




State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

RECEIVED
JUN 7 1991

TO: Carol Browner

FROM: Steve Smallwood 

DATE: June 4, 1991

Office of the Secretary
RECEIVED

JUN 11 1991

Division of Air
Resources Management

SUBJ: Approval of Construction Permits Nos. AC 54-192550
AC 54-192551
AC 54-193841
PSD-FL-171

Georgia-Pacific Corporation

Attached for your approval and signature are construction permits prepared by the Bureau of Air Regulation for the above mentioned company to construct/modify the Nos. 4 Recovery Boiler, Lime Kiln and Smelt Dissolving Tank, at their facility in Palatka, Putnam County, Florida.

Comments were received during the public notice period and are addressed in the Final Determination.

Day 90, after which the permit would be issued by default, is July 17, 1991.

I recommend your approval and signature.

CHF/m

attachments

Bowie's Copy



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMITS

Mr. Henry Hirschman
V.P. & General Manager
Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32034

June 11, 1991

Enclosed are construction permits AC 54-192550, -192551 and -193841 & PSD-FL-171 for Georgia-Pacific Corporation to construct/modify the Nos. 4 Recovery Boiler, Lime Kiln and Smelt Dissolving Tank, respectively, at their facility in Palatka, Putnam County, Florida. These permits are issued pursuant to Section 403, Florida Statutes.

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

CHF/bm

Enclosure

Copy furnished to:

A. Kutyna, NE District
D. Buff, P.E., KBN

V. Adams, G-PC
J. Harper, EPA

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMITS

In the matter of an
Application for Permits by:

Georgia-Pacific Corporation
P. O. Box 919
Palatka, Florida 32078-0919

DER File No. AC 54-192550
AC 54-192551
AC 54-193841
PSD-FL-171
Putnam County

Enclosed are Permit Numbers AC 54-192550, 54-192551, 54-193841, and PSD-FL-171 to construct/modify the No. 4 Recovery Boiler, No. 4 Lime Kiln, and No. 4 Smelt Dissolving Tank at Georgia-Pacific Corporation's facility in Palatka, Putnam County, Florida, issued pursuant to Section(s) 403, Florida Statutes.

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

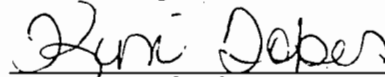
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMITS and all copies were mailed before the close of business on 6-12-91 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT

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


(Clerk)

6-12-91
(Date)

Copies furnished to:
J. Harper, EPA
A. Kutyna, NED
D. A. Buff, P.E., KBN
V. L. Adams, G-PC

Final Determination

Georgia-Pacific Corporation
Putnam County
Palatka, Florida

Construction Permit Numbers:

AC 54-192550
AC 54-192551
AC 54-193841
PSD-fl-171

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

June 5, 1991

Final Determination

The Technical Evaluation and Preliminary Determination (TE&PD) for the construction permits to construct/modify the Nos. 4 Recovery Boiler, Lime Kiln and Smelt Dissolving Tank, at Georgia-Pacific Corporation's (G-PC) facility in Palatka, Putnam County, Florida, was distributed on April 22, 1991. The Notice of Intent to Issue was published in The Palatka Daily News on April 24, 1991. Copies of the TE&PD were available for public inspection at the Department's Northeast District office and Bureau of Air Regulation office.

A comment was received in a letter from Ms. Jewell A. Harper (EPA) on May 13, 1991. Comments were received in a letter from Mr. Vernon L. Adams (G-PC) on May 29, 1991, and by phone on June 4, 1991. Also, it is noted that a transcription error occurred on the assigned construction permit numbers and, instead of Nos. AC 54-192250 (No. 4 Recovery Boiler) and AC 54-192251 (No. 4 Lime Kiln), the correct numbers should have been Nos. AC 54-192550 and AC 54-192551, respectively, and will be corrected. The Department's responses to the comments will follow:

A. Comment from Ms. Jewell A. Harper

1. The comment stated that EPA concurred with the proposed determination.

Response:

None required.

B. Comments from Mr. Vernon L. Adams

1. AC 54-192550: No. 4 Recovery Boiler

a. Regarding Specific Condition No. 5 and based on the fact that there was a netting-out affect on SO₂ emissions, the No. 4 Recovery Boiler should be granted a SO₂ emission limit of 109.9 lbs/hr per the application.

Response:

The Department agrees with the request and the 109.9 lbs/hr (481.4 TPY) allowable SO₂ emission limit will be used for compliance purposes. However, it shall be noted that actual SO₂ emissions will be used for future PSD (Prevention of Significant Deterioration) evaluations. Therefore, the following will be changed:

Specific Condition No. 5.:

From: Sulfur dioxide (SO₂) emissions shall not exceed 37.5 ppmvd, corrected to 8% O₂ (109.9 lbs/hr; 481.4 TPY).

To: Sulfur dioxide (SO₂) emissions shall not exceed 109.9 lbs/hr (481.4 TPY).

2. AC 54-192551: No. 4 Lime Kiln

a. G-PC requests that a compliance time frame (i.e., 24-hr average) be placed on the pollutant limits for NO_x and CO.

Response:

The Department feels that setting a compliance time frame to be inappropriate and, in accordance with 40 CFR 60 and F.A.C. Rule 17-2.700, will specify that each test run shall be conducted for the time and under the conditions specified in the applicable standard. Therefore, there will be no change made to the proposed permit conditions.

3. AC 54-192550 and -192551

a. Based on a phone call discussion, G-PC desires the use of EPA Method 7E instead of EPA Method 7, which was proposed in Specific Condition No. 8.d. of the draft permits. The Department has no objection to this request and the following will be changed:

Specific Condition No. 8.d.:

From: The initial and annual compliance tests for NO_x shall be conducted using EPA Method 7, Determination of Nitrogen Oxide Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

To: The initial and annual compliance tests for NO_x shall be conducted using EPA Method 7E, Determination of Nitrogen Oxide Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

Attachments to be Incorporated:

A. AC 54-192550 and -192551

9. Ms. Jewell A. Harper's letter received May 13, 1991.

10. Mr. Vernon L. Adam's letter received May 29, 1991.

B. AC 54-193841

9. Ms. Jewell A. Harper's letter received May 13, 1991.

The final action of the Department will be to issue the construction permits, Nos. AC 54-192550, -192551 and -193841 & PSD-FL-171, as proposed and with the above changes and attachments incorporated.



