

APPENDIX G-1

Florida Department of Environmental Protection Division of Air Resource Management

Regional Haze SIP – Reasonable Progress Analysis Requests to Facilities

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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

Noah Valenstein
Secretary

Via Electronic Mail

To: Duke Energy Crystal River Power Plant
From: Division of Air Resource Management
Date: June 22, 2020
Subject: Regional Haze Rule - Reasonable Progress Analysis

The Florida Department of Environmental Protection (Department) requests that Duke Energy Crystal River Power Plant (Crystal River) complete and submit to the Department an analysis for selected emission units at your facility regarding the availability of emission controls needed to ensure reasonable progress to visibility goals at Class I areas in and around the State of Florida. For each selected unit, you must provide either a reasonable progress four-factor technical analysis or an analysis demonstrating that the unit meets the “effectively controlled unit” exemption at the facility following the instructions below.

1. Background

The U.S. Environmental Protection Agency (EPA) Regional Haze Rule requires states to submit a series of State Implementation Plans (SIPs) to protect visibility in national parks and wilderness areas known as mandatory Federal Class I areas. Regional Haze SIPs for the second implementation period (2018 – 2028) are due July 31, 2021. EPA has distributed final guidance¹ on the second implementation period that the Department is following throughout the SIP development process. The following Class I areas in or near Florida are subject to the Regional Haze Rule:

- Chassahowitzka National Wildlife Refuge
- Everglades National Park
- St. Marks National Wildlife Refuge
- Okefenokee National Wildlife Refuge (Georgia)
- Wolf Island National Wildlife Refuge (Georgia)

Pursuant to 40 CFR 51.308(f)(2)(i), as part of the SIP development process, states must evaluate and determine whether any cost-effective emission reduction measures and strategies are available to ensure reasonable progress toward natural visibility conditions in each Class I area in

¹ Guidance on Regional Haze State Implementation Plans for the Second Implementation Period (Regional Haze Guidance). Peter Tsirigotis Memorandum dated August 20, 2019, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711, available at: https://www.epa.gov/sites/production/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf

the current implementation period. A reasonable progress four-factor analysis considers emission reduction measures against four factors (the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and remaining useful life) to determine if any cost-effective measures are available for ensuring reasonable progress toward natural visibility conditions.

Point sources emitting SO₂, which contribute to the formation of visibility-impairing sulfates, typically have the most significant impact on anthropogenic visibility impairment in Class I areas. To determine which sources should undergo a reasonable progress four factor analysis, the Department first screened sources using an Area of Influence (AOI) analysis. The AOI analysis evaluates a source's 2028 projected actual emissions, distance to Class I area, and wind trajectories to estimate the source's relative contribution to visibility impairment at each Class I area. The Department further analyzed sources with at least 5 percent relative contribution through source apportionment modeling.

Source apportionment modeling tracks a source's SO₂ emissions and directly calculates how much sulfate visibility impairment in a Class I area is attributable to that source. Florida identified a threshold of 1 percent contribution to visibility impairment from sulfates relative to the total visibility impairment from point source sulfate as an appropriate threshold that would select only those sources that are projected to have a significant impact on visibility impairment in Class I areas in 2028.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule and is asking for your cooperation to meet those requirements. With a contribution of 6.24 percent to sulfates at Chassahowitzka National Wildlife Refuge based on projected 2028 SO₂ emissions of 2,614 tons per year, the Department identified Crystal River as a source that must undergo a reasonable progress analysis for SO₂ emissions.

The units listed below are projected to emit more than 5 tons per year of SO₂ in 2028. Units emitting less than this are not expected to have a significant impact on visibility impairment. For each unit listed below, the Department requests that Crystal River complete and submit either a reasonable progress four-factor technical analysis, following the instructions in **Section 2** below, or an analysis demonstrating that a four-factor analysis is not required for that unit if it meets one of the exemptions discussed below this list:

- EU003 – Fossil Fuel Steam Generating Unit 5
- EU004 – Fossil Fuel Steam Generating Unit 4
- EU0042 – Citrus County Combined Cycle Station Unit 2A
- EU0043 – Citrus County Combined Cycle Station Unit 2B
- EU0051 – Citrus County Combined Cycle Station Unit 1A
- EU0052 – Citrus County Combined Cycle Station Unit 1B

A four-factor analysis is not required for units that are effectively-controlled under an enforceable requirement² or that will be shutting down by December 31, 2028 under an

² See pages 22-25 of Regional Haze Guidance.

enforceable requirement³, per EPA's Regional Haze Guidance. If the owner or operator determines that a unit meets one of these exemptions, the Department requests that the owner or operator submit an analysis justifying this determination by August 21, 2020. For all other units, the Department requests that a four-factor technical analysis be submitted for each unit, following the instructions in **Section 2** below, by October 23, 2020.

2. Instructions on Completing a Reasonable Progress Four-Factor Analysis

A separate four-factor analysis should be completed for each unit listed above that is not exempt from four-factor analysis. The four-factor analysis must include an evaluation of technically feasible SO₂ emission control measures and a proposed determination of whether it is reasonable to require any control measure(s) for each unit. The owner or operator must characterize the four factors listed in Clean Air Act Section 169A(g)(1) for each technically feasible emission control measure:

- Cost of compliance;
- Time necessary for compliance;
- Energy and non-air quality environmental impacts of compliance; and
- Remaining useful life.

The owner or operator should also provide the control effectiveness and expected emission reductions that would be achieved by implementation of the measure for each technically feasible emission control measure. If a control measure is not technically feasible, the owner or operator should provide justification for this determination. EPA's Regional Haze Guidance provides information on how to determine which emission control measures to consider⁴ and how to characterize each of the four factors.⁵ The facility should consult this guidance in developing the four-factor analysis.

The Department will work with the facility to issue an air construction permit for any emission control measure(s) determined to be reasonable for each emissions unit addressed in the analysis. The permit will require the owner or operator of the affected emissions units to comply with the control measures as expeditiously as practicable, but not later than December 31, 2028. The permit will require an operation and maintenance plan for any control equipment required by the Department's determination. These permits will be submitted as part of Florida's Regional Haze SIP, making them permanent and federally enforceable.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule. Thus, for the units listed above, if by October 23, 2020 the owner or operator has not submitted an adequate four-factor analysis, and the owner or operator does not submit an adequate analysis justifying exemption from four-factor analysis by August 21, 2020, the Department will identify whether there are any cost-effective control measures available for each unit and issue an administrative order that establishes control measures based on the four factors, taking into consideration all information available. The Department will state the basis for its

³ See page 20 of Regional Haze Guidance.

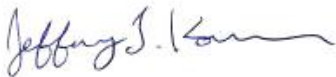
⁴ See pages 28-30 of Regional Haze Guidance.

⁵ See pages 31-33 of Regional Haze Guidance.

determination(s) in a technical evaluation document supporting the issuance of any administrative order.

Thank you for your cooperation with this request. If you have any questions about the reasonable progress four-factor analysis, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Koerner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeff Koerner, Director
Division of Air Resource Management



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

Via Electronic Mail

To: Foley Cellulose Foley Mill
From: Division of Air Resource Management
Date: June 22, 2020
Subject: Regional Haze Rule - Reasonable Progress Analysis

The Florida Department of Environmental Protection (Department) requests that Foley Cellulose Foley Mill complete and submit to the Department an analysis for selected emission units at your facility regarding the availability of emission controls needed to ensure reasonable progress to visibility goals at Class I areas in and around the State of Florida. For each selected unit, you must provide either a reasonable progress four-factor technical analysis or an analysis demonstrating that the unit meets the “effectively controlled unit” exemption at the facility following the instructions below.

1. Background

The U.S. Environmental Protection Agency (EPA) Regional Haze Rule requires states to submit a series of State Implementation Plans (SIPs) to protect visibility in national parks and wilderness areas known as mandatory Federal Class I areas. Regional Haze SIPs for the second implementation period (2018 – 2028) are due July 31, 2021. EPA has distributed final guidance¹ on the second implementation period that the Department is following throughout the SIP development process. The following Class I areas in or near Florida are subject to the Regional Haze Rule:

- Chassahowitzka National Wildlife Refuge
- Everglades National Park
- St. Marks National Wildlife Refuge
- Okefenokee National Wildlife Refuge (Georgia)
- Wolf Island National Wildlife Refuge (Georgia)

Pursuant to 40 CFR 51.308(f)(2)(i), as part of the SIP development process, states must evaluate and determine whether any cost-effective emission reduction measures and strategies are available to ensure reasonable progress toward natural visibility conditions in each Class I area in

¹ Guidance on Regional Haze State Implementation Plans for the Second Implementation Period (Regional Haze Guidance). Peter Tsirigotis Memorandum dated August 20, 2019, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711, available at: https://www.epa.gov/sites/production/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf

the current implementation period. A reasonable progress four-factor analysis considers emission reduction measures against four factors (the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and remaining useful life) to determine if any cost-effective measures are available for ensuring reasonable progress toward natural visibility conditions.

