



**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**APPLICANT**

Rayonier Performance Fibers, LLC  
PO Box 2002  
Fernandina Beach, Florida 32035

Fernandina Beach Mill  
ARMS Facility ID No. 0890004  
Foot of Gum Street  
Fernandina Beach, FL 32034

**PROJECT**

Project No. 0890004-040-AC  
No. 6 Power Boiler Heat input increase

**COUNTY**

Nassau, Florida

**PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Northeast District Office  
Waste and Air Resource Management Program  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

**Revised: July 9, 2013**

## **1. GENERAL PROJECT INFORMATION**

### **Air Pollution Regulations**

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters:

**Table 1 - Applicable Rules from the F.A.C.**

<b>Chapter</b>	<b>Description</b>
62-4	Permits
62-204	Air Pollution Control – General Provisions
62-210	Stationary Sources of Air Pollution – General Requirements
62-212	Stationary Sources – Preconstruction Review
62-213	Operation Permits for Major Sources (Title V) of Air Pollution
62-296	Stationary Sources – Emission Standards
62-297	Stationary Sources – Emissions Monitoring

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial activities. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories.

Federal regulations adopted by reference are given in Rule 62-204.800, F.A.C. State regulations approved by EPA are given in 40 CFR 52, Subpart K – Florida, also known as the State Implementation Plan (SIP) for Florida.

### **Glossary of Common Terms**

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

### **Facility Process Description and Location**

Rayonier is an acid sulfite based pulp mill using ammonia as a base chemical for the manufacture of dissolving pulps (SIC No. 2611). The facility is located in Fernandina Beach at the Foot of Gum Street in Nassau County, Florida 32305. The UTM coordinates are zone 14, 454.7 km East, and 3392.2 km North. This site is an area that is in attainment (or designated as unclassifiable) for all pollutants subject to a National Ambient Air Quality Standard (NAAQS).



Figure 1: Location Nassau County, Florida



Figure 2: Rayonier Performance Fibers LLC  
Fernandina Beach Mill

This plant produces approximately 10 different grades of pulp. The pulp produced at this plant is used in products such as plastics, photographic film, LCD screens, paints, cigarette filters, pharmaceuticals, food productions, cosmetics and textiles. The mill is permitted to produce 175,000 ADMT of pulp on a 12 month rolling total basis.

The sulfite process utilizes a sulfurous acid and ammonium bisulfite cooking solution to chemically separate the lignin from the cellulose. Pine wood chips and cooking solution are cooked in the six (6) batch digesters. The cooking process requires approximately 6 hours to complete. The unbleached sulfite pulp and spent cooking solution (SSL- spent sulfite liquor) are separated over vacuum washers (red stock washers). The unbleached pulp is then sent into the screening area to remove any knots and tailings (uncooked, woody materials), while the SSL is pumped to the evaporators to concentrate the solids content before being burned in the recovery boiler. The collected knots and tailings are pressed for use as fuel in the No. 6 Power Boiler.

The sulfurous acid and ammonium bisulfite cooking solution is prepared in the “acid plant”.

The unbleached pulp exiting the screening operation enters the bleach plant. The first stage in the bleaching plant is the Hot Caustic Extraction (HCE) stage. Caustic soda is used to remove hemi-cellulose (small chain cellulose molecules) from the pulp in small pressure vessels called HCE cells. The mill currently operates eight (8) such cells. The pulp is washed after this HCE stage. The spent solution, Hot Caustic Extract, is concentrated in a set of evaporators before being sold to Kraft mills for its sodium content and energy value.

Pulp leaving the HCE stage is further purified in continuous and batch stages using peroxide, chlorine dioxide, chlorine, sodium hydroxide, and sodium hypochlorite depending upon the pulp grade specifications. Following these bleaching stages, the pulp passes through centrifugal dirt cleaners before being sent to the pulp machine. The pulp machine forms the sheet by draining water from the pulp slurry (containing 99% water) over a moving wire to a consistency of 50% water. The remainder of the water is removed by passing the pulp sheet over pressing and drying cylinders heated internally with steam. The pulp sheet, which contains approximately 7% moisture, is then wound onto a “jumbo” before being transported to the finishing room where the pulp sheet is cut into smaller rolls or sheets based on customer specifications. No coatings are used on any of the pulp grades produced by the mill.