Georgia-Pacific Corporation Palatka Operations
 Southern Pulp & Paper Division
 P.O. Box 919
 Palatka, Florida 32078-0919
 Telephone (904) 325-2001

RECEIVED

April 30, 1991

Division of Air Resources Management

Certified Mail

Mr. Bruce Mitchell
 Florida Department of
 Environmental Regulation
 2600 Blair Stone Road
 Tallahassee, Florida 32399-2400

4
 copies

Dear Mr. Mitchell:

Please find attached a certifi-
 notice relating to the PSD permits
 Recovery Boiler.

ic
 id #4

If you have any questions or if I can be of further
 service, please call me at 904-325-2001.

Sincerely,

Vernon L. Adams
 Superintendent of
 Environmental Affairs

- cc: A. Beshire
- D. Buff
- D. Hodges
- H. Hirschman
- W. R. Wilson

A. Kutyna, PE, Dist.
C. Holladay
J. Harper, EPE

PUBLIC NOTICE

State of Florida
Department of Environmental
Regulation

Notice of Intent to Issue
The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Georgia-Pacific Corporation, P.O. Box 919, Palatka, Florida 32078-0919, to modify/enhance the No. 4 Recovery Boiler (RB) and the No. 4 Lime Kiln, which have the potential to increase the through-put rates of raw materials and the potential pollutant emissions. An increase in black liquor solids burning in the No. 4 RB will, therefore, increase the smelt through-put rate and the potential pollutant emissions of the No. 4 Smelt Dissolving Tanks (North and South units). The proposed modification is subject to new source review for Prevention of Significant Deterioration (PSD) for the pollutants PM (particulate matter), PM10, NOx (nitrogen oxides), CO (carbon monoxide), and VOC (volatile organic compounds). There is a decrease in overall particulate emissions from the PSD baseline period. Therefore, no Class I or Class II particulate matter PSD increment will be consumed by this project. A determination of Best Available Control Technology (BACT) was required. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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

The Petition shall contain the following information:
(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
(c) A statement of how each

petitioner's substantial interests are affected by the Department's action or proposed action;

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

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

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

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

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

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

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Department of Environmental Regulation
Northeast District Office
7825 Baymeadows Way
Jacksonville, Florida 32256-7577

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination.

A public hearing can be requested by any person. Such request must be submitted within 30 days of this notice.
Apr 24, 1991

STATE OF FLORIDA
County of Putnam

SS:

Personally appeared before me, a Notary Public for the State of Florida at
Joyce Guthrie
Business Office Manager
of The Palatka Daily News,
a newspaper printed in the English Language and of general circulation, published in the City of Palatka, in said County and State; and that the attached order, publication and/or advertisement of NOTICE OF INTENT TO
ISSUE PERMIT

The Palatka Daily News, Inc.
published in said newspaper
period of One Insertion consecutively,
beginning April 24, 1991 and ending April 24, 1991
publication being made on the following dates:
April 24, 1991

The deponent further says that The Palatka Daily News has been continuously published as a daily newspaper, and has been entered as second class mail matter at postoffice at the City of Palatka, Putnam County, Florida, each for a period of more than one year next preceding the date of the first publication of the above described order, notice, publication and/or advertisement.

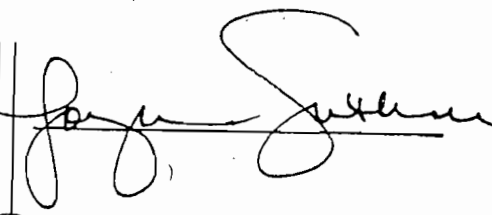
Subscribed and sworn to before me this

day of April, A.D. 19 91

Robert Spromond

Notary Public
State of Florida at Large
My Commission Expires March 17, 1992

1471



ATTACHMENT 9



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED
MAY 10 1991
Division of Air
Resources Management

4APT-AEB

MAY 10 1991

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

RE: Georgia-Pacific Corporation, Palatka (PSD-FL-171)

Dear Mr. Fancy:

This is to acknowledge receipt of your preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the above referenced facility transmitted by your letter of April 22, 1991. We have reviewed the package as requested and have the following comments.

We concur with your determination that a PM limit of 0.033 gr/dscf is best available control technology (BACT) for the modified recovery boiler. This is consistent with other recently permitted modified recovery boilers. We have no adverse comments on your determination.

Thank you for the opportunity to review and comment on this package. If you have any questions or comments please contact Mr. Gregg Worley of my staff, also at (404) 347-2904.

Sincerely yours,

Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: B. Mitchell ✓
C. Holladay
D. Kutyma
CHF/BA

ATTACHMENT 10



Georgia-Pacific Corporation *Palatka Operations*
Southern Pulp & Paper Division

RECEIVED

P.O. Box 919
Palatka, Florida 32078-0919
Telephone (904) 325-2001

MAY 29 1991

Division of Air
Resources Management

May 23, 1991

Certified Mail

Mr. Bruce Mitchell
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

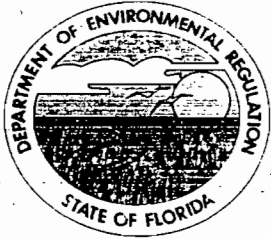
Thank you for your efforts in regards to the draft permits concerning the #4 Recovery Boiler, #4 Smelt Dissolving Tanks, and #4 Lime Kiln. Georgia-Pacific believes that the draft permits should be modified to reflect the following two comments. The application demonstrates that we netted out of PSD for SO₂ and as such the permit limit in the recovery boiler permit should be 109.9 lb/hr as requested in our application. We request that the lime kiln permit specify that the NO_x and CO limits are for a 24 hour average.

