

*REVISED*

**MACT II AIR PERMIT APPLICATION  
GEORGIA-PACIFIC CORPORATION  
PALATKA MILL**

**Prepared for:**

**Georgia-Pacific Corporation  
North of CR 216; West of US 17  
Palatka, Florida 32177**

**Prepared by:**

**Golder Associates Inc.  
6241 NW 23rd Street, Suite 500  
Gainesville, Florida 32653-1500**

**September 2003  
0337515**

**DISTRIBUTION:**

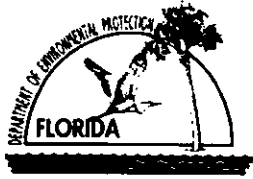
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**PART A**

**APPLICATION FOR AIR PERMIT  
TITLE V SOURCE**



# Department of Environmental Protection

## Division of Air Resources Management

### APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

#### I. APPLICATION INFORMATION

RECEIVED  
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BUREAU OF AIR REGULATION

#### Identification of Facility

1. Facility Owner/Company Name: <b>Georgia-Pacific Corporation</b>	
2. Site Name: <b>Palatka Mill</b>	
3. Facility Identification Number: <b>1070005</b> [ ] Unknown	
4. Facility Location: Street Address or Other Locator: <b>North of CR 216; West of US 17</b> City: <b>Palatka</b> County: <b>Putnam</b> Zip Code: <b>32177</b>	
5. Relocatable Facility? [ ] Yes [ <b>X</b> ] No	6. Existing Permitted Facility? [ <b>X</b> ] Yes [ ] No

#### Application Contact

1. Name and Title of Application Contact: <b>Myra Carpenter, Superintendent of Environmental Affairs</b>	
2. Application Contact Mailing Address: Organization/Firm: <b>Georgia-Pacific Corporation</b> Street Address: <b>P.O. Box 919</b> City: <b>Palatka</b> State: <b>FL</b> Zip Code: <b>32178-0919</b>	
3. Application Contact Telephone Numbers: Telephone: <b>( 386 ) 325 - 2001</b> Fax: <b>( 386 ) 328 - 0014</b>	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**Purpose of Application**

**Air Operation Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

Initial Title V air operation permit for an existing facility which is classified as a Title V source.

Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: \_\_\_\_\_

Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: \_\_\_\_\_

Operation permit number to be revised: \_\_\_\_\_

Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: \_\_\_\_\_

Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: \_\_\_\_\_

Reason for revision: \_\_\_\_\_

**Air Construction Permit Application**


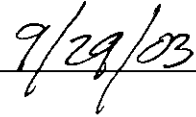
This Application for Air Permit is submitted to obtain: (Check one)

Air construction permit to construct or modify one or more emissions units.

Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Air construction permit for one or more existing, but unpermitted, emissions units.

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: <b>Theodore D. Kennedy, Vice President, Georgia-Pacific, Palatka Operations</b>
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: <b>Georgia-Pacific Corporation</b> Street Address: <b>P.O. Box 919</b> City: <b>Palatka</b> State: <b>FL</b> Zip Code: <b>32178-0919</b>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <b>( 386 ) 325 - 2001</b> Fax: <b>( 386 ) 328 - 0014</b>
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [ ], if so) or the responsible official (check here [ X ], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>   Signature   Date

\* Attach letter of authorization if not currently on file.

**Professional Engineer Certification**

1. Professional Engineer Name: <b>David A. Buff</b> Registration Number: <b>19011</b>
2. Professional Engineer Mailing Address: Organization/Firm: <b>Golder Associates Inc.*</b> Street Address: <b>6241 NW 23rd Street, Suite 500</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32653-1500</b>
3. Professional Engineer Telephone Numbers: Telephone: <b>( 352 ) 336 - 5600</b> Fax: <b>( 352 ) 336 - 6603</b>

\* Board of Professional Engineers Certificate of Authorization #00001670

4. Professional Engineer Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [ ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ X ], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*

*David A. Buff*

Signature

*9/25/03*

Date

(seal)

\* Attach any exception to certification statement.

**Scope of Application**

<b>Emissions Unit ID</b>	<b>Description of Emissions Unit</b>	<b>Permit Type</b>	<b>Processing Fee</b>
018	No. 4 Recovery Boiler	AC1B	
019	No. 4 Smelt Dissolving Tanks (2)	AC1B	
017	No. 4 Lime Kiln	AC1B	

**Application Processing Fee**

Check one: [ ] Attached - Amount: \$: \_\_\_\_\_ [ X ] Not Applicable

**Construction/Modification Information**

1. Description of Proposed Project or Alterations:

**See Part B**

2. Projected or Actual Date of Commencement of Construction: **NA – No Actual Construction**

3. Projected Date of Completion of Construction: **NA – No Actual Construction**

**Application Comment**



## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates: Zone: <b>17</b> East (km): <b>434.0</b> North (km): <b>3283.4</b>			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): <b>29 / 41 / 0</b> Longitude (DD/MM/SS): <b>81 / 40 / 45</b>			
3. Governmental Facility Code: <b>0</b>	4. Facility Status Code: <b>A</b>	5. Facility Major Group SIC Code: <b>26</b>	6. Facility SIC(s): <b>2611, 2621</b>
7. Facility Comment (limit to 500 characters):			

#### Facility Contact

1. Name and Title of Facility Contact: <b>Myra Carpenter, Superintendent of Environmental Affairs</b>
2. Facility Contact Mailing Address: Organization/Firm: <b>Georgia-Pacific Corporation</b> Street Address: <b>P.O. Box 919</b> City: <b>Palatka</b> State: <b>FL</b> Zip Code: <b>32178-0919</b>
3. Facility Contact Telephone Numbers: Telephone: <b>(386) 325-2001</b> Fax: <b>(386) 328-0014</b>

**Facility Regulatory Classifications**

**Check all that apply:**

1. [ ] Small Business Stationary Source?	[ ] Unknown
2. [ X ] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. [ ] Synthetic Minor Source of Pollutants Other than HAPs?	
4. [ X ] Major Source of Hazardous Air Pollutants (HAPs)?	
5. [ ] Synthetic Minor Source of HAPs?	
6. [ X ] One or More Emissions Units Subject to NSPS?	
7. [ X ] One or More Emission Units Subject to NESHAP?	
8. [ ] Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters):	

**List of Applicable Regulations**

<b>62-210.700(1) - Excess Emission</b>
<b>62-210.700(4) - Excess Emission</b>
<b>62-210.700(5) - Excess Emission</b>
<b>62-210.700(6) - Excess Emission</b>
<b>62-296.320(4) - General VE Limit</b>
<b>See Title V Core List, Effective 3/1/02</b>

## Title V Core List

Effective: 03/01/02

[**Note:** The Title V Core List is meant to simplify the completion of the "List of Applicable Regulations" for DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.]

**Federal:** (description)

40 CFR 61, Subpart M: NESHAP for Asbestos.

40 CFR 82: Protection of Stratospheric Ozone.

40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).

40 CFR 82, Subpart F: Recycling and Emissions Reduction.

**State:** (description)

**CHAPTER 62-4, F.A.C.: PERMITS, effective 06-01-01**

62-4.030, F.A.C.: General Prohibition.

62-4.040, F.A.C.: Exemptions.

62-4.050, F.A.C.: Procedure to Obtain Permits; Application.

62-4.060, F.A.C.: Consultation.

62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.

62-4.080, F.A.C.: Modification of Permit Conditions.

62-4.090, F.A.C.: Renewals.

62-4.100, F.A.C.: Suspension and Revocation.

62-4.110, F.A.C.: Financial Responsibility.

62-4.120, F.A.C.: Transfer of Permits.

62-4.130, F.A.C.: Plant Operation - Problems.

62-4.150, F.A.C.: Review.