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The digestion, the HCE stage, and the pulp machine are high users of steam for heating. The steam is produced in the power boiler. Steam is also used to produce about 100 percent of the mill's electricity needs.

The recovery boiler provides steam for the evaporators and its emissions are scrubbed for sulfur dioxide recovery using an ammonia solution. The ammonium bisulfite produced in the scrubber is used for cooking acid make-up.

### Facility Regulatory Categories

- 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility has one or more emissions units subject to NSPS (40CFR 60).
- This facility has one or more emissions units subject to NESHAP (40 CFR 61 or Part 63)

### Processing Schedule

12/31/12	Department received the Application for Air Permit – Long Form
1/30/13	Department Request for Additional Information
4/19/13	Additional Information received
6/7/13	Draft permit issued
6/28/13	Comment received from applicant on draft permit
7/9/13	New Draft Permit issued

### Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of the draft permit distributed with this evaluation.

## 2. PSD APPLICABILITY

### General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal

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units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, Portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the “significant emission rates” defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO<sub>x</sub>); sulfur dioxide (SO<sub>2</sub>); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM<sub>10</sub>); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H<sub>2</sub>S); total reduced sulfur (TRS), including H<sub>2</sub>S; reduced sulfur compounds, including H<sub>2</sub>S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO<sub>2</sub> and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m<sup>3</sup>, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered “significant” for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

### Project Description

Rayonier proposes to increase the No. 6 Power Boiler’s hourly heat input rate from 525 to 660 MMBtu/hr (averaged over a 24-hour period) and from 450 to 525 MMBtu/hr (averaged over an annual period). This increase in heat input capacity will allow the steam production rate to increase to 400,000 lb/hr and 330,000 lb/hr averaged on a 24-hour and annual basis, respectively. It will allow for the increase in steam production at the mill from carbonaceous fuels above facility pulp productions needs to allow the facility to produce additional electricity for sale to the public utility.

Rayonier will retain the hourly PM mass emission limit of 36.75 lbs/hr established in Construction Permit No. 0890004-018-AC. This results in a new PM limit of 0.0557 lb/MMBtu at the proposed maximum heat input of 660 MMBtu/hr. The facility provided CEMS data that indicates the boiler is capable of complying with this new PM limit.

Rayonier will retain the annual emissions caps established in previously issued Construction Permit No. 0890004-018-AC for SO<sub>2</sub>, NO<sub>x</sub>, and CO emissions.

The applicant provided three years of CEMS data, years 2010-2012, as confirmation that the boiler can meet the requested annual SO<sub>2</sub>, NO<sub>x</sub>, and CO emissions caps. These years reflect the wet scrubber operation, which is the current and future operational configuration.

To determine the potential SO<sub>2</sub>, NO<sub>x</sub>, and CO emissions at the requested 525 MMBtu/hr heat input rate (averaged annually), the applicant applied the highest lb/MMBtu value for any of the three years. The data shows that the

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annual emissions at the proposed higher heat input rate are below the emissions caps, except for NO<sub>x</sub> emissions.

**Table A. Summary of CEMS SO<sub>2</sub>, NO<sub>x</sub>, and CO Emissions (2010-2012), No. 6 Power Boiler:**

Year	Heat Input (MMBtu/yr)	SO <sub>2</sub> Emission Rate		NO <sub>x</sub> Emission Rate		CO Emission Rate	
		TPY	lb/MMBtu	TPY	lb/MMBtu	TPY	lb/MMBtu
2010	3,424,017	19.3	0.0113	312.0	0.182	280.0	0.164
2011	3,262,125	29.70	0.0182	296.3	0.182	141.4	0.087
2012	3,613,670	2.57	0.0014	289.7	0.160	200.2	0.111
<b>Maximum</b>	<b>3,424,017</b>	<b>29.70</b>	<b>0.0182</b>	<b>312.0</b>	<b>0.182</b>	<b>280.0</b>	<b>0.164</b>
<b>Projected Emissions @ Requested Heat Input Rate</b>	<b>4,599,000</b>	<b>41.9</b>	0.0182	<b>419.1</b>	<b>0.182</b>	<b>376.1</b>	0.164
<b>Permit Limit</b>		<b>210</b>	0.8	<b>380</b>	<b>0.3</b>	<b>591.3</b>	0.3

The potential NO<sub>x</sub> annual emissions at the proposed higher heat input rate are determined to be 419.1 tons per year ((0.182 lb/MMBtu x 525 MMBtu/hr x 8,760 hrs/yr)/ 2000 lbs/ton) versus the 380 tons per year limitation.

