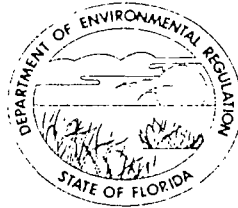


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

October 14, 1985

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. C. E. Wertheimer
Plant Manager
The Buckeye Cellulose Corporation
Rt. 3, Box 260
Perry, Florida 32347

Dear Mr. Wertheimer:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permits to construct a new No. 4 lime kiln, causticizing system, and lime handling system at your existing facility in Perry, Taylor County, Florida.

Before final action can be taken on your draft permits, you are required by Florida Administrative Code Rule 17-103.150 to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Taylor County no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice may be grounds for denial of the permits.

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,

for Bill Thomas
C. H. Fancy, P.E.

Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Attachments

cc: David A. Buff, P.E.
Johnny Cole, NE District

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of an)
Application for Permit by:)
)
The Buckeye Cellulose Corp.) DER File No. AC 62-107857
Rt. 3, Box 260) AC 62-107858
Perry, Florida 32347)

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its Intent to Issue, and proposed order of issuance for, a permit pursuant to Chapter 403, Florida Statutes, for the proposed project as detailed in the application 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 August 6, 1985 to DER for a permit to construct an a new No. 4 lime kiln, causticizing system, and lime handling system at the applicant's facility 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 applicant was officially notified by the Department that an air construction permit was required for the proposed work.

This intent to issue shall be placed before the Secretary for final action unless an appropriate petition for a hearing pursuant to the provisions of Section 120.57, Florida Statutes, is filed within fourteen (14) days from receipt of this letter or

publication of the public notice (copy attached) required pursuant to Rule 17-103.150, Florida Administrative Code, whichever occurs first. The petition must comply with the requirements of Section 17-103.155 and Rule 28-5.201, Florida Administrative Code (copy attached) and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32301.

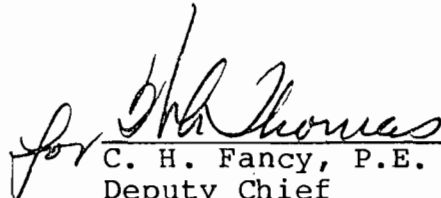
Petitions which are not filed in accordance with the above provisions are subject to dismissal by the Department. In the event a formal hearing is conducted pursuant to Section 120.57(1), all parties shall have an opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witnesses and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exceptions to any order or hearing officer's recommended order, and to be represented by counsel. If an informal hearing is requested, the agency, in accordance with its rules of procedure, will provide affected persons or parties or their counsel an opportunity, at a convenient time and place, to present to the agency or hearing officer, written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), 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 Model Rule 28-5.207 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, 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 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.

Executed the 11 day of October, 1985, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

Mr. C. E. Wertheimer, Jr.
Plant Manager
The Buckeye Cellulose Corporation
Rt. 3, Box 260
Perry, Florida 32347

Mr. David A. Buff, P.E.
Environmental Science and Engineering
Post Office Box ESE
Gainesville, Florida 32602

Mr. Johnny Cole
DER Northeast District
3426 Bills Road
Jacksonville, Florida 32207

CERTIFICATION

This is to certify that the foregoing Intent to Issue and all copies were mailed before the close of business on Oct. 14, 1985.

for C. H. Fancy

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

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

Patricia B. Adams Oct. 14, 1985
Clerk Date

State of Florida
Department of Environmental Regulation
Notice of 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 2600 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 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 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, 2600 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, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

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

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 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 30 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 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.