If you have any questions or if I can be of further service, please call me at 904-325-2001.

Sincerely,

Vernon L. Adams
Superintendent of
Environmental Affairs

cc: A. Beshire
D. Buff
D. Hodges
H. Hirschman
W. R. Wilson



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Georgia-Pacific Corporation
P. O. Box 919
Palatka, Florida 32078-0919

Permit Numbers: AC 54-192550
PSD-FL-171
Expiration Date: May 31, 1992
County: Putnam
Latitude/Longitude: 29°41'00"N
81°40'45"W
Project: No. 4 Recovery Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July 1, 1990 version). 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 modification of the No. 4 Recovery Boiler to allow an increase in the total process input rate of black liquor solids (BLS) and the potential pollutant emissions. The maximum total process input rate is 323,077 black liquor @ 65% solids. An electrostatic precipitator (ESP) is used to control PM/PM₁₀ emissions and visible emissions and has a minimum design efficiency of 99% for the control of particulate matter of submicron size. The project will occur at the permittee's existing facility/mill located north of S.R. 216 and west of U.S. 17. The UTM coordinates are Zone 17, 434.0 km East and 3283.4 km North.

The Standard Industrial Codes are: Industry No. 2611-Pulp Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Recovery Furnace/Direct 3-07-001-04 tons ADUP (air dried
Contact Evaporator unbleached pulp)

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

Attachments are listed below:

1. Application to Modify Air Pollution Sources, DER Form 17-1.202(1), received February 13, 1991.
2. Mr. Vernon L. Adam's letter with attachments received March 8, 1991.
3. Ms. Jewell A. Harper's letter received March 12, 1991, via FAX.
4. Mr. Andrew Kutyna's Interoffice Memorandum received March 13, 1991, via FAX.
5. Mr. C. H. Fancy's letter dated March 15, 1991.
6. Mr. Vernon L. Adam's letter with attachments received March 18, 1991.

PERMITTEE:

**Permit Number: AC 54-192550
PSD-FL-171**

Georgia-Pacific Corporation - Expiration Date: May 31, 1992

Attachments cont.:

7. Mr. Vernon L. Adam's letter received March 25, 1991.
8. Technical Evaluation and Preliminary Determination dated April 22, 1991.
9. Ms. Jewell A. Harper's letter received May 13, 1991.
10. Mr. Vernon L. Adam's letter received May 29, 1991.

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:

**Permit Number: AC 54-192550
PSD-FL-171**

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

GENERAL CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:

Permit Number: AC 54-192550

PSD-FL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

GENERAL CONDITIONS:

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

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

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

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

13. This permit constitutes Determinations of Best Available Control Technology (BACT) and Prevention of Significant Deterioration (PSD).

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

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

PERMITTEE:

**Permit Number: AC 54-192550
PSD-FL-171**

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

GENERAL CONDITIONS:

c. Records of monitoring information shall include:

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

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 corrected promptly.

SPECIFIC CONDITIONS:

1. The No. 4 Recovery Boiler (RB) may operate continuously (i.e., 8760 hrs/year).

2. The No. 4 RB's maximum process input rate/capacity is 323,077 lbs/hr black liquor @ 65% solids.

3. For the No. 4 RB and pursuant to BACT, the maximum allowable pollutant emission limiting standards/rates are:

- | | |
|----------------------|--|
| *PM/PM ₁₀ | 0.033 gr/dscf, corrected to 8% O ₂
(83.2 lbs/hr; 364.4 TPY) |
| *NO _x | 100 ppmvd, corrected 8% O ₂ , 24-hr
and annual avg. (210.6 lbs/hr; 922.4 TPY) |
| *CO | 400 ppmvd, corrected to 8% O ₂ , annual
average (512.7 lbs/hr; 2,245.6 TPY)
800 ppmvd, corrected to 8% O ₂ , 1-hr
level (1,025.4 lbs/hr; 4,491.3 TPY) |
| *VOC | 0.52 lb/ton BLS (54.6 lbs/hr; 239.1 TPY) |
| *VE | less than 20% opacity |

4. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H₂S) shall not exceed 11.4 ppmvd, corrected to 8% O₂ (17.8 lbs/hr; 78.0 TPY).

PERMITTEE:

Permit Number: AC 54-192550

PSD-FL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

SPECIFIC CONDITIONS:

5. Sulfur dioxide (SO₂) emissions shall not exceed 109.9 lbs/hr (481.4 TPY).

6. Sulfuric acid mist emissions shall not exceed 3.24 lbs/hr (14.2 TPY; based on 0.81 ppm in the stack gases (NCASI Technical Bulletin No. 106) and 427,560 acfm).

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

8. a. The initial and annual compliance tests for PM/PM₁₀ shall be conducted using EPA Method 5, Determination of Particulate Emissions from Stationary Sources, which includes EPA Methods 1-4, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

b. The initial and annual compliance tests for TRS shall be conducted using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

c. The initial and annual compliance tests for SO₂ shall be conducted using EPA Method 8, Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

d. The initial and annual compliance tests for NO_x shall be conducted using EPA Method 7E, Determination of Nitrogen Oxide Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

e. The initial and annual compliance tests for CO shall be conducted using EPA Method 10, Determination of Carbon Monoxide Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

f. The initial and annual compliance tests for VOC shall be conducted using EPA Method 25, Determination of Total Gaseous Non-Methane Organic Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A; and,

g. The initial and annual compliance tests for VE shall be conducted using EPA Method 9, Visual Determination of the Opacity Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

PERMITTEE:

Permit Number: AC 54-192550

PSD-FL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

SPECIFIC CONDITIONS:

9. For the No. 4 RB, the permittee shall comply with all of the applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1990 version).

