

Bruce

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

March 22, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Sipple:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permits for The Buckeye Cellulose Corporation to make several changes at its existing mill in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2. The changes include replacement of some existing equipment, addition of some new equipment, and the collection and transportation of the TRS gases to the No. 1 Bark Boiler for incineration.

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

Sincerely,

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

CHF/bm

Attachments

cc: B. Stewart, NE District
R. Andreu, BCC
A. M. Kinghor, P.E., SEC, Inc.
B. Pittman, Esq.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Applications for Permits by:

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

DER File No. AC 62-141916
62-141917
62-141918
62-141919
62-141920
62-141921
62-141922
62-141924
62-141925
62-141926
62-141927

INTENT TO ISSUE

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

The applicant, The Buckeye Cellulose Corporation (BCC), applied on November 12, 1987, to the Department of Environmental Regulation for a permit to make several changes at its existing mill in order to achieve compliance with total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2, which includes the replacement of some existing equipment, addition of some new equipment, and the collection and transportation of the TRS noncondensable gas (NCG) from various sources to the No. 1 Bark Boiler for incineration. Control systems will be installed on TRS sources that will not be associated with the TRS NCG system, such as the Tall Oil Plant and the Nos. 2-4 Smelt Dissolving Tanks. The location of the proposed project will be at BCC's existing facility in Perry, Taylor County, Florida.

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

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

The Department will issue the permits with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copy enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit applications. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

B. Stewart, NE District
R. Andreu, BCC
A. M. Kinghorn, P.E., SEC, Inc.
B. Pittman, Esq.

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

28-5.15 Requests for Formal and Informal Proceedings

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 3-22-88.

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

Martha Wise
Clerk

3-22-88
Date

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to The Buckeye Cellulose Corporation (BCC), applied on November 12, 1987, to the Department of Environmental Regulation for a permit to make several changes at its existing mill in order to achieve compliance with total reduced sulfur (TRS) regulations contained in Florida Administrative Code Rule 17-2, which includes the replacement of some existing equipment, addition of some new equipment, and the collection and transportation of the TRS noncondensable gas (NCG) from various sources to the No. 1 Bark Boiler for incineration. Control systems will be installed on TRS sources that will not be associated with the TRS NCG system, such as the Tall Oil Plant and the Nos. 2-4 Smelt Dissolving Tanks. The location of the proposed project will be at BCC's existing facility in Perry, Taylor County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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

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

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

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

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

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

Technical Evaluation
and
Preliminary Determination

The Buckeye Cellulose Corporation
Taylor County
Perry, Florida

Construction Permit No. AC 62-141916
62-141917
62-141918
62-141919
62-141920
62-141921
62-141922
62-141924
62-141925
62-141926
62-141927

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

March 22, 1988

I. Application

A. Applicant

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

B. Project and Location

The Buckeye Cellose Corporation (BCC) proposes several changes at its existing mill in order to achieve compliance with the total reduced sulfur (TRS) regulations contained in Florida Administration Code (FAC) Rule 17-2. The changes include replacement of existing equipment, addition of new equipment, and the collection, transportation and incineration of the noncondensable gases (NCG). The NCG will be incinerated in the existing No. 1 Bark Boiler. An alkaline scrubber system will be used as a back-up control system to minimize NCG emissions when the No. 1 Bark Boiler is out of service. Specifically, the following changes are proposed:

- ° For the batch digester systems (Nos. 1 and 2), a new blow heat accumulator with new condensers and heat exchangers will be installed. Gases from the existing entrainment separators, blow tanks, and associated flash tanks will be routed to the new hot water accumulator. Piping design will allow the capability to isolate the accumulator from either digesting system for maintenance while the other continues to operate. Equipment will be installed to collect and transport the NCG to the No. 1 Bark Boiler.
- ° For the multiple effect evaporator (MEE) systems (Nos. 1, 2, 3 and 4), the NCG from the evaporator hotwells are currently directed to the smelt dissolving tank (SDT) scrubbers. Equipment will be installed to collect and transport the NCG to the No. 1 Bark Boiler.
- ° For the Tall Oil Plant system, equipment will be installed to scrub the TRS gases liberated from the continuous tall oil acidulation process. A new high efficiency alkaline scrubber will replace the existing scrubber in the tall oil plant.

A new fan will convey gases from the vents of the centrifugal feed tank, the weir tank, the degasifier tank, the basket-strainer, and the degasifier condenser through the new scrubber. The gases from the degasifier and basket-strainer vents are currently being collected and scrubbed in the existing scrubber.

An alkaline scrubber solution will be supplied to the scrubber from the digester feed system. After passing through the scrubber, the liquor will be returned to the plant.

- ° For the smelt dissolving tanks (Nos. 2, 3 and 4), new equipment will be installed to monitor surrogate parameters for the existing alkaline scrubbers on the SDTs' vents. Compliance will be achieved concurrently with the redirection of the NCG from the MEE systems to the No. 1 Bark Boiler.
- ° For the existing No. 1 Bark Boiler, modification to the boiler air and flue gas system will be necessary to prevent corrosion of the boiler as a result of NCG incineration. A new corrosion resistant mist eliminator will be installed in the existing venturi scrubber. A pH control system will be added to the scrubber water recycle system to ensure adequate pH control and SO₂ removal.

The NCG handling system will be constructed/installed and connected to the No. 1 Bark Boiler to deliver the NCG from the Nos. 1 and 2 batch digester systems and the Nos. 1, 2, 3 and 4 MEE systems.

- ° A back-up alkaline scrubber will be constructed/installed to minimize NCG emissions when the No. 1 Bark Boiler is out of service.

The Standard Industrial Codes are:

1. No. 2621 - Paper Mills

The Standard Classification Codes are:

1. Pulp and Paper Industry

Major Group 26: Sulfate (Kraft) Pulping

- o Batch Digester System (2) 3-07-001-01 (tons ADUP)
- o No. 5 MEE System (4) 3-07-001-03 (tons ADUP)
- o SDT (3) 3-07-001-05 (tons ADUP)
- o Tall Oil Plant 3-07-001-99 (tons ADUP)

Major Group 49: External Combustion Boilers:

- o Wood/Bark Waste 1-02-009-02 (tons burned)

C. Process and Controls

In the kraft process, the white liquor (sodium hydroxide and sodium sulfide), or cooking liquor, is added to the wood chips in the digesters and cooked. At the end of the cooking cycle,

the contents of the vessel(s) are blown to a tank at atmospheric pressure, flashing off steam and NCG. The NCG will be collected and transported to the No. 1 Bark Boiler.

The cellulose fibers (pulp) are separated from the cooking liquor in the pulp washers. The pulp then goes through several processes and finally to the paper machine.

The spent liquor (black liquor) is then concentrated in the multiple effect evaporator systems. Turpentine is a product of this cycle and is collected in a turpentine recovery system. NCG emitted will be collected and transported to the No. 1 Bark Boiler.

Sodium sulfate is added to the concentrated black liquor to make up for chemical losses. The liquor is burned in the recovery boiler, producing a smelt of sodium carbonate and sodium sulfide.

The smelt (green liquor solids) is dissolved in weak wash to form green liquor. The emissions of total reduced sulfur (TRS), particulate matter (PM), and visible emissions (VE) will be controlled with an alkaline scrubber system.

The green liquor is then slaked in the slaker system, in which quicklime (calcium oxide) is added to the green liquor to convert the sodium carbonate back to sodium hydroxide, thus reconstituting the cooking liquor. The PM emissions from the slaker system (slaker and associated causticizers) will be controlled with a scrubber system.

The spent lime cake (calcium carbonate) from the slaking cycle is recalcined in a rotary lime kiln (No. 4) to produce quicklime for recausticizing the green liquor. The PM emissions and VE will be controlled with an electrostatic precipitator (ESP).

Purchased lime is delivered by both rail and truck to make up for process losses. The lime from the lime kiln (No. 4) and deliveries will be stored in lime storage bins. The PM emissions and VE will be controlled with a baghouse filter system.

In the Tall Oil Plant, soap from the soap tanks is sent to an acidulator, where acid and steam are added to produce lignin and tall oil. The mixture is sent through a degasifier, a basket-strainer, cyclones, a centrifuge feed tank, and a centrifuge, where the tall oil is separated from the lignin solution. The tall oil is sent to storage tank(s) and the lignin solution is dispensed into a weir tank and eventually recycled back to the mill. A new alkaline scrubber will replace the existing scrubber. TRS emissions will be collected from the vents of the centrifugal feed tank, the weir tank, the degasifier

tank, the basket-strainer, and the degasifier condenser, and conveyed to the new scrubber. The scrubber medium will be white liquor from the digester systems and will be recycled after passing through the scrubber.

II. Rule Applicability

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

The applications packages were deemed complete on January 15, 1988.

Taylor County is an area designated attainment for all pollutants.

The existing mill is a major emitting facility in accordance with FAC Rule 17-2.100(111) for the pollutants particulate matter (PM), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), total reduced sulfur (TRS), and volatile organic compounds (VOC). The facility is a kraft pulp mill, which is one of the major facility categories listed in Table 500-1, FAC Rule 17-2.