Technical Evaluation
and
Preliminary Determination

The Buckeye Cellulose Corporation
Taylor County
Perry, Florida

Permit Numbers:
AC 62-107857
62-107858

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

October 14, 1985

I. Project Description

A. Applicant

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

B. Project

The applicant proposes to modify its existing mill by constructing a new causticizing system and lime handling system, which is further described in the following:

- o 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. One existing and a new dregs filter will support the green liquor clarifiers.
- o Two new lime slakers, equipped with a condensing scrubber, will replace the existing pre-slakers and slakers.
- o A new causticizing line will replace two existing causticizing lines.
- o The existing white liquor clarifiers, lime mud washers, mud precoat filter, 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 stand-by 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. Lime mud from water treatment will also feed the surge tank. The new white liquor and lime mud pressure filters are vented to the atmosphere.
- o 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 (27.08 TPH) lime product kiln with an electrostatic precipitator system.
- o The two existing causticizing lime bins, currently uncontrolled, will be replaced by two new causticizing lime bins, dust controlled by a single baghouse system. The lime bins will receive lime from the kiln by bucket elevator and purchased lime by rail or truck through pneumatic conveyors. Lime will be transferred to the

lime slakers by gravity feed or to the water treatment lime bins by pneumatic conveyoring.

- o The two existing water treatment lime bins will continue to be used for lime storage for water treatment. Currently, the existing baghouse system controls dust emissions while lime is loaded into only one bin. The conveying system will be modified such that in the future the baghouse system will control emissions when loading lime into both bins. The water treatment lime bins will be capable of receiving purchased lime from rail or truck and lime from the causticizing lime bins, all through pneumatic conveyors.

C. Process and Controls

- o Causticizing System

A surge tank receives green liquor slurry from the Nos. 2, 3 and 4 smelt dissolving tanks, which has dissolved smelt from a recovery furnace(s) with water and/or weak liquor (dilute solution of sodium hydroxide, sulfide, and carbonates). Two green liquor clarifiers receive green liquor slurry from the surge tank. The insoluble inorganic materials (dregs) settle to the bottom, are removed and transferred to two dregs filtering units, which further washes the dregs. The resultant dregs are removed and landfilled.

The clarified green liquor is pumped to two lime slakers, where it is reacted with calcium oxide. Here, the slaking and initial causticizing reactions take place. The unreactive material, called grits, is removed from the classifying section, discarded and landfilled.

The liquor slurry overflow from each lime slaker flows into a separate causticizer and then through two additional causticizers in series, where the causticizing reaction is brought to equilibrium. The liquor slurry is then pumped into a white liquor pressure filter for the separation of the calcium carbonate precipitate (lime mud) from the liquor (white liquor). The filtered white liquor is pumped to the digesters for pulp cooking.

The lime mud from the white liquor pressure filtering unit is transferred to the lime mud pressure filter for further washing. The lime mud is transferred to the lime mud surge tank, which will feed the two lime mud precoat filters. Lime mud from water treatment will also feed the surge tank. A third pressure filter will be used exclusively as a stand-by unit for either the white liquor pressure filter or the lime mud pressure filter.

The lime mud from the surge tank will feed the two mud precoat filters. The lime mud cake discharged from the filters is fed into the calcining unit, the lime kiln. Here, carbon dioxide is driven off and calcium carbonate is converted to calcium oxide (quick-lime). The returned lime is transferred to two causticizing lime storage bins, which will feed the two lime slakers and the two water treatment lime storage bins.

Calcium is lost with exit gases from the lime kiln, with grits at the two lime slakers, and in the form of calcium carbonate in the clarified white liquor. This lost material is made up by receiving purchased lime by trucks and railway. The two causticizing lime storage bins and the two water treatment lime storage bins will be capable of receiving purchased lime from both trucks and railway.

o Controls

Particulate matter (PM) emissions and visible emissions (VE) from the No. 4 Lime Kiln will be controlled using an electrostatic precipitator (ESP) system. All PM collected will be recycled dry back into the lime kiln. The ESP will vent into the atmosphere. The ESP will not control the emissions of TRS (total reduced sulfur), SO₂ (sulfur dioxide), CO (carbon monoxide), NO_x (nitrogen oxides), and VOC (volatile organic compounds). The lime kiln is also a source of fugitive PM emissions.

The dregs filters (2) that support the green liquor clarifiers are sources of fugitive TRS emissions.

The two lime slakers will be controlled with a condensing scrubber system. The condensing scrubber will vent to the atmosphere and will be a source of PM emissions and VE.

