

APPENDIX A

Florida Department of Environmental Protection Division of Air Resource Management

Regional Haze Supplemental SIP – Facility Permits and Documentation

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Air Permit No. 1230001-121-AC
Permit Expires: December 31, 2024
Minor Air Construction Permit

Foley Mill
TRS Pre-Scrubber Media and Regional Haze Project

PROJECT

This is the final air construction permit, which authorizes the use of white liquor as an alternative scrubbing liquid in the total reduced sulfur (TRS) pre-scrubber used to control emissions of TRS and sulfur dioxide (SO₂) in the No. 1 Power Boiler and No. 1 Bark Boiler when low-volume, high-concentration (LVHC) non-condensable gases (NCG) are being combusted in the boilers. In addition, this permit establishes conditions to reduce SO₂ emissions from the existing Foley Mill in accordance with Florida's Regional Haze Plan. The proposed work will be conducted at the existing Foley Mill, which is a pulp mill categorized under Standard Industrial Classification No. 2611. The existing Foley Mill is in Taylor County at One Buckeye Drive in Perry, Florida. The UTM coordinates are Zone 17, 256.7 kilometers (km) East and 3,328.7 km North; Latitude: 30°04'3" North and Longitude: 83°31'41" West.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). Also, this permit addresses sulfur dioxide emissions as part of Florida's Regional Haze Plan pursuant to the requirements in 40 CFR 51.308. The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

David Lyle Read, P.E., Environmental Administrator
Permit Review Section
Division of Air Resource Management

Digitally signed by David Read
Date: 2023.10.20 12:37:03 -04'00'

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Thomas Pazdera, V.P. and General Manager, Foley Mill: Thomas.Pazdera@gapac.com

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Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

The Foley Cellulose LLC, Foley Mill, is an existing softwood Kraft Process Pulp Mill that manufactures market pulps and dissolving cellulose pulps consisting of the following major activities: two Kraft pulp mills, chemical recovery, causticizing, purification (*i.e.*, bleaching), papermaking, woodyard, and utility operations. The dissolving cellulose pulp produced at this plant is used in products such as food casings, rayon industrial cord, acetate fibers and plastics, as well as thickeners for personal care products, food and pharmaceuticals. The bleached market pulps are used in products such as disposable diapers, feminine hygiene products and incontinence products.

TABLE 1. THE EXISTING FACILITY CONSISTS OF THE FOLLOWING EMISSIONS UNITS (EU).

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
002	No. 1 Power Boiler
003	No. 2 Power Boiler
004	No. 1 Bark Boiler
006	No. 2 Recovery Furnace
007	No. 3 Recovery Furnace
011	No. 4 Recovery Furnace
019	No. 2 Bark Boiler
021	No. 2 Smelt Dissolving Tank
022	No. 3 Smelt Dissolving Tank
023	No. 4 Smelt Dissolving Tank
024	No. 4 Lime Kiln and Storage Bins
025	Lime Slakers
040	Tall Oil Processing
041	No. 2 Purification Plant
045	No. 1 Purification Plant
046	Pulping System
051	Line No. 3
052	Emergency Diesel Generators (266 Horsepower (HP) and (2) 51 HP)
053	Emergency Diesel Generators (365 HP and 111.3 HP)
054	Emergency Diesel Generator (235 HP)
<i>Unregulated Emissions Units and Activities</i>	
047	Facility-Wide Fugitive Emissions
048	Chemical Recovery Area
049	Drying and Converting Warehouse
050	Wood Yard

SECTION 1. GENERAL INFORMATION

PROPOSED PROJECT

The Foley Mill is requesting to use white liquor as an alternative scrubbing liquid in the TRS pre-scrubber. The TRS pre-scrubber is used to control emissions of TRS and SO₂ in the No. 1 Power Boiler and No. 1 Bark Boiler when LVHC NCG are being combusted. Also, as part of Florida's Regional Haze Plan, this permit reduces SO₂ emissions from the existing mill by:

- Optimizing the use of natural gas;
- Reducing the maximum sulfur content of No. 6 fuel oil;
- Removing tall oil from the fuel slate;
- Maintaining and appropriate pH level and flow in the existing wet scrubber on Bark Boiler No. 1; and
- Establishing a SO₂ emissions cap for the Nos. 2, 3, and 4 Recovery Furnaces.

TABLE 2. THE FOLLOWING EXISTING EU WILL BE AFFECTED BY THIS PROJECT.

EU No.	Description
002	No. 1 Power Boiler
004	No. 1 Bark Boiler
006	No. 2 Recovery Furnace
007	No. 3 Recovery Furnace
011	No. 4 Recovery Furnace
019	No. 2 Bark Boiler

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility operates units subject to New Source Performance Standards (NSPS) of Title 40 Code of Federal Regulations (CFR) Part 60.
- This facility operates units subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Permit Review Section in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Permit Review Section mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District at: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed, and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]
8. Source Obligation:
 - a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.[Rule 62-212.400(12), F.A.C.]
9. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation

SECTION 2. ADMINISTRATIVE REQUIREMENTS

permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050 and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. No. 1 Power Boiler & No. 1 Bark Boiler (EU 002 & EU 004)

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
002	No. 1 Power Boiler
004	No. 1 Bark Boiler
019	No. 2 Bark Boiler

No. 1 Power Boiler. The No. 1 Power Boiler has a maximum heat input rate of 249 million British thermal units per hour (MMBtu/hour) and is capable of producing 195,000 lb/hour of steam flow for Mill use. The boiler fires natural gas, No. 6 fuel oil, and on-specification (on-spec) used oil. The boiler serves as a backup combustion device to the No. 1 Bark Boiler for combustion of LVHC, NCG from the Pulping System MACT I (EU 046). The NCG are collected and routed to a TRS pre-scrubber prior to entering the boiler to control emissions of TRS compounds.

No. 1 Bark Boiler. The No. 1 Bark Boiler was designed with a nominal heat input rate of 300 MMBtu/hour (included for informational purposes only) and is capable of producing 200,000 lb/hour (24-hour average) of steam flow for Mill use. The boiler fires wood materials such as bark, chips, sawdust and other such wood fiber material, No. 6 fuel oil, facility generated on-spec used oil, and natural gas. The boiler is the primary control device used to combust LVHC NCG from the Pulping System MACT I (EU 046). The NCG are collected and typically routed through the spray nozzle-type TRS pre-scrubber to this boiler for destruction. Particulate matter (PM) emissions are controlled by a cyclone collector and a wet, Venturi scrubber. Water is utilized as the scrubbing media. Fly ash collected by the cyclone collector is recirculated back to the boiler. SO₂ emissions are controlled by internal absorption and partial removal in the wet, Venturi scrubber. Water flow rate and pH to the scrubber are adjusted to control SO₂ emissions from the scrubber. Following the scrubber is a chevron type demister (entrainment separator). Nitrogen oxide (NO_x) emissions are continuously monitored by a continuous emission monitoring system (CEMS). The boiler began operation in 1953.

No. 2 Bark Boiler is capable of producing 395,000 lb/hour of steam (24-hour average) and fires a variety of wood materials (bark, chips, sawdust, etc.) natural gas, No. 6 fuel oil, and facility-generated on-specification used oil. Flue gases are split into two streams. One stream flows through the economizer, wet venturi scrubber, demister and then out the stack. The other stream bypasses the economizer and goes directly to a cyclone collector and second wet venturi scrubber. Both scrubbers utilize water as the scrubbing media. Collected particulate is re-injected into the boiler. The bark boiler commenced operation in 1954.

The exhaust stack is a common stack that is shared with the No. 1 Power Boiler (EU 002), No. 2 Power Boiler (EU 003), No. 1 Bark Boiler (EU 004), and No. 2 Bark Boiler (EU 019). The nominal exhaust stack parameters for the stack (all four emission units, EP21), are: 13 feet in diameter; 225 feet in height; flow rate of 558,627 actual cubic feet per minute (acfm); and an exit temperature of 232 degrees Fahrenheit (°F).

{Permitting Note: These emission units are is regulated under Rule 62-212.400, F.A.C., PSD; Rule 62-296.404(3), F.A.C., Tall Oil Plants and Kraft (Sulfate) Pulp Mills; and Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less than 250 MMBtu/Hour Heat Input, New and Existing Emissions Units; NESHAP Subpart A, General Provisions, and Subpart DDDDD, NESHAP for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, of 40 CFR 63, adopted and incorporated by reference in Rule 62-204.800(11)(b) and (d), F.A.C. These boiler are also subject to NESHAP Subpart S, NESHAP from the Pulp and Paper Industry, for only the applicable requirements for controlling emissions from affected units subject to this rule, of 40 CFR 63, adopted and incorporated by reference in Rule 62-204.800(11)(b) and (d), F.A.C.; and NSPS Subpart A, General Provisions and Subpart BBa, Standard of Performance for Kraft Pulp Mill Affected Sources which Construction, Reconstruction, or Modification Commenced After May 23, 2013, for only the applicable requirements for controlling emissions from affected units subject to this rule, of 40 CFR 60, adopted and incorporated by reference in Rule 62-204.800(8)(b) and (c), F.A.C. The No. 1 Bark Boiler is also regulated under NSPS Subparts A, General Provisions, and Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, of 40 CFR 60, adopted and

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. No. 1 Power Boiler & No. 1 Bark Boiler (EU 002 & EU 004)

incorporated in Rule 62-204.800(8)(b) and (c), F.A.C.; and Compliance Assurance Monitoring (CAM), of 40 CFR 64, adopted and incorporated by reference in Rule 62-204.800, F.A.C. }

EXISTING PERMIT CONDITIONS

1. **Other Permits:** The conditions of this permit supplement all previously issued air construction and operation permits for this emission unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and the revised conditions supersede the original conditions cited in the permits stated below. Except for the modified conditions noted below, all other previously established permits and conditions remain in effect. [Rule 62-4.070, F.A.C.]

EQUIPMENT

2. **TRS Pre-Scrubber:** The permittee is authorized to use white liquor as an alternative scrubbing liquid in the TRS pre-scrubber. The pre-scrubber is used to control emissions of TRS and SO₂ in the No. 1 Power Boiler and No. 1 Bark Boiler when LVHC NCG are being combusted in the boilers. [Design, Application No. 1230001-121-AC]

TESTING REQUIREMENTS

3. **Initial Compliance Tests:** These emissions units shall be tested to demonstrate initial compliance with the specification for TRS removal efficiency. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. The rate of the white liquor used to meet the control efficiency of 50% or more for reducing TRS emissions shall be determined during the initial test. This shall be accomplished through simultaneous measurements of TRS immediately upstream and downstream of the pre-scrubber. Subsequent tests of TRS removal efficiency are not required. However, the Department may require special tests in accordance with Rule 62-297.310(8), F.A.C. [Rules 62-4.070(3) and 62-297.310(8)(b)1, F.A.C.; and Application No. 1230001-121-AC]
4. **Test Requirements:** The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(9), F.A.C.]