In order to continue to meet the emission cap of 380 PTY, the NO<sub>x</sub> emission rate would need to be no more than 0.165 lb/MMBtu at the maximum annual heat input rate of 4,599,000 MMBtu/yr (525 MMBtu/hr x 8,760 hours per year).

The submitted table shows that this level of control was achieved in year 2012. The No. 6 Power Boiler has a selective non-catalytic reduction (SNCR) control system in place for NO<sub>x</sub> control. It was installed in June 2010. The applicant states that the mill can maintain NO<sub>x</sub> emissions below a desired level by adjusting the ammonia injection rate to the SNCR control system. The applicant also states that the CEMS includes a stack flow monitor and hourly NO<sub>x</sub> emissions in pounds per hour are monitored and recorded by the system.

As such, the Department will continue to require in the draft permit that the SNCR be operated as needed to meet the NO<sub>x</sub> emissions limits using the NO<sub>x</sub> CEMS to insure all permit limits are met.

As a part of the project, Rayonier is also proposing to remove Spent Sulfite Liquor (SSL) as an authorized fuel in the boiler.

On June 7, 2013, the Department issued a draft permit package for the proposed project. On June 28, 2013, the applicant submitted comments on the draft permit. The Department has revised the draft permit based on the comments.

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**PSD Applicability for Project**

The applicant states that no physical changes to the boiler will be required as a result of the proposed project. In addition, the boiler is already able to achieve steam production rates almost as high as 400,000 lbs/hr, based on historical operation of the boiler. The facility provided the maximum hourly steam flow rates for the last three years. The highest actual hourly rate achieved was 395,221 lbs/hr of steam, and the highest hourly heat input rate was 652 MMBtu/hr.

The applicant states that no other emissions units at the facility will be affected by the proposed project. There will be no increase in emissions from other emissions units as a result of the increase in the annual heat input of the No. 6 Power Boiler.

The following table summarizes the net increases in emissions attributable to the project based on the submitted application:

**Table B. Annual Emissions Summary and PSD Applicability**

Pollutant	No. 6 Power Boiler Annual Emissions Summary, Tons/Year				
	Baseline Actual Emissions	Projected Actual Emissions	Projected Increases	PSD Significant Emissions Rate	Subject to PSD?
SO <sub>2</sub>	31.06	70.0	38.9	40	No
NO <sub>x</sub>	304.2	340.0	35.9	40	No
CO	234.2	320.0	85.8	100	No
PM	30.1	35.8	5.7	25	No
PM <sub>10</sub>	51.1	60.5	9.4	15	No
PM <sub>2.5</sub>	48.3	57.2	8.8	10	No
VOC	1.35	1.60	0.24	40	No
SAM	1.37	3.12	1.75	7	No
Pb	2.5E-02	2.9E-02	4.3E-03	0.6	No
Hg	1.47E-03	1.74E-03	2.66E-04	0.1	No
Fluorides	0.010	0.013	0.003	3	No
GHG <sup>a</sup>	20,709	28,059	7,350	0	-
CO <sub>2e</sub>	27,896	36,374	8,479 <sup>b</sup>	75000	No

<sup>a</sup> GHG = sum of emission rates of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O on a mass basis. CO<sub>2e</sub> = sum of emission rates of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O using global warming potentials. PSD applicability analysis excludes biogenic CO<sub>2</sub> emissions per EPA PSD Tailoring Rule.

<sup>b</sup> GHG emission increase must be greater than or equal to zero TPY **and** CO<sub>2e</sub> emissions increase must be greater than or equal to 75,000 TPY.

The applicant states that there is no demand growth emissions presented since the increase in emissions is due to a relaxation of the current hourly heat input limit of 450 MMBtu/hr (averaged annually). Operation of the boiler above 450 MMBtu/hr annual average cannot be attributed to demand growth (i.e. the boiler could not achieve this higher rate absent the proposed project, due to the permit limitation).

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As shown in above the table, there are no emissions increases that exceed the PSD Significant Emission Rate; therefore PSD review is not applicable to this project.

