Title V Air Operation Permit Revision
Permit No. 0890003-044-AV

APPLICANT

The applicant for this project is RockTenn CP, LLC. The applicant's responsible official and mailing address are: Mr. Thomas Sweetser, Plant Manager, RockTenn CP, LLC, P.O. Box 2000, Fernandina Beach, Florida 32035.

FACILITY 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, powerhouse and paper mill. The facility also includes the onsite Boxplant, which prints and converts linerboard into corrugated containers or other finished products.

Woodyard:

The Woodyard supplies wood chips and bark to the mill from logs and purchased chips. Southern Yellow Pine is received as logs and/or chips by rail cars and/or trucks. The logs are debarked and chipped and the chips are classified through screens according to thickness. The chips are conveyed from the chip piles to the Batch and Kamyr digester systems.

Digesting Systems and Brownstock Washing Systems:

The Batch Digester System consists of (8) batch digesters, (2) Blow Tanks, and a Turpentine Recovery System. Wood chips, cooking solution consisting of caustic sodium hydroxide and sodium sulfide (known as white liquor), and Black Liquor (weak wash from 1st stage filtrate tank), are loaded into to the digesters. Each loaded digester is then placed under high temperature and pressure using steam. The cooking solution digests the wood chips and the lignin is chemically separated from the cellulose. During cooking, Noncondensible gases are vented into the Turpentine Recovery System. From the digesters, the cooked pulp and spent cooking solution (now known as black liquor) are blown to atmospheric pressure into either A-Line Blow Tank or B-Line Blow Tank. Digesters 1, 2, and 3, are blown into A-Line Blow Tank, while Digesters 5, 6, 7, and 8 are blown into the B-Line Blow Tank. Digester 3 or 4 can be blown into either blow tank. The pressure reduction helps with separation. Vent gases from the blow tanks are routed to the blow heat recovery system discussed below.

The Kamyr Digester System consists of a chip steaming tank, the Kamyr continuous digester, (2) flash tanks, the Kamyr Blow Tank, and a Turpentine Recovery System (Kamyr Cyclone, 2 Primary Condensers, Secondary Condenser, Tertiary Condenser or NCG Cooler, the Turpentine Decanter, and the East and West Turpentine Storage Tanks).

Wood chips are fed from the chip bin through a low-pressure feeder into a steaming vessel where steam (flashed from the No. 1 Flash Tank – residual liquor) preheats the chips and drives off air and Noncondensibles. The Noncondensible gases are routed to the Turpentine Recovery System. The chips then fall into a chute connected to a high-pressure feeder.

The feeder consists of a single rotating element having a series of staggered pockets. Each pocket picks up chips and white liquor is added to form chip slurry. The chip slurry is then routed to the Kamyr digester inlet. White liquor is added to the Kamyr digester to chemically separate the lignin from the cellulose. The cooked pulp moves downward through the different zones of the digester. The hot residual liquor is extracted through screens on the edges of the Kamyr and into the No. 1 Flash tank, which supplies steam to the steaming vessel. The hot spent cooking solution is displaced from the cooked pulp near the bottom of the digester with upward-flowing filtrate from the Kamyr brown stock washer system (weak wash from the 1st stage Kamyr Filtrate Tank). The cooked pulp is continuously removed by slowly rotating paddles and then blown at a controlled rate into the Kamyr Blow Tank.

From the Kamyr Blow Tank, the pulp is processed through fibrilizers to remove any knots and tailings (uncooked, woody materials). After passing through the fibrilizers, the cooked pulp is refined. Material rejected from the screening operation is returned to the Kamyr Surge Tank. The remaining pulp is screened and refined through a series of screens and refiners. The fibrilizers and screens do not vent to the atmosphere. The pulp is then pumped to the Kamyr washer sets (two identical washer sets consisting of two vacuum drum per washer set) where the pulp is washed with shower water to displace the spent cooking solution (black liquor). The washed pulp is stored in tanks for use on the paper machines. The recovered black liquor is sent to liquor storage before being sent to the multiple effect evaporators.

From the A-Line and B-Line Blow Tanks, the pulp follows a similar process of refining, screening and washing, however pulp from the A-Line Blow Tank is sent to the A-Line Brownstock Washing System, while pulp from the B-Line Blow Tank is sent to either the B-Line Brownstock Washing System or the C-Line Brownstock Washing System. The A and B-Line Brownstock Washing Systems are identical counter flow, vacuum drum washer sets consisting of four washer drums per set. Segregated evaporator condensate and white water is used as shower water on the last stage of washing. The filtrate from each drum stage flows by gravity to a filtrate tank and is used on the prior drum as shower water. The filtrate from the first stage drum is sent to the multiple effect evaporators. The C-Line Brownstock Washing System is described below.

Blow Heat Recovery:

Gases from the A-Line and B-Line Blow Tanks pass through its own cyclone to remove any entrained black liquor, which is sent back to its respective blow tank. The gases then combine and enter a primary condenser. The condensed gases are routed to the Blow Heat Accumulator where they are further condensed by recirculated mill process water. The collected condensate is routed to the Foul Condensate Collection Tank followed by treatment in the Waste Water Treatment System. The uncondensed gases from the primary condenser are routed to the secondary condenser for Turpentine Recovery. The remaining uncondensed gases are routed to the LVHC collection system and No.4 Lime Kiln or No. 5 Power Boiler for destruction.

Black Liquor and Chemical Recovery:

The recovered black liquor from the Kamyr wash line, and filtrate from the A and B Line washers, is pumped to the multiple effect evaporators (MEE) to remove the excess water and increase the black liquor solids content. During the evaporation process, a soaplike substance is collected from the black liquor by a skimmer and is pumped to the Tall Oil Plant for further processing. The mill operates two, MME systems, the Nos. 5 and 6.

