

SENDER:

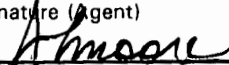
- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested"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

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

1: Addressee's Address

2: Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to: Mr. C.S. Aiken, Plant Mgr. The Procter & Gamble Cellulose Co. Rt 3 Box 260 Perry, IA 32347	4a. Article Number P 832 538 967 4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise 7. Date of Delivery 10/11/91
5. Signature (Addressee)	8. Addressee's Address (Only if requested and fee is paid)
6. Signature (Agent) 	

PS Form 3811, October 1990

☆U.S. GPO: 1990-273-861

DOMESTIC RETURN RECEIPT

P 832 538 967



Certified Mail Receipt

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

Sent to		C.S. Aiken
Street & No.		Procter & Gamble
P.O., State & ZIP Code		Perry, IA
Postage		\$
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Address of Delivery		
TOTAL Postage & Fees		\$
Postmark or Date	9/30/91 AC 62-197417	

PS Form 3800, June 1990

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DER File No. AC 62-197417
Taylor County

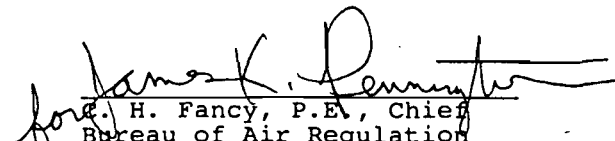
Mr. C. S. Aiken, Plant Manager
The Procter & Gamble Cellulose Company
Rt. 3, Box 260
Perry, Florida 32347

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

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


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

CERTIFICATE OF SERVICE

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

Clerk Stamp

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


(Clerk) 9/30/91
(Date)

Copies furnished to:
A. Kutyna, NED
A. M. Kinghorn, P.E., SEC

Final Determination

The Procter & Gamble Cellulose Company
Taylor County
Perry, Florida

Construction Permit No.
AC 62-197417

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

September 19, 1991

Final Determination

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

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



PROCTER & GAMBLE
CELLULOSE

THE PROCTER & GAMBLE CELLULOSE COMPANY
P.O. BOX 260
PERRY, FLORIDA 32347-9500
PHONE (904) 584-0121

RECEIVED

SEP 5 1991

Division of Air
Resources Management

August 30, 1991

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

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

Dear Mr. Andrews:

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

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

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

Very Truly Yours,

The Procter & Gamble Cellulose Co.

Clifford Henry
Clifford Henry
Environmental Control Manager

cc: B. Mitchell
A. Kutyma, DE List



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

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

Permit Number: AC 62-197417
Expiration Date: May 31, 1993
County: Bay
Latitude/Longitude: 30°03'59"N
83°33'12"W
Project: Sidestream Pulping Process Modification

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

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

The Standard Industrial Codes are: 2611-Pulp Mill.

The Standard Classification Codes are:

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

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

Attachments to be Incorporated:

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

PERMITTEE:
TP&GCC

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
TP&GCC

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

GENERAL CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:
TP&GCC

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

GENERAL CONDITIONS:

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

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

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

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and,
 - the results of such analyses.

PERMITTEE:
TP&GCC

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

GENERAL CONDITIONS:

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

SPECIFIC CONDITIONS:

1. The sidestream pulping process may operate continuously (i.e., 8760 hrs/yr).
2. The maximum product rate is 2296 lbs/hr of pulp.
3. The sidestream pulping process is subject to the provisions of F.A.C. Rules 17-4.130: Plant Operation-Problems; 17-2.240: Circumvention; and, 17-2.250: Excess Emissions.
4. The sidestream pulping process shall be in compliance with all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and Title 40 of the CFR (July, 1990 version).
5. The sidestream pulping process shall not exceed the following pollutant emission standards/limitations:

Source	Pollutant	Standard/Limitation
o S1	PM	0.65 lb/hr; 2.85 TPY
	PM10	0.26 lb/hr; 1.14 TPY
	VE	less than 20% opacity
o S2	PM	0.48 lb/hr; 2.10 TPY
	PM ₁₀	0.19 lb/hr; 0.83 TPY
	VE	less than 20% opacity
o S3	PM	0.70 lb/hr; 3.07 TPY
	PM ₁₀	0.28 lb/hr; 1.23 TPY
	VE	less than 20% opacity

Note: 1) Volumetric flow rates are:

- o S1 7150 acfm
 - o S2 5300 acfm
 - o S3 4420 acfm
- 2) Allowable emission rates include a 20% margin of safety above the vendor's specifications.
 - 3) PM₁₀ emissions @ 40% of PM emissions (test data).

PERMITTEE:
TP&GCC

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

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

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

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

PERMITTEE:
TP&CC

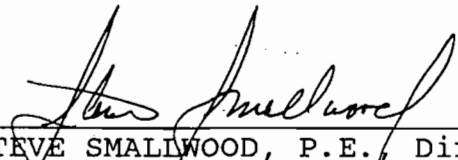
Permit Number: AC 62-197417
Expiration Date: May 31, 1993

SPECIFIC CONDITIONS:

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

Issued this 27th day
of September, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Steve Smallwood

FROM: Clair Fancy *CF*

DATE: September 18, 1991

SUBJ: Approval of Construction Permit No. AC 62-197417
The Procter & Gamble Cellulose Company

Attached for your approval and signature is a construction permit for a modification prepared by the Bureau of Air Regulation for the above referenced company to install equipment, as a sidestream project, to process pulp, which will not increase plant capacities, water usage, or effluent flow. The facility is located in Perry, Taylor County, Florida. There were no comments received during the public notice period.

Day 90, after which this permit will be issued by default, is October 12, 1991.

I recommend your approval and signature.

