

Final Determination

The Buckeye Cellulose Corporation
Taylor County
Perry, Florida

Permit Numbers: AC 62-107857
AC 62-107858

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

November 27, 1985

Final Determination

The construction applications and attachments have been reviewed by the department. Public notice of the department's intent to issue was published in The Taco Times issue on October 23, 1985. The technical evaluation and preliminary determination were available for public inspection at the DER's Northeast District office and Bureau of Air Quality Management office.

Comments were received from Mr. John H. Millican, Environmental Control Manager with the Buckeye Cellulose Corporation - Perry Mill. The comments will become an attachment to the permits. The bureau's comments will follow and be numbered to correspond with the numbering of Mr. Millican's comments, which will not be restated:

A. Attachment I

- There will be some minor changes made to the preliminary determination. However, the changes are not significant such that public notice will be required.

B. Attachment II: Permit No. AC 62-107858

Cover Page:

- The bureau will make the following change within the 2nd paragraph, 4th sentence:

FROM: Also, three existing lime kilns (Nos. 1,2, and 3) and a calciner will be retired and dismantled.

TO: Also, three existing lime kilns (Nos. 1,2, and 3) and a calciner will be retired and their operating permits will be surrendered.

General Conditions:

- Since the citings are adopted rules by the department, editing of these conditions is not allowed.

Specific Conditions:

1. There will be no change made.
2. There will be no change made.
3. The bureau cannot approve the use of Method 16A. This must be obtained from Region IV EPA located in Atlanta, Georgia. The bureau will delete the last sentence in Specific Conditions No. 6 and No. 10, which was requested in the meeting with the bureau on November 21, 1985.

4. From a mass emission rate and the operational parameters, a limit in a certain time frame, such as pounds per hour, can be determined. Based on the operational parameters provided to the department and the mass emission rate pursuant to the NSPS, Subpart BB, the TRS lb/hr and TPY limits were calculated. Therefore, there will be no change made.
5. The bureau agrees and the following will be added to Specific Condition No. 9:
 - ° For PSD validation purposes, the requirement to test for SO₂ emissions shall be a one-time test requirement only, it must be a valid test, and shall not be an operation permit requirement.
6. The section does apply and there will be no change made.
7. The bureau agrees and the following changes shall be made.

No. 12:

FROM: Lime production by the lime kiln shall not exceed 27.08 tone per hour, 650 tons per day, and 237,250 tons per year. On a per month and annual basis, lime production shall be included in the AOR to be submitted to the Northeast District office.

TO: Lime production by the lime kiln shall not exceed 27.08 tons per hour, 650 tons per day, and 237,250 tons per year. On an annual basis, lime production shall be included in the AOR to be submitted to the Northeast District office.

8. The following changes shall be made:

No. 13:

FROM: The lime kiln shall demonstrate compliance with the permitted emissions limits pursuant to the provisions of FAC Rule 17-2.660(3)(b) and 40 CFR 60.8 while:

- a) Operating at a production rate of 27.08 tons per hour calcium oxide, burning 1214 gallons per hour of liquid fossil fuel.
- b) Operating at a production rate of 27.08 tons per hour calcium oxide, burning 170,000 cubic feet per hour @68°F of gaseous fossil fuel.

TO: The lime kiln shall demonstrate compliance with the permitted emissions limits pursuant to the provisions of FAC Rule 17-2.660(3)(b) and 40 CFR 60.8 while:

- a) Operating at a production rate of 27.08 tons per hour calcium oxide, not to exceed a maximum of 1214 gallons per hour of liquid fossil fuel.
- b) Operating at a production rate of 27.08 tons per hour calcium oxide, not to exceed a maximum of 170,000 cubic feet per hour @68°F of gaseous fossil fuel.

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

No. 16:

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

10. Limiting fuel consumption is a way of limiting the Btu heat input. The following changes shall be made:

No. 17:

FROM: The fuel input to the lime kiln shall not exceed 1214 gallons per hour and 10.6346 million gallons per year when liquid fossil fuel is burned; and, 170,000 cubic feet per hour and 1489.2 million cubic feet per year when gaseous fossil fuel is burned. On a per month basis, fuel consumption by type shall be included in the AOR to be submitted to the Northeast District office.

TO: The fuel input to the lime kiln shall not exceed 1214 gallons per hour and 10.6346 million gallons per year when liquid fossil fuel is burned; and 170,000 cubic feet per hour and 1489.2 million cubic feet per year when gaseous fossil fuel is burned. On an annual basis, fuel consumption by type shall be included in the AOR to be submitted to the Northeast District office.

11. This item was clarified in a meeting held on November 21, 1985, with the Buckeye Cellulose Corporation - Perry Mill personnel and the bureau.

C. Attachment III: Permit No. AC 62-107857

General Conditions:

° Since the citations are adopted rules by the department, editing of these conditions is not allowed.

Specific Conditions:

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

No. 3:

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

TO: All vehicular and railway deliveries of purchased lime to the causticizing and 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.

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

No. 6:

FROM: Input to the causticizing lime storage bins shall not exceed 27.08 tons per hour, 650 tons per day, and 175,900.8 tons per year from the lime kiln; and, shall not exceed 44.0 tons per hour from the loading of purchased lime.

TO: Input to the causticizing lime storage bins shall not exceed 27.08 tons per hour, 650 tons per day, and 237,250 tons per year from the lime kiln; and, shall not exceed 44.0 tons per hour from the loading of purchased lime.