Based on the applicant's response, the Nos. 1 and 2 Batch Digester Systems, the Tall Oil Plant, the Nos. 1-4 MEE Systems, the Nos. 2-4 SDTs, and the No. 1 Bark Boiler are considered existing non-NSPS (new source performance standards) sources. For these sources, construction permit applications were required pursuant to FAC Rule 17-2.960(1)(d).

Since the applicant proposes to install a noncondensable gas (NCG) handling system to service the Nos. 1 and 2 Batch Digester Systems and the Nos. 1-4 MEE Systems, and these gases will be incinerated in the No. 1 Bark Boiler, it will be assumed that these sources will have zero potential emissions to ambient when connected to the NCG system and no allowable pollutant emissions and, therefore, exempt from review pursuant to FAC Rule 17-2.500, Prevention of Significant Deterioration (PSD). The applicant projects that the SO₂ emissions, from the oxidation of the incinerated TRS gases, will increase in the No. 1 Bark Boiler, which will have a scrubber system with an estimated SO₂ removal efficiency of 40%, minimum. These assumptions will be verified through pre and post tests for both TRS and SO₂ (see January 22, 1988 letter from C. H. Fancy). The results of the tests and their evaluations and comparisons will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee(s) pursuant to FAC Rule 17-4 for the NCG handling system's associated sources and the No. 1 Bark Boiler.

Of the projected SO₂ emissions from the No. 1 Bark Boiler, 3426.3 TPY will be contributed from the incineration of the TRS emissions from the NCG system. Because the increase was above the significant level of 40 TPY pursuant to Table 500-2, FAC 17-2, a model screening analysis was performed.

Since the project did not constitute a modification pursuant to FAC Rule 17-2.100(118), the emissions are subject to review pursuant to FAC Rule 17-2.520, Sources not Subject to PSD or Nonattainment Requirements. However, the emissions do consume increment.

The No. 1 Bark Boiler is subject to the provisions of FAC Rule 17-2.600(4)(c)6., Other Combustion Devices Used to Incinerate TRS Emissions, in which the emission limiting standard is 5 ppm by volume on a dry basis at standard conditions corrected to 10% oxygen as a 12-hour average (2.26 lbs/hr, 10.07 TPY). A pre and post test for TRS and SO₂ shall be performed to verify the destruction of the TRS gases from the NCG handling system and to establish the overall SO₂ removal efficiency of the No. 1 Bark Boiler (see the January 22, 1988 letter from C. H. Fancy). Test methods that shall be used are EPA Methods 3, 6, 16 or 16A, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

The No. 1 Bark Boiler is subject to the provisions of FAC Rule 17-2.600(10)(a)2. for both PM emissions and visible emissions (VE). For PM, the emission limiting standard is 0.158 lb/MMBtu heat input of carbonaceous fuel, which is less than the standard (see AO 62-126397), and 0.1 lb/MMBtu heat input of fossil fuel. The VE standard is not to exceed 30% opacity, except for 40% opacity for not more than two minutes in any one hour. Since the source is to operate mainly on carbonaceous fuel, annual emissions for PM are projected while on wood waste. The fuel oil is limited to a maximum of 2.5% sulfur content by weight.

The Nos. 2-4 SDTs are subject to the provisions of FAC Rules 17-2.600(4)(c)4.a. and 17-2.600(4)(c)4.b. According to FAC Rule 17-2.600(4)(c)4.a., the TRS emission limiting standard is 0.048 pound per each 3000 pounds black liquor solids as hydrogen sulfide. According to FAC Rule 17-2.600(4)(c)4.b., the Nos. 2-4 SDTs shall be in compliance with FAC Rule 17-2.710, Continuous Monitoring Requirements, and FAC Rule 17-2.960(1), Compliance Schedules. Compliance shall be demonstrated using EPA Methods 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the Nos. 2-4 SDTs shall be in compliance with FAC Rules 17-2.710(3), Establishing Specific Surrogate Parameters.

Pursuant to FAC Rule 17-2.960(1)(d)1.b., the Nos. 1 and 2 Batch Digester Systems and the Nos. 1-4 MEE Systems are to be in final compliance by May 12, 1989.

There are not any contemporaneous pollutant emission changes associated with this project. The potential emissions projected from each affected source are only associated with complying with the TRS regulations.

The following table will exhibit the potential pollutant emissions from the project in tons per year (TPY):

Table 1

Source	Potential Pollutant Emissions (TPY)		
	PM	SO ₂	TRS
Nos. 1 & 2 Batch Digester Sys.			0
Nos. 1-4 MEE Sys.			0
Nos. 2 SDT	102.5		6.83
3 SDT	92.4		5.76
4 SDT	118.7		8.67
Tall Oil Plant			1.62
No. 1 Bark Boiler	207.2	6346	10.07
Total:	520.8	6346	32.95

Note: o Hours of operation at 8760.
o Emissions based on:

1. SDTs

a. PM : Process Weight (FAC Rule 17-2.610(1))

- 1) #2 - 41,187 lbs/hr smelt
- 2) #3 - 34,752 lbs/hr smelt
- 3) #4 - 52,254 lbs/hr smelt

b. TRS: 0.048/3000 lbs BLS (FAC Rule 17-2.600(4)(c)4.)

- 1) #2 RB - 97,600 lbs/hr BLS
- 2) #3 RB - 82,350 lbs/hr BLS
- 3) #4 RB - 123,825 lbs/hr BLS

2. Tall Oil Plant

a. TRS: 0.05 lb/ton crude tall oil produced, 12-hr avg.
(FAC Rule 17-2.600(4)(c)2.)

3. No. 1 Bark Boiler

a. PM : FAC Rule 17-2.600(10)(a)2.b.

- 1) Wood Waste : 0.158 lb/MMBtu heat input
300 MMBtu/hr heat input
- 2) Fossil fuel: 0.1 lb/MMBtu heat input
240 MMBtu/hr heat input

b. SO₂: See application attachment (stoichiometric calc)

dated April 30, 1980 (AO 62-48928)

240 MMBtu/hr heat input; 18,000 Btu/lb;

2.5% sulfur content by weight

c. TRS: 5 ppmvd @ std. conditions @10% O₂, 12-hr avg.

(FAC Rule 17-2.600(4)(c)6.);

100,000 acfm; 145° F; 21.5% H₂O; 7.3% O₂

The PM mass emission limits for the Nos. 2-4 SDTs are based on FAC Rule 17-2.610(1), Process Weight Table, and a maximum total process input rate of smelt (green liquor solids). Compliance shall be demonstrated using EPA Method 5 or 17 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

The VE limiting standard for the Nos. 2-4 SDTs are less than 20% opacity pursuant to FAC Rule 17-2.610(2). Compliance shall be demonstrated using EPA Method 9 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

The Nos. 2-4 SDTs shall be in final compliance by May 12, 1989, pursuant to FAC Rule 17-2.960(1)(d)1.b.

In accordance with FAC Rule 17-2.600(4)(c)2., TRS emissions from the Tall Oil Plant operation shall not exceed 0.05 lb/ton crude tall oil produced as a 12-hour average. Compliance shall be demonstrated using EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Pursuant to FAC Rule 17-2.600(4)(c)2.b., the Tall Oil Plant is subject to the requirements of FAC Rule 17-2.710, which includes FAC Rule 17-2.710(3), General Requirements and Establishing Specific Surrogate Parameters.

The Tall Oil Plant shall be in final compliance by May 12, 1989, pursuant to FAC Rule 17-2.960(1)(d)1.b.

The Nos. 2-4 SDTs and the Tall Oil Plant are subject to the provisions of FAC Rule 17-2.971(2)(c), Compliance Schedules for Continuous Monitoring Requirements, which requires compliance by August 12, 1989.

All of the sources are subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operations-Problems. Any notification required should be made or sent to the DER's Northeast District office.

All of the sources are subject to the provisions of FAC Rule 17-2.700(4), Quarterly Reporting Requirements, and 17-4.140, Reports.

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

A meter shall be installed to measure the scrubbing liquid supply pressure on the Tall Oil Plant operations scrubber, and the Nos. 2-4 SDTs scrubbers, and the pressure sensor or tap is to be located close to the scrubber liquid discharge point. The monitoring device is to be certified by the manufacturer to be accurate within ± 15 percent of design scrubbing liquid supply pressure.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

Since all of the pollutant emissions from the Nos. 1 and 2 Batch Digester Systems and the Nos. 1-4 MEE Systems will be vented to the No. 1 Bark Boiler for incineration, there will not be any potential or allowable emissions permitted.