Point sources emitting SO₂, which contribute to the formation of visibility-impairing sulfates, typically have the most significant impact on anthropogenic visibility impairment in Class I areas. To determine which sources should undergo a reasonable progress four factor analysis, the Department first screened sources using an Area of Influence (AOI) analysis. The AOI analysis evaluates a source's 2028 projected actual emissions, distance to Class I area, and wind trajectories to estimate the source's relative contribution to visibility impairment at each Class I area. The Department further analyzed sources with at least 5 percent relative contribution through source apportionment modeling.

Source apportionment modeling tracks a source's SO₂ emissions and directly calculates how much sulfate visibility impairment in a Class I area is attributable to that source. Florida identified a threshold of 1 percent contribution to visibility impairment from sulfates relative to the total visibility impairment from point source sulfate as an appropriate threshold that would select only those sources that are projected to have a significant impact on visibility impairment in Class I areas in 2028.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule and is asking for your cooperation to meet those requirements. With a contribution of 2.16 percent to sulfates at Okefenokee National Wildlife Refuge based on projected 2028 SO₂ emissions of 1,520 tons per year, the Department identified Foley Mill as a source that must undergo a reasonable progress analysis for SO₂ emissions.

The units listed below are projected to emit more than 5 tons per year of SO₂ in 2028. Units emitting less than this are not expected to have a significant impact on visibility impairment. For each unit listed below, the Department requests that Foley Mill complete and submit either a reasonable progress four-factor technical analysis, following the instructions in **Section 2** below, or an analysis demonstrating that a four-factor analysis is not required for that unit if it meets one of the exemptions discussed below this list:

- EU002 – No. 1 Power Boiler
- EU004 – No. 1. Bark Boiler
- EU006 – No. 2 Recovery Boiler
- EU007 – No. 3 Recovery Boiler
- EU011 – No. 4 Recovery Boiler
- EU019 – No. 2 Bark Boiler

A four-factor analysis is not required for units that are effectively-controlled under an enforceable requirement² or that will be shutting down by December 31, 2028 under an

² See pages 22-25 of Regional Haze Guidance.

enforceable requirement³, per EPA's Regional Haze Guidance. If the owner or operator determines that a unit meets one of these exemptions, the Department requests that the owner or operator submit an analysis justifying this determination by August 21, 2020. For all other units, the Department requests that a four-factor technical analysis be submitted for each unit, following the instructions in **Section 2** below, by October 23, 2020.

2. Instructions on Completing a Reasonable Progress Four-Factor Analysis

A separate four-factor analysis should be completed for each unit listed above that is not exempt from four-factor analysis. The four-factor analysis must include an evaluation of technically feasible SO₂ emission control measures and a proposed determination of whether it is reasonable to require any control measure(s) for each unit. The owner or operator must characterize the four factors listed in Clean Air Act Section 169A(g)(1) for each technically feasible emission control measure:

- Cost of compliance;
- Time necessary for compliance;
- Energy and non-air quality environmental impacts of compliance; and
- Remaining useful life.

The owner or operator should also provide the control effectiveness and expected emission reductions that would be achieved by implementation of the measure for each technically feasible emission control measure. If a control measure is not technically feasible, the owner or operator should provide justification for this determination. EPA's Regional Haze Guidance provides information on how to determine which emission control measures to consider⁴ and how to characterize each of the four factors.⁵ The facility should consult this guidance in developing the four-factor analysis.

The Department will work with the facility to issue an air construction permit for any emission control measure(s) determined to be reasonable for each emissions unit addressed in the analysis. The permit will require the owner or operator of the affected emissions units to comply with the control measures as expeditiously as practicable, but not later than December 31, 2028. The permit will require an operation and maintenance plan for any control equipment required by the Department's determination. These permits will be submitted as part of Florida's Regional Haze SIP, making them permanent and federally enforceable.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule. Thus, for the units listed above, if by October 23, 2020 the owner or operator has not submitted an adequate four-factor analysis, and the owner or operator does not submit an adequate analysis justifying exemption from four-factor analysis by August 21, 2020, the Department will identify whether there are any cost-effective control measures available for each unit and issue an administrative order that establishes control measures based on the four factors, taking into consideration all information available. The Department will state the basis for its

³ See page 20 of Regional Haze Guidance.

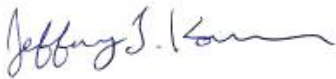
⁴ See pages 28-30 of Regional Haze Guidance.

⁵ See pages 31-33 of Regional Haze Guidance.

determination(s) in a technical evaluation document supporting the issuance of any administrative order.

Thank you for your cooperation with this request. If you have any questions about the reasonable progress four-factor analysis, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Koerner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeff Koerner, Director
Division of Air Resource Management



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Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

Via Electronic Mail

To: Jacksonville Electric Authority Northside Generating Station
From: Division of Air Resource Management
Date: June 22, 2020
Subject: Regional Haze Rule - Reasonable Progress Analysis

The Florida Department of Environmental Protection (Department) requests that Jacksonville Electric Authority Northside Generating Station (Northside) complete and submit to the Department an analysis for selected emission units at your facility regarding the availability of emission controls needed to ensure reasonable progress to visibility goals at Class I areas in and around the State of Florida. For each selected unit, you must provide either a reasonable progress four-factor technical analysis or an analysis demonstrating that the unit meets the “effectively controlled unit” exemption at the facility following the instructions below.

1. Background

The U.S. Environmental Protection Agency (EPA) Regional Haze Rule requires states to submit a series of State Implementation Plans (SIPs) to protect visibility in national parks and wilderness areas known as mandatory Federal Class I areas. Regional Haze SIPs for the second implementation period (2018 – 2028) are due July 31, 2021. EPA has distributed final guidance¹ on the second implementation period that the Department is following throughout the SIP development process. The following Class I areas in or near Florida are subject to the Regional Haze Rule:

- Chassahowitzka National Wildlife Refuge
- Everglades National Park
- St. Marks National Wildlife Refuge
- Okefenokee National Wildlife Refuge (Georgia)
- Wolf Island National Wildlife Refuge (Georgia)

Pursuant to 40 CFR 51.308(f)(2)(i), as part of the SIP development process, states must evaluate and determine whether any cost-effective emission reduction measures and strategies are available to ensure reasonable progress toward natural visibility conditions in each Class I area in

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the current implementation period. A reasonable progress four-factor analysis considers emission reduction measures against four factors (the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and remaining useful life) to determine if any cost-effective measures are available for ensuring reasonable progress toward natural visibility conditions.

Point sources emitting SO₂, which contribute to the formation of visibility-impairing sulfates, typically have the most significant impact on anthropogenic visibility impairment in Class I areas. To determine which sources should undergo a reasonable progress four factor analysis, the Department first screened sources using an Area of Influence (AOI) analysis. The AOI analysis evaluates a source's 2028 projected actual emissions, distance to Class I area, and wind trajectories to estimate the source's relative contribution to visibility impairment at each Class I area. The Department further analyzed sources with at least 5 percent relative contribution through source apportionment modeling.

Source apportionment modeling tracks a source's SO₂ emissions and directly calculates how much sulfate visibility impairment in a Class I area is attributable to that source. Florida identified a threshold of 1 percent contribution to visibility impairment from sulfates relative to the total visibility impairment from point source sulfate as an appropriate threshold that would select only those sources that are projected to have a significant impact on visibility impairment in Class I areas in 2028.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule and is asking for your cooperation to meet those requirements. With a contribution of 1.29 percent to sulfates at Wolf Island National Wildlife Refuge based on projected 2028 SO₂ emissions of 2,317.9 tons per year, the Department identified Northside as a source that must undergo a reasonable progress analysis for SO₂ emissions.

The units listed below are projected to emit more than 5 tons per year of SO₂ in 2028. Units emitting less than this are not expected to have a significant impact on visibility impairment. For each unit listed below, the Department requests that Northside complete and submit either a reasonable progress four-factor technical analysis, following the instructions in **Section 2** below, or an analysis demonstrating that a four-factor analysis is not required for that unit if it meets one of the exemptions discussed below this list:

- EU003 – Boiler No. 3
- EU026 – Circulating Fluidized Bed Boiler No. 2
- EU027 – Circulating Fluidized Bed Boiler No. 1

A four-factor analysis is not required for units that are effectively-controlled under an enforceable requirement² or that will be shutting down by December 31, 2028 under an enforceable requirement³, per EPA's Regional Haze Guidance. If the owner or operator determines that a unit meets one of these exemptions, the Department requests that the owner or operator submit an analysis justifying this determination by August 21, 2020. For all other units,

² See pages 22-25 of Regional Haze Guidance.

³ See page 20 of Regional Haze Guidance.

the Department requests that a four-factor technical analysis be submitted for each unit, following the instructions in **Section 2** below, by October 23, 2020.

