FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

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PERMITTEE

RockTenn CP, LLC
North 8th Street
Fernandina Beach, FL 32034

Authorized Representative:
Mr. Allen Sanders, General Manager

Air Permit No. 0890003-036-AC
Permit Expires: December 31, 2014
Issue Date: DRAFT
Fernandina Beach Kraft Pulp Mill
ARMS ID No. 0890003

Project: No. 1 and No. 2 Lime Bins
Baghouse Vent Reroute

This is the final air construction permit which authorizes the facility to reroute the exhaust from the No. 2 Lime Bin into the enclosed bucket elevator that feeds the No. 1 Lime Bin and vents through the No. 1 Lime Bin baghouse; thereby eliminating the No. 2 Lime Bin baghouse and vent stack. The project will eliminate an emission point (i.e. the No. 2 Lime Bin baghouse vent) and decrease the potential emissions of the Lime Bin baghouse vents from 10.6 tons per year (TPY) to 5.3 TPY. The proposed work will be conducted at the Fernandina Beach Pulp Mill, which is a Kraft Pulp Mill (Standard Industrial Classification No. 2611). The existing facility is located in Nassau County at North 8th Street in Fernandina Beach, Florida. The UTM coordinates are Zone 17: 456.2 km East; 3394.2 km North.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

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.

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 Jacksonville, Florida

DRAFT

_____
Khalid A. Al-Nahdy, P. E.
District Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) 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 _____ to the persons listed below.

Ms. Ana M. Oquendo, EPA Region 4 oquendo.ana@epa.gov
Mr. David Buff, P.E., Golder Associates, Inc.dbuff@golder.com
Mr. Allen Sanders, RockTenn CP, LLC asanders@rocktenn.com
Ms. Michelle Rundlett, RockTenn CP, LLC mrundlet@rocktenn.com

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.

DRAFT

_____ _____
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

This facility is a fully integrated Kraft linerboard mill that consists of major activities areas such as: wood yard, pulp mill, recycle plant, chemical recovery, power house and paper mill. A corrugated containers plant is also located at the facility.

Existing Facility

The existing facility consists of the following emissions unit(s).

Facility ID No. 0890003

ID No.	Emission Unit Description
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
035	Wide-Web Flexographic Printers

Proposed Project

This is the final air construction permit which authorizes the facility to reroute the exhaust from the No. 2 Lime Bin into the enclosed bucket elevator that feeds the No. 1 Lime Bin and vents through the No. 1 Lime Bin baghouse; thereby eliminating the No. 2 Lime Bin baghouse and vent stack. The project will eliminate an emission point (i.e. the No. 2 Lime Bin baghouse vent) and decrease the potential emissions of the Lime Bin baghouse vents from 10.6 tons per year (TPY) to 5.3 TPY. This project will modify the following emissions units:

Facility ID No. 0890003	
ID No.	**Emission Unit Description**
021	No. 4 Lime Kiln

This emissions unit consists of the No. 4 Lime Kiln, the No. 1 Lime Bin (re-burned lime) and the No. 2 Lime Bin (purchased lime.) This project only concerns the Lime Bins. The project will eliminate an emission point (i.e. the No. 2 Lime Bin baghouse vent.) The potential emissions of the two lime bins are reduced due to the elimination of the No. 2 Lime Bin baghouse vent. The current potential emissions from each baghouse are 1.2 pounds pr hour and 5.3 TPY, for a total of 10.6 TPY. This project will reduce potential PM emissions from the Lime Bins to 5.3 TPY.

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 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Air Resources Section, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office. The Permitting Authority's telephone number is (904) 256-1700.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office. The mailing address and phone number of the District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Compliance Authority's telephone number is (904) 256-1700.
3. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions
   d. 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. 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.]