CF/BM/rbm

CHF-

page 1 of 7

SC # 4

SC # 14

40CFR "what"

same question

change "must"

to "shall"

[Signature]

9-27-91

SENDER:

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

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

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. C.S. Aiken, Plant Mgr.
 The Procter & Gamble Cellul. Co.
 Rt 3 Box 260
 Perry, FL 32347

4a. Article Number
 P 617 884 186

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

7. Date of Delivery
 11-4-91

5. Signature (Addressee)

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

6. Signature (Agent)
Amos

PS Form 3811, October 1990

U.S. GPO: 1990-273-861

DOMESTIC RETURN RECEIPT

P 617 884 186

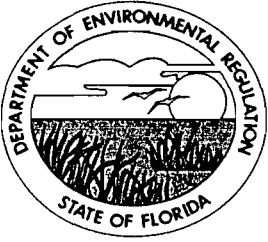


Certified Mail Receipt

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

Sent to <i>C.S. Aiken</i>	
Street & No. <i>Procter & Gamble</i>	
P.O., State & ZIP Code <i>Perry, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date <i>11-1-91</i> <i>AC 62-197417</i>	

PS Form 3800, June 1990



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

November 1, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Aiken:

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

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

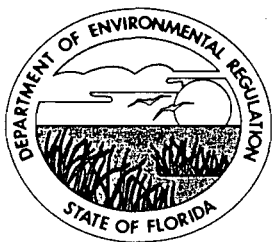
If there are any questions, please call Mr. Bruce Mitchell at (904) 488-1344 or write to me at the above address.

Sincerely,

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

CHF/BM/rbm

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



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

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

Permit Number: AC 62-197417

Expiration Date: May 31, 1993

County: Taylor

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

Project: Sidestream Pulping Process
Modification

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

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

The Standard Industrial Codes are: 2611-Pulp Mill.

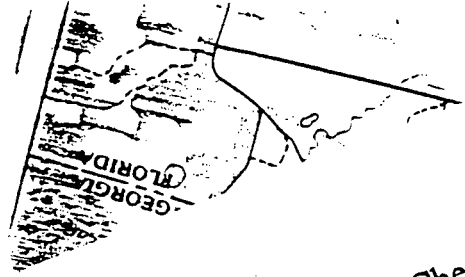
The Standard Classification Codes are:

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

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

Attachments to be Incorporated:

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



Check Sheet

Company Name: _____
Permit Number: _____
PSD Number: _____
Permit Engineer: _____

Procter & Gamble Cellulose
AC 62-197417

Cross References:

-
-
-

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT or LAER Determination
- Unsigned Permit

Correspondence with:

- EPA
- Park Services
- Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)
- Waiver of Department Action
- Other

Final

Determination:

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 31, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bruce Harding
Environmental Control Manager
Buckeye Florida, Limited Partnership
Route 3, Box 260
Perry, Florida 32347

Dear Mr. Harding:

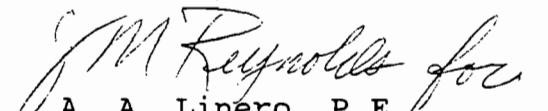
Re: Extension of Permit Nos. AC62-197417, Pulping Sidestream and
AC62-172092, No. 2 Bleach Plant

This letter serves as the Department's intent to extend the referenced construction permits which expire today. We had previously indicated by our letter of August 30 that we would rely on an expected automatic extension by rule of current construction permits. Buckeye Florida (aka Buckeye Cellulose) does not wish to rely on a rule which has not yet been promulgated and wishes to have the Department act on the matter expeditiously.

It is the Department's intent to extend the permits until January 31, 1996, after which the referenced units can continue to operate following submittal of the facility Title V permit, issuance of an operating permit, or extension of the construction permit by the anticipated rule. We expect to send Buckeye Florida the requested permit extension by September 8.

Please keep the Northwest District informed of the status of the projects and their compliance with permit conditions and rules. If you have any questions please call me at (904)488-1344.

Sincerely,


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

AAL/aal/l

cc: C. Kirts, NED

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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

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

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

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Bruce Harding
 Environmental Control Manager
 Buckeye Florida, Limited Partnership
 Route 3, Box 260
 Perry, Florida 32347

4a. Article Number
 Z 392 979 034

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

7. Date of Delivery
 8-31-95

5. Signature (Addressee)

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

6. Signature (Agent)
A Moore

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

Thank you for using Return Receipt Service.

Z 392 979 034



Receipt for Certified Mail

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

PS Form 3811, March 1993

Recipient Name: *Bruce Harding*
 Address: *Rt 3 Box 260*
 City and State: *Perry, FL 32347*

Postage & Fees: *S*

Postmark or Date: *8/30/95*
ACC02-197417
ACC02-192092

37402687x.doc



file

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 30, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bruce Harding
Environmental Control Manager
Buckeye Florida, Limited Partnership
Route 3, Box 260
Perry, Florida 32347

Dear Mr. Harding

Re: Extension of Permit Nos AC 62-197417, Pulping Sidestream, and AC62-172092, No. 2 Bleach Plant.

On August 15 the Department received your application letter, dated August 10, requesting an extension of the expiration date of the above referenced permits. The attached proposed rule language will, if adopted, extend the air construction permits by law. It is anticipated that the rule will be adopted in early September. If the rule is adopted within 90 days of receipt of your application, the Department will not be required to respond further. However, we will inform you upon adoption of the proposed rule.

If the rule, for any reason, is not adopted within 90 days of receipt of your application we will act upon your request in a timely manner. Please note that your air construction permits are valid until the Department acts upon your request.

Should you have any questions please contact me at (904) 488-1344.

Sincerely,

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

AAL/kw

Attachment

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

NOTICE OF CHANGE IN PROPOSED RULE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DOCKET NO: 95-38R

CHAPTER TITLE:

CHAPTER NO.:

Operation Permits for Major Sources of Air

Pollution

62-213

RULE TITLE:

RULE NO.:

Permit Applications

62-213.420

The Department has made a change to the proposed rule which appeared in the Florida Administrative Weekly, Volume 21, Number 30, dated July 28, 1995, page 4958, so that the following section(s) will read as set forth below:

62-213.420 Permit Applications

(1)(a)1.a. Acid Rain Sources will submit applications for the entire source by June 15, 1996 ~~January 1, 1996~~. The Acid Rain Part of each such application, however, shall be submitted no later than January 1, 1996.

b.(ii) June 15, 1996 ~~February 1, 1996~~, otherwise.

c. All other sources subject to the permitting requirements of this chapter will submit applications by June 15, 1996 ~~February 1, 1996~~.