The white liquor and lime mud pressure filters are vented into the atmosphere and are sources of TRS emissions.

The lime mud precoat filters (2) are fugitive TRS emissions sources.

The two causticizing lime storage bins and the two water treatment lime storage bins are sources of PM emissions and VE and each will be controlled with a baghouse system.

All material transfer systems will be totally enclosed. Emissions of PM due to construction activity will be minimized with the use of various control measures.

II. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 17-2 and 17-4.

The application package for the lime kiln (AC 62-107858) was designated complete on September 10, 1985, and for the associated causticizing system (AC 62-107857), August 6, 1985.

The existing facility is located in an area designated attainment for all criteria pollutants.

The existing mill is a major emitting facility in accordance with FAC Rule 17-2.100(98) for the pollutants particulate matter (PM), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), total reduced sulfur (TRS), and volatile organic compounds (VOC).

The following table will exhibit the previous contemporaneous pollutant emissions changes:

Table 1

Source	Net Pollutant Emissions Charges (TPY)				
	SO ₂	NO _x	CO	TRS	VOC
No. 1 Bark Boiler (8/17/83)			35.0		14.2
No. 4 Recovery Boiler (8/22/83)	1.2	23.7	23.9	1.0	9.5
No. 2 Bark Boiler (9/12/83)	3.5		26.3		11.5
Total	4.7	23.7	85.2	1.0	35.2

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

Table 2

Source	Maximum Potential Pollutant Emissions (TPY)					
	PM	SO ₂	NOx	CO	TRS	VOC
Lime Kiln No. 4	246.16	85.4	416.3	355.9	14.37	41.5
Lime Slakers (2)	9.13					
Lime Mud Pressure Filter					0.07	
White Liquor Pressure Filter					0.08	
Causticizing Lime Bins (2)	1.50					
Water Treatment Lime Bins (2)	0.45					
"Fugitive Emissions" No. 4 Lime Kiln Leaks	5.28					
Lime Mud Precoat Filters (2)					1.96	
Dregs Filters (2)					1.44	
Total:	262.52	85.4	416.3	355.9	17.92	41.5

Note: Based on a 650 TPD lime product kiln (No. 4).

The following table will exhibit the reduction in actual pollutant emissions expected from the retirement of some existing stationary sources:

Table 3

Source	Actual Pollutant Emissions (TPY)					
	PM	SO ₂	NOx	CO	TRS	VOC
Lime kilns Nos. 1, 2, 3 and Calciner	204.2	52.0	417.8	2618.5	23.4	114.4
Lime Slakers	11.66					
Causticizing Lime Bins	6.91					
Water Treatment Lime Bins	0.16					
Lime Mud Centrifuges, Belt & Precoat Filters					1.75	
Dregs Filter					1.33	
"Fugitive Emissions" Nos. 1, 2 & 3 Lime kilns	16.60					
Total:	239.53	52.0	417.8	2618.5	26.48	114.4

Note: Based on 784 TPD lime product kiln activity.

The following table will reflect the net pollutant emissions from the mill's contemporaneous pollutant emissions increases (Table 1), the proposed modification (Table 2), and the retirement of existing stationary sources (Table 3):

	PM	SO ₂	NOx	CO	TRS	VOC
Table 1	0	4.7	23.7	85.2	1.0	35.2
Table 2	262.52	85.4	416.3	355.9	17.92	41.5
Table 3	-239.53	-52.0	-417.8	-2618.5	-26.48	-114.4
Net:	22.99	38.1	22.2	-2177.4	-4.48	-37.7

Since there are no significant net emissions increase of a pollutant pursuant to Table 500-2 for the proposed modification, the pollutants are not subject to PSD (prevention of significant deterioration) review pursuant to FAC Rule 17-2.500. Therefore, the pollutant emissions are subject to review pursuant to FAC Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Requirements.

The proposed modification shall be subject to FAC Rules 17-2.210, 17-2.220, 17-2.240, 17-2.250, 17-2.610(2) and (3), 17-2.620(2), 17-2.700, and 17-2.710. Pursuant to FAC Rule 17-2.660, the New Source Performance Standards (NSPS) for Kraft Pulp Mills, 40 CFR 60.280, Subpart BB is adopted by reference, of which the proposed new No. 4 Lime Kiln is subject.