The concentrated black liquor is further concentrated into strong black liquor in one of four concentrators before being burned in the Nos. 4 or 5 Recovery Boilers. The black liquor contains organics extracted from the wood and inorganic chemicals. The organics are burned as fuel in the recovery boilers to produce steam while the inorganics (sodium salts) fall to the floor of the boiler and are recovered as smelt (molten ash). The smelt is tapped from the bottom of the recovery boiler and sent to the Smelt Dissolving Tanks (Nos. 4 and 5) where it is dissolved in mill process water and weak wash from the recausticizing area. The reaction forms a mixture of sodium carbonate and sodium sulfide (green liquor).

Recausticizing and Lime Recovery:

The green liquor is pumped to the green liquor clarifier where the dregs are removed from the green liquor. The inorganics in the clarified green liquor are recovered in the slaker.

In the slaker, lime (purchased or reburned from the lime kiln) is added to the green liquor causing a reaction (causticizing), forming a sodium hydroxide and calcium carbonate mixture. The mixture is sent to the white liquor clarifiers where the calcium carbonate (lime mud) precipitates. The causticized liquor that is separated from the lime mud is now known as white liquor. This white liquor is then reused in the pulping process as the cooking liquor in the Batch Digester and Kamyr Digester Systems.

The lime mud is removed from the white liquor clarifiers and is sent to the lime mud washers. The resulting filtrate is used to dissolve the smelt in the smelt dissolving tanks. The washed lime mud is sent to a filter before being calcined in the No. 4 Lime Kiln to recover the lime for re-use in the green liquor causticizing stage at the slaker.

Paper Machines:

The washed pulp is sent to storage or onto one of the mill's two paper machines where sheets are formed by draining water from the pulp slurry over a moving wire. Additional water is removed by passing the pulp sheet over pressing and drying cylinders heated internally with steam. The pulp sheet is then transported to the finishing room where the pulp sheet is cut into smaller rolls or sheets based on customer specifications.

Secondary Fiber Pulp Plant (Recycle Plant):

Post consumer cardboard, (Old Corrugated Cardboard) is mixed with water to produce a slurry of paper fiber and water in the Hydropulper. The pulp is diluted prior to being screened and cleaned. The cleaned pulp is thickened and either stored or sent onto one of the mill's two paper machines.

Boilers:

The steam needed for mill operations is produced in the power boilers and the recovery boilers. Steam is also used to produce the mill's electricity needs. The boilers at the mill are described below.

40 CFR 63 Subpart S Applicability

This facility is subject to the requirements of 40 CFR 63 Subpart S. The facility uses the No. 4 Lime Kiln and the No. 5 Power Boiler as the control devices to meet the requirements of 40 CFR 63.443 for the Low Volume High Concentration sources.

The facility uses the UNOX biological treatment system to control HAP emissions in condensates as required in 63.446 and 63.453. All of the pulping process condensates from the 63.446 named sources are collected in a closed condensate collection system and hard piped directly to the UNOX reactor to prevent the release of HAPs to the atmosphere.

At the UNOX reactor, the collected process condensate is split between the three UNOX reactor trains and mixed with process wastewater after the wastewater enters the UNOX reactor. Biological organisms in the activated sludge in the reactor consume the HAPs in the condensate.

The UNOX oxygen feed flow and UNOX vent gas purity is continuously monitored. These parameters are used as indicators of system upsets and malfunctions that would ultimately cause a reduction in wastewater dissolved oxygen, and therefore treatment efficiency.

Because the UNOX system is different from "open" and "closed" biological systems as described in Subpart S, EPA approved an alternative method of demonstrating compliance with the Subpart standards. The facility utilizes the Condensate Compliance Plan as amended March 5, 2001.

The secondary fiber pulping operation has a maximum capacity of 500 ODTUP/Day recycle material production. There are no controls required by 40 CFR Subpart S for secondary fiber pulping operations.

The facility complies with the Clean Condensate Alternative (CCA) standards in 40 CFR 63.447 as an alternative to compliance with the 40 CFR 63.443 standards for the High Volume Low Concentration (HVLC) sources specified within the Subpart. The CCA option requires Kraft mills to reduce HAP emissions from affected sources by an amount greater than or equal to the emission reductions achieved by the collection and treatment of HAP emissions from HVLC sources included in Phase II of the Subpart. Emission reductions are calculated by comparing HAP emissions from affected sources under CCA with HAP emissions under a baseline condition as defined in the Subpart.

In the EPA CCA guidance document dated April 8, 2004, it was indicated that wastewater treatment plants are "affected" sources under the CCA. The mill's CCA is the replacement of the direct-contact, wastewater treatment cooling tower with a non-contact heat exchanger system. Four sets of plate and frame heat exchangers, designed to handle the mill's wastewater flow, were installed. The existing wastewater cooling tower was modified to recirculate non-contact cooling water through the heat exchangers to provide the necessary cooling of the effluent. The removal of process effluents from the cooling tower results in the elimination of total HAP emissions from this source.

COMPARISON OF METHANOL EMISSIONS AND EMISSION REDUCTIONS OF HVLC AND CCA

	Methanol Emissions (lb/ODTP)			**Reductions (lb/ODTP)**	
	Baseline	HVLC Control	CCA Project	HVLC Control	CCA Project
BSW Systems [a]	0.28	0.006[b]	0.28	0.274[b]	---
Cooling Tower	0.76	0.76	0	---	0.76
UNOX Reactor Vents	0.000014	0.000014	0.0000012	---	0[c]
Secondary Clarifiers	0.0027	0.0027	0.0004	---	0[c]
Total	1.043	0.769	0.28	**0.274**	**0.76**

[a] The mill's HVLC sources are the Kamyr Line Brownstock Washers (two identical vacuum drum BSWs), Batch A & B line BSWs (two identical drum BSWs), C-Line BSW (two stage combination drum/diffusion BSW). Methanol emissions from testing conducted October 4-5, 2005.