2. Except as provided at Rule 62-213.420(1)(a)4., F.A.C., ~~except for sources that are subject to the Florida Electrical Power Plant Siting Act (FEPPSA),~~ a source that commences operation after January 1, 1996, must file an application for an operation permit under this chapter ninety days before expiration of the source's construction permit, but no later than 180 days after commencing operation. Except as provided at Rule 62-213.420(1)(a)4., F.A.C., ~~a~~ source that has applied for an Electrical Power Plant Siting Certification prior to January 1, 1996, but has not but has not been issued the certification as of that date, or a source that has been issued an Electrical Power Plant Siting Certification prior to January 1, 1996, but has not commenced operation by that date, shall file an application for an operation permit under this ~~chapter~~ no later than 180 days after commencing operation. Sources subject to the FEPPSA that apply for Electrical Power Plant Siting Certification subsequent to January 1, 1996, may, at their option, shall apply for a permit under the provisions of this chapter at the same time the Florida Power Plant Siting Certification application is submitted.

4. The expiration dates of all air construction permits for Title V sources that expire between September 1, 1995, and November 1, 1996 ~~September 1, 1996~~, are hereby extended to the later of November 1, 1996, or 240 days after commencing operation ~~September 1, 1996~~. Facilities with such air construction permits which have not commenced operation on January 1, 1996, shall apply

for a permit under the provisions of this chapter on the later of
September 1, 1996, or 180 days after commencing operation.

Specific Authority: 403.061, 403.087, F.S.

Law Implemented: 403.061, 403.0872, F.S.

History: New 11-28-93; Amended 4-62-94; Formerly 17-213.420;
Amended 11-23-94, 4-2-95,_____.

NAME OF PERSON ORIGINATING PROPOSED RULE: Howard L. Rhodes,
Director, Division of Air Resources Management

NAME OF SUPERVISOR OR PERSON WHO APPROVED THE PROPOSED RULE:
Virginia B. Wetherell, Secretary

DATE PROPOSED RULE APPROVED: July 17, 1995

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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

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

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

Consult postmaster for fee.

3. Article Addressed to:
 Bruce Harding, EC M
 Buckeye Fla., Ltd Partnership
 Route 3, Box 260
 Perry, FL 32347

4a. Article Number
 Z 392 979 038

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

7. Date of Delivery
 9/5/95

5. Signature (Addressee)

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

6. Signature (Agent)

Thank you for using Return Receipt Service.

Z 392 979 038



Receipt for Certified Mail

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

PS Form 3800, March 1993

Sent to Bruce Harding	
Street and No. Buckeye Fla	
P.O. State and ZIP Code Perry FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 9-5-95 AC62-197417 AC62-172092	



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 31, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bruce Harding
Environmental Control Manager
Buckeye Florida, Limited Partnership
Route 3, Box 260
Perry, Florida 32347

Dear Mr. Harding:

Re: Extension of Permit Nos. AC62-197417, Pulping Sidestream and
AC62-172092, No. 2 Bleach Plant

This letter serves as the Department's intent to extend the referenced construction permits which expire today. We had previously indicated by our letter of August 30 that we would rely on an expected automatic extension by rule of current construction permits. Buckeye Florida (aka Buckeye Cellulose) does not wish to rely on a rule which has not yet been promulgated and wishes to have the Department act on the matter expeditiously.

It is the Department's intent to extend the permits until January 31, 1996, after which the referenced units can continue to operate following submittal of the facility Title V permit, issuance of an operating permit, or extension of the construction permit by the anticipated rule. We expect to send Buckeye Florida the requested permit extension by September 8.

Please keep the Northwest District informed of the status of the projects and their compliance with permit conditions and rules. If you have any questions please call me at (904)488-1344.

Sincerely,

J. M. Reynolds for
A. A. Linero, P.E.
Administrator,
New Source Review Section

AAL/aal/1

cc: C. Kirts, NED

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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

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

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Bruce Harding
 Environmental Control Manager
 Buckeye Florida
 Route 3 Box 260
 Perry, Florida 32347

4a. Article Number
 Z127 632 547

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

7. Date of Delivery
 10-23-95

5. Signature (Addressee)

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

6. Signature (Agent)

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

Thank you for using Return Receipt Service.

Z 127 632 547



Receipt for Certified Mail

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

Mr. Bruce Harding
 Environmental Control Manager
 Buckeye Florida
 Route 3 Box 260
 Perry, Florida 32347

PS Form 3800, March 1991

Rule Change (extension)
AC62-197417



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 20, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bruce Harding
Environmental Control Manager
Buckeye Florida
Route 3, Box 260
Perry, Florida 32347

Dear Mr. Harding:

Re: Extension of Permit Nos. AC 62-197417, Pulping Sidestream, and AC62-172092,
No. 2 Bleach Plant.

In accordance with our previous correspondence, enclosed you will find a copy of the recently enacted rule language which extends your air construction permit (Rule 62-213.420(1)(a)4., F.A.C.). Therefore, no action is required by the Department and your \$100 fee (\$50 per permit) will be refunded.

Please note the new application dates for the Title V permits have been changed. The acid rain part of the application is due not later than January 1, 1996. The remaining part of your Title V application is due on June 15, 1996.

If you have any questions, contact Mr. Al Linero at the letterhead address or call him at (904)488-1344.

Sincerely,

A handwritten signature in cursive script that reads "C. H. Fancy P.E. for".

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

CHF/al/kw

Enclosure

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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

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

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

Consult postmaster for fee.

3. Article Addressed to:
*C. S. Aiken, Plant Mgr
 The Procter + Gamble
 Cellulose Co
 Rt 3 BOX 260
 Perry, FL 32347-9512*

4a. Article Number
P062 921 974

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

7. Date of Delivery
3/10/93

5. Signature (Addressee)

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

6. Signature (Agent)
A. Moore

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

P 062 921 974

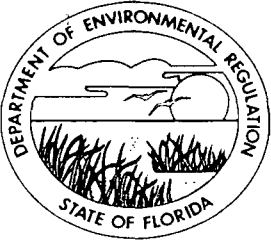


Receipt for Certified Mail

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

Sent to <i>C S Aiken</i>	
Street and No. <i>Procter + Gamble</i>	
P.O. State and ZIP Code <i>Perry FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>3-10-93</i>
<i>AC 62-197417</i>	

PS Form 3800, June 1991



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

March 10, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. S. Aiken
Plant Manager
The Procter & Gamble Cellulose Company
Rt. 3, Box 260
Perry, Florida 32347-9512

Dear Mr. Aiken:

Re: Request for Amendment to Construction Permit
AC 62-197417: Sidestream Pulping Process
Expiration Date Extension

The Department has reviewed Mr. Clifford Henry's letter received on February 26, 1993, which requested an extension of the expiration date for the above referenced project. The Department finds the request acceptable and the following will be changed and/or added:

Expiration Date:

FROM: May 31, 1993
TO: May 31, 1994

Attachment to be Incorporated:

- o Mr. Clifford Henry's letter and processing fee received February 26, 1993.