10. Pursuant to F.A.C. Rule 17-2.600(4)(c)3.c., the No. 4 RB is subject to the applicable provisions of F.A.C. Rule 17-2.710, Continuous Monitoring Requirements, which includes F.A.C. Rule 17-2.710(4), Quarterly Reporting Requirements.

11. For the No. 4 RB, the permittee shall comply with all of the applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.

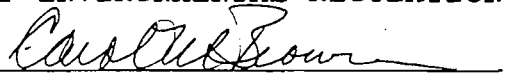
12. The Department's Northeast District office shall be notified in writing 15 days prior to source testing pursuant to F.A.C. Rule 17-2.700(2). Written reports of the tests shall be submitted to the Department's Northeast District office within 45 days of completion of the last test run pursuant to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

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

14. An application for an operation permit must be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed and noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 7 day
of June, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Carol M. Browner, Secretary



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Georgia-Pacific Corporation
P. O. Box 919
Palatka, Florida 32078-0919

Permit Numbers: AC 54-192551
PSD-FL-171
Expiration Date: May 31, 1992
County: Putnam
Latitude/Longitude: 29°41'00"N
81°40'45"W
Project: No. 4 Lime Kiln

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July 1, 1990 version). 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 modification of the No. 4 Lime Kiln to allow an increase in the total process input and product rates and the potential pollutant emissions. The maximum total process input rate is 82,986 lbs/hr CaCO₃ and inerts; and, the maximum product rate is 38,889 lbs/hr (dry) @ 90% CaO. A Zurn wet scrubber system is used to control PM/PM₁₀ emissions and visible emissions and has a minimum design efficiency of 99.0% for the control of particulate matter of submicron size. The project will occur at the permittee's existing facility/mill located north of S.R. 216 and west of U.S. 17. The UTM coordinates are Zone 17, 434.0 km East and 3283.4 km North.

The Standard Industrial Codes are: Industry No. 2611-Pulp Mills
The Standard Classification Codes are: Pulp & Paper Industry
Major Group 26: Sulfate (Kraft) Pulping
o Lime Kiln 3-07-001-06 tons ADUP (air dried unbleached pulp)

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

Attachments are listed below:

1. Application to Modify Air Pollution Sources, DER Form 17-1.202(1), received February 13, 1991.
2. Mr. Vernon L. Adam's letter with attachments received March 8, 1991.
3. Ms. Jewell A. Harper's letter received March 12, 1991, via FAX.
4. Mr. Andrew Kutyna's Interoffice Memorandum received March 13, 1991, via FAX.
5. Mr. C. H. Fancy's letter dated March 15, 1991.
6. Mr. Vernon L. Adam's letter with attachments received March 18, 1991.

PERMITTEE:

**Permit Number: AC 54-192551
PSD-FL-171**

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

Attachments cont.:

7. Mr. Vernon L. Adam's letter received March 25, 1991.
8. Technical Evaluation and Preliminary Determination dated April 22, 1991.
9. Ms. Jewell A. Harper's letter received May 13, 1991.
10. Mr. Vernon L. Adam's letter received May 29, 1991.

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:

**Permit Number: AC 54-192551
PSD-FL-171**

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

GENERAL CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:

Permit Number: AC 54-192551

PSD-FL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

GENERAL CONDITIONS:

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

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

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

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

13. This permit constitutes Determinations of Best Available Control Technology (BACT) and Prevention of Significant Deterioration (PSD).

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

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

PERMITTEE:

Permit Number: AC 54-192551
PSD-FL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

GENERAL CONDITIONS:

c. Records of monitoring information shall include:

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

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 corrected promptly.

SPECIFIC CONDITIONS:

1. The No. 4 Lime Kiln (LK) may operate continuously (i.e., 8760 hrs/year).

2. The No. 4 LK's maximum total process input rate/capacity is 82,986 lbs/hr CaCO₃ and inerts; and, the maximum product rate is 38,889 lbs/hr (dry) @ 90% CaO.

3. For the No. 4 LK and pursuant to BACT, the maximum allowable pollutant emission limiting standards/rates are:

*PM/PM₁₀ 0.081 gr/dscf, corrected to 10% O₂
(26.0 lbs/hr; 113.9 TPY)
99.0% efficiency

*NOx 290 ppmvd, corrected to 10% O₂
(50.3 lbs/hr; 223.3)
kiln design and operation

*CO 69 ppmvd, corrected to 10% O₂
(7.3 lbs/hr; 32.0)
kiln design and operation

*VOC 185 ppmvd, corrected to 10% O₂
(17.2 lbs/hr; 75.3 TPY)
kiln design and operation

*VE less than 20% opacity
(deferred due to moisture interference)

PERMITTEE:

Permit Number: AC 54-192551
PSD-FL-171
Expiration Date: May 31, 1992

Georgia-Pacific Corporation

SPECIFIC CONDITIONS:

4. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H₂S) shall not exceed 20 ppmvd, corrected to 10% O₂ (4.0 lbs/hr; 17.5 TPY).

5. Sulfur dioxide (SO₂) emissions shall not exceed 10.9 lbs/hr (47.7 TPY; based on AP-42 factor of 0.3 lb/ton ADUP, 72.9 TPH ADUP, 638,604 TPY ADUP, and 50% efficiency on the control of SO₂).

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

7. Due to moisture interference, the visible emission limiting standard of "less than 20% opacity", in accordance with BACT, is not applicable. However, if the Department observes visible emissions of 20% opacity pursuant to F.A.C. Rule 17-2.700(6)(b)9, DER Method 9, it shall be considered good reason to believe that the applicable PM/PM₁₀ mass emission standard is in danger of being violated and the permittee shall be required to conduct a special PM/PM₁₀ mass emissions compliance test in accordance with F.A.C. Rule 17-2.700(2)(b). Such a test shall be conducted within 14 days after the Department has notified the permittee in writing of the applicability of this permit condition.