{Permitting Note: Air compliance test notifications can now be completed online in the Department's Business Portal. To access this online process, go to <http://www.fldepportal.com/go/home>.}

5. **Test Methods:** Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
16, 16A, 16B, 16C	Determination of TRS Emissions from Stationary Sources.

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800, F.A.C.; Appendix A of 40 CFR 60; and Application No. 1230001-121-AC]

RECORDS AND REPORTS

6. **Test Reports:** The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. For each test run, the report shall also indicate the average white liquor scrubbing flow rate. [Rule 62-297.310(10), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. No. 1 Power Boiler & No. 1 Bark Boiler (EU 002 & EU 004)

PERMITS BEING MODIFIED

The following permit condition is revised as indicated. Strikethrough is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight. Except for the modified condition noted below, all other previously established permits and conditions remain in effect.

Permit No. 1230001-077-AC, Subsection A

7. Specific Condition 7 (TRS Pre-Scrubber Parameter Monitoring). This condition is revised as follows:

7. TRS Pre-Scrubber Parameter Monitoring: While NCGs are directed to the No. 1 Power Boiler, weak wash from the lime mud washing system (scrubbing medium) shall be continuously added to the pre-scrubber at a minimum of 50 gallons per minute or white liquor shall be continuously added to the pre-scrubber at a minimum flow rate determined in the initial test based on a 3-hour average. This flow set point shall be continuously monitored and verified on an annual basis. Monitoring records shall be maintained and available for inspection by the Department. [Rule 62-4.070(3), F.A.C.; Permit No. 1230001-018-AC; and Application No. 1230001-121-AC]

{Permitting Note: After completion of the project and the initial pre-scrubber removal efficiency tests, the facility may update/modify the existing compliance assurance monitoring (CAM) plan for controlling SO2 emissions from the No. 1 Bark Boiler. The CAM plan for the No. 1 Bark Boiler could include a combination of monitoring the weak wash and white liquor addition rate to the pre-scrubber, the pH of the No. 1 Bark Boiler's Venturi scrubber, the flow rate of the Bark Boiler's Venturi scrubber or other appropriate parameters.}

NO. 1 POWER BOILER

8. Authorized Fuels: The No. 1 Power Boiler shall fire only natural gas except for periods of natural gas curtailment, pipeline disruptions, or physical mill problems that otherwise prevent the firing of natural gas in this unit. When necessary, liquid fuels may be fired during these exceptional periods. Tall oil is no longer an authorized fuel. Within one working day, the permittee shall notify the Compliance Authority of the inability to fire natural gas, the switch to liquid fuels, and the underlying cause that prevents gas firing. To determine compliance with this requirement, the permittee shall use the existing liquid fuel flow meters to monitor and record fuel usage. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]

9. Maximum Sulfur Content: For future additions of No. 6 fuel oil to the common tank, the maximum sulfur content shall be 1.02% by weight with compliance determined by maintaining records of fuel deliveries, analytical methods, and results of analysis. This specification is effective upon issuance of the final permit. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]

10. Limitation on Firing of LVHC NCG Gases: The No. 1 Power Boiler shall only combust the LVHC NCG gases when the No. 1 Bark Boiler is offline, unavailable to burn NCG gases, or as necessary for compliance with the requirements of 40 CFR 63, Subpart S or other rules such as monitoring for detectable leaks in a closed vent system. The permittee shall keep records of all times that the No. 1 Power Boiler is combusting LVHC NCG gases and the reason why the No. 1 Bark Boiler is unavailable as the primary control device. [Rule 62-4.070, F.A.C.; and Application No. 1230001-121-AC]

11. Fuel Sulfur Methods: The permittee shall determine sulfur content of each fuel based on the following sampling and analytical methods.

Table with 2 columns: Method, Description of Method and Comments. Rows include ASTM D2622 (Method for Sulfur in Petroleum Products by Wavelength Dispersive X-ray Fluorescence Spectrometry) and ASTM D4294 (Method for Sulfur Content).

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. No. 1 Power Boiler & No. 1 Bark Boiler (EU 002 & EU 004)

Method	Description of Method and Comments
ASTM D1298	Method for Density, Relative Density, or API Gravity of Crude Petroleum and Liquid Petroleum Products
ASTM D4057	Manual Sampling of Petroleum and Petroleum Products
ASTM D129, D1552	Method for Sulfur in Petroleum Products
ASTM D-240	Method for Heat of Combustion of Liquid Hydrocarbon Fuels
SW-846, Method 9038	Evaluating Solid Waste, Physical/Chemical

Other more recent or equivalent ASTM (American Society for Testing and Materials) methods or department-approved methods are also acceptable. No other methods may be used unless prior written approval is received from the Department. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]

12. **Fuel Oil Analysis:** At least once per month, a representative sample shall be taken from the common tank and analyzed to determine the fuel sulfur content. The sample shall be analyzed for the sulfur content using the methods specified in this permit. A certified vendor analysis of the sulfur content may be used to satisfy this requirement. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]
13. **Fuel Deliveries:** For each delivery of liquid fuel, the permittee shall record the amount of fuel delivered in gallons and the sulfur content of the fuel in percent sulfur by weight. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]
14. **Fuel Firing Records:** The permittee shall maintain a written or electronic log of the monthly usage of each fuel. The permittee shall document all periods of natural gas curtailment, pipeline disruptions, or physical mill problems that otherwise prevent the firing of natural gas in this unit. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]

NOS. 1 AND 2 BARK BOILERS

15. **Authorized Fuels:** The Nos. 1 and 2 Bark Boilers shall fire only wood materials and natural gas, except for periods of natural gas curtailment, gas pipeline disruptions, system readiness testing, or physical mill problems that otherwise prevent the firing of natural gas in this unit. When necessary, liquid fuels from the common tank may be fired during these exceptional periods. Tall oil is no longer an authorized fuel. Within one working day, the permittee shall notify the Compliance Authority of the inability to fire natural gas, the switch to liquid fuels, and the underlying cause that prevents gas firing. To determine compliance with this requirement, the permittee shall use the existing fuel flow meters to monitor and record fuel usage. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]
16. **Maximum Sulfur Content:** For future additions of No. 6 fuel oil to the common tank, the maximum sulfur content shall be 1.02% by weight with compliance determined by maintaining records of fuel deliveries, analytical methods, and results of analysis. This specification is effective upon issuance of the final permit. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]
17. **TRS Pre-Scrubber:** One year after the effective date of this permit, LVHC NCG gases shall be directed through the TRS pre-scrubber prior to combustion in the No. 1 Bark Boiler. The TRS Pre-Scrubber may be bypassed for maintenance purposes or due to malfunction or operational issues of the unit. The permittee shall document any period that exceeds one hour that the TRS pre-scrubber is not available when combusting LVHC NCG in No. 1 Bark Boiler, the reason why the TRS pre-scrubber is not available, and the corrective actions taken. [Rule 62-4.070, F.A.C.; and Application No. 1230001-121-AC]
18. **Wet Venturi Scrubber:** At all times that LVHC NCG or oil is fired in the No. 1 Bark Boiler, the Wet Venturi Scrubber shall be operational for minimization of SO₂ emissions. The Wet Venturi Scrubber shall meet the following parametric limits while oil or LVHC NCG are being fired: maintain a Ph of at least 8.0 (3-hour block average) and maintain a scrubber flow rate of at least 1,000 gallons per minute (gpm) (3-hour block average). [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. No. 1 Power Boiler & No. 1 Bark Boiler (EU 002 & EU 004)

19. Circumvention: The permittee shall not circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]
20. Fuel Sulfur Methods: The permittee shall determine sulfur content of each fuel based on the following sampling and analytical methods.

Method	Description of Method and Comments
ASTM D2622	Method for Sulfur in Petroleum Products by Wavelength Dispersive X-ray Fluorescence Spectrometry.
ASTM D4294	Method for Sulfur Content
ASTM D1298	Method for Density, Relative Density, or API Gravity of Crude Petroleum and Liquid Petroleum Products
ASTM D4057	Manual Sampling of Petroleum and Petroleum Products
ASTM D129, D1552	Method for Sulfur in Petroleum Products
ASTM D-240	Method for Heat of Combustion of Liquid Hydrocarbon Fuels
SW-846, Method 9038	Evaluating Solid Waste, Physical/Chemical

Other more recent or equivalent ASTM (American Society for Testing and Materials) methods or department-approved methods are also acceptable. No other methods may be used unless prior written approval is received from the Department. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]

21. Fuel Oil Analysis: At least once per month, a representative sample shall be taken from the common tank and analyzed to determine the fuel sulfur content. The sample shall be analyzed for the sulfur content using the methods specified in this permit. A certified vendor analysis of the sulfur content may be used to satisfy this requirement. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]
22. Wet Scrubber Parameter Monitoring: At all times that LVHC NCG or oil is fired, the permittee shall monitor the scrubber water pH in standard pH units using a pH probe and the water flow rate in gpm using a water flow rate sensor. Each monitoring device shall be located on the scrubber water supply line. Each monitoring device shall be calibrated at least once per year in accordance with the manufacturer's recommendations. Readings for each parameter recorded at least once every 15 minutes. Block hourly averages shall be calculated from the 15-minute readings recorded. Three-hour block averages shall be calculated from the hourly block averages. The permittee shall document any period exceeding one hour when the parameter monitors are not available, and any corrective actions taken. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]
23. Fuel Deliveries: For each delivery of liquid fuel, the permittee shall record the amount of fuel delivered in gallons and the sulfur content of the fuel in percent sulfur by weight. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]
24. Fuel Firing Records: The permittee shall maintain a written or electronic log of the monthly usage of each fuel. The permittee shall document all periods of natural gas curtailment, pipeline disruptions, system readiness testing, or physical mill problems that otherwise prevent the firing of natural gas in this unit. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]
25. Wet Scrubber Parameter Recordkeeping: The permittee shall record the 15-minute readings, the one-hour block average, and the three-hour block average in a written or electronic log of the scrubber water pH in standard pH units using a pH probe and the water flow rate in gpm using a water flow rate sensor. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

B. Nos. 2, 3, and 4 Recovery Furnaces (EU 006, EU 007 & EU 011)

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
006	No. 2 Recovery Furnace
007	No. 3 Recovery Furnace
011	No. 4 Recovery Furnace

No. 2 Recovery Furnace is a low-odor, non-direct contact evaporator unit that produces approximately 380,000 lb/hour of steam by firing black liquor. The furnace was originally constructed by Babcock & Wilcox in 1957 as a direct-contact evaporator design recovery furnace and later modified. Particulate matter emissions are controlled by an electrostatic precipitator. The exhaust stack is equipped with a CEMS to continuously monitor CO, NO_x, SO₂ and TRS. Opacity is continuously monitored by a COMS.

