSCHINKEL SECRETARY  
ERNEST E. FREY DISTRICT MANAGER

NORTHEAST DISTRICT

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



APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New<sup>1</sup> [X] Existing<sup>1</sup>

APPLICATION TYPE: [ ] Construction [X] 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 #3 Recovery Boiler & Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Smelt Dissolving Tank

SOURCE LOCATION: Street 5-6 miles southeast of Perry, FL 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 P&G Cellulose Company

I certify that the statements made in this application for an operation 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 permit establishment.

\*Attach letter of authorization

Signed: C. S. Aiken

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

Date: 10/2/90 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 this 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 George F. Nevin

George F. Nevin

Name (Please Type)

Watkins Engineers & Constructors

Company Name (Please Type)

P. O. Box 2194, Tallahassee, FL 32304

Mailing Address (Please Type)

Florida Registration No. 8341 Date: 9/24/90 Telephone No. (904) 576-7181

#### 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.

Not Applicable

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

Start of Construction N/A Completion of Construction N/A

- 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.)

Not Applicable

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

A062-2092 issued May 18, 1973 expires July 1, 1975

A062-2221 & AC62-2222 issued May 15, 1974 expires July 1, 1975

A062-2578 issued July 14, 1976 expires February 28, 1981

DER Form 17-1.202(1) A062-110326 issued 1/17/86 expires 1/17/91  
Effective October 31, 1982 Page 2 of 12

A062-37217 issued February 10, 1981 expires January 31, 1986

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

F. If this is a new source or major modification, answer the following questions.  
(Yes or No) Not Applicable - Renewal Application

- |   |            |
|---|------------|
| 1. Is this source in a non-attainment area for a particular pollutant?  | <u>No</u>  |
| a. If yes, has "offset" been applied?   | <u>N/A</u> |
| b. If yes, has "Lowest Achievable Emission Rate" been applied?  | <u>N/A</u> |
| c. If yes, list non-attainment pollutants.  | <u>N/A</u> |
| 2. Does best available control technology (BACT) apply to this source?<br>If yes, see Section VI.                                       | <u>N/A</u> |
| 3. Does the State "Prevention of Significant Deterioration" (PSD)<br>requirement apply to this source? If yes, see Sections VI and VII. | <u>N/A</u> |
| 4. Do "Standards of Performance for New Stationary Sources" (NSPS)<br>apply to this source?   | <u>N/A</u> |
| 5. Do "National Emission Standards for Hazardous Air Pollutants"<br>(NESHAP) apply to this source?                                      | <u>N/A</u> |

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply  
to this source? N/A
- a. If yes, for what pollutants? \_\_\_\_\_
- 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:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Black Liquor Flow			82,350 BLS	Vent 10-5
Smelt to SDT			34,752	Vent 10-1
Weak Wash Solids			8,246	Vent 10-1
to SDT				

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

1. Total Process Input Rate (lbs/hr): 82,350 lbs/hr BLS + 8,246 lbs/hr weak wash solids

2. Product Weight (lbs/hr): 243,000 lbs/hr as steam / 34,752 lbs/hr as smelt

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

Name of Contaminant	* Emission <sup>1</sup>		Allowed 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	
RB Part.	38.1	167	.600(4)(b)1.	80.0	NA		Vent 10-5
TRS	NA	NA	.600(4)(c)3.a.(i)	17.5 ppm	NA		Vent 10-5
VE			.600(4)(a)1.	45%	NA		Vent 10-5
SDT Part.	5.0	22	.610(1)(b)	21.37	NA		Vent 10-1
TRS			.600(4)(c)4.a.		NA		Vent 10-1

<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).

\* Data from attached compliance tests.

Maximum Permit Allowable: ESP 82.35 lbs/hr

SDT 24.05 lbs/hr

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)
3A Precipitator	Saltcake	92.0%		Design
Koppers #S0372376				
3B Precipitator	Saltcake	93.7%		Design
Research-Cottrell #1913-22-4-0450				
SDT Wet Scrubber				
Ducon #22-4-0400		95.0%		Design

BLO System/P&G/Rust Engineering Design/Two stage heavy black liquor system  
E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
#6 Fuel Oil	124 gal/hr	2,800 gal/hr	406 MM BTU/hr
Black Liquor Solids	80,000 lbs/hr	82,350 lbs/hr	478 MM BTU/hr

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

Fuel Analysis: #6 Fuel Oil

Percent Sulfur: Maximum 2.5% Percent Ash: 0.1 Typical

Density: 8.1 lbs/gal Typical Percent Nitrogen: 0.4 bases on 1 rest

Heat Capacity: 17,901 BTU/lb 145,000 BTU/gal

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

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

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

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

No wastes are generated during boiler operation. Boiler washouts are recycled through evaporation and recovery until washout is clean enough to discharge to NPDES treatment  
This discharge is not quantified.



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

Stack Height: 225/140 ft. Stack Diameter: 9/4 ft.  
 Gas Flow Rate: 240,000/ ACFM 101,000/ DSCFM Gas Exit Temperature: 330/165 °F.  
 Water Vapor Content: 21,800 35/35 12,000 % Velocity: 69/28 FPS

SECTION IV: INCINERATOR INFORMATION  
 NOT APPLICABLE

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)]
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.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
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.)
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).
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.
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).
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**  
NOT APPLICABLE

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

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.      b. Diameter: ft.
- c. Flow Rate: ACFM      d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- 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:

2.

- 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:

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

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

- 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

NOT APPLICABLE

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).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent?  Yes  No
- b. Was instrumentation calibrated in accordance with Department procedures?  
 Yes  No  Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. \_\_\_\_\_ Year(s) of data from \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year
- 2. Surface data obtained from (location) \_\_\_\_\_
- 3. Upper air (mixing height) data obtained from (location) \_\_\_\_\_
- 4. Stability wind rose (STAR) data obtained from (location) \_\_\_\_\_

C. Computer Models Used

- 1. \_\_\_\_\_ Modified? If yes, attach description.
- 2. \_\_\_\_\_ Modified? If yes, attach description.
- 3. \_\_\_\_\_ Modified? If yes, attach description.
- 4. \_\_\_\_\_ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

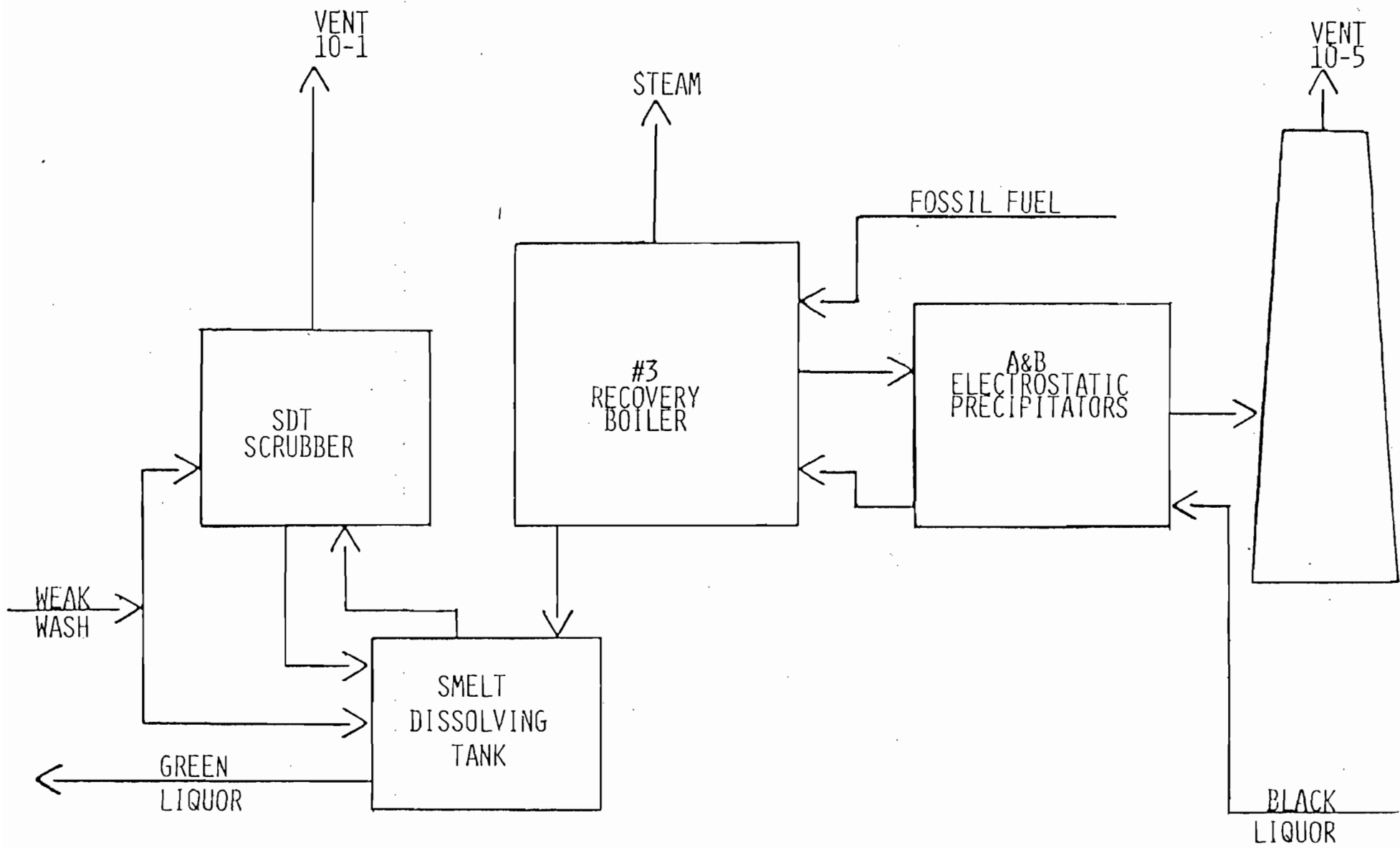
D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO <sub>2</sub>	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions and normal operating time.

- F. Attach all other information supportive to the PSD review.
- G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.
- H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.



#3 RECOVERY BOILER



STATE OF FLORIDA  
DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR The Buckeye Cellulose Corp.  
Perry, Florida 32347

PERMIT NO. AC62-2221

DATE May 15, 1974

PURSUANT TO THE PROVISION OF SECTION 403.061 (16) OF CHAPTER 403, FLORIDA STATUTES, AND CHAPTER 17-4, FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:  
F. P. Smith, Plant Manager

FOR THE CONSTRUCTION OF:

No. 3 Recovery Boiler with Second Electrostatic Precipitator in Series  
to Control Particulate Emissions.

LOCATED AT: 5 to 6 miles Southeast of Perry, Taylor County, Florida

UTM: NE-7256740 N-3328700

IN ACCORDANCE WITH THE APPLICATION DATED April 15, 1974

AND IN CONFORMITY WITH THE STATEMENTS AND SUPPORTING DATA ENTERED THEREIN, ALL OF WHICH ARE FILED WITH THE DEPARTMENT AND ARE CONSIDERED A PART OF THIS PERMIT.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ITS ISSUANCE UNTIL July 1, 1975 AND SHALL BE SUBJECT TO ALL APPLICABLE LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.

*Frank W. Watkins, Jr.*

Frank Watkins, Jr.  
Regional Engineer

STATE OF FLORIDA

DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC62-2221

Date: 5-15-74

- [X] 1. Construction of this installation shall be completed by  
May 15, 1975
- [X] 2. This construction permit expires on July 1, 1975 following  
an initial period of operation for appropriate testing to deter-  
mine compliance with the Rules of the Florida Pollution Control  
Board.
- [X] 3. All applicable rules of the Department including design discharge  
limitations specified in the application shall be adhered to. The  
permit holder may also need to comply with county, municipal,  
federal, or other state regulations prior to construction.
- [X] 4. The applicant shall continue the retention of the engineer of  
record for the inspection of the construction of this project.  
Upon completion the engineer shall inspect for conformity to con-  
struction permit applications and associated documents. A report  
of such inspection shall be submitted by the engineer to the  
Department of Pollution Control for consideration toward the  
issuance of an operation permit.
- [X] 5. This #3 Recovery Boiler shall be tested for particulates and TRS  
within 60 days after  
it is placed in operation. These test results are required prior  
to our issuance of an operation permit and shall be submitted  
in duplicate to the DPC Northeast Florida Regional  
Office 3426 Bills Road, Jacksonville, FL 32207
- [ ] 6. The operation of this installation shall be observed for visible  
emissions in accordance with Method 9 -- Visible Determination of  
the Opacity of Emissions from Stationary Sources (Federal Register,  
December 23, 1971). The observation results are required prior  
to our issuance of an operation permit, and shall be submitted in  
duplicate to the DPC                                  Florida Regional Office,
- [ ] 7. Stack sampling for total particulate or other contaminant emissions  
shall be conducted if found by the DPC                                  Florida Regional  
Office to be necessary as a basis for the issuance of an operation  
permit.
- [X] 8. Satisfactory ladders, platforms, and other safety devices shall be  
provided/~~available~~ as well as necessary ports to facilitate the  
carrying out of an adequate sampling program.

(TURN OVER)



STATE OF FLORIDA  
DEPARTMENT OF POLLUTION CONTROL

APPLICATION TO OPERATE/CONSTRUCT POLLUTION SOURCES

SECTION I - GENERAL INFORMATION FOR ALL POLLUTION SOURCES  
I TO BE FILLED IN BY APPLICANT

Source Type: Air Pollution  
Type application: [ ] Operation [ ] Temporary Operation  Construction  
Status Source: [ ] New  Existing [ ] Modification

Source Name: The Buckeye Cellulose Corporation County: Taylor

Source Location: Street: 5 to 6 miles southeast of Perry City: Perry  
(Water Source Only) Lat: \_\_\_\_\_ Long: \_\_\_\_\_  
(Air Source Only) UTM: East 256,740 North 3,328,700

Appl. Name and Title: F. P. Smith, Plant Manager  
Appl. Address: Perry, Florida 32347

II TO BE FILLED IN BY REGION (\*BY BUREAU OF PERMITTING)

Control No: Region \_\_\_\_\_ County \_\_\_\_\_ Type \_\_\_\_\_ \*Project \_\_\_\_\_

Type Permit	Date Rec'd	*Permit No.	*Issue Date	*Compl. Date	*Exp. Date

Source Description: No. 3 Recovery Boiler Operating Permit No. A0-62-2092  
Control Equipment: Electrostatic Precipitator (Two units in series - one new; one existing)

Water Permits

Receiving Body Code: \_\_\_\_\_ Surface Water Code: \_\_\_\_\_  
Station No.: Influent: \_\_\_\_\_ Effluent: \_\_\_\_\_

Effluent:	Average	Design	% Reduction
Flow rate, MGD	_____	_____	_____
BOD, lbs/day	_____	_____	_____
Susp. Sol., lbs/day	_____	_____	_____
Other: _____	_____	_____	_____

Air Permits

Operating Time:  Continuous [ ] Intermittent  
Fuel: Type Fossil Fuel & Black Liquor M-BTU/hr. In Put 482  
Incinerator: Capacity, tons/day \_\_\_\_\_ Type Waste \_\_\_\_\_  
Mfg. & Model \_\_\_\_\_

Pollutant Emissions, lbs/day	Actual	Design	Allowable
Particulate From Precipitator	_____	815	1735
Sulfur Oxides Est. 2200 lb/day	_____	N/A	N/A
Other TRS as H <sub>2</sub> S (Dry) Boiler	_____	175	219
NO <sub>x</sub> Est. 2150 lb/day	_____	N/A	N/A

Implementation: Estimated Appl. Filing Date January 1974

DESCRIPTION OF PROPOSED PROJECT

A. Describe the nature and extent of the proposed project. Refer to existing pollution control facilities, DPC permits, conditions, orders and notices, expected improvement in performance of the facilities and state whether the proposed project will result in full compliance of the source. Attach additional sheet if necessary.

The existing No. 3 kraft recovery boiler has an electrostatic precipitator on the flue gas removing approximately 92% of the salt cake particulate. It is proposed to add a second precipitator in series with this unit to achieve an overall efficiency designed to meet the state air pollution requirements.

B. Schedule of Project Covered in this Application (Construction Permit Application Only).

Federally or State Financed Projects only:

Planning Complete Not Applicable

Financing Program Complete

Indicate other local, state and/or federal agency approvals and dates

All projects:

Start of Construction July, 1971

Completion of Construction July, 1975

C. Costs of Construction (Show a breakdown of costs for individual components/units of the proposed project serving pollution control purpose only). Information on actual costs shall be furnished with the application for operation permit.

\$1,450,000 cost for second precipitator

D. Indicate any previous DPC permits, issuance dates, and expiration dates.

First time applied for this construction permit

Boiler Operating Permit filed January 6, 1971

Boiler Operating Permit issued May 18, 1973; expires July 1, 1975

## AIR POLLUTION SOURCES & CONTROL DEVICES

**A. Identification of Air Contaminants**

- 1)  Particulates
  - a)  Dust
  - b)  Fly Ash
  - c)  Smoke
  - d)  Other (Identify)
- 2)  Sulfur Compounds
  - a)  SO<sub>x</sub> as SO<sub>2</sub>
  - b)  Reduced Sulfur as H<sub>2</sub>S
  - c)  Other (Identify)
- 3)  Nitrogen Compounds
  - a)  NO<sub>x</sub> as NO<sub>2</sub>
  - b)  NH<sub>3</sub>
  - c)  Other (Identify)
- 4)  Fluorides
- 5)  Acid Mist
- 6)  Odor
- 7)  Hydrocarbons
- 8)  Volatile Organic Compounds
- 9)  Other (Specify): \_\_\_\_\_

**B. Raw Materials and Chemicals Used (Be Specific)**

Description	Utilization Tons/day, lbs./day, etc.	Approximate Contaminant Content		Relate to Flow Diagram
		Type	% Wt.	
Black Liquor Solids	1,650,000			Vent #10-5

**C. Process Weight:**

- 1) Total Process Weight Rate     \*\*     lbs./hr. [See Sec. 17-2.04(2)]
- 2) Product Weight 285,000 lb./hr. expressed as Steam
- 3) Normal Operating Time 24 hr/day, 7 day/week, if seasonal describe: 50 weeks/year

**D. Airborne Contaminants Discharged:**

Name of Contaminant	Actual Discharge	Discharge Criteria*	Allowable Discharge*	Relate Location to Flow Diagram
Particulate Boiler	Est. 815 lb/day	3 lb/3000 lb BLS	1735 lb/day	Vent #10-5
TRS as H <sub>2</sub> S (Dry) Boiler	Est. 175 lb/day	17.5 PPM	219 lb/day	Vent #10-5
SO <sub>2</sub>	Est. 2200 lb/day	N/A	N/A	N/A
NO <sub>x</sub>	Est. 2150 lb/day	N/A	N/A	N/A

\* Refer to Chapter 17-2 Florida Administrative Code  
(Discharge Criteria: Process Weight Rate, #/tonP<sub>2</sub>O<sub>5</sub>, #/M BTU/hr etc.)

E. Control Devices:

Name	Eff.	Conditions of Operation, Particle Size Range, etc.	Relate to Flow Diagram
Existing Precipitator	92.0		Vent #10-5
New Precipitator (in series)	93.7		Vent #10-5

F. Fuels:

Type (Be specific)	Daily Consumption	Heat Input BTU/hr.	Relate to Flow Diagram
Fossil Fuel (2.4% S)	5,700	$35.4 \times 10^6$	Vent #10-5
Black Licuor Solids	1,650,000	$447 \times 10^6$	Vent #10-5

G. Describe briefly, without revealing trade secrets, the unit processes/operations generating the airborne emissions identified in this application:

Black licuor solids when burned in recovery boiler generate TRS as H<sub>2</sub>S and salt cake particulate.

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

No Wastes

Allowable Emissions

Particulate from Precipitators

Black Liquor 3 lb/3000 lb Black Liquor solids fired  
 Fossil fuel 0.1 lb/1,000,000 BTU fired

$$E_{B.L.} = 3/3000 (1,650,000) = 1,650 \text{ lb/day}$$

$$E_{F.F.} = 0.1/1 \times 10^6 (850 \times 10^6 \text{ BTU/day}) = 85 \text{ lb/day}$$

$$E_{Total} = 1,735 \text{ lb/day}$$

BEST AVAILABLE COPY

STATEMENTS BY APPLICANT AND ENGINEER

A. Applicant

The undersigned owner or authorized representative of \* The Buckeye Cellulose Corporation is fully aware that the statements made in this application for a Construction permit are true, correct and complete to the best of his knowledge and belief. Further, the undersigned agrees to maintain and operate the pollution source and pollution control facilities in such a manner as to comply with the provisions of Chapter 403 Florida Statutes and all the rules and regulations of the Department or revisions thereof. He also understands that a permit, if granted by the Department, will be non-transferable and he will promptly notify the Department upon sale or legal transfer of the permitted establishment.

*F. P. Smith*

Signature of the Owner or Authorized Representative

F. P. Smith, Plant Manager

Name and Title (Please Type)

Date: 5/9/74 Telephone No.: (904) 584-3311

\* Attach a letter of authorization

B. Professional Engineer Registered in Florida:

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 control and discharge of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution source(s) with appropriate control facilities, when properly maintained and operated, will comply 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 the applicant a set of instructions for the proper maintenance and operation of the installation covered in this application.

Signature *Alfred Bernard Adams, Jr.*

Mailing Address: Rust Engineering Company  
P. O. Box 101  
Birmingham, Alabama 35201  
Telephone No.: (305) 323-6551

Name: Alfred Bernard Adams, Jr.  
(please type)

Florida Registration Number 17166  
(Please affix seal)

Date: April 15, 1974



PERMITTED

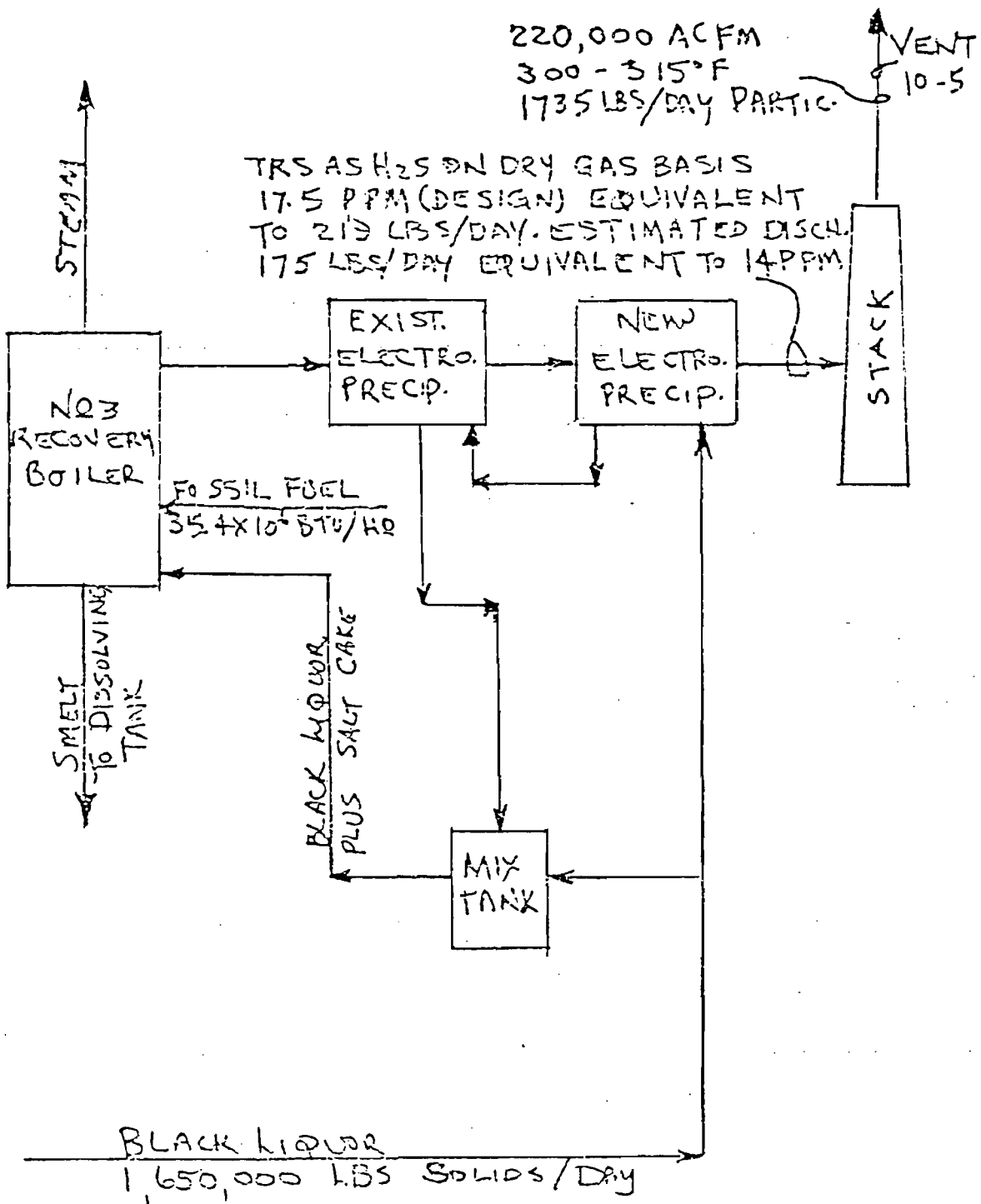
BY

ORWELL

DEPARTMENT OF POLLUTION CONTROL

PERMIT NO. 40-62-2221

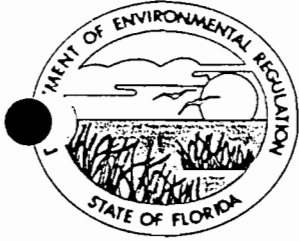
DATE 5/15/74



		MAT. CONT.	NO.	BY	DATE	THE RUST ENGINEERING COMPANY BIRMINGHAM, ALABAMA	
		FAB. RELEASE				No. 3 RECOVERY BOILER BUCKEYE CELLULOSE CORP. FELIX, FLA.	
BY	DATE	FIELD RELEASE				DATE	JOB NO 1049A
		APPD. BY				DR. BY ASA	
		DESIGNED BY				CK. BY	PA-4-15-74
							REV



TRS Project



## Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

**PERMITTEE:**

The Buckeye Cellulose Corp.  
Rt. 3, Box 260  
Perry, Florida 32347

Permit Number: AC 62-141925  
Expiration Date: September 24, 1989  
County: Taylor  
Latitude/Longitude: 30° 03' 59"N  
83° 33' 12"W  
Project: No. 3 Smelt Dissolving  
Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the permitting of the No. 3 Smelt Dissolving Tank (SDT) and the construction/installation of a new monitoring system for the existing scrubber system. The maximum total process input rate is 34,752 lbs/hr smelt and 8,246 lbs/hr weak wash solids. The location of the project will be at the permittee's existing facility. The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

The Standard Industrial Codes are: Industry No. 2611-Pulp Mills  
The Standard Classification Codes are: Pulp & Paper Industry  
Major Group 26: Sulfate (Kraft) Pulping  
o Smelt Dissolving Tank 3-07-001-05

Construction will be in accordance with the permit application, plans, documents, and reference materials submitted unless otherwise stated in the General and Specific Conditions.