8. a. The initial and annual compliance tests for PM/PM₁₀ shall be conducted using EPA Method 5, Determination of Particulate Emissions from Stationary Sources, which includes EPA Methods 1-4, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

b. The initial and annual compliance tests for TRS shall be conducted using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

c. The initial and annual compliance tests for H₂SO₄ and SO₂ shall be conducted using EPA Method 8, Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

d. The initial and annual compliance tests for NO_x shall be conducted using EPA Method 7E, Determination of Nitrogen Oxide Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

PERMITTEE:

Permit Number: AC 54-192551

PSD-FL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

SPECIFIC CONDITIONS:

- e. The initial and annual compliance tests for CO shall be conducted using EPA Method 10, Determination of Carbon Monoxide Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A; and,
 - f. The initial and annual compliance tests for VOC shall be conducted using EPA Method 25, Determination of Total Gaseous Non-Methane Organic Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.
9. For the No. 4 LK, the permittee shall comply with all of the applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1990 version).
10. Pursuant to F.A.C. Rule 17-2.600(4)(c)5.b., the No. 4 LK is subject to the applicable provisions of F.A.C. Rule 17-2.710, Continuous Monitoring Requirements, which includes F.A.C. Rule 17-2.710(4), Quarterly Reporting Requirements.
11. For the No. 4 LK, the permittee shall comply with all of the applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.
12. The Department's Northeast District office shall be notified in writing 15 days prior to source testing pursuant to F.A.C. Rule 17-2.700(2). Written reports of the tests shall be submitted to the Department's Northeast District office within 45 days of completion of the last test run pursuant to F.A.C. Rule 17-2.700(7).
13. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration date of the permit (F.A.C. Rule 17-4.090).
14. An application for an operation permit must be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed and noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

PERMITTEE:

Georgia-Pacific Corporation

Permit Number: AC 54-192551
PSD-FL-171

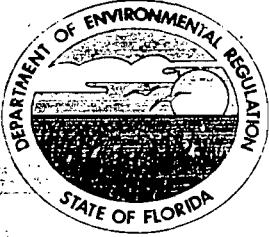
Expiration Date: May 31, 1992

SPECIFIC CONDITIONS:

Issued this 7 day
of June, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Carol M. Browner
Carol M. Browner, Secretary



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Georgia-Pacific Corporation
P. O. Box 919
Palatka, Florida 32078-0919

Permit Numbers: AC 54-193841
PSD-FL-171

Expiration Date: May 31, 1992

County: Putnam

Latitude/Longitude: 29°41'00"N
81°40'45"W

Project: No. 4 Smelt Dissolving
Tanks (North & South units)

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July 1, 1990 version). 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 Tanks (North and South units), and associated wet venturi scrubber control system, to allow an increase in the total process input rate of smelt. The maximum total process input rate is 85,890 lbs/hr smelt. The wet venturi scrubber system is used to control the emissions of PM/PM₁₀ and TRS (total reduced sulfur) and visible emissions and has a minimum design efficiency of 95% for the control of particulate matter of submicron size. The project will occur at the permittee's existing facility/mill located north of S.R. 216 and west of U.S. 17. The UTM coordinates are Zone 17, 434.0 km East and 3283.4 km North.

The Standard Industrial Codes are: Industry No. 2611-Pulp Mills

The Standard Classification Codes are: Pulp & Paper Industry

Major Group 26: Sulfate (Kraft) Pulping

o Smelt Dissolving Tank 3-07-001-05 tons ADUP (air dried
unbleached pulp)

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

Attachments are listed below:

1. Application to Modify Air Pollution Sources, DER Form 17-1.202(1), received February 13, 1991.
2. Mr. Vernon L. Adam's letter with attachments received March 8, 1991.
3. Ms. Jewell A. Harper's letter received March 12, 1991, via FAX.
4. Mr. Andrew Kutyna's Interoffice Memorandum received March 13, 1991, via FAX.

PERMITTEE:**Permit Number: AC 54-193841****PSD-FL-171****Georgia-Pacific Corporation****Expiration Date: May 31, 1992****Attachments cont.:**

5. Mr. C. H. Fancy's letter dated March 15, 1991.
6. Mr. Vernon L. Adam's letter with attachments received March 18, 1991.
7. Mr. Vernon L. Adam's letter received March 25, 1991.
8. Technical Evaluation and Preliminary Determination dated April 22, 1991.
9. Ms. Jewell A. Harper's letter received May 13, 1991.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:

**Permit Number: AC 54-193341
PSD-FL-171**

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

GENERAL CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:

Permit Number: AC 54-193841

PSD-FL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

GENERAL CONDITIONS:

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

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

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

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

13. This permit constitutes Determinations of Best Available Control Technology (BACT) and Prevention of Significant Deterioration (PSD).

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

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

PERMITTEE:

Permit Number: AC 54-193841

PSD-FL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

GENERAL CONDITIONS:

c. Records of monitoring information shall include:

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

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 corrected promptly.

SPECIFIC CONDITIONS:

1. The No. 4 Smelt Dissolving Tanks (SDTs; North and South units) may operate continuously (i.e., 8760 hrs/year).
2. The No. 4 SDTs total maximum processing rate/capacity is 85,890 lbs/hr smelt (green liquor solids) and based on the No. 4 Recovery Boiler burning 323,077 lbs/hr black liquor @ 65% solids, which is equivalent to 210,000 lbs/hr black liquor solids (BLS @ 100%).
3. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H₂S) shall not exceed 0.048 lb/3000 pounds BLS (3.4 lbs/hr, 14.9 TPY; based on a maximum total process input rate/capacity of 210,000 lbs/hr BLS in the No. 4 Recovery Boiler (RB) - equivalent to 85,890 lbs/hr smelt (green liquor solids)).
4. PM/PM₁₀ mass emissions shall not exceed 0.12 lb/ton BLS to the No. 4 RB (12.6 lbs/hr; 55.2 TPY), which is based on BACT.
5. Due to moisture interference, the visible emission limiting standard of "less than 20% opacity", in accordance with BACT, is not applicable. However, if the Department observes visible emissions of 20% opacity pursuant to F.A.C. Rule 17-2.700(6)(b)9, DER Method 9, it shall be considered good reason to believe that the applicable PM/PM₁₀ mass emission standard is in danger of being violated and the permittee shall be required to conduct a special PM/PM₁₀ mass emissions compliance test in accordance with F.A.C. Rule 17-2.700(2)(b). Such a test shall be conducted within 14 days after the Department has notified the permittee in writing of the applicability of this permit condition.

