APPENDIX A

Florida Department of Environmental Protection Division of Air Resource Management

Regional Haze Supplemental SIP – Facility Permits and Documentation

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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

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: <u>Brian.Durden@floridadep.gov</u>

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.

Digitally signed by Amy Hilliard Date: 2021.12.16

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	
Regulated I	Regulated Emissions Units	
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	
Unregulate	d Emissions Units and Activities	
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
I	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. <u>Permitting Authority</u>: 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. <u>Compliance Authority</u>: 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. <u>Appendices</u>: 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. <u>Applicable Regulations, Forms and Application Procedures</u>: 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. <u>Modifications</u>: 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.]

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. <u>Record Retention</u>. 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

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

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

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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: <u>DEP NED@dep.state.fl.us</u>

Ms. Katie Miller, DEP Northeast District Office: Katie.Miller@floridadep.gov

Ms. Amy Hillard, DEP OPC: <u>Amy.Hillard@FloridaDEP.gov</u> Hastings Read, DEP OPC: <u>Hastings.Read@FloridaDEP.gov</u>

Clerk Stamp

Day Hillil

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

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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 SO_2 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	
Regulate	Regulated Emissions Units	
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. <u>Permitting Authority</u>: 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. <u>Compliance Authority</u>: 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. <u>Applicable Regulations, Forms and Application Procedures</u>: 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. <u>Modifications</u>: 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.]

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 SO_2 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.}

Appendix A-3



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

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

Dear Mr. Holbrooks,

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

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).

Digitally signed by David Read

Date: 2023.08.24 08:10:45 -04'00'

Executed in Tallahassee, Florida.

David Lyle Read, P.E., Environmental Administrator

David Lyk Real, P.E.

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: <u>DEP_NED@dep.state.fl.us</u>

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

JEA Air Permit No. 0310045-062-AC Northside Generating Station Permit Corrected: 0310045-057-AC

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 Day Hillil

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. <u>Double underlines</u> 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

D

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: <u>DEP_NED@dep.state.fl.us</u>
Ms. Amy Hilliard, DEP PRS: <u>Amy.Hilliard@FloridaDEP.gov</u>

Clerk Stamp

Day Hillid

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 15:01:43

-04'00

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. <u>Permitting Authority</u>: 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. <u>Compliance Authority</u>: 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. <u>Appendices</u>: 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. <u>Modifications</u>: 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.]

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: Bothe 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. <u>Effect on Other Permits</u>: 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. <u>Permitted Capacities</u>: 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. <u>SO₂ Emission Limit</u>: 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. <u>Initial Compliance</u>: 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

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

Jeanette Nuñez Lt. Governor

Noah Valenstein Secretary

PERMITTEE

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

Authorized Representative: Dexter Day, General Manager Appendix A-5

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

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.

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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

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

Day Hillil

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

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. <u>Permitting Authority</u>: 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. <u>Compliance Authority</u>: 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. <u>Appendices</u>: 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. <u>Applicable Regulations, Forms and Application Procedures</u>: 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. <u>Modifications</u>: 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. 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.]

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. <u>Effect on Other Permits</u>: 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. <u>Permitted Capacities</u>: 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. <u>Authorization</u>: 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. <u>Initial Compliance</u>: 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. <u>Recordkeeping</u>: 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

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

BOB MARTINEZ CENTER 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32399-2400 RICK SCOTT GOVERNOR

CARLOS LOPEZ-CANTERA LT. GOVERNOR

JONATHAN P. STEVERSON SECRETARY

PERMITTEE

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

Authorized Representative:

Mr. Thomas Sweetser, General Manager

Permit No. 0890003-046-AC Permit Expires: March 31, 2018 Fernandina Beach Mill

Project: SO₂ Emissions Reduction Project

Nassau County, Florida

PROJECT

This is the final air construction permit, which is for the Sulfur Dioxide (SO₂) Emissions Reduction Project at the Fernandina Beach Mill. Specific physical and operational changes at the mill will be undertaken to reduce SO₂ emissions and ambient impacts.

RockTenn CP, LLC operates an existing Kraft Pulp Mill (SIC No. 2611) in Fernandina Beach at 8th Street North in Nassau County, Florida 32304. The UTM coordinates are zone 17, 456.2 kilometers (km) East, and 3394.2 km North. This facility is a fully integrated Kraft linerboard mill that consists of major activities areas such as: wood yard, pulp mill, recycle plant, chemical recovery, power house and paper mill. A corrugated container plant is also located at the site.

