FLORIDA DEPARTMENT OF Environmental Protection

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Secretary

PERMITTEE

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

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

Air Permit No. 0890003-072-AC
Permit Expires: December 31, 2024
Minor Air Construction Permit
Fernandina Beach Mill
No. 7 Power Boiler Regional Haze SO_2 Reduction Project

PROJECT

This is the final air construction permit that establishes coal usage caps for the No. 7 Power Boiler (EU 015) to reduce emissions of sulfur dioxide (SO_2) for the purpose of complying with the Environmental Protection Agency's (EPA) Regional Haze Program. The project also involves several notification requirements. The existing Fernandina Beach Mill is a paperboard mill and manufacturers corrugated and solid fiber boxes categorized under Standard Industrial Classification Nos. 2631 and 2653. The existing facility is in Nassau County at North 8th Street in Fernandina Beach, Florida. The UTM coordinates are Zone 17, 356.2 kilometers (km) East and 3394.1 km North.

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

STATEMENT OF BASIS

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

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

Executed in Tallahassee, Florida

(DRAFT)

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

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CERTIFICATE OF SERVICE

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

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

Clerk Stamp

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

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FACILITY DESCRIPTION

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

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

PROPOSED PROJECT

The purpose of this project is to establish coal usage caps for the No. 7 Power Boiler (EU 015) to reduce emissions of SO_2 for the purpose of complying with the EPA's Regional Haze Program. The project also involves several notification requirements. The following EU will be affected by this project.

EU No.	Description
015	No. 7 Power Boiler

FACILITY REGULATORY CLASSIFICATION

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

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SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northeast District Office at: 8800 Baymeadows Way West, Suite 100, Jacksonville, FL 32256-7590.

3. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

4. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

5. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

6. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]

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A. No. 7 Power Boiler (EU 015)

This section of the permit addresses the following emissions unit.

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

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

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

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

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

EXISTING PERMIT CONDITIONS

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

NEW CONDITIONS RELATED TO EPA'S REGIONAL HAZE RULE

2. Coal Usage Cap No. 1: Effective on January 1, 2022, coal usage for the No. 7 Power Boiler shall not exceed 250 tons per day (TPD) based on a 30-day rolling average. The 250 TPD, 30-day rolling average coal cap excludes days on which a natural gas curtailment or supply interruption occurs as defined in 40 CFR 63, Subpart DDDDD (§63.7575). [Application No. 0890003-072-AC and Rule 62-210.200(PTE), F.A.C.]

3. Coal Usage Cap No. 2: Effective on April 1, 2024, coal usage for the No. 7 Power Boiler shall not exceed 125 TPD based on a 30-day rolling average. The 125 TPD, 30-day rolling average coal cap excludes days on which a natural gas curtailment or supply interruption occurs. [Application No. 0890003-072-AC and Rule 62-210.200(PTE), F.A.C.]

4. Notification of Gas Curtailment Events: The permittee shall notify the Permitting Authority within 5 business days of the start and end of any gas curtailment or supply interruption event and keep records onsite for a period of 5 years documenting each gas curtailment event. [Application No. 0890003-072-AC and Rule 62-4.070(3), F.A.C.]