2. Instructions on Completing a Reasonable Progress Four-Factor Analysis

A separate four-factor analysis should be completed for each unit listed above that is not exempt from four-factor analysis. The four-factor analysis must include an evaluation of technically feasible SO₂ emission control measures and a proposed determination of whether it is reasonable to require any control measure(s) for each unit. The owner or operator must characterize the four factors listed in Clean Air Act Section 169A(g)(1) for each technically feasible emission control measure:

- Cost of compliance;
- Time necessary for compliance;
- Energy and non-air quality environmental impacts of compliance; and
- Remaining useful life.

The owner or operator should also provide the control effectiveness and expected emission reductions that would be achieved by implementation of the measure for each technically feasible emission control measure. If a control measure is not technically feasible, the owner or operator should provide justification for this determination. EPA's Regional Haze Guidance provides information on how to determine which emission control measures to consider⁴ and how to characterize each of the four factors.⁵ The facility should consult this guidance in developing the four-factor analysis.

The Department will work with the facility to issue an air construction permit for any emission control measure(s) determined to be reasonable for each emissions unit addressed in the analysis. The permit will require the owner or operator of the affected emissions units to comply with the control measures as expeditiously as practicable, but not later than December 31, 2028. The permit will require an operation and maintenance plan for any control equipment required by the Department's determination. These permits will be submitted as part of Florida's Regional Haze SIP, making them permanent and federally enforceable.

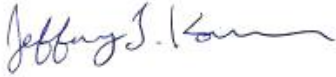
The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule. Thus, for the units listed above, if by October 23, 2020 the owner or operator has not submitted an adequate four-factor analysis, and the owner or operator does not submit an adequate analysis justifying exemption from four-factor analysis by August 21, 2020, the Department will identify whether there are any cost-effective control measures available for each unit and issue an administrative order that establishes control measures based on the four factors, taking into consideration all information available. The Department will state the basis for its determination(s) in a technical evaluation document supporting the issuance of any administrative order.

⁴ See pages 28-30 of Regional Haze Guidance.

⁵ See pages 31-33 of Regional Haze Guidance.

Thank you for your cooperation with this request. If you have any questions about the reasonable progress four-factor analysis, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,

A handwritten signature in blue ink that reads "Jeff Koerner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeff Koerner, Director
Division of Air Resource Management



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

Via Electronic Mail

To: Lakeland Electric – C. D. McIntosh Power Plant
From: Division of Air Resource Management
Date: August 18, 2020
Subject: Regional Haze Rule - Reasonable Progress Analysis

The Florida Department of Environmental Protection (Department) requests that Lakeland Electric C. D. McIntosh Power Plant (McIntosh) complete and submit to the Department an analysis for selected emission units at your facility regarding the availability of emission controls needed to ensure reasonable progress to visibility goals at Class I areas in and around the State of Florida. For each selected unit, you must provide either a reasonable progress four-factor technical analysis or an analysis demonstrating that the unit meets the “effectively controlled unit” exemption at the facility following the instructions below.

1. Background

The U.S. Environmental Protection Agency (EPA) Regional Haze Rule requires states to submit a series of State Implementation Plans (SIPs) to protect visibility in national parks and wilderness areas known as mandatory Federal Class I areas. Regional Haze SIPs for the second implementation period (2018 – 2028) are due July 31, 2021. EPA has distributed final guidance¹ on the second implementation period that the Department is following throughout the SIP development process. The following Class I areas in or near Florida are subject to the Regional Haze Rule:

- Chassahowitzka National Wildlife Refuge
- Everglades National Park
- St. Marks National Wildlife Refuge
- Okefenokee National Wildlife Refuge (Georgia)
- Wolf Island National Wildlife Refuge (Georgia)

Pursuant to 40 CFR 51.308(f)(2)(i), as part of the SIP development process, states must evaluate and determine whether any cost-effective emission reduction measures and strategies are available to ensure reasonable progress toward natural visibility conditions in each Class I area in

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the current implementation period. A reasonable progress four-factor analysis considers emission reduction measures against four factors (the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and remaining useful life) to determine if any cost-effective measures are available for ensuring reasonable progress toward natural visibility conditions.

Point sources emitting SO₂, which contribute to the formation of visibility-impairing sulfates, typically have the most significant impact on anthropogenic visibility impairment in Class I areas. To determine which sources should undergo a reasonable progress four factor analysis, the Department screened sources using an Area of Influence (AOI) analysis. The AOI analysis evaluates a source's 2028 projected actual emissions, distance to Class I area, and wind trajectories to estimate the source's contributions to visibility impairment at each Class I area.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule and is asking for your cooperation to meet those requirements. With a contribution of 4.64 percent to sulfates at Everglades National Park based on projected 2028 SO₂ emissions of 4,202.2 tons per year, the Department identified McIntosh as a source that must undergo a reasonable progress analysis for SO₂ emissions.

The unit listed below is projected to emit more than 5 tons per year of SO₂ in 2028. Units emitting less than this are not expected to have a significant impact on visibility impairment. For the unit listed below, the Department requests that McIntosh complete and submit either a reasonable progress four-factor technical analysis, following the instructions in **Section 2** below, or an analysis demonstrating that a four-factor analysis is not required for the unit if it meets one of the exemptions discussed below this list:

- EU006 – McIntosh Unit 3, Fossil-Fuel-Fired Steam Generator

A four-factor analysis is not required for units that are effectively-controlled under an enforceable requirement² or that will be shutting down by December 31, 2028 under an enforceable requirement³, per EPA's Regional Haze Guidance. If the owner or operator determines that the unit meets one of these exemptions, the Department requests that the owner or operator submit an analysis justifying this determination by October 23, 2020. Otherwise, the Department requests that a four-factor technical analysis be submitted for the unit, following the instructions in **Section 2** below, by November 23, 2020.

2. Instructions on Completing a Reasonable Progress Four-Factor Analysis

A separate four-factor analysis should be completed for the unit listed above if it is not exempt from four-factor analysis. The four-factor analysis must include an evaluation of technically feasible SO₂ emission control measures and a proposed determination of whether it is reasonable to require any control measure(s) for the unit. The owner or operator must characterize the four factors listed in Clean Air Act Section 169A(g)(1) for each technically feasible emission control measure:

² See pages 22-25 of Regional Haze Guidance.

³ See page 20 of Regional Haze Guidance.

- Cost of compliance;
- Time necessary for compliance;
- Energy and non-air quality environmental impacts of compliance; and
- Remaining useful life.

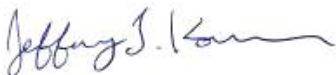
The owner or operator should also provide the control effectiveness and expected emission reductions that would be achieved by implementation of the measure for each technically feasible emission control measure. If a control measure is not technically feasible, the owner or operator should provide justification for this determination. EPA's Regional Haze Guidance provides information on how to determine which emission control measures to consider⁴ and how to characterize each of the four factors.⁵ The facility should consult this guidance in developing the four-factor analysis.

The Department will work with the facility to issue an air construction permit for any emission control measure(s) determined to be reasonable for the emissions unit addressed in the analysis. The permit will require the owner or operator of the affected emissions unit to comply with the control measures as expeditiously as practicable, but not later than December 31, 2028. The permit will require an operation and maintenance plan for any control equipment required by the Department's determination. These permits will be submitted as part of Florida's Regional Haze SIP, making them permanent and federally enforceable.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule. Thus, for the unit listed above, if by November 23, 2020 the owner or operator has not submitted an adequate four-factor analysis, and the owner or operator does not submit an adequate analysis justifying exemption from four-factor analysis by October 23, 2020, the Department will identify whether there are any cost-effective control measures available for the unit and issue an administrative order that establishes control measures based on the four factors, taking into consideration all information available. The Department will state the basis for its determination(s) in a technical evaluation document supporting the issuance of any administrative order.

Thank you for your cooperation with this request. If you have any questions about the reasonable progress four-factor analysis, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,



Jeff Koerner, Director
Division of Air Resource Management

⁴ See pages 28-30 of Regional Haze Guidance.

⁵ See pages 31-33 of Regional Haze Guidance.



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

Via Electronic Mail

To: Mosaic Fertilizer, LLC Bartow Facility
From: Division of Air Resource Management
Date: June 22, 2020
Subject: Regional Haze Rule - Reasonable Progress Analysis

The Florida Department of Environmental Protection (Department) requests that Mosaic Fertilizer, LLC Bartow Facility (Bartow) complete and submit to the Department an analysis for selected emission units at your facility regarding the availability of emission controls needed to ensure reasonable progress to visibility goals at Class I areas in and around the State of Florida. For each selected unit, you must provide either a reasonable progress four-factor technical analysis or an analysis demonstrating that the unit meets the “effectively controlled unit” exemption at the facility following the instructions below.