[b] 98% control required under 40 CFR 63.443. Emissions =0.02 x 0.28 = 0.006 lb/ODTP. Emission reductions =0.28 – 0.006= 0.274 lb/ODTP

[c] The 15 day Initial Performance Test (IPT) on the CCA system on conducted on December 5, 2006 demonstrated that the methanol emissions did not increase as could have been expected from the increased methanol loading caused by removing the WWT cooling tower. Therefore the reductions in methanol emissions for the CCA project are conservatively assumed to be 0 lb/ODTP.

40 CFR 63.453 requires that a CMS be installed and operated to ensure compliance with the CCA. The mill maintains the manual wastewater bypass valve in the closed position. It is secured with a lock-tie device and tag. Documentation of valve movement is used to establish that process wastewater does not pass through the wastewater cooling tower. The mill also uses the UNOX reactor operating parameters of oxygen feed rate and average vent gas purity (same as 63.466 continuous compliance parameters).

40 CFR 63 Subpart KK Applicability

In accordance with the applicability of the subpart, specifically 63.820(a)(1) an existing facility that is a major source of hazardous air pollutants (HAP) at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated are subject to the subpart.

The corrugated box plant is co-located with the mill (a major source of HAP). The box plant operates a wide-web (18 inches or more in width) flexographic printing operation.

In accordance with 63.821(b), each product and packaging rotogravure or wide-web flexographic printing affected source at a facility that is a major source of HAP, as defined in 40 CFR 63.2, that complies with specific criteria on and after the applicable compliance date of the subpart is subject only to the usage and initial notification requirements of the Subpart.

The mill elected to comply with the specific criteria of the Subpart, which is stated within the Title V Permit.

40 CFR 63 Subpart MM Applicability

The No.4 Recovery Boiler, No. 5 Recovery Boiler, No. 4 Smelt Dissolving Tank, No. 5 Smelt Dissolving Tank, and the No. 4 Lime Kiln are subject to the requirements of 40 CFR 63 Subpart MM - Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi chemical Pulp Mills.

Emissions Units Descriptions

No. 5 Power Boiler (Emissions Unit No. 006):

Particulate matter emissions, including the fly ash, are controlled by a multiple cyclone (without fly ash reinjection), followed by an electrostatic precipitator. The multiple cyclone is manufactured by Barron Industries, contains 64 tubes in the assembly, and has an estimated control efficiency of 75%.

The electrostatic precipitator is a single chamber, 3-field, ESP manufactured by Research Cottrell. The estimated control efficiency is 94%.

The total maximum operational heat input of this emissions unit is 805 MMBtu/hr. This emissions unit may burn carbonaceous fuel and No. 6 fuel oil in any combination or 100% No. 6 fuel oil. The No. 6 fuel oil may contain on-specification used oil. No. 2 fuel oil may also be fired in any combination with other permitted fuels or 100% No. 2 fuel oil. Wastewater wood fiber residuals collected from the wastewater treatment system (primary and secondary clarifiers), via the sludge press are also burned in this boiler as a fuel source.

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 this boiler as the backup control device to the No. 4 Lime Kiln for compliance with 40 CFR 63, Subpart S.

The permitting of this boiler was completed as a part of the C-Line BSW and the No. 8 Batch Digester System (Construction Permit Nos. AC45-190382 and AC45-190383). The No. 5 Power Boiler had not been permitted up to that point in time. It was considered to be an existing source and it was determined that a modification or reconstruction had not occurred, therefore, it was not subject to a NSPS requirement.

This emissions unit is subject to CAM requirements, Rule 296.410, F.A.C. –Carbonaceous Fuel Burning Equipment; Rule 62-296.404, F.A.C. – Kraft Pulp Mills; Rule 62-296.405, F.A.C. – Fossil Fuel Steam Generators with More Than 250 Million Btu Per Hour Heat Input; 40 CFR 61 Subpart E-National Emission Standard for Mercury; and 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The compliance date for 40 CFR 63, Subpart DDDDD is Janaury 31, 2016.

No. 4 Recovery Boiler (Emissions Unit No. 007):

This recovery boiler is an 852 MMBtu/hr heat input boiler designed to burn a maximum of 137,500 pounds per hour of black liquor solids. This emissions unit shall be fired with Black Liquor Solids (with or without HCE addition) and/or No. 6 fuel oil. The No. 6 fuel oil may contain on-spec used oil provided the on-spec used oil meets the requirements of Subsection L. The maximum sulfur content in the No. 6 fuel oil, prior to any blending with on-spec used oil, shall not exceed 2.5% by weight. The No. 6 fuel oil may be fired during periods of startup, shutdown and malfunction. If the No. 6 fuel oil contains on-spec used oil, the on-spec used oil must meet the requirements of Condition L.2.1. in order to be fired during periods of startup, shutdown or malfunction. This emissions unit may also be fired with a mixture of virgin ultra low sulfur fuel (No. 2 fuel oil) with black liquor such that up to one (1) gallon per minute with a maximum sulfur content of 15 parts per million (0.0015 percent) of the virgin ultra low sulfur No. 2 fuel oil is fired in the mixture with black liquor solids. The total virgin ultra low sulfur No. 2 fuel oil usage shall be offset by a reduction of two (2) gallons of BLS at 66% solid solution from the maximum permitted input for each one (1) gallon of No. 2 fuel oil used. The virgin ultra low sulfur diesel fuel shall be pumped into the black liquor lines directly from tanker trucks. Adequate spill protection shall be in place at all times around the tanker trucks and connection system to the black liquor lines . The No. 2 fuel oil may be fired during periods of startup, shutdown and malfunction. An electrostatic precipitator manufactured by

Environmental Elements is used to control particulate emissions with a design efficiency of 99%. TRS emissions are monitored with a CEM system. A COMS is also operated as a requirement of 40 CFR 63 Subpart MM. This emissions unit is regulated under Rule 62-296.404, F.A.C., Kraft Pulp Mills, and 40 CFR 63, Subpart MM.