The regulated pollutant emissions from the proposed project are PM, SO₂ and TRS. Various sources contained in the proposed project are subject to visible emission (VE) standards. The following table will reflect the maximum allowable emissions standards and limits applicable to the proposed project:

Table 2

Source	Pollutant	Maximum Allowable Emissions Standard/Limit
No. 1 Bark Boiler		
a. Wood Waste	PM	0.158 lb/MMBtu heat input (47.25 lbs/hr, 207 TPY)
	SO ₂	783 lbs/hr, 3426.3 TPY
	VE	Not greater than 30% Opacity, except 40% Opacity for 2 mins/hr
	TRS	2.26 lbs/hr, 10.1 TPY
b. Fuel Oil	PM	0.1 lb/MMBtu heat input (24.0 lbs/hr) to minimize fuel oil usage
	SO ₂	1449 lbs/hr, 6346 TPY 2.5% sulfur content by weight
	VE	Not greater than 30% Opacity, except 40% Opacity for 2 mins/hr
	TRS	2.26 lbs/hr, 10.1 TPY
Nos. 2-4 SDTs		
a. #2	PM	23.4 lbs/hr, 102.5 TPY
	TRS	Not to exceed 0.048 lb/3000 lbs BLS as H ₂ S (1.56 lbs/hr, 6.8 TPY)
b. #3	PM	21.1 lbs/hr, 92.4 TPY
	TRS	Not to exceed 0.048 lb/3000 lbs BLS as H ₂ S (1.32 lbs/hr, 5.8 TPY)
c. #4	PM	27.1 lbs/hr, 118.7 TPY
	TRS	Not to exceed 0.048 lb/3000 lbs BLS as H ₂ S (1.98 lbs/hr, 8.7 TPY)
d. all SDTs	VE	Not to exhibit 20% opacity or greater
Tall Oil Plant	TRS	Not to exceed 0.05 lb/ton crude tall oil produced as a 12-hour average (0.37 lb/hr, 1.6 TPY)

Note: see Table 1's Note for rationale

The emission limiting standards and limits are consistent with the applicable requirements pursuant to FAC Rules 17-2 and 17-4.

B. Air Quality Analysis

An air dispersion modeling analysis was submitted by the applicant for The Buckeye Cellulose Corporation's Foley Plant located near Perry, Florida. The study addressed the potential SO₂ air quality impacts resulting from the incineration of noncondensable/TRS gases in the No. 1 Bark Boiler. No other criteria or non-criteria pollutant impacts were addressed in this study.

The modeling analysis was performed for evaluating compliance with the various air quality standards and PSD increments. The study included modeling results and an analysis of ambient background concentration of SO₂.

The modeling results, combined with a background concentration, indicate that the Foley Plant is not expected to cause or contribute to a violation of any SO₂ PSD increment or ambient air quality standard.

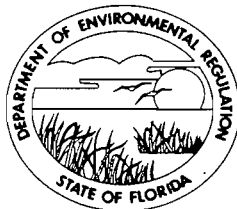
IV. Conclusion

The allowable pollutant emissions limiting standards and limits from the proposed project should not cause any violation to Florida's ambient air quality standards.

The General and Specific Conditions listed in the proposed permits (attached) will assure compliance with all applicable requirements of FAC Rules 17-2 and 17-4.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 62-141916
Expiration Date: September 24, 1989
County: Taylor
Latitude/Longitude: 30° 03' 59"N
83° 33' 12"W

Project: No. 1 Batch Digester System

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

For the permitting of the No. 1 batch digester system and the construction/installation of a noncondensable gas (NCG) handling system to capture and deliver NCG emissions to the No. 1 Bark Boiler for incineration. The No. 1 batch digester system consists of 11 batch digesters (Nos. 1-11 and Nos. 10 and 11 are swing units), No. 1 blow and flash tank, a new blow heat accumulator with primary and secondary condensers and heat exchangers, and a turpentine recovery system. The new hot water accumulator will replace two old ones and condense steam from the blow and flash tanks (Nos. 1 and 2). The maximum hourly production rate shall not exceed 55 TPH ADUP (tons per hour of air dried unbleached pulp and based on a nominal utilization rate of 231,833 lbs/hr of wood chips (dry) and 77,245 lbs/hr cooking liquor (dry and as Na₂O)). The maximum daily production rate shall not exceed 1320 TPD ADUP (tons per day of air dried unbleached pulp) and will be used for PSD (prevention of significant deterioration) review purposes. The location of the project will be at the permittee's existing facility. The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Batch Digester System 3-07-001-01

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

ATTACHMENTS

AC 62-141916

Attachments to be Incorporated:

1. Buckeye's application package dated November 11, 1987, received November 12, 1987.
2. C. H. Fancy's letter dated December 11, 1987.
3. C. H. Fancy's letter dated December 22, 1987.
4. Buckeye's letter dated January 5, 1988, received January 15, 1988.
5. C. H. Fancy's letter dated January 22, 1988.
6. Buckeye's letter dated January 22, 1988, received January 26, 1988.
7. Buckeye's letter dated February 10, 1988, received February 12, 1988.
8. Technical Evaluation and Preliminary Determination dated March 22, 1988.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141916
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141916
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141916
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141916
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The No. 1 batch digesting system may operate continuously, i.e., 8760 hours per year.
2. The maximum hourly production rate shall not exceed 55 TPH ADUP (based on a nominal utilization rate of 231,833 lbs/hr wood chips (dry) and 77,245 lbs/hr cooking liquor (dry and as Na₂O)). The maximum daily production rate shall not exceed 1320 TPD ADUP and will be used for PSD review purposes.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141916
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The batch digester system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 1 Bark Boiler, from which the exhaust gases shall not contain TRS in excess of 5 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average pursuant to FAC Rule 17-2.600(4)(c)6.
4. The batch digester system is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.
5. Objectionable odors shall not be allowed off of plant property in accordance with FAC Rule 17-2.620(2).
6. The batch digester system is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.
7. The batch digester system is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.
8. Compliance tests using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be conducted if the permittee does not incinerate the TRS gases from the batch digester system in the No. 1 Bark Boiler.
9. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.
10. Pursuant to FAC Rule 17-2.600(4)(c)1.d., the batch digester system is subject to the provisions of FAC Rule 17-2.960(1), Compliance Schedules, which requires that final compliance be demonstrated by the permittee by May 12, 1989.
11. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.
12. The DER's Northeast District office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the NE District office within 45 days of test completion.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141916
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

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

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

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

15. The No. 1 Bark Boiler construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the No. 1 Bark Boiler is the pollution control device for the batch digester system.

16. The No. 1 Bark Boiler shall be tested for TRS and SO₂ emissions after the batch digester system's TRS noncondensable gas handling system has been connected to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (greater than 100 TPY potential pollutant emissions) has already been received.

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

PERMITTEE: Permit Number: AC 62-141917
The Buckeye Cellulose Corp. Expiration Date: September 24, 1989
Rt. 3, Box 260 County: Taylor
Perry, Florida 32347 Latitude/Longitude: 30° 03' 59"N
83° 33' 12"W
Project: No. 2 Batch Digester System

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

For the permitting of the No. 2 batch digester system and the construction/installation of a noncondensable gas (NCG) handling system to capture and deliver NCG emissions to the No. 1 Bark Boiler for incineration. The No. 2 batch digester system consists of 10 batch digesters (Nos. 10-19 and Nos. 10 and 11 are swing units), No. 2 blow and flash tank, a new blow heat accumulator with primary and secondary condensers and heat exchangers, and a turpentine recovery system. The new hot water accumulator will replace two old ones and condense steam from the blow and flash tanks (Nos. 1 and 2). The maximum hourly production rate shall not exceed 50 TPH ADUP (tons per hour of air dried unbleached pulp and based on a nominal utilization rate of 212,333 lbs/hr wood chips (dry) and 70,748 lbs/hr cooking liquor (dry and as Na₂O)). The maximum daily production rate shall not exceed 1200 TPD ADUP (tons per day of air dried unbleached pulp) and will be used for PSD (prevention of significant deterioration) review purposes. The location of the project will be at the permittee's existing facility. The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Batch Digester System 3-07-001-01

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

ATTACHMENTS

AC 62-141917

Attachments to be Incorporated:

1. Buckeye's application package dated November 11, 1987, received November 12, 1987.
2. C. H. Fancy's letter dated December 11, 1987.
3. C. H. Fancy's letter dated December 22, 1987.
4. Buckeye's letter dated January 5, 1988, received January 15, 1988.
5. C. H. Fancy's letter dated January 22, 1988.
6. Buckeye's letter dated January 22, 1988, received January 26, 1988.
7. Buckeye's letter dated February 10, 1988, received February 12, 1988.
8. Technical Evaluation and Preliminary Determination dated March 22, 1988.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141917
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141917
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141917
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141917
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The No. 2 batch digesting system may operate continuously, i.e., 8760 hours per year.

2. The maximum hourly production rate shall not exceed 50 TPH ADUP (based on a nominal utilization rate of 212,333 lbs/hr wood chips (dry) and 70,748 lbs/hr cooking liquor (dry and as Na₂O)). The maximum daily production rate shall not exceed 1200 TPD ADUP and will be used for PSD review purposes.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141917
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The batch digester system is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 1 Bark Boiler, from which the exhaust gases shall not contain TRS in excess of 5 ppmvd at standard conditions corrected to 10% O₂ as a 12-hour average pursuant to FAC Rule 17-2.600(4)(c)6.