No. 3 Recovery Furnace is a low-odor non-direct contact evaporator unit that produces approximately 325,000 lb/hour of steam by firing black liquor. The furnace was originally constructed by Combustion Engineering in 1964 as a direct-contact evaporator design recovery furnace. Particulate matter emissions are controlled by an electrostatic precipitator. The exhaust stack is equipped with a CEMS to continuously monitor CO, NO_x, SO₂ and TRS. Opacity is continuously monitored by a COMS.

No. 4 Recovery Furnace is a low-odor non-direct contact evaporator unit that produces approximately 450,000 lb/hour of steam by firing black liquor. The furnace was originally constructed by Babcock & Wilcox in 1973 and began operation in 1974 with a membrane wall construction to minimize air in-leakage. Particulate matter emissions are controlled by an electrostatic precipitator. The exhaust stack is equipped with a CEMS to continuously monitor SO₂ and TRS. Opacity is continuously monitored by a COMS.

In addition to black liquor with a solids content ranging approximately between 65-72%, each recovery furnace is authorized to fire the following fuels for startup, shutdown, and as a supplemental fuel to maintain flame stability in the furnace: No. 6 fuel oil, No. 2 distillate oil, on-specification used oil, natural gas, ultra-low sulfur distillate oil, and methanol (Nos. 2 and 4 Recovery Furnace only).

EXISTING PERMIT CONDITIONS

1. Other Permits: The condition of this permit supplement all previously issued air construction and operation permits for these recovery furnaces. [Rule 62-4.070, F.A.C.]

EMISSIONS STANDARDS AND PERFORMANCE REQUIREMENTS

2. Authorized Fuels: The recovery furnaces shall fire black liquor as the primary fuel for recovery operations. Natural gas and authorized liquid fuels may be fired to supplement recovery operations when necessary. Tall oil is no longer an authorized fuel. To determine compliance with this requirement, the permittee shall use the existing fuel flow meters to monitor and record fuel usage. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]
3. Maximum Fuel Sulfur Content: For future additions of No. 6 fuel oil to the common tank, the maximum sulfur content shall be 1.02% by weight with compliance determined by maintaining records of fuel deliveries, analytical methods, and results of analysis. This specification is effective upon issuance of the final permit. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]
4. SO₂ Emissions Cap: Combined SO₂ emissions from the Nos. 2, 3, and 4 Recovery Furnaces shall not exceed the 3,200 tons per consecutive 12-operating months, rolled monthly. The first 12-operating month period begins January 1, 2024. An operating month is defined as a month where one, two or all three furnaces operate for a minimum of one cumulative hour. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

B. Nos. 2, 3, and 4 Recovery Furnaces (EU 006, EU 007 & EU 011)

TESTING REQUIREMENTS

5. Fuel Sulfur Methods: The permittee shall determine sulfur content of each fuel based on the following sampling and analytical methods.

Method	Description of Method and Comments
ASTM D2622	Method for Sulfur in Petroleum Products by Wavelength Dispersive X-ray Fluorescence Spectrometry.
ASTM D4294	Method for Sulfur Content
ASTM D1298	Method for Density, Relative Density, or API Gravity of Crude Petroleum and Liquid Petroleum Products
ASTM D4057	Manual Sampling of Petroleum and Petroleum Products
ASTM D129, D1552	Method for Sulfur in Petroleum Products
ASTM D-240	Method for Heat of Combustion of Liquid Hydrocarbon Fuels
SW-846, Method 9038	Evaluating Solid Waste, Physical/Chemical

Other more recent or equivalent ASTM (American Society for Testing and Materials) methods or department-approved methods are also acceptable. No other methods may be used unless prior written approval is received from the Department. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]

6. Fuel Oil Analysis: At least once per month, a representative sample shall be taken from the common tank and analyzed to determine the fuel sulfur content. The sample shall be analyzed for the sulfur content using the methods specified in this permit. A certified vendor analysis of the sulfur content may be used to satisfy these requirements. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]

CONTINUOUS EMISSIONS MONITORING REQUIREMENTS

7. SO₂ CEMS: An SO₂ CEMS shall be installed and operated to monitor and record SO₂ emissions from each recovery furnace. Each CEMS shall be calibrated and maintained to meet the quality assurance requirements of requirements specified in Appendix D of this permit including periodic Relative Accuracy Test Assessments (RATA). The monitoring data shall be used to demonstrate compliance with the SO₂ emissions caps specified in this permit and to report emissions for purposes of Title V fees. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]

RECORDS

8. Fuel Deliveries: For each delivery of liquid fuel, the permittee shall record the amount of fuel delivered in gallons and the sulfur content of the fuel in percent sulfur by weight. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]
9. Fuel Firing Records: The permittee shall maintain a written or electronic log of the monthly usage of each fuel. The permittee shall document all periods of natural gas curtailment, pipeline disruptions, or physical mill problems that otherwise prevent the firing of natural gas in this unit. [Rule 62-4.070, F.A.C.; Florida Regional Haze Plan; and Application No. 1230001-121-AC]

REPORTS

10. Engineering Study: The permittee shall have an engineering study conducted by an independent professional engineer to evaluate the following parameters for each recovery furnace: liquor sulfidity, liquor solids content, bed temperature, stack oxygen content, furnace load, auxiliary fuel use, sodium salt fume in the upper furnace, furnace design, and SO₂ emissions. The study shall collect parametric operating data for at least 400 hours on each recovery furnace. Based on an analysis of the data collected, the study shall determine which parameters, and which combination of parameters, have a significant impact on SO₂ emissions. The study shall recommend a set of parameters and appropriate operating ranges to minimize SO₂ emissions. A report summarizing the data collected and the results of the study shall be submitted to the Division of Air Resource

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

B. Nos. 2, 3, and 4 Recovery Furnaces (EU 006, EU 007 & EU 011)

Management within 18 months of restarting any of the recovery furnaces. [Rule 62-4.070, F.A.C.; and Application No. 1230001-121-AC]



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

PERMITTEE

WestRock CP, LLC
600 North 8th Street
Fernandina Beach, Florida 32034

Authorized Representative:
Daniel C. Rowland, General Manager

Air Permit No. 0890003-074-AC
Permit Expires: 12/31/2022
Minor Air Construction Permit
Fernandina Beach Mill
No. 7 Power Boiler Regional Haze Coal Records

PROJECT

This is the final air construction permit, which revises air construction Permit No. 0890003-072-AC to establish a coal usage recordkeeping requirement. The existing Fernandina Beach Mill is a paperboard mill and manufacturers corrugated and solid fiber boxes categorized under Standard Industrial Classification Nos. 2631 and 2653. The existing facility is in Nassau County at 600 North 8th Street in Fernandina Beach, Florida. The UTM coordinates are Zone 17, 356.2 kilometers (km) East and 3394.1 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

A handwritten signature in blue ink that reads "David Lyle Read, P.E." with a stylized flourish at the end.

Digitally signed by David Read
Date: 2021.12.16 10:40:17 -05'00'

David Lyle Read, P.E., Environmental Administrator
Office of Permitting and Compliance
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Daniel C. Rowland, General Manager, WestRock: Daniel.Rowland@westrock.com
Ms. Michele Rundlett, Environmental Manager, WestRock: Michele.Rundlett@westrock.com
Mr. Philip D. Cobb, P.E., Golder: PCobb@golder.com
Mr. Tom Kallemeyn, Program Administrator, NED: Tom.Kallemeyn@floridadep.gov
Mr. Stuart Bartlett, Environmental Consultant, NED: Stuart.Bartlett@floridadep.gov
Ms. Michelle Neeley, Program Manager, NED: Michelle.Neeley@floridadep.gov
Mr. Brian Durden, Program Manager, NED: Brian.Durden@floridadep.gov
EPA Region 4: R4TitleVFL@epa.gov
Ms. Elizabeth Walker, DEP OPC: Elizabeth.Walker@FloridaDEP.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



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Amy Hilliard
Date: 2021.12.16
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SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

WestRock CP, LLC operates a fully integrated Kraft linerboard mill (the Mill). The Mill produces linerboard from wood pulp and pulp derived from recycled corrugated containers, which is then sold to customers for converting into corrugated containers. The manufacturing processes at the Mill consists of the following major plant operations: wood yard, pulp mill, recycle plant, chemical recovery, powerhouse, and paper mill. A container plant (box plant) also operates onsite, converting linerboard into corrugated containers. The major fuel burning sources at the mill consist of two power boilers, two recovery boilers, and one lime kiln. The existing facility consists of the following emissions units (EU).

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
006	No. 5 Power Boiler
007	No. 4 Recovery Boiler
011	No. 5 Recovery Boiler
013	No. 4 Smelt Dissolving Tank
014	No. 5 Smelt Dissolving Tank
015	No. 7 Power Boiler
020	Tall Oil Plant
021	No. 4 Lime Kiln
033	Pulping System MACT I
035	Wide-web Flexographic Printers
038	John Deere 210 Brake Horsepower (BHP) Diesel Engine- Model JU6H-UF50
039	Caterpillar 292 BHP Diesel Engine– Model 3406c
040	Caterpillar 292 BHP Diesel Engine – Model 3406c
041	Coal Handling System
042	John Deere, Diesel Engine (125 BHP) – Model 6466DF-00
043	Wisconsin, Gasoline Engine (65 BHP) – Model V465D
045	D-Line Brownstock Washer System
046	D-Line Flare
<i>Unregulated Emissions Units and Activities</i>	
025	Wood yard
026	Brownstock Washing
028	Chemical Recovery Area
031	Secondary Fiber Pulp
032	Papermaking
044	Temporary Rental Package Boiler - 99.5 million British thermal unit/hour (MMBtu/hour)

PROPOSED PROJECT

WestRock requested to include recordkeeping requirements for the coal usage caps on the No. 7 Power Boiler that was established in Permit No. 0890003-072-AC to reduce sulfur dioxide (SO₂) emissions to comply with the EPA Regional Haze Program.

This project will modify the following emissions unit.

SECTION 1. GENERAL INFORMATION

EU No.	Emission Unit Description
015	No. 7 Power Boiler

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility operates units subject to the New Source Performance Standards (NSPS) of Title 40 Part 60 of the Code of Federal Regulations (40 CFR 60).
- The facility operates units subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northeast District Office at: 8800 Baymeadows Way West, Suite 100, Jacksonville, FL 32256-7590.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]
8. Source Obligation:
 - a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. No. 7 Power Boiler (EU 015)

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
015	No. 7 Power Boiler

The boiler has a maximum design heat input rate of 1,021 MMBtu/hour and a steam production rate of 770,000 lb/hour when firing coal. The boiler also fires oil and natural gas. The boiler serves as a backup to the kiln for destroying low-volume, high-concentration non-condensable gases from the batch digester system, continuous digester system, turpentine recovery system, evaporator systems, and foul condensate collection tank. PM emissions are controlled by an electrostatic precipitator.