Attachments to be Incorporated:

1. Buckeye's application package dated November 11, 1987, and received November 12, 1987.
2. C. H. Fancy's letter dated December 11, 1987.
3. C. H. Fancy's letter dated December 22, 1987.
4. Buckeye's letter dated January 5, 1988, and received January 15, 1988.
5. C. H. Fancy's letter dated January 22, 1988.
6. Buckeye's letter dated January 22, 1988, and received January 26, 1988.
7. Buckeye's letter dated February 10, 1988, and received February 12, 1988.
8. Technical Evaluation and Preliminary Determination dated March 22, 1988.
9. Mr. Ray Andreu's letter with attachments dated April 13, 1988, and received (hand delivered) April 15, 1988.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-141925  
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-141925  
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

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

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

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

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-141925  
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-141925  
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The No. 3 Smelt Dissolving Tank (SDT) may operate continuously (i.e., 8760 hrs/yr).
2. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H<sub>2</sub>S) shall not exceed 0.048 lb/3000 pounds black liquor solids (1.32 lbs/hr or 5.78 TPY and based on a permitted maximum processing capacity of 82,350 lbs/hr black liquor solids (BLS) in the No. 3 Recovery Boiler (RB) - equivalent to 34,752 lbs/hr green liquor solids and 8,246 lbs/hr weak wash solids).

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-141925  
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The maximum PM mass allowable emissions shall not exceed 24.1 lbs/hr or 105.3 TPY. These limits are based on the process capacity of 34,752 lbs/hr smelt and 8,246 lbs/hr weak wash solids and in accordance with FAC Rule 17-2.610(1).
4. Due to moisture interference, the visible emission limiting standard pursuant to FAC Rule 17-2.610(2) is not applicable and is deferred to FAC Rule 17-2.600(4)(a). However, if the Department observes visible emissions in excess of 20% opacity pursuant to FAC Rule 17-2.700(6)(b)9, it shall be considered good reason to believe that the applicable mass emission standard is in danger of being violated. The permittee shall be required to run a special compliance test in accordance with FAC Rule 17-2.700(2)(b). Such test shall be conducted within 14 days after the Department has notified the permittee of the applicability of this permit condition.
- 6.a. Annual compliance tests for PM shall be conducted using EPA Method 5, Determination of Particulate Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.  
b. An initial compliance test for TRS shall be conducted using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.
7. Pursuant to FAC Rule 17-2.960(1), the SDT shall be in final compliance by May 12, 1989, and the permittee shall provide proof of final compliance to the DER's Northeast District office by June 26, 1989.
8. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.
9. Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the No. 3 SDT is subject to the provisions of FAC Rules 17-2.710(3)(d), Establishing Specific Surrogate Parameters, and 17-2.710(4), Quarterly Reporting Requirements. The No. 3 SDT is subject to the provisions of FAC Rule 17-4.140, Reports.
10. The No. 3 SDT is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-141925  
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

11. The DER's Northeast District office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the DER's Northeast District office within 45 days of test completion.

12. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the specific surrogate parameters to be monitored, and the Certificate of Completion, to the DER's Northeast District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date pursuant to FAC Rules 17-2 and 17-4.

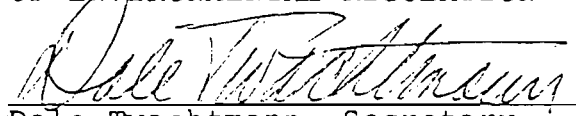
If the construction permit expires prior to the permittee filing an application for a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct pursuant to FAC Rule 17-4.

13. Any change in the method of operation, raw materials and chemicals processed, equipment, or operating hours pursuant to FAC Rule 17-2.100(118), Modification, shall be submitted for approval to the DER's Bureau of Air Quality Management office and Northeast District office.

14. The No. 3 SDT is subject to the provisions of FAC Rule 17-2.971(2)(c), Compliance Schedules for Continuous Monitoring Requirements, which requires compliance by August 12, 1989.

Issued this 27 day of May,  
1989

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtmann, Secretary



# Buckeye Florida

Route 3, Box 260 • Perry, Florida 32347  
Telephone: (904) 584-1121

October 2, 1995

Mr. A. A. Linero, P.E.  
Administrator, New Source Review Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED

OCT 5 1995

Bureau of  
Air Regulation

RE: Buckeye Florida, Limited Partnership  
Permit: AO62-187788; Source ID: 31JAX62000107  
No. 3 Recovery Boiler

Dear Mr. Linero:

The particulate emissions (saltcake) from our No. 3 Recovery Boiler are controlled by two existing electrostatic precipitators (ESP) arranged in series. We have determined that these two ESP's, which were originally installed in the mid 1970's, are approaching the end of their functional life. Therefore, we are proposing to replace these two existing ESP's with one new modern ESP.

The two existing ESP's are of the wet bottom and weighted wire electrode design. The new ESP will be of the dry bottom and rigid electrode design with the necessary ancillary equipment to recycle the saltcake back into the black liquor. We have reviewed available data and there is no indication that there will be any increase in the emissions of any regulated pollutant as a result of changing from wet bottom to dry bottom type ESP. The design criteria for the new ESP will specify that particulate emissions control meet that of the current system. Attached are flow diagrams for the current and proposed ESP systems.

There will be no increase in recovery boiler operating capacity, pollutant emission rates, nor any significant changes in flue gas parameters as a result of this proposed ESP replacement. Professional Engineer Certification is attached. Therefore, we are requesting an amendment to the permit referenced above that will allow for the replacement of the two existing ESP's with one new ESP. We have enclosed a check for \$250 to cover the processing fee. If you have any questions, please call Bruce Harding (904)-584-1106.

Sincerely,

BUCKEYE FLORIDA, LIMITED PARTNERSHIP

C.S. Aiken  
Plant Manager

CC:

Christopher L. Kirts, P.E.  
Air Program Administrator  
FDEP Northeast District Office  
Suite B-200, 7825 Baymeadows Way  
Jacksonville, Florida 32256-7577







September 28, 1995

Mr. A. A. Linero, P.E.  
Administrator, New Source Review Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Buckeye Florida, Limited Partnership  
Permit: AO62-187788; Source I.D. 31JAX62000107  
No. 3 Recovery Boiler ESP Replacement

Dear Mr. Linero:

The purpose of this correspondence is to present my evaluation and certification of the proposed project by Buckeye Florida (BKI) to replace the existing electrostatic precipitators (ESP) on the No. 3 Recovery Boiler at the Foley mill. BKI will be replacing the two existing ESPs on the recovery boiler with a single ESP. BKI will be providing a description of this replacement project in a separate letter to the Department. I have reviewed BKI's letter, and concur with the statements made in the letter. I have also reviewed the engineering aspects of the project, and have concluded that no increase in emissions of any regulated pollutant should occur as a result of the replacement.

My engineering certification is provided below.

Professional Engineer Statement:

*I, the undersigned, hereby certify that to the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this letter, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and the engineering features of No. 3 Recovery Boiler ESP replacement project have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of air emissions.*

David A. Buff

*David A. Buff*  
Signature

*9/27/95*  
Date

Florida P.E. #19011

(seal)

KBN ENGINEERING AND APPLIED SCIENCES, INC.

15236A/2	6241 Northwest 23rd Street, Suite 500 Gainesville, Florida 32653-1500 904-336-5600 FAX 904-336-6603	5405 West Cypress Street, Suite 215 Tampa, Florida 33607 813-287-1717 FAX 813-287-1716	1801 Clint Moore Road, Suite 105 Boca Raton, Florida 33487 407-994-9910 FAX 407-994-9393	7785 Baymeadows Way, Suite 105 Jacksonville, Florida 32256 904-739-5600 FAX 904-739-7777	1616 'P' Street N.W., Suite 450 Washington, D.C. 20036 202-462-1100 FAX 202-462-2270
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A. A. Linero  
Page 2  
September 28, 1995



Thank you for consideration of these comments, and please call if you have any questions concerning this information.

Sincerely,

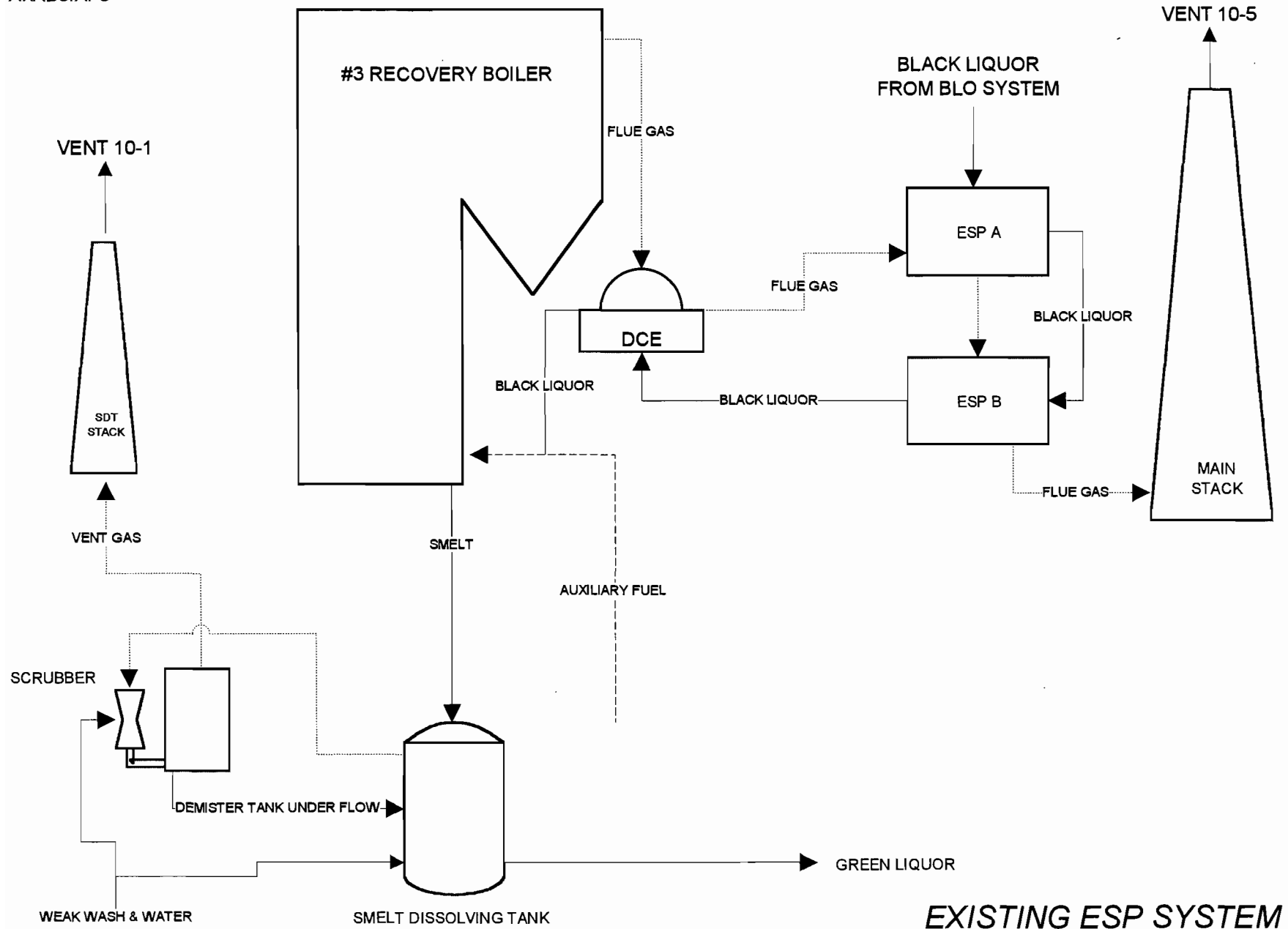
*David A. Buff*

David A. Buff, P.E.

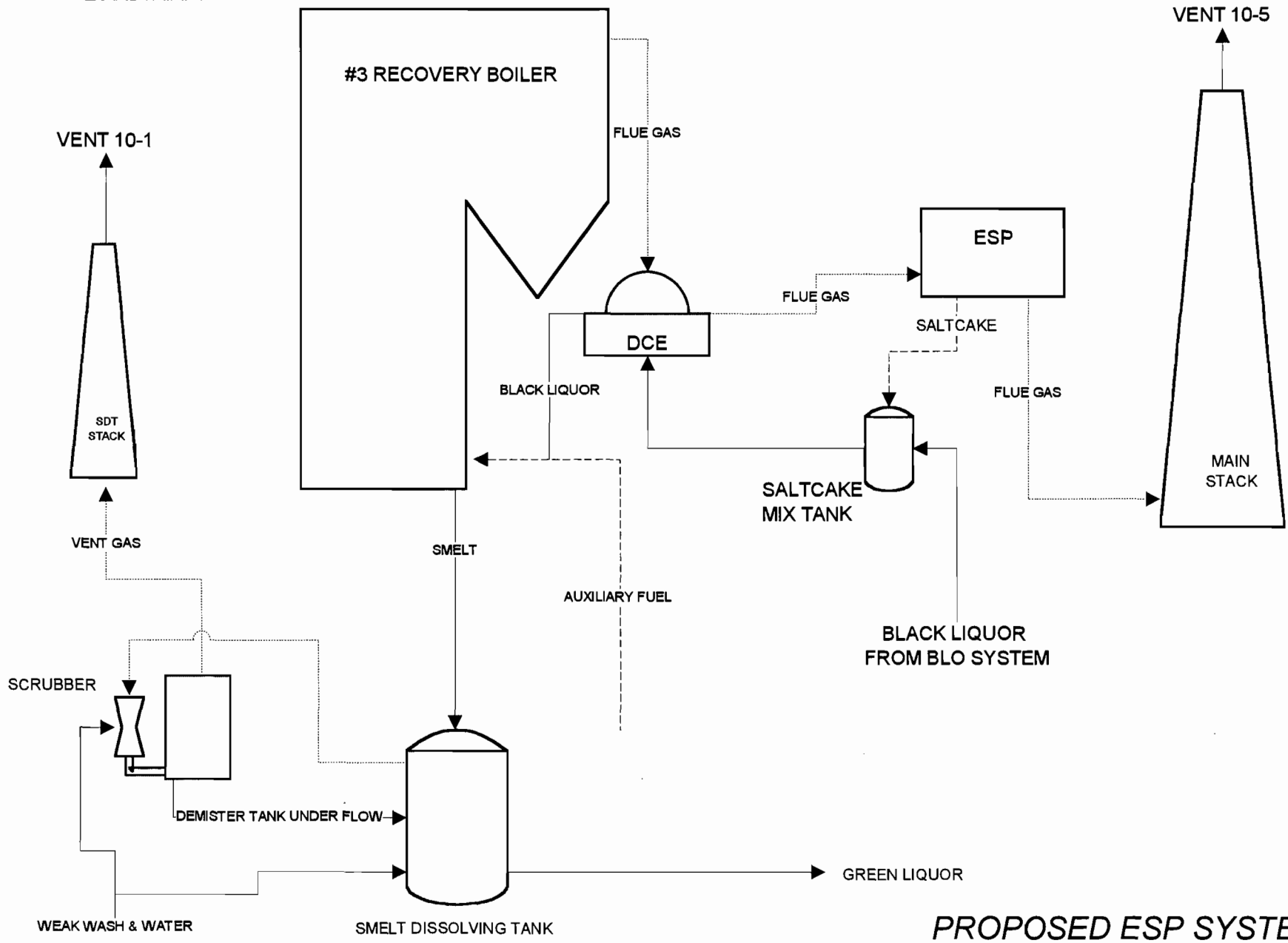
DB/arz

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**EXISTING ESP SYSTEM**



**PROPOSED ESP SYSTEM**

DOCUMENT	DATE	INVOICE	GROSS AMOUNT	DISCOUNT	NET AMOUNT
605898	10/02/95	#A062-187788	250.00	0.00	250.00
Totals:USD			250.00	0.00	250.00

THE FACE OF THIS DOCUMENT HAS A MULTICOLORED BACKGROUND ON WHITE PAPER

**BUCKEYE FLORIDA, L.P.**  
 ROUTE 3, BOX 260  
 PERRY, FLORIDA 32347

SUN BANK / MID FLORIDA, N.A. 63-115  
631

IN SETTLEMENT OF ACCOUNT AS FOLLOWS:

VENDOR NO.: 10203

DATE:

10/02/1995

CHECK NO.

115988

AMOUNT:

\*\*\*\*\*\$250.00

PAY: ■ TWO HUNDRED FIFTY DOLLARS AND 00 CENTS \*\*\*\*\*

➡➡➡➡➡➡ **PAY ONLY** **250.00**  
 TWO FIVE ZERO CTSCTS

TO THE  
 ORDER  
 OF

**FLORIDA DEPARTMENT OF  
 ENVIRONMENTAL PROTECTION**  
 2600 BLAIR STONE ROAD  
 TALLAHASSEE, FL 32399-2400

*[Signature]*  
 AUTHORIZED SIGNATURE

FORM NO. 9703L

Z 127 633 150



**Receipt for Certified Mail**

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to <i>C S Aiken</i>	
Street and No. <i>Buckeye</i>	
P.O. State and ZIP Code <i>Perry, FL</i>	
Postage L	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>1-18-96</i> <i>1230001-03-AC</i>	

PS Form 3800, March 1993

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
*C. S. Aiken, Plant Mgr.*  
*Buckeye, Fla. LP*  
*Route 3, Box 260*  
*Perry, FL 32347*

4a. Article Number  
*Z 127 633 150*

4b. Service Type  
 Registered     Insured  
 Certified     COD  
 Express Mail     Return Receipt for Merchandise

7. Date of Delivery  
*1-22-96*

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

*[Handwritten Signature]*

PS Form 3811, December 1991

★U.S. GPO: 1993-352-714

**DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF PERMIT

Virginia B. Wetherell  
Secretary

In the matter of an  
Application for Permit by:

DEP File No. 1230001-03-AC  
Taylor County


Mr. C. S. Aiken, Plant Manager  
Buckeye Florida Ltd. Partnership  
Route 3, Box 260  
Perry, Florida 32347

Enclosed is Permit Number 1230001-03-AC which reissues expired permit AC62-197417 and removes the emission limit and testing requirement for PM<sub>10</sub> and the particulate matter testing requirements for the sidestream pulping process at the Buckeye Florida facility in Perry, Taylor County, Florida. This permit is issued pursuant to Section 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 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 14 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

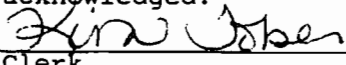
STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
904-488-1344

## CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed by certified mail before the close of business on 1-18-96 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  
1-18-96  
Date

Copies furnished to:

C. Kirts, NED  
D. Buff, KBN

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Final Determination

Buckeye Florida Limited Partnership  
Taylor County  
Perry, Florida

Sidestream Pulping Process  
Permit No. 1230001-03-AC

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

January 16, 1996



## Final Determination

The Intent to Issue an amended permit to construct which replaced expired permit AC62-197417 for a sidestream pulping process at the Buckeye Florida Ltd. Partnership facility in Taylor County, Florida was distributed on December 14, 1995. The Notice of Intent to Issue was published in the Perry News-Herald on December 22, 1995. The Notice stated that the reissued permit would remove the emission limit and testing requirement for PM<sub>10</sub> and the testing particulate matter testing requirement. Copies of the Intent to Issue were available for public inspection at the Department's offices in Tallahassee and Jacksonville.

No written comments were received within 14 days of the publication of this Notice. The Department will issue permit 1230001-03-AC as Noticed.



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

**PERMITTEE:**  
Buckeye Florida Ltd. Partnership  
Post Office Box 260  
Perry, Florida 32347

**Permit Number:** AC1230001-03-AC  
**Expiration Date:** 6/30/96  
**Project:** Sidestream Pulping  
Process

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4, 62-210 through 297. 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 the amendment of the construction permit AC 62-197417 which expired May 31, 1994 to remove the PM<sub>10</sub> standard and testing requirements from Specific Conditions 5 and 7 and the particulate matter testing requirements from Specific Condition 6.

The process utilizes processed pulp and chemicals as sidestream process. The project does not increase plant capacity, water usage or efficient flow.

The Buckeye Florida, Limited Partnership facility is located on Route 3 near Perry, Taylor County, Florida. The UTM coordinates of this facility are Zone 17, 256.74 km East and 3328.70 km North.

The project shall be constructed/operated in accordance with the attached request, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

**Attachments are listed below:**

1. Original construction permit AC62-197417 issued September 27, 1991.
2. Extension of AC62-197417 dated March 10, 1993.
3. Correction of AC62-197417 dated November 1, 1991.

PERMITTEE:  
Buckeye Florida Ltd. Ptsp.

Permit Number: 1230001-003-AC  
Expiration Date: 6/30/96

**SPECIFIC CONDITIONS:**

1. This permit supersedes permit AC62-197417 dated September 27, 1991, and its revisions: 1) Extension of AC62-197417 dated March 10, 1993 and 2) Correction of AC62-197417 dated November 1, 1991.

2. The provisions of permit AC62-197417 dated September 27, 1991 and its revisions referenced above are incorporated into this air construction permit except for the following changes to AC62-197417.

SPECIFIC CONDITION NO. 5:

From:

The sidestream pulping process shall not exceed the following pollutant emission standard/limitations:

Source	Pollutant	Standard/Limitation
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
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
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) Volumetric flow rates are:

S1 7150 acfm  
S2 5300 acfm  
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:  
Buckeye Florida Ltd. Ptsp.

Permit Number: 1230001-003-AC  
Expiration Date: 6/30/96

To:

The sidestream pulping process shall not exceed the following pollutant emission standard/limitations:

Source	Pollutant	Standard/Limitation
S1	PM VE	0.65 lb/hr; 2.85 TPY less than 20% opacity
S2	PM VE	0.48 lb/hr; 2.10 TPY less than 20% opacity
S3	PM VE	0.70 lb/hr; 3.07 TPY less than 20% opacity

---

Note: 1) Volumetric flow rates are:

S1 7150 acfm  
S2 5300 acfm  
S3 4420 acfm

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

SPECIFIC CONDITION NO. 6:

From:

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.

To:

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

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

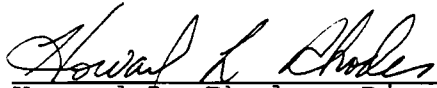
PERMITTEE:  
Buckeye Florida Ltd. Ptsp.

Permit Number: 1230001-003-AC  
Expiration Date: 6/30/96

SPECIFIC CONDITION NO. 7:

Specific Condition No. 7 is deleted.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
Howard L. Rhodes, Director  
Division of Air Resources  
Management

Memorandum

Florida Department of  
Environmental Protection

TO: Howard L. Rhodes  
THRU: C. H. Fancy  
A. A. Linero  
FROM: Ed Svec  
DATE: January 12, 1996  
SUBJ: Amendment/Reissue of Expired Construction Permit  
Buckeye Florida Ltd. Partnership - 1230001-03-AC

*al*  
**RECEIVED**

JAN 17 1996

BUREAU OF  
AIR REGULATION

Attached for your approval and signature is a reissued construction permit which amends expired permit AC62-197417. Buckeye Florida requested the removal of conditions requiring an emission limit and testing of PM<sub>10</sub> and particulate matter testing at a sidestream pulping process. High moisture content of the process caused the PM<sub>10</sub> tests to be unreliable and there were no test requirements in the rules beyond opacity testing. This process was permitted under particulate matter process weight rules.

I recommend you approve the issuance of this amended permit.

CHF/es/t



# Buckeye Florida

Route 3, Box 260 • Perry, Florida 32347  
Telephone: (904) 584-1121

NOTIFICATION  
BUREAU OF

DEC 27 1995

**RECEIVED**

December 27, 1995

Mr. A.A. Linero, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Buckeye Florida, Limited Partnership  
Permit: AC62-197417 File:1230001-003-AC  
Publication of NOTICE OF INTENT TO ISSUE PERMIT

Dear Mr. Linero:

Enclosed is one copy of the Affidavit verifying publication of the NOTICE OF INTENT TO ISSUE PERMIT (NOTICE) for the proposed project described in DEP File No. 1230001-003-AC. The NOTICE was received by Buckeye Florida, Limited Partnership (Buckeye) on December 18, 1995. The NOTICE was published one time in accordance with Florida Administrative Code Section 62-103.150.

The date of publication of the NOTICE was December 22, 1995 in the "Perry News-Herald" Legal Ad section. The "Perry News-Herald" is a newspaper with general circulation in the affected area of Taylor County, Florida. The date of publication was within the 30 day period from the date on which the document was received by Buckeye. This proof of publication is being provided to the Department within seven days of the date of publication.

There is a typographical error contained in paragraph 3 on Page 1 of 4 of the DRAFT construction permit. The last sentence should read "This project does not increase plant capacity, water usage or effluent flow." If you have any questions or need additional information, please contact Ray Perry at (904) 584-1333.

Sincerely,

BUCKEYE FLORIDA, LIMITED PARTNERSHIP

Bruce Harding  
Environmental Control Manager



RECEIVED

DEC 27 1995

BUREAU OF AIR REGULATION

**THE PERRY NEWS-HERALD**  
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 Perry News-Herald, weekly newspaper published in Perry, Taylor County, Florida, that the attached copy of advertisement in re: Notice of Intent to Issue Permit 1230001-003-AC

..... was published in said newspaper in the issues of:.....

..... 12/22.....

Affiant says further that the said Perry News-Herald 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 proceeding 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  
Sworn to and subscribed before me this 27th day of Dec, 1995  
*Patricia J. Farniss*  
Notary Public

PATRICIA J. FARNISS  
Notary Public, State of Florida  
My Comm. Exp. 12/24, 1999  
Comm. No. 00439709

The Department of Environmental Protection (Department) gives notice of its intent to issue an amended construction permit for a sidestream pulping process to Buckeye Florida, Route 3 Box 260, in Taylor County, Perry, Florida 32347. The changes from the original permit consist of removing the emission limitations for and test requirements for particulate matter greater than 10 microns and testing requirements for particulate matter from AC 62-197417, Specific Condition Nos. 5, 6, and 7. The sidestream pulping process does not emit significant amounts of particulate matter. The removal of these limits will not result in increase in ground level concentrations of particulate matter.