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

The Petition shall contain the following information:

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

Mr. C. S. Aiken

Expiration Date Extension: AC 62-197417

March 10, 1993

Page 2

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

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

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

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

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

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

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

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/BM/rbm

Attachment

cc: J. Cole, NED
C. Henry, P&GCC

J. Braswell, Esq., DER
A. M. Kinghorn, P.E., SEC

Procter & Gamble

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

February 24, 1993

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

Re: Sidestream Pulping Process Construction Permit No.
AC62-197417

Dear Mr. Fancy:

We are requesting an extension of time to complete the construction of the Sidestream Pulping Process. The current expiration date is May 31, 1993 and we are requesting the expiration date be extended twelve months to May 31, 1994. The extension is being requested so that we may conduct additional emissions testing. The extension has been discussed with Mr. Bruce Mitchell of your office. Enclosed is a check in the amount of \$50 to cover the processing fee.

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

Very Truly Yours,

The Procter & Gamble Cellulose Co.

Clifford Henry

Clifford Henry
Environmental Control Manager

CC:
John L. Cole, FDER Northeast District
Ann Baily, P&GCC

B. Mitchell

RECEIVED
DER - MAIL ROOM
1993 FEB 26 AM 10:06

001031



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Howard L. Rhodes
FROM: Clair Fancy *CF*
DATE: March 9, 1993
SUBJ: Amendment to Construction Permit-Expiration Date Extension
Procter & Gamble Cellulose
Sidestream Pulping Process: AC 62-197417

Enclosed for your review and signature is an expiration date extension amendment to the above referenced permit prepared by the Bureau of Air Regulation. The extension will allow time for performance testing of the source and to allow sufficient time to apply for an operation permit.

Procter & Gamble Cellulose Company is a pulp mill located in Perry, Taylor County, Florida. The proposed project was a sidestream pulping process, permitted as a minor modification to a major facility, and was not to increase plant capacities, water usage, or effluent flow. The project was subject to limitations for particulate matter (PM; 8.02 TPY), PM₁₀ (3.20), and visible emissions (< 20% opacity). This agency action should not be controversial.

I recommend approval and signature of this amendment.

CHF/BM/rbm

Procter & Gamble

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

February 24, 1993

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

Re: Sidestream Pulping Process Construction Permit No.
AC62-197417

Dear Mr. Fancy:

We are requesting an extension of time to complete the construction of the Sidestream Pulping Process. The current expiration date is May 31, 1993 and we are requesting the expiration date be extended twelve months to May 31, 1994. The extension is being requested so that we may conduct additional emissions testing. The extension has been discussed with Mr. Bruce Mitchell of your office. Enclosed is a check in the amount of \$50 to cover the processing fee.

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

Very Truly Yours,

The Procter & Gamble Cellulose Co.

Clifford Henry

Clifford Henry
Environmental Control Manager

CC:
John L. Cole, FDER Northeast District
Ann Baily, P&GCC

B. Mitchell

RECEIVED
DER - MAIL ROOM
1993 FEB 26 AM 10: 06

001031



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Cost Center Air Regulation

FROM: Revenue Section
Bureau of Finance and Accounting

DATE: 03-10-93 (02-26-93)

SUBJECT: Cash Listing # 0058, Deposit # 0551

Please respond to the items marked below and return to the Revenue Section of the Bureau of Finance and Accounting.

- The monies on the attached cash listing have been deposited for your area by the Bureau of Finance and Accounting. A transaction needs to be recorded in PATS for:

<u>Applicant</u>	<u>Amount</u>	<u>Date Received</u>
The Proctor & Gamble Cellulose Company	\$ 50.00	2-28-93

Please enter the transaction(s) and attach a copy of this memo to the PATS cash listing reflecting the payment(s).

- Receipt number _____ on your cash listing number _____ is out of balance by \$ _____. Please correct and forward a corrected cash listing to the Bureau of Finance and Accounting.
- Other:

0/dg

Attachment(s)

The Procter & Gamble Cellulose Company

oley Mill Account
erry, Florida 32347

SUN BANK/TALLAHASSEE N.A.
778 Main Office
2051 Thomasville Rd
Tallahassee, FL 32312
63-778/631

005016

SETTLEMENT OF YOUR ACCOUNT AS FOLLOWS:

02/25/93

\$*****50.00*****

PAY
TO THE
ORDER
OF

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

Sidestream Process

PAY

50 AND 00 CTS.

[Signature]
AUTHORIZED COUNTERSIGNATURE

[Signature]
AUTHORIZED SIGNATURE





**PROCTER & GAMBLE
CELLULOSE**

THE PROCTER & GAMBLE CELLULOSE COMPANY

RT. 3, BOX 260
PERRY, FLORIDA 32347-9512
PHONE (904) 584-0121

RECEIVED

SEP 3 1991

Division of Air
Resources Management

August 30, 1991

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

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

Dear Mr. Andrews:

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

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

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

Very Truly Yours,

The Procter & Gamble Cellulose Co.

Clifford Henry
Clifford Henry
Environmental Control Manager

cc: B. Mitchell
A. Kutynca, WE Dist.



**PROCTER & G
CELLULOSE**

THE
RT.
PEP

*Fold at line over top of envelope to the right
of the return address.*

CERTIFIED

P 290 493 066

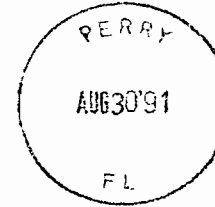
MAIL

Is your **RETURN ADDRESS**
completed on the reverse side?