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.). 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 requirements for major new source review in Chapter 62-212, F.A.C.

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 L. Read, P.E.

David J. Rol 2015.01.09

13:26:44 -05'00'

for: Jeffery F. Koerner, Program Administrator Office of Permitting and Compliance Division of Air Resource Management

JFK/dlr

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this final air permit package (including the Final Determination and Final Permit with 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. Thomas Sweetser, RockTenn: tsweetser@rocktenn.com

Ms. Michele Rundlett, RockTenn, mrundlett@rocktenn.com

Mr. Robert Fox, P.E., Environmental Resource Management: bob.fox@erm.com

Mr. Richard Rachal, DEP NED: Richard.Rachal@dep.state.fl.us

Ms. Heather Ceron, U.S. EPA Region 4: <u>ceron.heather@epa.gov</u>

Ms. Lorinda Shepherd, EPA Region 4: shephard.lorinda@epa.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.

2015.01.09 14:00:20 -05'00'

FACILITY DESCRIPTION

This existing facility is a Kraft Pulp Mill (SIC No. 2611) in Fernandina Beach at 8th Street North in Nassau County, Florida 32304. This facility is a fully integrated Kraft linerboard mill that consists of major activities areas such as: wood yard, pulp mill, recycle plant, chemical recovery, power house and paper mill. A corrugated container plant is also located at the site.

PROPOSED PROJECT

RockTenn CP, LLC will implement the physical and operational changes identified in the SO₂ Emissions Reduction Project to reduce SO₂ emissions and ambient impacts from the Mill. The SO₂ emissions standards specified in this permit are the basis for the SO₂ attainment demonstration in the State Implementation Plan (SIP). This existing facility consists of the emissions units (EU) shown in below. The emission units affected by this permitting action are highlighted in yellow.

EU No.	Brief Description	
Regulated Emissions Units		
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 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, Diesel Engine (65 BHP) – Model V465D	
Unregulat	ed Emissions Units and Activities	
025	Wood yard	
026	Brownstock Washing	
028	Chemical Recovery Area	
029	Converting Area/Warehouse	
030	Facility-Wide miscellaneous	
031	Secondary Fiber Pulp	
032	Papermaking	

SECTION 1. GENERAL INFORMATION

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 that are subject to the New Source Performance Standards (NSPS) at 40 Code of Federal Regulations, Part 60 (40 CFR 60), and the National Emissions Standards for Hazardous Air Pollutants (NESHAP) at 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

- 1. <u>Permitting Authority</u>: The permitting authority for this project is the Office of Permitting and Compliance, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The mailing address for the Office of Permitting and Compliance is 2600 Blairstone Road (MS #5505), Tallahassee, Florida 32399-2400.
- 2. <u>Compliance Authority</u>: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Compliance Authority, the Department's Northeast District Office. The Compliance Authority's mailing address is:

Northeast District Office 8800 Baymeadows Way West, Suite 100 Jacksonville, FL 32256-7590 Phone: (904) 256-1700 Fax: (904) 256-1588

- 3. <u>Appendices</u>: The following Appendices are attached as a part of this permit and the permittee must comply with the requirements of the appendices:
 - a. Appendix A. Citation Formats and Glossary of Common Terms
 - b. Appendix B. General Conditions
 - c. Appendix C. Common Testing Requirements
 - d. Appendix D. Standard CEMS Requirements
- 4. <u>Applicable Regulations, Forms and Application Procedures</u>: 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. <u>Modifications</u>: No emissions unit shall be constructed or 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. <u>Title V Permit</u>: This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit. 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. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

PREVIOUS APPLICABLE REQUIREMENTS

8. <u>Effect on Other Permits</u>: 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, rules and regulations. [Rule 62-4.070(1) & (3), Reasonable Assurance, F.A.C.]

A. No. 5 Power Boiler (EU No. 006)

This subsection of the permit addresses the following emission unit:

EU No.	Brief Description
006	No. 5 Power Boiler. This power boiler primarily fires carbonaceous fuel and oil with a total maximum operational heat input rate of 805 MMBtu/hour.
	Particulate matter emissions are controlled by a multiple cyclone (without fly ash reinjection) followed by a single-chamber, three-field, electrostatic precipitator. The fly ash collected in the electrostatic precipitator is injected into one of the No. 7 Power Boiler coal pulverizers. The boiler bottom ash is transported to the wastewater treatment plant or off-site landfill.
	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. 5 Power Boiler currently serves as a backup NCGs control device.