{Permitting Note: This emission unit is regulated under NSPS Subpart A, General Provisions, and Subpart D, SOP for Fossil Fuel Fired Steam Generators for Which Construction Is Commenced After August 17, 1971, of 40 CFR 60, adopted and incorporated by reference in Rule 62-204.800(8)(b), F.A.C.; Rule 62-212.400(BACT), F.A.C., PSD; NESHAP Subpart A, General Provisions, and Subpart DDDDD, NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, as a pulverized coal/solid fossil fuel unit, of 40 CFR 63, adopted and incorporated by reference in Rule 62-204.800(8)(b), F.A.C.}

EXISTING PERMIT CONDITIONS

1. **Other Permits:** Except for the modified conditions noted below, all other previously established permits and conditions remain in effect. Unless otherwise specified, these revised conditions supersede the original conditions cited in the permits stated below. [Rule 62-4.070, F.A.C.]

PERMIT BEING MODIFIED

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight. Except for the modified conditions noted below, all other previously established permits and conditions remain in effect.

Permit No. 0890003-072-AC

Section 3, Subsection A. No. 7 Power Boiler (EU 015)

2. **New Specific Condition 5:** The following condition was added to the permit:

5. Coal Usage Records. Effective January 1, 2022.

- a. Records. For demonstrating compliance with the limitations on coal firing in Conditions 2 and 3, the permittee shall record the daily and 30-day rolling average coal usage for the No. 7 Power Boiler in units of tons/day for each calendar day, excluding days when natural gas curtailment or supply interruption occurs as defined in paragraph c of this condition. The 30-day rolling average shall be calculated as the arithmetic mean of the daily coal usage data for each proceeding 30 days during which there was not a natural gas curtailment or supply interruption. For purposes of the permit condition, the daily coal usage need not be recorded and the 30-day rolling average coal usage shall not be calculated for the days during which a natural gas curtailment or supply interruption occurred.
- b. Record Retention. The permittee shall retain records in suitable format for inspection for a period of 5-years from the date they are collected and make available upon request to the Department.
- c. Natural Gas Curtailment/Supply Interruption. 40 CFR 63 Subpart DDDDD defines natural gas curtailment and/or supply interruption occurs during periods of time which the supply of gaseous fuel to an affected boiler is restricted or halted for reasons beyond the control of the facility. The act of entering into a contractual agreement with a supplier of natural gas established for curtailment purposes does not constitute a reason that is under the control of a facility for the purposes of this definition. An increase in the cost or unit price of natural gas due to normal market fluctuations not

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. No. 7 Power Boiler (EU 015)

during periods of supplier delivery restriction does not constitute a period of natural gas curtailment or supply interruption. On-site gaseous fuel system emergencies or equipment failures qualify as periods of supply interruption when the emergency or failure is beyond the control of the facility.

[Rule 62-4.070(3), F.A.C.; Regional Haze SIP; and Application No. 0890003-074-AC]



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

PERMITTEE

WestRock CP, LLC
One Everitt Avenue
Panama City, Florida 32401

Authorized Representative:
Brett Tremblay, General Manager

Air Permit No. 0050009-047-AC
Permit Expires: December 31, 2023
Minor Air Construction Permit
Panama City Mill
SO₂ Emission Reduction Project

PROJECT

This is the final air construction permit to limit SO₂ emissions from the recovery and combination boilers at the referenced facility for the purpose of complying with the Environmental Protection Agency's (EPA) Regional Haze Program. The proposed work will be conducted at the existing Panama City Mill, which is a Kraft pulp and paper mill categorized under Standard Industrial Classification Nos. 2611 and 2621. The existing Panama City Mill is in Bay County at One Everitt Avenue in Panama City, Florida. The UTM coordinates are Zone 17, 632.8 kilometers (km) East and 3,335.1 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

A handwritten signature in black ink that reads "David Lyle Read". The signature is written in a cursive style.

Digitally signed by David Lyle Read
Date: 2023.06.07 08:09:44 -04'00'

David Lyle Read, P.E., Environmental Administrator
Office of Permitting and Compliance
Division of Air Resource Management

FINAL PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Brett Tremblay, General Manager, WestRock: Brett.Tremblay@WestRock.com

Corey Brandt, Senior Environmental Manager Air, WestRock: corey.brandt@westrock.com

DEP NWD Mailbox: EPOST_NWDWasteAir@dep.state.fl.us

EPA Region 4: R4TitleVFL@epa.gov

Ms. Amy Hillard, DEP OPC: Amy.Hillard@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



Digitally signed by

Amy Hilliard

Date: 2023.06.07

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SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY DESCRIPTION

WestRock CP, LLC, Panama City Mill (Mill), is an existing Kraft pulp and paper production facility located in Panama City, Florida. Wood is ground into chips and digested in a caustic solution to break down the lignin binding the cellulosic wood fibers. The wood fibers are washed, bleached and formed into paper or linerboard. The existing Mill is comprised of major activities areas such as: wood handling, pulping, bleaching, chemical recovery, powerhouse, paper machines, and associated processes and equipment. Steam and energy needed at the plant are met by the combination boilers, which burn bark/wood, primary residuals from the Wastewater Treatment Plant (WWTP), natural gas, No. 2 fuel oil, No. 6 fuel oil, and one of the combination boilers that fires coal. The existing facility consists of the following emissions units (EU).

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	No. 1 Recovery Boiler
019	No. 2 Recovery Boiler
015	No. 3 Combination Boiler
016	No. 4 Combination Boiler
021	No. 1 Smelt Dissolving Tank
020	No. 2 Smelt Dissolving Tank
004	Lime Kiln
026	Multiple Effect Evaporator System
027	Digester System
005	Lime Slaker
030	Woodyard
033	Bleach Plant
034	Pulping System
038	Petcoke Handling and Storage Silo
039	Emergency Reciprocating Internal Combustion Engines
041	Emergency Diesel Engines (261 horsepower (HP) and 48.81 HP)
042	Non-Emergency Diesel Engine (150 HP)
<i>Unregulated Emissions Units and Activities (see Appendix U, List of Unregulated Emissions Units and/or Activities)</i>	
031	Methanol Storage Tank*
032	Papermaking/Warehousing
035	Pulping Area General
037	Chemical Recovery Area

PROPOSED PROJECT

To reduce SO₂ emissions from the Mill, this project: 1) establishes a No. 2 fuel oil sulfur content limit of 0.75 percent (%) by weight applicable to the Nos. 3 and 4 combination boilers; 2) removes, after on-site reserves are expended, the use of No. 6 fuel oil in the Nos. 1 and 2 recovery boilers and the Nos. 3 and 4 combination boilers; and, 3) establishes a ton per day (TPD) coal usage limit for the No. 4 combination boiler. Establishing these restrictions will limit SO₂ emissions for the purpose of complying with the Environmental Protection Agency's (EPA) Regional Haze Program.

SECTION 1. GENERAL INFORMATION (FINAL)

Below EU affected by the project.

EU No.	Description
001	No. 1 Recovery Boiler
019	No. 2 Recovery Boiler
015	No. 3 Combination Boiler
016	No. 4 Combination Boiler

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the PSD of Air Quality.
- The facility does operate units subject to the New Source Performance Standards (NSPS) of Title 40 Part 60 of the Code of Federal Regulations (40 CFR 60).
- The facility does operate units subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northwest District at: 160 West Government Street, Suite 308, Pensacola, Florida 32502-5740.
3. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
4. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
5. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed, and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
6. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. No. 1 and No. 2 Recovery Boilers (EU 001 and EU 019)

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
001	No. 1 Recovery Boiler
019	No. 2 Recovery Boiler

The recovery boilers are direct contact evaporator recovery boilers that fire black liquor solids (BLS), natural gas, No. 2 fuel oil, and No. 6 fuel oil. Each recovery boiler has a maximum design BLS firing rate of 123,700 lb/hour based on 3,000 lb BLS per air dried unbleached pulp (lb/ADUBP). Each boiler is equipped with two induced draft fans and an electrostatic precipitator (ESP) to control emission of PM. Total reduced sulfur (TRS) emissions are reduced by a two-stage heavy black liquor oxidation system. Each stack is equipped with a CEMS to continuously monitor TRS and a continuous opacity monitoring system (COMS) to continuously measure opacity. High-Volume Low-Concentration (HVLC) non-condensable gases (NCG) from the No. 1 Brown Stock Washer System (BSWS) are collected and destroyed in either of the recovery boilers. The No. 1 Recovery Boiler began operation in 1970 and the No. 2 Recovery Boiler in 1971.

{These emission units are regulated under Rule 62-296.404, F.A.C., Kraft (Sulfate) Pulp Mills and Tall Oil Plants; Rule 62-296.405, F.A.C. Fossil Fuel Steam Generators with More Than 250 Million British Thermal Units per Hour (MMBtu/Hour) Heat Input, NESHAP Subpart A, General Provisions, and Subpart MM, NESHAP for Chemical Recovery Combustion Sources at Kraft Pulp Mills, of 40 CFR 63, adopted and incorporated in Rule 62-204.800(11)(b), F.A.C.; and NSPS Subpart BBa, SOP for Kraft Pulp Mill Affected Sources for Which Construction, Reconstruction, or Modification Commenced After May 23, 2013, of 40 CFR 60, adopted and incorporated in Rule 62-204.800(8)(b), F.A.C. for only the applicable requirements for controlling emissions from affected units subject this rule.}

EXISTING PERMIT CONDITIONS

1. Other Permits: The condition of this permit supplement all previously issued air construction and operation permits for these recovery boilers with regards to the use of No. 6 fuel oil in the Nos. 1 and 2 recovery boilers. [Rule 62-4.070, F.A.C.]

PERFORMANCE RESTRICTIONS

2. Method of Operations – No. 6 Fuel Oil. Upon issuance of this final permit, the permittee is authorized to continue firing No. 6 fuel oil in the Nos. 1 and 2 recovery boilers until the fuel storage on-site is exhausted. Once the fuel supply is exhausted, No. 6 fuel oil in no longer authorized to be fired in the recovery boilers. [Regional Haze SIP; Application No. 0050009-047-AC and Rule 62-210.200(PTE), F.A.C.]
3. Fuel Oil Sulfur Records. Records of each shipment of fuel oil shall be maintained and available for inspection by the Department. [Rules 62-4.070 and 62-210.200(PTE) F.A.C; Regional Haze SIP; and Application No. 0050009-047-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

B. No. 3 Combination Boiler (EU 015)

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
015	No. 3 Combination Boiler

The combination boiler has a maximum steam output of 330,000 lb/hour, equivalent to 505 MMBtu/hour, and burns wood, bark, primary clarified wood fibers, primary residuals from the WWTP, natural gas, No. 2 fuel oil, and No. 6 fuel oil. Off-gases from the condensate stripper are transported to the boiler for thermal destruction of TRS, HAP and volatile organic compounds (VOC). The No. 4 Combination boiler serves as a backup control device for this purpose. Both, No. 3 and No. 4 Combination Boilers serve as a backup control device to the lime kiln for the NCG from the Multiple Effect Evaporator (MEE) System and from the batch digester system. The boiler began operation in 1954.