In accordance with FAC Rule 17-2.210, the proposed project is required to obtain the proper permits from the department. Before any construction permit from the department can be issued to any source of air pollution, the department shall provide an opportunity for public comment on the notice of proposed agency action pursuant to FAC Rule 17-2.220.

The proposed project is subject to the provision of FAC Rule 17-2.240, Circumvention, and FAC Rule 17-2.250, Excess Emissions.

Since there is not a visible emissions (VE) standard for a lime kiln pursuant to 40 CFR 60.282, the No. 4 Lime Kiln, whose VE are controlled with an ESP system, shall be subject to the provisions of FAC Rule 17-2.610 (2), General Visible Emissions Standard. The lime slakers (2), whose VE are controlled with a scrubber system, are also subject to the provisions of this rule. Compliance tests shall be performed using DER Method 9 pursuant to the FAC Rule 17-2.700.

Because there is not a specific source PM emission limiting standard for a lime slaker, the applicant proposed a limit of 2.03 lb/hr (9.13 TPY), which is acceptable to the department. The department will require PM mass emissions compliance test, using EPA Methods 1, 2, 3, and 5, in accordance with 40 CFR 60, Appendix A, and FAC Rule 17-2.700.

The causticizing lime storage bins (2) and the water treatment lime storage bins (2) will each have a baghouse system to control both PM emissions and VE. The projected potential PM emissions of the causticizing lime storage bins are 0.34 lb/hr and 1.50 TPY. The projected PM emissions of the water treatment lime storage bins are 0.10 lb/hr and 0.45 TPY. Operational activity is such that these sources are subject to FAC Rule 17-2.610(3), Unconfined Emissions of PM. The use of a baghouse system is considered to be reasonable control for this type of operational activity. Therefore, the department will only impose a VE standard of no visible emissions (5% opacity). Compliance testing shall be performed using DER Method 9 in accordance with FAC Rule 17-2.700. Failure to comply with the VE standard will necessitate the requirement to perform a PM mass emissions test(s) using EPA Methods 1, 2, 3, and 5, in accordance with 40 CFR 60, Appendix A, and FAC Rule 17-2.700.

The applicant requested and based the PM potential emissions of the lime storage bins(4) on a PM mass emission rate of 0.02 gr/dscf, which is the vendor's specifications of the control systems. The department finds the PM emission rate to be acceptable. However, if a PM mass emissions test is required due to a failure to comply with the VE standard and the applicant cannot achieve the PM emission rate of 0.02 gr/dscf, the potential PM emissions from these sources will have to be recalculated and reviewed pursuant to FAC Rule 17-2.500, PSD.

The New Source Performance Standard (NSPS), 40 CFR 60, Subpart BB, Kraft Pulp Mills, was adopted by reference in accordance with FAC Rule 17-2.660 (2)(a). The proposed lime kiln is subject to the provisions of this NSPS.

In accordance with 40 CFR 60.282(a)(3), no owner or operator shall cause to be discharged into the atmosphere from any lime kiln any gases which contain PM in excess of 0.15 g/dscm (0.067 gr/dscf) corrected to 10% oxygen, when gaseous fossil fuel fuel is burned. However, to avoid full PSD review, the applicant requests to be restricted to a PM mass emission rate of 0.21 g/dscm (0.091 gr/dscf) corrected to 10% oxygen, when liquid fossil fuel is burned.

In accordance with 40 CFR 60.282(a)(3), no owner or operator shall cause to be discharged into the atmosphere from any lime kiln any gases which contain TRS in excess of 8 ppm by volume on a dry basis, corrected to 10% oxygen.

For the proposed lime kiln, the monitoring of emissions and operations shall be in accordance with 40 CFR 60.284 and FAC Rule 17-2.710. The test methods and procedures shall be in accordance with 40 CFR 60.285 and FAC Rule 17-2.700.

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.