- 1. <u>Authorized Fuels</u>: Effective January 31, 2016, the No. 5 Power Boiler shall no longer fire No. 6 fuel oil. [Rules 62-4.070(3) and 62-4.080, F.A.C.; SO₂ Attainment SIP]
- 2. Operation as Backup NCGs Control Device for the No. 4 Lime Kiln: Effective December 1, 2017, the No. 5 Power Boiler is prohibited from use as a backup NCGs control device unless otherwise approved by the Division of Air Resource Management. As part of a request for approval, RockTenn shall submit an engineering analysis that provides reasonable assurance that the No. 5 Power Boiler can comply with the SO₂ emissions standard specified in **Specific Condition 3** of this subsection while combusting NCGs. The engineering analysis shall include pertinent operational and technical information including but not limited to: white liquor scrubber design details, design and actual total reduced sulfur (TRS) compounds removal efficiency of white liquor scrubber, expected and maximum TRS concentration in NCGs stream, restrictions on boiler fuels and firing rates when operating as a backup control device, etc. [Rules 62-4.070(3) and 62-4.080, F.A.C.; SO₂ Attainment SIP]
- 3. SO₂ Emissions Standard: Effective January 31, 2016 through November 30, 2017, SO₂ emissions from the No. 5 Power Boiler shall not exceed 15.0 lb/hour based on a 3-hour block average as determined by data collected from a continuous emissions monitoring system (CEMS), during all periods of operation except when operating as a backup control device firing NCGs. Effective December 1, 2017, SO₂ emissions from the No. 5 Power Boiler shall not exceed 15.0 lb/hour based on a 3-hour block average as determined by data collected from a CEMS during all periods of operation. The CEMS shall be measuring and recording in units of the SO₂ emissions standard by the first effective date for this new emissions standard. Compliance with this new emissions standard will ensure compliance with the SO₂ emissions standard established in Permit No. 0890003-018-AC, which resulted in an exemption from the requirements of Best Available Retrofit Technology (BART) pursuant to Rule 62-296.340, F.A.C.

{Permitting Note: This new emissions standard reduces SO_2 emissions and ambient impacts in and around the SO_2 non-attainment area in Nassau County.}

- **4.** Emissions Reporting: Within one business day of occurrence, the permittee shall notify the Compliance Authority of any exceedance of the SO₂ emissions standard. Within 15 days of occurrence, the permittee shall submit a report to the Compliance Authority detailing the exceedance, identifying the likely cause, describing any corrective actions taken, and noting when the unit was returned to compliance. [Rules 62-4.070(3) and 62-4.130, F.A.C.; SO₂ Attainment SIP]
- 5. Other Requirements: For additional recordkeeping, reporting, and notification requirements, see Appendix B (General Conditions), Appendix C (Common Testing Requirements) and Appendix D (Standard CEMS Requirements). [Rules 62-4.070(3) and 62-4.130, F.A.C.]

B. No. 7 Power Boiler (EU No. 015)

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

EU No.	Brief Description
015	No. 7 Power Boiler: Firing coal, oil, and/or natural gas, this power boiler is capable of generating 825,000 pounds per hour of steam with a nominal temperature of 825 degrees Fahrenheit (°F) and a nominal pressure of 850 pounds per square inch gage (psig). Auxiliary equipment includes an economizer, fans and drives, air preheater, instrumentation, breaching and duct work, and related piping.
	Particulate matter emissions are controlled by a two-chamber, 6-field per chamber, electrostatic precipitator manufactured by Hamon Research-Cottrell.
	Low-volume, high-concentration 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. Upon completion of this project, the No. 7 Power Boiler will serve as the backup NCGs control device.