{Permitting Note: This emission unit is regulated under Rule 62-296.410, F.A.C., Carbonaceous Fuel Burning Equipment; Rule 62-296.404, F.A.C., Kraft (Sulfate) Pulp Mills and Tall Oil Plants; Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 MMBtu/Hour Heat Input, New and Existing Emissions Units; NESHAP Subpart A, General Provisions, Subpart S, NESHAP for Pulp and Paper Industry, and Subpart DDDDD, NESHAP for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, for hybrid suspension grate boilers, of 40 CFR 63, adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C.; NESHAP Subpart A, General Provisions, and Subpart E, National Emissions Standard for Mercury, of 40 CFR 61, adopted and incorporated in Rule 62-204.800, F.A.C.; 40 CFR 64, CAM; and NSPS Subpart A, General Provisions, and Subpart BB, SOP for Kraft Pulp Mills, of 40 CFR 60, adopted and incorporated in Rule 62-204.800(8)(b), F.A.C. for only the applicable requirements for controlling emissions from affected units subject this rule.}

EXISTING PERMIT CONDITIONS

1. Other Permits: The condition of this permit supplement all previously issued air construction and operation permits for the No. 3 Combination Boiler with regards to the sulfur content of No. 2 fuel oil and the use of No. 6 fuel oil in the No. 3 combination boiler. [Rule 62-4.070, F.A.C.]

PERFORMANCE RESTRICTIONS

2. Method of Operations – Fuel Oil.
 - a. *No. 2 Fuel oil*. Maximum sulfur content of No. 2 fuel oil fired in the No. 3 combination boiler shall not exceed 0.75%, by weight. On-site blending of fuel oil to achieve the sulfur standard is prohibited.
 - b. *No. 6 Fuel Oil*. Upon issuance of this final permit, the permittee is authorized to continue firing No. 6 fuel oil in the No. 3 combination boiler until the fuel storage on-site is exhausted. Once the fuel supply is exhausted, No. 6 fuel oil in no longer authorized to be fired in the No. 3 combination boiler.

[Regional Haze SIP; Application No. 0050009-047-AC and Rule 62-210.200(PTE), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

C. No. 4 Combination Boiler (EU 016)

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
016	No. 4 Combination Boiler

The combination boiler has a maximum steam output of 330,000 lb/hour and burns wood, bark, primary clarified wood fibers, primary residuals from the WWTP, coal, natural gas, and/or No. 2 fuel oil or No. 6 fuel oil. The boiler serves as a backup control device to the lime kiln for the NCG from the MEE System and from the batch digester system. As a backup to the No. 3 Combination Boiler, condensate SOG is transported to the boiler for thermal destruction of HAP and TRS. HAP and TRS emissions are controlled by injecting the gases into the boiler in the flame zone with the primary fuel or with the combustion air. PM emissions are controlled by a fly ash arrestor, followed by a wet scrubber. SO₂ emissions are continuously monitored by a CEMS. The boiler began operation in 1965.

{Permitting Note: This emission unit is regulated under Rule 62-296.410, F.A.C., Carbonaceous Fuel Burning Equipment; Rule 62-296.404, F.A.C., Kraft (Sulfate) Pulp Mills and Tall Oil Plants; Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 MMBtu/Hour Heat Input, New and Existing Emissions Units; NESHAP Subpart A, General Provisions, Subpart S, NESHAP for Pulp and Paper Industry,, and Subpart DDDDD, NESHAP for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, for hybrid suspension grate boilers, of 40 CFR 63, adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C.; NESHAP Subpart A, General Provisions, and Subpart E, National Emissions Standard for Mercury, of 40 CFR 61, adopted and incorporated in Rule 62-204.800, F.A.C.; NSPS Subpart A, General Provisions, and Subpart BB, SOP for Kraft Pulp Mills, of 40 CFR 60, adopted and incorporated in Rule 62-204.800(8)(b), F.A.C.; and CAM of 40 CFR 64.}

EXISTING PERMIT CONDITIONS

1. Other Permits: The condition of this permit supplement all previously issued air construction and operation permits for the No. 3 Combination Boiler with regards to the sulfur content of No. 2 fuel oil and coal, the use of No. 6 fuel oil, and the amount of coal that can be fired daily in the No. 4 combination boiler. [Rule 62-4.070, F.A.C.]

PERFORMANCE RESTRICTIONS

2. Method of Operations – Fuel Oil.
 - a. *No. 2 Fuel oil*. Maximum sulfur content of No. 2 fuel oil fired in the No. 4 combination boiler shall not exceed 0.75%, by weight. On-site blending of fuel oil to achieve the sulfur standard is prohibited.
 - b. *No. 6 Fuel Oil*. Upon issuance of this final permit, the permittee is authorized to continue firing No. 6 fuel oil in the No. 4 combination boiler until the fuel storage on-site is exhausted. Once the fuel supply is exhausted, No. 6 fuel oil in no longer authorized to be fired in the No. 4 combination boiler.

[Regional Haze SIP; Application No. 0050009-047-AC and Rule 62-210.200(PTE), F.A.C.]

3. Method of Operations – Coal.

- a. *Sulfur Content*. Maximum sulfur content of coal fired in the No. 4 combination boiler shall not exceed 0.75%, by weight.
- b. *Daily Coal Usage*. The amount of coal that can be fired daily (midnight to midnight) in the No. 4 combination boiler shall be limited to 150 tons per day (TPD).

[Regional Haze SIP; Application No. 0050009-047-AC and Rule 62-210.200(PTE), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

C. No. 4 Combination Boiler (EU 016)

RECORDKEEPING

4. Coal Usage Records.

- a. *Records.* For demonstrating compliance with the limitations on coal firing in Condition **3**, the permittee shall record the coal fired daily (midnight to midnight) in the No. 4 combination boiler along with the coal's fuel sulfur content.
- b. *Record Retention.* The permittee shall retain records required by Condition **4.a** in suitable format for inspection for a period of 5-years from the date they are collected and make available upon request to the Department.

[Rule 62-4.070(3), F.A.C.; Regional Haze SIP; and Application No. 0050009-47-AC]



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Interim Secretary

PERMITTEE

JEA
1002 North Main Street
Jacksonville, FL 32206

Authorized Representative:
Kevin Holbrooks
Director, Environmental Compliance (Air and Lab)

Air Permit No. 0310045-59-AC
Permit Expires: June 30, 2023
Minor Air Construction Permit
Northside Generating Station
SO₂ Emission Limit Boiler Nos. 1 and 2

PROJECT

This is the final air construction permit that establishes a SO₂ emission limit based on the Mercury Air Toxics (MATS) Rule for Boiler Nos. 1 and 2 for the purpose of complying with the Environmental Protection Agency's (EPA) Regional Haze Program. The proposed work will be conducted at the existing Northside Generating Station, which is a power plant categorized under Standard Industrial Classification No. 4911. The existing facility is in Duval County at 4377 Heckscher Drive in Jacksonville, Florida. The UTM coordinates are Zone 17, 446.751 kilometers (km) East and 3,365.327 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); and Section 3 (Emissions Unit Specific Conditions). As noted in the Final Determination provided with this final permit, no changes were made to the draft permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000 and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

Digitally signed by David Lyle Read
Date: 2023.02.16 12:16:23 -05'00'

David Lyle Read, P.E., Environmental Administrator
Office of Permitting and Compliance
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Kevin Holbrooks, JEA: holbke@jea.com
Mr. Daniel N. Hlaing, P.E., JEA: hlaidn@jea.com
Ms. Kelsey B. Hope, P.E., JEA: hopekb@jea.com
DEP Northeast District Office: DEP_NED@dep.state.fl.us
Ms. Katie Miller, DEP Northeast District Office: Katie.Miller@floridadep.gov
Ms. Amy Hillard, DEP OPC: Amy.Hillard@FloridaDEP.gov
Hastings Read, DEP OPC: Hastings.Read@FloridaDEP.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



Digitally signed by Amy Hilliard
Date: 2023.02.16 13:19:37 -05'00'

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

Northside Generating Station (NGS) consists of three boilers (Boiler No. 3 and Circulating Fluidized Bed (CFB) Boiler Nos. 1 and 2) and four combustion turbines (CTs). Boiler No. 3 is an existing, pre-NSPS boiler coupled to a steam turbine-electrical generator (STEG) with a nominal rating of 564 megawatts (MW) and fired by natural gas, No. 6 fuel oil and used oil. NO_x emissions from Boiler No. 3 are controlled by low-NO_x burners.

CFB Boiler Nos. 1 and 2 are CFB boilers fired by coal, coal coated with latex, petroleum coke (petcoke), biomass and combinations of these fuels. Each CFB boiler is coupled to a STEG rated at 297.5 MW for a combined generating capacity of 595 MW. CFB combustion technology reduces the formation of NO_x while also achieving high combustion efficiency to reduce carbon monoxide (CO) and volatile organic compound (VOC) emissions. Each CFB boiler is equipped with a selective non-catalytic reduction (SNCR) system to reduce NO_x emissions, fabric filter to reduce particulate matter (PM) and particulate matter less than 10 microns in diameter (PM₁₀) emissions and dry limestone injection and a spray dryer absorber (SDA) polishing scrubber to reduce SO₂ emissions.

The four pre-NSPS distillate fuel oil-fired simple cycle CTs have a nominal rating of 52.5 MW each (210 MW total) and are referred to as CT Nos. 3, 4, 5 and 6. Emissions from CT Nos. 3, 4, 5 and 6, are controlled by firing low sulfur No. 2 fuel oil.

The NGS also includes coal, petroleum coke, biomass, limestone and fly ash handling activities, of which various control devices, control strategies and control techniques are required. The material handling and storage operations process ash, limestone, biomass, coal, coal coated with latex, and petroleum coke to support the operation of CFB Boiler Nos. 1 and 2. Each materials handling and storage operation employs one or more control strategies to limit emissions of particulate matter to meet specific emission limitations and/or visible emissions limits. The control strategies include the use of best operating/design practices, total or partial enclosures, conditioned materials, wet suppression, water sprays and dust collection systems.

Ancillary equipment includes 2 emergency engine-electrical generators, 2 diesel engines that service a black start generator and 3 emergency engine-fire pumps. Each emergency engine is fired with ultra-low-sulfur diesel (ULSD) fuel oil.

The NGS consists of the following regulated emissions units (EU).