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

A meter shall be installed to measure the scrubbing liquid supply pressure on the lime slaker scrubber system 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.

A fuel flow meter shall be installed on each fuel line (i.e., No. 6 Fuel Oil, natural gas, etc.) to the No. 4 Lime Kiln.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

The regulated pollutant emissions from the proposed modification are visible emissions (VE), particulate matter (PM), sulfur dioxide (SO₂), and total reduced sulfur (TRS). The following table will reflect the maximum allowable emissions standards and limits applicable to the proposed modification:

Table 5

Source	Pollutant	Maximum Allowable Emissions Standards/Limit
No. 4 Lime Kiln	PM	Not to exceed 0.15 g/dscm (0.067 gr/dscf) corrected to 10% oxygen, when gaseous fossil fuel is burned (44.7 lb/hr, 195.8 TPY)
		Not to exceed 0.21 g/dscm (0.091 gr/dscf) corrected to 10% oxygen, when liquid fossil fuel is burned (56.2 lb/hr, 246.2 TPY)
	VE	Not to exhibit 20% opacity or greater
	TRS	Not to exceed 8 ppm by volume on a dry basis, corrected to 10% oxygen; (while on gaseous fossil fuel: 3.28 lb/hr, 14.37 TPY; while on liquid fossil fuel: 3.04 lb/hr, 13.31 TPY).
Causticizing Lime Silos	SO ₂	Sulfur content of the liquid fossil fuel is not to exceed 2.50%, by weight; Not to exceed 20.1 lb/hr and 85.4 TPY
	VE	Not to exhibit any VE (5% opacity)
Water Treatment Lime Silos	VE	Not to exhibit any VE (5% opacity)
Lime Slakers	PM	Not to exceed 2.03 lb/hr and 9.16 TPY
	VE	Not to exhibit 20% opacity or greater

The emission limiting standards and limits are consistent with the applicable requirements pursuant to FAC Rules 17-2 and 17-4 and the NSPS, 40 CFR 60, Subpart BB, which is adopted by reference pursuant to FAC Rule 17-2.660.

B. Air Quality Analysis

From a technical review of the application package and its amendments, the department has determined that the proposed modification does not require an air quality analysis.

IV. Conclusion

The allowable pollutant emissions 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 all applicable requirements of FAC Rules 17-2 and 17-4 and the NSPS, 40 CFR 60, Subpart BB, Appendix A, and Appendix B.

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 dismantled. 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.

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 62-107858
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.

Permit Number: AC 62-107858
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. 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.

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

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). EPA Method 16A may only be used if prior approval is requested and received pursuant to the provisions of FAC Rule 17-2.700(3).

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 8.33 lb/hr and 36.5 TPY. Compliance test method shall be EPA Method 6 pursuant to Rule 17-2.700(6)(a)6.

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. EPA Method 16A shall not be used to perform the performance evaluation unless prior approval is requested and received pursuant to FAC Rule 17-2.700(3).

PERMITTEE:
The Buckeye Cellulose Corp.

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

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 a per month and 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 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.

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 pollutant emission 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 a per month 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.

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

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 _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

ATTACHMENT 1

Available Upon Request.

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

August 1, 1985

Mr. Steve Smallwood
Chief, B.A.Q.M.
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

Re: Causticizing Modernization
Construction Permit Application
Foley Plant
The Buckeye Cellulose Corporation

Dear Mr. Smallwood:

Enclosed are four (4) copies each of two (2) applications to construct air pollution sources at the Foley Plant. One application is to replace four (4) existing lime reburning units with one (1) new lime kiln. The other is to replace or improve associated existing process equipment (i.e., lime slakers, lime bins, and lime washers). Also enclosed is a check for \$1,500 to cover the fee for filing.

Basically, this modernization project consists of replacing four existing obsolete lime burning units with one large new energy efficient state-of-the-art lime kiln and associated auxiliary equipment.