62-4.160, F.A.C.: Permit Conditions.

62-4.210, F.A.C.: Construction Permits.

62-4.220, F.A.C.: Operation Permit for New Sources.

**CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 06-21-01**

62-210.300, F.A.C.: Permits Required.

62-210.300(1), F.A.C.: Air Construction Permits.

62-210.300(2), F.A.C.: Air Operation Permits.

62-210.300(3), F.A.C.: Exemptions.

62-210.300(5), F.A.C.: Notification of Startup.

62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.300(7), F.A.C.: Transfer of Air Permits.

## Title V Core List

Effective: 03/01/02

- 62-210.350, F.A.C.: Public Notice and Comment.
- 62-210.350(1), F.A.C.: Public Notice of Proposed Agency Action.
- 62-210.350(2), F.A.C.: Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review.
- 62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources.

- 62-210.360, F.A.C.: Administrative Permit Corrections.
- 62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
- 62-210.400, F.A.C.: Emission Estimates.
- 62-210.650, F.A.C.: Circumvention.
- 62-210.700, F.A.C.: Excess Emissions.

- 62-210.900, F.A.C.: Forms and Instructions.
- 62-210.900(1), F.A.C.: Application for Air Permit – Title V Source, Form and Instructions.
- 62-210.900(5), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.
- 62-210.900(7), F.A.C.: Application for Transfer of Air Permit – Title V and Non-Title V Source.

### **CHAPTER 62-212, F.A.C.: STATIONARY SOURCES - PRECONSTRUCTION REVIEW, effective 08-17-00**

### **CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 04-16-01**

- 62-213.205, F.A.C.: Annual Emissions Fee.
- 62-213.400, F.A.C.: Permits and Permit Revisions Required.
- 62-213.410, F.A.C.: Changes Without Permit Revision.
- 62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.
- 62-213.415, F.A.C.: Trading of Emissions Within a Source.
- 62-213.420, F.A.C.: Permit Applications.
- 62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.
- 62-213.440, F.A.C.: Permit Content.
- 62-213.450, F.A.C.: Permit Review by EPA and Affected States
- 62-213.460, F.A.C.: Permit Shield.
  
- 62-213.900, F.A.C.: Forms and Instructions.
- 62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form.
- 62-213.900(7), F.A.C.: Statement of Compliance Form.

## **Title V Core List**

Effective: 03/01/02

### **CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-02-99**

62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter.

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

### **CHAPTER 62-297, F.A.C.: STATIONARY SOURCES - EMISSIONS MONITORING, effective 03-02-99**

62-297.310, F.A.C.: General Test Requirements.

62-297.330, F.A.C.: Applicable Test Procedures.

62-297.340, F.A.C.: Frequency of Compliance Tests.

62-297.345, F.A.C.: Stack Sampling Facilities Provided by the Owner of an Emissions  
Unit.

62-297.350, F.A.C.: Determination of Process Variables.

62-297.570, F.A.C.: Test Report.

62-297.620, F.A.C.: Exceptions and Approval of Alternate Procedures and Requirements.

#### **Miscellaneous:**

**CHAPTER 28-106, F.A.C.: Decisions Determining Substantial Interests**

**CHAPTER 62-110, F.A.C.: Exception to the Uniform Rules of Procedure, effective  
07-01-98**

**CHAPTER 62-256, F.A.C.: Open Burning and Frost Protection Fires, effective 11-30-94**

**CHAPTER 62-257, F.A.C.: Asbestos Notification and Fee, effective 02-09-99**

**CHAPTER 62-281, F.A.C.: Motor Vehicle Air Conditioning Refrigerant Recovery and  
Recycling, effective 09-10-96**

## B. FACILITY POLLUTANTS

### List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
PM	A				Particulate Matter – Total
PM <sub>10</sub>	A				Particulate Matter – PM <sub>10</sub>
SO <sub>2</sub>	A				Sulfur Dioxide
NO <sub>x</sub>	A				Nitrogen Oxides
CO	A				Carbon Monoxide
VOC	A				Volatile Organic Compounds
SAM	A				Sulfuric Acid Mist
TRS	A				Total Reduced Sulfur
HAPs	A				Total Hazardous Air Pollutants
H001	A				Acetaldehyde
H021	B				Beryllium Compounds
H043	A				Chloroform
H095	A				Formaldehyde
H106	A				Hydrochloric Acid
H115	A				Methanol

**C. FACILITY SUPPLEMENTAL INFORMATION**

**Supplemental Requirements**

1. Area Map Showing Facility Location: [ ] Attached, Document ID: _____ [ ] Not Applicable [ X ] Waiver Requested
2. Facility Plot Plan: [ ] Attached, Document ID: _____ [ ] Not Applicable [ X ] Waiver Requested
3. Process Flow Diagram(s): [ ] Attached, Document ID: _____ [ ] Not Applicable [ X ] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID: _____ [ X ] Not Applicable [ ] Waiver Requested
5. Fugitive Emissions Identification: [ ] Attached, Document ID: _____ [ X ] Not Applicable [ ] Waiver Requested
6. Supplemental Information for Construction Permit Application: [ X ] Attached, Document ID: <b>Part B</b> _____ [ ] Not Applicable
7. Supplemental Requirements Comment:

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID:) _____ or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable



**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION  
(All Emissions Units)**

**Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <b>No. 4 Recovery Boiler</b>			
4. Emissions Unit Identification Number:			
ID: <b>018</b>		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code: <b>A</b>	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: <b>26</b>	8. Acid Rain Unit? [ ]
9. Emissions Unit Comment: (Limit to 500 Characters)			

**Emissions Unit Control Equipment**

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

**Electrostatic Precipitator**

2. Control Device or Method Code(s):  **10**

**Emissions Unit Details**

1. Package Unit:	
Manufacturer:	Model Number:
2. Generator Nameplate Rating:	MW
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	1,278	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	210,000	lb/hr BLS
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p><b>Maximum heat input rate and throughput rates are 24-hr averages. Maximum heat input rate based on 6,084 Btu/lb BLS. Maximum Process Rate: 5,040,000 lb/day BLS.</b></p>		

**C. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)****List of Applicable Regulations**

- 62-296.404(1)(a)1. Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(2)(a) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(3)(c)1.a. Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(3)(c)3. Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(4)(a) Kraft Recovery Furnaces
- 62-296.404(4)(f) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(5)(a) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(5)(b) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(a) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(b) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(c)1. Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(c)4. Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(d) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-297.310 General Test Requirements
- 62-297.401(1)(a) EPA Method 1 - Sample and Velocity Traverses for Stationary Sources
- 62-297.401(2) EPA Method 2 - Determination of Stack Gas Velocity and Volumetric Flow Rate
- 62-297.401(3) EPA Method 3 - Gas Analysis for Carbon Dioxide, Oxygen, Excess Air, and Dry Molecular Weight
- 62-297.401(4) EPA Method 4 - Determination of Moisture Content in Stack Gases
- 62-297.401(5) EPA Method 5 - Determination of Particulate Emissions from Stationary Sources
- 62-297.401(7) EPA Method 7 - Determination of Nitrogen Oxide Emissions from Stationary Sources
- 62-297.401(7)(e) EPA Method 7E - Determination of Nitrogen Oxide Emissions from Stationary Sources
- 62-297.401(8) EPA Method 8 - Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources
- 62-297.401(9)(a) EPA Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources
- 62-297.401(10) EPA Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources
- 62-297.401(16) EPA Method 16 - Semicontinuous Determination of Sulfur Emissions from Stationary Sources
- 62-297.401(16)(a) EPA Method 16A - Determination of Total Reduced Sulfur Emissions from Stationary Sources
- 62-297.401(25) EPA Method 25 - Determination of Total Gaseous Nonmethane Organic Emissions as Carbon
- 62-297.401(25)(a) EPA Method 25A - Determination of Total Gaseous Organic Concentration Using a Flame Ionization Detector
- 62-297.401(34) EPA Method 103 - Beryllium Screening Method
- 62-297.401(35) EPA Method 104 - Determination of Beryllium Emissions from Stationary Sources
- 40 CFR 63 - Subpart MM - NESHAPs for Chemical Recovery Combustion Sources, Kraft, Soda, Sulfite, and Stand Alone Semi-Chemical Pulp Mills