4. The batch digester system is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

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

6. The batch digester system is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

7. The batch digester system is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.

8. Compliance tests using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be conducted if the permittee does not incinerate the TRS gases from the batch digester system in the No. 1 Bark Boiler.

9. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

10. Pursuant to FAC Rule 17-2.600(4)(c)1.d., the batch digester system is subject to the provisions of FAC Rule 17-2.960(1), Compliance Schedules, which requires that final compliance be demonstrated by the permittee by May 12, 1989.

11. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141917
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

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

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

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

15. The No. 1 Bark Boiler construction/operating permit(s) or any succeeding permit shall have a Specific Condition that the No. 1 Bark Boiler is the pollution control device for the batch digester system.

16. The No. 1 Bark Boiler shall be tested for TRS and SO₂ emissions after the batch digester system's TRS noncondensable gas handling system has been connected to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (greater than 100 TPY potential pollutant emissions) has already been received.

Issued this ____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 62-141918
Expiration Date: September 24, 1989
County: Taylor
Latitude/Longitude: 30° 03' 59"N
83° 33' 12"W
Project: No. 1 Multiple Effect
Evaporator System

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

For the permitting of the No. 1 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s) and concentrator(s). A noncondensable gas (NCG) handling system will be constructed to collect and transport all of the NCG emissions from the No. 1 MEE System to the No. 1 Bark Boiler for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o MEE System 3-07-001-03

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

Attachments to be Incorporated:

1. Buckeye's application package dated November 11, 1987, received November 12, 1987.
2. C. H. Fancy's letter dated December 11, 1987.
3. C. H. Fancy's letter dated December 22, 1987.
4. Buckeye's letter dated January 5, 1988, received January 15, 1988.
5. C. H. Fancy's letter dated January 22, 1988.
6. Buckeye's letter dated January 22, 1988, received January 26, 1988.
7. Buckeye's letter dated February 10, 1988, received February 12, 1988.
8. Technical Evaluation and Preliminary Determination dated March 22, 1988.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141918
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141918
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141918
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141918
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The No. 1 MEE System may operate continuously, i.e., 8760 hours/year.
2. The maximum total process input rate to the No. 1 MEE System shall not exceed 156,000 lbs/hr of Black Liquor Solids (BLS).

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141918
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The No. 1 MEE System is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 1 Bark Boiler, from which the exhaust gases shall not contain TRS in excess of 5 ppmvd corrected to 10% O₂, in accordance with FAC Rule 17-2.600(4)(c)6.

4. The No. 1 MEE System is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

5. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

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

7. In the event that a compliance test has to be performed on the No. 1 MEE System for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used.

8. Pursuant to FAC Rule 17-2.600(4)(c)1.d., the No. 1 MEE System is subject to the provisions of FAC Rule 17-2.960(1), Compliance Schedules, which requires that final compliance be demonstrated by the permittee by May 12, 1989.

9. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

10. The No. 1 MEE System is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

11. The No. 1 MEE System is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141918
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

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

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

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

15. The No. 1 Bark Boiler construction/operating permit(s) or any succeeding permit shall have a Specific Condition that it is the pollution control device for the No. 1 MEE System.

16. The No. 1 Bark Boiler shall be tested for TRS and SO₂ emissions after the No. 1 MEE System's TRS noncondensable gas handling system has been connected to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (greater than 100 TPY potential pollutant emissions) has already been received.

Issued this _____ day of _____,
19__.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

PERMITTEE: The Buckeye Cellulose Corp.
Rt. 3, Box 160
Perry, Florida 32347

Permit Number: AC 62-141919
Expiration Date: September 24, 1989
County: Taylor
Latitude/Longitude: 30° 03' 59"N
83° 33' 12"W
Project: No. 2 Multiple Effect
Evaporator System

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

For the permitting of the No. 2 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s) and concentrator(s). A noncondensable gas (NCG) handling system will be constructed to collect and transport all of the NCG emissions from the No. 2 MEE System to the No. 1 Bark Boiler for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o MEE System 3-07-001-03

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

Attachments to be Incorporated:

1. Buckeye's application package dated November 11, 1987, received November 12, 1987.
2. C. H. Fancy's letter dated December 11, 1987.
3. C. H. Fancy's letter dated December 22, 1987.
4. Buckeye's letter dated January 5, 1988, received January 15, 1988.
5. C. H. Fancy's letter dated January 22, 1988.
6. Buckeye's letter dated January 22, 1988, received January 26, 1988.
7. Buckeye's letter dated February 10, 1988, received February 12, 1988.
8. Technical Evaluation and Preliminary Determination dated March 22, 1988.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141919
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141919
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141919
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141919
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The No. 2 MEE System may operate continuously, i.e., 8760 hours/year.
2. The maximum total process input rate to the No. 2 MEE System shall not exceed 156,000 lbs/hr of Black Liquor Solids (BLS).

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141919
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The No. 2 MEE System may operate continuously, i.e., 8760 hours/year.

2. The maximum total process input rate to the No. 2 MEE System shall not exceed 195,000 lbs/hr of Black Liquor Solids (BLS).

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141919
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The No. 2 MEE System is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 1 Bark Boiler, from which the exhaust gases shall not contain TRS in excess of 5 ppmvd corrected to 10% O₂, in accordance with FAC Rule 17-2.600(4)(c)6.

4. The No. 2 MEE System is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

5. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

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

7. In the event that a compliance test has to be performed on the No. 2 MEE System for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used.

8. Pursuant to FAC Rule 17-2.600(4)(c)1.d., the No. 2 MEE System is subject to the provisions of FAC Rule 17-2.960(1), Compliance Schedules, which requires that final compliance be demonstrated by the permittee by May 12, 1989.

9. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

10. The No. 2 MEE System is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

11. The No. 2 MEE System is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141919
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

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

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

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

15. The No. 1 Bark Boiler construction/operating permit(s) or any succeeding permit shall have a Specific Condition that it is the pollution control device for the No. 2 MEE System.

16. The No. 1 Bark Boiler shall be tested for TRS and SO₂ emissions after the No. 2 MEE System's TRS noncondensable gas handling system has been connected to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (greater than 100 TPY potential pollutant emissions) has already been received.

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 62-141920
Expiration Date: September 24, 1989
County: Taylor
Latitude/Longitude: 30° 03' 59"N
83° 33' 12"W

Project: No. 3 Multiple Effect
Evaporator System

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

For the permitting of the No. 3 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s) and concentrator(s). A noncondensable gas (NCG) handling system will be constructed to collect and transport all of the NCG emissions from the No. 3 MEE System to the No. 1 Bark Boiler for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o MEE System 3-07-001-03

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

Attachments to be Incorporated:

1. Buckeye's application package dated November 11, 1987, received November 12, 1987.
2. C. H. Fancy's letter dated December 11, 1987.
3. C. H. Fancy's letter dated December 22, 1987.
4. Buckeye's letter dated January 5, 1988, received January 15, 1988.
5. C. H. Fancy's letter dated January 22, 1988.
6. Buckeye's letter dated January 22, 1988, received January 26, 1988.
7. Buckeye's letter dated February 10, 1988, received February 12, 1988.
8. Technical Evaluation and Preliminary Determination dated March 22, 1988.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141920
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141920
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141920
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141920
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The No. 3 MEE System may operate continuously, i.e., 8760 hours/year.
2. The maximum total process input rate to the No. 3 MEE System shall not exceed 195,000 lbs/hr of Black Liquor Solids (BLS).

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141920
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The No. 3 MEE System is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 1 Bark Boiler, from which the exhaust gases shall not contain TRS in excess of 5 ppmvd corrected to 10% O₂, in accordance with FAC Rule 17-2.600(4)(c)6.
4. The No. 3 MEE System is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.
5. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.
6. Objectionable odors shall not be allowed off of plant property in accordance with FAC Rule 17-2.620(2).
7. In the event that a compliance test has to be performed on the No. 3 MEE System for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used.
8. Pursuant to FAC Rule 17-2.600(4)(c)1.d., the No. 3 MEE System is subject to the provisions of FAC Rule 17-2.960(1), Compliance Schedules, which requires that final compliance be demonstrated by the permittee by May 12, 1989.
9. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.
10. The No. 3 MEE System is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.
11. The No. 3 MEE System is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.
12. The DER's Northeast District office shall be notified in writing 15 days prior to source testing pursuant to FAC Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the NE District office within 45 days of test completion.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141920
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

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

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

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

15. The No. 1 Bark Boiler construction/operating permit(s) shall have a Specific Condition that it is the pollution control device for the No. 3 MEE System.

16. The No. 1 Bark Boiler shall be tested for TRS and SO₂ emissions after the No. 3 MEE System's TRS noncondensable gas handling system has been connected to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (greater than 100 TPY potential pollutant emissions) has already been received.