1. Background

The U.S. Environmental Protection Agency (EPA) Regional Haze Rule requires states to submit a series of State Implementation Plans (SIPs) to protect visibility in national parks and wilderness areas known as mandatory Federal Class I areas. Regional Haze SIPs for the second implementation period (2018 – 2028) are due July 31, 2021. EPA has distributed final guidance¹ on the second implementation period that the Department is following throughout the SIP development process. The following Class I areas in or near Florida are subject to the Regional Haze Rule:

- Chassahowitzka National Wildlife Refuge
- Everglades National Park
- St. Marks National Wildlife Refuge
- Okefenokee National Wildlife Refuge (Georgia)
- Wolf Island National Wildlife Refuge (Georgia)

Pursuant to 40 CFR 51.308(f)(2)(i), as part of the SIP development process, states must evaluate and determine whether any cost-effective emission reduction measures and strategies are available to ensure reasonable progress toward natural visibility conditions in each Class I area in

¹ Guidance on Regional Haze State Implementation Plans for the Second Implementation Period (Regional Haze Guidance). Peter Tsirigotis Memorandum dated August 20, 2019, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711, available at: https://www.epa.gov/sites/production/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf

the current implementation period. A reasonable progress four-factor analysis considers emission reduction measures against four factors (the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and remaining useful life) to determine if any cost-effective measures are available for ensuring reasonable progress toward natural visibility conditions.

Point sources emitting SO₂, which contribute to the formation of visibility-impairing sulfates, typically have the most significant impact on anthropogenic visibility impairment in Class I areas. To determine which sources should undergo a reasonable progress four factor analysis, the Department first screened sources using an Area of Influence (AOI) analysis. The AOI analysis evaluates a source's 2028 projected actual emissions, distance to Class I area, and wind trajectories to estimate the source's relative contribution to visibility impairment at each Class I area. The Department further analyzed sources with at least 5 percent relative contribution through source apportionment modeling.

Source apportionment modeling tracks a source's SO₂ emissions and directly calculates how much sulfate visibility impairment in a Class I area is attributable to that source. Florida identified a threshold of 1 percent contribution to visibility impairment from sulfates relative to the total visibility impairment from point source sulfate as an appropriate threshold that would select only those sources that are projected to have a significant impact on visibility impairment in Class I areas in 2028.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule and is asking for your cooperation to meet those requirements. With a contribution of 2.62 percent to sulfates at Everglades National Park based on projected 2028 SO₂ emissions of 4,301 tons per year, the Department identified Bartow as a source that must undergo a reasonable progress analysis for SO₂ emissions.

The units listed below are projected to emit more than 5 tons per year of SO₂ in 2028. Units emitting less than this are not expected to have a significant impact on visibility impairment. For each unit listed below, the Department requests that Bartow complete and submit either a reasonable progress four-factor technical analysis, following the instructions in **Section 2** below, or an analysis demonstrating that a four-factor analysis is not required for that unit if it meets one of the exemptions discussed below this list:

- EU012 – No. 4 Sulfuric Acid Plant
- EU032 – No. 6 Sulfuric Acid Plant
- EU033 – No. 5 Sulfuric Acid Plant

A four-factor analysis is not required for units that are effectively-controlled under an enforceable requirement² or that will be shutting down by December 31, 2028 under an enforceable requirement³, per EPA's Regional Haze Guidance. If the owner or operator determines that a unit meets one of these exemptions, the Department requests that the owner or operator submit an analysis justifying this determination by August 21, 2020. For all other units,

² See pages 22-25 of Regional Haze Guidance.

³ See page 20 of Regional Haze Guidance.

the Department requests that a four-factor technical analysis be submitted for each unit, following the instructions in **Section 2** below, by October 23, 2020.

2. Instructions on Completing a Reasonable Progress Four-Factor Analysis

A separate four-factor analysis should be completed for each unit listed above that is not exempt from four-factor analysis. The four-factor analysis must include an evaluation of technically feasible SO₂ emission control measures and a proposed determination of whether it is reasonable to require any control measure(s) for each unit. The owner or operator must characterize the four factors listed in Clean Air Act Section 169A(g)(1) for each technically feasible emission control measure:

- Cost of compliance;
- Time necessary for compliance;
- Energy and non-air quality environmental impacts of compliance; and
- Remaining useful life.

The owner or operator should also provide the control effectiveness and expected emission reductions that would be achieved by implementation of the measure for each technically feasible emission control measure. If a control measure is not technically feasible, the owner or operator should provide justification for this determination. EPA's Regional Haze Guidance provides information on how to determine which emission control measures to consider⁴ and how to characterize each of the four factors.⁵ The facility should consult this guidance in developing the four-factor analysis.

The Department will work with the facility to issue an air construction permit for any emission control measure(s) determined to be reasonable for each emissions unit addressed in the analysis. The permit will require the owner or operator of the affected emissions units to comply with the control measures as expeditiously as practicable, but not later than December 31, 2028. The permit will require an operation and maintenance plan for any control equipment required by the Department's determination. These permits will be submitted as part of Florida's Regional Haze SIP, making them permanent and federally enforceable.

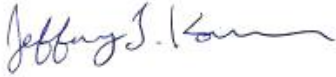
The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule. Thus, for the units listed above, if by October 23, 2020 the owner or operator has not submitted an adequate four-factor analysis, and the owner or operator does not submit an adequate analysis justifying exemption from four-factor analysis by August 21, 2020, the Department will identify whether there are any cost-effective control measures available for each unit and issue an administrative order that establishes control measures based on the four factors, taking into consideration all information available. The Department will state the basis for its determination(s) in a technical evaluation document supporting the issuance of any administrative order.

⁴ See pages 28-30 of Regional Haze Guidance.

⁵ See pages 31-33 of Regional Haze Guidance.

Thank you for your cooperation with this request. If you have any questions about the reasonable progress four-factor analysis, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,

A handwritten signature in blue ink that reads "Jeff Koerner". The signature is written in a cursive style with a long, sweeping underline.

Jeff Koerner, Director
Division of Air Resource Management



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

Via Electronic Mail

To: Mosaic Fertilizer LLC, New Wales Facility
From: Division of Air Resource Management
Date: June 22, 2020
Subject: Regional Haze Rule - Reasonable Progress Analysis

The Florida Department of Environmental Protection (Department) requests that Mosaic Fertilizer LLC, New Wales Facility (New Wales) complete and submit to the Department an analysis for selected emission units at your facility regarding the availability of emission controls needed to ensure reasonable progress to visibility goals at Class I areas in and around the State of Florida. For each selected unit, you must provide either a reasonable progress four-factor technical analysis or an analysis demonstrating that the unit meets the “effectively controlled unit” exemption at the facility following the instructions below.

1. Background

The U.S. Environmental Protection Agency (EPA) Regional Haze Rule requires states to submit a series of State Implementation Plans (SIPs) to protect visibility in national parks and wilderness areas known as mandatory Federal Class I areas. Regional Haze SIPs for the second implementation period (2018 – 2028) are due July 31, 2021. EPA has distributed final guidance¹ on the second implementation period that the Department is following throughout the SIP development process. The following Class I areas in or near Florida are subject to the Regional Haze Rule:

- Chassahowitzka National Wildlife Refuge
- Everglades National Park
- St. Marks National Wildlife Refuge
- Okefenokee National Wildlife Refuge (Georgia)
- Wolf Island National Wildlife Refuge (Georgia)

Pursuant to 40 CFR 51.308(f)(2)(i), as part of the SIP development process, states must evaluate and determine whether any cost-effective emission reduction measures and strategies are available to ensure reasonable progress toward natural visibility conditions in each Class I area in

¹ Guidance on Regional Haze State Implementation Plans for the Second Implementation Period (Regional Haze Guidance). Peter Tsirigotis Memorandum dated August 20, 2019, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711, available at: https://www.epa.gov/sites/production/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf

the current implementation period. A reasonable progress four-factor analysis considers emission reduction measures against four factors (the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and remaining useful life) to determine if any cost-effective measures are available for ensuring reasonable progress toward natural visibility conditions.

Point sources emitting SO₂, which contribute to the formation of visibility-impairing sulfates, typically have the most significant impact on anthropogenic visibility impairment in Class I areas. To determine which sources should undergo a reasonable progress four factor analysis, the Department first screened sources using an Area of Influence (AOI) analysis. The AOI analysis evaluates a source's 2028 projected actual emissions, distance to Class I area, and wind trajectories to estimate the source's relative contribution to visibility impairment at each Class I area. The Department further analyzed sources with at least 5 percent relative contribution through source apportionment modeling.

Source apportionment modeling tracks a source's SO₂ emissions and directly calculates how much sulfate visibility impairment in a Class I area is attributable to that source. Florida identified a threshold of 1 percent contribution to visibility impairment from sulfates relative to the total visibility impairment from point source sulfate as an appropriate threshold that would select only those sources that are projected to have a significant impact on visibility impairment in Class I areas in 2028.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule and is asking for your cooperation to meet those requirements. With a contribution of 2.60 percent to sulfates at Everglades National Park based on projected 2028 SO₂ emissions of 4,491 tons per year, the Department identified New Wales as a source that must undergo a reasonable progress analysis for SO₂ emissions.