PERMITTEE:

Permit Number: AC 54-193841

PSD-FL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

SPECIFIC CONDITIONS:

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

7. a. Initial and annual compliance tests for PM/PM₁₀ shall be conducted using EPA Method 5, Determination of Particulate Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

b. Initial and annual compliance tests for TRS shall be conducted using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

8. For the No. 4 SDTs, the permittee shall comply with all of the applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1990 version).

9. Pursuant to F.A.C. Rule 17-2.600(4)(c)4.b., the No. 4 SDTs are subject to the applicable provisions of F.A.C. Rule 17-2.710, Continuous Monitoring Requirements, which includes F.A.C. Rule 17-2.710(4), Quarterly Reporting Requirements.

10. For the No. 4 SDTs, the permittee shall comply with all of the applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.

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

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

13. An application for an operation permit must be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed and noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

PERMITTEE:

Georgia-Pacific Corporation

Permit Number: AC 54-193841

PSD-FL-171

Expiration Date: May 31, 1992

SPECIFIC CONDITIONS:

Issued this 7 day
of June, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Carol M. Browner
Carol M. Browner, Secretary

Best Available Control Technology (BACT) Determination
Georgia-Pacific Corporation
Putnam County

The applicant proposes to implement modifications/enhancements to the No. 4 Recovery Boiler (RB) and Lime Kiln (LK), which has the potential to increase their total process input and product rates and potential pollutant emissions. The No. 4 Smelt Dissolving Tanks (SDTs; North and South units) will also have an increase in the total process input rate of smelt and the potential pollutant emissions due to the increase of black liquor solids (BLS) burned in the No. 4 RB. The mill is located in an area designated attainment for all of the criteria pollutants.

The applicant has indicated the maximum net total annual tonnage of regulated air pollutants emitted from the project based on 8,760 hours per year operation to be as follows:

Pollutant	Max. Net Increase in Emissions (TPY)	PSD Significant Emission Rate (TPY)
TSP (PM)	464.7	25
PM ₁₀	495.4	15
SO ₂	8.8	40
NOX	516.4	40
CO	167.5	100
VOC	70.1	40
TRS	9.90	10
Pb	0.02	0.6
Be	0.0002	0.004
H ₂ SO ₄	1.4	7

Rule 17-2.500(2)(f)(3) of the Florida Administrative Code (F.A.C.) requires a BACT review of all regulated pollutants emitted in an amount equal to or greater than the significant rates listed in Table 500-2, F.A.C. Chapter 17-2.

BACT Determination Requested by the Applicant:

No. 4 RB

PM/PM ₁₀	0.044 gr/dscf, corrected to 8% oxygen
NOx	100 ppmvd, corrected to 8% oxygen
CO	400 ppmvd, corrected to 8% oxygen (annual avg.)
	800 ppmvd, corrected to 8% oxygen (1 hr. avg.)
VOC	0.52 lb/ton BLS

No. 4 SDT

PM	31.6 lbs/hr (138.4 TPY; Process Weight; 0.30 lb/ton BLS input to the RB)
PM ₁₀	28.3 lbs/hr (124.0 TPY; 89.5% of PM)

No. 4 LK

PM	31.42 lbs/hr (137.6 TPY; @4% O ₂ , 0.098 gr/dscf, corrected to 10% O ₂ ; fossil fuel)
PM ₁₀	30.9 lbs/hr (135.3 TPY; 98.3% of PM)
NOx	0.37 lb/MMBtu (50.3 lbs/hr)
CO	@4% O ₂ , 45 ppmvd, corrected to 10% O ₂ (7.3 lbs/hr)
VOC	@4% O ₂ , 190 ppmvd, corrected to 10% O ₂ (17.7 lbs/hr)

Date of Receipt of a BACT Application:

February 13, 1991

Review Group Members:

This determination was based on comments received from the applicant and the Permitting and Standards Section.

BACT Determination Procedure

In accordance with Florida Administrative Code Chapter 17-2, Air Pollution, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.
- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

BACT Analysis:

A. No. 4 RB:

1. PM/PM₁₀

A review of recent BACT determinations for PM/PM₁₀ from kraft recovery boilers indicates that the emission rate proposed by the applicant does not represent BACT. The rationale for establishing BACT at a lower than proposed level is presented as follows:

The applicant indicated that an emission rate of 0.044 gr/dscf, corrected to 8% oxygen, is representative of BACT taking into consideration previously issued BACTs having emission rates of 0.021 - 0.044 gr/dscf, corrected to 8% O₂ (avg. of 0.033 gr/dscf). The summary of these determinations have been based on ESP control, which is the control technology employed by the No. 4 RB.

The No. 4 RB has achieved emission rates of 0.009 - 0.037 gr/dscf, corrected to 8% O₂, in previous PM compliance tests (average of 0.022 gr/dscf, corrected to 8% O₂).

During the next proposed mill outage, the applicant has proposed an upgrade of the ESP, but was not specific on the details. However, certain modifications can be made (i.e., addition of additional transformer-rectifier sets, change defective wires and warped plates, etc.) to improve collection efficiency. The applicant did not indicate that the ESPs wires, plates, transformer-rectifier sets, etc., would be inspected and, where necessary, be replaced.

A review of the proposed PM/PM₁₀ increases in potential emissions have shown that there will not be an adverse affect to the environment.