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 62-141921
Expiration Date: September 24, 1989
County: Taylor
Latitude/Longitude: 30° 03' 59"N
83° 33' 12"W
Project: No. 4 Multiple Effect
Evaporator System

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

For the permitting of the No. 1 Multiple Effect Evaporator (MEE) System, which includes the multiple effect evaporators and the associated condenser(s), hot well(s) and concentrator(s). A noncondensable gas (NCG) handling system will be constructed to collect and transport all of the NCG emissions from the No. 4 MEE System to the No. 1 Bark Boiler for incineration. The project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o MEE System 3-07-001-03

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

Attachments to be Incorporated:

1. Buckeye's application package dated November 11, 1987, received November 12, 1987.
2. C. H. Fancy's letter dated December 11, 1987.
3. C. H. Fancy's letter dated December 22, 1987.
4. Buckeye's letter dated January 5, 1988, received January 15, 1988.
5. C. H. Fancy's letter dated January 22, 1988.
6. Buckeye's letter dated January 22, 1988, received January 26, 1988.
7. Buckeye's letter dated February 10, 1988, received February 12, 1988.
8. Technical Evaluation and Preliminary Determination dated March 22, 1988.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141921
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141921
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141921
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141921
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The No. 4 MEE System may operate continuously, i.e., 8760 hours/year.
2. The maximum total process input rate to the No. 4 MEE System shall not exceed 260,000 lbs/hr of Black Liquor Solids (BLS).

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141921
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The No. 4 MEE System is subject to the total reduced sulfur (TRS) emission limiting standard pursuant to FAC Rule 17-2.600(4)(c)1.b., which is 5 ppmvd at standard conditions corrected to the actual oxygen content of the untreated flue gas stream as a 12-hour average, unless the TRS gases are combusted in the No. 1 Bark Boiler, from which the exhaust gases shall not contain TRS in excess of 5 ppmvd corrected to 10% O₂, in accordance with FAC Rule 17-2.600(4)(c)6.

4. The No. 4 MEE System is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan.

5. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

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

7. In the event that a compliance test has to be performed on the No. 4 MEE System for TRS emissions, EPA Method 16 or 16A pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used.

8. Pursuant to FAC Rule 17-2.600(4)(c)1.d., the No. 4 MEE System is subject to the provisions of FAC Rule 17-2.960(1), Compliance Schedules, which requires that final compliance be demonstrated by May 12, 1989.

9. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

10. The No. 4 MEE System is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

11. The No. 4 MEE System is subject to the provisions of FAC Rules 17-2.710(4), Quarterly Reporting Requirements, and 17-4.140, Reports.

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141921
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

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

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

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

15. The No. 1 Bark Boiler construction/operating permit(s) shall have a Specific Condition that it is the pollution control device for the No. 4 MEE System.

16. The No. 1 Bark Boiler shall be tested for TRS and SO₂ emissions after the No. 4 MEE System's TRS noncondensable gas handling system has been connected to it (see C. H. Fancy's letter dated January 22, 1988) and the system is operating properly (40 CFR 60.8). The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee pursuant to FAC Rule 17-4, of which \$1000.00 (greater than 100 TPY potential pollutant emissions) has already been received.

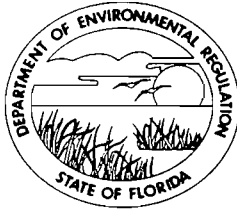
Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

PERMITTEE: Permit Number: AC 62-141922
The Buckeye Cellulose Corp. Expiration Date: September 24, 1989
Rt. 3, Box 260 County: Taylor
Perry, Florida 32347 Latitude/Longitude: 30° 03' 59"N
83° 33' 12"W
Project: Tall Oil Plant and
Control System

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

For the permitting of the Tall Oil Plant and the construction of a new wet scrubber control system (replacing the old one) to control pollutant emissions from the centrifugal feed tank, weir tank, degassifier tank, basket strainer and degassifier condenser. The scrubber system will use white liquor as the absorbing medium. The location of the project will be at the permittee's existing facility. The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Tall Oil Plant 3-07-001-99

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

Attachments to be Incorporated:

1. Buckeye's application package dated November 11, 1987, received November 12, 1987.
2. C. H. Fancy's letter dated December 11, 1987.
3. C. H. Fancy's letter dated December 22, 1987.
4. Buckeye's letter dated January 5, 1988, received January 15, 1988.
5. C. H. Fancy's letter dated January 22, 1988.
6. Buckeye's letter dated January 22, 1988, received January 26, 1988.
7. Buckeye's letter dated February 10, 1988, received February 12, 1988.
8. Technical Evaluation and Preliminary Determination dated March 22, 1988.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141922
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141922
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141922
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141922
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The Tall Oil Plant may operate continuously, i.e., 8760 hrs/yr.
2. The maximum production rate shall not exceed 14,583 lbs/hr of tall oil (dry and based on a total process input rate of 26,833 lbs/hr soap and black liquor and 9000 lbs/hr Sulfuric Acid).

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141922
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. In accordance with Florida Administrative Code (FAC) Rule 17-2.600(4)(c)2., total reduced sulfur (TRS) emissions from the Tall Oil Plant shall not exceed 0.05 lb/ton crude tall oil produced as a 12-hour average (0.37 lb/hr or 1.6 TPY). A scrubber shall be used to control TRS emissions continuously.

4. Initial and annual compliance tests shall be conducted using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

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

6. The permittee shall provide proof of final compliance to the DER's Northeast District office by May 12, 1989, pursuant to FAC Rule 17-2.960(1)(d)1.b.

7. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

8. Pursuant to FAC Rule 17-2.600(4)(c)2.b., the Tall Oil Plant is subject to the provisions of FAC Rule 17-2.710, Continuous Monitoring Requirements, which includes FAC Rules 17-2.710(3), General Requirements and Establishing Specific Surrogate Parameters, and 17-2.710(4), Quarterly Reporting Requirements. The source is subject to the provisions of FAC Rule 17-4.140, Reports.

9. The project is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

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

11. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit an application for an operating permit, including the application fee, along with the compliance test results, the

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141922
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

specific surrogate parameters to be monitored, and the Certificate of Completion, to the DER's Northeast District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date pursuant to FAC Rules 17-2 and 17-4.

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

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

13. The Tall Oil Plant is subject to the provisions of FAC Rule 17-2.971(2)(c), Compliance Schedules for Continuous Monitoring Requirements, which requires compliance by August 12, 1989.

Issued this _____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 62-141924
Expiration Date: September 24, 1989
County: Taylor
Latitude/Longitude: 30° 03' 59"N
83° 33' 12"W
Project: No. 2 Smelt Dissolving
Tank

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

For the permitting of the No. 2 Smelt Dissolving Tank (SDT) and the construction/installation of a new monitoring system for the existing scrubber system. The maximum total process input rate is 41,187 lbs/hr smelt (green liquor solids). The location of the project will be at the permittee's existing facility. The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Smelt Dissolving Tank 3-07-001-05

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

Attachments to be Incorporated:

1. Buckeye's application package dated November 11, 1987, received November 12, 1987.
2. C. H. Fancy's letter dated December 11, 1987.
3. C. H. Fancy's letter dated December 22, 1987.
4. Buckeye's letter dated January 5, 1988, received January 15, 1988.
5. C. H. Fancy's letter dated January 22, 1988.
6. Buckeye's letter dated January 22, 1988, received January 26, 1988.
7. Buckeye's letter dated February 10, 1988, received February 12, 1988.
8. Technical Evaluation and Preliminary Determination dated March 22, 1988.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141924
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141924
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141924
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141924
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The No. 2 Smelt Dissolving Tank (SDT) may operate continuously (i.e., 8760 hrs/yr).

2. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H₂S) shall not exceed 0.048 lb/3000 pounds black liquor solids (1.56 lbs/hr or 6.83 TPY and based on a permitted maximum processing capacity of 97,600 lbs/hr black liquor solids (BLS) in the No. 2 Recovery Boiler (RB) - equivalent to 41,187 lbs/hr green liquor solids (GLS)).

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141924
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The maximum PM mass allowable emissions shall not exceed 23.4 lbs/hr or 102.5 TPY. These limits are based on the process capacity of 41,187 lbs/hr smelt, and in accordance with FAC Rule 17-2.610(1).

4. Visible emissions shall be less than 20% opacity in accordance with FAC Rule 17-2.610(2).

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

6. Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC 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
- c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

7. The permittee shall provide proof of compliance with FAC Rule 17-2.960(1), by May 12, 1989, to the DER's Northeast District office.

8. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

9. Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the No. 2 SDT is subject to the provisions of FAC Rules 17-2.710(3)(d), Establishing Specific Surrogate Parameters, and 17-2.710(4), Quarterly Reporting Requirements. The No. 2 SDT is subject to the provisions of FAC Rule 17-4.140, Reports.