BLE CELLULOSE COMPANY

7-9512

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



U.S. POSTAGE

229:

H METER 385088

BEST AVAILABLE COPY

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

STATE OF FLORIDA,
COUNTY OF TAYLOR

AFFIDAVIT OF PUBLICATION

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

LEGAL
Notice of Intent of Issue

was published in said newspaper in the issues of: Aug. 28 (1991)

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

Donald D. Lincoln
Donald D. Lincoln, Publisher

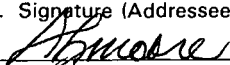
Sworn to and subscribed before me this 28th day of August 1991

Notary Public

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

State of Florida
Department of Environmental Regulation
Notice of Intent of Issue
The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to The Procter and Gamble Cellulose Company, Route 3, Box 260, Perry, Taylor County, Florida 32347, to modify the facility by installing equipment as a sidestream project to process pulp. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.
A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.
The Petition shall contain the following information:
(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
(b) a statement of how and when each petitioner received notice of the Department's action or proposed action;
(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
(d) A statement of the material facts disputed by Petitioner, if any;
(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) A statement of which rules or statutes petitioner contends requires reversal or modification of the Department's action or proposed action; and
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action for proposed action.
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.
The application is available for public inspection during business hours, 8 a.m. to 5 p.m., Monday through Friday, except legal holidays, at:
Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece next to the article number.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Mr. C. S. Aiken Plant Manager The Procter & Gamble Cellulose Co. Rt. 3, Box 260 Perry, FL 32347		4a. Article Number P 832 538 674
		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
		7. Date of Delivery 8/15/91
5. Signature (Addressee) 		8. Addressee's Address (Only if requested and fee is paid)
6. Signature (Agent)		

PS Form 3811, October 1990

U.S. GPO: 1990-273-861

DOMESTIC RETURN RECEIPT

PS Form 3800, June 1990

Sent to Mr. C. S. Aiken, TP&GCC Street & No. Rt. 3, Box 260 P.O., State & Zip Code Perry, FL 32347 Postage \$	Certified Fee Special Delivery Fee Restricted Delivery Fee Return Receipt Showing to Whom & Date Delivered Return Receipt Showing to Whom, Date, & Address of Delivery TOTAL Postage & Fees \$	Postmark or Date Mailed: 8-14-91 Permit: AC 62-197417
--	--	---

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

P 832 538 674



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

August 14, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Aiken:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to modify the facility by installing equipment, as a sidestream project, to process pulp. The proposed project will not increase plant capacities, water usage, or effluent flow.

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

Sincerely,

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

CHF/BM/rbm

Attachments

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

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

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

DER File No. AC 62-197417
Taylor County

INTENT TO ISSUE

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

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

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

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

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

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

The Petition shall contain the following information;

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

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

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

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

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

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

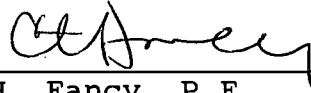
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

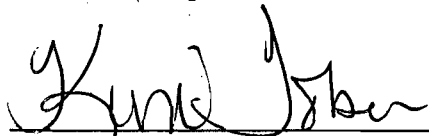
CERTIFICATE OF SERVICE

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

Clerk Stamp

FILING AND ACKNOWLEDGMENT

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



Clerk

8-14-91

Date

Copies furnished to:

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

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

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

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

The Petition shall contain the following information:

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

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

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

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

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

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

Technical Evaluation
and
Preliminary Determination

The Procter & Gamble Cellulose Company
Taylor County
Perry, Florida

Construction Permit Number
AC 62-197417

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

August 14, 1991

I. Application

A. Applicant and Address

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

B. Project and Location

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

C. Process and Controls

The proposed sidestream project will utilize processed pulp and chemicals already used at the mill. The process will have associated exhausts (S1, S2 and S3) that vent pulp fibers and are minor emission sources of particulate matter (PM), PM₁₀ (10 micron size), and visible emissions (VE).

D. SIC and SCC

1. The Standard Industrial Codes are:

o 2611: Pulp Mills

2. The Source Classification Codes are:

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

II. Rule Applicability

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

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

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

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

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

Table 1

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

Note: o Maximum proposed hours of operation are 8760 hrs/yr.
o PM₁₀ emissions @ 40% of PM emissions (test data).

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

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

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

Initial and annual PM₁₀ emissions compliance tests shall be conducted using EPA Method 201 or 201A, as published in 55 Federal Register (FR) 142246 (April 17, 1990) and amended in 56 FR 6278 (February 15, 1991).

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

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

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

III. Summary of Emissions

A. Emission Limitations

The proposed project will have allowable emission limits and standards for the pollutants PM, PM₁₀, and VE. The following table reflects these limits and standards, which are based on the applicant's request/vendor's specifications plus a 20% margin of safety (except for the VE standard/limit):

Table 2

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

Note: 1) Annual hours of operation are 8760.

2) Volumetric flow rates are:

o S1 7150 acfm

o S2 5300 acfm

o S3 4420 acfm

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

4) PM₁₀ emissions @ 40% of PM emissions (test data).

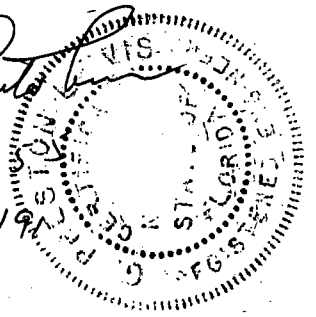
B. Ambient Air Quality Analysis

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

IV. Conclusion

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

A. Pruthi
4175
8/13/97





Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

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

Permit Number: AC 62-197417

Expiration Date: May 31, 1993

County: Bay

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

Project: Sidestream Pulping Process
Modification

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

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

The Standard Industrial Codes are: 2611-Pulp Mill.

The Standard Classification Codes are:

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

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

Attachments to be Incorporated:

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

PERMITTEE:
TP&GCC

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
TP&GCC

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

GENERAL CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:
TP&GCC

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

GENERAL CONDITIONS:

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

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

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

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and,
 - the results of such analyses.

PERMITTEE:
TP&GCC

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

GENERAL CONDITIONS:

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

SPECIFIC CONDITIONS:

1. The sidestream pulping process may operate continuously (i.e., 8760 hrs/yr).

2. The maximum product rate is 2296 lbs/hr of pulp.

3. The sidestream pulping process is subject to the provisions of F.A.C. Rules 17-4.130: Plant Operation-Problems; 17-2.240: Circumvention; and, 17-2.250: Excess Emissions.