3. The following changes shall be made:

No. 8:

FROM: The causticizing lime storage bins shall demonstrate compliance with the permitted emissions limit (no visible emissions) at the same time compliance is demonstrated for the lime kiln. Compliance shall be demonstrated while the lime-storage bins are simultaneously receiving 27.08 tons per hour lime from the lime kiln and 44.0 tons per hour of purchased lime from the resupply system (rail and/or truck).

TO: Compliance with the permitted emissions limit (no visible emissions) shall be demonstrated for the causticizing lime storage bins within 30 days after a valid compliance test has been demonstrated for the lime kiln. Initial compliance shall be demonstrated while the lime storage bins are simultaneously receiving 27.08 tons per hour lime from the lime kiln and 44.0 tons per hour of purchased lime from the resupply system (rail and/or truck). Future compliance tests shall be demonstrated while operating at 90-100% of the maximum permitted rate.

4. The following changes shall be made:

No. 9:

FROM: The water treatment lime storage bins shall demonstrate compliance with the permitted emission limit (no visible emissions). Compliance shall be demonstrated while the lime storage bins are receiving 22.0 tons per hour lime from the causticizing lime storage bins. Compliance shall also be demonstrated while receiving 22.0 tons per hour of purchased lime from the resupply system (rail and/or truck).

TO: Compliance with the permitted emissions limit (no visible emissions) shall be demonstrated for the water treatment lime storage bins. Initial compliance shall be demonstrated while the lime storage bins are receiving 22.0 tons per hour lime from the causticizing lime storage bins. Compliance shall also be demonstrated while receiving 22.0 tons per hour of purchased lime from the resupply system (rail and/or truck) and shall only be a one-time requirement if compliance is demonstrated. Future compliance tests shall be demonstrated while receiving lime from the causticizing lime storage bins and at 90-100% of the maximum permitted rate.

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

No. 13:

FROM: 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 compliance tests shall be conducted concurrently and while the causticizing system is producing 27.08 tons per hour lime through the lime kiln. 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)l.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)l.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.

DER

OCT 23 1985

BAQM

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 Proposed Agency Action on permit application was published in said newspaper in the issues of: Oct. 23, 1985

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 23 day of Oct., 1985

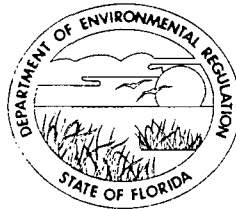
Andy B. Stephens
Notary Public

PROPOSED AGENCY ACTION ON PERMIT APPLICATIONS
The Department of Environmental Regulation gives notice of its intent to issue permits to The Buckeye Cellulose Corporation for the construction of a new No. 4 lime kiln, causticizing system, and lime handling system at the applicant's existing facility in Perry, Taylor County, Florida. A determination of best available control technology (BACT) was not required.
Persons 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 conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2500 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period constitutes a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.
If a petition is filed, the administration 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 Model 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, 2500 Blair Stone Road, Tallahassee, Florida 32301. 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 a.m. to 5 p.m., Monday through Friday, except legal holidays, at:
Dept. of Environmental Regulation
Northeast District
2425 Bill Road
Jacksonville, Florida 32207
Dept. of Environmental Regulation
Bureau of Air Quality Management
2500 Blair Stone Road
Tallahassee, Florida 32301
Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 20 days of the publication of this notice will be considered in the department's final determination.
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 prepared in legible form on white paper of 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.
October 23, 1985

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

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

Permit Number: AC 62-107858
Expiration Date: October 31, 1987
County: Taylor
Latitude/Longitude: 30° 03' 59" N/
83° 33' 12" W
Project: No. 4 Lime Kiln with an
associated electrostatic
precipitator

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 of the No. 4 Lime Kiln with an associated electrostatic precipitator (ESP) at the applicant's existing facility located in Perry, Taylor County, Florida. The lime kiln and associated ESP will be an interdependent part of the newly proposed causticizing system. The lime kiln will have a lime product capacity of 650 TPD. Also, three existing lime kilns (Nos. 1, 2, and 3) and a calciner will be retired and their operating permits will be surrendered. The lime kiln will be heated using natural gas and No. 6 fuel oil. Fuel oil maximum sulfur content shall not exceed 2.50% by weight. The UTM coordinates are zone 17, 256.74 km East and 3328.70 km North.

The Source Classification Codes are 3-07-001-06, 3-90-004-99, and 3-90-006-90.

Construction shall be in accordance with the permit application and plans, documents, amendments, and drawings except as otherwise noted pages 5-10 of the Specific Conditions.

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202 with attachments and Mr. John H. Millican's cover letter dated August 1, 1985.
2. Mr. C. H. Fancy's letter dated August 27, 1985.
3. Mr. John H. Millican's letter with attachment dated September 9, 1985.
4. Mr. John H. Millican's comments dated November 21, 1985.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-107858
Expiration Date: October 31, 1987

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 62-107858
Expiration Date: October 31, 1987

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- 07858
Expiration Date: October 31, 1987

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).
- (x) 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.

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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 test facilities for the lime kiln 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.
3. Visible emissions from the lime kiln shall be less than Number 1 on the Ringlemann Chart (20 percent opacity) pursuant to FAC Rule 17-2.610(2). Compliance tests shall be measured by DER Method 9 pursuant to FAC rule 17-2.700.

PERMITTEE:
The Buckeye Cellulose Corp.