Based on previous BACT determinations, actual test results, and ESP maintenance/upgrade, the Department feels that an emission rate of 0.033 gr/dscf, corrected to 8% O₂, is more realistic as a BACT requirement.

2. NOx

A review of recent BACT determinations for nitrogen oxides from kraft recovery boilers indicate that emission rates that are below 100 ppmvd, corrected to 8% O₂, have been justified for new recovery boilers. For some modified recovery boilers, the emission rates have been justified as high as 200 ppmvd, corrected to 8% O₂.

Combustion control is the control technique employed to minimize NOx emissions from the No. 4 RB. It is not yet known what affect that the changes in the combustion air (addition of the tertiary air) will cause in NOx emissions.

In addition to combustion controls, NOx emissions potentially can be controlled by post-combustion reduction systems (i.e., selective catalytic reduction (SCR) and selective non-catalytic reduction (SNCR)). SCR and SNCR have not been applied to recovery boilers and are considered technically unproven and infeasible at this time.

A review of the proposed NOx increases in potential emissions have shown that there will not be an adverse affect to the environment.

Therefore, the Department does not feel that a more stringent emission rate is justified and believes the emission rate that was requested by the applicant is representative of BACT.

3. CO and VOC

Previous BACT determinations for CO and VOC have been justified with emissions rates of 169 - 1,000 ppmvd, corrected to 8% O₂, and 0.044 - 0.61 lb/ton BLS, respectively. All previous BACT determinations for control of CO and VOC have been based on good combustion practices.

A review of the proposed CO and VOC increases in potential emissions have shown that there will not be an adverse affect to the environment.

The Department does not feel that more stringent emission rates are justified and believes the emission rates that were requested by the applicant are representative of BACT.

4. Visible Emissions

Since PM/PM₁₀ emissions are subject to BACT, then a standard for visible emissions (VE) is warranted. Pursuant to F.A.C. Rule 17-2.610(2), General Visible Emissions Standard, the VE standard is less than 20% opacity. Previous BACT determinations have justified a VE limit of 20% opacity. Therefore, a more stringent emission limit is not justified.

B. No. 4 SDTs (North & South units):

1. PM/PM₁₀

A review of recent BACT determinations for PM/PM₁₀ from smelt dissolving tanks indicate that the emission rate proposed by the applicant does not represent BACT. The rationale for establishing BACT at a lower than proposed level is presented as follows:

Previous BACT determinations for PM emissions have been justified with emissions rates of 0.12 - 0.20 lb/ton BLS input to the RB; and, the sources were controlled with wet scrubbers, as are the No. 4 SDTs. It has been demonstrated that the No. 4 SDTs wet scrubber control system can control emissions to less than 10 lbs/hr total (0.095 lb/ton BLS input). The venturi scrubber control system has a design minimum efficiency of 95% for submicron size particles.

The process weight table, which was requested by the applicant, is not at all justified because it is not technology nor control based.

A review of the proposed PM/PM₁₀ increases in potential emissions have shown that there will not be an adverse affect to the environment.

Therefore, based on previous BACT determinations and actual test results, the Department feels that an emission rate of 0.12 lb/ton BLS is more representative of BACT.

2. Visible Emissions

Since PM/PM₁₀ emissions are subject to BACT, then a standard for visible emissions (VE) is warranted. Pursuant to F.A.C. Rule 17-2.610(2), General Visible Emissions Standard, the VE standard is less than 20% opacity. Previous BACT determinations have justified a VE limit of 20% opacity. Therefore, a more stringent limit is not justified. However, the imposition of a VE standard will not be applied due to moisture interference from the associated wet venturi scrubber control system; but, it will be used as an indicator of a potential non-compliance with the mass emission limiting standard and will initiate a special PM/PM₁₀ mass compliance test requirement pursuant to F.A.C. Rule 17-2.700(2)(b) when the Department observes an opacity of 20% using DER Method 9.

C. No. 4 LK:

1. PM/PM₁₀

A review of recent BACT determinations for PM/PM₁₀ from lime kilns at kraft pulp mills indicate that the emission rate proposed by the applicant does not represent BACT. The rationale for establishing BACT at a lower than proposed level is presented as follows:

Previous BACT determinations have justified emissions rates of 0.054 - 0.130 gr/dscf, corrected to 10% O₂. Two of the previous BACT determinations set the emissions rate at 0.067 gr/dscf, corrected to 10% O₂, while firing liquid fossil fuel; also, each source was equipped with a wet venturi scrubber control system. The No. 4 LK will be firing No. 6 fuel oil and is also equipped with a wet venturi scrubber control system.

The NSPS emission rate for lime kilns (new/modified sources) firing liquid fossil fuel is 0.13 gr/dscf, corrected to 10% O₂. Section 111 of the Clean Air Act requires that each NSPS be revisited every 5 years for review and evaluation. Since the lowest BACT determination is 0.054 gr/dscf, corrected to 10% O₂, it seems likely that the allowable emission rate will be reduced. The NSPS, 40 CFR 60, Subpart BB is to be revisited this year.

The previous stack test results for the No. 4 LK exhibit emissions rates of 0.06 - 0.079 gr/dscf, corrected to 10% O₂. The Zurn scrubber's design control efficiency is 99.0% for PM at submicron size.

A review of the proposed PM/PM₁₀ increases in potential emissions have shown that there will not be an adverse affect to the environment.

Therefore, based on previous BACT determinations and actual test results, the Department believes that an emission rate of 0.081 gr/dscf, corrected to 10% O₂, is more representative of BACT.

2. NOx

Previous BACT determinations have justified emissions rates of 100 - 336 ppmv, corrected to 10% O₂. In terms of lime produced, the range was 1.55 - 4.32 lbs/ton CaO produced. The proposed No. 4 LK BACT determination by the applicant is within the range of the previously issued BACT determinations.

A review of the proposed NOx increases in potential emissions have shown that there will not be an adverse affect to the environment.