No. 5 Recovery Boiler (Emissions Unit No. 011):

This recovery boiler is a 972 MMBtu/hr heat input boiler designed to burn a maximum of 156,780 pounds per hour of black liquor solids. This emissions unit shall be fired with Black Liquor Solids (with or without HCE addition) and/or No. 6 fuel oil. The No. 6 fuel oil may contain on-spec used oil provided the on-spec used oil meets the requirements of Subsection L. The maximum sulfur content in the No. 6 fuel oil, prior to any blending with on-spec used oil, shall not exceed 2.5% by weight. The No. 6 fuel oil may be fired during periods of startup, shutdown and malfunction. If the No. 6 fuel oil contains on-spec used oil, the on-spec used oil must meet the requirements of Condition L.2.1. in order to be fired during periods of startup, shutdown or malfunction. This emissions unit may also be fired with a mixture of virgin ultra low sulfur fuel (No. 2 fuel oil) with black liquor such that up to one (1) gallon per minute with a maximum sulfur content of 15 parts per million (0.0015 percent) of the virgin ultra low sulfur No. 2 fuel oil is fired in the mixture with black liquor solids. The total virgin ultra low sulfur No. 2 fuel oil usage shall be offset by a reduction of two (2) gallons of BLS at 66% solid solution from the maximum permitted input for each one (1) gallon of No. 2 fuel oil used. The virgin ultra low sulfur diesel fuel shall be pumped into the black liquor lines directly from tanker trucks. Adequate spill protection shall be in place at all times around the tanker trucks and connection system to the black liquor lines . The No. 2 fuel oil may be fired during periods of startup, shutdown and malfunction. An electrostatic precipitator manufactured by Environmental Elements is used to control particulate emissions with a design efficiency of 99%. TRS emissions are monitored with a CEM system. A COMS is also operated as a requirement of 40 CFR 63 Subpart MM. This emissions unit is regulated under Rule 62-296.404, F.A.C., Kraft Pulp Mills, 40 CFR 52.21(d)(2)(ii), 40 CFR 60, Subpart BB- Standards of Performance for Kraft Pulp Mills, and 40 CFR 63, Subpart MM.

No. 4 Smelt Dissolving Tank (Emissions Unit No. 013):

This emissions unit receives molten smelt from the No. 4 Recovery Boiler. The smelt is dissolved in weak wash to yield green liquor for the slaking process. A Venturi scrubber manufactured by Air Pollution, Inc. controls particulate emissions. The control efficiency is estimated at 93%. Scrubber liquid (weak wash- caustic) flow rate is monitored pursuant to Rule 62-296.404, F.A.C. The scrubber liquid recirculation rate and the pressure drop across the scrubber are required to be monitored pursuant to the requirements of 40 CFR 63 Subpart MM. The maximum operating rate of this unit is 137,500 pounds per hour of black liquor solids being fired on the No. 4 Recovery Boiler. This emissions unit is regulated under Rule 62-296.404, F.A.C., Kraft Pulp Mills, CAM for TRS, and 40 CFR 63, Subpart MM.

No. 5 Smelt Dissolving Tank (Emissions Unit No. 014):

This emissions unit receives molten smelt from the No. 5 Recovery Boiler. The smelt is dissolved in weak wash to yield green liquor for the slaking process. The control efficiency is estimated at 93%. A Venturi scrubber manufactured by Air Pollution, Inc., controls particulate emissions. The scrubber liquid (weak wash – caustic) is monitored pursuant to Rule 62-296.404, F.A.C., while the recirculation rate and the pressure drop across the scrubber are monitored pursuant to the standards of 40 CFR 63 Subpart MM. The pressure drop across the scrubber is required to be monitored pursuant to the standards of 40 CFR 60 Subpart BB as well as the scrubbing liquid supply pressure. The maximum operating rate of this unit is 156,780 pounds per hour of black liquor solids being fired on the No. 5 Recovery Boiler. This emissions unit is regulated under Rule 62-296.404, F.A.C., Kraft Pulp Mills, 40 CFR 60, Subpart BB, 40 CFR 52.21(d)(2)(ii), CAM for TRS, and 40 CFR 63, Subpart MM.

No. 7 Power Boiler (Emissions Unit No. 015):

This emissions unit is fired primarily with coal. Nos. 2 and 6 Fuel Oil, and natural gas may be fired during startup, shutdown, and malfunction, and at other times as needed for flame stabilization and to maintain steam production. This revision incorporates the provision to fire natural gas as authorized by air construction permit no. 0890003-034-AC. Rated capacity is 1021 MMBtu/hr heat input. A two-chamber, 6-field each chamber, electrostatic precipitator manufactured by Hamon Research-Cottrell, is used to control particulate emissions. The design efficiency is 98%.

This emissions unit is regulated under Rule 212.400(5), F.A.C., Prevention of Significant Deterioration (PSD) Permit No. PSD-FL-062, Rule 62-296.405, F.A.C., Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination, dated October 11, 1980 and amended in 1984, CAM for particulate matter, 40 CFR Part 60 Subpart D Fossil Fuel Fired Steam Generators, and 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The compliance date for 40 CFR 63, Subpart DDDDD is January 31, 2016.

The following emissions point is permitted under this emissions unit:

The Ash Handling System (EP02) is regulated under Rule 212.400(5), F.A.C., Prevention of Significant Deterioration (PSD): Permit(s) No(s). PSD-FL-062.

Tall Oil Plant (Emissions Unit No. 020):

A Packed-Gas Adsorption Column manufactured by Air Pollution, Inc. controls Total Reduced Sulfur (TRS) emissions from the acidulator, the lignin tank and the saltcake tank at the Tall Oil Plant. The scrubber system uses a solution of caustic soda, at an average pH of 12 pH units, as the absorbing medium. The efficiency of the scrubber is 90%. This emissions unit is regulated under Rule 62-296.404, F.A.C. – Kraft Pulp Mills.