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SPECIFIC CONDITIONS:

4. Particulate matter emissions from the lime kiln shall not exceed 0.21 g/dscm (0.091 gr/dscf) corrected to 10 percent oxygen, when liquid fossil fuel is burned (applicant's request), and 0.15 g/dscm (0.067 gr/dscf) corrected to 10 percent oxygen, when gaseous fossil is burned (FAC Rule 17-2.660(2)(a) and 40 CFR 60.282(a)(3)(i)). Compliance tests for particulate matter emissions shall be measured using EPA Methods 1, 2, 3, and 5, pursuant to 40 CFR 60, Appendix A, FAC Rule 17-2.700, 40 CFR 60.285(a)(1) through (4), and 40 CFR 60.285(b).

5. Particulate matter emissions from the lime kiln shall not exceed 56.2 lb/hr and 246.2 TPY when liquid fossil fuel is burned and 44.7 lb/hr and 195.8 TPY when gaseous fossil fuel is burned as determined by periodic compliance tests.

6. Total reduced sulfur emissions from the lime kiln shall not exceed 8 ppm by volume on a dry basis, corrected to 10 percent oxygen. Compliance tests for total reduced sulfur emissions shall be measured using EPA Method 16 and EPA Method 3 pursuant to 40 CFR 60, Appendix A, and FAC Rules 17-2.660(2)(b), 17-2.660(3)(b), 17-2.660(4)(a), 17-2.700 Table I; and 40 CFR 60.285(d).

7. Total reduced sulfur emissions from the lime kiln shall not exceed 3.04 lb/hr and 13.31 TPY when liquid fossil fuel is burned and 3.28 lb/hr and 14.37 TPY when gaseous fossil fuel is burned as determined by continuous emissions monitoring and verified by periodic compliance testing.

8. The sulfur content of liquid fossil fuel burned in the lime kiln shall not exceed 2.50 percent, by weight, as determined by EPA Method 19 pursuant to 40 CFR 60, Appendix A.

9. Sulfur dioxide emissions from the lime kiln shall not exceed 20.1 lb/hr and 85.4 TPY. Compliance test method shall be EPA Method 6 pursuant to Rule 17-2.700(6)(a)6. For PSD validation purposes, the requirement to test for SO₂ emissions shall be a one-time test requirement only, it must be a valid test, and shall not be an operation permit requirement.

10. A total reduced sulfur continuous emissions monitoring system shall be installed, certified, operated and maintained pursuant to the provisions of 40 CFR 60.28(a)(2)(i) and (ii), 40 CFR 60.284(c)(1), (2) and (3), FAC Rules 17-2.660(3)(e), 17-2.660(4)(b), 17-2.710(3)(b), and 40 CFR 60.13, 40 CFR 60 Appendix A, and 40 CFR 60 Appendix B.

PERMITTEE:
The Buckeye Cellulose Corp.

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SPECIFIC CONDITIONS:

11. A total reduced sulfur emissions report shall be provided to the Northeast District office on a quarterly basis pursuant to the provisions of FAC Rules 17-2.660(3)(a) and 17-2.710(4) and 40 CFR 60.7 and 40 CFR 60.284.

*Note 40 CFR 60.7 and 40 CFR 60.284 as adopted by the department require quarterly reporting.

Excess emissions of total reduced sulfur shall be determined quarterly pursuant to FAC rule 17-2.710(4)(c); and 40 CFR 60.284(d)(2).

12. Lime production by the lime kiln shall not exceed 27.08 tons per hour, 650 tons per day, and 237,250 tons per year. On an annual basis, lime production shall be included in the AOR to be submitted to the Northeast District office.

13. The lime kiln shall demonstrate compliance with the permitted emissions limits pursuant to the provisions of FAC Rule 17-2.660(3)(b) and 40 CFR 60.8 while:

a. Operating at a production rate of 27.08 tons per hour calcium oxide, not to exceed a maximum of 1214 gallons per hour of liquid fossil fuel.

b. Operating at a production rate of 27.08 tons per hour calcium oxide, not to exceed a maximum of 170,000 cubic feet per hour @68°F of gaseous fossil fuel.

14. The owner or operator of a source that has both a visible emissions and a particulate emissions limiting standard shall run their compliance tests concurrently.

15. A fuel flow guage shall be installed on each of the fuel lines (i.e., fuel oil, natural gas, etc.) to the lime kiln.

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

PERMITTEE
The Buckeye Cellulose Corp.

Permit Number: 107858
Expiration Date: October 31, 1987

SPECIFIC CONDITIONS:

17. The fuel input to the lime kiln shall not exceed 1214 gallons per hour and 10.6346 million gallons per year when liquid fossil fuel is burned; and, 170,000 cubic feet per hour and 1489.2 million cubic feet per year when gaseous fossil fuel is burned. On an annual basis, fuel consumption by type shall be included in the AOR to be submitted to the Northeast District office.

18. The lime kiln shall not be operated on a continuous basis or as an integral part of the process except as necessary to balance variables which directly relate to compliance with the permitted emission limits and to perform testing to demonstrate compliance with the permitted emission limits prior to receipt of an operation permit from the department or its designee the Northeast District office.

19. Unconfined emissions of particulate matter during construction and operation of the lime kiln shall comply with the provisions of FAC Rule 17-2.610(3). Reasonable precautions that might be taken shall include, but are not limited to:

- 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.

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SPECIFIC CONDITIONS:

20. The introduction of TRS gases from any source shall require an amendment to this permit prior to the actual introduction of the TRS gases.

21. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).

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

23. In accordance with FAC Rule 17-2.610(3), Unconfined Emissions of Particulate Matter, pollutant abatement equipment must be operating properly during operational production.

