

**NO₂ BART 24-Hour Short Term Emission Rates
at the Packaging Corporation of America
Valdosta, Georgia Mill**

Emission Unit	ISCST3 Modeling ID	Time Period	Maximum Rated Capacity		Max Fuel Use/time period		Max Emission Factor		lb/hour or time period	NO ₂ Emission Rate (g/sec)	Basis for Emission Rate
C.E. Combination Boiler			1.62	Mgal/hr	5.418	Mgal/24hr	47	lb/Mgal #6 Fuel Oil	254.65		Based on maximum daily No. 6 fuel oil usage for baseline period. Assume no control from Over-Fired Air Project.
243 MMBtu/hr					530.3	tons/24 hours	0.22	lb/MMBtu	1049.99		50% Bark moisture assumed for 4,500 Btu/lb
			<i>Total 24-hr Maximum Actual</i>						1304.64		based on bark firing for 19+ hrs and oil firing for 3+ hrs
			<i>Maximum Actual Hourly Average</i>						54.36	6.85	lb/hr and g/sec emission rates for 24-hour air quality modeling
			<i>Total 3-hr Maximum Actual</i>						228.42		based on oil firing for 3-hrs
			<i>Maximum Actual Hourly Average</i>						76.14	9.59	lb/hr and g/sec emission rates for 3-hour air quality modeling
Riley Bark Boiler			2.4	Mgal/hr	10.206	Mgal/24hr	47	lb/Mgal #6 Fuel Oil	479.68		Based on maximum daily fuel oil usage for baseline period. Assume no control from Over-Fired Air Project.
360 MMBtu/hr					785.7	tons/24 hours	0.22	lb/MMBtu	1555.69		50% Bark moisture assumed for 4,500 Btu/lb
BART Source			<i>Total 24-hr Maximum Actual</i>						2035.37		based on bark firing for 19-hrs and oil firing for 4-hrs
			<i>Maximum Actual Hourly Average</i>						84.81	10.69	lb/hr and g/sec emission rates for 24-hour air quality modeling
			<i>Total 3-hr Maximum Actual</i>						338.40		based on oil firing for 3-hrs
			<i>Maximum Actual Hourly Average</i>						112.80	14.21	lb/hr and g/sec emission rates for 3-hour air quality modeling
C.E. Power Boiler Stack	CEPBS		1.2333	Mgal/hr	31.5252	Mgal/24hr	47	lb/Mgal #6 Fuel Oil			Based on maximum daily fuel oil usage for baseline period.
			<i>Total 24-hr Maximum Actual</i>						1391.16		
			<i>Maximum Actual Hourly Average</i>						57.97	7.30	lb/hr and g/sec emission rates for 24-hour air quality modeling
			<i>Total 3-hr Maximum Actual</i>						173.90		based on oil firing for 3-hrs
			<i>Maximum Actual Hourly Average</i>						57.97	7.30	lb/hr and g/sec emission rates for 3-hour air quality modeling
#1 Recovery Furnace Stack	#1RFS		249.4	MMBtu/hr	3.03	Mgal/24-hr	47	lb/Mgal #6 Fuel Oil			based on the maximum daily total Recovery Furnace fuel usage of 238.5 bbl/day and using a ratio of the heat inputs to distribute fuel usage.
					3.03	Mgal for 2-hr	47	lb/Mgal #6 Fuel Oil	142.41		
					473.00	Tons BLS/hr*22hr	0.1	lb/MMBtu	548.68		
			<i>Total 24-hr Maximum Actual</i>						691.09		based on BLS firing for 22-hrs and oil firing for 2-hrs
			<i>Maximum Actual Hourly Average</i>						28.80	3.63	lb/hr and g/sec emission rates for 24-hour air quality modeling
			<i>Total 3-hr Maximum Actual</i>						144.56		based on BLS firing for 1-hr and oil firing for 2-hrs
			<i>Maximum Actual Hourly Average</i>						48.19	6.07	lb/hr and g/sec emission rates for 3-hour air quality modeling
#2 Recovery Furnace Stack	#2RFS		249.4	MMBtu/hr	3.03	Mgal/24-hr	47	lb/Mgal #6 Fuel Oil			based on the maximum daily total Recovery Furnace fuel usage of 238.5 bbl/day and using a ratio of the heat inputs to distribute fuel usage.