No. 4 Lime Kiln (Emissions Unit No. 021):

This unit is fired primarily with No. 6 fuel oil (maximum of 2.5% sulfur by weight), which may contain on-spec used oil, at a firing rate of 170.63 MMBtu per hour heat input, or natural gas with a firing rate of 190 MMBtu per hour. This revision incorporates the provision to fire natural gas as authorized by air construction permit no. 0890003-034-AC. Liquefied Petroleum Gas (LPG) is fired during startups only.

The maximum lime production rate is 26.25 tons per hour. An electrostatic precipitator, manufactured by Research Cottrell, controls particulate matter emissions. The estimated control efficiency is 99%. Sulfur dioxide emissions are also controlled by the sulfur content of the fuel oil (maximum of 2.5% by weight). The kiln also serves as the primary control device for the non-condensable gas (NCG) system. TRS emissions compliance is maintained by proper combustion and is monitored with a CEM system.

This emissions unit is regulated under Rule 62-296.404, F.A.C., Kraft Pulp Mills, 40 CFR 60, Subpart BB, and 40 CFR 63, Subpart MM.

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. The baghouse was originally installed in 2002 and consists of 49 bags with a collecting area of 524 sq-ft. The baghouse operates with a 3-6 inches of H_2O pressure differential across the unit. An Air Pressure Pulse Jet system is used for bag cleaning

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.

C-Line Brownstock Washing System (Emissions Unit No. 024):

The C-Line BSWS is a two-stage, combination rotary drum vacuum/diffusion washer. It consists of the C-Line 1st and 2nd Stage Filtrate Tanks, 2nd Stage Pressure Diffusion Washer, and C-Line 1st Stage Vacuum Washer. The filtrate from the diffusion washer is used as washwater for the rotary drum vacuum washer. The filtrate from the drum washer is sent to the multiple effect evaporators. The diffusion washer uses condensate and whitewater for washing. Gases from these sources are vented to the C-Line Turpentine extraction tower then to the C-Line packed gas adsorption wet scrubber to control TRS (Total Reduced Sulfur) emissions. The gas adsorption column is manufactured by Tristate Contractors and utilizes a sodium hypochlorite solution as the scrubbing media. Control efficiency is estimated to be 90%. This emissions unit is a part of the total Brownstock Washing System (Batch A-Line and B-Line; and Kamyr Line) at the facility.

The C-Line washer processes less than 10% of the batch pulp and less than 3% of the total pulp produced at the mill on an annual basis. This emissions unit is regulated under 40 CFR 60,

Subpart BB, Standards of Performance for Kraft Pulp Mills, and Rule 62-212.400(5), F.A.C., Prevention of Significant Deterioration (PSD): Permit No. PSD-FL-165.

The scrubber is manufactured by Tristate Contractors, and uses a sodium hypochlorite solution as the scrubbing medium. The average pH of the solution is 10 s.u. The inlet gas flow rate is approximately 7,200 acfm, inlet gas temperature of 100°F, inlet loading of 50 ppmvd of TRS, and a 0.03 inches H2O pressure differential across the scrubber.

Pulping System – MACT I (Emissions Unit No. 033):

Noncondensible gases (NCG) from the batch digester system, continuous digester system (Kamyr), Nos. 5 and 6 Evaporator systems are collected and combusted in the No. 4 Lime Kiln. Low volume, high concentration (LVHC) non-condensable gas from the turpentine decanter, weir box, and turpentine storage tank, Kamyr blow tank, and the foul condensate collection tank are also collected and combusted in the No. 4 Lime Kiln. The No. 5 Power Boiler is the backup device for compliance with 40 CFR 63 Subpart S.

Pulping process condensates from the batch digester system, the continuous digester system (Kamyr), Nos. 5 and 6 Evaporator systems, the turpentine recovery system, and the LVHC collection system, are collected in a closed condensate collection system and hard piped directly to the UNOX reactor to prevent the release of HAPs to the atmosphere followed by secondary treatment. Biological organisms in the activated sludge in the reactor consume the HAPs in the condensate.

High Volume, Low Concentration (HVLC) NCGs from Kamyr Line BSWs (two identical vacuum drum BSWs), Batch A & B Line BSW (two identical 4-stage drum BSWs), and C-Line BSW (2-stage combination drum/diffusion BSW), are also included in this emissions unit. The facility complies with the Clean Condensate Alternative (CCA) standards in 40 CFR 63.447 as an alternative to compliance with the 40 CFR 63.443 standards for the High Volume Low Concentration (HVLC) sources specified within the Subpart.

John Deere 210 BHP Diesel Engine (Emissions Unit No. 038):

The engine is an existing Emergency Stationary Reciprocating Internal Combustion Engine (RICE) and is used to pump water for fire suppression. The engine is subject to 40 CFR 63 Subpart ZZZZ- National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. The engine is a four-stroke cycle, turbocharged, in-line, 6-cylinder, lean burn, compression ignition, diesel engine with a total displacement of 6.8 liters. It is used for fire suppression. The year of Manufacture is 2004. The engine was placed in service in 2005.

Caterpillar 292 BHP Diesel Engine (Emissions Unit No. 039):

The engine is an existing Emergency Stationary Reciprocating Internal Combustion Engine (RICE) and is used to pump water for fire suppression. The engine is subject to 40 CFR 63 Subpart ZZZZ- National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. The engine is a four-stroke cycle, turbocharged, in-line, 6-cylinder, compression ignition, diesel engine with a total displacement of 14.6 liters. It is used for fire suppression. The engine was placed in service 11/16/1998.