24. Upon receipt of an operation permit for the No. 4 Lime Kiln, the following permits shall be immediately surrendered to the department:
1) AO62-46527 - No. 1 Lime Kiln; 2) AO62-38423 - No. 2 Lime Kiln;
3) AO62-46530 - No. 3 Lime Kiln; 4) AO62-39144 - Calciner.

25. 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 compliance 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 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 may take up to 90 days to process a complete application. (FAC Rule 17-4.10)

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62 107858
Expiration Date: October 31, 1987

SPECIFIC CONDITIONS:

26. The contingency plan to deal with startup, shutdown, and malfunctions offered in the September 9, 1985, response shall become a part of this permit.

Issued this 27th day of Nov,
1985.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


VICTORIA J. TSCHINKEL, Secretary

 pages attached.

ATTACHMENT 4

Best Available 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

November 21, 1985

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

DER
NOV 21 1985
BAQM

Re: Comments on Proposed Action for Causticizing
Modernization Application to Construct
Permit Nos.: AC62-107857 and AC62-107858

Dear Mr. Fancy:

The purpose of this letter is to submit the attached written comments pursuant to your letter of October 14, 1985 on the Technical Evaluation and Preliminary Determination and proposed permits to construct a new no. 4 lime kiln, causticizing system, and lime handling system at our existing facility in Perry, Taylor County, Florida. These comments are being submitted within the 30 day time period of the October 23 publication of the public notice regarding the proposed action as required for consideration by the Department in the final determination.

Our comments are essentially minor changes, requests for clarification, and suggestions for simplification. We consider this a direct result of the thorough preparation by the Department to process our application. The extra effort, especially by Mr. Mitchell, throughout this application process has produced excellent results. We appreciate this very much. Upon receipt of favorable final determination, we will expedite completion of this modification which, as previously described, will result in significant benefits to the environment, the Department, the local community, and the Buckeye Cellulose Corporation.

Mr. Mitchell has agreed to a discussion of these comments at 1:30 p.m. on November 21, 1985 in the FDER office at Twin Towers. We appreciate this consideration and look forward to a mutually satisfactory resolution of these comments.

Very truly yours,

THE BUCKEYE CELLULOSE CORPORATION

J. H. Millican

J. H. Millican
Environmental Control Manager

JHM/eph
1744H

Attachment

11/21/85

ATTACHMENT I

BUCKEYE CELLULOSE CORPORATION
Taylor County
Perry, Florida

Comments on Technical Evaluation and Preliminary Determination

Permit Nos: AC 62-107857
AC 62-107858

1. Project Description, Section C, Controls, last paragraph:

We will enclose all material transfer systems which could generate unconfirmed particulate emissions in compliance with the provisions of FAC Rule 17-2.610(3) to take reasonable precautions to control unconfined particulate emissions. These are all dry hot lime product, precipitator catch, and lime transfer systems.

2. Rule Applicability, Table 3:

- a. The actual emissions values are based on actual production, hours of operation, and fuel consumption for the average of years 1983-84. This is consistent with the definition of actual emissions in FAC Rule 17-2.100(2)(a).
- b. The current actual TRS emissions are 156.6 TPY for existing lime reburning units. The TRS rule has not been approved by the EPA and hence its emission limits are not effective. We believe actual emission from these units should be 156.6 tons per year and these should be used in determining PSD applicability (Table 4) in accordance with FAC Rule 17-2.500(2). In addition, this emission level should be available for determining contemporaneous emissions until final compliance with the pending 20 part per million lime kiln limit is required; i.e., 54 months after final approval of the provision by EPA due to the replacement of the existing unit. It is clear that actual emissions are federally enforceable prior and during consideration of this application.

3. Rule Applicability, Table 4:

Table 4 includes an error which is insignificant, but for accuracy requires correction. The net TRS emission should be -7.56 TPY. The effort was in the application. We regret the inconvenience.

The more significant issue is that current actual emissions should be used and the correct net TRS emissions change is a decrease of 140.76 TPY.

4. Rule Applicability and Emissions Limitations:

Specific comments on rule applicability and emissions limitations within the Technical Evaluation and Preliminary Determination will be addressed in the other attachments. Hence, any consideration by the Department that results in change should also be reflected within the Technical Evaluation and Preliminary determination.

11/21/85

ATTACHMENT II

BUCKEYE CELLULOSE CORPORATION
Taylor County
Perry, Florida

Comments on the Proposed Construction Permit

Permit No: AC62-107858

Project: No. 4 Lime Kiln with an Associated Electrostatic Precipitator

1. Page 1, Paragraph 2:

To confirm and expand on discussions between Mr. Bruce Mitchell of the BAQM and Mr. Clint Thompson, the existing lime reburning units will be retired from service upon obtaining the operating permit for this application. Any future operation of these units would be subject to proper permitting. Termination of the operation of the units within the terms of the permit will be accomplished based on options available at that time. We believe this meets the commitments within the application and the needs of the Department.

GENERAL CONDITIONS:

1. Item 7 on page 3 of 10:

We, of course, expect to comply with provisions for access and inspection provided for in Florida Statute 403.091. However, this does not specifically include operation and maintenance practices, surrogate parameters and sampling or monitoring.

2. Item 8 on page 3 of 10:

We, of course, expect to comply with the notification requirements in Florida statutes. Notification requirements are currently a subject of intense workshop discussion. We respectfully request that notification requirements as a condition of this permit not be expanded pending final resolution of the notification regulations.

3. Item 10 on page 4 of 10:

We request that Item 10 be clarified by inserting "as required by FAC Rule 17-4.08" after the word "comply".