10. The No. 2 SDT is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141924
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

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

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

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

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

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

Issued this ____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

PERMITTEE: Permit Number: AC 62-141925
The Buckeye Cellulose Corp. Expiration Date: September 24, 1989
Rt. 3, Box 260 County: Taylor
Perry, Florida 32347 Latitude/Longitude: 30° 03' 59"N
83° 33' 12"W
Project: No. 3 Smelt Dissolving
Tank

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

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

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Smelt Dissolving Tank 3-07-001-05

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

Attachments to be Incorporated:

1. Buckeye's application package dated November 11, 1987, received November 12, 1987.
2. C. H. Fancy's letter dated December 11, 1987.
3. C. H. Fancy's letter dated December 22, 1987.
4. Buckeye's letter dated January 5, 1988, received January 15, 1988.
5. C. H. Fancy's letter dated January 22, 1988.
6. Buckeye's letter dated January 22, 1988, received January 26, 1988.
7. Buckeye's letter dated February 10, 1988, received February 12, 1988.
8. Technical Evaluation and Preliminary Determination dated March 22, 1988.

PERMITTEE:
The Buckeye Cellulose Corp.

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

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

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

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

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

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The No. 3 Smelt Dissolving Tank (SDT) may operate continuously (i.e., 8760 hrs/yr).
2. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H₂S) shall not exceed 0.048 lb/3000 pounds black liquor solids (1.32 lbs/hr or 5.76 TPY and based on a permitted maximum processing capacity of 82,350 lbs/hr black liquor solids (BLS) in the No. 3 Recovery Boiler (RB) - equivalent to 34,752 lbs/hr green liquor solids (GLS)).

PERMITTEE:
The Buckeye Cellulose Corp.

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

SPECIFIC CONDITIONS:

3. The maximum PM mass allowable emissions shall not exceed 21.1 lbs/hr or 92.4 TPY. These limits are based on the process capacity of 34,752 lbs/hr smelt, and in accordance with FAC Rule 17-2.610(1).

4. Visible emissions shall be less than 20% opacity in accordance with FAC Rule 17-2.610(2).

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

6. Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC 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
- c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

7. The permittee shall provide proof of compliance with FAC Rule 17-2.960(1), by May 12, 1989, to the DER's Northeast District office.

8. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

9. Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the No. 3 SDT is subject to the provisions of FAC Rules 17-2.710(3)(d), Establishing Specific Surrogate Parameters, and 17-2.710(4), Quarterly Reporting Requirements. The No. 3 SDT is subject to the provisions of FAC Rule 17-4.140, Reports.

10. The No. 3 SDT is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

PERMITTEE:
The Buckeye Cellulose Corp.

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

SPECIFIC CONDITIONS:

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

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

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

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

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

Issued this ____ day of _____,
19__.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 62-141926
Expiration Date: September 24, 1989
County: Taylor
Latitude/Longitude: 30° 03' 59"N
83° 33' 12"W
Project: No. 4 Smelt Dissolving Tank

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

For the permitting of the No. 4 Smelt Dissolving Tank (SDT) and the construction/installation of a new monitoring system for the existing scrubber system. The maximum total process input rate is 52,254 lbs/hr smelt (green liquor solids). The location of the project will occur at the permittee's existing facility. The UTM coordinates are Zone 17, 256.7 km East and 3328.7 km North.

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Smelt Dissolving Tank 3-07-001-05

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

Attachments to be Incorporated:

1. Buckeye's application package dated November 11, 1987, received November 12, 1987.
2. C. H. Fancy's letter dated December 11, 1987.
3. C. H. Fancy's letter dated December 22, 1987.
4. Buckeye's letter dated January 5, 1988, received January 15, 1988.
5. C. H. Fancy's letter dated January 22, 1988.
6. Buckeye's letter dated January 22, 1988, received January 26, 1988.
7. Buckeye's letter dated February 10, 1988, received February 12, 1988.
8. Technical Evaluation and Preliminary Determination dated March 22, 1988.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141926
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141926
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141926
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141926
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The No. 4 Smelt Dissolving Tank (SDT) may operate continuously (i.e., 8760 hrs/yr).
2. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H₂S) shall not exceed 0.048 lb/3000 pounds black liquor solids (1.98 lbs/hr or 8.67 TPY and based on a permitted maximum processing capacity of 123,825 lbs/hr black liquor solids (BLS) in the No. 4 Recovery Boiler (RB) - equivalent to 52,254 lbs/hr green liquor solids (GLS)).

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141926
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The maximum PM mass allowable emissions shall not exceed 27.1 lbs/hr or 118.7 TPY. These limits are based on the process capacity of 52,254 lbs/hr smelt, and in accordance with FAC Rule 17-2.610(1).

4. Visible emissions shall be less than 20% opacity in accordance with FAC Rule 17-2.610(2).

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

6. Initial and annual compliance tests shall be conducted using the following test methods in accordance with FAC 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
- c) EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources

7. The permittee shall provide proof of compliance with FAC Rule 17-2.960(1), by May 12, 1989, to the DER's Northeast District office.

8. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

9. Pursuant to FAC Rule 17-2.710, Continuous Monitoring Requirements, the No. 4 SDT is subject to the provisions of FAC Rules 17-2.710(3)(d), Establishing Specific Surrogate Parameters, and 17-2.710(4), Quarterly Reporting Requirements. The No. 4 SDT is subject to the provisions of FAC Rule 17-4.140, Reports.

10. The No. 4 SDT is subject to the provisions of FAC Rules 17-2.240, Circumvention, 17-2.250, Excess Emissions, and 17-4.130, Plant Operation-Problems.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141926
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

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

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

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

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

14. The No. 4 SDT is subject to the provisions of FAC Rule 17-2.971(2)(c), Compliance Schedules for Continuous Monitoring Requirements, which requires compliance by August 12, 1989.

Issued this ____ day _____,
19__.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

Dale Twachtman, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

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

Permit Number: AC 62-141927
Expiration Date: September 24, 1989
County: Taylor
Latitude/Longitude: 30° 03' 59"N
83° 33' 12"W
Project: No. 1 Bark Boiler

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

For the construction of a noncondensable gas (NCG) collection and transport system for TRS gases from the Nos. 1, 2, 3 and 4 Multiple Effect Evaporator Systems, and the Nos. 1 and 2 Batch Digesting Systems and associated Turpentine Recovery System, to the No. 1 Bark Boiler for incineration. The boiler air and flue gas system will be modified to prevent corrosion. A new corrosion resistant mist eliminator and a pH control system will be installed in the existing venturi scrubber. A backup scrubber will be constructed to minimize TRS emissions in emergencies where the No. 1 Bark Boiler is not adequately operative. The UTM coordinates of the existing facility are Zone 17, 256.7 km East and 3328.7 km North.

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

The Standard Industrial Codes are: Industry No. 2621-Paper Mills
The Standard Classification Codes are:

1. Major Group 49: External Combustion Boilers
 - o Wood/Bark Waste 1-02-009-02 (tons burned)

ATTACHMENTS

AC 62-141927

Attachments to be Incorporated:

1. Buckeye's application package dated November 11, 1987, received November 12, 1987.
2. C. H. Fancy's letter dated December 11, 1987.
3. C. H. Fancy's letter dated December 22, 1987.
4. Buckeye's letter dated January 5, 1988, received January 15, 1988.
5. C. H. Fancy's letter dated January 22, 1988.
6. Buckeye's letter dated January 22, 1988, received January 26, 1988.
7. Buckeye's letter dated February 10, 1988, received February 12, 1988.
8. Bruce Mitchell's Interoffice Memo dated March 18, 1988.
9. Technical Evaluation and Preliminary Determination dated March 22, 1988.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141927
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141927
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141927
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141927
Expiration Date: Sept. 24, 1989

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. This permit for the No. 1 Bark Boiler shall supercede previous permits issued only to the extent of the changes due to the additional TRS noncondensable gas incineration system.
2. The No. 1 Bark Boiler may operate continuously, i.e., 8760 hours/year.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141927
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

3. The maximum heat input rate shall not exceed 300 MMBtu/hr from any combination of the fuels wood waste, No. 6 fuel oil and TRS gases. Projected wood waste utilization rate is 23.5 tons per hour (30% moisture).

4. The No. 6 fuel oil utilization rate shall not exceed 1644 gals/hr (240 MMBtu/hr). The sulfur content of the fuel oil shall not exceed 2.5% by weight.

5. TRS gases from the Nos. 1, 2, 3, and 4 MEE Systems and the Nos. 1 and 2 Batch Digesting Systems shall be collected and transported to and incinerated in the No. 1 Bark Boiler for a minimum of 0.5 seconds and 1200 °F.

6. A continuous temperature monitor shall be installed, calibrated and operated in accordance with FAC Rule 17-2.710.

7. The No. 1 Bark Boiler emissions shall not exceed:

- a) TRS: 5 ppmvd at standard conditions @ 10% O₂, 12-hr avg.
(2.26 lbs/hr, 10.1 TPY)
- b) SO₂: 1449 lbs/hr, 6346 TPY
- c) PM : o wood waste fired: 47.3 lbs/hr, 207 TPY
o fuel oil fired: 24.0 lbs/hr, 105 TPY
- d) VE : maximum of 30% opacity, except 40% for 2 mins/hr

Note: Fly ash and SO₂ are controlled by a wet scrubber with projected removal efficiencies of 93% and 40%, respectively. A cyclone collector system precedes the scrubber.