EU No.	Emission Unit Description
<i>Regulated Emissions Units</i>	
003	Boiler No. 3
006	Combustion Turbine No. 3
007	Combustion Turbine No. 4
008	Combustion Turbine No. 5
009	Combustion Turbine No. 6
026	Circulating Fluidized Bed Boiler No. 2
027	Circulating Fluidized Bed Boiler No. 1
028	Materials Handling and Storage Operations
029	Crusher House/Building Baghouse Exhaust (DC1)
031	Fuel Silos Dust Collectors (DC2 and DC3)
033	Limestone Dryer/Mills Building
034	Limestone Prep Building Dust Collectors
035	Limestone Silos Bin Vent Filters
036	Fly Ash Transport Blower Discharge
037	Fly Ash Silos Bin Vents

SECTION 1. GENERAL INFORMATION

EU No.	Emission Unit Description
038	Bed Ash Silos Bin Vents
051	Fly Ash Slurry Mix System Vents
053	Bed Ash Surge Hopper Bin Vents
055	Emergency Generator Diesel Engines (Diesel Engine Nos. 1 and 2)
056	Black Start Engine Generator Diesel Engines (Diesel Engine Nos. 3 and 4)
057	Emergency Fire Pumps Diesel Engine Nos. 5 and 6

PROPOSED PROJECT

The purpose of this project is to establish a SO₂ emission limit for Boiler Nos. 1 and 2, based on the MATS Rule, for the purpose of complying with the EPA Regional Haze Program.

The following existing EUs will be affected by this project.

EU No.	Description
026	Circulating Fluidized Bed Boiler No. 2
027	Circulating Fluidized Bed Boiler No. 1

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the PSD of Air Quality.
- The facility operates units subject to the New Source Performance Standards (NSPS) of Title 40 Part 60 of the Code of Federal Regulations (40 CFR 60).
- The facility operates units subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the DEP Northeast District Office at: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256.
3. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
4. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
5. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed, and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
6. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]
7. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050 and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Boiler Nos. 1 and 2

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
026	CFB Boiler No. 2
027	CFB Boiler No. 1

These emissions units are two CFB boilers that fire varying combinations of natural gas, coal, coal coated with latex, petroleum coke and biomass. These boilers are connected to the existing steam turbines of the retired Boilers Nos. 1 and 2 (297.5 MW each) as part of the repowering project authorized under air construction permit, No. 0310045-003-AC/PSD-FL-265. Supporting equipment associated with operation of the CFB boilers include solid fuel delivery and storage facilities, limestone preparation and storage facilities (including three limestone dryers), aqueous ammonia storage, ash removal and storage facilities and an electrical substation. Exhaust from each CFB boiler exits a separate flue housed in a dual-flue stack that is 495 ft tall. Each CFB boiler flue has an exit diameter of 15 ft and exhausts gas at an exit temperature of 144°F and an actual stack gas flow rate is 700,000 acfm.

Each CFB boiler is equipped with an ACI system to control Hg emissions as needed, an SNCR system to reduce NO_x emissions, limestone injection and an SDA to reduce SO₂ emissions and a fabric filter to reduce particulate matter (PM & PM₁₀) emissions. CFB combustion technology further reduces NO_x formation by operating within a temperature range that minimizes the formation of thermal NO_x. CO and VOC emissions are controlled by achieving high fuel combustion efficiency.

CFB boiler Nos. 1 and 2 began operation in February 2002 and May 2002, respectively.

{Permitting Note: These emissions units are regulated under: 40 CFR 60, Subpart A, General Provisions and Subpart Da, Standards of Performance for Electric Utility Steam Generating Units, adopted by reference in Rule 62-204.800(8)(d) and (8)(b)2., F.A.C., respectively; 40 CFR 63, Subpart A, General Provisions, and 40 CFR 63, Subpart UUUUU, NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units, adopted by reference in Rule 62-204.800(11)(d)1. and (b)102., F.A.C., respectively; Rule 62-212.400, F.A.C., BACT for CO, NO_x, PM, PM₁₀, VOC, Mercury (Hg) and total fluorides (HF); and Chapter 62-214, F.A.C., the Phase II Acid Rain Program as Specified in Section IV of this Permit. When firing petroleum coke, up to 240 tons per day of biomass in each unit, and natural gas, these emission units still meet the definition of "coal-fired electric utility steam generating units", as defined in 40 CFR 63.10042 because they burn coal for more than 10.0 percent of the average annual heat input during any 3 consecutive calendar years or for more than 15.0 percent of the annual heat input during any one calendar year. The permittee shall comply with all applicable provisions of NESHAP Subpart UUUUU for coal-fired electric utility steam generating units while the CFBs are defined as such but may conduct performance tests in accordance with NESHAP Subpart UUUUU in order to be reclassified as low emitting electric utility steam generating units (LEEs) for PM and Hg.}

PREVIOUS APPLICABLE PERMITS

1. Other Permits: The conditions of this permit supplement all previously issued air construction permits. Unless otherwise specified in this subsection, these emissions units remain subject to the applicable requirements established in all previous air construction permits. [Rule 62-4.070(3), F.A.C.]

NEW CONDITION REALTED TO EPA REGIONAL HAZE RULE

2. New MATS Based SO₂ Emission Limit: As determined by CEMS data, SO₂ emissions shall not exceed 0.20 lb/MMBtu based on a heat input-weighted 30-boiler operating day rolling average. Compliance shall be demonstrated as determined in 40 CFR 63.10021(a) and (b) of the MATS rule. [40 CFR 63.10021(a) & (b)]
{Permitting Note: The above new SO₂ emission limit becomes effective upon issuance of a final permit.}



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

NOTICE OF ADMINISTRATIVELY CORRECTED AIR CONSTRUCTION PERMIT

In the Matter of a Request for Administrative Correction:

JEA
1002 North Main Street
Jacksonville, FL 32206

Project No. 0310045-062-AC
Administrative Correction to:
Permit No. 0310045-057-AC
Duval County

Authorized Representative:
Mr. Kevin Holbrooks, Director, Environmental
Compliance (Air & Lab)

Dear Mr. Holbrooks,

Enclosed is an administrative correction for Air Construction Permit No. 0310045-057-AC for Northside Generating Station, which is in Duval of County at 4377 Heckscher Drive in Jacksonville, Florida. This action establishes addition recordkeeping requirements for Unit 3 as part of the Regional Haze SO₂ Reduction Project. Specifically, fuel oil records for each shipment shall be maintained and available for inspection by the Department.

This administrative correction is issued pursuant to Rule 62-210.360, Florida Administrative Code (F.A.C.), and Chapter 403, Florida Statutes (F.S.). This corrective action does not alter the effective dates of the existing permit.

The Department of Environmental Protection (Department) will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions must be filed within 14 days of receipt of this administratively corrected permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's

NOTICE OF ADMINISTRATIVELY CORRECTED AIR CONSTRUCTION PERMIT

proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Extension of Time: Under Rule 62-110.106(4), F.A.C., a person whose substantial interests are affected by the Department's action may also request an extension of time to file a petition for an administrative hearing. The Department may, for good cause shown, grant the request for an extension of time. Requests for extension of time must be filed with the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, or via electronic correspondence at Agency_Clerk@dep.state.fl.us, before the deadline for filing a petition for an administrative hearing. A timely request for extension of time shall toll the running of the time period for filing a petition until the request is acted upon.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Finality of Permitting Action: You cannot justifiably rely on the finality of this decision unless notice of this decision and the right of substantially affected persons to challenge this decision has been duly published or otherwise provided to all persons substantially affected by the decision. While you are not required to publish notice of this action, you may elect to do so pursuant Rule 62-110.106(10)(a).

Executed in Tallahassee, Florida.



Digitally signed by David Read
Date: 2023.08.24 08:10:45 -04'00'

David Lyle Read, P.E., Environmental Administrator
Permit Review Section
Division of Air Resource Management

DLR

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Administratively Corrected Permit (including the corrected page) or a link to these documents made available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested to the persons listed below:

Mr. Kevin Holbrooks, JEA: holbke@jea.com
Mr. Daniel N. Hlaing, P.E., JEA: hlaidn@jea.com
Ms. Kelsey B. Hope, P.E., JEA: hopekb@jea.com
DEP Northeast District Office: DEP_NED@dep.state.fl.us
Ms. Katie Miller, DEP Northeast District Office: Katie.Miller@floridadep.gov
DEP Siting Coordination Office: SCO@dep.state.fl.us
Ms. Amy Hillard, DEP OPC: Amy.Hillard@FloridaDEP.gov

NOTICE OF ADMINISTRATIVELY CORRECTED AIR CONSTRUCTION PERMIT

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



Digitally signed by Amy Hilliard
Date: 2023.08.24 11:04:27 -04'00'

NOTICE OF ADMINISTRATIVELY CORRECTED AIR CONSTRUCTION PERMIT

The following permit condition (III.A.7) is added to the referenced permit. Double underlines are used to denote the addition of text. All changes are emphasized with shading.

Permit Being Administratively Corrected: Permit No. 0310045-057-AC

Affected Emissions Unit: 003 (Boiler No. 3)

7. Fuel Oil Sulfur Records: Records of each shipment of fuel oil shall be maintained and available for inspection by the department. [Rules 62-4.070 and 62.210.200(PTE) F.A.C; and regional Haze SIP]



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

FPERMITTEE

White Springs Agricultural Chemicals, Inc.
15843 Southeast 78th Street
White Springs, Florida 32096

Authorized Representative:
Jeffrey Joyce, General Manager

Air Permit No. 0470002-132-AC
Permit Expires: December 31, 2022
Minor Air Construction Permit
Suwannee River and Swift Creek Complex
SO₂ Cap SAP E and F

PROJECT

This is the final air construction permit, which establishes a pound per hour (lb/hr) sulfur dioxide (SO₂) emission cap on Sulfuric Acid Plant (SAP) E and F at the White Springs Agricultural Chemicals, Inc. Suwannee River and Swift Creek Complex. The Suwannee River and Swift Creek Complex is an existing phosphate fertilizer production facility categorized under Standard Industrial Classification No. 2874. The existing facility is in Hamilton County at 15843 Southeast 78th Street in White Springs, Florida. The UTM coordinates are Zone 17, 328.3 kilometers (km) East and 3,368.8 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

Digitally signed by David Lyle Read
Date: 2022.09.22 13:28:50 -04'00'

David Lyle Read, P.E., Environmental Administrator
Permit Review Section
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Jeffrey Joyce, White Springs Agricultural: jeffrey.joyce@nutrien.com

Mr. Keith Knelle, White Springs Agricultural: keith.knelle@nutrien.com

Mr. Stan Posey, White Springs Agricultural: Stan.Posey@nutrien.com

Ms. Veronica N. Sgro, P.E., Koogler and Associates, Inc.: svsgro@kooglerassociates.com

DEP Northeast District Office: DEP_NED@dep.state.fl.us

Ms. Amy Hilliard, DEP PRS: Amy.Hilliard@FloridaDEP.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



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Date: 2022.09.22 15:01:43 -04'00'

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

The Suwannee River and Swift Creek Complex (SRSCC) processes phosphate rock to produce several products. The facility consists of two phosphoric acid plants, one monocal/dical process, two monoammonium/diammonium phosphate (MAP/DAP) plants, one Storage and Shipping building, one screening/shipping building, two sulfuric acid plants, two phosphoric acid filters, three superphosphoric acid plants, one green superphosphoric plant, and one acid clarification plant. The facility also has storage silos associated with the Swift Creek Mine.