This new lime kiln will result in about a 30% reduction in fuel usage. This reduction in fuel burned will reduce pollutants produced, which is an appreciable benefit to the environment. Furthermore, this kiln, which is the largest in the kraft pulp industry in North America, is designed for maximum combustion efficiency. Therefore, the pollutant products from incomplete combustion (CO and VOC) also will be significantly reduced. It is expected that there will be a 10% reduction in particulate. This reduction is not shown in the permit application because the application is based on burning 100% fuel oil. In actual practice we expect to burn much less fuel oil. There will be a small increase in SO₂ but this slight increase will not trigger the PSD procedures.

This new kiln compared to the existing four units will discharge flue gases which contain 89% less TRS (odor), 86% less CO, 64% less VOC, and virtually the same NO_x.

It is noteworthy that compliance with the recently promulgated TRS regulations will be accomplished much sooner than required by these regulations. Also, the degree of reduction is much greater with our new equipment meeting NSPS limits as compared to limits for existing systems.

1296H

Mr. Steve Smallwood
August 1, 1985
Page 2

The above significant emission reductions are achieved despite the fact that our application is based on 650 tons of lime per day produced versus actual production in 1983/84 of 511.

The information included in the applications is based on a comprehensive review of the forms with BAQM/CAPS staff. We appreciate the effort and cooperation from Messrs. Fancy, Harley, Mitchell, and Thomas in developing the details required to meet the test of "completeness". Our task was made much easier by this discussion and we believe the task of review also will benefit significantly.

All of the sensitive information for which confidential treatment is appropriate has been collected in Attachment G. In accordance with Florida laws, including 403-111 of the Florida Pollution Control Acts, confidential treatment of this section is requested.

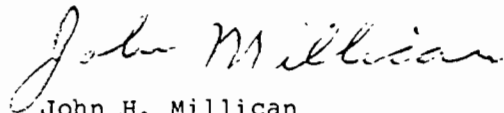
We are confident that the new causticizing system's performance will meet or exceed best demonstrated technology (BDT) and will result in a major improvement in work place environment.

The information is believed to be complete. Funding of the project and beginning of construction are awaiting approval of the permit. Early completion of the project will bring significant benefits to the Department, the local community, the environment, and to Buckeye. Therefore, we respectfully request expeditious processing and will respond promptly to requests for clarification. Please call me at (904) 584-0347 for any comments or additional information.

We have learned to rely on DER staff for advice, counsel and cooperation. Their assistance and support is extremely valuable and is appreciated very much.

Very truly yours,

THE BUCKEYE CELLULOSE CORPORATION



John H. Millican
Environmental Control Manager

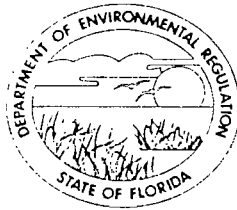
JHM/eph
1296H

Attachments

ATTACHMENT 2

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

August 27, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. E. Wertheimer
Plant Manager
The Buckeye Cellulose Corporation
Route 3, Box 260
Perry, Florida 32347

Dear Mr. Wertheimer:

Re: Completeness Review for the Application to Construct with
Permit No. AC 62-107858

The department is in receipt of the above referenced application to construct an air pollution source, the No. 4 Lime Kiln (facility ID) with an associated ESP (electrostatic precipitator). The referenced application package has been reviewed and deemed incomplete. Therefore, the following information will have to be submitted to the department, including all assumptions, calculations and reference documents, before the status of your application can be ascertained:

- o Due to acid mist formation below a certain temperature, known as the acid dew point, and to avoid acid corrosion of the ESP during that formation, what are the mill's contingency plans to deal with all pollutant emissions during start-up and shut-downs and malfunctions having a drop in temperatures below the acid dew point?
- o Referencing the first request, how often will the proposed lime kiln be down for scheduled maintenance on an annual basis?
- o Referencing the first request, if another control system will be utilized during start-ups, shut-downs and malfunctions, quantify the pollutant emissions expected.
- o How long will it take the proposed lime kiln to attain a temperature level just above the acid dew point temperature?

Mr. C. E. Wertheimer
Page Two
August 27, 1985

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 cursive script, appearing to read "C. H. Fancy".