8. Initial and annual compliance tests shall be conducted in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A:

- a) EPA Method 5 for particulate emissions
- b) EPA Method 6 for sulfur dioxide emissions
- c) EPA Method 9 for visible emissions
- d) EPA Method 16 or 16A for TRS emissions

Other EPA approved test methods may be used only after prior Departmental approval.

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141927
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

9. The No. 1 Bark Boiler is subject to the provisions of FAC Rule 17-2.600(4)(c)1.c., which includes the requirement of establishing a contingency plan, part of which includes the proposed back-up scrubber which shall be used to scrub TRS gases while the No. 1 Bark Boiler is not adequately operative.

10. The No. 1 Bark Boiler is subject to the provisions of FAC Rules 17-4.130 Plant Operation-Problems, 17-4.140 Reports, 17-2.240 Circumvention, 17-2.250 Excess Emissions, and 17-2.710(4), Quarterly Reporting Requirements.

11. For the Nos. 1, 2, 3 and 4 MEE Systems and Nos. 1 and 2 Batch Digesting Systems, the permittee shall provide proof of final compliance to the DER's Northeast District office by May 12, 1989, pursuant to FAC Rule 17-2.960(1)(d)1.b.

12. The project shall comply with all applicable provisions of FAC Rules 17-2 and 17-4.

13. All process equipment shall be inspected regularly and maintained in good operating condition to minimize fugitive gaseous emissions.

14. Objectionable odors shall not be allowed off of the plant property pursuant to FAC Rule 17-2.620(2).

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

16. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction and achieve final compliance on schedule, the DER's Bureau of Air Quality Management (BAQM) office and Northeast District office must be notified in writing 60 days prior to the final compliance date of the construction permit and the permittee shall submit appropriate information pursuant to FAC Rule 17-2.960(1)(e).

17. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including

PERMITTEE:
The Buckeye Cellulose Corp.

Permit Number: AC 62-141927
Expiration Date: Sept. 24, 1989

SPECIFIC CONDITIONS:

the application fee, along with compliance test results and Certificate of Completion, to the DER's Northeast District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date pursuant to FAC Rules 17-2 and 17-4.

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

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

19. The No. 1 Bark Boiler shall be tested for TRS and SO₂ 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 complete destruction of the pollutant. The SO₂ emissions test, using EPA Method 6 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A, shall be used to establish the overall removal efficiency of the No. 1 Bark Boiler. The results will be used to rule out or require further emissions review pursuant to FAC Rule 17-2.500, PSD, and to assess the appropriate processing fee(s) pursuant to FAC Rule 17-4 for the NCG handling system's associated sources and the No. 1 Bark Boiler.

Issued this _____ day _____,
19__.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

Dale Twachtmann, Secretary

ATTACHMENT 1
(Available Upon Request)

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ATTACHMENT 2

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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

December 11, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Sipple:

Re: Completeness Review of Applications to Construct
AC 62-141916, -141917, -141918, -141919, -141920, -141921,
-141922, -141923, -141924, -141925, -141926 and -141927

The Department received your cover letter and above referenced applications, dated November 11, 1987, on November 12, 1987. Based on a technical review of these applications, they have been deemed incomplete. Therefore, please submit to the DER's Bureau of Air Quality Management (BAQM) office, including all assumptions, calculations and reference material, the following information so their status can, again, be ascertained:

1. For reference purposes, the assigned permit numbers and sources are:
AC 62-141916 No. 1 Digester System
-141917 No. 2 Digester System
-141918 No. 1 Multiple Effect Evaporator (MEE) System
-141919 No. 1 MEE System
-141920 No. 2 MEE System
-141921 No. 3 MEE System
-141922 No. 4 MEE System
-141923 Tall Oil Plant
-141924 No. 2 Smelt Dissolving Tank (SDT)
-141925 No. 3 SDT
-141926 No. 4 SDT
-141927 No. 1 Bark Boiler

2. In Table VII-1, A. Emission Inventory, the annual operating hours for the Nos. 1, 2 and 3 lime kilns are specified as 8760. Since credit for these sources can only be in the form

Mr. J. L. Sipple
Page Two
December 11, 1987

of contemporaneous, which is defined pursuant to Florida Administrative Code (FAC) Rule 17-2.500(2)(e), the hours of operation should be as they were represented in the application for the No. 4 lime kiln construction permit (AC 62-107858; see the application page C-1, Attachment C, Emission Calculation Existing Sources to be Shutdown). Please explain the discrepancies.

2. Submit an application with the appropriate fee (to be based on potential emissions) to the DER's BAQM office for the scrubber system that is to be the back-up control system to the No. 4 lime kiln and was identified in the TRS contingency plan. The hours of operation should be based on the maximum time allotted by FAC Rule 17-2, which is 10 days, unless an extension is granted by the Secretary or the Secretary's designee.

Therefore,

$$\begin{aligned} \text{Maximum Operating Hours} &= 240 \text{ hours} \\ \text{--- lbs/hr TRS} \times 240 \text{ hrs} \div 2000 \text{ lbs/ton} &= \text{--- TPY TRS} \\ \text{--- TPY TRS} \times (1 - \text{Efficiency}) &= \text{--- TPY TRS potential} \end{aligned}$$

3. Submit the complete modeling output for the sources modeled.
4. Submit a visibility analysis for the Saint Marks National Wildlife Refuge PSD (prevention of significant deterioration) Class I Area.
5. Since September 24, 1976, has there been any physical change to or change in the method of operation to any of the sources in the above referenced applications? Please document any change(s) and their associated cost(s).
6. The requested maximum capacity of each of the SDTs are less than their capacities requested in construction permit AC 62-107857 and the proposed modification in AC 62-140034. Please explain the discrepancies and amend the appropriate applications. Also, for the 5 years prior to the issuance of the permit AC 62-107857, please submit the maximum hourly and daily and annual total process input rate and product weight

Mr. J. L. Sipple
Page Three
December 11, 1987

of green liquor solids processed in each SDT (Nos. 2, 3, and 4). Also, what was the pumping rate(s) of each of the green liquor solids pumps that were replaced in the above referenced project (AC 62-107857)?.

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

Sincerely,



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

CHF/BM/ks

cc: B. Stewart, NE Dist
B. Pittman, Esq.
R. Andreu, BCC
A. M. Kinghorn, P.E., SEC, Inc.

corrected copy

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

December 11, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Sipple:

Re: Completeness Review of Applications to Construct
AC 62-141916, -141917, -141918, -141919, -141920, -141921,
-141922, -141924, -141925, -141926 and -141927

The Department received your cover letter and above referenced applications, dated November 11, 1987, on November 12, 1987. Based on a technical review of these applications, they have been deemed incomplete. Therefore, please submit to the DER's Bureau of Air Quality Management (BAQM) office, including all assumptions, calculations and reference material, the following information so their status can, again, be ascertained:

1. For reference purposes, the assigned permit numbers and sources are:

AC 62-141916	No. 1 Digester System
-141917	No. 2 Digester System
-141918	No. 1 Multiple Effect Evaporator (MEE) System
-141919	No. 2 MEE System
-141920	No. 3 MEE System
-141921	No. 4 MEE System
-141922	Tall Oil Plant
-141924	No. 2 Smelt Dissolving Tank (SDT)
-141925	No. 3 SDT
-141926	No. 4 SDT
-141927	No. 1 Bark Boiler

2. In Table VII-1, A. Emission Inventory, the annual operating hours for the Nos. 1, 2 and 3 lime kilns are specified as 8760. Since credit for these sources can only be in the form

ATTACHMENT 3

62-141917

12-14-1987

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

December 22, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Sipple:

Re: Air Pollution Sources Requiring Construction Permit(s)

In the discussion of your November 12, 1987 submittal about the noncondensable gas transport and incinerator system on page VI-132, 3rd paragraph, there is described a "separator for removal of condensate", which is associated with the evaporator hot wells and the digester blow heat recovery system. Is this system a "condensate stripper system", pursuant to 40 CFR 60.281(o) and subject to the new source performance standards for kraft pulp mills? If it is, please submit an application along with the appropriate fee to the Department's Bureau of Air Quality Management. If it is not, please submit additional details and descriptions to support your contention. If appropriate, its pollutant emissions should be incorporated into the ambient air quality standards (AAQS) analysis and the increment analysis.

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

Sincerely,

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

CHF/ks

- cc: B. Stewart, NE District
- B. Pittman, Esq.
- A. M. Kinghorn, P.E., SEC, Inc.
- R. Andreu, BCC

ATTACHMENT 4

First in cellulose



1-13-88
Perry, FL
The Buckeye
Cellulose Corporation

A Procter and Gamble Company

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

FILE 4027
DER

JAN 15 1988

BAQM

January 5, 1988

Mr. Clair H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Completeness Review of Applications to Construct
AC62-141916, -141917, -141918, -141919, -141920,
-141921, -141922, -141924, -141925, -141926,
and -141927

Dear Mr. Fancy:

This is to respond to your letter dated 12/11/87, which requested additional information regarding the above referenced construction permit applications. The following responses have been keyed to correspond to each question contained in your letter. Since your 12/11/87 letter included two questions shown as No. 2, we have used references 2A and 2B, sequentially.