					3.03	Mgal for 2-hr	47	lb/Mgal #6 Fuel Oil	142.41		
					473.00	Tons BLS/hr*22hr	0.1	lb/MMBtu	548.68		
			<i>Total 24-hr Maximum Actual</i>						691.09		based on BLS firing for 22-hrs and oil firing for 2-hrs
			<i>Maximum Actual Hourly Average</i>						28.80	3.63	lb/hr and g/sec emission rates for 24-hour air quality modeling
			<i>Total 3-hr Maximum Actual</i>						144.56		based on BLS firing for 1-hr and oil firing for 2-hrs
			<i>Maximum Actual Hourly Average</i>						48.19	6.07	lb/hr and g/sec emission rates for 3-hour air quality modeling
#3 Recovery Furnace Stack	#3RFS		324.8	MMBtu/hr	3.95	Mgal/24-hr	47	lb/Mgal #6 Fuel Oil			based on the maximum daily total Recovery Furnace fuel usage of 238.5 bbl/day and using a ratio of the heat inputs to distribute fuel usage.
BART Source					3.95	Mgal for 2-hr	47	lb/Mgal #6 Fuel Oil	185.65		
					622.60	Tons BLS/hr*22hr	0.1	lb/MMBtu	722.22		
			<i>Total 24-hr Maximum Actual</i>						907.87		based on BLS firing for 22-hrs and natural gas firing for 2-hrs
			<i>Maximum Actual Hourly Average</i>						37.83	4.77	lb/hr and g/sec emission rates for 24-hour air quality modeling
			<i>Total 3-hr Maximum Actual</i>						188.48		based on BLS firing for 1-hr and oil firing for 2-hrs
			<i>Maximum Actual Hourly Average</i>						62.83	7.92	lb/hr and g/sec emission rates for 3-hour air quality modeling
#1 Smelt Dissolving Tank Stack	#1SDTS				514.84	tons BLS/day	0	lb/ton BLS	0.00	0.00	0.016 lb/ton BLS & Title V Maximum Process Rate from Mill max 24-hr period throughput
			<i>3-hr Maximum Actual and 24-hr Maximum Actual</i>						0.00	0.00	based on incremental increase associated with the project
#2 Smelt Dissolving Tank Stack	#2SDTS				460.14	tons BLS/day	0	lb/ton BLS	0.00	0.00	0.016 lb/ton BLS & Title V Maximum Process Rate from Mill max 24-hr period throughput
			<i>3-hr Maximum Actual and 24-hr Maximum Actual</i>						0.00	0.00	based on incremental increase associated with the project
#3 Smelt Dissolving Tank Stack	#3SDTS				652.33	tons BLS/day	0	lb/ton BLS	0.00	0.00	0.016 lb/ton BLS & Title V Maximum Process Rate from Mill max 24-hr period throughput
BART Source			<i>3-hr Maximum Actual and 24-hr Maximum Actual</i>						0.00	0.00	based on incremental increase associated with the project
#4 Lime Kiln Stack	#4LKS		108	MMBtu/hr	15.16	Mgal/24-hr	47	lb/Mgal #6 Fuel Oil			based on the maximum daily total Lime Kiln fuel usage of 360.9 bbl/day and equates to 21 hours of oil firing at max heat input.
			fuel oil		0.72	Mgal/hr	47	lb/Mgal #6 Fuel Oil	710.64		This value is the sum of the daily emissions rate over a 21-hour period
			natural gas		0.10	MMcf/hr	0.6	lb/MMcf	0.19		3 hours per day of natural gas to make up 24 hours total.
			<i>Total 24-hr Maximum Actual</i>						710.83		Total emissions summed over 24-hours of 21 hours of oil and 3 hours of natural gas firing.
			<i>Maximum Actual Hourly Average</i>						29.62	3.73	Hourly average emissions based on fuel oil firing for 21-hrs and natural gas firing for 3-hrs.
			<i>Total 3-hr Maximum Actual</i>						101.52		Total emissions summed over 3-hours of oil firing.
			<i>Maximum Actual Hourly Average</i>						33.84	4.26	Hourly average emissions based on fuel oil firing for 3-hrs.