4. Item 14-b on page 5 of 10:

Buckeye requests that the time period for retention of records be for "at least two years", not three years. This is consistent with the Department's adoption of 40 CFR 60.7.

SPECIFIC CONDITIONS

1. Item 3 on page 5 of 10:

Buckeye Cellulose accepts the permit limitation of 20% opacity except as otherwise permitted. However, we request deletion of "pursuant to FAC Rule 17-2.610(2)" as inapplicable.

2. Items 4 and 5 on page 6 of 10:

The application of mass emission limits as a permit condition is not supported by the New Source Performance Standard (NSPS). Applicable limits pursuant to FAC Rule 17-2.660 and 40 CFR 60.282 are:

- a. For gas burning: 0.067 gr/dscf corrected to 10% O₂
- b. For oil burning: 0.13 gr/dscf corrected to 10% O₂

We fully understand the Department's need to insure PSD review was not required for particulate emissions. We, therefore, agree that at no time will particulate matter from the kiln exceed 56.2 lbs/hr and 246.16 TPY. We believe this meets the true needs of the Department without being burdensome on the applicant.

3. Items 6 and 10 on page 6 of 10:

We request approval of EPA Method 16A for demonstration of compliance. The basis of this request is that EPA Method 16A has been approved for use by other applicants and by EPA.

4. Item 7 on page 6 of 10:

The application of mass emission limits as a permit condition is not supported by the NSPS. Applicable limits pursuant to FAC Rule 17-2.660 and 40 CFR 60.283 are: 8 ppm by volume on a dry basis corrected to 10% O₂ based on 12-hour averages. As in the previous comment, we believe the mass emission limit is burdensome and is not required to ensure PSD applicability.

5. Item 9 on page 6 of 10:

A mass emission limit for sulfur dioxide is not supported by the NSPS. We understand the Department's desire to ensure PSD review for sulfur dioxide was not required. The data submitted in our application showed PSD review is not required. However, if the Department would like confirmation, we would propose a one-time special test prior to application for the operating permit. We believe the mass emission limit is burdensome and that a special test meets the Department's needs.

6. Item 10 on page 6 of 10 and Item 11 on page 7 of 10:

We believe the references to FAC Rule 17-2.710 are inappropriate and should be deleted because that section does not apply.

7. Item 12 on page 7 of 10:

We request deletion of monthly data on Annual Operation Reports. Annual Operating Report information should agree with information requested on the form.

8. Item 13 on page 7 of 10:

We request revision of this condition as follows:

"The lime kiln shall demonstrate initial compliance with the permitted emission limits pursuant to the provisions of FAC Rule 17-2.660(3)(b) and 40 CFR 60.8 while:

- a. Operating at a production rate not to exceed 27.08 tons/hr lime product and a heat input not to exceed 176 MMBTU/hr of liquid fossil fuel.
- b. Operating at a production rate not to exceed 27.08 tons/hr lime product and a heat input not to exceed 176 MMBTU/hr gaseous fossil fuel."

We believe this protects the Department's interest of demonstrating compliance at maximum permitted rate. Also, this should protect your concern for ambient air impact. Future compliance testing should meet the requirements of testing within 90% of the maximum permitted rate.

9. Item 16 on page 7 of 10:

We request item 16 be clarified as follows:

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

This is consistent with previous discussions with the Department.

10. Item 17 on page 8 of 10:

As indicated in the previous comment, a kiln fuel consumption limit should be based on a not to exceed 176 MMBTU/hr heat input. We request deletion of monthly data on Annual Operating Reports. Annual Operating Report information should agree with information requested on the form.

11. Item 18 on page 8 of 10:

We request clarification of this condition.

ATTACHMENT III

BUCKEYE CELLULOSE CORPORATION
Taylor County
Perry, Florida

Comments on the Proposed Construction Permit

Permit No: AC 62-107857

Project: New Causticizing System and Lime Handling System

GENERAL CONDITIONS

1. Item 7 on page 3 of 9:

We, of course, expect to comply with provisions for access and inspection provided for in Florida Statute 403.091. However, this does not specifically include operation and maintenance practices, surrogate parameters, and sampling or monitoring.

2. Item 8 on page 3 of 9:

We, of course, expect to comply with the notification requirements in Florida statutes. Notification requirements are currently a subject of intense workshop discussion. We respectfully request that notification requirements as a condition of this permit not be expanded pending final resolution of the notification regulations.

3. Item 10 on page 4 of 9:

We request that Item 10 be clarified by inserting "as required by FAC Rule 17-4.08" after the word "comply".

4. Item 14-b on page 5 of 9:

Buckeye requests that the time period for retention of records be for "at least two years", not three years. This is consistent with historical and recent Department actions.

SPECIFIC CONDITIONS

1. Item 3 on page 6 of 9:

We request deletion of monthly data on Annual Operating Reports. Annual Operating Report information should agree with information requested on the form.

2. Item 6 on page 7 of 9:

There is an error in the tons per year figure for input to the causticizing lime storage bins from the lime kiln. The correct figure is 237,250 TPY.

3. Item 8 on page 7 or 9:

We request revision of this condition as follows:

"The causticizing lime storage bins shall demonstrate initial compliance with the permitted emissions limit (no visible emissions) while the lime bins are simultaneously receiving lime product at a rate not to exceed 27.08 tons per hour from the kiln and purchased lime from the resupply system (rail and/or truck) at a rate not to exceed 44.0 tons per hour."

We believe this protects the Department's interest in demonstrating compliance at maximum permitted rate. Future compliance testing should meet the requirements of testing within 90% of the maximum permitted rate.