**D. EMISSION POINT (STACK/VENT) INFORMATION**  
**(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? <b>018</b>		2. Emission Point Type Code: <b>1</b>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: <b>V</b>	6. Stack Height: <b>230</b> feet	7. Exit Diameter: <b>12</b> feet	
8. Exit Temperature: <b>425</b> °F	9. Actual Volumetric Flow Rate: <b>447,000</b> acfm	10. Water Vapor: <b>21</b> %	
11. Maximum Dry Standard Flow Rate: <b>294,000</b> dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):  <b>Maximum Dry Standard Flow Rate is at 8 percent O<sub>2</sub>.</b>			

**E. SEGMENT (PROCESS/FUEL) INFORMATION**  
(All Emissions Units)

**Segment Description and Rate:** Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>Pulp and Paper and Wood Products, Sulfate (Kraft) Pulping, Recovery Furnace/Indirect Contact Evaporator.</b>		
2. Source Classification Code (SCC): <b>3-07-001-10</b>		3. SCC Units: <b>Tons Air-dried Unbleached Pulp Produced</b>
4. Maximum Hourly Rate: <b>118</b>	5. Maximum Annual Rate: <b>675,250</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):  <b>Maximum annual rate is based on maximum daily rate of 1,850 tons/day ADUP (monthly average).</b>		

**Segment Description and Rate:** Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>External Combustion Boilers; Industrial: Residual Oil</b>		
2. Source Classification Code (SCC): <b>1-02-004-01</b>		3. SCC Units: <b>Thousand Gallons Burned</b>
4. Maximum Hourly Rate: <b>8.52</b>	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: <b>2.35</b>	8. Maximum % Ash:	9. Million Btu per SCC Unit: <b>150</b>
10. Segment Comment (limit to 200 characters):  <b>Residual oil may include No. 6 fuel oil and on spec used oil. Fuel used for startup, shutdown, and malfunction only; therefore, an annual rate is inappropriate.</b>		

**F. EMISSIONS UNIT POLLUTANTS  
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	010		EL
PM <sub>10</sub>	010		EL
SO <sub>2</sub>			EL
NO <sub>x</sub>			EL
CO			EL
VOC			EL
SAM			EL
TRS			EL
HAPs			NS
H001			NS
H021	010		NS
H095			NS
H106			NS
H115			NS

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions**

1. Pollutant Emitted: <b>PM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>75.6 lb/hour                      331.1 tons/year</b>	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      to      tons/year	
6. Emission Factor: <b>0.030 gr/dscf @ 8 percent O<sub>2</sub></b> Reference: <b>BACT</b>	7. Emissions Method Code: <b>0</b>
8. Calculation of Emissions (limit to 600 characters):  <b>0.030 gr/dscf x 294,000 dscfm x 60 min/hr ÷ 7,000 gr/lb = 75.6 lb/hr</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>0.030 gr/dscf @ 8 percent O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>75.6 lb/hour      331.1 tons/year</b>
5. Method of Compliance (limit to 60 characters):  <b>Annual stack test using EPA Methods 5, 17, or 29.</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>Based on Title V permit and PSD permit limit.</b>	



**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions**

1. Pollutant Emitted: <b>PM<sub>10</sub></b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>75.6 lb/hour                      331.1 tons/year</b>	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      to _____ tons/year	
6. Emission Factor: <b>0.030 gr/dscf @ 8 percent O<sub>2</sub></b> Reference: <b>BACT</b>	7. Emissions Method Code: <b>0</b>
8. Calculation of Emissions (limit to 600 characters):  <b>PM<sub>10</sub> limit equal to PM limit.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>0.030 gr/dscf @ 8 percent O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>75.6 lb/hour                      331.1 tons/year</b>
5. Method of Compliance (limit to 60 characters):  <b>Annual stack test using EPA Methods 5, 17, or 29.</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

**H. VISIBLE EMISSIONS INFORMATION**  
 (Only Regulated Emissions Units Subject to a VE Limitation)

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: <b>VE20</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: <b>20 %</b> Exceptional Conditions:      % Maximum Period of Excess Opacity Allowed:      min/hour	
4. Method of Compliance: <b>Annual VE test using EPA Method 9.</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>BACT</b>	

**I. CONTINUOUS MONITOR INFORMATION**  
 (Only Regulated Emissions Units Subject to Continuous Monitoring)

**Continuous Monitoring System:** Continuous Monitor 1 of 2

1. Parameter Code: <b>EM</b>	2. Pollutant(s): <b>TRS</b>
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information: Manufacturer: <b>Thermal Environmental Instrument, Inc.</b> Model Number: <b>Not Applicable</b> Serial Number: <b>Not Applicable</b>	
5. Installation Date: <b>Dec 2000</b>	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Monitor information describes equipment in operation. G-P reserves the right to replace this equipment as maintenance may require.</b>	

**H. VISIBLE EMISSIONS INFORMATION**  
 (Only Regulated Emissions Units Subject to a VE Limitation)

**Visible Emissions Limitation:** Visible Emissions Limitation \_\_\_\_\_ of \_\_\_\_\_

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: _____ %    Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

**I. CONTINUOUS MONITOR INFORMATION**  
 (Only Regulated Emissions Units Subject to Continuous Monitoring)

**Continuous Monitoring System:** Continuous Monitor 2 of 2

1. Parameter Code: O <sub>2</sub>	2. Pollutant(s):
3. CMS Requirement:	[ X ] Rule [ ] Other
4. Monitor Information: Manufacturer: <b>Thermal Environmental Instrument, Inc.</b> Model Number: <b>320B</b> Serial Number: <b>Not Applicable</b>	
5. Installation Date: Dec 2000	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Rule 62-296.404(5)(b)1.a. Monitor information describes equipment in operation. G-P reserves the right to replace this equipment as maintenance may require.</b>	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION  
(Regulated Emissions Units Only)****Supplemental Requirements**

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: <b>Part B</b> _____ <input type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NO <sub>x</sub> Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NO <sub>x</sub> Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION  
(All Emissions Units)**

**Emissions Unit Description and Status**

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <b>No. 4 Smelt Dissolving Tanks (2)</b></p>			
<p>4. Emissions Unit Identification Number: ID: <b>019</b></p>		<p><input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>	
<p>5. Emissions Unit Status Code: <b>A</b></p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code: <b>26</b></p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p><b>Emissions unit consists of two smelt dissolving tanks with a Venturi scrubber on each tank.</b></p>			

**Emissions Unit Control Equipment**

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

**Venturi scrubbers; one for each smelt dissolving tank**

2. Control Device or Method Code(s): **53**

**Emissions Unit Details**

1. Package Unit:	
Manufacturer:	Model Number:
2. Generator Nameplate Rating: MW	
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)****Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	<b>210,000</b>	<b>lb/hr BLS</b>
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	<b>24</b> hours/day	<b>7</b> days/week
	<b>52</b> weeks/year	<b>8,760</b> hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
	<b>BLS feed to the No. 4 Recovery Boiler as a 24-hr average.</b>	