- 1. SO₂ Emissions Standard: Effective January 31, 2016, SO₂ emissions from the No. 7 Power Boiler shall not exceed 1225.20 lb SO₂/hour based on a 3-hour block average as determined by the current compliance demonstration methods in the Title V air operation permit (e.g., stack testing, fuel sulfur monitoring and fuel consumption monitoring). The new emissions standard applies at all times including periods of startup and shutdown. Effective December 1, 2017, SO₂ emissions from the No. 7 Power Boiler shall not exceed 1225.20 lb SO₂/hour based on a 3-hour block average as determined by data collected from a certified CEMS. The new emissions standard applies at all times including periods of startup, shutdown, and the firing of NCGs. {Permitting Note: This new emissions standard reduces SO₂ emissions and ambient impacts in and around the SO₂ non-attainment area in Nassau County.}
 [Rules 62-4.070(3) and 62-4.080, F.A.C.; SO₂ Attainment SIP]
- 2. <u>Primary NCGs Backup Control Device</u>: Effective December 1, 2017, the No. 7 Power Boiler will be used as the primary backup NCGs control device for the No. 4 Lime Kiln to ensure compliance with 40 CFR 63, Subpart S National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry. The following associated work is authorized.
 - a. Piping System. The permittee shall install, operate and maintain a NCGs piping system to transport NCGs for combustion in the No. 7 Power Boiler comprised of piping and related equipment. Based on the preliminary design, the new piping system will tie into the existing NCGs line downstream of the existing steam ejector and just upstream of the existing entrainment separator at the No. Power Boiler and shall use similar equipment and safety interlocks as those currently in place at the No. 5 Power Boiler. All work on the NCGs piping system shall be complete by December 1, 2017. By December 30, 2017, the permittee shall submit the final design details of the new piping system (as installed) including a schematic of the interconnections of from existing NCG piping system to the scrubber and combustion units. [Rules 62-4.070(3) and 62-4.080, F.A.C.; SO₂ Attainment SIP]
 - **b.** White Liquor Scrubber System. Upstream of the introduction of NCGs to the No 7 Power Boiler, the permittee shall install, operate and maintain a white liquor scrubber system to remove TRS compounds from the NCGs stream before combustion in the No. 7 Power Boiler. The preliminary design of the white liquor scrubber includes a counter-flow, spray tower with the white liquor sprayed into the top of scrubber vessel using nozzles and the NCG stream entering the bottom of the vessel and flowing up across the packing material. The preliminary scrubber location is near the lime kiln, next to the existing NCGs condenser. The white liquor scrubber shall be designed to remove at least 50% of the TRS based on the design TRS concentration. The white liquor scrubber shall be designed as a closed system that does not exhaust to the atmosphere. All work on the white liquor scrubber system shall be complete by December 1, 2017. By December 30, 2017, the permittee shall submit the final design details of the new scrubber

B. No. 7 Power Boiler (EU No. 015)

system (as installed) including specific design details (e.g., scrubber liquor flow, spray nozzle arrangement, NCG exhaust flow, TRS concentration, pH levels, etc.). [Rules 62-4.070(3) and 62-4.080, F.A.C.; SO₂ Attainment SIP]

3. SO₂ CEMS Required for Demonstrating Compliance. The permittee shall install, calibrate, maintain and operate a CEMS to measure and record SO₂ emissions and exhaust flow for reporting in units of the applicable standard. Emissions shall be monitored and recorded during all periods of boiler operation including startup, shutdown and malfunction. The permittee shall install and operate the CEMS in accordance with the applicable performance specifications, quality assurance procedures, and quality control requirements summarized in Appendix D (Standard CEMS Requirements) of this permit. The CEMS shall be installed, certified and recording valid data in units of the SO₂ emissions standard prior to the No. 7 Power Boiler being connected to the NCG piping for use as a backup control device, but no later than December 1, 2017.

{Permitting Note: This specific condition replaces the SO_2 annual stack testing requirements for No. 7 Power Boiler specified in Construction Permit No. AC45-35532; PSD-FL-062; and Construction Permit No. 0890003-019-AC/PSD-FL-062B with and SO_2 CEMS to show compliance with the SO_2 emission limits.}

- **4.** Emissions Reporting: Within one business day of occurrence, the permittee shall notify the Compliance Authority of any exceedance of the SO₂ emissions standard. Within 15 days of occurrence, the permittee shall submit a report to the Compliance Authority detailing the exceedance, identifying the likely cause, describing any corrective actions taken, and noting when the unit was returned to compliance. [Rules 62-4.070(3) and 62-4.130, F.A.C.; SO₂ Attainment SIP]
- **5.** Other Requirements: For additional recordkeeping, reporting, and notification requirements, see Appendix B (General Conditions), Appendix C (Common Testing Requirements) and Appendix D (Standard CEMS Requirements). [Rules 62-4.070(3) and 62-4.130, F.A.C.]

C. Nos. 4 and 5 Recovery Boilers (EU Nos. 007 and 011)

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

EU No.	Brief Description
007	No. 4 Recovery Boiler: This recovery boiler is a Babcock &Wilcox low-odor design boiler with a total maximum operational rate of 137,500 lb/hour of black liquor solids. The boiler is capable of generating 492,000 lb/hour of high-pressure process steam. Particulate matter emissions are controlled by an electrostatic precipitator.
011	No. 5 Recovery Boiler: This recovery boiler is a low-odor design boiler with a total maximum operation rate of 156,780 lb/hour of black liquor solids. The boiler is capable of generating 495,700 lb/hour of high-pressure process steam.
	Particulate matter emissions are controlled from the North and South stacks by an electrostatic precipitator.
	The furnace recovers chemicals from Kraft spent liquor (straight mode) and neutral sulfite semi-chemical process liquor (cross mode).