4. Item 9 on page 7 of 9:

We request revision of this condition as follows:

"The water treatment lime storage bins shall demonstrate initial compliance with the permitted emission limit (no visible emissions). Initial compliance shall be demonstrated while the lime bins are receiving lime from the causticizing lime storage bins at a rate not to exceed 22.0 tons per hour."

We believe this protects the Department's interest in demonstrating compliance at maximum permitted rate. Also, this should protect your concern for ambient air impact. We believe additional testing of the purchased limit resupply alternative is burdensome. Future compliance testing should meet the requirements of testing within 90% of the maximum permitted rate.

5. Item 13 on page 8 of 9:

We request revision of this item regarding test conditions as follows:

"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."

6. Item 14 on page 8 of 9:

We request revision of this item as follows:

"Failure of a control system(s) to meet the applicable and maximum particulate or opacity emissions limiting standard and/or limit shall not be ground for requesting a variance or relaxation of that standard and/or limit."

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

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

Permit Number: AC 62-107857
Expiration Date: October 31, 1987
County: Taylor
Latitude/Longitude: 30° 03' 59" N/
83° 33' 12" W
Project: New Causticizing System
and Lime Handling 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 of a new causticizing system and lime handling system, which are further described: 3 existing smelt tanks (Nos. 2, 3 and 4), a smelt surge tank, 2 green liquor clarifiers, 2 dregs filters (1 existing), 2 lime slakers equipped with a condensing scrubber, a white liquor pressure filter, a lime mud surge tank, 2 causticizing lime storage bins with an associated baghouse system (will receive lime from the No. 4 lime kiln and purchased lime from rail or truck), and 2 existing water treatment lime storage bins with an associated baghouse system (will receive lime from the causticizing lime storage bins and purchased lime from rail or truck). The proposed project will be constructed at the applicant'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 Codes are 3-07-001-99 and 3-07-001-02.

Construction shall be in accordance with the permit application and plans, documents, and drawings except as otherwise noted on pages 5-9 of the Specific Conditions.

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202, with attachments and Mr. John H. Millican's cover letter dated August 1, 1985.
2. Mr. John H. Millican's comments dated November 21, 1985.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-107857
Expiration Date: October 31, 1987

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 62-107857
Expiration Date: October 31, 1987

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 62-107857
Expiration Date: October 31, 1987

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 62-107857
Expiration Date: October 31, 1987

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. Each baghouse system associated with and controlling the two causticizing lime storage bins and the two water treatment lime storage bins shall not exhibit any visible emissions (5% opacity) pursuant to FAC Rule 17-2.610(3). Compliance test method shall be DER Method 9 pursuant to FAC Rule 17-2.700.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-107857
Expiration Date: October 31, 1987

SPECIFIC CONDITIONS:

3. All vehicular and railway deliveries of purchased lime to the causticizing and 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 causticizing and water treatment lime storage bins shall not exceed 0.02 gr/dscf (causticizing: 0.34 lb/hr, 1.50 TPY; water treatment: 0.10 lb/hr, 0.45 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 62-107857
Expiration Date: October 31, 1987

SPECIFIC CONDITIONS:

6. Input to the causticizing lime storage bins shall not exceed 27.08 tons per hour, 650 tons per day, and 237,250 tons per year from the lime kiln; and, shall not exceed 44.0 tons per hour from the loading of purchased lime.
7. Input to the water treatment lime storage bins shall not exceed 22.0 tons per hour total from either causticizing lime storage bins or the loading of purchased lime, or both.
8. Compliance with the permitted emissions limit (no visible emissions) shall be demonstrated for the causticizing lime storage bins within 30 days after a valid compliance test has been demonstrated for the lime kiln. Initial compliance shall be demonstrated while the lime storage bins are simultaneously receiving 27.08 tons per hour lime from the lime kiln and 44.0 tons per hour of purchased lime from the resupply system (rail and/or truck). Future compliance tests shall be demonstrated while operating at 90-100% of the maximum permitted rate.
9. Compliance with the permitted emissions limit (no visible emissions) shall be demonstrated for the water treatment lime storage bins. Initial compliance shall be demonstrated while the lime storage bins are receiving 22.0 tons per hour lime from the causticizing lime storage bins. Compliance shall also be demonstrated while receiving 22.0 tons per hour of purchased lime from the resupply system (rail and/or truck) and shall only be a one-time requirement if compliance is demonstrated. Future compliance tests shall be demonstrated while receiving lime from the causticizing lime storage bins and at 90-100% of the maximum permitted rate.
10. In accordance with FAC Rule 17-2.620(2), objectionable odors shall not be allowed off plant property.
11. 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.
12. The causticizing system is subject to the provisions of FAC Rule 17-2.250, Excess Emissions.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-107857
Expiration Date: October 31, 1985

SPECIFIC CONDITIONS:

13. 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)l.c.i. Future compliance tests shall be demonstrated while operating at 90-100% of the maximum permitted rate.

14. 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.

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

16. 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.

17. 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 62-107857
Expiration Date: October 31, 1987

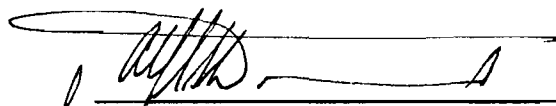
SPECIFIC CONDITIONS:

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 27th day of Nov,
1985.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

ATTACHMENT 2

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

November 21, 1985

DER
NOV 21 1985
BAQM

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Re: Comments on Proposed Action for Causticizing
Modernization Application to Construct
Permit Nos.: AC62-107857 and AC62-107858

Dear Mr. Fancy:

The purpose of this letter is to submit the attached written comments pursuant to your letter of October 14, 1985 on the Technical Evaluation and Preliminary Determination and proposed permits to construct a new no. 4 lime kiln, causticizing system, and lime handling system at our existing facility in Perry, Taylor County, Florida. These comments are being submitted within the 30 day time period of the October 23 publication of the public notice regarding the proposed action as required for consideration by the Department in the final determination.