Question No. 2A

Our ambient air quality (AAQ) modeling strategy was to simulate worst case conditions (ie: maximum permitted rates) for all sources versus actual conditions, to insure that the AAQ and the increment would be protected. Since these sources are not subject to PSD review, as per our previous workshop agreements and written department statements, we felt that this approach would satisfy the Department's AAQ concerns while protecting our existing permitted rates and operating flexibility. The fact is that this approach yielded higher potential annual emissions, than had we used actual conditions, which represents a more stringent test.

Question No. 2B

First of all, as stated in our applications, we plan to incinerate the TRS gases in the No. 1 bark boiler, -- not the No. 4 lime kiln. We do not believe that an application is necessary for the proposed contingency scrubber because it is not a source [See Source as defined in 17-2.100(177)]. The digesting systems and the multiple effect evaporators are the sources and applications have been submitted for them. In addition, the proposed scrubber will decrease potential emissions during periods when the No. 1 bark boiler is unavailable for TRS gas incineration.

Question No. 3

The complete modeling outputs for the sources modeled are contained in Appendix C of the applications package submitted on 11/12/87.

Question No. 4

Since these sources are not subject to PSD review, as per previous workshop agreements and written department statements, this question is not applicable. In addition, since the issue is strictly an SO₂ issue, a visibility analysis appears inappropriate.

Question No. 5

As defined in 17-2.100(119), FAC, all physical and operational changes (since the date specified) have been included in Table VII-1A (Emission Inventory) of the TRS construction permit applications package and Attachment C & D of the No. 4 lime kiln construction permit application.

Question No. 6

First of all, maximum capacities for the SDT's were not requested as part of AC62-107857 and AC62-140034. These two applications were for the Causticizing system, which is independent from the operation of the SDT's. The SDT rates being requested in the TRS Control Project applications represent the necessary rates and are consistent with the existing SDT operating permits.

The remaining inquiries included in Question No. 6 are not relevant to the SDT TRS Control Project applications.

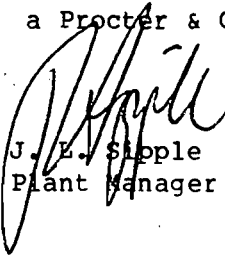
We continue to be significantly concerned in regard to the basis for the questions contained in your 12/11/87 letter (ie: PSD applicability). As you are aware, to address these concerns the Florida Pulp & Paper Association has scheduled a meeting with the DER leadership for late January. In addition, we have also requested an extension of time to file for an administrative hearing on these issues, in the event that they cannot be mutually resolved.

These follow-up actions were believed to be necessary to minimize any further unnecessary delays in the permit approval process, which could jeopardize compliance with the numerous upcoming deadlines (ie: equipment order certification, construction start certification, etc.).

We believe that the information that has been submitted is appropriate to allow a complete review of the above referenced applications. However, if you have any further questions, please contact Ray Andreu at (904) 584-0347.

Very truly yours,

THE BUCKEYE CELLULOSE CORPORATION
a Procter & Gamble Company


J. L. Shiple
Plant Manager

JLS/RA:msw
3120L

B. Stewart }
B. Mitchell } 1-15-88 RAL
M. Linn
P. Raval

ATTACHMENT 5

File Copy

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

January 22, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. J. L. Sipple, Plant Mgr.
The Buckeye Cellulose Corp.
Route 3, Box 260
Perry, Florida 32347

Dear Mr. Sipple:

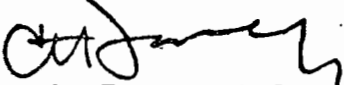
Re: Pre and Post Test to Establish SO₂ Control Efficiencies

It has become apparent in the review of the various permit applications received regarding the TRS NCG systems that the selected combustion devices and their associated control efficiencies for sulfur dioxide (SO₂) are not established. Therefore, a pre and post test will be required to establish the SO₂ removal efficiency of each combustion device (e.g. lime kiln), which is currently operating and in which TRS emissions are proposed to be incinerated.

It is advised that you perform the pre-test at your next earliest convenience (e.g. annual compliance test). Please submit the test data to the Department's Bureau of Air Quality Management to review and to document the results for the file.

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

Sincerely,


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

CHF/PR/s

cc: S. Smallwood
J. Brown
B. Thomas
B. Pittman
M. Zilberberg
B. Stewart

ATTACHMENT 6

First in cellulose



12-21
The Buckeye
Cellulose Corporation

A Procter and Gamble Company

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

January 22, 1988

Mr. Clair H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

DER
JAN 26
BAQM

Re: TRS Control Project Air Construction Permit Applications
— Noncondensable Gas Transport Separator

Dear Mr. Fancy:

This is to respond to your letter dated 12/22/87, which requested additional information on the separator which is part of the proposed noncondensable gas transport equipment. Although the completeness review period has expired, we are submitting this response as a courtesy.

The separator discussed in the application package on page VI-132, 3rd paragraph and shown in figure VI-5, is not a "condensate stripper system" as defined in 40 CFR 60.281(o).

"Condensate stripper system means a column, and associated condensers, used to strip, with air or steam, TRS compounds from condensate streams from various processes within a kraft pulp mill."

Contrary to the above referenced definition, the function of the proposed separator is to remove condensed moisture from the noncondensable gases prior to incineration in the No. 1 bark boiler. This is necessary to assure safe boiler operation and good combustion of the noncondensable gases. During transport to incineration, gases saturated with moisture from the digesting systems' blows and the multiple effect evaporator hotwells will cool allowing water vapor to form droplets. The separator function is much like a steam trap, i.e. to drop out entrained moisture droplets. It contains no internal moving parts, instrumentation process controls, nor any energy inputs. The removal of this condensed moisture will help maintain stable combustion of the gases in the boiler and help reduce any boiler upsets that might result if excessive water entered the boiler through the noncondensable gas nozzle. Typical quantities of separated condensate are expected to be small, several gallon per minute.

We believe this information is sufficient to correct the apparent misunderstanding. However, if you have any further questions on this subject, please contact Julia Wood at (901) 320-8458 or Ray Andreu at (904) 584-0347.

Very truly yours,

THE BUCKEYE CELLULOSE CORPORATION
a Procter & Gamble Company

J. L. Sipple
Plant Manager

Attachment 7

Jul Copy

2-11-88
Perry, FL

First in cellulose



The Buckeye Cellulose Corporation

A Procter and Gamble Company

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

DER

February 10, 1988

FEB 12

BAQM

Mr. Clair H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Completeness Review of TRS Project Construction Permit Applications

Dear Mr. Fancy:

This is in response to the 2/10/88 phone conversation with Mr. Bruce Mitchell, during which we agreed to provide further clarification to our previous response to question #5 in the incompleteness letter, dated 12/11/87. As a result, the following is intended to satisfy Mr. Mitchell's request:

Since September 24, 1976, there have been no physical changes to or changes in the method of operation [as defined in 17-2.100 (118), FAC] to any of the sources in the referenced applications.

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

Very truly yours,

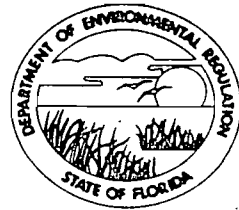
THE BUCKEYE CELLULOSE CORPORATION
a Procter & Gamble Company

R. Andreu
Environmental Control Manager

RA:msw
3202L

Copy: Bill Stewart - WEDist
Bruce Mitchell
CHFIBT } 2-12-88 (M)

ATTACHMENT 8



Interoffice Memorandum

TO: Main File: AC 62-141927
FROM: Bruce Mitchell *BM*
DATE: March 18, 1988
SUBJ: Calculation of TRS Limits From the Emission Limiting Standard

For Routing To Other Than The Addressee

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

Based on stack test parameters received today via phone from Mr. Ray Perry, with The Buckeye Cellulose Corporation, the TRS emission limits are calculated:

Parameters:
100,000 acfm
7.3% O₂
21.5% H₂O
145° F

Standard: 5ppmvd @ standard conditions @ 10% O₂

Correction for O₂:
 $(21-10)/(21-7.3) = 0.803$
5 ppm/0.803 = 6.23 ppm

Correction for H₂O:
100,000 acfm x (1-0.215) = 78,500 dcfm

Therefore,
PV = mRT
m = PV/RT

$m = (14.7 \times 144) \text{ lbf/ft}^2 \times 78,500 \text{ dcfm} \times \text{lbf-R}^\circ / 45.44 \text{ ft-lbf} \times 1 / (460 + 145) \text{ R}^\circ \times 60 \text{ min/hr} \times 6.23 \text{ ppm} / 10^6 = 2.26 \text{ lbs/hr}$
as H₂S

2.26 x 4.38 = 10.07 TPY