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

CHF/BM/s

cc: John C. Brown, Jr.
David A. Buff
John H. Millican

ATTACHMENT 3

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

DER

SEP 10 1985

BAQM

September 9, 1985

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

Dear Mr. Fancy:

Re: Completeness Review for the Application to Construct
with Permit No. AC62-107858)

The purpose of this letter is to respond to your letter to Mr. C. E. Wertheimer of August 27, 1985 requesting additional information for the referenced application. It is extremely gratifying that the completeness review has developed only this one request for additional information. The pre-application discussions in your office certainly have resulted in the mutual benefit we were seeking. The extra effort from you and your staff has paid off. We appreciate this very much.

Attached is a concise contingency plan for operations during periods of startup, shutdown, and malfunction. It has been developed to address the points in your letter based on clarifying comments from Mr. Bruce Mitchel by phone on 9/3/85.

Brief comments referenced to the four specific points included in your letter are as follows:

- o Empirical information developed by Crown-Zellerbach and Longview Fiber supports the conclusion that acid mist formation is not a factor in a lime kiln precipitator. C.Z. have operated for seven years at a temperature range of 430-480°F. Their inspections have identified no evidence of corrosion. Longview Fibre have operated 3.5 years at 270-320°F. Their inspections initially included plate thickness measurements. However, plate thickness measurements have been discontinued because there has been no measurable corrosion. At Longview, the only unscheduled outage was caused by a motor which had been wired in wrong so that the drive turned in the wrong direction. This documents excellent reliability of the system.
- o Mr. D. B. (Dennis) Dalziel, Process Engineer, Crown-Zellerbach, Canada, Elk Falls Mill, Vancouver Island, British Columbia, (605) 287-7411, supplied the C.Z. information. Mr. Lyle Turley, Pulp Mill Maintenance Superintendent, and Mr. Don Johnson, Plant Engineer (206) 425-1550, Longview Fibre, provided the information from Longview.

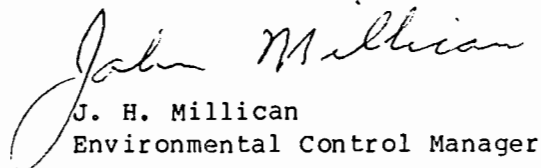
- o One cold outage for maintenance will be scheduled annually. Process safety checks will be performed bi-weekly. These checks will require about four hours during which the mud feed will be discontinued and the precipitator will remain energized.
- o There are no plans for any bypass, therefore, no secondary emissions control will be required. All exhaust gas will pass through the precipitator and the precipitator will be energized (except for about two hours on startup from cold shutdown) as detailed in the contingency plan.
- o Available information supports the conclusion that the chemistry in the precipitator would prevent the formation of acid mist because of the presence of lime. This means that temperature is not the critical factor. Any mist formed even when burning fuel oil would be neutralized by the lime. Experience at C.Z. and Longview support this conclusion. The time when the acid mist dew point temperature would be exceeded is not known. However, available information indicates that this is not a significant factor.

In summary, we have enough confidence that corrosion is not a significant factor to invest major capital in the installation. Also, the plan we have developed provides assurance that emissions will be controlled.

The information you requested has been developed and supplied as completely as can reasonably be accomplished. We believe it should be satisfactory for your purpose. If you require clarification, please call me at (904) 584-0347.

Very truly yours,

THE BUCKEYE CELLULOSE CORPORATION


J. H. Millican
Environmental Control Manager

JHM/eph
1431H

Attachment

LIME KILN/PRECIPIPARATOR
CONTINGENCY PLAN

The purpose of this plan is to assure emission control during shutdown, startup, and malfunction. Details are as follows:

When the precipitator is not energized mud feed to the kiln will be discontinued.

There will be no provision for a bypass stack and all kiln exhaust gas will discharge to the precipitator.

When the kiln is shut down, the precipitator will remain energized until lime discharge from the kiln has ceased.