The units listed below are projected to emit more than 5 tons per year of SO₂ in 2028. Units emitting less than this are not expected to have a significant impact on visibility impairment. For each unit listed below, the Department requests that New Wales complete and submit either a reasonable progress four-factor technical analysis, following the instructions in **Section 2** below, or an analysis demonstrating that a four-factor analysis is not required for that unit if it meets one of the exemptions discussed below this list:

- EU002 – No. 1 Sulfuric Acid Plant
- EU003 – No. 2 Sulfuric Acid Plant
- EU004 – No. 3 Sulfuric Acid Plant
- EU042 – No. 4 Sulfuric Acid Plant
- EU044 – No. 5 Sulfuric Acid Plant

A four-factor analysis is not required for units that are effectively-controlled under an enforceable requirement² or that will be shutting down by December 31, 2028 under an

² See pages 22-25 of Regional Haze Guidance.

enforceable requirement³, per EPA's Regional Haze Guidance. If the owner or operator determines that a unit meets one of these exemptions, the Department requests that the owner or operator submit an analysis justifying this determination by August 21, 2020. For all other units, the Department requests that a four-factor technical analysis be submitted for each unit, following the instructions in **Section 2** below, by October 23, 2020.

2. Instructions on Completing a Reasonable Progress Four-Factor Analysis

A separate four-factor analysis should be completed for each unit listed above that is not exempt from four-factor analysis. The four-factor analysis must include an evaluation of technically feasible SO₂ emission control measures and a proposed determination of whether it is reasonable to require any control measure(s) for each unit. The owner or operator must characterize the four factors listed in Clean Air Act Section 169A(g)(1) for each technically feasible emission control measure:

- Cost of compliance;
- Time necessary for compliance;
- Energy and non-air quality environmental impacts of compliance; and
- Remaining useful life.

The owner or operator should also provide the control effectiveness and expected emission reductions that would be achieved by implementation of the measure for each technically feasible emission control measure. If a control measure is not technically feasible, the owner or operator should provide justification for this determination. EPA's Regional Haze Guidance provides information on how to determine which emission control measures to consider⁴ and how to characterize each of the four factors.⁵ The facility should consult this guidance in developing the four-factor analysis.

The Department will work with the facility to issue an air construction permit for any emission control measure(s) determined to be reasonable for each emissions unit addressed in the analysis. The permit will require the owner or operator of the affected emissions units to comply with the control measures as expeditiously as practicable, but not later than December 31, 2028. The permit will require an operation and maintenance plan for any control equipment required by the Department's determination. These permits will be submitted as part of Florida's Regional Haze SIP, making them permanent and federally enforceable.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule. Thus, for the units listed above, if by October 23, 2020 the owner or operator has not submitted an adequate four-factor analysis, and the owner or operator does not submit an adequate analysis justifying exemption from four-factor analysis by August 21, 2020, the Department will identify whether there are any cost-effective control measures available for each unit and issue an administrative order that establishes control measures based on the four factors, taking into consideration all information available. The Department will state the basis for its

³ See page 20 of Regional Haze Guidance.

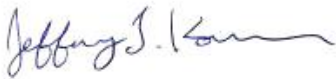
⁴ See pages 28-30 of Regional Haze Guidance.

⁵ See pages 31-33 of Regional Haze Guidance.

determination(s) in a technical evaluation document supporting the issuance of any administrative order.

Thank you for your cooperation with this request. If you have any questions about the reasonable progress four-factor analysis, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Koerner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeff Koerner, Director
Division of Air Resource Management



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

Via Electronic Mail

To: Nutrien White Springs Agricultural Chemicals
From: Division of Air Resource Management
Date: June 22, 2020
Subject: Regional Haze Rule - Reasonable Progress Analysis

The Florida Department of Environmental Protection (Department) requests that Nutrien White Springs Agricultural Chemicals (Nutrien) complete and submit to the Department an analysis for selected emission units at your facility regarding the availability of emission controls needed to ensure reasonable progress to visibility goals at Class I areas in and around the State of Florida. For each selected unit, you must provide either a reasonable progress four-factor technical analysis or an analysis demonstrating that the unit meets the “effectively controlled unit” exemption at the facility following the instructions below.

1. Background

The U.S. Environmental Protection Agency (EPA) Regional Haze Rule requires states to submit a series of State Implementation Plans (SIPs) to protect visibility in national parks and wilderness areas known as mandatory Federal Class I areas. Regional Haze SIPs for the second implementation period (2018 – 2028) are due July 31, 2021. EPA has distributed final guidance¹ on the second implementation period that the Department is following throughout the SIP development process. The following Class I areas in or near Florida are subject to the Regional Haze Rule:

- Chassahowitzka National Wildlife Refuge
- Everglades National Park
- St. Marks National Wildlife Refuge
- Okefenokee National Wildlife Refuge (Georgia)
- Wolf Island National Wildlife Refuge (Georgia)

Pursuant to 40 CFR 51.308(f)(2)(i), as part of the SIP development process, states must evaluate and determine whether any cost-effective emission reduction measures and strategies are available to ensure reasonable progress toward natural visibility conditions in each Class I area in

¹ Guidance on Regional Haze State Implementation Plans for the Second Implementation Period (Regional Haze Guidance). Peter Tsirigotis Memorandum dated August 20, 2019, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711, available at: https://www.epa.gov/sites/production/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf

the current implementation period. A reasonable progress four-factor analysis considers emission reduction measures against four factors (the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and remaining useful life) to determine if any cost-effective measures are available for ensuring reasonable progress toward natural visibility conditions.

Point sources emitting SO₂, which contribute to the formation of visibility-impairing sulfates, typically have the most significant impact on anthropogenic visibility impairment in Class I areas. To determine which sources should undergo a reasonable progress four factor analysis, the Department first screened sources using an Area of Influence (AOI) analysis. The AOI analysis evaluates a source's 2028 projected actual emissions, distance to Class I area, and wind trajectories to estimate the source's relative contribution to visibility impairment at each Class I area. The Department further analyzed sources with at least 5 percent relative contribution through source apportionment modeling.

Source apportionment modeling tracks a source's SO₂ emissions and directly calculates how much sulfate visibility impairment in a Class I area is attributable to that source. Florida identified a threshold of 1 percent contribution to visibility impairment from sulfates relative to the total visibility impairment from point source sulfate as an appropriate threshold that would select only those sources that are projected to have a significant impact on visibility impairment in Class I areas in 2028.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule and is asking for your cooperation to meet those requirements. With a contribution of 2.77 percent to sulfates at Okefenokee National Wildlife Refuge based on projected 2028 SO₂ emissions of 1,557 tons per year, the Department identified Nutrien as a source that must undergo a reasonable progress analysis for SO₂ emissions.

The units listed below are projected to emit more than 5 tons per year of SO₂ in 2028. Units emitting less than this are not expected to have a significant impact on visibility impairment. For each unit listed below, the Department requests that Nutrien complete and submit either a reasonable progress four-factor technical analysis, following the instructions in **Section 2** below, or an analysis demonstrating that a four-factor analysis is not required for that unit if it meets one of the exemptions discussed below this list:

- EU066 – Sulfuric Acid Plant E
- EU067 – Sulfuric Acid Plant F

A four-factor analysis is not required for units that are effectively-controlled under an enforceable requirement² or that will be shutting down by December 31, 2028 under an enforceable requirement³, per EPA's Regional Haze Guidance. If the owner or operator determines that a unit meets one of these exemptions, the Department requests that the owner or operator submit an analysis justifying this determination by August 21, 2020. For all other units,

² See pages 22-25 of Regional Haze Guidance.

³ See page 20 of Regional Haze Guidance.

the Department requests that a four-factor technical analysis be submitted for each unit, following the instructions in **Section 2** below, by October 23, 2020.

2. Instructions on Completing a Reasonable Progress Four-Factor Analysis

A separate four-factor analysis should be completed for each unit listed above that is not exempt from four-factor analysis. The four-factor analysis must include an evaluation of technically feasible SO₂ emission control measures and a proposed determination of whether it is reasonable to require any control measure(s) for each unit. The owner or operator must characterize the four factors listed in Clean Air Act Section 169A(g)(1) for each technically feasible emission control measure:

- Cost of compliance;
- Time necessary for compliance;
- Energy and non-air quality environmental impacts of compliance; and
- Remaining useful life.

The owner or operator should also provide the control effectiveness and expected emission reductions that would be achieved by implementation of the measure for each technically feasible emission control measure. If a control measure is not technically feasible, the owner or operator should provide justification for this determination. EPA's Regional Haze Guidance provides information on how to determine which emission control measures to consider⁴ and how to characterize each of the four factors.⁵ The facility should consult this guidance in developing the four-factor analysis.