The Department does not feel that a more stringent emission rate is justified and believes the emission rate that was requested by the applicant is representative of BACT.

3. CO

Previous BACT determinations have a CO emission rate range of 52 - 240 ppmvd, corrected to 10% O₂, and, in terms of lime produced, 0.48 - 26.16 lbs/ton CaO produced. For the No. 4 LK, the applicant used an AP-42 emission factor to propose a BACT of 45 ppmvd @ 4% O₂, corrected to 10% O₂ (0.38 lbs/ton CaO produced), which is at the lower end of previous BACT determinations.

A review of the proposed CO increases in potential emissions have shown that there will not be an adverse affect to the environment. The Department does not feel that a more stringent emission rate is justified and believes the emission rate that was requested by the applicant is representative of BACT.

4. VOC

Previous BACT determinations have a VOC emissions rate range of 31 - 185 ppmvd, corrected to 10% O₂, and, in terms of lime produced, 0.24 - 1.2 lbs/ton CaO produced. The applicant used a NACSI emission factor to propose a BACT of 190 ppmvd @4% O₂, corrected to 10% O₂ (0.91 lbs/ton CaO produced), which is slightly higher than previous BACT determinations.

A review of the proposed VOC increases in potential emissions have shown that there will not be an adverse affect to the environment.

The Department feels that the source can achieve the emission rate that has been justified in previous BACT determinations (185 ppmvd), which is slightly less than what was requested (190 ppmvd) by the applicant.

5. VE

Since PM/PM₁₀ emissions are subject to BACT, then a standard for visible emissions (VE) is warranted. Pursuant to F.A.C. Rule 17-2.610(2), General Visible Emissions Standard, the VE standard is less than 20% opacity. Previous BACT determinations have justified a VE limit of 20% opacity. Therefore, a more stringent limit is not justified. However, the imposition of a VE standard will not be applied due to moisture interference from the associated Zurn wet scrubber control system; but, it will be used as an indicator of a potential non-compliance with the mass emission limiting standard (BACT) and will initiate a special PM/PM₁₀ mass compliance test requirement pursuant to F.A.C. Rule 17-2.700(2)(b) when the Department observes an opacity of 20% using DER Method 9.

BACT Determination Summary and Results:

A. No. 4 Recovery Boiler:

For the No. 4 RB, the Department has evaluated the pollutants PM/PM₁₀, NOx, CO, VOC and visible emissions for BACT. Actual test results, ESP maintenance/upgrade, and previous BACT determinations suggest that a lower PM/PM₁₀ emission rate can be achieved. Even though a visible emissions limit was not requested by the applicant, the Department will propose a level that will be equivalent to previous BACT determinations and F.A.C. Chapter 17-2. The Department will establish emission rates for NOx, CO and VOC at the

emission rates that were requested by the applicant. Therefore, the Department has determined that BACT should be as follows:

- *PM/PM₁₀ 0.033 gr/dscf, corrected to 8% O₂
(83.2 lbs/hr; 364.4 TPY)
- *NOx 100 ppmvd, corrected 8% O₂, 24-hr
and annual avg. (210.6 lbs/hr; 922.4 TPY)
- *CO 400 ppmvd, corrected to 8% O₂, annual
average (512.7 lbs/hr; 2,245.6 TPY)
800 ppmvd, corrected to 8% O₂, 1-hr
level (1,025.4 lbs/hr; 4,491.3 TPY)
- *VOC 0.52 lb/ton BLS (54.6 lbs/hr; 239.1 TPY)
- *VE less than 20% opacity

B. No. 4 Smelt Dissolving Tanks (North & South units):

For the No. 4 SDTs (North & South units), the Department has evaluated PM/PM₁₀ and visible emissions for BACT. Actual test results and previous BACT determinations suggest that a lower PM/PM₁₀ emissions rate can be achieved. Even though a visible emissions limit was not requested by the applicant, the Department will propose a level that will be equivalent to previous BACT determinations and F.A.C. Chapter 17-2. Therefore, the Department has determined that BACT should be as follows:

- *PM/PM₁₀ 0.12 lb/ton BLS input to the No. 4 RB
(12.6 lbs/hr; 55.2 TPY)
- *VE less than 20% opacity
(deferred due to moisture interference)

C. No. 4 Lime Kiln:

For the No. 4 LK, the Department has evaluated the pollutants PM/PM₁₀, NOx, CO, VOC and visible emissions for BACT. Actual test results and previous BACT determinations suggest that a lower PM/PM₁₀ emission rate can be achieved. Even though a visible emissions limit was not requested by the applicant, the Department will propose a level that will be equivalent to previous BACT determinations and F.A.C. Chapter 17-2. The Department will establish emission rates for NOx and CO at the emission rates that were requested by the applicant. The VOC emission rate will be equivalent to previous BACT determinations and slightly less than what had been requested by the applicant. Therefore, the Department has determined that BACT should be as follows:

*PM/PM₁₀ 0.081 gr/dscf, corrected to 10% O₂
 (26.0 lbs/hr; 113.9 TPY)
 99.0% efficiency

*NOx 290 ppmvd, corrected to 10% O₂
 (50.3 lbs/hr; 223.3)
 kiln design and operation

*CO 69 ppmvd, corrected to 10% O₂
 (7.3 lbs/hr; 32.0)
 kiln design and operation

*VOC 185 ppmvd, corrected to 10% O₂
 (17.2 lbs/hr; 75.3 TPY)
 kiln design and operation

*VE less than 20% opacity
 (deferred due to moisture interference)

Details of the Analysis May be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator
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 Bureau of Air Regulation
 2600 Blair Stone Road
 Tallahassee, Florida 32399-2400

Recommended by:

Approved by:

C. H. Fancy

Carol M. Browner

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

Carol M. Browner, Secretary
 Dept. of Environmental Regulation

June 5, 1991
 Date

June 7, 1991
 Date