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 62399-2400, 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 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, Florida Statutes, 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, Florida Administrative Code.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday thru Friday, except legal holidays, at the Department of Environmental Protection, Northeast District Office, 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7577.

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Any persons may send written comments on the proposed action to Administrator, New Source Review at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.



Z 127 633 221



### Receipt for Certified Mail

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

PS Form 3800, March 1993

Sent to	C.S. Aiken
Street and No.	Buckeye
P.O., State and ZIP Code	Perry FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	12-14-95
1230001-03 AC	

Is your RETURN ADDRESS completed on the reverse side?

#### SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
  - Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:  
C.S. Aiken, Plant Mgr  
Buckeye Fla. Ltd Ps.  
Route 3, Box 260  
Perry, FL 32347

4a. Article Number  
Z 127 633 221

- 4b. Service Type
- Registered  Insured
- Certified  COD
- Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
12-18-95

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

*A Moore*

PS Form 3811, December 1991

U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

December 14, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. S. Aiken, Plant Manager  
Buckeye Florida  
Route 3, Box 260  
Perry, Florida 32347

Re: Sidestream Pulping Process, 1230001-03-AC, AC 62-197417  
Request to Amend/Re-issue Construction Permit

Attached is one copy of the proposed re-issued/amended construction permit, Intent to Issue, and Notice of Intent to Issue (for publication by Buckeye) for the above referenced emissions unit.

Please submit any comments you may have concerning the Department's proposed action to Mr. A. A. Linero, P.E., at the above address. If you have any questions, please call Mr. Ed Svec or Mr. Linero at (904) 488-1344.

Sincerely,

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

CHF/es/t

cc: C. Kirts, NED  
D. Buff, KBN

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an  
Application for Permit Amendment

DEP File No. 1230001-003-AC  
Taylor County

Buckeye Florida Ltd. Partnership  
Route 3 Box 260  
Perry, Florida 32347

---

INTENT TO ISSUE

The Department of Environmental Protection (Department) gives notice of its intent to re-issue an expired construction permit for a sidestream pulping process at the Buckeye Florida facility located on Route 3, Taylor County, in Perry, Florida.

On September 18, 1995 the Bureau of Air Regulation received a request to amend the construction permit for the sidestream pulping process. The applicant, Buckeye Florida, requested that the Department remove the emission limit and testing requirement for PM<sub>10</sub> and the particulate matter testing requirement from air construction permit number AC 62-197417 Specific Condition Nos. 5, 6 and 7. The applicant stated that the PM<sub>10</sub> and particulate matter limit was not based on a regulatory standard, nor does it reflect an emission limitation requested by Buckeye Florida to avoid a specific rule applicability.

The Department intends to remove the PM<sub>10</sub> limit and test requirement and the particulate matter test requirement from AC 62-197417 Specific Condition Nos. 5, 6 and 7 since these requirements were not based on a regulatory standard, nor do they reflect an emission limitation requested by Buckeye Florida to avoid a specific rule applicability such as PSD.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a permit is required for the proposed work.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, 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. 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 their 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.

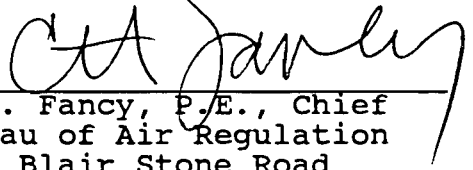
The Petition shall contain the following information;

- (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 intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request 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 receipt of this intent 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.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

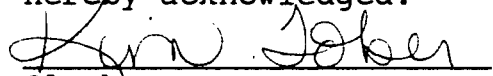
  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **INTENT TO ISSUE PERMIT** all copies were mailed by certified mail before the close of business on 12-14-95 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  
12/14/95  
Date

Copies furnished to:

- C. Kirts, NED
- D. Buff, KBN

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF INTENT TO ISSUE PERMIT  
1230001-003-AC

The Department of Environmental Protection (Department) gives notice of its intent to issue an amended construction permit for a sidestream pulping process to Buckeye Florida, Route 3 Box 260, in Taylor County, Perry, Florida 32347. The changes from the original permit consist of removing the emission limitations for and test requirements for particulate matter greater than 10 microns and testing requirements for total particulate matter from AC 62- 197417, Specific Condition Nos. 5, 6, and 7. The sidestream pulping process does not emit significant amounts of particulate matter. The removal of these limits will not result in the increase in ground level concentrations of particulate matter.

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 (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, 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 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/request 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, Florida Administrative Code.

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

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Department of Environmental Protection  
Northeast District  
Suite B-200, 7825 Baymeadows Way  
Jacksonville, Florida 32256-7577

Any person may send written comments on the proposed action to Administrator, New Source Review at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.



# Department of Environmental Protection

**DRAFT**

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

**PERMITTEE:**  
**Buckeye Florida Ltd. Partnership**  
**Post Office Box 260**  
**Perry, Florida 32347**

**Permit Number: AC1230001-03-AC**  
**Expiration Date: 6/30/96**  
**Project: Sidestream Pulping**  
**Process**

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4, 62-210 through 297. 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 the amendment of the construction permit AC 62-197417 which expired May 31, 1994 to remove the PM<sub>10</sub> standard and testing requirements from Specific Conditions 5 and 7 and the particulate matter testing requirements from Specific Condition 6.

The process utilizes processed pulp and chemicals as sidestream process. The project does not increase plant capacity, water usage or efficient flow.

The Buckeye Florida, Limited Partnership facility is located on Route 3 near Perry, Taylor County, Florida. The UTM coordinates of this facility are Zone 17, 256.74 km East and 3328.70 km North.

The project shall be constructed/operated in accordance with the attached request, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

**Attachments are listed below:**

1. Original construction permit AC62-197417 issued September 27, 1991.
2. Extension of AC62-197417 dated March 10, 1993.
3. Correction of AC62-197417 dated November 1, 1991.



PERMITTEE:  
Buckeye Florida Ltd. Ptsp.

Permit Number: 1230001-003-AC  
Expiration Date: 6/30/96

**DRAFT**

**SPECIFIC CONDITIONS:**

1. This permit supersedes permit AC62-197417 dated September 27, 1991, and its revisions: 1) Extension of AC62-197417 dated March 10, 1993 and 2) Correction of AC62-197417 dated November 1, 1991.
2. The provisions of permit AC62-197417 dated September 27, 1991 and its revisions referenced above are incorporated into this air construction permit except for the following changes to AC62-197417.

SPECIFIC CONDITION NO. 5:

From:

The sidestream pulping process shall not exceed the following pollutant emission standard/limitations:

Source	Pollutant	Standard/Limitation
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
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
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) Volumetric flow rates are:

S1 7150 acfm  
S2 5300 acfm  
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:  
Buckeye Florida Ltd. Ptsp.

Permit Number: 1230001-003-AC  
Expiration Date: 6/30/96

**DRAFT**

To:

The sidestream pulping process shall not exceed the following pollutant emission standard/limitations:

Source	Pollutant	Standard/Limitation
S1	PM VE	0.65 lb/hr; 2.85 TPY less than 20% opacity
S2	PM VE	0.48 lb/hr; 2.10 TPY less than 20% opacity
S3	PM VE	0.70 lb/hr; 3.07 TPY less than 20% opacity

Note: 1) Volumetric flow rates are:

S1 7150 acfm  
S2 5300 acfm  
S3 4420 acfm

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

SPECIFIC CONDITION NO. 6:

From:

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.

To:

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

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

PERMITTEE:  
Buckeye Florida Ltd. Ptsp.

Permit Number: 1230001-003-AC  
Expiration Date: 6/30/96

SPECIFIC CONDITION NO. 7:

Specific Condition No. 7 is deleted.

**DRAFT**

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

Howard L. Rhodes, Director  
Division of Air Resources  
Management

TO: C. H. Fancy  
FROM: A. A. Linero *AAL* 12/13  
DATE: December 13, 1995  
SUBJ: Buckeye Florida Limited Partnership  
Request to Re-issue Expired Construction  
Permit with Corrections

Attached for your review and approval is a permit which re-issues and amends the expired construction permit to Buckeye Florida Limited Partnership. The original permit, AC62-197417, was issued to Proctor and Gamble Cellulose Company and included requirements for testing PM<sub>10</sub> and particulate matter and an emission limit on PM<sub>10</sub>. The source is governed by the general particulate rule which does not include these requirements. The specific conditions which imposed limits and testing requirements for PM<sub>10</sub> and particulate matter are Specific Conditions 5, 6, and 7.

The PM<sub>10</sub> emission limit and the testing requirements were not based upon rule requirements, nor were they based on public health or welfare concerns.

If you have any questions, Ed Svec and I will be glad to discuss the details.

AAL/ES/t



# Buckeye Florida

Route 3, Box 260 • Perry, Florida 32347  
Telephone: (904) 584-1121

0104621

3755  
2222

1995 SEP 18 12:29

123001-003-AC

September 15, 1995

Mr. Clair Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Buckeye Florida, Limited Partnership  
Facility: 31JAX620001; Permit: AC62-197417  
EU: 42,43,44; Sidestream Pulping Process

Dear Mr. Fancy:

As part of our preparation for submission of a Title V permit application, we have reviewed our current construction and operation permits as suggested by the Department. As such, we have identified a number of permit requirements to which we would propose changes as part of the Title V application process. We will address most potential permit "clean up" items within the context of the Title V application. However, we would like to pursue a change to the construction permit for our Sidestream Pulping Process prior to the Title v application.

The Sidestream Pulping Process (Sidestream) is a minor source (less than 10 TPY) of particulate (PM) emissions and particulate emissions with an aerodynamic diameter of 10 microns or less (PM10) located at our existing facility near Perry in Taylor County Florida. The Sidestream was constructed under the provisions of AC62-197417. This permit contains emissions limits and annual testing requirements for PM, PM10 and visible emissions. We would like the Department to issue an amendment to AC62-197417 to remove the emissions limits for PM10 and the annual testing requirements for PM10 and PM.

The basis for our request to remove the PM10 emissions limits and annual testing requirements is the peculiar and seemingly unreliable PM10 test results that we have obtained during initial and subsequent compliance testing of the Sidestream. Details are contained in Attachment 2. The basis for our request to remove the annual PM test requirement is that it is not required under FAC 62-297. Attachment 1 contains a summary of these requests along with suggested permit language that would effect these changes.

These proposed changes have been previously discussed during a July 13, 1995 meeting between Department Staff and Buckeye that included Mr. Bruce Mitchell, Mr. Al Linero, Mr. Bob Leetch, Mr. John Cole, Mr. Mort Benjamin of the Department and Mr. Ray Perry, Mr. Earle Greene, Mrs. Cecile Hance and Mr. David Buff of KBN. We have enclosed a check for \$250 to cover the processing fee. If you have any questions, please call Ray Perry at (904)-584-1333.

Sincerely,

BUCKEYE FLORIDA, LIMITED PARTNERSHIP

C. S. Aiken  
Plant Manager



## Attachment 1: Sidestream Pulping Process

**Source:** Sidestream Pulping Process

**Permit#:** AC62-197417, expires January 31, 1996.

**Request:**

1. Issue an amendment to this permit that will remove the PM10 emissions limits and the annual testing requirements for PM10 and PM from the construction permit.

**Rationale:**

The Sidestream Pulping Process (Sidestream) processes bleached pulp. The emissions points in the Sidestream process are directly related to the pulp transport system within the Sidestream. There are three emissions points associated with the transport of pulp within the Sidestream: two process cyclone exhausts and one dryer exhaust. The process cyclones are part of the pneumatic conveying systems and the emissions are a function of their design efficiency. Since the Sidestream is a miscellaneous process, it is subject to *FAC 62-296.310 General Particulate Emissions Limiting Standards*. The emissions limits for PM and PM10 were permitted based on vendor estimates for the cyclones and the dryer exhaust.

The PM/PM10/VE were tested initially and subsequently. In both instances, it was indicated that the PM10 test results are unreliable and highly questionable for this source. Reference Attachment 2. In addition, the PM emissions were demonstrated to be well within the vendor estimates with no visible emissions. Since the Sidestream is a minor source of emissions, less than 10 Tons per Year of PM, we propose to drop the PM10 emissions limit and associated test requirements. We also propose the removal of the annual testing requirement for PM emissions. Annual testing is not required pursuant to *FAC 62-297.340(1)(d)*. PM testing should only be required initially and for operation permit renewal.

**Proposal:** (suggested language)

1. Revise Specific Condition No. 5 to reflect the changes as follows:

5. *For PSD tracking purposes, the PM and PM10 emissions from the Sidestream Pulping Process are 8.02 and 3.2 tons per year respectively.*

5.a) *The emissions rates for the sidestream pulping process are:*

<u>Source</u>	<u>Pollutant</u>	<u>Maximum Allowable Emissions Rates</u>
S1	PM VE	0.65 lb/hr; 2.85 TPY 20% Opacity
S2	PM VE	0.48 lb/hr; 2.10 TPY 20% Opacity
S3	PM VE	0.70 lb/hr; 3.07 TPY 20% Opacity

Note: 1) *Projected volumetric flow rates are:*

<i>S1</i>	<i>7150 acfm</i>
<i>S2</i>	<i>5300 acfm</i>
<i>S3</i>	<i>4420 acfm</i>

2) *Allowable emissions rates include a 20% margin of safety above vendor estimates*

3) *PM10 emissions are estimated at 40% of PM emissions*

2. **Revise Specific Condition No. 6 as follows:**

*“Initial and subsequent compliance tests for PM emissions, shall be conducted in accordance with Rule 62-297 and 40 CFR 60 Appendix A, Method 5, Determination of Particulate Emissions from Stationary Sources.”*

3. **Revise Specific Condition No. 7 as follows:**

*“Initial and annual compliance tests for VE shall be conducted in accordance with Rule 62-297 and 40 CFR 60, Appendix A, Method 9, Visual Determination of Opacity Emissions from Stationary Sources.”*

## **ATTACHMENT 2: SIDESTREAM PULPING PROCESS**

### **PM10 Emissions:**

During both the initial testing and subsequent testing of the Sidestream, there were problems encountered with the PM10 testing. Attached are an excerpt from the Weston Test Report, a letter from ESE, a letter from NCASI, and a memo from EPA. In the case of the PM10 measurements, there appears to be considerable doubt as to the validity of EPA Method 201 & 201A for determining PM10 emissions of lightweight fibrous particulate matter.

The suspected cause of the problems are the non-spherical shape and the mass to surface area ratio of the material. Because of these physical characteristics, it is suspected that the particles do not exhibit the same aerodynamic behavior as spherical particles of the same mass for which the cyclonic separation devices used in the PM10 methods are designed. In addition, the wet pulp cyclone discharge has been found to contain entrained water droplets. The EPA memo recognizes that Method 201 & 201A are not applicable for gas streams of this type.





## SECTION 2 RESULTS AND DISCUSSION

Table 2-1 summarizes the results of the PM and PM<sub>10</sub> emission testing performed at the Buckeye Florida, L.P. mill in Perry, Florida. The following subsections provide detailed results of each aspect of the testing effort.

**Table 2-1**  
**Summary of Emission Test Results**

Source	Mean Test Values, lb/hr	
	PM	PM <sub>10</sub>
No. 1 Pulping Sidestream Vent		
December	0.17	0.29
January	0.07	----
No. 2 Pulping Sidestream Vent	0.07	0.02
No. 3 Pulping Sidestream Vent	0.13	0.08

FDGP  
ID#

42

43

44

During sampling in December 1994, PM<sub>10</sub> emissions from the No. 1 Pulping Sidestream Vent exceeded the total PM emissions. During subsequent retesting in January 1995, water droplets were found to be entrained in the gas stream. The United States Environmental Protection Agency (EPA) recognizes that there is not currently an acceptable method for the determination of PM<sub>10</sub> concentrations from gas streams containing entrained water droplets. Therefore, results from this test should be considered invalid.

EPA Reference Method 201A determines PM<sub>10</sub> concentration based on the separation of particles by a cyclone at a specific velocity. The PM present in the three sources is very lightweight, fibrous, and has a tendency to aggregate or "clump" together. The behavior of these fibers and clumps in the cyclone separator is unpredictable. One reasonable assumption is that, due to the shape of the particles, the surface area to mass ratio will be higher than an ideal spherical



particle. This particulate geometry has the potential to bias the mass collected on the filter. Due to the fibrous nature of the PM present, the  $PM_{10}$  results obtained by EPA Reference Method 201A from Nos. 2 and 3 Pulping Sidestream Vents should be regarded as suspect.

## 2.1 NO. 1 PULPING SIDESTREAM VENT

Tables 2.1-1 and 2.1-2 summarize the results of the PM emission testing performed during 13 December 1994 and 31 January - 2 February 1995 on the No. 1 Pulping Sidestream Vent. Table 2.1-3 presents the results of the  $PM_{10}$  emission testing performed on 14 December 1994.

Field and laboratory data are provided in Appendices B and E, respectively. Sample calculations are presented in Appendix F.

## Attachment 2(b)



Environmental  
Science &  
Engineering, Inc.

September 20, 1993

Ray Perry  
Buckeye Cellulose  
Chemicals Module  
Route 3  
PO Box 260  
Perry, FL 32347  
PH: (904)-584-0333  
FAX: (904)-584-9517

Dear Ray:

This letter is to document two observations concerning the  $PM_{10}$  tests ESE recently conducted for Stack #3 of the sidestream project at the Buckeye Cellulose, Perry, Florida facility.

The first observation is that the particulate matter was extremely lightweight and seemed to have an affinity for itself. Either the fibrous shape or static charge (or both) caused the particulate to aggregate and form clusters. In some cases, the clusters would dissociate and break apart on impact; however, the clusters would reform once enough of the material was present. This was evident in both the  $PM_{10}$  and "non- $PM_{10}$ " fractions of the sample. For this reason, we have some reservations about the representativeness of the measurements using this technique. It is difficult to assess what sort of bias this may have introduced, since an argument may be made in either direction.

The second observation is that the flows measured using the  $PM_{10}$  train were significantly higher in all cases than those measured during the Method 5 runs. This was due to the fact that the flow was somewhat stratified in the stack and the Method 201A ( $PM_{10}$ ) train uses fewer points. Since the flows measured from the  $PM_{10}$  train overestimated the emissions of  $PM_{10}$ , we chose to use these values in order to present the worst case for mass emission rates.

If you have any questions regarding these observations or if I may be of any other assistance, please do not hesitate to call me at (904)-333-6606.

Sincerely,

Bill Mayhew  
Chemical Engineer  
Manager, Source Testing

SOUTHERN REGIONAL CENTER  
P.O. Box 141020  
Gainesville, FL 32614-1020  
(904) 377-4708  
FAX: (904) 371-6557

NATIONAL COUNCIL OF THE PAPER INDUSTRY FOR AIR AND STREAM IMPROVEMENT, INC.

January 11, 1995

Mr. Ray Perry  
Buckeye Florida Limited Partnership  
Route 3, Box 260  
Perry, Florida 32347

Dear Ray:

I have reviewed the comments of Bill Mayhew of ESE regarding the PM<sub>10</sub> sampling conducted on the pulping side stream unit. Bill observed that the pulp fibers in the gas stream aggregated into clusters. I think that there is a significant potential for the fibers in these clusters to be reentrained into the gas stream and not be collected by the Method 201A cyclone. This would cause particles greater than 10  $\mu$ m diameter to be collected on the filter and erroneously counted as PM<sub>10</sub>. A different particle sizing device should be used in this application. I think that an impactor with greased collection plates would provide the best alternative. This is the type of collection device we used with good results in our study of workplace concentrations of paper dust.

If I can be of further assistance in this matter, please do not hesitate to contact me.

Sincerely,



David C. Rovell-Rixx  
Research Engineer

DCRR/kms

---

EMISSION MEASUREMENT TECHNICAL INFORMATION CENTER  
TECHNICAL INFORMATION DOCUMENT

---

BACKGROUND

The methods for measuring  $PM_{10}$  emissions, Methods 201 and 201A, were promulgated on April 17, 1990 (55 FR 14246). The Environmental Protection Agency (EPA) stated in the preamble that "The  $PM_{10}$  methods are not recommended for stacks with entrained moisture droplets because water drops larger than  $PM_{10}$ , which are captured by the  $PM_{10}$  cyclone, may contain particles which normally would be counted as  $PM_{10}$ ."

Since promulgation, there have been many questions on how to measure  $PM_{10}$  emissions in the presence of water droplets, such as after a wet scrubber.

RECOMMENDATION

Methods 201 and 201A are not applicable for in-stack  $PM_{10}$  measurement in stack gases containing water droplets. Where water droplets are known to exist in the emissions and when  $PM_{10}$  measurement is desired, EPA recommends that Method 5 (or a comparable method) be used and its particulate catch be considered as  $PM_{10}$  emissions.

DOCUMENT	DATE	INVOICE	GROSS AMOUNT	DISCOUNT	NET AMOUNT
605653	09/13/95	SIDESTRM ADMEN	250.00	0.00	250.00
Totals:USD			250.00	0.00	250.00

THE FACE OF THIS DOCUMENT HAS A MULTICOLORED BACKGROUND ON WHITE PAPER

**BUCKEYE FLORIDA, L.P.**  
 ROUTE 3, BOX 260  
 PERRY, FLORIDA 32347

SUN BANK / MID FLORIDA, N.A. 63-115  
631

DATE: 09/14/1995      CHECK NO. 0104621 115204

IN SETTLEMENT OF ACCOUNT AS FOLLOWS:

VENDOR NO.: 10203

AMOUNT:

\*\*\*\*\*\$250.00

PAY: ■ TWO HUNDRED FIFTY DOLLARS AND 00 CENTS \*\*\*\*\*


 PAY ONLY **250.00**  
 TWO FIVE ZERO CTSCTS

TO THE  
 ORDER  
 OF

**FLORIDA DEPARTMENT OF  
 ENVIRONMENTAL PROTECTION**  
 2600 BLAIR STONE ROAD  
 TALLAHASSEE, FL 32399-2400

*[Handwritten Signature]*  
 AUTHORIZED SIGNATURE



DOCUMENT	DATE	INVOICE	GROSS AMOUNT	DISCOUNT	NET AMOUNT
605653	09/13/95	SIDESTRM ADMEN	250.00	0.00	250.00
Totals:USD			250.00	0.00	250.00



**PROCTER & GAMBLE  
CELLULOSE**

*Clair*  
*fbm* 3-6-91

February 25, 1991

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

Mr. Steve Smallwood, P.E.  
Director: Division of Air  
Resources Management  
Florida Department of  
Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Fl 32399-2400

RECEIVED

FEB 28 1991

DER-1000

RE: Water Treatment Lime Slaking System  
AC 62-140034

Dear Mr. Smallwood:

In accordance with your letter dated May 9, 1990, this is to certify that the old water treatment lime slakers and associated lime storage bins have been demolished and removed from our facility. The demolition and site clearance was completed on Friday February 22, 1991. This system was operated under DER Permit # A062-138332<sup>5</sup> as Source ID# 31JAX62000127. If you have any questions please call me.

Very truly yours,

THE PROCTER & GAMBLE CELLULOSE Co.

*M. R. Perry*

M. R. Perry  
Air Systems Coordinator

CC: A. Kutyna, NE District  
S. Stevens, P&GCC



P 274 010 109

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

\* U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

John L. Sipple, Plt. Mgr.	
<del>The Buckeye Cellulose Corp.</del>	
Street and No.	
Route 3, Box 260	
P.O., State and ZIP Code	
Perry, FL 32347	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
Mailed: 02/26/88	
Permits: AC 62-140034 & 62-143536	

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address.      2.  Restricted Delivery.

3. Article Addressed to: Mr. John L. Sipple, Plant Manager The Buckeye Cellulose Corp. Route 3, Box 260 Perry, FL 32347	4. Article Number P 274 010 109
	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail
Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .	
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid)  RT. 3, Box 260 Perry, FL 32347
6. Signature - Agent X <i>Arthur Moore</i>	
7. Date of Delivery <i>2-29-88</i>	

PS Form 3811, Feb. 1986

DOMESTIC RETURN RECEIPT

*file*

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

Mr. John L. Sipple  
Plant Manager  
The Buckeye Cellulose Corporation  
Route 3, Box 260  
Perry, Florida 32347

February 26, 1988

Enclosed is permit Nos. AC 62-140034 and 62-143536, for The Buckeye Cellulose Corporation to modify its existing facility by increasing the maximum total hourly through-put rate of raw materials and chemicals into the lime slaker system (2 lime slakers), while keeping the maximum total annual through-put rate the same as the previously permitted rate, and to construct/install a baghouse control system to service the two existing water treatment lime storage bins at The Buckeye Cellulose Corporation, located in Perry, Taylor County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this 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 permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management

Copy furnished to:

- B. Stewart, N.E. Dist.
- R. Andreu, BCC
- G. Nevin, P.E., Watkins Engineering and Constructors

Final Determination

The Buckeye Cellulose Corporation  
Taylor County  
Perry, Florida

Permit Numbers:  
AC 62-140034  
AC 62-143536

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

February 24, 1988

Final Determination  
The Buckeye Cellulose Corporation  
Taylor County, Florida

The construction applications and supplementary materials have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in the Taco Times on January 13, 1988. The technical evaluation and preliminary determination (TE & PD) and draft permits were available for public inspection at the DER's Northeast District office and Bureau of Air Quality Management office.

Comments were received from Mr. Jim Farmer via a phone call on January 15, 1988, and Mr. Ray Andreu by letter dated January 20, 1988, and received January 22, 1988. The Bureau's response to their comments will follow:

Comment from Jim Farmer:

1. In Specific Condition No. 6, AC 62-140034, the "and" should be an "or" in the phrase "... storage bins and 22.0 tons..."

The Bureau accepts the request and the following will be changed:

AC 62-140034

Specific Condition No. 6

From: Lime input to the water treatment lime storage bins shall not exceed 7.0 tons per hour from the causticizing lime storage bins and 22.0 tons per hour of purchased lime from rail and/or truck.

To: Lime input to the water treatment lime storage bins shall not exceed 7.0 tons per hour from the causticizing lime storage bins or 22.0 tons per hour of purchased lime from rail and/or truck.

Comments from Ray Andreu:

1. In the TE & PD, Section I.B., Project, there is a reference to Putnam County and it should have been Taylor County.

The Bureau acknowledges this was an error. In the permits, Taylor County was correctly used.

2. Due to a typographical error, an increase in contemporaneous particulate matter emissions, used for PSD tracking, was assigned to the facility.