The Department will work with the facility to issue an air construction permit for any emission control measure(s) determined to be reasonable for each emissions unit addressed in the analysis. The permit will require the owner or operator of the affected emissions units to comply with the control measures as expeditiously as practicable, but not later than December 31, 2028. The permit will require an operation and maintenance plan for any control equipment required by the Department's determination. These permits will be submitted as part of Florida's Regional Haze SIP, making them permanent and federally enforceable.

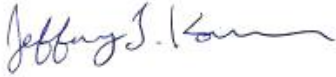
The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule. Thus, for the units listed above, if by October 23, 2020 the owner or operator has not submitted an adequate four-factor analysis, and the owner or operator does not submit an adequate analysis justifying exemption from four-factor analysis by August 21, 2020, the Department will identify whether there are any cost-effective control measures available for each unit and issue an administrative order that establishes control measures based on the four factors, taking into consideration all information available. The Department will state the basis for its determination(s) in a technical evaluation document supporting the issuance of any administrative order.

⁴ See pages 28-30 of Regional Haze Guidance.

⁵ See pages 31-33 of Regional Haze Guidance.

Thank you for your cooperation with this request. If you have any questions about the reasonable progress four-factor analysis, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,

A handwritten signature in blue ink that reads "Jeff Koerner". The signature is written in a cursive style with a long, sweeping underline.

Jeff Koerner, Director
Division of Air Resource Management



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

Via Electronic Mail

To: Seminole Electric – Seminole Generating Station
From: Division of Air Resource Management
Date: August 18, 2020
Subject: Regional Haze Rule - Reasonable Progress Analysis

The Florida Department of Environmental Protection (Department) requests that Seminole Electric Seminole Generating Station (SGS) complete and submit to the Department an analysis for selected emission units at your facility regarding the availability of emission controls needed to ensure reasonable progress to visibility goals at Class I areas in and around the State of Florida. For each selected unit, you must provide either a reasonable progress four-factor technical analysis or an analysis demonstrating that the unit meets the “effectively controlled unit” exemption at the facility following the instructions below.

1. Background

The U.S. Environmental Protection Agency (EPA) Regional Haze Rule requires states to submit a series of State Implementation Plans (SIPs) to protect visibility in national parks and wilderness areas known as mandatory Federal Class I areas. Regional Haze SIPs for the second implementation period (2018 – 2028) are due July 31, 2021. EPA has distributed final guidance¹ on the second implementation period that the Department is following throughout the SIP development process. The following Class I areas in or near Florida are subject to the Regional Haze Rule:

- Chassahowitzka National Wildlife Refuge
- Everglades National Park
- St. Marks National Wildlife Refuge
- Okefenokee National Wildlife Refuge (Georgia)
- Wolf Island National Wildlife Refuge (Georgia)

Pursuant to 40 CFR 51.308(f)(2)(i), as part of the SIP development process, states must evaluate and determine whether any cost-effective emission reduction measures and strategies are available to ensure reasonable progress toward natural visibility conditions in each Class I area in

¹ Guidance on Regional Haze State Implementation Plans for the Second Implementation Period (Regional Haze Guidance). Peter Tsirigotis Memorandum dated August 20, 2019, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711, available at: https://www.epa.gov/sites/production/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf

the current implementation period. A reasonable progress four-factor analysis considers emission reduction measures against four factors (the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and remaining useful life) to determine if any cost-effective measures are available for ensuring reasonable progress toward natural visibility conditions.

Point sources emitting SO₂, which contribute to the formation of visibility-impairing sulfates, typically have the most significant impact on anthropogenic visibility impairment in Class I areas. To determine which sources should undergo a reasonable progress four factor analysis, the Department screened sources using an Area of Influence (AOI) analysis. The AOI analysis evaluates a source's 2028 projected actual emissions, distance to Class I area, and wind trajectories to estimate the source's contributions to visibility impairment at each Class I area.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule and is asking for your cooperation to meet those requirements. With a contribution of 3.53 percent to sulfates at Okefenokee National Wildlife Refuge based on projected 2028 SO₂ emissions of 3,713.4 tons per year, the Department identified SGS as a source that must undergo a reasonable progress analysis for SO₂ emissions.

The units listed below are projected to emit more than 5 tons per year of SO₂ in 2028. Units emitting less than this are not expected to have a significant impact on visibility impairment. For each unit listed below, the Department requests that SGS complete and submit either a reasonable progress four-factor technical analysis, following the instructions in **Section 2** below, or an analysis demonstrating that a four-factor analysis is not required for that unit if it meets one of the exemptions discussed below this list:

- EU001 – Steam Electric Generator No. 1
- EU002 – Steam Electric Generator No. 2

A four-factor analysis is not required for units that are effectively-controlled under an enforceable requirement² or that will be shutting down by December 31, 2028 under an enforceable requirement³, per EPA's Regional Haze Guidance. If the owner or operator determines that a unit meets one of these exemptions, the Department requests that the owner or operator submit an analysis justifying this determination by October 23, 2020. For all other units, the Department requests that a four-factor technical analysis be submitted for each unit, following the instructions in **Section 2** below, by November 23, 2020.

2. Instructions on Completing a Reasonable Progress Four-Factor Analysis

A separate four-factor analysis should be completed for each unit listed above if it is not exempt from four-factor analysis. The four-factor analysis must include an evaluation of technically feasible SO₂ emission control measures and a proposed determination of whether it is reasonable to require any control measure(s) for the unit. The owner or operator must characterize the four

² See pages 22-25 of Regional Haze Guidance.

³ See page 20 of Regional Haze Guidance.

factors listed in Clean Air Act Section 169A(g)(1) for each technically feasible emission control measure:

- Cost of compliance;
- Time necessary for compliance;
- Energy and non-air quality environmental impacts of compliance; and
- Remaining useful life.

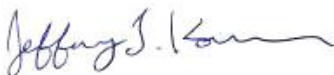
The owner or operator should also provide the control effectiveness and expected emission reductions that would be achieved by implementation of the measure for each technically feasible emission control measure. If a control measure is not technically feasible, the owner or operator should provide justification for this determination. EPA's Regional Haze Guidance provides information on how to determine which emission control measures to consider⁴ and how to characterize each of the four factors.⁵ The facility should consult this guidance in developing the four-factor analysis.

The Department will work with the facility to issue an air construction permit for any emission control measure(s) determined to be reasonable for each emissions unit addressed in the analysis. The permit will require the owner or operator of the affected emissions unit to comply with the control measures as expeditiously as practicable, but not later than December 31, 2028. The permit will require an operation and maintenance plan for any control equipment required by the Department's determination. These permits will be submitted as part of Florida's Regional Haze SIP, making them permanent and federally enforceable.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule. Thus, for the units listed above, if by November 23, 2020 the owner or operator has not submitted an adequate four-factor analysis, and the owner or operator does not submit an adequate analysis justifying exemption from four-factor analysis by October 23, 2020, the Department will identify whether there are any cost-effective control measures available for each unit and issue an administrative order that establishes control measures based on the four factors, taking into consideration all information available. The Department will state the basis for its determination(s) in a technical evaluation document supporting the issuance of any administrative order.

Thank you for your cooperation with this request. If you have any questions about the reasonable progress four-factor analysis, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,



Jeff Koerner, Director
Division of Air Resource Management

⁴ See pages 28-30 of Regional Haze Guidance.

⁵ See pages 31-33 of Regional Haze Guidance.



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

Via Electronic Mail

To: Tampa Electric Company Big Bend Station
From: Division of Air Resource Management
Date: June 22, 2020
Subject: Regional Haze Rule - Reasonable Progress Analysis

The Florida Department of Environmental Protection (Department) requests that Tampa Electric Company Big Bend Station (Big Bend) complete and submit to the Department an analysis for selected emission units at your facility regarding the availability of emission controls needed to ensure reasonable progress to visibility goals at Class I areas in and around the State of Florida. For each selected unit, you must provide either a reasonable progress four-factor technical analysis or an analysis demonstrating that the unit meets the “effectively controlled unit” exemption at the facility following the instructions below.

1. Background

The U.S. Environmental Protection Agency (EPA) Regional Haze Rule requires states to submit a series of State Implementation Plans (SIPs) to protect visibility in national parks and wilderness areas known as mandatory Federal Class I areas. Regional Haze SIPs for the second implementation period (2018 – 2028) are due July 31, 2021. EPA has distributed final guidance¹ on the second implementation period that the Department is following throughout the SIP development process. The following Class I areas in or near Florida are subject to the Regional Haze Rule:

- Chassahowitzka National Wildlife Refuge
- Everglades National Park
- St. Marks National Wildlife Refuge
- Okefenokee National Wildlife Refuge (Georgia)
- Wolf Island National Wildlife Refuge (Georgia)

Pursuant to 40 CFR 51.308(f)(2)(i), as part of the SIP development process, states must evaluate and determine whether any cost-effective emission reduction measures and strategies are available to ensure reasonable progress toward natural visibility conditions in each Class I area in

¹ Guidance on Regional Haze State Implementation Plans for the Second Implementation Period (Regional Haze Guidance). Peter Tsirigotis Memorandum dated August 20, 2019, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711, available at: https://www.epa.gov/sites/production/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf

the current implementation period. A reasonable progress four-factor analysis considers emission reduction measures against four factors (the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and remaining useful life) to determine if any cost-effective measures are available for ensuring reasonable progress toward natural visibility conditions.