**C. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)****List of Applicable Regulations**

- 62-296.320(4)(a)2. General Pollutant Emission Limiting Standards
- 62-296.320(4)(a)3.a.(ii) General Pollutant Emission Limiting Standards
- 62-296.320(4)(a)3.c. General Pollutant Emission Limiting Standards
- 62-296.320(4)(b) General Pollutant Emission Limiting Standards
- 62-296.404(2)(b) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(3)(d). Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(4)(c)1. Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(4)(c)3. Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(4)(f) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(5)(d) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(a) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(b) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(c)3. Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(c)4. Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(d) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-297.310 General Test Requirements
- 62-297.401(1)(a) EPA Method 1 - Sample and Velocity Traverses for Stationary Sources
- 62-297.401(2) EPA Method 2 - Determination of Stack Gas Velocity and Volumetric Flow Rate
- 62-297.401(3) EPA Method 3 - Gas Analysis for Carbon Dioxide, Oxygen, Excess Air, and Dry Molecular Weight
- 62-297.401(4) EPA Method 4 - Determination of Moisture Content in Stack Gases
- 62-297.401(5) EPA Method 5 - Determination of Particulate Emissions from Stationary Sources
- 62-297.401(9)(a) EPA Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources
- 62-297.401(16) EPA Method 16 - Semicontinuous Determination of Sulfur Emissions from Stationary Sources
- 62-297.401(16)(a) EPA Method 16A - Determination of Total Reduced Sulfur Emissions from Stationary Sources
- 40 CFR 63 - Subpart MM - NESHAPs for Chemical Recovery Combustion Sources, Kraft, Soda, Sulfite, and Stand Alone Semi-Chemical Pulp Mills

**D. EMISSION POINT (STACK/VENT) INFORMATION  
(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? <b>019</b>		2. Emission Point Type Code: <b>3</b>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):  <b>Two smelt dissolving tank vents, each with a venturi scrubber.</b>			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: <b>V</b>	6. Stack Height: <b>206</b> feet	7. Exit Diameter: <b>5</b> feet	
8. Exit Temperature: <b>180</b> °F	9. Actual Volumetric Flow Rate: <b>40,000</b> acfm	10. Water Vapor: <b>%</b>	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):  <b>There are two identical smelt dissolving tanks. Stack parameters are the same for each smelt dissolving tank.</b>			

**E. SEGMENT (PROCESS/FUEL) INFORMATION**  
(All Emissions Units)

**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>Pulp and Paper and Wood Products, Sulfate (Kraft) Pulping, Smelt Dissolving Tank: General.</b>		
2. Source Classification Code (SCC): <b>3-07-001-05</b>		3. SCC Units: <b>Tons Air-dried Unbleached Pulp Produced</b>
4. Maximum Hourly Rate: <b>118</b>	5. Maximum Annual Rate: <b>675,250</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):  <b>Maximum annual rate is based on maximum daily rate of 1,850 tons/day ADUP (monthly average).</b>		

**Segment Description and Rate:** Segment \_\_\_\_\_ of \_\_\_\_\_

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**F. EMISSIONS UNIT POLLUTANTS  
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	053		EL
PM <sub>10</sub>	053		EL
SO <sub>2</sub>			NS
NO <sub>x</sub>			NS
VOC			NS
TRS	053		EL
HAPs			NS
H095 (Formaldehyde)			NS
H115 (Methanol)			NS

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions**

1. Pollutant Emitted: <b>PM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>12.6</b> lb/hour <b>55.2</b> tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      to      tons/year	
6. Emission Factor: <b>0.12 lb/ton BLS</b> Reference: <b>BACT</b>	7. Emissions Method Code: <b>0</b>
8. Calculation of Emissions (limit to 600 characters):  <b>PM limit based on Title V permit and PSD permit.</b>  <b>0.12 lb/ton BLS x 105 tons/hr BLS = 12.6 lb/hr</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>0.12 lb/ton BLS</b>	4. Equivalent Allowable Emissions: <b>12.6</b> lb/hour <b>55.2</b> tons/year
5. Method of Compliance (limit to 60 characters):  <b>Annual stack test using EPA Method 5.</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>BACT.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions**

1. Pollutant Emitted: <b>PM<sub>10</sub></b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>12.6 lb/hour                      55.2 tons/year</b>	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3                      to                      tons/year	
6. Emission Factor: <b>0.12 lb/ton BLS</b> Reference: <b>BACT</b>	7. Emissions Method Code: <b>0</b>
8. Calculation of Emissions (limit to 600 characters):  <b>PM<sub>10</sub> limit based on PM emissions and BACT.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>0.12 lb/ton BLS</b>	4. Equivalent Allowable Emissions: <b>12.6 lb/hour                      55.2 tons/year</b>
5. Method of Compliance (limit to 60 characters):  <b>Annual stack test using EPA Method 5</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>BACT</b>	

**H. VISIBLE EMISSIONS INFORMATION**  
**(Only Regulated Emissions Units Subject to a VE Limitation)**

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: <b>VE20</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions:                      %    Exceptional Conditions:                      % Maximum Period of Excess Opacity Allowed:                      min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):  <b>Due to moisture interference, the visible emission limiting standard pursuant to F.A.C. Rule 62-296.320(4) is not applicable and is deferred to F.A.C. Rule 62-296.404(2)(b).</b>	

**I. CONTINUOUS MONITOR INFORMATION**  
**(Only Regulated Emissions Units Subject to Continuous Monitoring)**

**Continuous Monitoring System:** Continuous Monitor 1 of 2

1. Parameter Code: <b>FLOW</b>	2. Pollutant(s):
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: <b>Foxboro</b> Model Number: <b>2803-SABA-TSA-G</b> Serial Number: <b>5252373</b>	
5. Installation Date: <b>01 Dec 1976</b>	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Monitor information describes equipment in operation. G-P reserves the right to replace this equipment as maintenance may require.</b>	

**H. VISIBLE EMISSIONS INFORMATION**  
 (Only Regulated Emissions Units Subject to a VE Limitation)

**Visible Emissions Limitation:** Visible Emissions Limitation \_\_\_\_\_ of \_\_\_\_\_

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

**I. CONTINUOUS MONITOR INFORMATION**  
 (Only Regulated Emissions Units Subject to Continuous Monitoring)

**Continuous Monitoring System:** Continuous Monitor  2  of  2

1. Parameter Code: <b>FLOW</b>	2. Pollutant(s):
3. CMS Requirement:	[ X ] Rule [ ] Other
4. Monitor Information: Manufacturer: <b>Taylor</b> Model Number: <b>Not Applicable</b> Serial Number: <b>Not Applicable</b>	
5. Installation Date: <b>01 Dec 1976</b>	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Monitor information describes equipment in operation. G-P reserves the right to replace this equipment as maintenance may require.</b>	



**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION  
(Regulated Emissions Units Only)**

**Supplemental Requirements**

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: <b>Part B</b> _____ <input type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:          

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NO <sub>x</sub> Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NO <sub>x</sub> Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION**  
(All Emissions Units)

**Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <b>No. 4 Lime Kiln</b>			
4. Emissions Unit Identification Number: ID: <b>017</b>		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code: <b>A</b>	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: <b>26</b>	8. Acid Rain Unit? <input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			

**Emissions Unit Control Equipment**

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

**Venturi scrubber**

2. Control Device or Method Code(s): **53**

**Emissions Unit Details**

1. Package Unit:	
Manufacturer:	Model Number:
2. Generator Nameplate Rating:	MW
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	<b>140</b>	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	<b>See Comment</b>	
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:	<b>24</b> hours/day	<b>7</b> days/week
	<b>52</b> weeks/year	<b>8,760</b> hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p><b>Maximum Heat Input Rate based on 933 gal/hr of No. 6 fuel oil and 150,000 Btu/gal. Maximum Process/Throughput Rate: 82,986 lb/hr (CaCO<sub>3</sub> and inerts).</b></p>		