The Bureau agrees with the comment and, for PSD tracking purposes, the following tables in the TE & PD Section II., Rule Applicability, are revised:

From:

Table 2

Source	Net Potential Pollutant Emissions PM (TPY)
Water Treatment Lime Bins (2)	0.94
Lime Slakers (2)	0.22
Total:	1.16

Table 3

	PM Pollutant Emissions (TPY)
Existing Facility	22.99
Table 2	1.16
Total:	24.15

To:

Table 2

Source	Net Potential Pollutant Emissions PM (TPY)
Water Treatment Lime Bins (2)	0.94
Lime Slakers (2)	0.00
Total:	0.94

Table 3

	PM Pollutant Emissions (TPY)
Existing Facility	22.99
Table 2	0.94
Total:	23.93

Attachment to be Incorporated:

AC 62-140034 and -143536

No. 7. Mr. Ray Andreu's letter with attachments dated January 20, 1988, and received January 22, 1988.

The Bureau will incorporate the changes in the appropriate construction permit(s), as referenced above in the final determination. It is recommended that the construction permits be issued as drafted, with the above revisions and attachment incorporated.

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 re: *Matter of Intent*.....

.....  
was published in said newspaper in the issues of: *1/13/88*.....

.....  
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

Sworn to and subscribed before me this *13* day of *Jan*, 19*88*

*Patricia J. [Signature]*  
Notary Public

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES JAN 24, 1991  
BONDED THROUGH THE TRAVELERS

State of Florida  
Department of Environmental  
Regulation  
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to The Buckeye Cellulose Corporation to install/construct a baghouse control system to service the two existing water treatment lime storage bins and to modify the existing facility by increasing the maximum total hourly through-out rate of raw materials and chemicals into the lime slaker system (2 lime slakers), while keeping the maximum total annual through-put rate the same as the previously permitted rate. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Appleton Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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

Dept. of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation  
Northeast District Office  
3426 Bills Road  
Jacksonville, Florida 32207

Any person may send written comments on the proposed action to Mr. Bill Thomas 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.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

PERMITTEE:  
The Buckeye Cellulose Corp.  
Rt. 3, Box 260  
Perry, Florida 32347

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988  
County: Taylor  
Latitude/Longitude: 30° 03' 59" N  
83° 33' 12" W

Project: Water Treatment Lime  
Storage Bins with a Baghouse  
Control System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction/installation of a baghouse control system to serve the two (2) existing water treatment lime storage bins. The baghouse control system will be a Fuller Model 36FR8, with a design (actual) air flow rate of 1851 scfm and a penetration rate not to exceed 0.02 gr/dscf. The water treatment lime storage bins can receive lime from the causticizing lime storage bins and purchased lime from rail and truck.

The construction/installation will occur at the permittee's existing mill located approximately 5 miles southeast of Perry, Florida, off Foley Road. The UTM coordinates are Zone 17, 256.74 km East and 3328.70 km North.

The Source Classification Code is 3-05-102-05.

Construction/installation shall be in accordance with the permit application, plans, documents, and drawings, except as otherwise noted in the Specific Conditions.

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202, with Mr. Ray Andreu's cover letter and attachments dated July 21, 1987 and received July 22, 1987.
2. Mr. C. H. Fancy's letter dated August 26, 1987.
3. Application to Construct Air Pollution Sources, DER Form 17-1.202, with Mr. J. L. Sipple's cover letter and attachments dated September 11, 1987, and received September 14, 1987.
4. Mr. C. H. Fancy's letter dated October 13, 1987.
5. Document received in a December 9, 1987 meeting at the Bureau.
6. Mr. Ray Andreu's letter dated December 11, 1987, and received December 15, 1987.

**PERMITTEE:**  
The Buckeye Cellulose Corp.

**Permit Number:** AC 62-140034  
**Expiration Date:** July 31, 1988

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.



PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

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

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

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

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988

GENERAL CONDITIONS:

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988

GENERAL CONDITIONS:

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. Annual hours of operation are 8760.
2. The baghouse system associated with and controlling the emissions from the two water treatment lime storage bins shall not exhibit any visible emissions (not greater than 5% opacity). Compliance tests shall be conducted using EPA Method 9 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

**PERMITTEE:**  
The Buckeye Cellulose Corp.

**Permit Number:** AC 62-140034  
**Expiration Date:** July 31, 1988

**SPECIFIC CONDITIONS:**

3. All vehicular and railway deliveries of purchased lime to the water treatment lime storage bins shall be accounted for on an annual basis and submitted as part of the annual operating report (AOR) to the DER's Northeast District office.

4. Failure to comply with specific condition No. 2 will necessitate the requirement to perform a mass emissions test for particulate matter (PM) using EPA Methods 1, 2, 3, and 5, pursuant to 40 CFR 60, Appendix A, and FAC Rule 17-2.700. PM emissions from the water treatment lime storage bins shall not exceed 0.02 gr/dscf (0.32 lb/hr, 1.39 TPY).

5. In accordance with FAC Rule 17-2.610(3), Unconfined Emissions of PM, reasonable precautions to control emissions of unconfined PM shall include, but not be limited to the following:

- a) Reduced speeds for vehicular traffic.
- b) Use of liquid resinous adhesives or other liquid dust suppressants or wetting agents.
- c) Use of paving or other asphaltic materials.
- d) Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or otherwise by wetting prior to sweeping.
- e) Covering of trucks, trailers, front end loaders, and other vehicles or containers to prevent spillage of particulate matter during transport.
- f) Use of mulch, hydroseeding, grassing and/or other vegetative ground cover on barren areas to prevent or reduce windblown particulate matter.
- g) Use of hoods, fans, filters, and similar equipment to contain, capture, and vent particulate matter.
- h) Enclosure or covering of conveyor systems.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988

SPECIFIC CONDITIONS:

6. Lime input to the water treatment lime storage bins shall not exceed 7.0 tons per hour from the causticizing lime storage bins or 22.0 tons per hour of purchased lime from rail and/or truck.

7. Compliance of no visible emissions shall be demonstrated while the lime storage bins are receiving 7.0 tons per hour lime from the causticizing lime storage bins. Compliance of no visible emissions shall also be demonstrated while receiving 22.0 tons per hour or purchased lime from the resupply system (rail and/or truck).

8. In accordance with FAC Rule 17-2.620(2), objectionable odors shall not be allowed off plant property.

9. In accordance with FAC Rule 17-2.240, Circumvention, no person shall circumvent any air pollution control device, or allow the emissions or air pollutants without the applicable pollution control device operating properly.

10. The water treatment lime storage bins are subject to the provisions of FAC Rule 17-2.250, Excess Emissions.

11. Failure of a control system(s) to meet the applicable and maximum allowable particulate matter or visible emissions limiting standard and/or limit shall not be grounds for requesting a variance or relaxation of that standard and/or limit.

12. The lime handling system (i.e., conveyors, shutes, elevators, storage bins, etc.) shall be enclosed to minimize PM emissions.

13. The construction shall reasonably conform to the plans and schedule submitted in the application. If the applicant is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (FAC Rule 17-4.09)

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988


SPECIFIC CONDITIONS:

To obtain a permit to operate, the applicant must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's Northeast District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rules 17-4.22 and 17-4.23)

If the construction permit expires prior to the applicant requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the applicant must apply for a new permit to construct which can take up to 90 days to process a complete application. (FAC Rule 17-4.10)

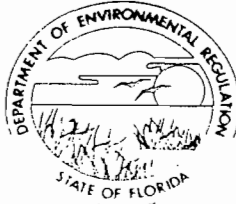
Issued this 25 day of Feb  
1988.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Wachtmann, Secretary

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

PERMITTEE:  
The Buckeye Cellulose Corp.  
Rt. 3, Box 260  
Perry, Florida 32347

Permit Number: AC 62-143536  
Expiration Date: July 31, 1988  
County: Taylor  
Latitude/Longitude: 30° 03' 59" N  
83° 33' 12" W

Project: Modification of Two Lime  
Slakers with a Condensing Scrubber  
System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modification of the two newly constructed lime slakers, which are equipped with a condensing scrubber system, to allow for an increase in the maximum total hourly through-put rate of raw materials and chemicals periodically, while keeping the maximum total annual through-put rate at the previously permitted level (see AC 62-107857).

The modification will occur at the permittee's existing mill located approximately 5 miles southeast of Perry, Florida, off Foley Road. The UTM coordinates are Zone 17, 256.74 km East and 3328.70 km North.

The Source Classification Code is 3-07-001-99.

Construction/installation shall be in accordance with the permit application, plans, documents, and drawings, except as otherwise noted in the Specific Conditions.

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202, with Mr. Ray Andreu's cover letter and attachments dated July 21, 1987 and received July 22, 1987.
2. Mr. C. H. Fancy's letter dated August 26, 1987.
3. Application to Construct Air Pollution Sources, DER Form 17-1.202, with Mr. J. L. Sipple's cover letter and attachments dated September 11, 1987, and received September 14, 1987.
4. Mr. C. H. Fancy's letter dated October 13, 1987.
5. Document received in a December 9, 1987 meeting at the Bureau.
6. Mr. Ray Andreu's letter dated December 11, 1987, and received December 15, 1987.

**PERMITTEE:**  
The Buckeye Cellulose Corp.

**Permit Number: AC 62-143536**  
**Expiration Date: July 31, 1988**

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.



**PERMITTEE:**  
The Buckeye Cellulose Corp.

**Permit Number:** AC 62-143536  
**Expiration Date:** July 31, 1988

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

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

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

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

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-143536  
Expiration Date: July 31, 1988

GENERAL CONDITIONS:

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

**PERMITTEE:**  
The Buckeye Cellulose Corp.

**Permit Number:** AC 62-143536  
**Expiration Date:** July 31, 1988

**GENERAL CONDITIONS:**

b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

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

**SPECIFIC CONDITIONS:**

1. Annual hours of operation are 8760.

2. The maximum total hourly through-put rate of raw materials and chemicals into the slaker system shall not exceed 59,240 lbs/hr (dry) of lime and 177,000 lbs/hr (dry) of green liquor solids.

3. The maximum total annual through-put rate of raw materials and chemicals into the slaker system shall not exceed 247,163 TPY (dry) of lime and 701,470 TPY (dry) of green liquor solids.

**PERMITTEE:**  
The Buckeye Cellulose Corp.

**Permit Number:** AC 62-143536  
**Expiration Date:** July 31, 1988

**SPECIFIC CONDITIONS:**

4. In accordance with FAC Rule 17-2.620(2), objectionable odors shall not be allowed off plant property.
5. In accordance with FAC Rule 17-2.240, Circumvention, no person shall circumvent any air pollution control device, or allow the emissions or air pollutants without the applicable pollution control device operating properly.
6. The lime slaker system is subject to the provisions of FAC Rule 17-2.250, Excess Emissions.
7. A scrubber system will be installed to control pollutant emissions from the lime slakers. Particulate matter (PM) emissions shall not exceed 2.08 lbs/hr and 9.13 TPY. Visible emissions (VE) shall be limited to less than 20% opacity. Compliance tests for PM shall be demonstrated using EPA Methods 1, 2, 3, and 5, in accordance with 40 CFR 60, Appendix A, and FAC Rule 17-2.700. Compliance tests for VE shall be demonstrated using EPA Method 9, in accordance with 40 CFR 60, Appendix A, and FAC Rule 17-2.700. Both initial compliance tests shall be conducted concurrently and while the causticizing system is operating at the maximum permitted hourly through-put rate of raw materials and chemicals. The test facilities for the lime slakers shall be in compliance with all applicable provisions of FAC Rule 17-2.700(4)(c). Sampling ports shall be located pursuant to FAC Rule 17-2.700(4)(c)1.c.i. Future compliance tests shall be demonstrated while operating at 90-100% of the maximum permitted rate.
8. Failure of a control system(s) to meet the applicable and maximum allowable particulate matter or visible emissions limiting standard and/or limit shall not be grounds for requesting a variance or relaxation of that standard and/or limit.
9. The lime handling system (i.e., conveyors, shutes, elevators, storage bins, etc.) shall be enclosed to minimize PM emissions.
10. A pressure gauge meter shall be installed on the scrubber system for the lime slakers to measure the scrubbing liquid supply pressure and the pressure sensor or tap is to be located close to the scrubber liquid discharge point. The monitoring device is to be certified by the manufacturer to be accurate within ± 15 percent of design scrubbing liquid supply pressure.

BEST AVAILABLE COPY

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-143536  
Expiration Date: July 31, 1988

SPECIFIC CONDITIONS:

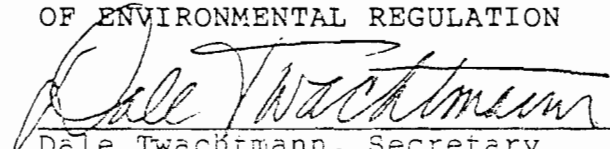
11. The construction shall reasonably conform to the plans and schedule submitted in the application. If the applicant is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (FAC Rule 17-4.09)

To obtain a permit to operate, the applicant must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's Northeast District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rules 17-4.22 and 17-4.23)

If the construction permit expires prior to the applicant requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the applicant must apply for a new permit to construct which can take up to 90 days to process a complete application. (FAC Rule 17-4.10)

Issued this 25 day of Feb,  
1988.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twacktmann, Secretary



# Interoffice Memorandum

For Routing To Other Than The Addressee

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

TO: Dale Twachtmann  
FROM: Howard L. Rhodes *HLR*  
SUBJ: Approval of The Buckeye Cellulose Corporation  
State Construction Permit Numbers: AC 62-140034  
and AC 62-143536  
DATE: February 24, 1988

Attached for your approval and signature are construction permits prepared by the Central Air Permitting staff for the above mentioned company to install/construct a baghouse control system to service two existing water treatment lime storage bins and to modify the existing facility by increasing the maximum total hourly processing rate of raw materials and chemicals into the lime slaking system (2 lime slakers), while keeping the maximum total annual processing rate the same as the previously permitted rate. The project will occur at The Buckeye Cellulose Corporation's existing facility in Perry, Taylor County, Florida. Comments were received during the public notice period.

Day 90, after which the permits will be issued by default, is April 3, 1988.

I recommend your approval and signature.

HLR/aqm/bm

attachments

RECEIVED  
FEB 24 1988

Office of the Secretary

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
INTEROFFICE MEMORANDUM

FOR ROUTING TO OTHER OFFICES AND/OR TO OTHER THAN THE ADDRESS		
To:	_____	Locn: _____
To:	_____	Locn: _____
To:	_____	Locn: _____
From:	_____	Date: _____
Reply Options	Reply Required	INTC. ONLY
Date Due: _____	Date Due: _____	

*Unable to identify -  
140034 shows a  
fee paid of \$100 but  
the refund was for  
\$800.*

TO: Air Quality

FROM: Larry Wright, Assistant Chief  
Bureau of Accounting and Budgeting *LW*

DATE: 1-26-88

SUBJECT: Refund of Fees

Your application for refund for The Buckeye Cellulose Corp.  
AC62-140034  
File # AC62-140034, is complete.

State of Florida Warrant 4 13658 38, dated 1-20-88 and  
in the amount of \$ 800.00, was mailed 1-22-88.

*April 13, 1988*

*LW/kbr: The refund was for two permits combined. The  
other permit number is AC62-143536. Each permit ~~had \$500~~  
was submitted w/\$500 and we refunded \$400 from each permit.  
Attached please find the application for refund where both permits  
were listed. The warrant numbers were already put on page 04  
of PATS for both permits. Thanks, Maggie*

Refund processed on Agency Voucher C 3662

Fiscal Year 87-88

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For routing to Director Office  
And/or To Other Than This address

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____
Priority Options: _____	Priority Required: _____
Date Due: _____	Date Due: _____

*Unable to identify -  
140134 checked a  
year period of 100 total  
the refund was for  
8800.*

TO: Air Quality

FROM: Larry Wright, Assistant Chief  
Bureau of Accounting and Budgeting

DATE: 1-26-88

SUBJECT: Refund of Fees

Your application for refund for The Buckeye Cellulose Corp.  
AC62-140034  
File # AC62-140034-1, is complete.

State of Florida Warrant: 4 13658 38, dated 1-20-88  
in the amount of \$ 800.00, was mailed 1-22-88

*April 13, 1988*

*LAW/kbf: The refund was for two permits combined. The  
other permit number is AC62-143536. Each permit ~~was~~ \$500  
was submitted w/ \$500 and we refunded \$400 from each permit.  
Attached please find the application for refund where both permits  
were listed. The warrant numbers were already put on page 04  
for PATS for both permits.*

*Sharkes, Maggie*

Refund processed on Agency Voucher C 3662

Fiscal Year 87-88



APPLICATION FOR REFUND  
FROM  
STATE OF FLORIDA

STATE OF FLORIDA )

COUNTY OF \_\_\_\_\_ )

Pursuant to the provisions of Section 215.26, or Section \_\_\_\_\_\*, Florida Statutes, I hereby apply for a refund and request that a State warrant be drawn in favor of:

NAME: The Buckeye Cellulose Corporation

ADDRESS: Route 3, Box 260

Perry, FL 32347

AMOUNT: \$800.00

which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

Reason for Claim: Over payment.

Associated with Permits AC 62-140034 & AC 62-143536; Receipt Number: 76182

Permit was a modification - created another permit and the difference owed the company is \$300.00.

CERTIFIED TRUE AND CORRECT this \_\_\_\_\_ day of \_\_\_\_\_ 19 \_\_\_\_\_

(Signature)

Must be completed if authority is other than Section 215.26, Florida Statutes.

\*\*\*\*\*

(FOR AGENCY USE ONLY)

(1) Agency recommends denial of above claim based on the following facts, including statutory authority for collection: \_\_\_\_\_

or

2) Agency recommends approval of above claim and submits the following information to substantiate such claim.

The amount recommended \$ \_\_\_\_\_.

Amount requested above was originally deposited into the State Treasury, included in State Treasurer's Receipt # \_\_\_\_\_, dated \_\_\_\_\_.

General Revenue \_\_\_\_\_

(Revenue Code)

at \_\_\_\_\_

(Name and Code Number of Trust Account)

Statutory Authority for Collection \_\_\_\_\_

as requested that payment be made from:

and of Overpayment of Taxes - General Revenue-Refunds (1-441-0211)

at \_\_\_\_\_

(Name and Code Number of Trust Account)

CERTIFIED TRUE AND CORRECT this \_\_\_\_\_ day of \_\_\_\_\_ 19 \_\_\_\_\_

(Agency)

L. Bruce Tuttle  
(Signature of Authorized Person)

Engineer IV  
(Title)

\*\*\*\*\*  
S.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE MADE TO THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE RIGHT TO A REFUND SHALL HAVE ACCRUED." SUCH RIGHT SHALL BE BARRED." Three years is interpreted as three years from the date of payment into the State Treasury.

Department of Environmental Regulation

Daily Cash Listing # 9

Date Received 09-15-87

Dep # 2018

Bureau of Accounting & Budgeting (Revenue Section)

Date Bureau of Air Quality Received \_\_\_\_\_

Lister's Signature Lil Sweeney

Signature of Receiver Maggie Jones 9/30/87

REMITTED BY	CHECK NUMBER	AMOUNT	RECEIPT NUMBER	REVENUE CODE	FILE NUMBER
The Buckeye Cellulose Corporation	# 001533	\$ 1,000.00	76182	001031	AC 62-140034 62-143536 (m)
		\$1,000.00			

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Revenue Section  
Bureau of Accounting and Budgeting

FROM: Cost Center \_\_\_\_\_ Air Quality

SUBJECT: Cash Listing Number # 9 Dated 09-15-87

The cash listing received from your office has been checked and confirmed to be correct in all areas.

9/18/87  
Date

Naggie Jones  
Signature of verifying party

The cash listing received from your office has been checked and found to contain one or more discrepancies. A corrected cash listing is attached. Please adjust your records accordingly.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of verifying party

Number of remittances in this cash listing 1.

BEST AVAILABLE COPY

The Buckeye Cellulose Corporation

A Procter & Gamble Company  
Foley Mill Account  
Perry, Florida 32347

SOUTHEAST BANK OF FLORIDA  
200 West Main St.  
Perry, Florida 32347  
63-131/631

00153

09/11/87

\*\*\*\*\*1,000.00\*\*\*\*\*

IN SETTLEMENT OF YOUR ACCOUNT AS FOLLOWS:

Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 31399-2400

ck001533

PAY  
TO THE  
ORDER  
OF

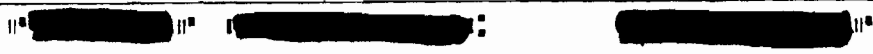
Permit #AC62-107857  
#AC62-107858

PAY

1000000000

*J.P. Andrews*  
AUTHORIZED COUNTERSIGNATURE

*[Signature]*  
AUTHORIZED SIGNATURE



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

Nº 76182

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from The Buckeye Cellulose Corp. Date Sept. 18, 1987

Address Rt. 3, Box 260, Perry, FL 32347 Dollars \$ 1,000.00

Applicant Name & Address John L. Supple, Plant Mgr. / same address as above

Source of Revenue  # 001533

Revenue Code 001030 Application Number AC 62-140034

By *R Bruce White*

modification request inquiry package dated 7/21/87. Our explanation of these items are as follows:

1. Slaker Rate Increase

We have requested a small increase in allowable slaking rate (less than 10% increase in rate vs. original application) to reflect the actual peak rate performance capability. This additional capability is a result of the normal variability of "real life" conditions versus good engineering practice design calculations for the green liquor feed pumps. The requested increase is still well within the design capability of the slakers' system and their air emissions control device. This was verified during the compliance verification process. In fact, the design for the two Model No. 18 slakers and control device utilized in this project could accommodate rates well in excess of the installed green liquor flow capability.

In addition, the requested slaker rate actually represents approximately 95% of our previous slaking capability. As a result, the total mass balance concern regarding the other pulping systems is not relevant.

We would like to assure you that our present slaker operation is consistent with the requirements and limitations contained in the original construction permit.

The higher slaker rate being requested is attractive to us in terms of system maintainability. The additional capability will enhance our liquor inventory recovery capability following extended causticizing system downtime periods.

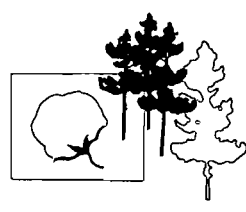
001031

RECEIVED  
DEF - MAIL ROOM  
1987 SEP 15 AM 10:31

PM  
20 Jan 1988  
Perry, FL

File Copy

First in cellulose



# The Buckeye Cellulose Corporation

A Procter and Gamble Company

Mailing Address: Route 3 Box 260 Perry, Florida 32347 Phone: (904) 584-0121

January 20, 1988

DER

JAN 22

BAQM

Mr. Bill A. Thomas, P.E.  
Bureau of Air Quality Management  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Permit Numbers AC62-140034 and AC62-143536

Dear Mr. Thomas:

As we discussed with Mr. Bruce Mitchell, there are two minor corrections that need to be made to the proposed construction permit modifications referenced above, which were received from the DER on 1/8/88. The needed corrections are as follows:

- 1) On page 1, B., Putnam County needs to be changed to Taylor County (see Attachment I).
- 2) The second change is to remove the 0.22 TPY in Table 2 and Table 3 of Attachment I, page 3. In an effort to correct a typographical error in the original construction permit, see Attachment III, where 2.03 lb/hr should have been 2.08 lb/hr, it was erroneously assumed by DER that this was also a math error. The 2.08 lb/hr and 9.13 TPY were the maximum potential emissions used in our original permit application and we have not requested any change in these (see Attachment II). The 9.13 TPY maximum potential emissions is correctly used in Attachments II and III and in Table 1, Attachment I, page 2. Therefore there is no potential emissions increase involved, just a typographical error correction.

Thank you for your consideration of these items. If you have any questions, please call me at (904) 584-0347.

Very truly yours,

THE BUCKEYE CELLULOSE CORPORATION  
a Procter & Gamble Company

R. Andreu  
Environmental Control Manager

RA:msw  
3156L  
Attachments

Copied: CHF/BT  
Bruce Mitchell

cc: Mr. Bruce Mitchell  
Bureau of Air Quality Management  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**The Buckeye Cellulose Corporation**

A Procter & Gamble Company

Rt. 3, B260 Perry, Florida 32347-9512



*First in cellulose*

**DER**

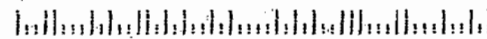
**JAN 22**

**BAQM**

8311  
0801  
8111  
3811



Mr. Bill A. Thomas, P.E.  
Bureau of Air Quality Management  
Florida DER  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400



Attachment I

Technical Evaluation  
and  
Preliminary Determination

DER  
JAN 22  
BAQM

The Buckeye Cellulose Corporation  
Taylor County  
Perry, Florida

Permit Numbers:  
AC 62-140034  
AC 62-143536

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

January 6, 1988

I. Project Description

A. Applicant

The Buckeye Cellulose Corporation  
Route 3, Box 260  
Perry, Florida 32347

B. Project

The applicant proposes to modify the facility by increasing the permitted maximum total hourly through-put rate of the raw materials and chemicals into the slaker system, while keeping the maximum total annual through-put rate at the previously permitted rate. Also, the applicant requests a permit for a new baghouse control system that has already been installed on the two existing water treatment storage bins.

The modification will occur at the applicant's existing facility located in Putnam County, Florida. The UTM coordinates are Zone 17, 256.74 km East and 3328.70 km North.

Taylor County

C. Process and Controls

The recently constructed slaker system's (two lime slakers) input rate of raw materials and chemicals was permitted at a projected maximum rate. Upon compliance testing, the mill found that the slaker system can process higher rates of the raw materials and chemicals (approximately 10%) and have requested this capability.

Since compliance tests on the recently constructed slaker-system have been conducted at the requested increased through-put rate of raw materials and chemicals, the Bureau will agree to permitting the following:

- 1) The maximum total hourly through-put rate of raw materials and chemicals into the slaker system shall not exceed 59,240 lbs/hr (dry) of lime and 177,000 lbs/hr (dry) of green liquor solids; and,
- 2) The maximum total annual through-put rate of raw materials and chemicals into the slaker system shall not exceed 247,163 TPY (dry) of lime and 701,470 TPY (dry) of green liquor solids (the annual rates are based on the previous permitted maximum through-put rates: see AC 62-107857).

The slaker system is a source of particulate matter (PM) emissions and a wet scrubber system was installed to control these emissions.

The applicant, during the construction of the new causticizing system, replaced the existing baghouse system with a new baghouse system, which controls PM emissions arising from the



water treatment lime storage bins (2) while being filled with purchased lime (rail or truck) or lime from the causticizing lime bins (2). The lime bins can receive a maximum of 22.0 tons per hour (TPH) of purchased lime by rail and/or truck and a maximum of 7.0 TPH of lime from the causticizing lime bins.