Point sources emitting SO₂, which contribute to the formation of visibility-impairing sulfates, typically have the most significant impact on anthropogenic visibility impairment in Class I areas. To determine which sources should undergo a reasonable progress four factor analysis, the Department first screened sources using an Area of Influence (AOI) analysis. The AOI analysis evaluates a source's 2028 projected actual emissions, distance to Class I area, and wind trajectories to estimate the source's relative contribution to visibility impairment at each Class I area. The Department further analyzed sources with at least 5 percent relative contribution through source apportionment modeling.

Source apportionment modeling tracks a source's SO₂ emissions and directly calculates how much sulfate visibility impairment in a Class I area is attributable to that source. Florida identified a threshold of 1 percent contribution to visibility impairment from sulfates relative to the total visibility impairment from point source sulfate as an appropriate threshold that would select only those sources that are projected to have a significant impact on visibility impairment in Class I areas in 2028.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule and is asking for your cooperation to meet those requirements. With a contribution of 1.28 percent to sulfates at Chassahowitzka National Wildlife Refuge and 3.30 percent to sulfates at Everglades National Park based on projected 2028 SO₂ emissions of 6,084.9 tons per year, the Department identified Big Bend as a source that must undergo a reasonable progress analysis for SO₂ emissions.

The units listed below are projected to emit more than 5 tons per year of SO₂ in 2028. Units emitting less than this are not expected to have a significant impact on visibility impairment. For each unit listed below, the Department requests that Big Bend complete and submit either a reasonable progress four-factor technical analysis, following the instructions in **Section 2** below, or an analysis demonstrating that a four-factor analysis is not required for that unit if it meets one of the exemptions discussed below this list:

- EU003 – Fossil Fuel Fired Steam Generator No. 3
- EU004 – Fossil Fuel Fired Steam Generator No. 4

A four-factor analysis is not required for units that are effectively-controlled under an enforceable requirement² or that will be shutting down by December 31, 2028 under an enforceable requirement³, per EPA's Regional Haze Guidance. If the owner or operator determines that a unit meets one of these exemptions, the Department requests that the owner or operator submit an analysis justifying this determination by August 21, 2020. For all other units,

² See pages 22-25 of Regional Haze Guidance.

³ See page 20 of Regional Haze Guidance.

the Department requests that a four-factor technical analysis be submitted for each unit, following the instructions in **Section 2** below, by October 23, 2020.

2. Instructions on Completing a Reasonable Progress Four-Factor Analysis

A separate four-factor analysis should be completed for each unit listed above that is not exempt from four-factor analysis. The four-factor analysis must include an evaluation of technically feasible SO₂ emission control measures and a proposed determination of whether it is reasonable to require any control measure(s) for each unit. The owner or operator must characterize the four factors listed in Clean Air Act Section 169A(g)(1) for each technically feasible emission control measure:

- Cost of compliance;
- Time necessary for compliance;
- Energy and non-air quality environmental impacts of compliance; and
- Remaining useful life.

The owner or operator should also provide the control effectiveness and expected emission reductions that would be achieved by implementation of the measure for each technically feasible emission control measure. If a control measure is not technically feasible, the owner or operator should provide justification for this determination. EPA's Regional Haze Guidance provides information on how to determine which emission control measures to consider⁴ and how to characterize each of the four factors.⁵ The facility should consult this guidance in developing the four-factor analysis.

The Department will work with the facility to issue an air construction permit for any emission control measure(s) determined to be reasonable for each emissions unit addressed in the analysis. The permit will require the owner or operator of the affected emissions units to comply with the control measures as expeditiously as practicable, but not later than December 31, 2028. The permit will require an operation and maintenance plan for any control equipment required by the Department's determination. These permits will be submitted as part of Florida's Regional Haze SIP, making them permanent and federally enforceable.

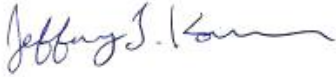
The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule. Thus, for the units listed above, if by October 23, 2020 the owner or operator has not submitted an adequate four-factor analysis, and the owner or operator does not submit an adequate analysis justifying exemption from four-factor analysis by August 21, 2020, the Department will identify whether there are any cost-effective control measures available for each unit and issue an administrative order that establishes control measures based on the four factors, taking into consideration all information available. The Department will state the basis for its determination(s) in a technical evaluation document supporting the issuance of any administrative order.

⁴ See pages 28-30 of Regional Haze Guidance.

⁵ See pages 31-33 of Regional Haze Guidance.

Thank you for your cooperation with this request. If you have any questions about the reasonable progress four-factor analysis, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,

A handwritten signature in blue ink that reads "Jeff Koerner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeff Koerner, Director
Division of Air Resource Management



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

Via Electronic Mail

To: WestRock Fernandina Beach Mill
From: Division of Air Resource Management
Date: June 22, 2020
Subject: Regional Haze Rule - Reasonable Progress Analysis

The Florida Department of Environmental Protection (Department) requests that WestRock Fernandina Beach Mill complete and submit to the Department an analysis for selected emission units at your facility regarding the availability of emission controls needed to ensure reasonable progress to visibility goals at Class I areas in and around the State of Florida. For each selected unit, you must provide either a reasonable progress four-factor technical analysis or an analysis demonstrating that the unit meets the “effectively controlled unit” exemption at the facility following the instructions below.

1. Background

The U.S. Environmental Protection Agency (EPA) Regional Haze Rule requires states to submit a series of State Implementation Plans (SIPs) to protect visibility in national parks and wilderness areas known as mandatory Federal Class I areas. Regional Haze SIPs for the second implementation period (2018 – 2028) are due July 31, 2021. EPA has distributed final guidance¹ on the second implementation period that the Department is following throughout the SIP development process. The following Class I areas in or near Florida are subject to the Regional Haze Rule:

- Chassahowitzka National Wildlife Refuge
- Everglades National Park
- St. Marks National Wildlife Refuge
- Okefenokee National Wildlife Refuge (Georgia)
- Wolf Island National Wildlife Refuge (Georgia)

Pursuant to 40 CFR 51.308(f)(2)(i), as part of the SIP development process, states must evaluate and determine whether any cost-effective emission reduction measures and strategies are available to ensure reasonable progress toward natural visibility conditions in each Class I area in

¹ Guidance on Regional Haze State Implementation Plans for the Second Implementation Period (Regional Haze Guidance). Peter Tsirigotis Memorandum dated August 20, 2019, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711, available at: https://www.epa.gov/sites/production/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf

the current implementation period. A reasonable progress four-factor analysis considers emission reduction measures against four factors (the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and remaining useful life) to determine if any cost-effective measures are available for ensuring reasonable progress toward natural visibility conditions.

Point sources emitting SO₂, which contribute to the formation of visibility-impairing sulfates, typically have the most significant impact on anthropogenic visibility impairment in Class I areas. To determine which sources should undergo a reasonable progress four factor analysis, the Department first screened sources using an Area of Influence (AOI) analysis. The AOI analysis evaluates a source's 2028 projected actual emissions, distance to Class I area, and wind trajectories to estimate the source's relative contribution to visibility impairment at each Class I area. The Department further analyzed sources with at least 5 percent relative contribution through source apportionment modeling.

Source apportionment modeling tracks a source's SO₂ emissions and directly calculates how much sulfate visibility impairment in a Class I area is attributable to that source. Florida identified a threshold of 1 percent contribution to visibility impairment from sulfates relative to the total visibility impairment from point source sulfate as an appropriate threshold that would select only those sources that are projected to have a significant impact on visibility impairment in Class I areas in 2028.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule and is asking for your cooperation to meet those requirements. With a contribution of 2.35 percent to sulfates at Wolf Island National Wildlife Refuge based on projected 2028 SO₂ emissions of 2,607 tons per year, the Department identified WestRock Fernandina Beach Mill as a source that must undergo a reasonable progress analysis for SO₂ emissions.