- 1. Recovery Boiler Upgrades. The permittee shall make the necessary physical improvements to each recovery boiler necessary to achieve a more stable and consistent combustion and chemical recovery process within each unit. The preliminary plans include some or all of the following: adding liquor heaters to raise the asfired solids content, installing a heavy liquor tank to provide uniform operations, combustion air system improvements, combustion control system upgrades, concentrator pump and associated piping changes, and pump and piping upgrades necessary to fire No. 2 fuel oil. The preliminary design includes plans for a comprehensive, fully integrated air system based on combustion modeling and an upgraded two- or three-level combustion air system. Upgrades on at least one recovery boiler (Nos. 4 and/or 5) shall be complete no later than December 1, 2016. Upgrades on the remaining unit (No. 4 or No. 5) shall be complete no later than December 1, 2017. By December 30, 2016 and December 30, 2017, the permittee shall submit final design details for the newly upgraded recovery boiler to include a description of how the systems will be operated to the Compliance Authority and the Division of Air Resource Management. [Rules 62-4.070(3) and 62-4.080, F.A.C.; SO₂ Attainment SIP]
- 2. SO₂ Emission Standard. Effective January 1, 2018, SO₂ emissions from each recovery boiler shall not exceed 150.0 lb/hour based on a 3-hour block average as determined by data collected from a certified CEMS or other methods approved by the Division of Air Resource Management. Alternatively, the permittee may elect to comply with the following combined SO₂ emissions cap: Effective January 1, 2018, combined SO₂ emissions from the Nos. 4 and 5 recovery boilers shall not exceed 300.0 lb/hour based on a 3-hour block average as determined by data collected from a certified CEMS. Note that compliance with the combined SO₂ emissions cap must be demonstrated by certified CEMS data.

{Permitting Note: This new emissions standard reduces SO_2 emissions and ambient impacts in and around the SO_2 non-attainment area in Nassau County.}

- 3. SO₂ Compliance Demonstration.
 - a. SO_2 CEMS. Unless otherwise approved by the Division of Air Resource Management, compliance with the SO₂ emissions standard shall be demonstrated by data collected from a certified CEMS. The permittee shall install, calibrate, maintain and operate a CEMS on each recovery boiler to measure and record SO₂ emissions and exhaust flow for reporting in units of the applicable standard. Emissions shall be monitored and recorded during all periods of recovery boiler operation including startup, shutdown and malfunction. The permittee shall install and operate the CEMS in accordance with the applicable performance specifications, quality assurance procedures, and quality control requirements summarized in

C. Nos. 4 and 5 Recovery Boilers (EU Nos. 007 and 011)

- Appendix D (Standard CEMS Requirements) of this permit. If the permittee elects the combined SO₂ emissions cap, compliance must be demonstrated with CEMS data. The CEMS shall be measuring and recording valid data in units of the SO₂ emissions standard by January 1, 2018.
- b. Periodic Emissions Testing Plus Parametric Monitoring: The permittee may elect to complete the physical improvements to the combustion air systems early. This would allow time to conduct engineering tests to gather critical SO₂ emissions data, fuel firing data, and other operational data to establish the SO₂ emissions profile for each unit to identify key parameters that ensure a stable combustion and recovery process. If able to identify a strong relationship between SO₂ emissions and key operating parameters, the permittee may request approval of a combination of periodic compliance testing (e.g., quarterly stack tests that collect 24-hours of continuous data) plus continuous parametric monitoring as an alternative to the installation and operation of a certified CEMS.

- **4.** Emissions Reporting: Within one business day of occurrence, the permittee shall notify the Compliance Authority of any exceedance of the SO₂ emissions standard. Within 15 days of occurrence, the permittee shall submit a report to the Compliance Authority detailing the exceedance, identifying the likely cause, describing any corrective actions taken, and noting when the unit was returned to compliance. [Rules 62-4.070(3) and 62-4.130, F.A.C.; SO₂ Attainment SIP]
- 5. Other Requirements: For additional recordkeeping, reporting, and notification requirements, see Appendix B (General Conditions), Appendix C (Common Testing Requirements) and Appendix D (Standard CEMS Requirements). [Rules 62-4.070(3) and 62-4.130, F.A.C.]