**C. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)****List of Applicable Regulations**

- 62-296.320(4)(a) General Pollutant Emission Limiting Standards
- 62-296.320(4)(b) General Pollutant Emission Limiting Standards
- 62-296.404(2)(b) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(3)(e) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(4)(b) Lime Kilns and Calciners
- 62-296.404(4)(f) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(5)(a) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(5)(b) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(a) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(b) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(c)2. Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-296.404(6)(d) Kraft (Sulfate) Pulp Mills and Tall Oil Plants
- 62-297.310 General Test Requirements
- 62-297.401(1)(a) EPA Method 1 - Sample and Velocity Traverses for Stationary Sources
- 62-297.401(2) EPA Method 2 - Determination of Stack Gas Velocity and Volumetric Flow Rate
- 62-297.401(3) EPA Method 3 - Gas Analysis for Carbon Dioxide, Oxygen, Excess Air, and Dry Molecular Weight
- 62-297.401(4) EPA Method 4 - Determination of Moisture Content in Stack Gases
- 62-297.401(5) EPA Method 5 - Determination of Particulate Emissions from Stationary Sources
- 62-297.401(7) EPA Method 7 - Determination of Nitrogen Oxide Emissions from Stationary Sources
- 62-297.401(7)(e) EPA Method 7E - Determination of Nitrogen Oxide Emissions from Stationary Sources
- 62-297.401(8) EPA Method 8 - Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources
- 62-297.401(10) EPA Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources
- 62-297.401(16) EPA Method 16 - Semicontinuous Determination of Sulfur Emissions from Stationary Sources
- 62-297.401(16)(a) EPA Method 16A - Determination of Total Reduced Sulfur Emissions from Stationary Sources
- 62-297.401(25) EPA Method 25 - Determination of Total Gaseous Nonmethane Organic Emissions as Carbon
- 62-297.401(25)(a) EPA Method 25A - Determination of Total Gaseous Organic Concentration Using a Flame Ionization Detector
- 40 CFR 63 - Subpart MM - NESHAPs for Chemical Recovery Combustion Sources, Kraft, Soda, Sulfite, and Stand Alone Semi-Chemical Pulp Mills

**D. EMISSION POINT (STACK/VENT) INFORMATION**  
**(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? <b>017</b>		2. Emission Point Type Code: <b>1</b>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: <b>V</b>	6. Stack Height: <b>131</b> feet	7. Exit Diameter: <b>4.4</b> feet	
8. Exit Temperature: <b>170</b> °F	9. Actual Volumetric Flow Rate: <b>64,000</b> acfm	10. Water Vapor: <b>34</b> %	
11. Maximum Dry Standard Flow Rate: <b>44,500</b> dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):  <b>Maximum Dry Standard Flow Rate is @ 10 percent O<sub>2</sub></b>			

**E. SEGMENT (PROCESS/FUEL) INFORMATION**  
(All Emissions Units)

**Segment Description and Rate:** Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>Pulp and Paper and Wood Products, Sulfate (Kraft) Pulping, Lime Kiln: General</b>		
2. Source Classification Code (SCC): <b>3-07-001-06</b>		3. SCC Units: <b>Tons Air-dried Unbleached Pulp Produced</b>
4. Maximum Hourly Rate: <b>118</b>	5. Maximum Annual Rate: <b>675,250</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):  <b>Maximum annual rate is based on maximum daily rate of 1,850 tons/day ADUP (monthly average).</b>		

**Segment Description and Rate:** Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>In-Process Fuel Use: Residual Oil, Lime Kiln</b>		
2. Source Classification Code (SCC): <b>3-90-004-03</b>		3. SCC Units: <b>Thousand Gallons Burned</b>
4. Maximum Hourly Rate: <b>0.933</b>	5. Maximum Annual Rate: <b>8,173</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: <b>2.35</b>	8. Maximum % Ash:	9. Million Btu per SCC Unit: <b>150</b>
10. Segment Comment (limit to 200 characters):  <b>Residual oil may include No. 6 fuel oil and on spec used oil.</b>		



**F. EMISSIONS UNIT POLLUTANTS  
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	053		EL
PM <sub>10</sub>	053		EL
SO <sub>2</sub>		053	EL
NO <sub>x</sub>			EL
CO			EL
VOC			EL
TRS			EL
PB			NS
HAPs			NS
H001 (Acetaldehyde)			NS
H095 (Formaldehyde)			NS
H115 (Methanol)			NS

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions**

1. Pollutant Emitted: <b>PM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>30.9 lb/hour                      135.3 tons/year</b>	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>0.081 gr/dscf @ 10 percent O<sub>2</sub></b> Reference: <b>BACT</b>	7. Emissions Method Code: <b>0</b>
8. Calculation of Emissions (limit to 600 characters):  <b>0.081 gr/dscf x 44,500 dscf/min x 60 min/hr ÷ 7,000 gr/lb = 30.9 lb/hr</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>0.081 gr/dscf @ 10 percent O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>30.9 lb/hour                      135.3 tons/year</b>
5. Method of Compliance (limit to 60 characters):  <b>Annual stack test using EPA Method 5.</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>Based on BACT.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions**

1. Pollutant Emitted: <b>PM<sub>10</sub></b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>30.9 lb/hour                      135.3 tons/year</b>	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3                      to                      tons/year	
6. Emission Factor: <b>0.081 gr/dscf @ 10 percent O<sub>2</sub></b> Reference: <b>BACT</b>	7. Emissions Method Code: <b>0</b>
8. Calculation of Emissions (limit to 600 characters):  <b>PM<sub>10</sub> limit based on PM emissions.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):  <b>Assume 100 percent of PM<sub>10</sub> = PM</b>	

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>0.081 gr/dscf @ 10 percent O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>30.9 lb/hour                      135.3 tons/year</b>
5. Method of Compliance (limit to 60 characters):  <b>Annual stack test using EPA Method 5</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>Based on BACT.</b>	

**H. VISIBLE EMISSIONS INFORMATION**  
 (Only Regulated Emissions Units Subject to a VE Limitation)

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: <b>VE20</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions:                      %   Exceptional Conditions:                      % Maximum Period of Excess Opacity Allowed:    min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):  <b>Due to moisture interference, the visible emission limiting standard pursuant to F.A.C. Rule 62-296.320(4) is not applicable and is deferred to F.A.C. Rule 62-296.404(2)(b).</b>	

**I. CONTINUOUS MONITOR INFORMATION**  
 (Only Regulated Emissions Units Subject to Continuous Monitoring)

**Continuous Monitoring System:** Continuous Monitor 1 of 2

1. Parameter Code: <b>EM</b>	2. Pollutant(s): <b>TRS</b>
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information: Manufacturer: <b>Thermal Environmental Instrument, Inc.</b> Model Number: <b>Not Applicable</b> Serial Number: <b>Not Applicable</b>	
5. Installation Date: <b>Dec 2000</b>	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Monitor information describes equipment in operation. GP reserves the right to replace this equipment as maintenance,</b>	

**H. VISIBLE EMISSIONS INFORMATION**  
**(Only Regulated Emissions Units Subject to a VE Limitation)**

**Visible Emissions Limitation:** Visible Emissions Limitation \_\_\_\_\_ of \_\_\_\_\_

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

**I. CONTINUOUS MONITOR INFORMATION**  
**(Only Regulated Emissions Units Subject to Continuous Monitoring)**

**Continuous Monitoring System:** Continuous Monitor 2 of 2

1. Parameter Code: O <sub>2</sub>	2. Pollutant(s):
3. CMS Requirement:	[ X ] Rule [ ] Other
4. Monitor Information: Manufacturer: <b>Thermal Environmental Instrument, Inc.</b> Model Number: <b>320B</b> Serial Number: <b>Not available</b>	
5. Installation Date: <b>Dec 2000</b>	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Rule 62-296.404(5)(a). Monitor information describes equipment in operation. G-P reserves the right to replace this equipment as maintenance may require.</b>	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION  
(Regulated Emissions Units Only)****Supplemental Requirements**

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: <b>Part B</b> _____ <input type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:          

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NO <sub>x</sub> Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NO <sub>x</sub> Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**PART B**

**SUPPLEMENTAL INFORMATION FOR  
CONSTRUCTION PERMIT APPLICATION**



## 1.0 INTRODUCTION

Georgia-Pacific Corporation (G-P) operates a Kraft pulp and paper mill located in Palatka, Florida. The facility operates one recovery boiler, two smelt dissolving tanks, a lime kiln, as well as other equipment used in the pulp and paper production processes at the facility. The facility is currently operating under Title V permit no. 1070005-014-AV, issued May 30, 2003.