4. The sidestream pulping process shall be in compliance with all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1990 version).

5. The sidestream pulping process shall not exceed the following pollutant emission standards/limitations:

Source	Pollutant	Standard/Limitation
o S1	PM	0.65 lb/hr; 2.85 TPY
	PM ₁₀	0.26 lb/hr; 1.14 TPY
	VE	less than 20% opacity
o S2	PM	0.48 lb/hr; 2.10 TPY
	PM ₁₀	0.19 lb/hr; 0.83 TPY
	VE	less than 20% opacity
o S3	PM	0.70 lb/hr; 3.07 TPY
	PM ₁₀	0.28 lb/hr; 1.23 TPY
	VE	less than 20% opacity

Note: 1) Volumetric flow rates are:

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

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

PERMITTEE:
TP&GCC

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

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

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

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

PERMITTEE:
TP&GCC

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

SPECIFIC CONDITIONS:

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

Issued this _____ day
of _____, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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



THE PROCTER & GAMBLE CELLULOSE COMPANY

GENERAL OFFICES

PO BOX 799 CINCINNATI OHIO 45201-0799

August 7, 1991

RECEIVED

AUG 12 1991

Division of Air
Resources Management

VIA OVERNIGHT MAIL

Gary Smallridge, Esq.
Assistant General Counsel
Office of General Counsel
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: The Procter & Gamble Cellulose Company
Proposed Construction Permit No. AC 62-197417
DER File No. AC 62-197417


Dear Mr. Smallridge:

Enclosed for filing please find an original and one copy of The Procter & Gamble Cellulose Company's Motion for Extension of Time in Which to File a Petition for Formal Hearing.

Also, as we discussed in our telephone conversation today, the Company will refrain from publishing the "Notice of Intent to Issue" in a local newspaper until issues regarding confidential information in the draft permit and the "Technical Evaluation and Preliminary Determination" are resolved.

If you have any concerns about this approach, please contact me.

Very truly yours,


Nancy Hill Dowling
Counsel

NHD:lmb
5525X

Enclosure

cc: Ray Perry - Procter & Gamble Cellulose
Clifford Henry - Procter & Gamble Cellulose
Barry Andrews - Department of Environmental Regulation

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

THE PROCTER & GAMBLE CELLULOSE COMPANY)	
CONSTRUCTION PERMIT NO. AC 62-197417)	
)	
Petitioner,)	
)	OGC FILE NO.
vs.)	
)	
STATE OF FLORIDA, DEPARTMENT)	
OF ENVIRONMENTAL REGULATION,)	
)	
Respondent.)	
_____)	

MOTION FOR EXTENSION OF TIME IN
WHICH TO FILE A PETITION FOR FORMAL HEARING

Petitioner, The Procter & Gamble Cellulose Company, through its undersigned attorney, moves the Secretary of the Department of Environmental Regulation, pursuant to Section 17-103.070, Florida Administrative Code, to enter an order granting an extension of time to Petitioner for filing a Petition for Formal Hearing under Section 120.57, Florida Statute.

Petitioner, The Procter & Gamble Cellulose Company, received on July 25, 1991, a Draft Construction Permit No. AC 62-197417 to construct a pulping sidestream project at Procter & Gamble Cellulose Company's existing facility in Perry, Florida.

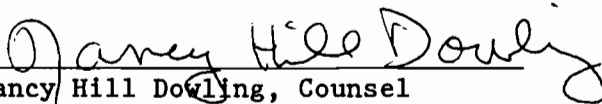
Petitioner moves for this extension of time to enable it to meet informally with staff of the Department to attempt to resolve issues Petitioner has with the "Technical Evaluation and Preliminary Determination" and the draft construction permit. These issues include certain language in

the Technical Evaluation and the draft construction permit such as publication of information from the confidential portion of the application in Tables 1 and 2 of the Technical Evaluation and Table 5 of the draft construction permit, and incorrect descriptions of the function of the process equipment in Paragraph I.C. of the Technical Evaluation and in Paragraph 2 and Specific Condition 9 of the draft construction permit.

Accordingly, Petitioner requests an extension of forty-five (45) days, until September 23, 1991, in which to file a Petition for Formal Hearing.

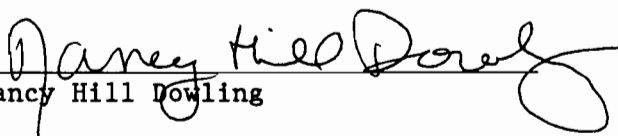
I HEREBY CERTIFY that Petitioner has consulted with the Department's Attorney, Gary Smallridge, who does not object to an extension of time for filing a Petition for Formal Hearing.

Respectfully submitted this 7 day of August, 1991.


Nancy Hill Dowling, Counsel
The Procter & Gamble Cellulose Company
P.O. Box 599
Cincinnati, Ohio 45201-0599
(513) 983-9522

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion for Extension of Time in Which to File a Petition for Formal Hearing has been furnished by an overnight mail service to Gary Smallridge, Assistant General Counsel, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, this 7 day of August, 1991.


Nancy Hill Dowling



**PROCTER & GAMBLE
CELLULOSE**

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

May 28, 1991

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

RECEIVED

MAY 28 1991

**Bureau of
Air Regulation**

Re: Application to Construct Air Pollution Source for
Sidestream Project

Dear Mr. Fancy:

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

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

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

Very truly yours,

The Procter & Gamble Cellulose
Company

Clifford Henry
Plant Environmental Control manager

cc: B. Mitchell
A. Kutyna

DEPARTMENT OF ENVIRONMENTAL REGULATION

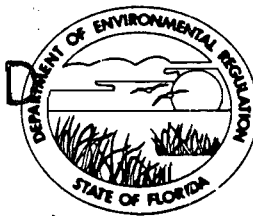
\$200 pd.
5-28-91
Receipt #151276

NORTHEAST DISTRICT

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

RECEIVED

MAY 28 1991



AC62-197417

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

Bureau of
APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Kraft Pulp & Paper [] New¹ [X] Existing¹