Startup from cold shutdown will occur with an empty kiln and a clean precipitator. This is the most likely condition for mist formation. To minimize this risk, startup will be with natural gas if possible. All exhaust gas will discharge into the precipitator. The first field will be energized when the precipitator inlet temperature is 300°F or high enough to prevent arcing (estimated at about two hours after the kiln is ignited). The second and third fields will be energized when the precipitator exit temperature has reached 300°F or about four hours after the kiln is ignited. Mud feed to the kiln will not be started until after all of the precipitator is energized.

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.

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 a per month 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 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.

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. 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).

9. The water treatment lime storage bins shall demonstrate compliance with the permitted emissions 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).

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 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)1.c.i.

14. 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.

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 ± 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 _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

ATTACHMENT 1

Available Upon Request.

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

August 1, 1985

Mr. Steve Smallwood
Chief, B.A.Q.M.
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

DER

AUG 6 1985

BAQM

Re: Causticizing Modernization
Construction Permit Application
Foley Plant
The Buckeye Cellulose Corporation

Dear Mr. Smallwood:

Enclosed are four (4) copies each of two (2) applications to construct air pollution sources at the Foley Plant. One application is to replace four (4) existing lime reburning units with one (1) new lime kiln. The other is to replace or improve associated existing process equipment (i.e., lime slakers, lime bins, and lime washers). Also enclosed is a check for \$1,500 to cover the fee for filing.

Basically, this modernization project consists of replacing four existing obsolete lime burning units with one large new energy efficient state-of-the-art lime kiln and associated auxiliary equipment.

This new lime kiln will result in about a 30% reduction in fuel usage. This reduction in fuel burned will reduce pollutants produced, which is an appreciable benefit to the environment. Furthermore, this kiln, which is the largest in the kraft pulp industry in North America, is designed for maximum combustion efficiency. Therefore, the pollutant products from incomplete combustion (CO and VOC) also will be significantly reduced. It is expected that there will be a 10% reduction in particulate. This reduction is not shown in the permit application because the application is based on burning 100% fuel oil. In actual practice we expect to burn much less fuel oil. There will be a small increase in SO₂ but this slight increase will not trigger the PSD procedures.

This new kiln compared to the existing four units will discharge flue gases which contain 89% less TRS (odor), 86% less CO, 64% less VOC, and virtually the same NO_x.

It is noteworthy that compliance with the recently promulgated TRS regulations will be accomplished much sooner than required by these regulations. Also, the degree of reduction is much greater with our new equipment meeting NSPS limits as compared to limits for existing systems.

1296H

Mr. Steve Smallwood

August 1, 1985

Page 2

The above significant emission reductions are achieved despite the fact that our application is based on 650 tons of lime per day produced versus actual production in 1983/84 of 511.

The information included in the applications is based on a comprehensive review of the forms with BAQM/CAPS staff. We appreciate the effort and cooperation from Messrs. Fancy, Harley, Mitchell, and Thomas in developing the details required to meet the test of "completeness". Our task was made much easier by this discussion and we believe the task of review also will benefit significantly.

All of the sensitive information for which confidential treatment is appropriate has been collected in Attachment G. In accordance with Florida laws, including 403-111 of the Florida Pollution Control Acts, confidential treatment of this section is requested.

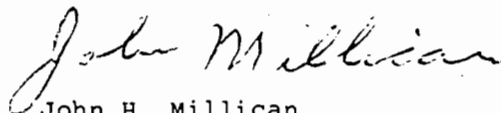
We are confident that the new causticizing system's performance will meet or exceed best demonstrated technology (BDT) and will result in a major improvement in work place environment.

The information is believed to be complete. Funding of the project and beginning of construction are awaiting approval of the permit. Early completion of the project will bring significant benefits to the Department, the local community, the environment, and to Buckeye. Therefore, we respectfully request expeditious processing and will respond promptly to requests for clarification. Please call me at (904) 584-0347 for any comments or additional information.

We have learned to rely on DER staff for advice, counsel and cooperation. Their assistance and support is extremely valuable and is appreciated very much.

Very truly yours,

THE BUCKEYE CELLULOSE CORPORATION



John H. Millican
Environmental Control Manager

JHM/eph
1296H

Attachments