The new baghouse control system installed is a Fuller Model 36FR8, with a design (actual) air flow of rate of 1851 scfm and a penetration rate not to exceed 0.02 grains per dry standard cubic feet (gr/dscf), which is also the allowable emission rate for PM.

## II. Rule Applicability

The proposal is subject to preconstruction review pursuant to Florida Administrative Code (FAC) Rules 17-2 and 17-4, and Chapter 403, Florida Statutes.

The application packages were deemed complete on December 15, 1987.

The existing facility is major for all criteria pollutants in accordance with FAC Rule 17-2.100(111).

The existing facility is located in an area designated attainment for all criteria pollutants in accordance with FAC Rules 17-2.410 and 17-2.420.

The following table will reflect the proposed modification's maximum potential pollutant emissions:

Source	Maximum Potential Pollutant Emissions PM (TPY)
Water Treatment Lime Bins	1.39*
Lime Slaker	9.13°

Note:\* Based on 0.02 gr/dscf and 1851 scfm; 8760 hrs/yr

° Based on 2.08 lbs/hr (50 lbs/day); 8760 hrs/yr

The following table will reflect the net change in pollutant emissions from previously permitted and projected emission levels:

Table 2

Source	Net Potential Pollutant Emissions PM (TPY)
Water Treatment Lime Bins (2)	0.94
<del>Lime Slakers (2)</del>	<del>0.22</del>
	<del>Total: 1.16</del>

The following table will reflect the total net contemporaneous PM emissions changes at the mill, which is to be used for prevention of significant deterioration (PSD) tracking purposes:

Table 3

	PM Pollutant Emissions (TPY)
Existing Facility	22.99
Table 2	<del>1.16</del>
	<del>0.94</del>
Total:	<del>24.15</del> <u>23.93</u>

Note: See Tables 1, 2, 3, and 4 in the Technical Evaluation and Preliminary Determination for the Construction Permits Nos. AC 62-107857 and -107858.

Based on Tables 2 and 3, the emissions of the proposed modification to the existing facility are not subject to new source review pursuant to FAC Rule 17-2.500(5) in accordance with FAC Rule 17-2.500(2)(d)3. Therefore, the proposed emissions shall be reviewed pursuant to FAC Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Review.

Since there are no specific source emission limiting standard(s) contained in FAC Rules 17-2.600 or 17-2.660, the sources are subject to the provisions of FAC Rule 17-2.610, General Particulate Emission Limiting Standards. However, the applicant requested an allowable PM emissions rate of 0.02 gr/dscf as a measure to avoid triggering PSD new source review and the Department has accepted their request.

Also, the applicant has requested an allowable visible emissions (VE) standard of no visible emissions (not greater than 5% opacity) in lieu of performing a mass emissions compliance test for PM on the water treatment lime storage bins. However, the Department will require a mass compliance test for PM if the VE standard is exceeded. Therefore, the Department supports the VE standard as a demonstration of reasonable assurance and will maintain a tracking record of the potential pollutant emissions from these sources for PSD review purposes.

A meter was to be installed to measure the scrubbing liquid supply pressure on the slaker scrubber system and the pressure sensor or tap was to be located close to the scrubber liquid

*Attachment II*

I. NEW SLAKERS

A. PARTICULATE MATTER EMISSIONS

1. MAXIMUM EMISSIONS

Based on one slaker vendor's information, total particulate emissions from slaking would be 5.0 lb/day. Other vendors could vary from this level. Therefore, maximum emissions are calculated at ten times this level.

$$5.0 \text{ lb/day} \times 10 / 24 \text{ hr/day} = 2.08 \text{ lb/hr PM}$$

$$2.08 \text{ lb/hr} \times 8,760 \text{ hr/yr} / 2,000 \text{ lb/ton} = 9.13 \text{ TPY PM}$$

2. ALLOWABLE EMISSIONS

Based on process weight table,  $E = 17.31 P^{0.16}$  for  $P > 30$  TPH  
Input to slakers consists of green liquor (Stream 1) and lime (Stream 3).

$$\begin{aligned} \text{Maximum green liquor solids to slaking (Streams 1a plus 1b)} \\ = 160,153 \text{ lb/hr} = 80.08 \text{ TPH} \end{aligned}$$

$$\begin{aligned} \text{Maximum lime product to slaking (Streams 3a plus 3b)} \\ = 56,430 \text{ lb/hr} = 28.22 \text{ TPH} \end{aligned}$$

$$\text{Maximum total process input rate} = 108.29 \text{ TPH}$$

$$E = 17.31 (108.29)^{0.16} = 36.6 \text{ lb/hr PM}$$

3. POTENTIAL EMISSIONS

Scrubber on slakers rated at 90% or greater efficiency

$$2.08 \text{ lb/hr} / 0.10 = 20.8 \text{ lb/hr} = 91.2 \text{ TPY PM}$$

B. PRODUCT RATE

Slakers product rate = Lime mud + white liquor

ports shall be located pursuant to FAC Rule 17-2.700(4)(c)1.c.i.

TO: A scrubber system will be installed to control pollutant emissions from the lime slakers. PM emissions shall not exceed 2.03 lb/hr and 9.13 TPY. Visible emissions shall be limited to less than 20% opacity. Compliance tests for PM shall be demonstrated using EPA Methods 1, 2, 3, and 5, in accordance with 40 CFR 60, Appendix A, and FAC Rule 17-2.700. Both initial compliance tests shall be conducted concurrently and while the causticizing system is operating at an equivalent rate of 27.08 tons per hour not to exceed lime product feed from the causticizing lime bin(s) and green liquor. The test facilities for the lime slakers shall comply with all applicable provisions of FAC Rule 17-2.700(4)(c). Sampling ports shall be located pursuant to FAC Rule 17-2.700(4)(c)1.c.i. Future compliance tests shall be demonstrated while operating at 90-100% of the maximum permitted rate.

6. The bureau agrees and the following changes shall be made:

No. 14:

FROM: Failure of a control system(s) to meet the applicable and maximum allowable pollutant emissions limiting standard and/or limit shall not be grounds for requesting a variance or relaxation of that standard and/or limit.

TO: Failure of a control system(s) to meet the applicable and maximum allowable particulate matter or visible emissions limiting standard and/or limit shall not be grounds for requesting a variance or relaxation of that standard and/or limit.

Attachment to be incorporated:

AC 62-107858

No. 4. Mr. John H. Millican's comments dated November 21, 1985.

AC 62-107857

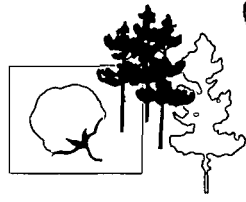
No. 2. Mr. John H. Millican's comments dated November 21, 1985.

The bureau will incorporate the changes to the cover page and the Specific Conditions in the construction permits, Nos. AC 62-107858 and AC 62-107857, as referenced above in the Final Determination. It is recommended that the construction permit be issued as drafted, with the above revisions and attachment incorporated.

PM  
1-14-88  
Perry, FL

File Copy

First in cellulose



# The Buckeye Cellulose Corporation

A Procter and Gamble Company

Mailing Address: Route 3 Box 260 Perry, Florida 32347 Phone: (904) 584-0121

January 14, 1988

DER

JAN 15, 1988 (m)

BAQM

Mr. Clair H. Fancy  
Deputy Chief BAQM  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

This is to provide the required notice, pursuant to Section 403.815, FS & DER Rule 17-103.150, FAC, that The Buckeye Cellulose Corporation has published the Notice of Proposed Agency Action on permit applications AC62-140034 and AC62-143536. The proof of publication is enclosed.

Very truly yours,

THE BUCKEYE CELLULOSE CORPORATION  
a Procter & Gamble Company

Ray Andreu  
Environmental Control Manager

RA/JEF:msw  
3145L  
Enclosure

Bill Stewart / Johnny Cole NE Dist. } 1-19-88  
Bruce Mitchell

**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 re: *notice of intent*.....

.....  
 was published in said newspaper in the issues of: *1/13/88*.....

.....  
 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

Sworn to and subscribed before me this *13* day of *Jan*, 19*88*

*[Signature]*  
 Notary Public  
 NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
 MY COMMISSION EXPIRES JAN. 24, 1991  
 BONDED THROUGH THE TRAVELERS

State of Florida  
 Department of Environmental  
 Regulation  
 Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to The Buckeye Cellulose Corporation to install/construct a baghouse control system to service the two existing water treatment lime storage bins and to modify the existing facility by increasing the maximum total hourly through-out rate of raw materials and chemicals into the lime slaker system (2 lime slakers), while keeping the maximum total annual through-put rate the same as the previously permitted rate. The Department is issuing this intent to issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Rd., Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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

Dept. of Environmental Regulation  
 Bureau of Air Quality Management  
 2600 Blair Stone Rd.  
 Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation  
 Northeast District Office  
 3426 Bills Road  
 Jacksonville, Florida 32207

Any person may send written comments on the proposed action to Mr. Bill Thomas 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.

P 274 010 481

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

U.S.G.P.O. 1985-480-794

Mr. John L. Sipple, Plant Mgr. The Buckeye Cellulose Corp. Route 3, Box 260	
P.O., State and ZIP Code Perry, FL 32347	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 01-07-88 Permits: AC 62-140034 62-143536	

PS Form 3800, June 1985

PS Form 3811, July 1983 447-845

**SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to: Mr. John L. Sipple  
Plant Manager  
The Buckeye Cellulose Corporation  
Route 3, Box 260  
Perry, FL 32347

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 274 010 481

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee  
X
6. Signature - Agent  
X *Marilyn Collins*
7. Date of Delivery  
*1-8-88*
8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

file

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

January 7, 1987<sup>db</sup>

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. John L. Sipple  
Plant Manager  
The Buckeye Cellulose Corporation  
Route 3, Box 260  
Perry, Florida 32347

Dear Mr. Sipple:

Attached is one copy of the Technical Evaluation and Preliminary Determinations and proposed permits for The Buckeye Cellulose Corporation to modify its existing facility by increasing the maximum total hourly through-put rate of raw materials and chemicals into the lime slaker system (2 lime slakers), while keeping the maximum total annual through-put rate the same as the previously permitted rate, and to construct/install a baghouse control system to service the two existing water treatment lime storage bins.

Please submit, in writing, any comments which you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/bm

Attachments

cc: B. Stewart, N.E. Dist.  
R. Andreu, BCC  
G. Nevin, P.E., Watkins Engineers and Constructors



BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Applications for Permits by:

The Buckeye Cellulose Corporation  
Route 3, Box 260  
Perry, Florida 32347

DER File Nos. AC 62-140034  
62-143536

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INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue permits (copies attached) for the proposed project as detailed in the applications specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, The Buckeye Cellulose Corporation, applied on September 14, 1987, to the Department of Environmental Regulation for permits to construct/install a baghouse control system to service the two existing water treatment lime storage bins and to modify the existing facility by increasing the maximum total hourly through-put rate of raw materials and chemicals into the lime slaker system (2 lime slakers), while keeping the maximum total annual through-put rate the same as the previously permitted rate, at the applicant's existing mill off Foley Road in Perry, Taylor County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits were needed for the proposed work.


Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit applications. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of

the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless 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, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copy enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. 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, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



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C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

Copies furnished to:

- B. Stewart, N.E. Dist.
- R. Andreu, BCC
- G. Nevin, P.E., Watkins Engineers and Constructors

RULES OF THE ADMINISTRATIVE COMMISSION  
MODEL RULES OF PROCEDURE  
CHAPTER 28-5  
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
  - (a) The name and address of each agency affected and each agency's file or identification number, if known;
  - (b) The name and address of the petitioner or petitioners;
  - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
  - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
  - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
  - (f) A demand for the relief to which the petitioner deems himself entitled; and
  - (g) Such other information which the petitioner contends is material.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 1-7-88.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Matthew White 1-7-88  
Clerk Date

State of Florida  
Department of Environmental Regulation  
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to The Buckeye Cellulose Corporation to install/construct a baghouse control system to service the two existing water treatment lime storage bins and to modify the existing facility by increasing the maximum total hourly through-put rate of raw materials and chemicals into the lime slaker system (2 lime slakers), while keeping the maximum total annual through-put rate the same as the previously permitted rate. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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

Dept. of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation  
Northeast District Office  
3426 Bills Road  
Jacksonville, Florida 32207

Any person may send written comments on the proposed action to Mr. Bill Thomas 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 Buckeye Cellulose Corporation  
Taylor County  
Perry, Florida

Permit Numbers:  
AC 62-140034  
AC 62-143536

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

January 6, 1988

## I. Project Description

### A. Applicant

The Buckeye Cellulose Corporation  
Route 3, Box 260  
Perry, Florida 32347

### B. Project

The applicant proposes to modify the facility by increasing the permitted maximum total hourly through-put rate of the raw materials and chemicals into the slaker system, while keeping the maximum total annual through-put rate at the previously permitted rate. Also, the applicant requests a permit for a new baghouse control system that has already been installed on the two existing water treatment storage bins.

The modification will occur at the applicant's existing facility located in Putnam County, Florida. The UTM coordinates are Zone 17, 256.74 km East and 3328.70 km North.

### C. Process and Controls

The recently constructed slaker system's (two lime slakers) input rate of raw materials and chemicals was permitted at a projected maximum rate. Upon compliance testing, the mill found that the slaker system can process higher rates of the raw materials and chemicals (approximately 10%) and have requested this capability.

Since compliance tests on the recently constructed slaker system have been conducted at the requested increased through-put rate of raw materials and chemicals, the Bureau will agree to permitting the following:

- 1) The maximum total hourly through-put rate of raw materials and chemicals into the slaker system shall not exceed 59,240 lbs/hr (dry) of lime and 177,000 lbs/hr (dry) of green liquor solids; and,
- 2) The maximum total annual through-put rate of raw materials and chemicals into the slaker system shall not exceed 247,163 TPY (dry) of lime and 701,470 TPY (dry) of green liquor solids (the annual rates are based on the previous permitted maximum through-put rates: see AC 62-107857).

The slaker system is a source of particulate matter (PM) emissions and a wet scrubber system was installed to control these emissions.

The applicant, during the construction of the new causticizing system, replaced the existing baghouse system with a new baghouse system, which controls PM emissions arising from the



water treatment lime storage bins (2) while being filled with purchased lime (rail or truck) or lime from the causticizing lime bins (2). The lime bins can receive a maximum of 22.0 tons per hour (TPH) of purchased lime by rail and/or truck and a maximum of 7.0 TPH of lime from the causticizing lime bins.

The new baghouse control system installed is a Fuller Model 36FR8, with a design (actual) air flow of rate of 1851 scfm and a penetration rate not to exceed 0.02 grains per dry standard cubic feet (gr/dscf), which is also the allowable emission rate for PM.

## II. Rule Applicability

The proposal is subject to preconstruction review pursuant to Florida Administrative Code (FAC) Rules 17-2 and 17-4, and Chapter 403, Florida Statutes.

The application packages were deemed complete on December 15, 1987.

The existing facility is major for all criteria pollutants in accordance with FAC Rule 17-2.100(111).

The existing facility is located in an area designated attainment for all criteria pollutants in accordance with FAC Rules 17-2.410 and 17-2.420.

The following table will reflect the proposed modification's maximum potential pollutant emissions:

Table 1	
Source	Maximum Potential Pollutant Emissions PM (TPY)
Water Treatment Lime Bins	1.39*
Lime Slaker	9.13°

Note: \* Based on 0.02 gr/dscf and 1851 scfm; 8760 hrs/yr

° Based on 2.08 lbs/hr (50 lbs/day); 8760 hrs/yr

The following table will reflect the net change in pollutant emissions from previously permitted and projected emission levels:

Table 2

Source	Net Potential Pollutant Emissions PM (TPY)
Water Treatment Lime Bins (2)	0.94
Lime Slakers (2)	0.22
Total:	<u>1.16</u>

The following table will reflect the total net contemporaneous PM emissions changes at the mill, which is to be used for prevention of significant deterioration (PSD) tracking purposes:

Table 3	
PM Pollutant Emissions (TPY)	
Existing Facility	22.99
Table 2	<u>1.16</u>
Total:	<u>24.15</u>

Note: See Tables 1, 2, 3, and 4 in the Technical Evaluation and Preliminary Determination for the Construction Permits Nos. AC 62-107857 and -107858.

Based on Tables 2 and 3, the emissions of the proposed modification to the existing facility are not subject to new source review pursuant to FAC Rule 17-2.500(5) in accordance with FAC Rule 17-2.500(2)(d)3. Therefore, the proposed emissions shall be reviewed pursuant to FAC Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Review.

Since there are no specific source emission limiting standard(s) contained in FAC Rules 17-2.600 or 17-2.660, the sources are subject to the provisions of FAC Rule 17-2.610, General Particulate Emission Limiting Standards. However, the applicant requested an allowable PM emissions rate of 0.02 gr/dscf as a measure to avoid triggering PSD new source review and the Department has accepted their request.

Also, the applicant has requested an allowable visible emissions (VE) standard of no visible emissions (not greater than 5% opacity) in lieu of performing a mass emissions compliance test for PM on the water treatment lime storage bins. However, the Department will require a mass compliance test for PM if the VE standard is exceeded. Therefore, the Department supports the VE standard as a demonstration of reasonable assurance and will maintain a tracking record of the potential pollutant emissions from these sources for PSD review purposes.

A meter was to be installed to measure the scrubbing liquid supply pressure on the slaker scrubber system and the pressure sensor or tap was to be located close to the scrubber liquid

discharge point. The monitoring device was to be certified by the manufacturer to be accurate within + 15 percent of design scrubbing liquid supply pressure.

### III. Summary of Emissions

#### A. Emission Limitations

The regulated pollutant emissions from the proposed modification are visible emissions (VE) and particulate matter (PM) emissions. The following table will reflect the maximum allowable emissions standards and limits applicable to the proposed modification:

Table 4

Source	Pollutant	Maximum Allowable Emission Standards/Limit
Water Treatment Lime Bins (2)	VE	No Visible Emissions (not greater than 5% opacity)
Lime Slakers (2)	PM	Not to Exceed 2.08 lbs/hr and 9.13 TPY (total)
	VE	Not to Exhibit 20% opacity or greater

#### B. Air Quality Analysis

From a technical review of the application package and its amendments, an air quality analysis is not required.

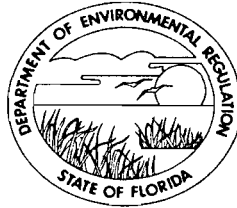
### IV. Conclusion

The allowable pollutant emission limiting standards and limits from the proposed modification should not cause any violation to Florida's ambient air quality standards.

The General and Specific Conditions listed in the proposed permits (attached) will assure compliance with both the state and federal standards.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

PERMITTEE:  
The Buckeye Cellulose Corp.  
Rt. 3, Box 260  
Perry, Florida 32347

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988  
County: Taylor  
Latitude/Longitude: 30° 03' 59" N  
83° 33' 12" W

Project: Water Treatment Lime  
Storage Bins with a Baghouse  
Control System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction/installation of a baghouse control system to serve the two (2) existing water treatment lime storage bins. The baghouse control system will be a Fuller Model 36FR8, with a design (actual) air flow rate of 1851 scfm and a penetration rate not to exceed 0.02 gr/dscf. The water treatment lime storage bins can receive lime from the causticizing lime storage bins and purchased lime from rail and truck.

The construction/installation will occur at the permittee's existing mill located approximately 5 miles southeast of Perry, Florida, off Foley Road. The UTM coordinates are Zone 17, 256.74 km East and 3328.70 km North.

The Source Classification Code is 3-05-102-05.

Construction/installation shall be in accordance with the permit application, plans, documents, and drawings, except as otherwise noted in the Specific Conditions.

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202, with Mr. Ray Andreu's cover letter and attachments dated July 21, 1987 and received July 22, 1987.
2. Mr. C. H. Fancy's letter dated August 26, 1987.
3. Application to Construct Air Pollution Sources, DER Form 17-1.202, with Mr. J. L. Sipple's cover letter and attachments dated September 11, 1987, and received September 14, 1987.
4. Mr. C. H. Fancy's letter dated October 13, 1987.
5. Document received in a December 9, 1987 meeting at the Bureau.
6. Mr. Ray Andreu's letter dated December 11, 1987, and received December 15, 1987.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

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

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

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

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988

**GENERAL CONDITIONS:**

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988

**GENERAL CONDITIONS:**

b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

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

**SPECIFIC CONDITIONS:**

1. Annual hours of operation are 8760.

2. The baghouse system associated with and controlling the emissions from the two water treatment lime storage bins shall not exhibit any visible emissions (not greater than 5% opacity). Compliance tests shall be conducted using EPA Method 9 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.



PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988

**SPECIFIC CONDITIONS:**

3. All vehicular and railway deliveries of purchased lime to the water treatment lime storage bins shall be accounted for on an annual basis and submitted as part of the annual operating report (AOR) to the DER's Northeast District office.

4. Failure to comply with specific condition No. 2 will necessitate the requirement to perform a mass emissions test for particulate matter (PM) using EPA Methods 1, 2, 3, and 5, pursuant to 40 CFR 60, Appendix A, and FAC Rule 17-2.700. PM emissions from the water treatment lime storage bins shall not exceed 0.02 gr/dscf (0.32 lb/hr, 1.39 TPY).

5. In accordance with FAC Rule 17-2.610(3), Unconfined Emissions of PM, reasonable precautions to control emissions of unconfined PM shall include, but not be limited to the following:

- a) Reduced speeds for vehicular traffic.
- b) Use of liquid resinous adhesives or other liquid dust suppressants or wetting agents.
- c) Use of paving or other asphaltic materials.
- d) Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or otherwise by wetting prior to sweeping.
- e) Covering of trucks, trailers, front end loaders, and other vehicles or containers to prevent spillage of particulate matter during transport.
- f) Use of mulch, hydroseeding, grassing and/or other vegetative ground cover on barren areas to prevent or reduce windblown particulate matter.
- g) Use of hoods, fans, filters, and similar equipment to contain, capture, and vent particulate matter.
- h) Enclosure or covering of conveyor systems.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988

SPECIFIC CONDITIONS:

6. Lime input to the water treatment lime storage bins shall not exceed 7.0 tons per hour from the causticizing lime storage bins and 22.0 tons per hour of purchased lime from rail and/or truck.

7. Compliance of no visible emissions shall be demonstrated while the lime storage bins are receiving 7.0 tons per hour lime from the causticizing lime storage bins. Compliance of no visible emissions shall also be demonstrated while receiving 22.0 tons per hour or purchased lime from the resupply system (rail and/or truck).

8. In accordance with FAC Rule 17-2.620(2), objectionable odors shall not be allowed off plant property.

9. In accordance with FAC Rule 17-2.240, Circumvention, no person shall circumvent any air pollution control device, or allow the emissions or air pollutants without the applicable pollution control device operating properly.

10. The water treatment lime storage bins are subject to the provisions of FAC Rule 17-2.250, Excess Emissions.

11. Failure of a control system(s) to meet the applicable and maximum allowable particulate matter or visible emissions limiting standard and/or limit shall not be grounds for requesting a variance or relaxation of that standard and/or limit.

12. The lime handling system (i.e., conveyors, shutes, elevators, storage bins, etc.) shall be enclosed to minimize PM emissions.

13. The construction shall reasonably conform to the plans and schedule submitted in the application. If the applicant is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (FAC Rule 17-4.09)

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-140034  
Expiration Date: July 31, 1988

**SPECIFIC CONDITIONS:**

To obtain a permit to operate, the applicant must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's Northeast District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rules 17-4.22 and 17-4.23)

If the construction permit expires prior to the applicant requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the applicant must apply for a new permit to construct which can take up to 90 days to process a complete application. (FAC Rule 17-4.10)

Issued this \_\_\_\_\_ day of \_\_\_\_\_  
19\_\_\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Dale Twachtmann, Secretary

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

PERMITTEE:  
The Buckeye Cellulose Corp.  
Rt. 3, Box 260  
Perry, Florida 32347

Permit Number: AC 62-143536  
Expiration Date: July 31, 1988  
County: Taylor  
Latitude/Longitude: 30° 03' 59" N  
83° 33' 12" W  
Project: Modification of Two Lime  
Slakers with a Condensing Scrubber  
System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modification of the two newly constructed lime slakers, which are equipped with a condensing scrubber system, to allow for an increase in the maximum total hourly through-put rate of raw materials and chemicals periodically, while keeping the maximum total annual through-put rate at the previously permitted level (see AC 62-107857).

The modification will occur at the permittee's existing mill located approximately 5 miles southeast of Perry, Florida, off Foley Road. The UTM coordinates are Zone 17, 256.74 km East and 3328.70 km North.

The Source Classification Code is 3-07-001-99.

Construction/installation shall be in accordance with the permit application, plans, documents, and drawings, except as otherwise noted in the Specific Conditions.

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202, with Mr. Ray Andreu's cover letter and attachments dated July 21, 1987 and received July 22, 1987.
2. Mr. C. H. Fancy's letter dated August 26, 1987.
3. Application to Construct Air Pollution Sources, DER Form 17-1.202, with Mr. J. L. Sipple's cover letter and attachments dated September 11, 1987, and received September 14, 1987.
4. Mr. C. H. Fancy's letter dated October 13, 1987.
5. Document received in a December 9, 1987 meeting at the Bureau.
6. Mr. Ray Andreu's letter dated December 11, 1987, and received December 15, 1987.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-143536  
Expiration Date: July 31, 1988

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-143536  
Expiration Date: July 31, 1988

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

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

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

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

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-143536  
Expiration Date: July 31, 1988

**GENERAL CONDITIONS:**

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-143536  
Expiration Date: July 31, 1988

**GENERAL CONDITIONS:**

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

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

**SPECIFIC CONDITIONS:**

1. Annual hours of operation are 8760.
2. The maximum total hourly through-put rate of raw materials and chemicals into the slaker system shall not exceed 59,240 lbs/hr (dry) of lime and 177,000 lbs/hr (dry) of green liquor solids.
3. The maximum total annual through-put rate of raw materials and chemicals into the slaker system shall not exceed 247,163 TPY (dry) of lime and 701,470 TPY (dry) of green liquor solids.



PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-143536  
Expiration Date: July 31, 1988

**SPECIFIC CONDITIONS:**

4. In accordance with FAC Rule 17-2.620(2), objectionable odors shall not be allowed off plant property.

5. In accordance with FAC Rule 17-2.240, Circumvention, no person shall circumvent any air pollution control device, or allow the emissions or air pollutants without the applicable pollution control device operating properly.