The G-P Palatka facility is a major source of hazardous air pollutants (HAPs) and is subject to U.S. Environmental Protection Agency's (EPA) final rule promulgated on January 12, 2001, to require maximum achievable control technology (MACT) on Kraft and soda pulp mill recovery furnaces, smelt dissolving tanks, lime kilns and calciners; sulfite recovery furnaces and fluidized bed combustors; and semi-chemical liquor combustors. This rule is commonly referred to as the MACT II regulation. The rule is codified in Title 40, Part 63, Subpart MM of the Code of Federal Regulations (CFR).

The MACT II emission limitations are summarized in Table 1. The MACT II regulations allow an alternative particulate matter (PM) limit to be established using a "bubble" over the regulated sources. G-P is proposing to utilize the bubble alternative for meeting the PM emission limitations of Subpart MM. The purpose of this application is to present G-P's proposed plan to meet the MACT II requirements.

This attachment contains two additional sections. A description of the proposed project, including air emission estimates, is presented in Section 2.0. The air quality review requirements and source applicability of the proposed project in relation to regulatory requirements are discussed in Section 3.0.

## 2.0 G-P'S PROPOSED BUBBLE PLAN FOR PARTICULATE MATTER EMISSIONS

### 2.1 BACKGROUND

G-P operates a Kraft pulp and paper mill located in Palatka, Florida. The Mill consists of a batch digester system, multiple effect evaporator (MEE) system, condensate stripper system, recovery boiler and smelt dissolving tanks, lime kiln, tall oil plant, power boilers, and other equipment to produce finished paper products from virgin wood. The facility is currently operating under Title V permit no. 1070005-014-AV, issued May 30, 2003.

The affected MACT II sources at the G-P Mill consist of the No. 4 Recovery Boiler, the No. 4 Smelt Dissolving Tanks, and the No. 4 Lime Kiln. The MACT II PM emission limits applicable to these emissions units are as follows:

<b>Emissions Unit</b>	<b>Particulate Matter Limit</b>
No. 4 Recovery Boiler	0.044 gr/dscf @ 8% O <sub>2</sub>
No. 4 Smelt Dissolving Tanks	0.20 lb/ton BLS
No. 4 Lime Kiln	0.064 gr/dscf @ 10% O <sub>2</sub>

BLS = black liquor solids

gr/dscf = grains per dry standard cubic feet

Ref: 40 CFR 63.862(a)

However, G-P has the option to establish an alternative PM emission limit for each existing unit under a Mill-specific bubble (40 CFR 63.862(a)(1)(ii)). The use of the bubble requires demonstration by the applicant that the sum of the alternative emission limits for all affected sources will not exceed the sum of the individual PM emission limits for each source. The bubble can be utilized for all emission units operating more than 6,300 hours per year. Procedures for calculating the bubble limits are contained in 40 CFR 63.865(a).

## **2.2 BUBBLE PLAN**

According to 40 CFR 63.865(a), the overall bubble limit is calculated in terms of pounds of PM per ton (lb/ton) of black liquor solids (BLS) fired in the recovery system. To determine the overall PM limit, the PM limits for the individual emissions units must be determined. The individual PM limits for recovery furnaces and lime kilns are calculated by using the volumetric gas flow out the stack, corrected to the appropriate oxygen content, and using the grain loadings, as listed in Section 2.1 (0.044 gr/dscf at 8 percent O<sub>2</sub> for recovery furnaces and 0.064 gr/dscf at 10 percent O<sub>2</sub> for lime kilns). For smelt dissolving tanks, the individual PM limit is calculated based on the BLS firing rate to the recovery system and a factor of 0.20 lb/ton BLS.

For the G-P Mill sources, the maximum volumetric flow rates to be used in the bubble calculation were determined by considering the design gas flow rates based on historic permit applications, and by examining the last 5 years of stack test data. These data are presented in Tables 2 and 3. As shown, there is year-to-year variability in the flow rates. However, the test data demonstrated that the previously established design flow rates for the No. 4 Recovery Boiler and No. 4 Lime Kiln of

294,000 dscfm at 8 percent O<sub>2</sub> and 44,500 dscfm at 10 percent O<sub>2</sub>, respectively, are appropriate, as described in the accompanying letter to this application.

The calculated MACT II PM bubble limit for the G-P Mill, based on the design gas flow rates, is presented in Table 4. As shown, the overall bubble limit for PM is calculated to be 1.45 lbs/ton BLS.

G-P proposes to meet the overall PM limit by limiting the individual sources to the limits shown in Table 4. For the No. 4 Recovery Boiler, the proposed individual PM limit is 0.030 gr/dscf at 8 percent O<sub>2</sub>. This grain loading is the same as in the current Title V permit for the G-P Mill, but is lower than the individual MACT II limit for the recovery boiler. For the No. 4 Smelt Dissolving Tanks, the proposed individual limit is 0.12 lb/ton BLS. This limit is the same as in the current Title V permit for the G-P Mill, but lower than the individual MACT II limit for the smelt dissolving tanks. For the No. 4 Lime Kiln, the proposed individual PM limit is 0.081 gr/dscf at 10 percent O<sub>2</sub>. This grain loading is also the same as in the current Title V permit for the G-P Mill, but is higher than the individual MACT II limits for the lime kilns.

As shown in Table 4, these individual PM limits will result in an overall PM limit of 1.13 lb/ton BLS, which is lower than the calculated bubble limit of 1.45 lb/ton BLS. Therefore, the requirements of 63.865(a) will be met by G-P.

### **3.0 RELATION TO OTHER REGULATORY REQUIREMENTS**

#### **3.1 PREVIOUS BACT EMISSION LIMITS**

The No. 4 Recovery Boiler, No. 4 Smelt Dissolving Tanks, and the No. 4 Lime Kiln emission units were previously subject to prevention of significant deterioration (PSD) review in 1991, and underwent best available control technology (BACT) analysis. The BACT emission limits for PM, established during the PSD review process, are compared to the proposed bubble limits in Table 4. The associated air flow rates used in the PSD permitting process are also shown (294,000 dscfm for the Recovery Boiler, and 37,400 dscfm for the Lime Kiln).

As shown, the previous BACT limits for the recovery boiler and the lime kiln were set on the basis of grain loading. G-P is not proposing to change the grain loading limits established as BACT. However, the associated hourly emission rate for the No. 4 Lime Kiln is higher due to the higher design gas flow rate now experienced by the Lime Kiln. For this reason, G-P is also requesting that the previous PSD permit be modified to reflect the higher hourly PM emission rate for the No. 4 Lime Kiln.

G-P is not requesting any change to the No. 4 Recovery Boiler or the No. 4 Smelt Dissolving Tanks BACT emission rate for PM.

### **3.2 OTHER SUBPART MM REQUIREMENTS**

Subpart MM establishes emission standards, and requirements for monitoring, performance tests, recordkeeping and reporting for all affected sources. The requirements in Subpart MM must be complied with by March 13, 2004. These requirements are discussed in the following sections.