8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation. The permittee shall apply for a Title V air operation permit revision at any time; however at least 90 days prior to expiration of this permit, or no later than 180 days after commencing operation of the new equipment, whichever occurs first. To apply for a Title V operation permit revision, the applicant shall submit the appropriate application form, compliance test results (if required), and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting and Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

No. 4 Lime Kiln (EU 021)

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
021	No. 4 Lime Kiln with an electrostatic precipitator to control particulate matter. NCG (Non-Condensable Gases) from the Kamyr digester system, batch digester system, No. 5 Multi-Effect Evaporators system and No. 6 Multi-Effect Evaporators system are combusted in this kiln as a control of the TRS (Total Reduced Sulfur) compounds in the NCG. Low volume, high concentration (LVHC) Noncondensible gases (NCG) 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 with the No. 5 Power Boiler as the back-up for compliance with 40 CFR 63, Subpart S. No. 1 Lime Bin receives lime from the No. 4 Lime Kiln (re-burned lime) via conveyor and bucket elevator. A bag fabric filter is used to control particulate matter from the Lime Bin and the bucket elevator. No. 2 Lime Bin receives purchased lime by railcar or truck. Exhaust gases from the No. 2 Lime Bin are vented to the bucket elevator serving the No. 1 Lime Bin, and then through the No. 1 Lime Bin and bag fabric filter.

PROPOSED WORK

1) This emissions unit consists of the No. 4 Lime Kiln, the No. 1 Lime Bin (re-burned lime) and the No. 2 Lime Bin (purchased lime.) This project only concerns the Lime Bins.

   a) No. 1 and No. 2 Lime Bin Vents: The permittee will reroute the exhaust from the No. 2 Lime Bin into the enclosed bucket elevator that feeds the No. 1 Lime Bin and vents through the No. 1 Lime Bin baghouse.

   b) No. 2 Lime Bin Vent: The permittee will eliminate the No. 2 Lime Bin baghouse and vent stack and the conditions associated with the No. 2 Lime Bin baghouse and vent stack.

[Application No. 0890003-036-AC]

   c) This permit modifies conditions outlined in construction permit No. AC 45-141878 as follows:

      i) Condition 5 in construction permit AC 45-141878:

      Each baghouse control system associated with the lime storage bins (Nos. 1 & 2) shall not exhibit any VE (5% opacity) pursuant to FAC Rule 17-2.700(3)(d). Compliance shall be demonstrated using EPA Method 9 pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

      Is removed and replaced by:

      No. 1 Lime Bin Vent

      5.a. Visible Emissions. Visible Emissions shall not exceed 5% opacity. [Rule 62-297.620(4), F.A.C., Construction Permit No. AC45-141878, Construction Permit No. 0890003-036-AC]

5.b. Visible Emissions The test method for Visible Emissions shall be EPA Method 9, as incorporated in Chapter 62-297, F.A.C. A compliance test shall be conducted annually, once each federal fiscal year. [Construction Permit No. AC45-141878, Construction Permit No. 0890003-036-AC]

ii) Condition 6 in construction permit AC 45-141878:

Failure to comply with Specific Condition No. 5 will necessitate the requirement to perform a mass emissions test for PM using EPA Methods 1, 2, 3, and 5, pursuant to FAC Rule 17-2.700 and 40 CFR 60, Appendix A. PM emissions shall not exceed 0.03 gr/dscf (Lime Bin #1: 1.2 lbs/hr, 5.3 TPY; Lime Bin #2: 0.74 lb/hr, 3.2 TPY.

Is removed and replaced by:

No. 1 Lime Bin Vent

6.a.. Particulate Matter Emissions. Particulate Matter emissions shall not exceed 0.03 gr/dscf, 1.2 lbs/hr, and 5.3 TPY. [Construction Permit No. AC45-141878, Construction Permit No. 0890003-036-AC]

6.b. Particulate Matter. Compliance shall be demonstrated by compliance with visible emissions standards specified in Condition 5.a. Failure to comply with this standard shall necessitate the requirement to conduct a mass emissions compliance test for particulate matter emissions using EPA Methods 1, 2, 3, and 5 pursuant to Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A. [Construction Permit No. AC45-141878, Construction Permit No. 0890003-036-AC]