APPLICATION TYPE: [X] Construction [] Operation [] Modification

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

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

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

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

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

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

APPLICANT ADDRESS: Route 3 Box 260 Perry, FL 32347

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

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

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

*Attach letter of authorization
Previously Submitted

Signed: C.S. Aiken

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

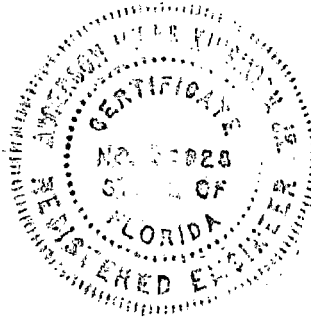
Date: 5/21/91 Telephone No. (904) 584-0121

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

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

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

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



Signed A.M. Kinghorn

A.M. Kinghorn
Name (Please Type)

Sirriner Environmental Consultants
Company Name (Please Type)

P.O. Box 24000, Greenville, SC 29616
Mailing Address (Please Type)

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

SECTION II: GENERAL PROJECT INFORMATION

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

(See Attachment 1)

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

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

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

N/A

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

N/A

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

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

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

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

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

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

** See confidential attachment C3

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

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

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

2. Product Weight (lbs/hr): 2296

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

See attachment 2

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

¹See Section V, Item 2.

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

³Calculated from operating rate and applicable standard.

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

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

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

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____
 Density: _____ lbs/gal Typical Percent Nitrogen: _____
 Heat Capacity: _____ BTU/lb _____ BTU/gal
 Other Fuel Contaminants (which may cause air pollution): _____

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

Annual Average _____ Maximum _____

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

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

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

SECTION IV: INCINERATOR INFORMATION

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

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

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

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

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

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

Brief description of operating characteristics of control devices: _____

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

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

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

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

Yes No

Contaminant	Rate or Concentration

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

Yes No

Contaminant	Rate or Concentration

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

Contaminant	Rate or Concentration

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

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

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

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

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

1.

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

2.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

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

3.

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

4.

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

F. Describe the control technology selected:

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

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

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

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION N/A

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

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

B. Meteorological Data Used for Air Quality Modeling

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

C. Computer Models Used

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

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

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ₂	_____ grams/sec

E. Emission Data Used in Modeling

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

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

THE PROCTER & GAMBLE CELLULOSE COMPANY
SIDESTREAM PROJECT
PERMIT APPLICATION ATTACHMENTS

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

Confidential Attachments:

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

ATTACHMENT 1

THE PROCTER & GAMBLE CELLULOSE COMPANY
SIDESTREAM PROJECTS
PROJECT DESCRIPTION

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

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

ATTACHMENT 2

THE PROCTER & GAMBLE CELLULOSE COMPANY

SIDESTREAM PROJECT

EMISSION ESTIMATES

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

ATTACHMENT 3

THE PROCTER & GAMBLE CELLULOSE COMPANY

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

ACTUAL (MAXIMUM) RATES:

(S1) 7150 ACFM, PM concentration 20 mg/m³ - vendor's estimate

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

= 0.54 lbs/hr = 2.36 ton/yr PM

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

(S2) 5300 ACFM, PM concentration 20 mg/m³ - test data

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

= 0.40 lbs/hr = 1.74 ton/yr PM

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

(S3) 4420 ACFM, PM concentration 35 mg/m³ - vendor's estimate

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

= 0.58 lbs/hr = 2.54 ton/yr PM

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

ALLOWABLE RATES:

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

TEST DATA:

See confidential attachment C5.