6. The lime slaker system is subject to the provisions of FAC Rule 17-2.250, Excess Emissions.

7. A scrubber system will be installed to control pollutant emissions from the lime slakers. Particulate matter (PM) emissions shall not exceed 2.08 lbs/hr and 9.13 TPY. Visible emissions (VE) shall be limited to less than 20% opacity. Compliance tests for PM shall be demonstrated using EPA Methods 1, 2, 3, and 5, in accordance with 40 CFR 60, Appendix A, and FAC Rule 17-2.700. Compliance tests for VE shall be demonstrated using EPA Method 9, in accordance with 40 CFR 60, Appendix A, and FAC Rule 17-2.700. Both initial compliance tests shall be conducted concurrently and while the causticizing system is operating at the maximum permitted hourly through-put rate of raw materials and chemicals. The test facilities for the lime slakers shall be in compliance with all applicable provisions of FAC Rule 17-2.700(4)(c). Sampling ports shall be located pursuant to FAC Rule 17-2.700(4)(c)l.c.i. Future compliance tests shall be demonstrated while operating at 90-100% of the maximum permitted rate.

8. Failure of a control system(s) to meet the applicable and maximum allowable particulate matter or visible emissions limiting standard and/or limit shall not be grounds for requesting a variance or relaxation of that standard and/or limit.

9. The lime handling system (i.e., conveyors, shutes, elevators, storage bins, etc.) shall be enclosed to minimize PM emissions.

10. A pressure gauge meter shall be installed on the scrubber system for the lime slakers to measure the scrubbing liquid supply pressure and the pressure sensor or tap is to be located close to the scrubber liquid discharge point. The monitoring device is to be certified by the manufacturer to be accurate within  $\pm 15$  percent of design scrubbing liquid supply pressure.

PERMITTEE:  
The Buckeye Cellulose Corp.

Permit Number: AC 62-143536  
Expiration Date: July 31, 1988

**SPECIFIC CONDITIONS:**

11. The construction shall reasonably conform to the plans and schedule submitted in the application. If the applicant is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (FAC Rule 17-4.09)

To obtain a permit to operate, the applicant must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's Northeast District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rules 17-4.22 and 17-4.23)

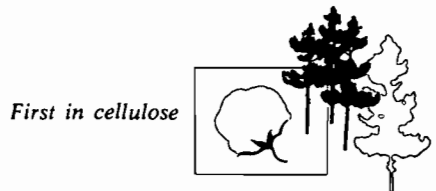
If the construction permit expires prior to the applicant requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the applicant must apply for a new permit to construct which can take up to 90 days to process a complete application. (FAC Rule 17-4.10)

Issued this \_\_\_\_\_ day of \_\_\_\_\_,  
19\_\_\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Dale Twachtmann, Secretary

AC 62-140034  
AC 62-107857-58



# The Buckeye Cellulose Corporation

A Procter and Gamble Company

Mailing Address: Route 3 Box 260 Perry, Florida 32347 Phone: (904) 584-0121

December 11, 1987  
**DER**  
DEC 15 1987  
**BAQM**

Mr. Clair H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Completeness Review of the Applications to Modify Construction Permits for the #4 Lime Kiln and Causticizing System

Dear Mr. Fancy:

This letter provides confirmation of our 12/9/87 meeting, during which we resolved the questions that were included in your 10/13/87 incompleteness letter regarding the above referenced subject. We would first like to express our appreciation for this time you provided us with during our recent meeting. Your participation was crucial to the successful resolution of all the issues.

The major discussion item during the meeting was the approval of the requested increase in maximum allowable slaker system process rate. As we agreed, the requested rate is appropriate and the construction permit will be modified accordingly. To address the Department's concern regarding the management of on-going incremental rate increases in a complex facility, it was also agreed to retain the existing maximum allowable rate in terms of an annualized maximum. We applaud this unique solution which provides the necessary environmental protection and provides us with the needed operational flexibility. This approach could provide similar solutions in other areas.

As we also agreed, the other minor permit modification requests will be incorporated into the forthcoming public notice preliminary drafts.

As you are aware, the existing construction permit expires at the end of January. As a result, we would appreciate the timely completion of the remaining construction permit modification process. If the need arises, however, we could initiate another expiration extension request to provide you with the needed time.

Again, thank you for your continued commitment to the identification of sound and realistic solutions to environmental issues. If we can provide any further assistance, please do not hesitate to call on us.

Copied: CHF/IBT  
Bruce Mitchell } 12/17/87

THE BUCKEYE CELLULOSE CORPORATION  
a Procter & Gamble Company

Ray Andreu  
Plant Environmental Manager

RA:msw  
3073L

DER

DEC 09 1987

BAQM

SLAKER CONSTRUCTION PERMIT MODIFICATION

<u>Slaker Input</u>	<u>Construction Permit Application</u> (lb/hr dry)	<u>Construction*</u> <u>Permit Modification</u> (lb/hr dry)	<u>Difference</u>
Lime	56,430	59,240	
Green Liquor	<u>160,153</u>	<u>177,000</u>	
Total	216,583	236,240	+ 9.1%

\* This is the rate at which the compliance tests were run. Compliance tests were 10% of permitted allowable.

JEF:msw  
3068L  
12/8/87

COMPARISON OF ACTUAL VERSUS ALLOWABLE EMISSIONS

<u>Source</u>	<u>Parameter</u>	<u>Emissions</u>	
		<u>Verification Results</u>	<u>Permitted Allowable</u>
Lime Kiln	Particulate (Natural Gas) (#6 Fuel Oil)	2.0 lbs/hr	44.7 lbs/hr
		12.7 lbs/hr	56.2 lbs/hr
	Visible Emissions	0%	20%
Lime Slaker	Particulate	0.23 lbs/hr	2.08 lbs/hr
	Visible Emissions	0%	20%
Water Treatment Lime Silos Baghouse	Visible Emissions	0%	< 5%
Causticizing Lime Silos Baghouse	Visible Emissions	0%	< 5%

Bruce DER<sup>12/15</sup>  
 I am glad this  
 100% G20 by 1987  
 resolved.  
 BAQM

P 274 007 667

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1985-480-794

Sent to <b>John L. Sipple, Plt. Mgr</b> <b>The Buckeye Cellulose Corp.</b>	
Street and No. <b>Route 3, Box 260</b>	
P.O., State and ZIP Code <b>Perry, FL 32347</b>	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date <b>Mailed: 10/13/87</b> <b>Permit: AC 62-140034</b>	

PS Form 3800, June 1985

PS Form 3811, July 1983 447-845

**SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to: **John L. Sipple**  
**The Buckeye Cellulose Corporation**  
**Route 3, Box 260**  
**Perry, FL 32347**

4. Type of Service: Article # **101**

<input type="checkbox"/> Registered	<input type="checkbox"/> Insured
<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD
<input type="checkbox"/> Express Mail	

P 274 007 667

**Always obtain signature of addressee or agent and DATE DELIVERED.**

- Signature - Addressee  
X
- Signature - Agent  
X *Ticker L. Beach*
- Date of Delivery  
*10-15-87*
- Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

file

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

October 13, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John L. Sipple  
Plant Manager  
The Buckeye Cellulose Corporation  
Route 3, Box 260  
Perry, Florida 32347

Dear Mr. Sipple:

Re: Completeness Review of the Application to Modify  
Air Pollution Sources, No. AC 62-140034

The Department received your cover letter and the above referenced application dated September 11, 1987, on September 14, 1987. Based on a review of the data, the application package is deemed incomplete. The following information, including all calculations, reference material and assumptions, shall be submitted to the DER's Bureau of Air Quality Management before the status can, again, be ascertained. If there are any responses that you feel are proprietary, please designate so and submit the material as a separate document and the Department will maintain confidentiality.

1. Was the pump(s) for the transport of green liquor to the slaker system replaced as part of the causticizing project just completed? If so, please describe each replacement and include the previous maximum pump capacity(ies).
2. What has been the level of the actual pumping rate of the transport of green liquor solids to the previous existing slaker system for the last five years and submit supporting data?
3. Provide a mill-wide material and chemical balance with the green liquor solids utilization rate of 160,153 lbs/hr. Provide the same analysis at 177,000 lbs/hr. For both rates, calculate the pollutant emission changes for each affected source (for existing sources, calculate actual pollutant emission changes and provide the last two years of data for justification; for sources that have had a construction permit, calculate any pollutant changes in the allowable

Mr. John L. Sipple  
Page Two  
October 13, 1987

emissions) at 8760 hrs/yr, unless restricted by any federally enforceable permit condition.

4. Provide an inventory of all storage bins and tanks associated with the waste water treatment system and causticizing system to include their maximum storage capacities, incoming flow and discharge flow potential per pipe, the source(s) each incoming and discharge pipe is connected to, and an inventory of all pumps and their maximum pumping capacities per material handled associated with each storage bin and tank. Are any of the storage bins or tanks used for storage of more than one type of material? If so, please provide a detailed description.
5. Are there in-line flow meters associated with every pump and the incoming and discharge pipes to every storage tank and bin? If not, which ones currently do not have one? Are the valves computer or manually operated?
6. In your schematic of the proposed system, describe in detail the stream labeled "22 - To Process". Provide a detailed schematic as part of the description.
7. Provide a material and chemical balance of the waste water treatment system utilizing both 44 tons per hour and 51 tons per hour of purchased lime plus lime kiln product.
8. For the waste water treatment system, provide a detailed schematic of the incoming and returning pipes for the untreated and treated water, including their maximum flow rates, their origin(s), and the source(s) for which it will be discharged into after treatment.
9. Does the mill market white liquor?
10. Since the slaking system is in balance with the capacity of the lime kiln and was confirmed so in the original project application meeting of August 6, 1985, describe in detail, using a material and chemical balance, the mill-wide processes while utilizing both 27.08 and 71.08 tons per hour of CaO in the slaking system.
11. Since the lime kiln's maximum production rate of CaO is 27.08 tons per hour, how is it possible to process an equivalent of approximately 71 or more tons per hour CaO?



Mr. John L. Sipple  
Page Three  
October 13, 1987

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

Sincerely,

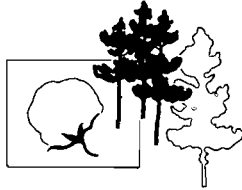
A handwritten signature in black ink, appearing to read "C. H. Fancy". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/BM/s

cc: W. Stewart  
R. Andreu  
M. Zilberberg  
B. Pittman

First in cellulose



# The Buckeye Cellulose Corporation

Mailing Address: Route 3 Box 260 Perry, Florida 32347 Phone: (904) 584-0121

September 11, 1987

Mr. Clair H. Fancy, Deputy Bureau Chief  
Bureau of Air Quality Management  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 31399-2400

Re: Construction Permit Modification Request for  
Permit Numbers AC62-107857 and AC62-107858

Dear Mr. Fancy:

Enclosed are four (4) copies each of two (2) applications to modify construction permit numbers AC62-107857 and AC62-107858, including the necessary attachments. Also enclosed is a check for \$1,000 to cover the fee for filing.

As you know, the new causticizing modernization project replaces our old causticizing system, which included four calcining units and an obsolete causticizing system. As we have confirmed via our compliance verification testing, the major environmental benefits originally envisioned from this project are being more than realized. These outstanding results are summarized in Attachment "I".

Basically, the changes are being requested to reflect actual construction details and realized capability. The requested revisions are minor in nature and do not have significant environmental impact.

Mr. Bruce Mitchell has identified two clarification items, based on the original modification request inquiry package dated 7/21/87. Our explanation of these items are as follows:

1. Slaker Rate Increase

We have requested a small increase in allowable slaking rate (less than 10% increase in rate vs. original application) to reflect the actual peak rate performance capability. This additional capability is a result of the normal variability of "real life" conditions versus good engineering practice design calculations for the green liquor feed pumps. The requested increase is still well within the design capability of the slakers' system and their air emissions control device. This was verified during the compliance verification process. In fact, the design for the two Model No. 18 slakers and control device utilized in this project could accommodate rates well in excess of the installed green liquor flow capability.

In addition, the requested slaker rate actually represents approximately 95% of our previous slaking capability. As a result, the total mass balance concern regarding the other pulping systems is not relevant.

We would like to assure you that our present slaker operation is consistent with the requirements and limitations contained in the original construction permit.

The higher slaker rate being requested is attractive to us in terms of system maintainability. The additional capability will enhance our liquor inventory recovery capability following extended causticizing system downtime periods.

9/14/87

CHF

~~CHF~~

Thanks

☺

12010

1987 SEP 15 AM 10:31  
RECEIVED  
DER-MAIL ROOM

2. Water Treatment Lime Storage Bins Baghouse Replacement

Contrary to our original concept, which utilized the old, existing baghouse, the water treatment lime storage bins baghouse was replaced during the project construction phase. This replacement was undertaken as a means of complying with the "no visible emissions" provision contained in the permit. In our later estimation, the old baghouse could not have satisfied the new visibility requirements.

The new baghouse system did not alter process weight rate, but did require a change in blower capacity (CFM) to reflect actual piping layout. On paper, as a result, under worst case assumptions this could result in a 0.94 TPY increase in particulate emissions. This insignificant increase, however, does not alter the overall PSD inapplicability permitting approach. Particulate matter still remains below the 25 TPY significance level.

As requested, a manufacturers performance warranty for the installed system is attached (See Attachment II).

In addition to the specific modification requests contained in this package, we would like to correct the typographical error contained in page 8 of 9 of the original construction permit (No. AC62-107857). The allowable slaker PM emissions should be 2.08 lbs/hr versus the 2.03 lbs/hr shown.

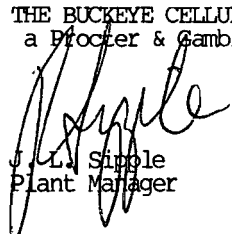
We have also enclosed a copy of the initial modification request inquiry package, including additions requested by Mr. Mitchell. This details the specific changes being requested.

We believe that this information is adequate to finalize the requested construction permit modifications. We are anxious to complete the remaining details on what must be considered a significant environmentally beneficial endeavor.

Should there be any additional questions, please contact Mr. Ray Andreu (Plant Environmental Manager) at (904) 584-0347.

Very truly yours,

THE BUCKEYE CELLULOSE CORPORATION  
a Procter & Gamble Company



J. L. Siple  
Plant Manager

JLS/RA:msw  
3977T  
Attachments

cc: Mr. Bruce Mitchell  
Bureau of Air Quality Management  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Mr. William P. Stewart  
Air Section Supervisor  
Northeast District  
Florida Department of  
Environmental Regulation  
3426 Bills Road  
Jacksonville, FL 32207

COMPARISON OF ACTUAL VERSUS ALLOWABLE EMISSIONS

<u>Source</u>	<u>Parameter</u>	<u>Emissions</u>	
		<u>Verification Results</u>	<u>Permitted Allowable</u>
Lime Kiln	Particulate (Natural Gas) (#6 Fuel Oil)	2.0 lbs/hr	44.7 lbs/hr
		12.7 lbs/hr	56.2 lbs/hr
	Visible Emissions	0%	20%
Lime Slaker	Particulate	0.23 lbs/hr	2.08 lbs/hr
	Visible Emissions	0%	20%
Water Treatment Lime Silos Baghouse	Visible Emissions	0%	< 5%
Causticizing Lime Silos Baghouse	Visible Emissions	0%	< 5%



# FULLER COMPANY

ATTACHMENT II

2040 AVENUE "C"  
P.O. BOX 2040, BETHLEHEM, PENNSYLVANIA 18001, U.S.A.  
TWX: 510-651-5818 TELEX: 084-7443 CABLE COLFULLER

Buckeye Cellulose  
Fuller Contract #86-20180

PERFORMANCE WARRANTY  
(Particulate Emission)

Filter Receiver Model No. 36FR8

In addition to our standard Warranty as it appears under Terms and Conditions of the proposal, Fuller Company warrants the Fuller Fabric Filter will comply with .02 grs/ACF regarding solid particulate emission, excluding condensibles, provided it is stored, installed, operated and maintained in conformance with Fuller's instructions and the materials to be collected and operating conditions remain as specified by the Purchaser at the time of purchase.

Within ninety (90) days after start-up of the collector, Purchaser may at its expense, have conducted by an independent qualified company or governmental agency a test to determine whether the collector emissions are less than the specified collector emission maximum. If, through no fault of Fuller, the undertaking of such test is delayed for more than ninety (90) days after start-up or six (6) months from shipment, whichever occurs first, the emissions warranty shall be deemed fulfilled, and Fuller shall have no further obligation therewith. If, during such test, the emissions warranty is attained, it shall be deemed that Fuller has met the emissions warranty, and Fuller shall have no further obligation in connection therewith.

If the results of such test show the collector emissions exceed the specified maximum, the Purchaser will promptly notify Fuller in writing the results of such test. Thereafter, Fuller will be given a reasonable opportunity to perform its own tests. During the tests performed by Fuller, the Purchaser shall make available, free of charge, to Fuller qualified personnel to properly operate the fabric filter. The Purchaser shall also furnish all such utilities, materials, and equipment required to perform such test at no charge to Fuller.



## FULLER COMPANY

2040 AVENUE "C"  
P.O. BOX 2040, BETHLEHEM, PENNSYLVANIA 18001, U.S.A.  
TWX: 510-651-5818 TELEX: 084-7443 CABLE COLFULLER

Should the Fuller-conducted test substantiate that the maximum emissions are exceeded, Fuller shall make such modifications and adjustments as it deems appropriate to correct the emission non-compliance including the supplying of such additional equipment as Fuller deems appropriate up to a maximum of 10% of the F.O.B. Shipping Point sales price of the fabric filter originally supplied, inlet flange to outlet flange. Installation of such additional equipment will be by Purchaser.

Fuller's liability for failure to meet the guaranteed performance shall in no event exceed 10% of the F.O.B. shipping point sales price of the fabric filter originally supplied, inlet flange to outlet flange, which 10% shall include expenses incurred by Fuller for collector emission tests performed by Fuller and all materials and equipment supplied by Fuller for the purpose of achieving the emissions requirements.

This Performance Warranty is subject to the section titled LIABILITY of Fuller's Proposal Form FC-529.

Fuller's responsibility shall in no case exceed the liabilities stated in this guarantee. Buyer's remedy or remedies against Fuller and/or Fuller's liability relating to the performance of the warranties hereunder shall be solely and exclusively limited to those as provided herein.

EXCEPT AS STATED IN THIS PERFORMANCE (EMISSIONS) WARRANTY AND EXCEPT AS TO TITLE, THERE ARE NO GUARANTEES OR WARRANTIES OF MERCHANTABILITY, FITNESS, PERFORMANCE OR OTHERWISE, EXPRESS, IMPLIED OR STATUTORY, AND FULLER SHALL HAVE NO LIABILITY FOR CONSEQUENTIAL, INCIDENTAL OR OTHER DAMAGES, HOWSOEVER CAUSED.

  
\_\_\_\_\_  
ROBERT B. MOYER

August 24, 1987  
DATE

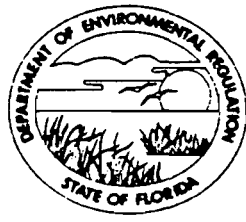
No change?  
AC 62-143536

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

DER  
SEP 14 1987  
BAQM

BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY  
G. DOUG DUTTON  
DISTRICT MANAGER

NORTHEAST DISTRICT  
3428 BILLS ROAD  
JACKSONVILLE, FLORIDA 32207



AC 62-107857  
109858

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Lime Kiln  New<sup>1</sup>  Existing<sup>1</sup>  
APPLICATION TYPE:  Construction  Operation  Modification  
COMPANY NAME: The Buckeye Cellulose Corporation 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) No. 4 Lime Kiln with ESP\*

SOURCE LOCATION: Street 5 to 6 miles S.E. of Perry City Taylor  
UTM: East 256,740 North 3328.700  
Latitude 30° 03' 59" N Longitude 83° 33' 12" W

APPLICANT NAME AND TITLE: Mr. John L. Sipple, 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 Buckeye Cellulose Corp.

I certify that the statements made in this application for a construction/modification 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.

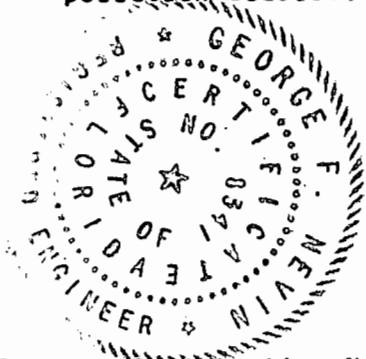
\*Attach letter of authorization Signed: *John L. Sipple*  
John L. Sipple, Plant Manager  
Name and Title (Please Type)  
Date: 8/11/87 Telephone No. (904) 584-0121

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 George F. Nevin

George F. Nevin  
Name (Please Type)

Watkins Engineers and Constructors  
Company Name (Please Type)

P.O. Box 2194; Tallahassee, FL 32316  
Mailing Address (Please Type)

Florida Registration No. 8341 Date: 9/10/87 Telephone No. (904) 576-7181

**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.

The essence of this project is the replacement of four existing lime combustion units with one large kiln for greater fuel efficiency--appreciably less BTU/ton of lime product. This project results in a dramatic reduction in most criteria pollutants. See Attachment A for details.

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

Start of Construction October 1985 Completion of Construction October 1987

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.)

Electrostatic Precipitator:	\$1,640,000	*Causticizing Lime Bin Baghouse:	\$50,000
Continuous Emission Monitors:	\$150,000	*Slakers Scrubber:	\$75,000
Precoat Filter Size Increase:	\$110,000	Total:	\$2,040,000
I.D. Fan Increase:	\$15,000		

\*From companion permit.

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

Not Applicable



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

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?  | <u>No</u>  |
| a. If yes, has "offset" been applied?   | <u>--</u>  |
| b. If yes, has "Lowest Achievable Emission Rate" been applied?  | <u>--</u>  |
| c. If yes, list non-attainment pollutants. _____  | <u>--</u>  |
| 2. Does best available control technology (BACT) apply to this source?<br>If yes, see Section VI.                                       | <u>No</u>  |
| 3. Does the State "Prevention of Significant Deterioration" (PSD)<br>requirement apply to this source? If yes, see Sections VI and VII. | <u>No</u>  |
| 4. Do "Standards of Performance for New Stationary Sources" (NSPS)<br>apply to this source?   | <u>Yes</u> |
| 5. Do "National Emission Standards for Hazardous Air Pollutants"<br>(NESHAP) apply to this source?                                      | <u>No</u>  |
| H. Do "Reasonably Available Control Technology" (RACT) requirements apply<br>to this source?  | <u>No</u>  |
| a. If yes, for what pollutants? _____   | <u>--</u>  |
| b. If yes, in addition to the information required in this form,<br>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.

See Attachment A for Items F. 3. and F. 4.

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Line Mud (dry)	Particulate	100%	96,726	Stream 11a
			(Bone dry feed)	

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

- Total Process Input Rate (lbs/hr): 103,872 Bone Dry Feed (Stream 12)
- Product Weight (lbs/hr): 54,167 lime product, dry basis (Stream 14 a and 14b)

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

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/hr	T/yr	
Particulates	56.20	246.16	* See below.	Gas/Oil 44.7/56.2 <sup>+</sup>	7,146	31,299	13b
Sulfur Dioxide	20.1	85.4	N/A	N/A	20.1	85.4	13b
Nitrogen Oxides	198.0	416.3	N/A	N/A	198.0	416.3	13b
Carbon Monoxide	81.3	355.9	N/A	N/A	81.3	355.9	13b
Vol.Org.Compds	9.5	41.5	N/A	N/A	9.5	41.5	13b

<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).

\*NSPS, 40 CFR 60, Subpart BB: Gas firing--0.067 gr/dscf, corrected to 10 percent oxygen.

+This allowable level for oil firing is more restrictive than NSPS.

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

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

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): \_\_\_\_\_

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

Name of Contaminant	Emission <sup>1</sup>		Allowed 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/hr	T/yr	
Tot. Red.Sulfur	3.28	14.37	**See Below	3.28	53.5	227.7	13b

<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).

\*\*NSPS, 40 CFR 60, Subpart BB: 8 ppm by volume, dry basis, corrected to 10 percent oxygen.



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

Stack Heights: 100 to 125 ft. Stack Diameter: 6.5 to 8.5 ft.  
 Gas Flow Rates: 108,000/ ACFM 45,020/ DSCFM Gas Exit Temperature: 290-430 °F.  
Gas/Oil Gas/Oil  
100,000 30-40 41,685  
 Water Vapor Content: 30-40 % Velocity: 29 to 54 FPS

\*Final stack design will be provided after vendor selection and prior to construction of the stack.

**SECTION IV: INCINERATOR INFORMATION**  
 Not Applicable

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 devices:  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 Attachment E.
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 B for emission estimates and Attachment A for compliance methods.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).  
See Attachment B.
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.)  
See Attachment F.
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).  
See Attachment F.
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 Attachment A.
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 roadway (Example: Copy of relevant portion of USGS topographic map).  
See Attachment A.
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.  
See Attachment A.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation. (Check attached)
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. Not Applicable.

**SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY**  
Not Applicable

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

- 5. Useful Lives
- 7. Energy:
- 9. Emissions:

- 6. Operating Costs:
- 8. Maintenance Costs:

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Heights: ft.
- b. Diameter: ft.
- c. Flow Rate: ACFM
- d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- 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:

2.

- 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:

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

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



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:

e. (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 Rates:<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 Rates:<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 Not Applicable**

**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).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?  
[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. \_\_\_\_\_ Year(s) of data from \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_ to \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
month day year month day year

2. Surface data obtained from (location) \_\_\_\_\_

3. Upper air (mixing height) data obtained from (location) \_\_\_\_\_

4. Stability wind rose (STAR) data obtained from (location) \_\_\_\_\_

C. Computer Models Used

1. \_\_\_\_\_ Modified? If yes, attach description.

2. \_\_\_\_\_ Modified? If yes, attach description.

3. \_\_\_\_\_ Modified? If yes, attach description.

4. \_\_\_\_\_ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO <sub>2</sub>	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

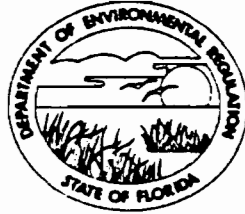
G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

BEST AVAILABLE COPY  
STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

water Treatment lime Storage Bins (By bou  
AC 62-140034  
#1000.00 (mail room  
9-15-87  
BAQM (9-14-87  
Receipt # 76182

NORTHEAST DISTRICT  
3426 BILLS ROAD  
JACKSONVILLE, FLORIDA 32207



DER  
SEP 14 1987  
BAQM

BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY  
G. OUG DUTTON  
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES  
Causticizing System and

SOURCE TYPE: Lime Handling [X] New<sup>1</sup> [ ] Existing<sup>1</sup>

APPLICATION TYPE: [X] Construction [ ] Operation [X] Modification

COMPANY NAME: The Buckeye Cellulose Corporation 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) Lime Bins, Slakers, White Liquor and Lime Mud  
Pressure Filters and

SOURCE LOCATION: Street 5 to 6 miles S.E. of Perry Fugitives\*  
City Perry

UTM: East 256,740 North 3328.700

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

APPLICANT NAME AND TITLE: Mr. John L. Sipple, 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 Buckeye Cellulose Corp

I certify that the statements made in this application for a construction/modification  
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

Signed: [Signature]  
John L. Sipple, Plant Manager  
Name and Title (Please Type)

Date: 8/11/87 Telephone No. (904) 584-0121

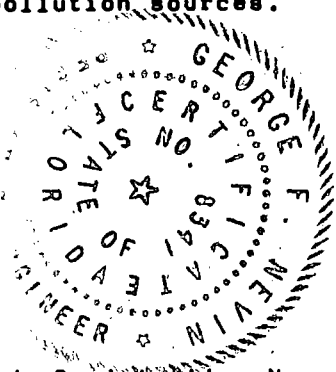
B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

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)

\*This permit covers ancillary equipment and is a companion permit application  
to the No. 4 Lime Kiln application.