Subpart MM establishes emission standards for HAP metals and gaseous organic HAPs. Subpart MM regulates PM emissions as a surrogate parameter for HAPs. Method 5 or 29 in Appendix A of 40 CFR 60 must be used to determine compliance with this emission standard. No standards for gaseous organic HAP emissions from existing sources were established in Subpart MM.

Under Subpart MM, any recovery boiler, lime kiln, or smelt dissolving tank that is equipped with a wet scrubber ( *i.e.*, No. 4 Smelt Dissolving Tanks and No. 4 Lime Kiln) must be equipped with a continuous monitoring system that can be used to determine and record the pressure drop across the scrubber and the scrubbing liquid flow rate at least once every successive 15-minute period. The monitoring device used to continuously monitor the pressure drop across the scrubber must be certified by the manufacturer to be accurate within a gauge pressure of  $\pm 500$  pascals. The continuous monitoring device used to monitor the scrubber flow rate must be certified by the manufacturer to be accurate within  $\pm 5$  percent of the design scrubbing liquid flow rate. As required by Subpart MM, initial performance tests will be conducted to determine compliance. During these initial performance tests, the operating range for the monitored parameters will be established.

Recovery boilers or lime kilns equipped with an electrostatic precipitator (ESP) control device (*i.e.*, No. 4 Recovery Boiler) must install a continuous opacity monitoring system. The system must determine opacity at least once every successive 10-second period and calculate and record each successive 6-minute average opacity.

Under Subpart MM, G-P is required to develop and implement a startup, shutdown, and malfunction (SSM) plan. This plan will contain the specific procedures to be followed for operating and maintaining the sources during periods of startup, shutdown, and malfunction. The plan also needs to include a program for corrective action for malfunctioning control systems used to comply with the

standards of Subpart MM. The plan must also include procedures for responding to any process parameter that is inconsistent with previously established operating ranges. This includes procedures to determine and record the cause of the exceedance, the time that the exceedance began and ended, and corrective actions to be taken. Maintenance and inspection schedules must also be included in the startup, shutdown, and malfunction plan.

Following the compliance date, owners or operators of all affected sources are required to implement corrective action as specified in the startup, shutdown, and malfunction plan when any 3-hour average parameter value is outside the established operating range. Records must be maintained of any occurrence when corrective action is required.

The following records are also required for sources affected by Subpart MM standards:

- Records of parameter monitoring data, including any time that the operating parameters were inconsistent with established operating ranges with brief explanations of the cause, the time the deviation occurred, the corrective action taken, and the time corrective action was initiated and completed;
- Records and documentation of supporting calculations made for compliance determinations; and
- Records of monitoring parameter ranges established for each affected source.

As required by Subpart MM, G-P is subject to certain notification requirements of 40 CFR 63, Subpart A. These requirements include an initial notification to the enforcement authority. This notification must include the following information:

- The name and address of the owner or operator;
- The physical address of the affected source;
- Identification of the applicable standard and the source's compliance date;
- A brief description of the nature, size, design and method of operation of the source, including design capacity and identification of the HAP emission point(s); and
- A statement of whether the source is a major source or an area source.

The initial notification for the G-P mill was previously submitted to the Florida Department of Environmental Protection. Notification of performance tests 60 days prior to the testing, continuous monitoring performance evaluations, and compliance status are also required under Subpart A.

In addition to the reporting requirements of Subpart A, G-P is required to submit an excess emissions report on a quarterly basis for any 3-hour average parameter that is outside of the established operational range. If no exceedance occurred during the reporting period, then a semi-annual report stating that no exceedance occurred must be submitted.

As part of this project, G-P will implement the appropriate systems and procedures to comply with all Subpart MM standards by March 13, 2004. All required records will be maintained and reports will be submitted in a timely manner as required to maintain compliance.

Table 1. Emission Limits for Existing Kraft and Soda Mills, Georgia-Pacific Corp., Palatka Mill

Source Type	Particulate Matter	Gaseous Organics
<b>Kraft and soda recovery furnace</b>		
Existing	0.044 gr/dscf @8 % O <sub>2</sub>	No limits
New	0.015 gr/dscf @8 % O <sub>2</sub>	0.025 lb/ton BLS
<b>Smelt dissolving tank</b>		
Existing	0.2 lb/ton BLS	No limit
New	0.12 lb/ton BLS	No limit
<b>Lime Kiln</b>		
Existing	0.064 dscf @10% O <sub>2</sub>	No limit
New	0.01 dscf @10% O <sub>2</sub>	No limit
<b>Sulfite recovery unit</b>		
Existing	0.04 gr/dscf @8 % O <sub>2</sub>	Covered by MACT I
New	0.02 gr/dscf @8 % O <sub>2</sub>	Covered by MACT I
<b>Semi-chemical unit</b>		
Existing and New	No limit	2.97 lb/ton BLS or 90% reduction

Source: 40 CFR 63, Subpart MM.

Table 2. No. 4 Recovery Boiler Stack Test Data Summary, 1988-2003

Purpose of Test	Date	Run	Time	Process Rate			Oxygen (%)	Moisture (%)	Reported Flow Rates		Calculated Flow Rate from Reported Data (dscfm @ 8% O <sub>2</sub> )	Average Compliance Test Results	Variables Between Stack Test Results
				(dbs/dscf)	(dbs/dscf)	(dbs/dscf)			dscfm	dscfm			
PM	Mar-88	2	9:30-11:25	181,751	4.36		NR	27.20	411,141	179,067	NA		
		3	1:50-3:00	182,118	4.38		NR	26.55	436,880	193,950	NA		
		4	10:29-11:30	168,148	4.04		NR	28.02	396,271	172,875	NA		
		5	11:45-12:54	167,252	4.04		NR	29.61	425,722	180,431	NA		
PM	Feb 27, 1989	1	12:16-1:51	273,211	6.56		NR	26.84	405,736	179,311	NA		
		2	9:18-10:27	240,224	6.25		NR	26.22	392,602	175,624	NA		
		3	10:49-11:50	261,185	6.27		NR	26.78	396,195	177,211	NA		
PM	Feb 26, 1990	1		171,512	4.12		NR	20.32	366,338	200,100	NA		
		2		174,151	4.18		NR	22.23	388,911	214,732	NA		
		3		175,045	4.20		NR	18.57	366,217	202,740	NA		
SO2	Jul 30, 1993	1	9:50	206,408	4.81		8	26.3	402,000	176,000	176,000	177.29%	-3.49%
		2	11:15	206,908	4.97		8.5	26.3	400,000	173,000	166,536	166.536%	7.66%
		3	12:49	189,984	4.56		7	26.3	402,000	176,000	189,538	189.538%	
SO2	Sep 9, 1993	1	13:55	190,145	4.32		9.5	31.1	380,000	159,600	140,651	158.591	
		2	16:55	179,069	4.30		9	29.1	380,000	163,600	150,362	150.362%	6.97%
		3	19:50	171,507	4.11		7	23.9	370,000	169,000	182,000	182.000%	29.10%
		4	21:20	175,222	4.21		7	35.4	379,000	149,000	160,362	160.362%	6.65%
SO2	Oct 1993	1	11:20-12:20	187,850	4.51		5.5	22.8	396,000	192,000	228,923	218.111	
		2	12:20-13:20	202,112	4.85		5	22.4	397,000	196,000	241,211		5.08%
		3	13:15-14:15	180,495	4.23		4.8	21.9	398,000	196,600	214,206		5.66%
PM	Jul 3, 1998	1	11:45-13:05	194,500	4.67		3.1	27	459,424	184,921	249,123	252.091	
		2	14:00-15:14	187,200	4.49		3.2	29	427,360	186,323	255,188		2.45%
		3	15:45-17:00	192,400	4.62		3.4	28	426,963	186,108	251,962		1.14%
PM	May 11, 1999	1	11:25-13:00	196,450	4.72		4	22.8	442,823	193,237	252,653	211.019	
		2	14:10-15:36	192,660	4.51		4	22.9	412,296	177,414	232,043		-8.17%
		3	17:18-18:21	199,680	4.54		4	27.6	438,327	194,257	247,190		-2.04%
PM	April 11, 2000	1	12:30-14:02	187,094	4.75		4.7	17.1	484,365	219,232	290,640	302.363	
		2	14:25-15:33	200,387	4.81		4.6	17.8	487,292	239,965	302,231		0.27%
		3	15:27-16:57	196,448	4.71		4.6	18.4	495,938	241,665	304,870		1.64%
PM	April 24, 2000	1	15:15-15:25	NA	NA		4.4	17.9	460,156	226,915	289,753	293.094	
		2	17:05-17:15	NA	NA		3.1	17.9	458,849	226,014	291,888		1.40%
		3	18:20-18:30	NA	NA		4.7	17.9	464,554	228,824	295,711		2.06%
PM	Jul 11, 2001	1	11:20-12:30	NA	NA		3.0	19.7	451,905	218,152	290,211	281.392	
		2	13:14-14:40	NA	NA		4.6	17	457,419	223,699	297,251		2.56%
		3	14:54-16:25	187,136	4.19		4	22.8	456,276	211,122	276,643		-1.48%
PM	Jun 1, 2002	1	14:25-15:35	189,927	4.70		5	21.4	459,503	209,941	258,189	262.000	
		2	16:25-17:35	189,967	4.70		3.6	22.1	461,096	212,184	266,497		3.14%
		3	17:45-19:00	184,246	4.69		3.3	17.7	465,345	224,171	277,815		2.43%
SAM	Jan 12, 2003	1	12:04-13:10	192,133	4.57		3.8	15.8	440,883	221,167	292,242	288.500	
		2	13:25-14:14	191,111	4.55		3.8	16.1	436,721	221,603	291,123		1.11%
		3	14:48-15:19	144,231	4.66		4.8	16.3	452,221	225,237	281,721		1.35%
PM	Jan 12, 2003	1	16:15-17:45	194,122	4.62		4.8	16.2	434,365	213,224	293,275		4.22%
		2	17:55-19:12	195,632	4.55		5.0	14.2	462,111	219,167	284,296		4.15%
		3	19:15-20:25	198,285	4.59		5.0	11.6	432,889	218,134	284,100		4.40%