Caterpillar 292 BHP Diesel Engine (Emissions Unit No. 040):

The engine is an existing Emergency Stationary Reciprocating Internal Combustion Engine (RICE) and is used to pump water for fire suppression. The engine is subject to 40 CFR 63 Subpart ZZZZ- National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. The engine is a four-stroke cycle, turbocharged, in-line, 6-cylinder, compression ignition, diesel engine with a total displacement of 14.6 liters. It is used for fire suppression. The engine was placed in service 11/16/1998.

Coal Handling System (Emissions Unit No. 041):

The coal handling system consists of the unloading area, storage area, preparation facility, and conveyor system. The coal crushing device is a American Pulverizer, Model ACC-3A, two-stage, three-roll crusher rated at a capacity of 400 tons per hour (TPH). The unit is completely enclosed and is fed coal through an in-feed chute. Coal is conveyed to the crusher tower, where the coal drops into a chute and onto a vibrating feeder before entering the coal crushing device. The vibrating feeder is mostly enclosed while the area around the coal crushing device is totally enclosed. After exiting the coal crushing device, the coal drops onto the silos conveyor and the coal is conveyed to the two silos.

The Coal Handling System is regulated under Rule 62-212.400(5), F.A.C., Prevention of Significant Deterioration (PSD): Permit No. PSD-FL-062 and 40 CFR 60 Subpart Y – Standards of Performance for Coal Preparation Plants.

John Deere 125 BHP Diesel Engine (Emissions Unit No. 042):

The engine is an existing Emergency Stationary Reciprocating Internal Combustion Engine (RICE) and is used to maintain a slow roll for the kiln in the event of a failure or shutdown of the main kiln drive to avoid damage to the kiln and solidification of the lime mud in the kiln. The engine is subject to 40 CFR 63 Subpart ZZZZ- National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. The engine is a turbocharged, in-line, 6-cylinder, compression ignition, diesel engine with a total displacement of 7.64 liters. The engine was manufactured in 1989.

Wisconsin 65 BHP Gasoline Engine (Emissions Unit No. 043):

The engine is an existing Emergency Stationary Reciprocating Internal Combustion Engine (RICE) and is used to maintain agitation in the lime mud tanks to avoid solidification in event of a power loss or other failure of the agitator electrical drive. The engine is subject to 40 CFR 63 Subpart ZZZZ- National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. The engine is a four-stroke cycle, 4-cylinder, spark ignition, gasoline engine with a total displacement of 2.9 liters. The engine was manufactured in 1989.

Unregulated/Insignificant Emissions Units and/or Activities:

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received March 26, 2014

Application for a Title V Operation Permit Revision received April 10, 2014

Additional Information received May 28, 2014

Additional Information received June 6, 2014

Comments on Draft/Proposed permit received from applicant on June 23, 2014

Comments on Draft/Proposed permit received from applicant on June 25, 2014

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C. The facility is one of the 28 categories listed in Rule 62-210.200 (195), F.A.C. - secondary metal production plants, and has the potential to emit more than 100 tons per year of PSD pollutant (VOC).

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Emissions Units 006 (No. 5 Power Boiler), 013 (No. 4 Smelt Dissolving Tank), 014 (No. 5 Smelt Dissolving Tank), and 015 (No. 7 Power Boiler) are each subject to CAM.

GHG: Based on the Greenhouse Gases Emissions Report for year 2010, the facility total CO_2e emissions (excluding biogenic CO_2) were 784,071 thousand metric tons. The facility has the potential to emit greater than 100,000 TPY of CO_2e emissions, and is therefore a major source of Greenhouse Gases based on EPA's 2010 Gas Tailoring Rule.

PROJECT REVIEW

This permit is being issued for the purpose of revising Title V Air Operation Permit No.: 0890003-038-AV by incorporating the terms and conditions of air construction permit No. 0890003-040-AC. The air construction permit No. 0890003-040-AC authorized the replacement of the existing 400 TPH coal crusher at the Coal Handling System with a unit of the same size and also included minor changes to the dust suppression system requirements applicable to the Coal Handling System.

Air Construction Permit No. 0890003-043-AC is being co-processed with and incorporated in this Title V Revision as well. This construction permit modifies Permit No. 0890003-040-AC for Emissions Unit 041, Coal Bunkers A, B, and C. These bunkers were identified in Permit No. 0890003-040-AC as individual emission points, Nos. 09, 10, and 11. The facility has since determined that these bunkers are enclosed and all vent to a

common stack. A single emission point is identified for the common stack, EP 09, and Emission Points 10, and 11 have been eliminated in this construction permit.

The Department issued a Draft Air Construction Permit (draft permit) and Draft/Proposed Title V Permit Revision package for these projects on April 8, 2014. Subsequent to its issuance, the applicant submitted an amendment to the Title V Revision/Construction Permit applications for the coal crusher replacement that was received by the Department on April 10, 2014.

The amendment application included a request for a Title V Air Operation Permit Revision to:

- Incorporation of two additional reciprocating internal combustion engines
- Installation of NO_x CEMS on the No. 7 Power Boiler and removal of maximum O_2 set point (Title V Permit Condition F.20.)

The amendment application also included a request for modification of previously issued Air Permit Nos. PSD-FL-062, and 0890003-034-AC to remove the No. 7 Power Boiler maximum oxygen set point requirement from these underlying air construction permits.

The Department, through its permitting authority, is issuing both Title V Operation Permit Revision projects under Permit No. 0890003-044-AV.

On May 29, 2014, it was requested that EU 037- Box Plant Package Boiler be re-incorporated into Appendix U-1 of the Title V Permit. The emissions unit was listed on Appendix U-1 in Permit No. 0890003-023-AV but was removed in Permit No. 0890003-031-AV based on received correspondence stating that it was dismantled on October 17, 2007.

RockTenn states that this was an error. The emissions unit removed from service on October 17, 2007 was EU 034- Mill Package Boiler with low NOx burners not EU 037.