Our comments are essentially minor changes, requests for clarification, and suggestions for simplification. We consider this a direct result of the thorough preparation by the Department to process our application. The extra effort, especially by Mr. Mitchell, throughout this application process has produced excellent results. We appreciate this very much. Upon receipt of favorable final determination, we will expedite completion of this modification which, as previously described, will result in significant benefits to the environment, the Department, the local community, and the Buckeye Cellulose Corporation.

Mr. Mitchell has agreed to a discussion of these comments at 1:30 p.m. on November 21, 1985 in the FDER office at Twin Towers. We appreciate this consideration and look forward to a mutually satisfactory resolution of these comments.

Very truly yours,

THE BUCKEYE CELLULOSE CORPORATION

J. H. Millican

J. H. Millican
Environmental Control Manager

JHM/eph
1744H

Attachment

11/21/85

ATTACHMENT I

BUCKEYE CELLULOSE CORPORATION
Taylor County
Perry, Florida

Comments on Technical Evaluation and Preliminary Determination

Permit Nos: AC 62-107857
AC 62-107858

1. Project Description, Section C, Controls, last paragraph:

We will enclose all material transfer systems which could generate unconfirmed particulate emissions in compliance with the provisions of FAC Rule 17-2.610(3) to take reasonable precautions to control unconfined particulate emissions. These are all dry hot lime product, precipitator catch, and lime transfer systems.

2. Rule Applicability, Table 3:

- a. The actual emissions values are based on actual production, hours of operation, and fuel consumption for the average of years 1983-84. This is consistent with the definition of actual emissions in FAC Rule 17-2.100(2)(a).
- b. The current actual TRS emissions are 156.6 TPY for existing lime reburning units. The TRS rule has not been approved by the EPA and hence its emission limits are not effective. We believe actual emission from these units should be 156.6 tons per year and these should be used in determining PSD applicability (Table 4) in accordance with FAC Rule 17-2.500(2). In addition, this emission level should be available for determining contemporaneous emissions until final compliance with the pending 20 part per million lime kiln limit is required; i.e., 54 months after final approval of the provision by EPA due to the replacement of the existing unit. It is clear that actual emissions are federally enforceable prior and during consideration of this application.

3. Rule Applicability, Table 4:

Table 4 includes an error which is insignificant, but for accuracy requires correction. The net TRS emission should be -7.56 TPY. The effort was in the application. We regret the inconvenience.

The more significant issue is that current actual emissions should be used and the correct net TRS emissions change is a decrease of 140.76 TPY.

4. Rule Applicability and Emissions Limitations:

Specific comments on rule applicability and emissions limitations within the Technical Evaluation and Preliminary Determination will be addressed in the other attachments. Hence, any consideration by the Department that results in change should also be reflected within the Technical Evaluation and Preliminary determination.

11/21/85

ATTACHMENT II

BUCKEYE CELLULOSE CORPORATION
Taylor County
Perry, Florida

Comments on the Proposed Construction Permit

Permit No: AC62-107858

Project: No. 4 Lime Kiln with an Associated Electrostatic Precipitator

1. Page 1, Paragraph 2:

To confirm and expand on discussions between Mr. Bruce Mitchell of the BAQM and Mr. Clint Thompson, the existing lime reburning units will be retired from service upon obtaining the operating permit for this application. Any future operation of these units would be subject to proper permitting. Termination of the operation of the units within the terms of the permit will be accomplished based on options available at that time. We believe this meets the commitments within the application and the needs of the Department.

GENERAL CONDITIONS:

1. Item 7 on page 3 of 10:

We, of course, expect to comply with provisions for access and inspection provided for in Florida Statute 403.091. However, this does not specifically include operation and maintenance practices, surrogate parameters and sampling or monitoring.

2. Item 8 on page 3 of 10:

We, of course, expect to comply with the notification requirements in Florida statutes. Notification requirements are currently a subject of intense workshop discussion. We respectfully request that notification requirements as a condition of this permit not be expanded pending final resolution of the notification regulations.

3. Item 10 on page 4 of 10:

We request that Item 10 be clarified by inserting "as required by FAC Rule 17-4.08" after the word "comply".

4. Item 14-b on page 5 of 10:

Buckeye requests that the time period for retention of records be for "at least two years", not three years. This is consistent with the Department's adoption of 40 CFR 60.7.

SPECIFIC CONDITIONS

1. Item 3 on page 5 of 10:

Buckeye Cellulose accepts the permit limitation of 20% opacity except as otherwise permitted. However, we request deletion of "pursuant to FAC Rule 17-2.610(2)" as inapplicable.

2. Items 4 and 5 on page 6 of 10:

The application of mass emission limits as a permit condition is not supported by the New Source Performance Standard (NSPS). Applicable limits pursuant to FAC Rule 17-2.660 and 40 CFR 60.282 are:

- a. For gas burning: 0.067 gr/dscf corrected to 10% O₂
- b. For oil burning: 0.13 gr/dscf corrected to 10% O₂

We fully understand the Department's need to insure PSD review was not required for particulate emissions. We, therefore, agree that at no time will particulate matter from the kiln exceed 56.2 lbs/hr and 246.16 TPY. We believe this meets the true needs of the Department without being burdensome on the applicant.