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 George F. Nevin

George F. Nevin

Name (Please Type)

Watkins Engineers and Constructors

Company Name (Please Type)

P.O. Box 2194; Tallahassee, FL 32316

Mailing Address (Please Type)

Florida Registration No. 8341 Date: 9/10/87 Telephone No. (904) 576-7181

**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 No. 4 Lime Kiln application, Attachment A.

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

Start of Construction October 1985 Completion of Construction October 1987

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.)

See No. 4 Lime Kiln application.

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

Not Applicable.

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

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? ---  
b. If yes, has "Lowest Achievable Emission Rate" been applied? ---  
c. If yes, list non-attainment pollutants. ---

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? \_\_\_\_\_

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:**

Description (dry)	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Green Liquor Solid	Particulate	100%	177,000 #	1a plus 1b
Lime Product	Particulate	100%	59,240 #	3a plus 3b
Water Treatment Lime Mud	Particulate	100%	9,673	25
Kiln Lime Product	Particulate	100%	54,167	14a plus 14b
Purchased Lime Product	Particulate	100%	44,000 #	15a plus 15b

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

1. Total Process Input Rate (lbs/hr): See Attachment A
2. Product Weight (lbs/hr): See page 4b of 12

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

Name of Contaminant	Emission <sup>1</sup>		Allowed 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	
Particulate	2.08	9.13	Process Wt. Table*	36.6	20.8	91.2	2
TRS as H <sub>2</sub> S	2.27	0.081	NA	NA	2.27	0.081	7
TRS as H <sub>2</sub> S	2.27	0.066	NA	NA	2.27	0.066	9
Particulate	0.343	1.50	Process Wt. Table*	27.8-34.2	343	1502	16
Particulate	0.103	0.451	Process Wt. Table*	24.4	103	451	20

<sup>1</sup>See Section V, Item 2. \*E = 17.31 P<sup>0.16</sup> for P ≥ 30 TPH

E = 3.59 P<sup>0.62</sup> for P ≤ 30 TPH

<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).

# - Revised 7/16/87

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Lime Product:				
- Purchased	Particulate	100	44,000 #	19
- Kiln Product	Particulate	100	14,000 #	18

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

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

2. Product Weight (lbs/hr): \_\_\_\_\_

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

Name of Contaminant	Emission <sup>1</sup>		Allowed 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).

# - Revised 7/16/87



PRODUCT RATES

<u>DESCRIPTIONS</u>	<u>PRODUCT (lb/hr dry)</u>	<u>RELATE TO FLOW DIAGRAM</u>
White Liquor	113,150	26
Lime Mud to Kiln	96,726	11a
Lime Product to Water Treat.	5,417 Average	22
Lime Product to Slakers	56,430	3a plus 3b
Lime Product	44,000	18

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Micro-Pulsair 100S-10TR				
Equip. #08-1109 #	Particulate	99.9%	Submicron	See Att.B-2
Fuller Co. 36FR8				
Equip. #07-161 #	Particulate	99.9%	Submicron	See Att. B-2
Enso Slakers Scrubber 2XØ600/800 #				
Equip. #08-1022 #	Particulate	90%+	10 $\mu$ +	See Att.B-4

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 NA Maximum \_\_\_\_\_

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

All collected lime dust will be recycled back into lime bins.

Grits from the two slakers (Streams 5a and 5b) and dregs and CaCO<sub>3</sub> from dregs filter (Stream 24) go to onsite solid waste disposal or process sewer. All liquid wastes are either recycled or go to NPDES treatment system.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):  
See Attachment B-1.

Stack Heights: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ ft.  
 Gas Flow Rates: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM Gas Exit Temperatures: \_\_\_\_\_ °F.  
 Water Vapor Content: \_\_\_\_\_ % Velocity: \_\_\_\_\_ FPS

**SECTION IV: INCINERATOR INFORMATION**  
Not Applicable

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 Rates: \_\_\_\_\_ 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 devices:  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 Attachment A
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 A
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).  
See Attachment A
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.)  
See Attachment B
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 x potential (1-efficiency).  
See Attachment B
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 No. 4 Lime Kiln Application, Attachment A
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 No. 4 Lime Kiln Application, Attachment A
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.  
See No. 4 Lime Kiln Application, Attachment A

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation. Check attached.
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. Not Applicable.

**SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY Not Applicable**

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

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

Contaminant	Rate or Concentration

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

Contaminant

Rate or Concentration

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

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Costs:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height:

ft.

b. Diameter:

ft.

c. Flow Rate:

ACFM

d. Temperature:

°F.

e. Velocity:

FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

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:

2.

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:

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

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

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**

Not Applicable

**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).



2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. \_\_\_\_ Year(s) of data from \_\_\_\_/\_\_\_\_/\_\_\_\_ to \_\_\_\_/\_\_\_\_/\_\_\_\_  
month day year month day year

2. Surface data obtained from (location) \_\_\_\_\_

3. Upper air (mixing height) data obtained from (location) \_\_\_\_\_

4. Stability wind rose (STAR) data obtained from (location) \_\_\_\_\_

C. Computer Models Used

1. \_\_\_\_\_ Modified? If yes, attach description.

2. \_\_\_\_\_ Modified? If yes, attach description.

3. \_\_\_\_\_ Modified? If yes, attach description.

4. \_\_\_\_\_ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO <sup>2</sup>	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

P 274 007 709

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

★ U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Sent to <b>Mr. John Sipple</b> <b>Buckeye Cellulose Corp.</b>	
Street and No. <b>Route 3, Box 260</b>	
P.O., State and ZIP Code <b>Perry, FL 32347</b>	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date <b>Mailed: 08/27/87</b>	
Permit Nos.: <b>AC 62-107857</b> <b>AC 62-107858</b>	

PS Form 3811, July 1983 447-845

● **SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:  
**Mr. John Sipple, Plant Manager**  
**The Buckeye Cellulose Corp.**  
**Route 3, Box 260**  
**Perry, FL 32347**

4. Type of Service: <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured <input type="checkbox"/> COD	Article Number <b>P 274 007 709</b>
--	--	--

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee  
X

6. Signature - Agent  
X *Madeline Collins*

7. Date of Delivery  
*8/28/87*

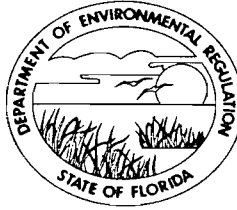
8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

Jiu

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

August 26, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Sipple  
Plant Manager  
The Buckeye Cellulose Corporation  
Route 3, Box 260  
Perry, Florida 32347

Dear Mr. Sipple:

Re: Request for Modifications to Construction Permits  
Nos. AC 62-107857 and -107858

The Department's Bureau of Air Quality Management (BAQM) has received the above request along with Mr. Ray Andreu's cover letter dated July 21, 1987. Also, the Department's Northeast District has received a request for operation permits, which incorporates the above referenced request in them, and associated processing fees (received on July 30, 1987). Based on a meeting and phone calls with Mr. Andreu and Mr. Bruce Mitchell of my staff, the following issues were discussed and clarified:

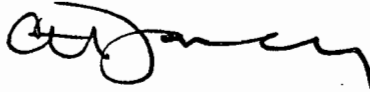
- 1) Since the request would constitute modifications to the above referenced construction permits, the construction permits, which contain federally enforceable conditions, cannot be amended without a complete permitting review process. Therefore, the mill will have to submit complete application packages with the appropriate processing fees to the Department's BAQM for any modifications to these sources.
- 2) The Department's Districts are not privileged to issue any operation permit that does not reflect the conditions established through a federally enforceable construction permit. Therefore, it is recommended that the mill submit amended operation permit requests to the Department's Northeast District and request that the permitted conditions be the same as what is contained in the above referenced construction permits. This process will also prevent the loss of any fee previously submitted for processing.

Mr. John Sipple  
Page 2  
August 26, 1987

- 3) Since the expiration date for the above referenced construction permits is October 31, 1987, the Department's Northeast District will not have the minimum 90-day processing clock in which to review and process your operation permit amendment requests. Therefore, it is recommended that the mill submit expiration date extension requests to the Department's BAQM in order to provide the Department's Northeast District with adequate operation permit application review and processing time.

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

Sincerely,



C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/BM/s

cc: R. Andreu - Buckeye  
B. Stewart - Tax Dist. Office  
B. Pittman - DER-OGC  
J. Wood - Buckeye (Memphis, Tenn) 8-27-87 RBM

First in cellulose



# The Buckeye Cellulose Corporation

A Procter and Gamble Company

Mailing Address: Route 3 Box 260 Perry, Florida 32347 Phone: (904) 584-0121

July 21, 1987

Mr. Clair H. Fancy, Deputy Bureau Chief  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

DER  
JUL 22 1987  
BAQM

Re: Request for Modifications to Causticizing Modernization Project  
Permit Nos. AC62-1007857 and AC62-1007858

Since the EPA recognizes construction permits as the only federally enforceable documents, our objective is to insure that our construction permits are as accurate as possible. As a result, we are requesting some modifications to the two permits referenced above, to reflect actual, "as built" information.

The changes being requested are non-substantive in nature and have been reviewed with Mr. Bruce Mitchell. In fact, Mr. Mitchell was informed of all changes throughout the construction process.

In order to facilitate your review process, we have modified and enclosed each page in the construction permit package, in which a change is being requested. To help you identify the specific modifications, changes involving all support documents have been underlined. In the case where numerical changes were made in the various tables, these changes have been highlighted by using the symbol (#).

As we are currently in the process of applying for the operating permits, we would appreciate an expeditious reply. If you have any questions, please contact Mr. Jim Farmer of our Plant Environmental Group @ (904) 584-0333 or Ms. Julia Wood of our Divisional Environmental Group @ (901) 320-8458.

Thank you for consideration of this matter.

Very truly yours,

THE BUCKEYE CELLULOSE CORPORATION  
a Procter & Gamble Company

R. Andreu  
Environmental Control Manager

RA:msw  
2804L  
Attachments

cc: Mr. Bruce Mitchell (3)  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Mr. William P. Stewart  
Air Section Supervisor  
Northeast District  
Department of Environmental Regulation  
3426 Bills Road  
Tallahassee, FL 32207

7/22  
~~\_\_\_\_\_~~  
a copy. FYI. Bruce has  
Thanked,  
(2)

Changes to Buckeye Causticizing Modernization Permit

AC62-107857

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

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

Description (dry)	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Green Liquor Solid	Particulate	100%	177,000 #	1a plus 1b
Lime Product	Particulate	100%	59,240 #	3a plus 3b
Water Treatment Lime Mud	Particulate	100%	9,673	25
Kiln Lime Product	Particulate	100%	54,167	14a plus 14b
Purchased Lime Product	Particulate	100%	44,000 #	15a plus 15b

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

1. Total Process Input Rate (lbs/hr): See Attachment A
2. Product Weight (lbs/hr): See page 4b of 12

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

Name of Contaminant	Emission <sup>1</sup>		Allowed 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	
Particulate	2.08	9.13	Process Wt. Table*	36.6	20.8	91.2	2
TRS as H <sub>2</sub> S	2.27	0.081	NA	NA	2.27	0.081	7
TRS as H <sub>2</sub> S	2.27	0.066	NA	NA	2.27	0.066	9
Particulate	0.343	1.50	Process Wt. Table*	27.8-34.2	343	1502	16
Particulate	0.103	0.451	Process Wt. Table*	24.4	103	451	20

<sup>1</sup>See Section V, Item 2. \*E = 17.31 p<sup>0.16</sup> for P ≥ 30 TPH

E = 3.59 p<sup>0.62</sup> for P ≤ 30 TPH

<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).

# - Revised 7/16/87

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Lime Product:				
- Purchased	Particulate	100	22,000 #	19
- Kiln Product	Particulate	100	14,000 #	18

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

- Total Process Input Rate (lbs/hr): \_\_\_\_\_
- Product Weight (lbs/hr): \_\_\_\_\_

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

Name of Contaminant	Emission <sup>1</sup>		Allowed 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).

# - Revised 7/16/87



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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Micro-Pulsair 100S-10TR				
Equip. #08-1109 #	Particulate	99.9%	Submicron	See Att.B-2
Fuller Co. 36FR8				
Equip. #07-161 #	Particulate	99.9%	Submicron	See Att. B-2
Enso Slakers Scrubber 2XØ600/800 #				
Equip. #08-1022 #	Particulate	90%+	10 $\mu$ +	See Att.B-4

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 NA Maximum \_\_\_\_\_

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

All collected lime dust will be recycled back into lime bins.  
Grits from the two slakers (Streams 5a and 5b) and dregs and CaCO<sub>3</sub> from dregs filter (Stream 24) go to onsite solid waste disposal or process sewer#. All liquid wastes are either recycled or go to NPDES treatment system.

## I. NEW SLAKERS

A. PARTICULATE MATTER EMISSIONS

## 1. MAXIMUM EMISSIONS

Based on one slaker vendor's information, total particulate emissions from slaking would be 5.0 lb/day. Other vendors could vary from this level. Therefore, maximum emissions are calculated at ten times this level.

$$5.0 \text{ lb/day} \times 10 / 24 \text{ hr/day} = 2.08 \text{ lb/hr PM}$$

$$2.08 \text{ lb/hr} \times 8,760 \text{ hr/yr} / 2,000 \text{ lb/ton} = 9.13 \text{ TPY PM}$$

## 2. ALLOWABLE EMISSIONS

Based on process weight table,  $E = 17.31 P^{0.16}$  for P 30 TPH  
Input to slakers consists of green liquor (Stream 1) and lime (Stream 3).

$$\begin{aligned} \text{Maximum green liquor solids to slaking (Streams 1a plus 1b)} \\ = 177,000 \text{ lb/hr} = 88.5 \text{ TPH} \end{aligned}$$

$$\begin{aligned} \text{Maximum lime product to slaking (Streams 3a plus 3b)} \\ = 59,240 \text{ lb/hr} = 29.62 \text{ TPH} \end{aligned}$$

$$\text{Maximum total process input rate} = 118.12 \text{ TPH}$$

$$E = 17.31 (118.12)^{0.16} = 37.1 \text{ lb/hr PM}$$

## 3. POTENTIAL EMISSIONS

Scrubber on slakers rated at 90% or greater efficiency  
 $2.08 \text{ lb/hr} / 0.10 = 20.8 \text{ lb/hr} = 91.2 \text{ TPY PM}$

B. PRODUCT RATE

Slakers product rate = Lime mud + white liquor

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Assuming grits are negligible, the slaker product rate equals process input rate to slakers = 118.12 TPH = 236,240 lb/hr.

## II. LIME TRANSFER TO CAUSTICIZING LIME BINS

PARTICULATE MATTER

## 1. MAXIMUM EMISSIONS

One baghouse controls dust from both lime bins

Manufacturer's data: 0.02 gr/scf @ 2,000 scfm (see Attachment B-2)

$0.02 \text{ gr/scf} \times 2,000 \text{ scf/min} \times 60 \text{ min/hr} / 7,000 \text{ gr/lb}$

$= 0.343 \text{ lb/hr} = 1.50 \text{ TPY PM}$

## 2. ALLOWABLE EMISSIONS

Process weight table,  $E = 17.31 P^{0.16}$  for  $P \geq 30 \text{ TPH}$

$E = 3.59 P^{0.62}$  for  $P \leq 30 \text{ TPH}$

- a. Maximum process rate from No. 4 Lime Kiln into bins  
(Stream 14a + 14b) = 650 TPD

$= 27.083 \text{ TPH}$

$E = 3.59 (27.083)^{0.62} = 27.8 \text{ lb/hr PM}$

- b. Maximum process rate from trucks at 44 TPH (two unloading spots may operate at the same time at 22 TPH each) (total of Streams 15a and 15b).

$E = 17.31 (44)^{0.16} = 31.7 \text{ lb/hr PM}$

- c. The maximum process rate will occur when operating two truck unloading spots and simultaneously operating the kiln.

$E = 17.31 (27.083 + 44)^{0.16} = 34.2 \text{ lb/hr PM}$

3. POTENTIAL EMISSIONS (Before Control)

Baghouse rated at 99.9% efficiency

$0.343 \text{ lb/hr} / (1-0.999) = 343 \text{ lb/hr} = 1,502 \text{ TPY PM}$

III. LIME TRANSFER TO WATER TREATMENT BINS

PARTICULATE MATTER

1. MAXIMUM EMISSIONS

Baghouse rated at 1851 scfm and 0.02 gr/scf (see Attachment B-2)  
 $0.02 \text{ gr/scf} \times \underline{1851} \text{ scfm} \times 60 \text{ min/hr} / 7,000 \text{ gr/lb} = \underline{0.317} \text{ lb/hr}$

Assume baghouse operates at all times (worst case):  
 $\underline{0.317} \text{ lb/hr} \times 8,760 \text{ hr/yr} / 2,000 \text{ lb/ton} = \underline{1.388} \text{ TPY PM}$

2. ALLOWABLE EMISSIONS

Process weight table,  $E = 3.59 P^{0.62}$  for P 30 TPH

Maximum transfer rate = 22 TPH (Stream 19)

$E = 3.59 (22)^{0.62} = 24.4 \text{ lb/hr PM}$

3. POTENTIAL EMISSIONS

Assume 99.9% efficiency on baghouse

$\underline{0.317} \text{ lb/hr} / (1-0.999) = \underline{317} \text{ lb/hr} = \underline{1388} \text{ TPY PM}$

## V. WHITE LIQUOR PRESSURE FILTER

ESTIMATED TRS EMISSIONS

Total TRS emissions are considered to be insignificant but can be calculated as follows:

1. NORMAL OPERATION--Based on design engineering information supplied by project engineers:

1,400 acfm @ 210°F

H<sub>2</sub>S = 2 ppm

PV = mRT            m - PV/RT

R = 1,545 ft-lb<sub>f</sub>/lb mole-°R

MW H<sub>2</sub>S = 34

R = 45.4 ft-lb<sub>f</sub>/lb<sub>m</sub>-°R

$$m = \frac{(14.7 \times 144) \text{ lb}_f}{\text{ft}^2} \times \frac{1,400 \text{ ft}^3}{\text{min}} \times \frac{1 \text{ lb}_m \text{ } ^\circ\text{R}}{45.4 \text{ ft-lb}_f} \times \frac{1}{(210+460)^\circ\text{R}} \times$$

$$\frac{60 \text{ min}}{\text{hr}} \times \frac{2.0}{10^6} = 0.0117 \text{ lb/hr TRS as H}_2\text{S}$$

$$0.0117 \frac{\text{lb}}{\text{hr}} \times \frac{8,760 \text{ hr}}{\text{yr}} / \frac{2,000 \text{ lb}}{\text{ton}} = 0.051 \text{ TPY TRS as H}_2\text{S}$$

Actual vent installation incorporated a simple steam eductor to provide the vent draft instead of a fan. Therefore, actual exit volume and temperatures are higher; approximately 350°F (50 psig steam) and are saturated with moisture. No increase in TRS emissions is expected from the steam eductor.

2. ACID WASHING

TRS fugitive emissions occur during the first 2 to 5 minutes of the 8-hour acid wash cycle. Acid wash frequency may be as frequent as once every two weeks. Based on 2 ft<sup>3</sup> of white liquor residing in a drained filter before acid washing:

Total TRS as H<sub>2</sub>S = 0.0026 + 0.0057 = 0.0083 lb/hr

0.0083 lb/hr x 8,760 hr/yr / 2,000 lb/ton = 0.036 TPY TRS as H<sub>2</sub>S

Actual vent installation incorporated a simple steam eductor to provide the vent draft instead of a fan. Therefore actual exit volume and temperatures are higher; approximately 350°F (50 psig steam) and are saturated with moisture. No increase in TRS emissions is expected from the steam eductor.

## 2. ACID WASHING

Frequency of acid washing of lime mud pressure filter will be the same as for the white liquor pressure filter (i.e., once every 2 weeks). The basis of emissions is also the same as for the white liquor pressure filter (i.e., 2 ft<sup>3</sup> of white liquor in filter).

TRS emissions = 0.030 TPY TRS as H<sub>2</sub>S

## 3. TOTAL TRS

0.036 + 0.030 = 0.066 TPY TRS as H<sub>2</sub>S

## VII. LIME MUD PRECOAT FILTERS

## 1. NORMAL OPERATIONS

Based on field tests, Eurocan Pulp and Paper in Kitimat B.C., Canada, has developed fugitive TRS emission estimates for precoat filters. For a 900 gpm white liquor production at 31 percent sulfidity, estimated TRS emissions are 9 lb/day. It is reasonable to assume emissions are directly related to sulfidity and throughput.

Therefore, for the new precoat filters operating at an average of 1,200 gpm white liquor with 27 percent sulfidity, calculated TRS emissions are:

$$a. \frac{27}{31} = \frac{x}{9} \quad x = 7.8 \text{ lb/day at } 27\% \text{ sulfidity}$$

then:

$$\frac{1,200}{900} = \frac{x}{7.8} \quad x = 10.4 \text{ lb/day at } 1,200 \text{ gpm and } 27\% \text{ sulfidity}$$

$$b. 10.4 \text{ lb/day} / 24 \text{ hr/day} = 0.433 \text{ lb/hr TRS as H}_2\text{S}$$

$$c. 10.4 \text{ lb/day} \times \frac{365 \text{ day}}{\text{yr}} / \frac{2,000 \text{ lb}}{\text{ton}} = 1.90 \text{ TPY TRS as H}_2\text{S}$$

The precoat filters selected have hoods with a natural draft moisture vent. The units are in an enclosed building to minimize fugitive dust emissions from dewatered lime mud conveyors. Hood vents exit the building to prevent moisture from the filter hot water sprays from condensing in the building.

## 2. ACID WASHING

The frequency of acid washing each precoat filter could be as great as twice per week. Because of the method of acid washing, it is expected that total volume of residual white liquor per wash will be about 25 percent of the white liquor pressure filter or  $0.25 \times 2 \text{ ft}^3 = 0.5 \text{ ft}^3$ .



## VIII. DREGS FILTERS

FUGITIVE TRS EMISSIONS

## 1. NORMAL OPERATION

The information from Eurocan Pulp and Paper includes an estimate for dregs filter fugitive TRS emissions at 75 percent of the lime mud precoat filter emissions. Calculated emissions then are:

$$0.75 \times 10.4 \text{ lb/day} = 7.80 \text{ lb/day}$$

$$7.80 / 24 \text{ hr/day} = 0.325 \text{ lb/hr TRS as H}_2\text{S}$$

$$7.80 \text{ lb/day} \times \frac{365 \text{ days/year}}{2,000 \text{ lb/ton}} = 1.424 \text{ TPY TRS as H}_2\text{S}$$

## 2. ACID WASHING

The dregs filter could be acid washed up to twice per month. Emissions are calculated based on 75 percent of the emissions from the white liquor pressure filters. Calculated emissions are:

$$0.75 \times 2.27 \text{ lb H}_2\text{S/wash} = \frac{1.70 \text{ lb}}{\text{wash}}$$

$$\frac{1.70 \text{ lb}}{\text{wash}} \times \frac{1 \text{ filter}}{\text{filter-month}} \times \frac{2 \text{ wash}}{\text{filter-month}} \times \frac{12 \text{ month}}{\text{year}} / 2,000 \text{ lb/ton}$$

$$= 0.020 \text{ TPY TRS as H}_2\text{S}$$

## C. TOTAL

$$1.424 + 0.020 = 1.34 \text{ TPY TRS as H}_2\text{S}$$

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Table B-1. EMISSION STACK GEOMETRY AND FLOW CHARACTERISTICS

Emission Point	Stack <sup>2</sup> Height (ft)	Stack Diameter (in)	Gas Flow Rate		Exit Temp. (°F)	Water Vapor (%)	Exit Velocity (ft/s)
			(ACFM)	(DSCFM)			
Slakers Stack <sup>1</sup>	133	23.375 ID	657	461	141	Saturated	3.7
Lime Kiln Bin Baghouse	124	12 NPS	2000	2000	Ambient - 350	Ambient	61.6
Water Treat Bin Bag- house	14.0	8 NPS	1851	1851	Ambient	Ambient	18.5
White Liquor Pressure Filter Vent	79.0	10 NPS	1400	775	375	Saturated	30-66
Lime Mud Pressure Filter Vent	79.0	10 NPS	1400	850	375	Saturated	30-66
Stand-by Pressure Filter Vent	79.0	10 NPS	When in use, the same as the white liquor or lime mud pressure filter vents.				
North Lime Mud Precoat Filter	76.0	24 NPS	650	484	131	Saturated	3.4
South Lime Mud Precoat Filter	76.0	24 NPS	650	484	131	Saturated	3.4

Source: Buckeye Cellulose, 1986

1. Based on slaker test data.
2. Above grade.

The following data is needed for environmental permitting of the Causticizing Modernization Project:

Water Treat Lime Bins

	East	West
Diameter	18' ID	18' ID
Height Above Grade	49'6"	59'6"
Volume in Cubic Feet	8890 CF	6348 CF
Volume in Tons Lime	249	178

Water Treat Lime Bin Baghouse, Equipment No. 07-161

Type of Control Equipment Baghouse - Fuller Model 36FR8

Filter Size

a. Square feet of filter cloth 375

b. Type of Bags Polyester

Filter % Efficiency on Lime Dust .02 Grains/SCF

Design Air Flow Rate, ASCFM 1851 CFM at 14" Hg

Air: Cloth Ratio, ASCFM/Square Ft. 4.94 ASCFM/SF

Cleaning: Pulse on demand

Dimensions of Baghouse 4' diameter x 19' including conical hopper

Stack Diameter, Inches 8"

Stack Height Above Grade 14'

Grade Elevation Above Sea Level, Ft. 54'6"

Manufacturer of Baghouse Fuller Company

Design Housing MAP, In Hg 17

Operating Differential Pressure, In Hg 0-14

Causticizing New Lime Bin Baghouse, Equipment No. 08-1109

Type of Control Equipment Micro-Pulsair 100S-10TR Baghouse

Filter Size

a. Square feet of filter cloth 1,178 (100 filter elements)

b. Type of Bags Polyester, 16 oz/ft<sup>2</sup>, 275<sup>0F</sup>

Filter % Efficiency on Lime Dust 99.9%, 0.02 Grains/ACFT

Design Air Flow Rate, ASCFM 2000

Air: Cloth Ratio, ASCFM/Square Ft. 1.7

Cleaning: Pulse on demand

Dimensions of Baghouse 72" x 72" x 207" including pyramidal hopper

Stack Diameter, Inches 24"

Stack Height Above Grade 133'

Grade Elevation Above Sea Level, Ft. 55'0"

Manufacturer of Baghouse Micro-Pulsair Mikropul Corp.

