FLORIDA DEPARTMENT OF Environmental Protection

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Secretary

PERMITTEE

WestRock CP, LLC
9469 Eastport Road
Jacksonville, Florida 32226

Authorized Representative:
Mr. Thomas Crockett, General Manager

Air Permit No. 0310067-019-AC
Permit Expires: June 30, 2022
Minor Air Construction Permit
Jacksonville Mill
Modification to No. 1 Paper Machine

PROJECT

This is the final air construction permit, which authorizes physical modifications to the No. 1 Paper Machine that will reduce paper machine downtime and improve safety. The WestRock CP, LLC, Jacksonville Mill, is an existing paper mill, which is categorized under Standard Industrial Classification Code No. 2621. The facility is in Duval County at 9469 Eastport Road in Jacksonville, Florida. The UTM coordinates of the existing facility are Zone 17, 442.4 kilometers (km) East and 3,365.4 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

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

CERTIFICATE OF SERVICE

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

Thomas Crockett, WestRock CP, LLC: tom.crockett@westrock.com
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Clerk Stamp

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

FACILITY DESCRIPTION

The Jacksonville Mill is a 100% recycled fiber facility that processes primarily old corrugated containers and double-lined kraft into recycled pulp to manufacture linerboard, medium and paper bags. This facility also purchases and utilizes bleached virgin pulp as an alternative raw material in its products. The Mill consists of three package steam boilers, two emergency engines and a fire pump. The Cedar Bay Cogeneration Plant previously provided the Mill with steam. However, the Cedar Bay Plant has been decommissioned and demolished. Therefore, each existing boiler can produce up to 150,000 lb/hour (450,000 lb/hour, combined) of steam to the Mill at all times. The boilers fire natural gas, primary, and No. 2 fuel oil with a sulfur content not to exceed 0.05% by weight as backup. Each boiler has a maximum heat input rate of 215 million British thermal units per hour (MMBtu/hour) when firing natural gas and 200 MMBtu/hour when firing No. 2 fuel oil.

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

EU No.	Emission Unit Description
Regulated Emissions Units	
022	Steam Boiler No. 1
023	Steam Boiler No. 2
026	Steam Boiler No. 3
037 & 038	Emergency Diesel Engines (335 HP and 47 HP)
039	Emergency Diesel Fire Pump (282 HP)
042	Paper Machine and Starch Silo Baghouses
Unregulated Emissions Units and Activities (see Appendix U, List of Unregulated Emissions Units and/or Activities)	
034	Paper Machine Area
035	Recycle Fiber Stock Prep Area
040	Facility-Wide Fugitive Emissions
041	Temporary Rental Natural Gas Fired Only Package Boilers < 99.5 MMBtu/hour

PROPOSED PROJECT

The purpose of this Project is to perform physical modifications on the No. 1 Paper Machine. The Mill is proposing to install a felt conditioning system, as well as modify the groove fillers to automatically thread paper tails through the machine. The modifications will reduce paper machine downtime by up to 140.5 hours, thus increasing the Mill's actual annual paper production throughput. However, the proposed Project will not impact steam generation in the existing Nos. 1-3 Package Boilers because the Mill does not drop the load on the package boilers during short-term paper machine downtime events. During these events, excess steam is condensed in the turbine to generate electricity.

This Project will affect the following emissions units.

EU No.	Description
034	Paper Machine Area
035	Recycle Fiber Stock Prep Area
040	Facility-Wide Fugitive Emissions
042	Paper Machine and Starch Silo Baghouses

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).

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

SECTION 2. ADMINISTRATIVE REQUIREMENTS

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

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

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).

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

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

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

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

8. Source Obligation:

   a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

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

9. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required

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

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
034	Paper Machine Area
035	Recycle Fiber Stock Prep Area
040	Facility-Wide Fugitive Emissions
042	Paper Machine and Starch Silo Baghouses

EQUIPMENT

1. No. 1 Paper Machine: The permittee is authorized to install rope groove fillers and a new automated felt conditioning system to clean, condition, and lubricate the No. 1 Paper Machine's press felts. The actual annual production rate of finished paper will increase by up to 14,753 air dried tons finished paper product (ADTFP) produced which will require additional recycle pulp furnish, raw water use, and processed wastewater at the wastewater treatment system. Approximately148 tons per year of additional starch could be used as a result of the increase to the Mill's actual annual paper production throughput. [Design, Application No. 0310067-019-AC]

   {Permitting Note: This permit does not authorize an increases to the maximum short-term production rate of 105 ADTFP/hour or the maximum annual production rate of 916,880 ADTFP/year.}