ATTACHMENT 4

THE PROCTER & GAMBLE CELLULOSE COMPANY
SIDESTREAM PROJECT

PROPOSED COMPLIANCE METHODS

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

ATTACHMENT 5

THE PROCTER & GAMBLE CELLULOSE COMPANY
SIDESTREAM PROJECT

EMISSION STACK GEOMETRY AND FLOW CHARACTERISTICS

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

3/14/91

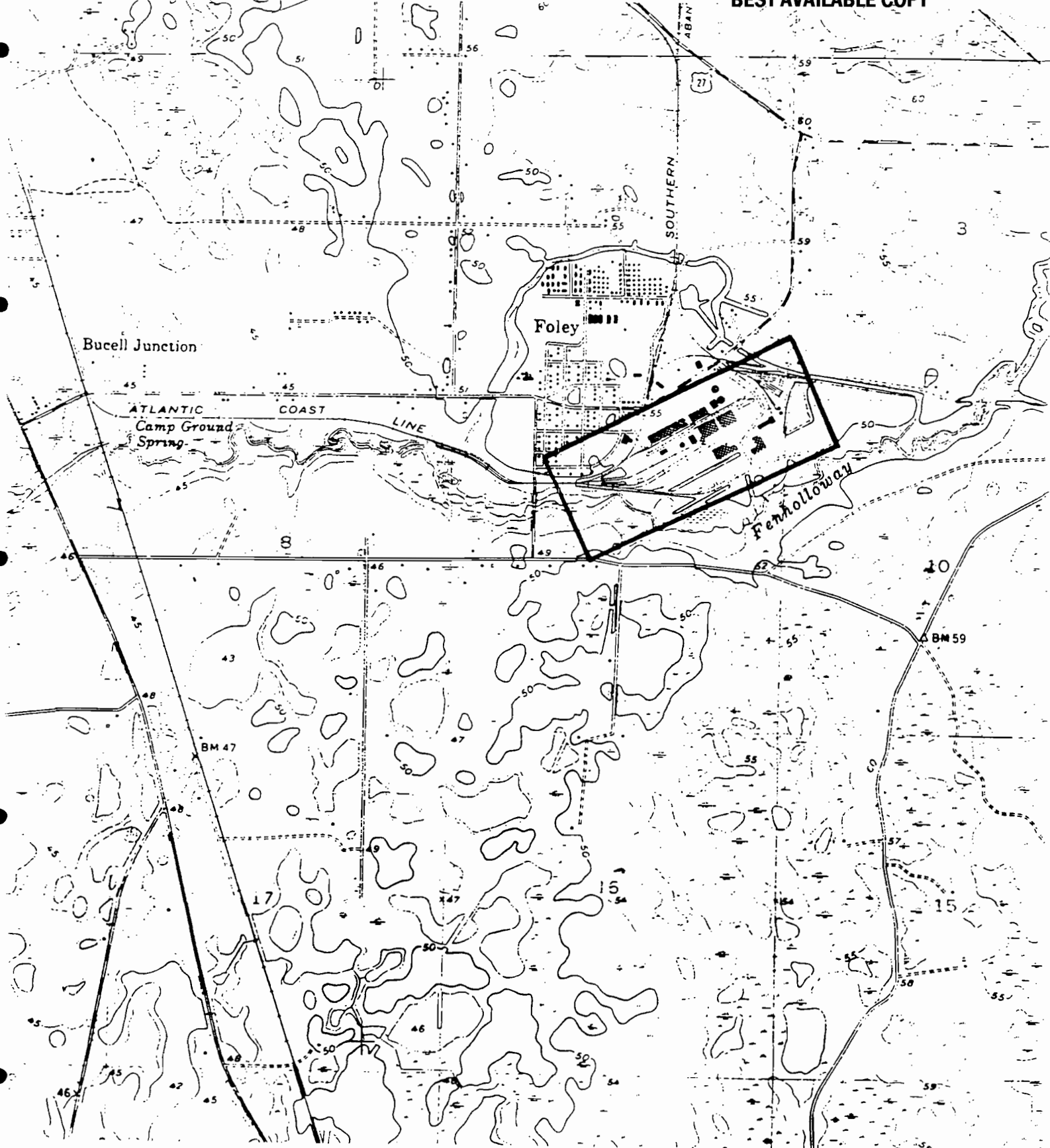


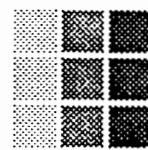
FIGURE 2

U.S.G.S. Location Map

Procter & Gamble Cellulose Co.

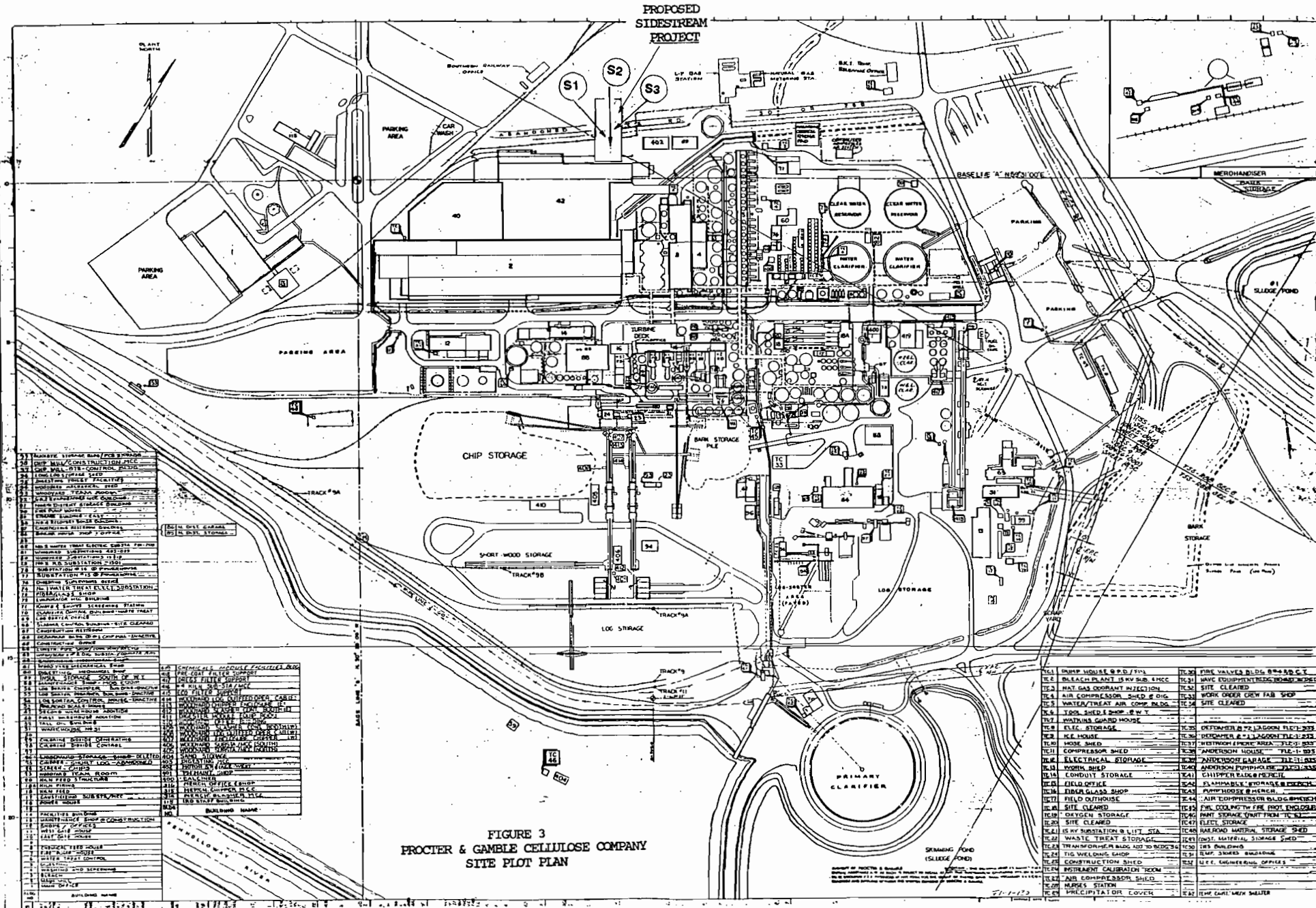
Foley Plant — Perry, Florida

G-9263



SIRRINE
ENVIRONMENTAL
CONSULTANTS

BEST AVAILABLE COPY



31	MANURE STORAGE BUILDING
32	CHIP MILL/COMBINATION UNIT
33	CHIP MILL/COMBINATION UNIT
34	LONG TERM STORAGE
35	WATER TREATMENT PLANT
36	WATER TREATMENT PLANT
37	WATER TREATMENT PLANT
38	WATER TREATMENT PLANT
39	WATER TREATMENT PLANT
40	WATER TREATMENT PLANT
41	WATER TREATMENT PLANT
42	WATER TREATMENT PLANT
43	WATER TREATMENT PLANT
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101	CHEMICALS MODULE
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