Non-Condensable Gas Incinerator Stack	NCGIS										
			<i>3-hr Maximum Actual and 24-hr Maximum Actual</i>		0.23	lb/ADTUBP	1550	ADTP per day	14.85	1.87	lb/hr and g/sec emission rates for 24-hour air quality modeling

**SO₂ BART 24-Hour Short Term Emission Rates
at the Packaging Corporation of America
Valdosta, Georgia Mill**

Emission Unit	ISCST3 Modeling ID	Time Period	Maximum Rated Capacity		Max Fuel Use/time period		Max Emission Factor		lb/hour or time period	SO ₂ Emission Rate (g/sec)	Basis for Emission Rate
C.E. Combination Boiler			1.62	Mgal/hr	5.418	Mgal/24hr	314	lb/Mgal #6 Fuel Oil	1701.25		Based on maximum daily fuel oil usage for baseline period. 2% Sulfur for No. 6 fuel oil. Assume 60% control per PCA.
243 MMBtu/hr					530.3	tons/24 hours	0.075	lb/ton bark	39.77		
			Total 24-hr Maximum Actual						1741.02		based on bark firing for 19+hrs and oil firing for 3+hrs
			Maximum Actual Hourly Average						29.02	3.66	lb/hr and g/sec emission rates for 24-hour air quality modeling
			Total 3-hr Maximum Actual						1526.04		based on oil firing for 3-hrs
			Maximum Actual Hourly Average						203.47	25.64	lb/hr and g/sec emission rates for 3-hour air quality modeling
Riley Bark Boiler			2.4	Mgal/hr	10.206	Mgal/24hr	314	lb/Mgal #6 Fuel Oil	3204.68		Based on maximum daily fuel oil usage for baseline period. 2% Sulfur for No. 6 fuel oil. Assume 60% control per PCA.
360 MMBtu/hr					785.7	tons/24 hours	0.075	lb/ton bark	58.93		
BART Source			Total 24-hr Maximum Actual						3263.61		based on bark firing for 19+hrs and oil firing for 4+hrs
			Maximum Actual Hourly Average						54.39	6.85	lb/hr and g/sec emission rates for 24-hour air quality modeling
			Total 3-hr Maximum Actual						2260.80		based on oil firing for 3-hrs
			Maximum Actual Hourly Average						301.44	37.98	lb/hr and g/sec emission rates for 3-hour air quality modeling
C.E. Power Boiler Stack	CEPBS		1.2333	Mgal/hr	31.5252	Mgal/24hr	157	lb/Mgal #6 Fuel Oil			Based on maximum daily fuel oil usage for baseline period. 1% Sulfur for No. 6 fuel oil will be used, therefore the PSD emission rate reflects the 1% value.
			Total 24-hr Maximum Actual						4647.07		based on bark firing for 20+hrs and oil firing for 4+hrs
			Maximum Actual Hourly Average						193.63	24.40	lb/hr and g/sec emission rates for 24-hour air quality modeling
			Total 3-hr Maximum Actual						580.88		based on oil firing for 3-hrs
			Maximum Actual Hourly Average						193.63	24.40	lb/hr and g/sec emission rates for 3-hour air quality modeling
#1 Recovery Furnace Stack	#1RFS	background	249.4	MMBtu/hr	3.03	Mgal/24-hr	314	lb/Mgal #6 Fuel Oil			based on the maximum daily total Recovery Furnace fuel usage of 238.5 bbl/day and using a ratio of the heat inputs to distribute fuel usage. 2% Sulfur for No. 6 fuel oil.
					3.33	Mgal for 2-hr	312.273	lb/Mgal #6 Fuel Oil	1038.41		
					473.00	Tons BLS/hr*22hr	1.76	lb/ton BLS	832.48		
			Total 24-hr Maximum Actual						1870.89		based on BLS firing for 22-hrs and oil firing for 2-hrs
			Maximum Actual Hourly Average						77.95	9.82	lb/hr and g/sec emission rates for 24-hour air quality modeling
			Total 3-hr Maximum Actual						1076.25		based on BLS firing for 1-hr and oil firing for 2-hrs
			Maximum Actual Hourly Average						358.75	45.20	lb/hr and g/sec emission rates for 3-hour air quality modeling
#2 Recovery Furnace Stack	#2RFS	background	249.4	MMBtu/hr	3.03	Mgal/24-hr	314	lb/Mgal #6 Fuel Oil			based on the maximum daily total Recovery Furnace fuel usage of 238.5 bbl/day and using a ratio of the heat inputs to distribute fuel usage. 2% Sulfur for No. 6 fuel oil.