The maximum heat input rate of the boiler is rated at 20.4 MMBtu/hour. The boiler will be used at the Box Plant during annual maintenance outages. The boiler shall meet the temporary boiler exemption of 40 CFR 60.40c(i), and therefore is not subject to NSPS, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

The boiler shall meet the temporary boiler exemption of 40 CFR 63.7491(j), and therefore is not subject to NESHAP, Subpart DDDDD- National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

The boiler is also eligible for exemption from the requirement of SIP Air Construction Permit and Rule 62-296.406, F.A.C. – Standards for Fossil Fuel Steam Generators with Less than 250 Million BTU per Hour Heat Input, New and Existing Emissions Units, by meeting the categorical exemption criteria of Rule 62-210.300(3)(a) 34., F.A.C. The exemption criteria requires the annual fuel consumption of the boiler shall be less than 290,000 gallons of fuel oil per year with a sulfur content not to exceed 0.5 percent, by weight.

Based on the fuel usage and sulfur content exemption criteria as described above, the boiler has the potential to emit more than 5 tons/year of a regulated pollutant and therefore will be classified as an unregulated emissions unit in the Title V Air Operation Permit.

Revision to Condition F. 7. - Emissions Unit 015 – No. 7 Power Boiler:

The previous versions of the Title V Operation Permit included a permitting note in Condition F.7.b. to acknowledge that the No. 7 Power Boiler is subject to the NSPS Subpart D standard in 40 CFR 60.44(a)(3) for NOx emissions, but this standard is less stringent than the standard established by the BACT Determination.

Because the Subpart D standard is an applicable standard, the permitting note has been removed from Condition F.7.b. and a separate condition has been added that states the 40 CFR 60.44(a)(3) standard.

A permitting note has been added to this new condition and also under the Nitrogen Oxides – Combination of Fuels Condition to clarify that the BACT standard is to be used when determining the NSPS NOx emissions standard when a combination of fuels are simultaneously fired in the No. 7 Power Boiler.

Title V Operation Permit Documents:

This permit revision also includes and updated Subsections A. and J. due to the September 11, 2012 EPA Amendments to 40 CFR 63 Subpart S, and updated Appendices NESHAP Part 61, Subpart A – General Provisions, NESHAP Part 63, Subpart A – General Provisions, NESHAP Part 63, Subpart S, Table 1 of Subpart S, NESHAP, Subpart DDDDD, NSPS Part 60 Subpart D, NSPS Part 60 Appendix F Procedure 1, and NSPS Part 60, Subpart A – General Provisions due to EPA promulgated amendments to these subparts.

Appendix RR- Facility-wide Reporting Requirements is updated, the Annual Operation Report and Annual Emissions Fee Form and Fee Facility-Wide Conditions are revised to reflect the changes to the statutes that went into effect for this year, and the Prevention of Accidental Releases Facility-wide condition is revised to reflect the correct reporting agency.

In order to provide better customer service and enhance the permitting experience, only those emission unit(s) (EUs) and activities identified within the scope of the permit application and those affected by any federal regulation amendments identified above appear in the EMISSIONS UNITS AND SPECIFIC CONDITIONS, and Appendices of this Draft/Proposed Title V Operation Permit.

TITLE V PERMIT FORMAT CHANGES:

- Appendix RR- Facility-wide Reporting Requirements is updated
- Appendix NSPS, Subpart A – General Provisions is updated
- Appendix NESHAP, Part 61 Subpart A – General Provisions is updated
- Appendix NESHAP, Part 63 Subpart A- General Provisions is updated
- Appendix NESHAP, Part 63 Subpart DDDDD is updated
- Appendix NSPS, Part 60 Subpart D is updated
- Appendix NESHAP, Part 63 Subpart S is updated
- Table 1 of 40 CFR 63 Subpart S is updated
- NSPS Part 60 Appendix F Procedure 1 is updated
- The Annual Operation Report and Annual Emissions Fee Form and Fee Facility-Wide conditions are replaced as follows:

FW8. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set

forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013); and Rule 2.301, JEPB; Rule 2.501, JEPB]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

- The Prevention of Accidental Releases (Section 112(r) of CAA) Facility-Wide Condition is replaced as follows:

FW10. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: https://cdx.epa.gov. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: http://www.epa.gov/osweroe1/content/rmp/index.htm. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

COMMENTS FROM APPLICANT

On June 23, 2014, comments from the applicant were received concerning the draft/proposed permit prior to publication of the Public Notice. Based on these comments, the following changes were made to the draft/proposed Title V Permit Revision:

1. Authorized Representative: Please update to Thomas Sweetser.

   Response: The permit documents have been updated to reflect Mr. Thomas Sweetser as the Responsible Official for the facility.

2. Pg. 20 of 116. Condition F.7.c. <u>Nitrogen Oxides – Solid Fossil Fuel or Solid Fossil Fuel and Wood Residue</u>. This condition is confusing since it is in conflict with Condition F.7.b. It is therefore requested that the condition be removed.

Response: The No. 7 Power Boiler is subject to the 0.6 lb/MMBtu of heat input derived from solid fossil fuel or solid fossil fuel and wood residue limitation established in the BACT Determination issued on October 11, 1984 as well as the 0.7 lb/MMBtu of heat input derived from solid fossil fuel or solid fossil fuel and wood residue standard established in 40 CFR 60.44a(3). As such, these limitations are stated in Permit Condition Nos. F.7.b. and F.7.c., respectively.

The following language is being added as clarification:

F.7.b Nitrogen Oxides – Solid Fossil Fuel or Solid Fossil Fuel and Wood Residue- BACT Determination. Nitrogen Oxides Emissions, expressed as NO_2, shall not exceed 0.6 lb per MMBTU of heat input, 612.60 lbs/hr and 2683.19 TPY, derived from solid fossil fuel or solid fossil fuel and wood residue.