The existing facility consists of the following emissions units (EU).

EU No.	Brief Description
004	“X”-Train (Monocal/Dical process)
008	“Y” Train-#1 MAP/DAP Plant
010	#1 Storage and Shipping Building
015	Granular Product Shipping and Screening Facility
020	“B” Phosphoric Acid Plant
032	“Z”-Train #2 MAP/DAP
034	South Phosphoric Acid Filter
035	North Phosphoric Acid Filter
036	“B” Superphosphoric Acid Plant
039	“C” Auxiliary Boiler
040	“D” Auxiliary Boiler
054	Molten Sulfur System
061	Green Superphosphoric Plant
066	“E” Sulfuric Acid Plant
067	“F” Sulfuric Acid Plant
068	“E” Auxiliary Boiler
069	“D” Phosphoric Acid Plant
070	“C” and “D” Superphosphoric Acid Plants
071	Acid Clarification Plant
072	Molten Sulfur System for “E” & “F” Sulfuric Acid Plants
075	Relocatable Concrete Batch Plant
076	13 Emergency Engines
077	Emergency Rental Boiler
079	Natural Gas 230 MMBtu/hour Auxiliary Boiler
080	Two 4.25 MMBtu/hour Boilers
081 & 082	Gypsum Dewatering Stack and Cooling Ponds
083	50 MMBtu/hour Boiler for Micronutrient Process

PROPOSED PROJECT

The proposed project will impose a sulfur dioxide (SO₂) emission cap on Sulfuric Acid Plant (SAP) E and F at the Suwannee River and Swift Creek Complex.

This project will affect the following emissions units.

EU No.	Description
066	“E” Sulfuric Acid Plant
067	“F” Sulfuric Acid Plant

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).

SECTION 1. GENERAL INFORMATION

- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility operates units subject to the New Source Performance Standards (NSPS) of Title 40 Part 60 of the Code of Federal Regulations (40 CFR 60).
- The facility operates units subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Permit Review Section in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Permit Review Section mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northeast District Office at: 8800 Baymeadows Way W, Jacksonville, Florida 32256.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed, and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]
[Rule 62-212.400(12), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. SAP Nos. 10 and 11 (EU 004 and 005)

This section of the permit addresses the following emissions units.

EU No.	Description
066	"E" Sulfuric Acid Plant
067	"F" Sulfuric Acid Plant

The "E" Sulfuric Acid Plant utilizes the double absorption process to produce sulfuric acid and to control sulfur dioxide (SO₂) emissions. This emissions unit uses Brinks mist eliminators to control sulfuric acid mist (SAM) emissions. The Drying Tower is an all-alloy tower, and this unit has a single Heat Exchanger (as per the changes in Permit No. 0470002-065-AC). The plant is a 2750 tons per day of sulfuric acid plant (100% H₂SO₄ basis).

The "F" Sulfuric Acid Plant utilizes the double absorption process to produce sulfuric acid and to control sulfur dioxide (SO₂) emissions. This emissions unit uses Brinks mist eliminators to control sulfuric acid mist (SAM) emissions. The plant is a 2750 tons per day of sulfuric acid plant (100% H₂SO₄ basis).

{Permitting Notes: Both these emissions units are regulated under: NSPS 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid Plants, adopted and incorporated by reference in Rule 62-204.800(8)(b), F.A.C.; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) [PSD-FL-082]; Rule 296.402, F.A.C., Sulfuric Acid Plants; and, the Federal U.S. EPA Consent Decree, No. 14-707-BAJ-SCR entered between White Springs Agricultural Chemicals, Inc. and the U.S. Environmental Protection Agency (U.S. EPA).}

PREVIOUS APPLICABLE REQUIREMENTS

1. Effect on Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for these emissions units. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070(1) & (3), *Reasonable Assurance*, F.A.C.]

PERMITTED CAPACITIES

2. Permitted Capacities: The permitted capacities of the SAPs shall remain the same. [Application No. 0470002-132-AC; and Rule 62-4.070(1) & (3), *Reasonable Assurance*, F.A.C.]

SO₂ EMISSION LIMIT

3. SO₂ Emission Limit: Effective January 1, 2023, the following SO₂ emission cap applies to the combined CEMs-measured emissions from SAP E and SAP F: 840 lb/hr on 24-hour block averaging period (6:00 a.m. to 6:00 a.m.). The 24-hour block average (6:00 a.m. to 6:00 a.m.) does not include hours when both SAPs are not operating.
[Rule 62-4.030, *General Prohibition*, F.A.C.; and, Rule 62-4.210, *Construction Permits*, F.A.C.; and Application No. 0470002-132-AC.]

COMPLIANCE REQUIREMENTS

4. Initial Compliance: These emission units shall use certified SO₂ CEMS data to demonstrate initial compliance with the SO₂ emission cap given in **Specific Condition 3** of this subsection. [Rules 62-4.070(1) & (3), *Reasonable Assurance*, F.A.C.; and Application No. 0470002-132-AC.]
5. Recordkeeping: The permittee shall keep records of the initial and ongoing compliance demonstrations. The records shall include the SO₂ CEMS data along with the sulfuric acid production rate (TPH, tons per hour). Any reports shall be prepared in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(10), F.A.C.; and Application No. 0470002-132-AC.]
6. Ongoing Compliance: The permittee shall use certified SO₂ CEMS data to demonstrate continuous compliance with the SO₂ emission cap given in **Specific Condition 3** of this subsection. [Rules 62-4.070(1) & (3), *Reasonable Assurance*, F.A.C.; and Application No. 0470002-132-AC.]



FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

PERMITTEE

Mosaic Fertilizer, LLC
13830 Circa Crossing Drive
Lithia, Florida 33547

Appendix A-7

Air Permit No. 1050055-037-AC
Permit Expires: June 30, 2023
Minor Air Construction Permit
South Pierce Facility
SO₂ Emission Cap, SAP Nos. 10 & 11

Authorized Representative:
Dexter Day, General Manager

PROJECT

This is the final air construction permit, which establishes a pound per hour (lb/hr) sulfur dioxide (SO₂) emission cap on Sulfuric Acid Plant (SAP) Nos. 10 and 11 of 750 lb SO₂/hr on 24-hour block averaging period (6:00 a.m. to 6:00 a.m.) at the Mosaic South Pierce Facility. This voluntary daily average emission cap is an enforceable limit that will assist towards the goal of the Regional Haze Rule during the second implementation period, the goal of the EPA's June 12, 2015, Startup, Shutdown, and Malfunction (SSM) SIP Call, and the continued assurance of the National Ambient Air Quality Standards (NAAQS) attainment. The permit also It also authorizes turnaround work on SAP No. 10. The South Pierce Facility is an existing phosphate fertilizer production facility categorized under Standard Industrial Classification No. 2874. The existing facility is in Polk County at 7450 Highway 630 in Mulberry, Florida. UTM Coordinates are: Zone 17, 407.53 East and 3071.51 North. Latitude is: 27°45'53.50" North; and Longitude is: 81°56'18.50" West.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Permit Revisions); and Section 3 (Emissions Unit Specific Conditions).

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Digitally signed by David Lyle Read
Date: 2022.09.22 13:15:47 -04'00'

David Lyle Read, P.E., Environmental Administrator
Permit Review Section
Division of Air Resource Management

FINAL PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit Revision, Technical Evaluation and Preliminary Determination, Final Determination, and Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Dexter Day, Mosaic: dexter.day@mosaicco.com

Ms. Dara Ford, Mosaic: dara.ford@mosaicco.com

Ms. Veronica Figueroa, P.E., Mosaic: veronica.figueroa@mosaicco.com

DEP Southwest District Office, Air Permitting: SWD_Air_Permitting@dep.state.fl.us

Ms. Amy Hilliard, DEP PRS: Amy.Hilliard@FloridaDEP.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



Digitally signed by Amy Hilliard
Date: 2022.09.22 14:22:19
-04'00'

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

The South Pierce Facility consists of two sulfuric acid plants (SAPs), a molten sulfur storage and handling system, a phosphogypsum stack, an auxiliary boiler, existing stationary reciprocating internal combustion engines (RICE) and stationary compression ignition (CI) internal combustion engines (ICE).

The existing facility consists of the following emissions units (EU).

EU No.	Description
004	Sulfuric Acid Plant #10
005	Sulfuric Acid Plant #11
030	Molten Sulfur Storage and Handling System
048	Phosphogypsum Stack
054	Emergency Diesel Engines (Existing Stationary RICE)
055	Stationary CI ICE
056	Auxiliary Boiler

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility operates units subject to the New Source Performance Standards (NSPS) of Title 40 Part 60 of the Code of Federal Regulations (40 CFR 60).
- The facility operates units subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

PROPOSED PROJECT

This permit is for the establishment of a SO₂ emission limit applicable to Sulfuric Acid Plant (SAP) Nos. 10 and 11. This emission limit is a voluntary SO₂ cap of 750 lb SO₂/hr on a 24-hour block average (6:00 am to 6:00 am) on SAP Nos. 10 and 11 that will assist towards the goal of the Regional Haze Rule during the second implementation period, the goal of the EPA's June 12, 2015 Startup, Shutdown, and Malfunction (SSM) SIP Call, and the continued assurance of the National Ambient Air Quality Standards (NAAQS) attainment. The permit also It also authorizes turnaround work on SAP No. 10.

This project will affect the following emissions units.

EU No.	Description
004	Sulfuric Acid Plant #10
005	Sulfuric Acid Plant #11

SECTION 1. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Permit Review Section in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Permit Review Section mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Southwest District Office at: 13051 Telecom Pkwy North, Temple Terrace, Florida 33637.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed, and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]
[Rule 62-212.400(12), F.A.C.]
8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050 and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. SAP Nos. 10 and 11 (EU 004 and 005)

This section of the permit addresses the following emissions units.

EU No.	Description
004	Sulfuric Acid Plant #10
005	Sulfuric Acid Plant #11

Each sulfuric acid plant has a design production rate of 3,000 tons per day of sulfuric acid (100% H₂SO₄ basis). These plants utilize the double absorption process and sulfuric acid mist emissions are controlled by high efficiency mist eliminators.