Design Housing MAP, In H<sub>2</sub>O 16

Operating Differential Pressure, In H<sub>2</sub>O 4-6

SLAKERS WET SCRUBBER DESIGN DATA

Scrubber type: direct contact condenser

Water pressure: 20 psig

Operating number of nozzles: 2 (one per slaker vent)

Design nozzles: 6 total; 2 per slaker vent and 2 after combined flow

Operating water flow rate: 60 to 90 gpm

Water temperature: less than 90°F

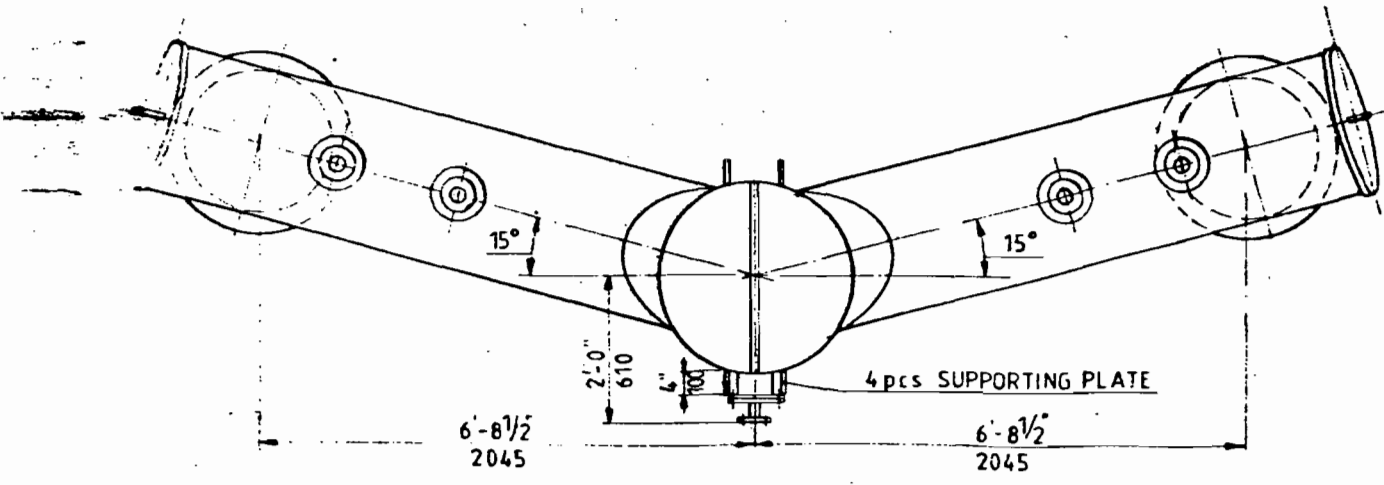
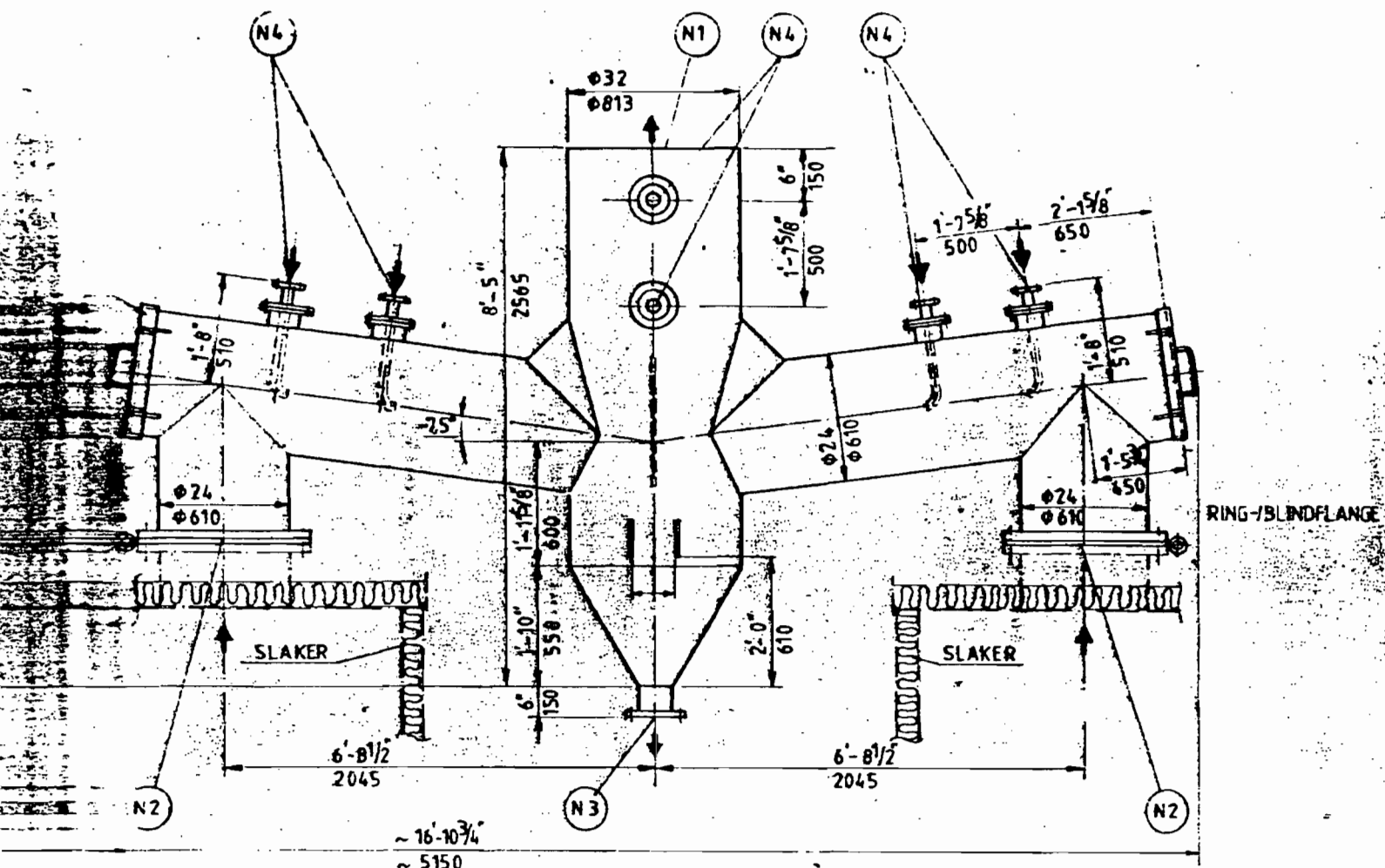
Efficiency: 90% minimum, per vendor information

Manufacturer: ENSO 2 x  $\phi$ 600/800 (See B-4a and B-4b)

Equipment number: 08-1022

Slaker internal design will minimize dust carryover. Design features include:

- \* Distance between lime feed chute and vent follow good engineering practice.
- \* Internal dust baffle suspended from roof between lime feed chute and grits conveyor reduces fugitive emissions.
- \* Slaker impeller is submerged.
- \* Enclosure of the slaker will be maximized to minimize the vent volume required to keep the slaker under negative pressure.
- \* The face velocity at the plenum of the slaker vent is low to minimize entrainment of dust in the exhaust gas stream.



85-12-14	2/2																			
85-11-27	P.C.																			
Fz-895	M. J. STEIN	M. J. STEIN																		

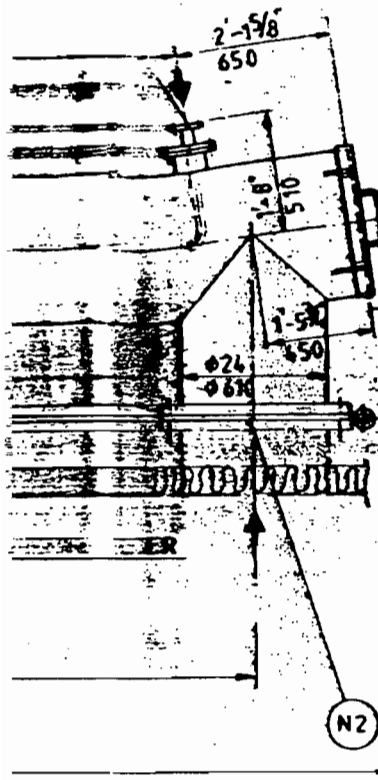
B-4a

7/14/57

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**NOZZLES**

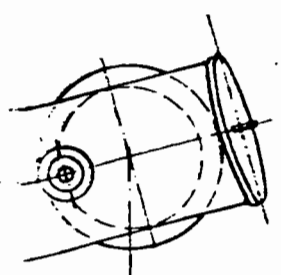
	SIZE	NUMBER	DRILLING	FACING	ORIENT	PROJ.	SERVICE
N 1	32"	DN800	1				VAPOUR
N 2	24"	DN600	2	150°			VAPOUR
N 3	6"	DN150	1	150°			WATER DRAIN
N 4	1 1/2"	DN 40	6	150°			MILL WATER
N 5							
N 6							
N 7							
N 8							
N 9							
N 10							



FLOW: 28 GALL/MIN — 10 PSI/WATERNOZZLE  
 43.8 --- / --- 30 --- / ---

WEIGHT: 2500 kg  
 5500 lbs.

MATERIAL: AISI 304 L



AE 923-5923  
 JOB FILE FL-8-157  
 EQUIP. NO. 08-1022  
 P. O. NO. FL-89106

**CERTIFIED**  
 ENSO-GUTZEIT OY  
 Engineering Division  
 Date DEC. 19 1985  
 Signature \_\_\_\_\_

P.O. FL 89106 HBP  
 AE 923-S923  
 EQ No 08-1022

Scale: 1:20	BUCKEYE CELLULOSE CO.	Pos: 022
ENSO EG	SCRUBBER 2 x Ø 600 / 800	1985-11-18
ENSO-GUTZEIT OY ENGINEERING DIVISION SAVONLINNA FINLAND	Typo:	65400144
		244708   B

B-46

7/16/87

Changes to Buckeye Causticizing Modernization Permit

AC62-107858

D. Control Devices: (See Section V, Item 4) (Section D precipitator information previously revised 1/17/86 in submittal)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Electrostatic Precipitator	Particulate	99.2%	Submicron	See Att. F,
(Vendor not yet selected)				pg. F-1, F-2
Process Controls	TRS	93.9%	Not Applicable	See Att. F,
				pg. F-3, F-4

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas	0.170 MMCF	0.170 MMCF	176
No. 6 Fuel Oil	1214 gallons	1214 gallons	176

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

Fuel Analysis: No. 6 Fuel Oil\*

Natural Gas: 1,040 BTU/scf

Percent Sulfur: 2.5% maximum

Percent Ash: 0.1 typical

Density: 8.1 lbs/gal Typical Percent Nitrogen: 0.4 based on 1 test

Heat Capacity: 17,901 BTU/lb 145,000 BTU/gal

Other Fuel Contaminants (which may cause air pollution): None

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

Annual Average None Maximum

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

Particulates collected in precipitator will be recycled dry back into the lime kiln (flow stream 11b). Grits from the two slakers (Streams 5a and 5b) and dregs and CaCO<sub>3</sub> from dregs filters (Stream 24) go to onsite solid waste disposal or process sewer. All liquid wastes go to NPDES treatment system.

\* Includes small quantity of used oil generated at the facility and burned as fuel. Oil does not contain PCB's.



The process flow diagram (Figure A-1) details the flow of materials and air emission points. A flow diagram (Figure A-2) is also provided for the existing systems.

The new causticizing system will consist of the following:

1. The existing Nos. 2, 3, and 4 smelt tanks will feed an existing tank, newly converted to be a surge tank. The surge tank will feed two existing tanks, newly converted to be green liquor clarifiers. A new dregs filter will support the green liquor clarifiers. The dregs filter is a fugitive total reduced sulfur (TRS) emission source.
2. Two new lime slakers, equipped with a condensing scrubber, will replace the existing pre-slakers and slakers. The new slakers and existing pre-slakers are sources of particulate (PM) emissions (Stream 2; refer to Figure A-1).
3. A new causticizing line will replace two existing causticizing lines.
4. The existing white liquor clarifiers, lime mud washers, mud precoat filter, and centrifuges and belt filters will be replaced by a white liquor pressure filter, a lime mud pressure filter, and two lime mud precoat filters. A third new pressure filter will be installed as a standby for the two new pressure filters. The new mud precoat filters will be fed from the lime mud surge tank after the lime mud pressure filter (Stream 10). Lime mud from water treatment (Stream 25) will also feed the surge tank. The new white liquor, lime mud pressure filters, and standby pressure filter are vented to the atmosphere and are TRS emission points (Streams 7a and 9). The new lime mud precoat filters are TRS emission sources.
5. The three existing lime kilns and the existing calciner, all with venturi scrubbers (total permitted lime product capacity of 784 TPD), will be replaced by a single 650-TPD lime product kiln with an electrostatic precipitator. This new lime kiln (No. 4

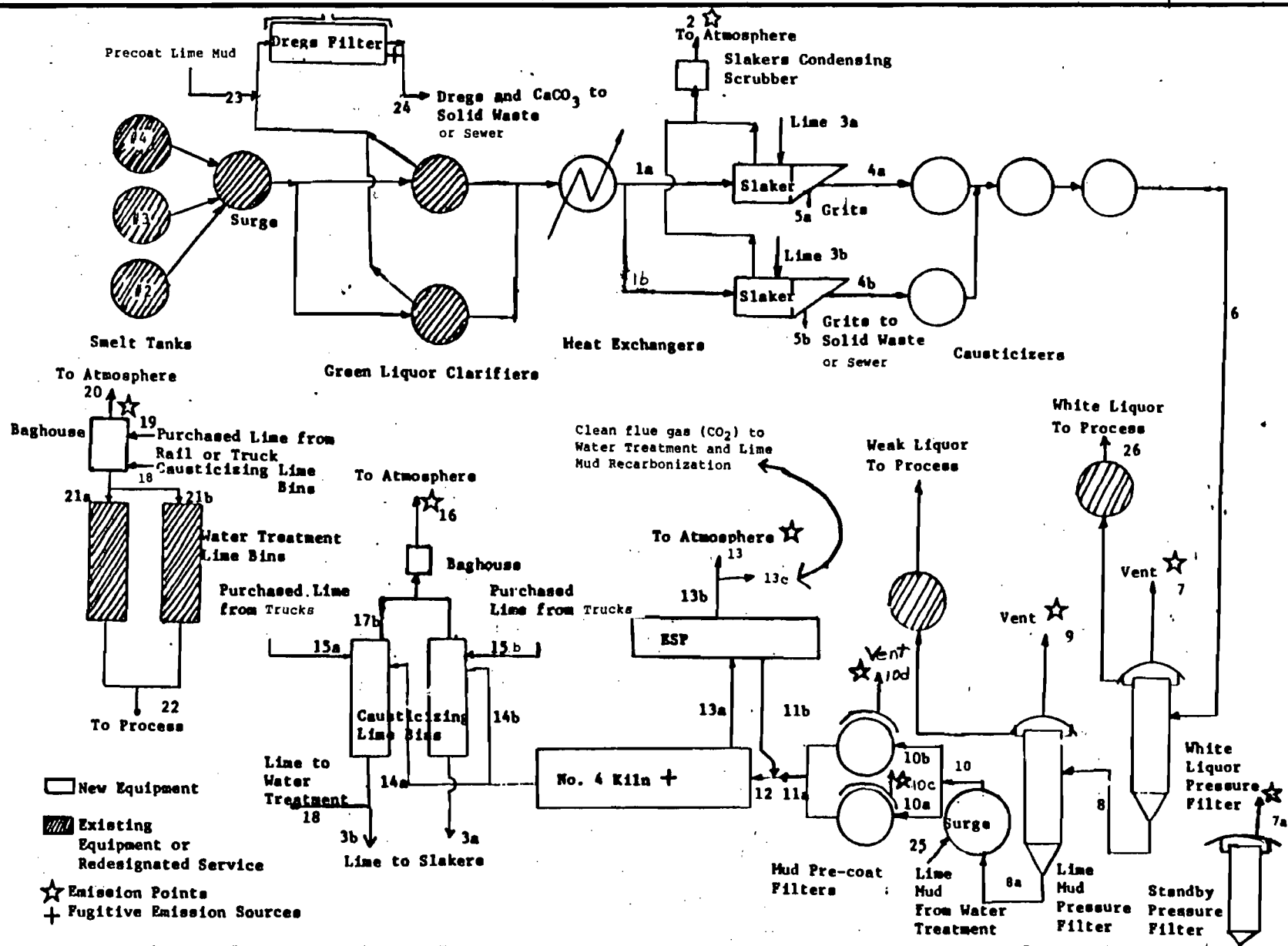
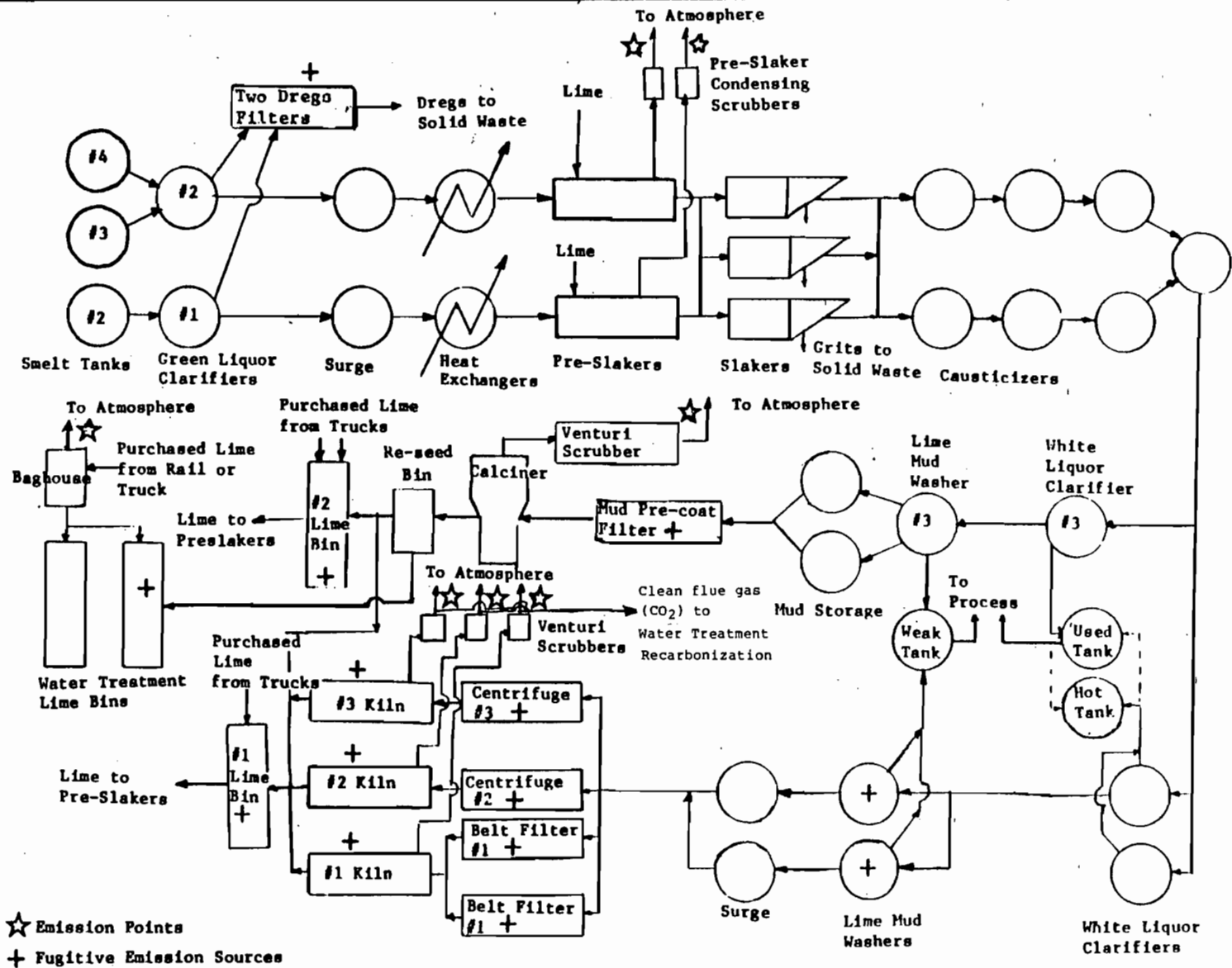


Figure A-1  
**CONCEPTUAL FLOW DIAGRAM — PROPOSED  
 CAUSTICIZING SYSTEM**

Revised 7/16/87

**Buckeye Cellulose  
 Corporation**



**Figure A-2**  
**CONCEPTUAL FLOW DIAGRAM — EXISTING**  
**CAUSTICIZING SYSTEM**

**Buckeye Cellulose**  
**Corporation**

Revised 7/16/87

Lime Kiln) will be a source of PM, TRS, sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) (Stream 13b). As with the old kilns, about 600 scfm clean fluegas (after the precipitator and continuous TRS / O<sub>2</sub> emission monitor) will continue to be directed to the existing fluegas compressor (Stream 13c). The clean fluegas contains CO<sub>2</sub>. About 450 scfm is used to recarbonate lime softened water supplies. About 450 scfm will be used to recarbonate water treatment lime mud (Stream 25).

6. The two existing causticizing lime bins, currently uncontrolled, will be replaced by two new causticizing lime bins, dust controlled by a single baghouse. The new causticizing lime bins will be sources of PM (Stream 16). The lime bins will receive lime from the kiln by bucket elevator (Streams 14a and b) and purchased lime by truck through pneumatic conveyors (Streams 15a and 15b). Lime will be transferred to the lime slakers (Streams 3a and b) by gravity feed or to the water treatment lime bins by pneumatic conveying (Stream 18).
7. The two existing water treatment lime bins will continue to be used for lime storage for water treatment. Currently, the existing baghouse controls dust emissions while lime is loaded into only one bin. The conveying system will be modified such that in the future the baghouse will control emissions (Stream 20) when loading lime into both bins (Streams 18 and 19). The water treatment lime bins will be capable of receiving purchased lime from rail or truck (Stream 19) or lime from the causticizing lime bins (Stream 18), all through pneumatic conveyors.

A site location map of the Buckeye Cellulose plant is presented in Figure A-3. A plot plan of the facility is shown in Figure A-4. Figures A-4 and A-5 detail the locations of the proposed emission points.

Construction of the new system is scheduled to begin as early as October 1985 and should be completed within two years.

This air construction permit application addresses the new No. 4 lime kiln. In addition, a Prevention of Significant Deterioration (PSD) source applicability analysis is presented, which quantifies emissions of regulated pollutants from the new sources and from the existing sources which will be shut down or modified. A companion air construction permit application addresses minor source emissions and fugitive emissions from the proposed project.

## 2.0 TRS CONTROL

Process design and control is the foundation of good TRS control. Best Demonstrated Technology (BDT) has long recognized the importance of such factors as good mud washing and good kiln combustion control to achieve good TRS control. The system design will provide TRS control equal to or better than BDT. We understand that it will be necessary to meet this level of control or retrofitting or replacement will be expected.

## 2.1 PRECOAT FILTER

The precoat filter size will be equal to or greater than BDT to assure good oxidation of the sulfides. Hot clean water will be used for washing. Fines from the ESP will be recycled in dry form directly to the kiln feed, bypassing the precoat filter. This removes some mud load from the filter and reduces plugging caused by fine particles, thereby improving filter effectiveness.

## 2.2 MUD WASHING

White liquor clarification and mud washing will be accomplished through the use of pressure filters. Pressure filters produce a higher solids mud than can be produced by conventional clarifiers. The higher solids mud allows greater dilution hence better washing thereby reducing residual chemicals in the lime mud feed to the kiln. This new technology also provides tighter process control and reliability than conventional clarifiers.

## 2.3 INERTS

Green liquor equipment included in this project will provide surge capacity and double the effective clarifier capacity. The improved green liquor quality will result in lower inerts in the lime mud, and thereby improve lime mud filterability. The lime mud from the water treatment softeners characteristically is high in inerts. Therefore prior to recycling, water treatment lime mud (Stream 25) will be recarbonated with clean flue gas (CO<sub>2</sub>), and centrifuged to remove the centrate which is high in inerts. The recarbonation improves the filterability characteristics allowing good mud washing on the precoat filter.

Therefore, this lower level of inerts in the lime mud feed means lower TRS emissions from the lime kiln.

#### 2.4 KILN COMBUSTION

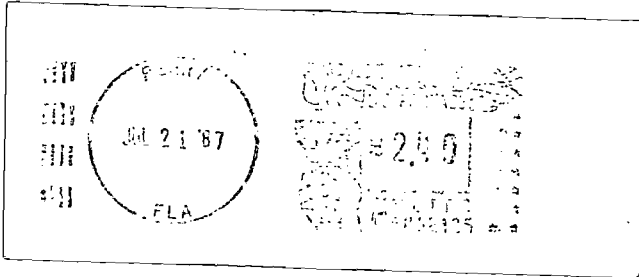
The design will include O<sub>2</sub> measurement in the stack and kiln plus cold end temperature measurement. Improved seals will reduce air in leakage thereby providing better kiln combustion control. The new kiln will be of modern, energy-efficient design.


#### 2.5 ESTIMATED CONTROL EFFICIENCY

From Attachment B, maximum TRS emissions = 3.28 lb/hr TRS as H<sub>2</sub>S

Potential TRS emissions = 53.5 lb/hr TRS as H<sub>2</sub>S

Efficiency =  $(53.5 - 3.28)/53.5 \times 100 = 93.9\%$



**Buckeye**   
 **first in**  
**cellulose**

**THE BUCKEYE CELLULOSE CORPORATION**  
**ROUTE 3, BOX 260 PERRY, FLORIDA 32347**

Mr. Bruce Mitchell  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

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