

## Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

December 30, 1988

CERTIFIED MAIL - Return Receipt Requested

Mr. Charles S. Aiken, Jr.  
Plant Manager  
Proctor & Gamble Cellulose  
Rt. 3, Box 260  
Perry, Florida 32347

Dear Mr. Aiken:

Re: Amendment to Air Construction Permit  
No. AC 62-141927: No. 1 Bark Boiler

Per a phone conversation on December 21, 1988, Mr. Jim Farmer (PGC) spoke with Mr. Bruce Mitchell (DER/BAQM) requesting that the pre-test for TRS be deleted from Specific Condition No. 19. Since a pre-conversion TRS level is not necessary, the Department agrees with the request and the following will be changed and added:

### Specific Condition

#### No. 19:

From: The No. 1 Bark Boiler shall be tested for TRS and SO<sub>2</sub> emissions before and after connecting the TRS NCG handling system to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The TRS emissions tests, using EPA Methods 3 and 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to verify compliance with the applicable limits. The SO<sub>2</sub> emissions test, using EPA Method 6 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to rule out further emissions review pursuant to FAC Rule 17-2.500, PSD.

Mr. C. S. Aiken, Jr.  
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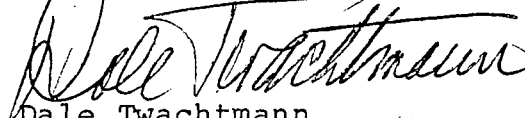
To: The No. 1 Bark Boiler shall be tested for SO<sub>2</sub> emissions before connecting the TRS NCG handling system to it (see C. H. Fancy's letter dated January 22, 1988). The No. 1 Bark Boiler shall be tested for TRS and SO<sub>2</sub> emissions after connecting the TRS NCG handling system to it and the system is operating properly (40 CFR 60.8). The TRS emissions tests, using EPA Methods 3 and 16 or 16A pursuant to F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to verify compliance with the applicable limits. The SO<sub>2</sub> emission test, using EPA Method 6 pursuant to F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to rule out further emissions review pursuant to F.A.C. Rule 17-2.500, PSD.

Attachment to be Incorporated:

13. Mr. Bruce Mitchell's Interoffice Memorandum dated December 22, 1988.

This letter must be attached to your construction permit, No. AC 62-141927, and shall become a part of the permit.

Sincerely,

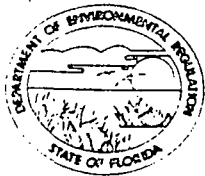
  
Dale Twachtmann  
Secretary

DT/ks

attachment

cc: B. Stewart, NE Dist.  
B. Hewitt, Esq., DER  
R. Andreu, PGC

ATTACHMENT 13



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: File: AC 62-141927  
No. 1 Bark Boiler  
Proctor & Gamble Cellulose

FROM: Bruce Mitchell *RAM*

DATE: December 22, 1988

SUBJ: Amendment Request to Delete TRS Pre-Test

Mr. Jim Farmer, with PGC, called me on December 21, 1988, and requested that the TRS pre-test be deleted from Specific Condition No. 19 in the above referenced Construction Permit. Since a pre-conversion TRS test is not necessary, I told him that I would recommend that it be deleted from the permit via an amendment.