{Permitting Note: These emissions units are regulated under 40 CFR 60, Subpart A, NSPS General Provisions, and Subpart H, Standards of Performance for Sulfuric Acid Plants, both of which are adopted and incorporated by reference in Rule 62-204.800(8), F.A.C.; Rule 62-296.402, F.A.C., Sulfuric Acid Plants; Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less Than 250 MMBtu/Hour Heat Input, New and Existing Units; and Rule 62-212.400(BACT), F.A.C., under Permit No. 1050055-010-AC (PSD-FL-235). These plants are considered "new" under Rule 62-296.402, F.A.C.}

PREVIOUS APPLICABLE REQUIREMENTS

1. Effect on Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for these emissions units. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070(1) & (3), *Reasonable Assurance*, F.A.C.]

PERMITTED CAPACITIES

2. Permitted Capacities: The permitted capacities of the SAPs shall remain the same. [Application No. 1050057-037-AC; and Rule 62-4.070(1) & (3), *Reasonable Assurance*, F.A.C.]

AUTHORIZATION

3. Authorization: The permittee is authorized to perform the work listed below:
 - a. Replace the Drying Acid Tower at SAP 10;
 - b. Evaluate conditions of the SAP 10 converter catalysts and change and or augment catalysts as needed; and
 - c. General maintenance, repair, and replacement of ducts, pumps, vessels, and other ancillary equipment as determined by turnaround inspections may be performed as part of the SAP 10 Turnaround.

[Applicant Request; and, Rule 62-210.200, Definitions - Potential to Emit.]

SO₂ EMISSION LIMIT

4. SO₂ Emission Limit: Effective April 1, 2023, the following SO₂ emission cap applies to the SAP Nos. 10 and 11: 750 lb SO₂/hr on 24-hour block averaging period (6:00 a.m. to 6:00 a.m.). The 24-hour block average (6:00 a.m. to 6:00 a.m.) does not include hours when both SAPs are not operating.

[Rule 62-4.030, *General Prohibition*, F.A.C.; and, Rule 62-4.210, *Construction Permits*, F.A.C.]

COMPLIANCE REQUIREMENTS

5. Initial Compliance: These emission units shall use certified SO₂ CEMS data to demonstrate initial compliance with the SO₂ emission cap given in **Specific Condition 4** of this subsection. [Rules 62-4.070(1) & (3), *Reasonable Assurance*, F.A.C.; and Application No. 1050055-037-AC.]
6. Recordkeeping: The permittee shall keep records of the initial compliance demonstration. The records shall include the SO₂ CEMS data along with the sulfuric acid production rate (TPH, tons per hour) during the demonstration. Any reports shall be prepared in accordance with the applicable requirements specified in

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. SAP Nos. 10 and 11 (EU 004 and 005)

Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(10), F.A.C.; and Application No. 1050055-038-AC.]

7. Ongoing Compliance: The permittee shall use certified SO₂ CEMS data to demonstrate continuous compliance with the SO₂ emission cap given in **Specific Condition 4** of this subsection. [Rules 62-4.070(1) & (3), *Reasonable Assurance*, F.A.C.; and Application No. 1050055-037-AC.]



FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Interim Secretary

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

PERMITTEE

WestRock CP, LLC
North 8th Street
Fernandina Beach, Florida 32034

Authorized Representative:
Mr. Daniel C. Rowland, General Manager

Air Permit No. 0890003-072-AC
Permit Expires: December 31, 2024
Minor Air Construction Permit
Fernandina Beach Mill
No. 7 Power Boiler Regional Haze SO₂ Reduction Project

PROJECT

This is the final air construction permit that establishes coal usage caps for the No. 7 Power Boiler (EU 015) to reduce emissions of sulfur dioxide (SO₂) for the purpose of complying with the Environmental Protection Agency's (EPA) Regional Haze Program. The project also involves several notification requirements. The existing Fernandina Beach Mill is a paperboard mill and manufacturers corrugated and solid fiber boxes categorized under Standard Industrial Classification Nos. 2631 and 2653. The existing facility is in Nassau County at North 8th Street in Fernandina Beach, Florida. The UTM coordinates are Zone 17, 356.2 kilometers (km) East and 3394.1 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

Digitally signed by David Read
Date: 2021.06.24 11:26:30 -04'00'

David Lyle Read, P.E., Environmental Administrator
Office of Permitting and Compliance
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Daniel C. Rowland, General Manager, WestRock: Daniel.Rowland@westrock.com
Ms. Michele Rundlett, Environmental Manager, WestRock: Michele.Rundlett@westrock.com
Ms. Sheryl Watkins, P.E., All4: SWatkins@all4inc.com
Mr. Tom Kallemeyn, Program Administrator, NED: Tom.Kallemeyn@floridadep.gov
Mr. Stuart Bartlett, Environmental Consultant, NED: Stuart.Bartlett@floridadep.gov
Ms. Michelle Neeley, Program Manager, NED: Michelle.Neeley@floridadep.gov
Mr. Brian Durden, Program Manager, NED: Brian.Durden@floridadep.gov
Ms. Lynn Searce, DEP OPC: Lynn.Searce@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Lynn Searce

 Digitally signed by Lynn Searce
Date: 2021.06.24 11:52:00 -04'00'

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY DESCRIPTION

WestRock CP, LLC (WestRock) operates a fully integrated Kraft linerboard mill (the Mill). The Mill produces linerboard from wood pulp and pulp derived from recycled corrugated containers, which is then sold to customers for converting into corrugated containers. The manufacturing processes at the Mill consists of the following major plant operations: wood yard, pulp mill, recycle plant, chemical recovery, powerhouse, and paper mill. A container plant (box plant) also operates onsite, converting linerboard into corrugated containers. The major fuel burning sources at the mill consist of two power boilers, two recovery boilers, and one lime kiln. The existing facility consists of the following emissions units (EU).

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
006	No. 5 Power Boiler
007	No. 4 Recovery Boiler
011	No. 5 Recovery Boiler
013	No. 4 Smelt Dissolving Tank
014	No. 5 Smelt Dissolving Tank
015	No. 7 Power Boiler
020	Tall Oil Plant
021	No. 4 Lime Kiln
024	C-Line Brownstock Washer System
033	Pulping System MACT I
035	Wide-web Flexographic Printers
038	John Deere 210 Brake Horsepower (BHP) Diesel Engine- Model JU6H-UF50
039	Caterpillar 292 BHP Diesel Engine– Model 3406c
040	Caterpillar 292 BHP Diesel Engine – Model 3406c
041	Coal Handling System
042	John Deere, Diesel Engine (125 BHP) – Model 6466DF-00
043	Wisconsin, Gasoline Engine (65 BHP) – Model V465D
<i>Unregulated Emissions Units and Activities</i>	
025	Wood yard
026	Brownstock Washing
028	Chemical Recovery Area
031	Secondary Fiber Pulp
032	Papermaking
044	Temporary Rental Package Boiler - 99.5 million British thermal unit/hour (MMBtu/hour)

PROPOSED PROJECT

The purpose of this project is to establish coal usage caps for the No. 7 Power Boiler (EU 015) to reduce emissions of SO₂ for the purpose of complying with the EPA’s Regional Haze Program. The project also involves several notification requirements. The following EU will be affected by this project.

EU No.	Description
015	No. 7 Power Boiler

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility operates units subject to the New Source Performance Standards (NSPS) of Title 40 Part 60 of the Code of Federal Regulations (40 CFR 60).
- The facility operates units subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northeast District Office at: 8800 Baymeadows Way West, Suite 100, Jacksonville, FL 32256-7590.
3. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
4. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
5. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
6. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. No. 7 Power Boiler (EU 015)

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
015	No. 7 Power Boiler

Auxiliary boiler equipment includes an economizer, fans and drives, air preheater, instrumentation, breaching and duct work, and related piping. In addition, the Ash Handling System is identified under this emissions unit. Low-volume, high-concentration non-condensable gases (NCGs) from the batch digester system, continuous digester system, turpentine recovery system, evaporator systems, and foul condensate collection tank are collected and burned in the No. 4 Lime Kiln in accordance with 40 CFR 63, Subpart S. The No. 7 Power Boiler serves as the backup NCGs control device.

PM emissions are controlled by a two-chamber, 6-field each chamber, ESP manufactured by Hamon Research-Cottrell. PM emissions from the Ash Handling System are controlled by a fabric filter. The boiler is equipped with an oxygen trim system as defined in 40 CFR 63 Subpart DDDDD- 63.7575.

The total maximum operational heat input of this emissions unit is 1,021 MMBtu/hr. The emissions unit can generate 770,000 pounds of steam per hour on 100% coal at nominal temperature and nominal pressure. This emissions unit may fire coal, oil and/or natural gas.

{Permitting Note: The No. 7 Power Boiler is regulated under NSPS - 40 CFR 60, Subparts A – General Provisions and D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971, adopted and incorporated by reference in Rule 62-204.800(8)(b), F.A.C.; Rule 62-212.400(5), F.A.C., PSD: Permit No. PSD-FL-062; Rule 62-212.400(6), F.A.C., BACT Determination, dated October 11, 1980 and as amended; and 40 CFR 63, Subparts A – General Provisions and DDDDD, NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This emissions unit is classified as existing industrial boiler under 40 CFR 63, Subpart DDDDD. This emissions unit is classified as an existing unit in the subcategories “pulverized coal/solid fossil fuel units” and “units designed to burn solid fuel”, as defined in 40 CFR 63.7575. The Ash Handling System (EP02) is regulated under Rule 62-212.400(5), F.A.C., PSD: Permit No. PSD-FL-062.}

EXISTING PERMIT CONDITIONS

1. **Other Permits:** All other previously established permits and conditions remain in effect except where they conflict with the coal caps given below in **Specific Conditions 2 and 3**, then the coal caps govern. [Rule 62-4.070, F.A.C.]

NEW CONDITIONS RELATED TO EPA’S REGIONAL HAZE RULE

2. **Coal Usage Cap No. 1:** Effective on January 1, 2022, coal usage for the No. 7 Power Boiler shall not exceed 250 tons per day (TPD) based on a 30-day rolling average. The 250 TPD, 30-day rolling average coal cap excludes days on which a natural gas curtailment or supply interruption occurs as defined in [40 CFR 63, Subpart DDDDD](#) (§63.7575). [Regional Haze SIP; Application No. 0890003-072-AC and Rule 62-210.200(PTE), F.A.C.]
3. **Coal Usage Cap No. 2:** Effective on April 1, 2024, coal usage for the No. 7 Power Boiler shall not exceed 125 TPD based on a 30-day rolling average. The 125 TPD, 30-day rolling average coal cap excludes days on which a natural gas curtailment or supply interruption occurs. [Regional Haze SIP; Application No. 0890003-072-AC and Rule 62-210.200(PTE), F.A.C.]
4. **Notification of Gas Curtailment Events:** The permittee shall notify the Permitting Authority within 5 business days of the start and end of any gas curtailment or supply interruption event and keep records onsite for a period of 5 years documenting each gas curtailment event. [Regional Haze SIP; Application No. 0890003-072-AC and Rule 62-4.070(3), F.A.C.]