{Permitting Note: This standard is more stringent than that imposed by the NSPS, 40 CFR 60.44(a)(3), which is stated below in Condition F.7.c.}

[BACT Determination dated October 11, 1984; Construction Permit No. AC45-35532]

F.7.c. Nitrogen Oxides – Solid Fossil Fuel or Solid Fossil Fuel and Wood Residue- NSPS. Nitrogen Oxides Emissions, expressed as NO_2, shall not exceed 0.7 lb per MMBTU of heat input derived from solid fossil fuel or solid fossil fuel and wood residue.

[Rule 62-204.800(8)(b)1., F.A.C.; 40 CFR 60.44(a)(3)]

3. Condition F.7.e. Nitrogen Oxides – Combination of Fuels. To be consistent with the permitting notes and the use of 0.6 lbs/MMBTU, the prorated formula needs to be changed as follows. We also recommend using the limits in lb/MMBtu as opposed to ng/J:

Response: Condition F.7.e. is revised as requested.

4. Pg. 22 of 116. Condition F.15.c. RockTenn will utilize a CO_2 monitor as the diluent gas for the NOx CEMS. Although RockTenn maintains an O_2 monitor on the boiler, it is not for the purpose of emission measurement, as noted in previous permitting efforts. It is used to set and monitor the O_2 set points (see Conditions F.20 and F.22). It is therefore requested that this condition be changed to require CO_2 monitoring.

   Response: Condition F.15.c. is revised as requested.

5. Condition F.16. Performance Evaluations and Calibration Checks. Paragraph F.16(3)(i) and (ii), and F.16(4), should all reference this Condition F.16. Also, references to SO_2 can be removed.

   Response: Condition F.16.(3)(i) and (ii), and F.16.(4) are revised as requested.

6. Pg. 23 of 116. Condition F.17. CEMS Conversion Procedures. This condition should reflect 40 CFR 60.45(e)(2), when a CEMS for measuring CO_2 is selected.

   Response: Condition F.17. is revised as requested.

7. Condition F.18. References and values related to SO_2 can be removed from this condition.

   Response: Condition F.18. is revised as requested.

8. Pg. 29 of 116. Condition F.26. As allowed by 40 CFR 60 Subpart D, 60.46(d)(5), it is requested that the alternative methods for the performance evaluations of NO_X continuous monitoring systems be allowed. Therefore, it is requested that paragraph F.26(5) not be deleted from the permit. These alternative methods are appropriately referenced in Condition F.16(1).

   Response: Condition F.26.(5) is revised as requested.

COMMENTS FROM APPLICANT

On June 25, 2014, additional comments from the applicant were received concerning the draft/proposed permit prior to publication of the Public Notice. Based on these comments, the following changes were made to the draft/proposed Title V Permit Revision:

1. Pg. 21 of 116: Condition F.7.e. We have noticed that "y" should be defined as liquid fossil fuel and wood residue to be consistent with the wording in F.7.a. as follows:

   y = is the percentage of total heat input derived from liquid fossil fuel or Liquid Fossil Fuel and Wood Residue or Gaseous Fossil Fuel and Wood Residue; and

   Response: "y" in Condition F.7.e. is revised as follows:

   y = is the percentage of total heat input derived from liquid fossil fuel (or liquid fossil fuel and wood residue or gaseous fossil fuel and wood residue); and,

2. Pg. 21 of 116: Condition F.7.e. We have noticed that "z" should be defined as liquid fossil fuel and wood residue to be consistent with the wording in F.7.b. as follows:

   z = is the percentage of total heat input derived from solid fossil fuel or Solid Fossil Fuel and Wood Residue

   Response: "z" in Condition F.7.e. is revised as follows:

   z = is the percentage of total heat input derived from solid fossil fuel (or Solid Fossil Fuel and Wood Residue, except lignite).

[1] Applicable when the boiler is fired with gaseous fossil fuel and/or liquid fossil fuel and/or solid fossil fuel (except lignite) during times other than startup, shutdown, or malfunction.

3. Pg. 29 of 116: Condition F.25. Since paragraphs (1) and (2) have been removed, paragraph (3) should be renumbered as (1).

Response: Condition F.25. is written as follows:

F.25. Nitrogen Oxides. When combinations of fossil fuels or fossil fuel and wood residue are fired, the owner or operator (in order to compute the prorated standard as shown in 40 CFR 60.43(b) and Condition

F.7.e. (40 CFR 60.44(b)) shall determine the percentage (w, x, y, or z) of the total heat input derived from each type of fuel as follows:

(i) The heat input rate of each fuel shall be determined by multiplying the gross calorific value of each fuel fired by the rate of each fuel burned.

(ii) ASTM Methods D2015, or D5865 (solid fuels), D240 (liquid fuels), or D1826 (gaseous fuels) (all of these methods are incorporated by reference, see 40 CFR 60.17) shall be used to determine the gross calorific values of the fuels. The method used to determine the calorific value of wood residue must be approved by the Administrator.

(iii) Suitable methods shall be used to determine the rate of each fuel burned during each test period, and a material balance over the steam generating system shall be used to confirm the rate.

[40 CFR 60.46(c), Permit No. 0890003-034-AC]

4. Appendix U-1. The rental package boiler is listed as:

EU 037 - 20.4 MMBtu/hour fuel oil fired package boiler (only those units meeting the Categorical Exemption criteria in Rule 62-210.300 (3)(a)34., F.A.C., and not subject to 40 CFR 60 Subpart Dc and 40 CFR 63 Subpart DDDDD)[1]

In order to avoid any future confusion, we request that the wording be modified to:

EU 037 - 20.4 MMBtu/hour fuel oil fired rental package boiler (only those units meeting the Categorical Exemption criteria in Rule 62-210.300 (3)(a)34., F.A.C., and not subject to 40 CFR 60 Subpart Dc and 40 CFR 63 Subpart DDDDD)[1]

Response: Appendix U is revised as requested.

CONCLUSION

This project revises Title V air operation permit No. 0890003-038-AV, which was issued on July 29, 2013. This revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.