					3.33	Mgal for 2-hr	312.273	lb/Mgal #6 Fuel Oil	1038.41		
					473.00	Tons BLS/hr*22hr	1.76	lb/ton BLS	832.48		
			Total 24-hr Maximum Actual						1870.89		based on BLS firing for 22-hrs and oil firing for 2-hrs
			Maximum Actual Hourly Average						77.95	9.82	lb/hr and g/sec emission rates for 24-hour air quality modeling
			Total 3-hr Maximum Actual						1076.25		based on BLS firing for 1-hr and oil firing for 2-hrs
			Maximum Actual Hourly Average						358.75	45.20	lb/hr and g/sec emission rates for 3-hour air quality modeling
#3 Recovery Furnace Stack	#3RFS		324.8	MMBtu/hr	3.95	Mgal/24-hr	314	lb/Mgal #6 Fuel Oil			based on the maximum daily total Recovery Furnace fuel usage of 238.5 bbl/day and using a ratio of the heat inputs to distribute fuel usage. 2% Sulfur for No. 6 fuel oil.
BART Source					4.33	Mgal for 2-hr	312.273	lb/Mgal #6 Fuel Oil	1352.35		
					622.60	Tons BLS/hr*22hr	1.76	lb/ton BLS	1095.78		
			Total 24-hr Maximum Actual						2448.13		based on BLS firing for 22-hrs and natural gas firing for 2-hrs
			Maximum Actual Hourly Average						102.01	12.85	lb/hr and g/sec emission rates for 24-hour air quality modeling
			Total 3-hr Maximum Actual						1402.16		based on BLS firing for 1-hr and oil firing for 2-hrs
			Maximum Actual Hourly Average						467.39	58.89	lb/hr and g/sec emission rates for 3-hour air quality modeling
#1 Smelt Dissolving Tank Stack	#1SDTS				514.84	tons BLS/day	0.016	lb/ton BLS	0.34	0.04	0.016 lb/ton BLS & Title V Maximum Process Rate from Mill max 24-hr period throughput
			3-hr Maximum Actual and 24-hr Maximum Actual						0.34	0.04	based on incremental increase associated with the project
#2 Smelt Dissolving Tank Stack	#2SDTS				460.14	tons BLS/day	0.016	lb/ton BLS	0.31	0.04	0.016 lb/ton BLS & Title V Maximum Process Rate from Mill max 24-hr period throughput
			3-hr Maximum Actual and 24-hr Maximum Actual						0.31	0.04	based on incremental increase associated with the project
#3 Smelt Dissolving Tank Stack	#3SDTS				652.33	tons BLS/day	0.016	lb/ton BLS	0.43	0.05	0.016 lb/ton BLS & Title V Maximum Process Rate from Mill max 24-hr period throughput
			3-hr Maximum Actual and 24-hr Maximum Actual						0.43	0.05	based on incremental increase associated with the project
#4 Lime Kiln Stack	#4LKS	background	108	MMBtu/hr	15.16	Mgal/24-hr	3.925	lb/Mgal #6 Fuel Oil			based on the maximum daily total Lime Kiln fuel usage of 360.9 bbl/day; 90% control efficiency per PCA
					0.72	Mgal/hr	314	lb/Mgal #6 Fuel Oil	226.08		This value is the maximum hourly fuel burning rate and the maximum hourly emission rate
					0.10	MMcf/hr	0.6	lb/MMcf	0.06		1.76 lb/ton BLS & Title V Maximum Process Rate of 21.5 ton/hr BLS
											1.76 lb/ton BLS & Title V Maximum Process Rate of 21.5 ton/hr BLS
			Total 24-hr Maximum Actual						4747.87		based on fuel oil firing for 3-hrs
			Maximum Actual Hourly Average						19.78	2.49	based on fuel oil firing for 22-hrs and natural gas firing for 2-hrs
			Total 3-hr Maximum Actual						678.24		based on incremental increase associated with the project
			Maximum Actual Hourly Average						22.61	2.85	based on incremental increase associated with the project
Non-Condensable Gas Incinerator Stack	NCGIS										40 TPY Permit Limit
			3-hr Maximum Actual and 24-hr Maximum Actual						9.13	1.15	based on incremental increase associated with the project using the No. 3 BSW