\*Reported\* means the test was done on the stack, not the burner.



Table 3. Lime Kiln Test Data Summary, 1998-2003

Purpose of Test	Date	Run	Time	Process Rate (TPH CaCO <sub>3</sub> and Inerts)	Oxygen (% dry)	Moisture (%)	Reported Flow Rates		Calculated Flow	Average Compliance Test Results	Variability Between Stack Test Results
							acfm	dscfm	Rate from Reported Data (dscfm @ 10% O <sub>2</sub> )		
CO, NOx SO2, VOC	1998	1	17:40-18:40	34.6	7.8	36.4	47,857	25,664	30,797	33,098	8.52% 13.89%
		2	19:05-20:05	37.2	7.6	33.1	48,330	27,436			
		3	20:26-21:26	39.8	6.9	35.5	50,239	27,364			
PM	1998	1	9:30-10:32		6.8	34.7	47,779	26,556	34,281	35,557	13.74% -2.58%
		2	11:05-12:08		6.4	35.2	53,965	29,377			
		3	13:10-14:13		6.4	36.6	46,562	25,163			
CO, NOx SO2, VOC	1999	1	14:00-15:20	34.3	5.6	33.8		28,177	39,448	36,979	-8.38% -10.39%
		2	18:45-19:45	34.6	7.30	34.5		29,018			
		3	20:45-21:45	34.2	7.6	35.4	52,974	29,018			
PM	1999	1	13:58-15:04	34.3	5.6	33.8	50,196	28,184	39,458	38,474	-3.57% -3.91%
		2	15:48-16:56	34.6	6.7	34.6	52,623	29,269			
		3	17:36-18:40	34.2	7.2	33.5	53,585	30,223			
PM CO, NOx SO2, VOC	2000	1	11:20-12:22		7.8	35.3	41,579	35,328	42,394	42,619	6.96% -5.36%
		2	13:35-14:37		6.4	35.3	62,299	34,233			
		3	15:20-16:23		8.4	35.2	63,554	35,025			
PM	2001	1	10:10-11:12		6.9	31.5	53,921	31,374	40,216	43,263	11.31% 11.42%
		2	13:05-14:07		7.1	29	58,528	35,424			
		3	14:36-15:38		7.1	28.9	58,622	35,461			
PM CO, NOx SO2, VOC	2002	1	17:20-18:25		7.3	37.1	60,823	32,273	40,195	38,323	-2.58% -11.39%
		2	18:45-19:50		5.9	38.3	54,738	28,526			
		3	20:05-21:15		6.7	37.6	52,049	27,398			
PM CO, NOx SO2, VOC	2003	1	8:45-9:50		6.2	27.9	54,570	33,553	45,144	42,783	-3.79% -11.90%
		2	10:25-11:30		6.5	29	54,252	32,949			
		3	11:50-13:05		8.2	28.9	56,147	34,179			

"Reported" means figure as shown in the stack test report.

Table 4. Proposed MACT II Bubble Limits for PM, Georgia-Pacific, Palatka, Florida

Emission Unit	Limit	Activity Factor	Equivalent PM Emissions	
			lb/hr	lb/ton BLS <sup>b</sup>
<u>Calculation of Overall PM MACT II Limit<sup>a</sup></u>				
No. 4 Recovery Boiler	0.044 gr/dscf @ 8% O <sub>2</sub>	294,000 dscfm	110.88	1.06
No. 4 Smelt Dissolving Tanks	0.20 lb/ton BLS	105 tons/hr BLS	21.00	0.20
No. 4 Lime Kiln	0.064 gr/dscf @ 10% O <sub>2</sub>	37,400 dscfm	20.52	0.20
Total			152.40	1.45
<u>G-P's Proposed Bubble Limits for PM<sup>a</sup></u>				
No. 4 Recovery Boiler	0.030 gr/dscf @ 8% O <sub>2</sub>	294,000 dscfm	75.60	0.72
No. 4 Smelt Dissolving Tanks	0.12 lb/ton BLS	105 tons/hr BLS	12.60	0.12
No. 4 Lime Kiln	0.081 gr/dscf @ 10% O <sub>2</sub>	44,500 dscfm	30.90	0.29
Total			119.10	1.13
<u>Existing BACT Limits<sup>c</sup></u>				
No. 4 Recovery Boiler	0.030 gr/dscf @ 8% O <sub>2</sub>	294,000 dscfm	75.6	0.72
No. 4 Smelt Dissolving Tanks	0.12 lb/ton BLS	105 tons/hr BLS	12.6	0.12
No. 4 Lime Kiln	0.081 gr/dscf @ 10% O <sub>2</sub>	37,400 dscfm	26.0	0.25
Total			114.17	1.09

<sup>a</sup> Activity factors for the No. 4 Lime Kiln reflect proposed revision to the maximum volumetric flow rate for this unit.

<sup>b</sup> Black liquor solids (BLS) rate is based on the permit limit of 210,000 lb/hr BLS for the No. 4 Recovery Boiler.

<sup>c</sup> Based on: No. 4 Recovery Boiler: permit No. AC54-266676/PSD-FL-226, dated Sep. 21, 1995.

No. 4 Smelt Dissolving Tanks: permit No. AC54-193841/PSD-FL-171, dated June 7, 1991.

No. 4 Lime Kiln: permit No. AC54-192551/PSD-FL-171, dated June 7, 1991.