3. Items 6 and 10 on page 6 of 10:

We request approval of EPA Method 16A for demonstration of compliance. The basis of this request is that EPA Method 16A has been approved for use by other applicants and by EPA.

4. Item 7 on page 6 of 10:

The application of mass emission limits as a permit condition is not supported by the NSPS. Applicable limits pursuant to FAC Rule 17-2.660 and 40 CFR 60.283 are: 8 ppm by volume on a dry basis corrected to 10% O₂ based on 12-hour averages. As in the previous comment, we believe the mass emission limit is burdensome and is not required to ensure PSD applicability.

5. Item 9 on page 6 of 10:

A mass emission limit for sulfur dioxide is not supported by the NSPS. We understand the Department's desire to ensure PSD review for sulfur dioxide was not required. The data submitted in our application showed PSD review is not required. However, if the Department would like confirmation, we would propose a one-time special test prior to application for the operating permit. We believe the mass emission limit is burdensome and that a special test meets the Department's needs.

6. Item 10 on page 6 of 10 and Item 11 on page 7 of 10:

We believe the references to FAC Rule 17-2.710 are inappropriate and should be deleted because that section does not apply.

7. Item 12 on page 7 of 10:

We request deletion of monthly data on Annual Operation Reports. Annual Operating Report information should agree with information requested on the form.

8. Item 13 on page 7 of 10:

We request revision of this condition as follows:

"The lime kiln shall demonstrate initial compliance with the permitted emission limits pursuant to the provisions of FAC Rule 17-2.660(3)(b) and 40 CFR 60.8 while:

- a. Operating at a production rate not to exceed 27.08 tons/hr lime product and a heat input not to exceed 176 MMBTU/hr of liquid fossil fuel.
- b. Operating at a production rate not to exceed 27.08 tons/hr lime product and a heat input not to exceed 176 MMBTU/hr gaseous fossil fuel."

We believe this protects the Department's interest of demonstrating compliance at maximum permitted rate. Also, this should protect your concern for ambient air impact. Future compliance testing should meet the requirements of testing within 90% of the maximum permitted rate.

9. Item 16 on page 7 of 10:

We request item 16 be clarified as follows:

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

This is consistent with previous discussions with the Department.

10. Item 17 on page 8 of 10:

As indicated in the previous comment, a kiln fuel consumption limit should be based on a not to exceed 176 MMBTU/hr heat input. We request deletion of monthly data on Annual Operating Reports. Annual Operating Report information should agree with information requested on the form.

11. Item 18 on page 8 of 10:

We request clarification of this condition.

11/21/85

ATTACHMENT III

BUCKEYE CELLULOSE CORPORATION
Taylor County
Perry, Florida

Comments on the Proposed Construction Permit

Permit No: AC 62-107857

Project: New Causticizing System and Lime Handling System

GENERAL CONDITIONS

1. Item 7 on page 3 of 9:

We, of course, expect to comply with provisions for access and inspection provided for in Florida Statute 403.091. However, this does not specifically include operation and maintenance practices, surrogate parameters, and sampling or monitoring.

2. Item 8 on page 3 of 9:

We, of course, expect to comply with the notification requirements in Florida statutes. Notification requirements are currently a subject of intense workshop discussion. We respectfully request that notification requirements as a condition of this permit not be expanded pending final resolution of the notification regulations.

3. Item 10 on page 4 of 9:

We request that Item 10 be clarified by inserting "as required by FAC Rule 17-4.08" after the word "comply".

4. Item 14-b on page 5 of 9:

Buckeye requests that the time period for retention of records be for "at least two years", not three years. This is consistent with historical and recent Department actions.

SPECIFIC CONDITIONS

1. Item 3 on page 6 of 9:

We request deletion of monthly data on Annual Operating Reports. Annual Operating Report information should agree with information requested on the form.

2. Item 6 on page 7 of 9:

There is an error in the tons per year figure for input to the causticizing lime storage bins from the lime kiln. The correct figure is 237,250 TPY.

3. Item 8 on page 7 or 9:

We request revision of this condition as follows:

"The causticizing lime storage bins shall demonstrate initial compliance with the permitted emissions limit (no visible emissions) while the lime bins are simultaneously receiving lime product at a rate not to exceed 27.08 tons per hour from the kiln and purchased lime from the resupply system (rail and/or truck) at a rate not to exceed 44.0 tons per hour."

We believe this protects the Department's interest in demonstrating compliance at maximum permitted rate. Future compliance testing should meet the requirements of testing within 90% of the maximum permitted rate.

4. Item 9 on page 7 of 9:

We request revision of this condition as follows:

"The water treatment lime storage bins shall demonstrate initial compliance with the permitted emission limit (no visible emissions). Initial compliance shall be demonstrated while the lime bins are receiving lime from the causticizing lime storage bins at a rate not to exceed 22.0 tons per hour."

We believe this protects the Department's interest in demonstrating compliance at maximum permitted rate. Also, this should protect your concern for ambient air impact. We believe additional testing of the purchased limit resupply alternative is burdensome. Future compliance testing should meet the requirements of testing within 90% of the maximum permitted rate.

5. Item 13 on page 8 of 9:

We request revision of this item regarding test conditions as follows:

"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."

6. Item 14 on page 8 of 9:

We request revision of this item as follows:

"Failure of a control system(s) to meet the applicable and maximum particulate or opacity emissions limiting standard and/or limit shall not be ground for requesting a variance or relaxation of that standard and/or limit."