The units listed below are projected to emit more than 5 tons per year of SO₂ in 2028. Units emitting less than this are not expected to have a significant impact on visibility impairment. For each unit listed below, the Department requests that WestRock Fernandina Beach Mill complete and submit either a reasonable progress four-factor technical analysis, following the instructions in **Section 2** below, or an analysis demonstrating that a four-factor analysis is not required for that unit if it meets one of the exemptions discussed below this list:

- EU006 – No. 5 Power Boiler
- EU007 – No. 4 Recovery Boiler
- EU011 – No. 5 Recovery Boiler
- EU015 – No. 7 Power Boiler

A four-factor analysis is not required for units that are effectively-controlled under an enforceable requirement² or that will be shutting down by December 31, 2028 under an enforceable requirement³, per EPA's Regional Haze Guidance. If the owner or operator determines that a unit meets one of these exemptions, the Department requests that the owner or

² See pages 22-25 of Regional Haze Guidance.

³ See page 20 of Regional Haze Guidance.

operator submit an analysis justifying this determination by August 21, 2020. For all other units, the Department requests that a four-factor technical analysis be submitted for each unit, following the instructions in **Section 2** below, by October 23, 2020.

2. Instructions on Completing a Reasonable Progress Four-Factor Analysis

A separate four-factor analysis should be completed for each unit listed above that is not exempt from four-factor analysis. The four-factor analysis must include an evaluation of technically feasible SO₂ emission control measures and a proposed determination of whether it is reasonable to require any control measure(s) for each unit. The owner or operator must characterize the four factors listed in Clean Air Act Section 169A(g)(1) for each technically feasible emission control measure:

- Cost of compliance;
- Time necessary for compliance;
- Energy and non-air quality environmental impacts of compliance; and
- Remaining useful life.

The owner or operator should also provide the control effectiveness and expected emission reductions that would be achieved by implementation of the measure for each technically feasible emission control measure. If a control measure is not technically feasible, the owner or operator should provide justification for this determination. EPA's Regional Haze Guidance provides information on how to determine which emission control measures to consider⁴ and how to characterize each of the four factors.⁵ The facility should consult this guidance in developing the four-factor analysis.

The Department will work with the facility to issue an air construction permit for any emission control measure(s) determined to be reasonable for each emissions unit addressed in the analysis. The permit will require the owner or operator of the affected emissions units to comply with the control measures as expeditiously as practicable, but not later than December 31, 2028. The permit will require an operation and maintenance plan for any control equipment required by the Department's determination. These permits will be submitted as part of Florida's Regional Haze SIP, making them permanent and federally enforceable.

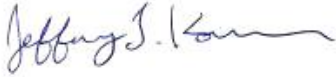
The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule. Thus, for the units listed above, if by October 23, 2020 the owner or operator has not submitted an adequate four-factor analysis, and the owner or operator does not submit an adequate analysis justifying exemption from four-factor analysis by August 21, 2020, the Department will identify whether there are any cost-effective control measures available for each unit and issue an administrative order that establishes control measures based on the four factors, taking into consideration all information available. The Department will state the basis for its determination(s) in a technical evaluation document supporting the issuance of any administrative order.

⁴ See pages 28-30 of Regional Haze Guidance.

⁵ See pages 31-33 of Regional Haze Guidance.

Thank you for your cooperation with this request. If you have any questions about the reasonable progress four-factor analysis, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,

A handwritten signature in blue ink that reads "Jeff Koerner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeff Koerner, Director
Division of Air Resource Management



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

Via Electronic Mail

To: WestRock Panama City Mill
From: Division of Air Resource Management
Date: June 22, 2020
Subject: Regional Haze Rule - Reasonable Progress Analysis

The Florida Department of Environmental Protection (Department) requests that WestRock Panama City Mill complete and submit to the Department an analysis for selected emission units at your facility regarding the availability of emission controls needed to ensure reasonable progress to visibility goals at Class I areas in and around the State of Florida. For each selected unit, you must provide either a reasonable progress four-factor technical analysis or an analysis demonstrating that the unit meets the “effectively controlled unit” exemption at the facility following the instructions below.

1. Background

The U.S. Environmental Protection Agency (EPA) Regional Haze Rule requires states to submit a series of State Implementation Plans (SIPs) to protect visibility in national parks and wilderness areas known as mandatory Federal Class I areas. Regional Haze SIPs for the second implementation period (2018 – 2028) are due July 31, 2021. EPA has distributed final guidance¹ on the second implementation period that the Department is following throughout the SIP development process. The following Class I areas in or near Florida are subject to the Regional Haze Rule:

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Pursuant to 40 CFR 51.308(f)(2)(i), as part of the SIP development process, states must evaluate and determine whether any cost-effective emission reduction measures and strategies are available to ensure reasonable progress toward natural visibility conditions in each Class I area in

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the current implementation period. A reasonable progress four-factor analysis considers emission reduction measures against four factors (the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and remaining useful life) to determine if any cost-effective measures are available for ensuring reasonable progress toward natural visibility conditions.

Point sources emitting SO₂, which contribute to the formation of visibility-impairing sulfates, typically have the most significant impact on anthropogenic visibility impairment in Class I areas. To determine which sources should undergo a reasonable progress four factor analysis, the Department first screened sources using an Area of Influence (AOI) analysis. The AOI analysis evaluates a source's 2028 projected actual emissions, distance to Class I area, and wind trajectories to estimate the source's relative contribution to visibility impairment at each Class I area. The Department further analyzed sources with at least 5 percent relative contribution through source apportionment modeling.

Source apportionment modeling tracks a source's SO₂ emissions and directly calculates how much sulfate visibility impairment in a Class I area is attributable to that source. Florida identified a threshold of 1 percent contribution to visibility impairment from sulfates relative to the total visibility impairment from point source sulfate as an appropriate threshold that would select only those sources that are projected to have a significant impact on visibility impairment in Class I areas in 2028.

The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule and is asking for your cooperation to meet those requirements. With a contribution of 4.60 percent to sulfates at St. Marks National Wildlife Refuge based on projected 2028 SO₂ emissions of 2,591 tons per year, the Department identified WestRock Panama City Mill as a source that must undergo a reasonable progress analysis for SO₂ emissions.

The units listed below are projected to emit more than 5 tons per year of SO₂ in 2028. Units emitting less than this are not expected to have a significant impact on visibility impairment. For each unit listed below, the Department requests that WestRock Panama City Mill complete and submit either a reasonable progress four-factor technical analysis, following the instructions in **Section 2** below, or an analysis demonstrating that a four-factor analysis is not required for that unit if it meets one of the exemptions discussed below this list:

- EU001 – No. 1 Recovery Boiler
- EU015 – No. 3 Combination Boiler
- EU016 – No. 4 Combination Boiler
- EU019 – No. 2 Recovery Boiler

A four-factor analysis is not required for units that are effectively-controlled under an enforceable requirement² or that will be shutting down by December 31, 2028 under an enforceable requirement³, per EPA's Regional Haze Guidance. If the owner or operator determines that a unit meets one of these exemptions, the Department requests that the owner or

² See pages 22-25 of Regional Haze Guidance.

³ See page 20 of Regional Haze Guidance.

operator submit an analysis justifying this determination by August 21, 2020. For all other units, the Department requests that a four-factor technical analysis be submitted for each unit, following the instructions in **Section 2** below, by October 23, 2020.

2. Instructions on Completing a Reasonable Progress Four-Factor Analysis

A separate four-factor analysis should be completed for each unit listed above that is not exempt from four-factor analysis. The four-factor analysis must include an evaluation of technically feasible SO₂ emission control measures and a proposed determination of whether it is reasonable to require any control measure(s) for each unit. The owner or operator must characterize the four factors listed in Clean Air Act Section 169A(g)(1) for each technically feasible emission control measure:

- Cost of compliance;
- Time necessary for compliance;
- Energy and non-air quality environmental impacts of compliance; and
- Remaining useful life.

The owner or operator should also provide the control effectiveness and expected emission reductions that would be achieved by implementation of the measure for each technically feasible emission control measure. If a control measure is not technically feasible, the owner or operator should provide justification for this determination. EPA's Regional Haze Guidance provides information on how to determine which emission control measures to consider⁴ and how to characterize each of the four factors.⁵ The facility should consult this guidance in developing the four-factor analysis.

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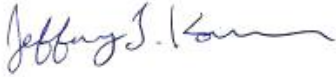
The Department intends to meet its obligation under the Clean Air Act and Regional Haze Rule. Thus, for the units listed above, if by October 23, 2020 the owner or operator has not submitted an adequate four-factor analysis, and the owner or operator does not submit an adequate analysis justifying exemption from four-factor analysis by August 21, 2020, the Department will identify whether there are any cost-effective control measures available for each unit and issue an administrative order that establishes control measures based on the four factors, taking into consideration all information available. The Department will state the basis for its determination(s) in a technical evaluation document supporting the issuance of any administrative order.

⁴ See pages 28-30 of Regional Haze Guidance.

⁵ See pages 31-33 of Regional Haze Guidance.

Thank you for your cooperation with this request. If you have any questions about the reasonable progress four-factor analysis, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,

A handwritten signature in blue ink that reads "Jeff Koerner". The signature is written in a cursive style with a long, sweeping underline.

Jeff Koerner, Director
Division of Air Resource Management