The applicant states that PSD regulations require that whenever a permit restriction limiting the annual emissions (such as a restriction on hours of operation, production capacity, or other limitation) is taken to avoid PSD review, and such restrictions are relaxed, the project must be evaluated as if construction had not yet commenced on the project. In other words, the original baseline emission must be used to evaluate the current project. The original baseline emissions were based on the actual emissions from Boiler Nos. 1, 2, and 3, which were shutdown as part of the No. 6 Power Boiler original construction project, Permit No. 0890004-018-AC. Below is a comparison of those original baseline emissions and the project actual emissions for the currently proposed project.

**Table C. Original Project Baseline Emissions-Projected Actual Emissions PSD Applicability**

<b>Pollutant</b>	<b>Original Baseline Emissions (TPY)</b>	<b>Projected Actual Emissions (TPY)</b>	<b>Net Increase (TPY)</b>
PM	276.06	35.8	-240.26
PM10	242.48	60.5	-181.98
SO <sub>2</sub>	181.96	70.0	-111.96
NO <sub>x</sub>	340.95	340.0	-0.95
CO	690.75	320.0	-370.75
VOC	52.40	1.60	-50.8

As shown in the table above, the net increase in emissions does not exceed the PSD significant emission rates. Therefore PSD review is not applicable to this project.

### **3. FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION (FDEP) REVIEW**

#### **Brief Discussion of Emissions and PSD Applicability**

Because the project involved a modification at an existing emissions unit, pursuant to Rule 62-212.400(2)(a), F.A.C., the review procedure used to determine whether a significant emission increase will occur as a result of this project is the Baseline Actual-to-Projected Actual Applicability Test for Modifications at Existing Emissions Units.

The analysis avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

- a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C.

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- b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 10-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
- (1) The name, address and telephone number of the owner or operator of the major stationary source;
  - (2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C.;
  - (3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
  - (4) Any other information that the owner or operator wishes to include in the report.
- c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.
- d. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. For this project, the permittee shall use the following methods in reporting the actual annual emissions for the following **pollutants** emitted from the No. 6 Power Boiler (identified as Emission Unit No. 022):
- (1) The permittee shall use the data collected from the required stack tests to determine and report the actual annual emissions of **PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC**. The methodology for calculating PM<sub>10</sub>, and PM<sub>2.5</sub> baseline emissions shall be used to calculate the actual annual emissions. The permittee shall follow the stack test methods, test procedures and test frequencies specified in the current Title V air operation permit.
  - (2) Unless otherwise approved by the Department, the permittee shall use CEMS data for reporting the actual annual emissions of **SO<sub>2</sub>, CO, NO<sub>x</sub>**.
  - (3) Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions of **Pb, Hg, SAM, Fluorides, GHG, and CO<sub>2e</sub>** as used in the application to establish baseline emissions.
- f. As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

Based on the projections, supporting information provided by the applicant, conclusions presented by the applicant, and the emissions summary presented in Tables B. and C. above, the Department agrees that the project does not trigger PSD preconstruction review.

Therefore, the project requires a minor air construction permit.

### Rule Applicability

#### Hazardous Air Pollutants

The existing facility, prior to this modification, was classified as a major source of HAP emissions. Based on the potential facility-wide HAP emissions presented in this application, the facility remains classified as major source pursuant to 40 CFR 63.2. Potential HAP emissions are greater than major source thresholds of 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.

#### NESHAP Applicability

No additional NESHAP regulations are applicable to this emission unit due to this project. EPA published the final NESHAPs for the category of industrial, commercial, and institutional boilers and process heaters on January 31, 2013. The No. 6 Power Boiler will be subject to the standards under the subcategory for existing

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fluidized bed units designed to burn biomass/bio-based solids. The Subpart sets emission limits for particulate matter, hydrogen chloride, mercury, and carbon monoxide. The compliance date for this Subpart is January 31, 2016.

### NSPS Applicability

A project for an existing unit may trigger the federal New Source Performance Standards (NSPS) in two ways.

- A. The project is considered a modification when the project results in an increase in the hourly mass emissions rate of an NSPS-regulated pollutant.

In the January 30, 2006 Technical Evaluation and Preliminary Determination for Permit No. 0890004-018-AC, it is stated that the No. 6 Power Boiler will have a maximum heat input rate of 525 MMBtu/hr. Rayonier avoided 40 CFR 60 Subpart Db applicability, at that time, by restricting the maximum capacity of the boiler to 525 MMBtu/hr in a federally enforceable construction permit.

Rayonier is requesting in this project to increase in the hourly heat input rate of the boiler to 660 MMBtu/hr averaged over a 24-hour period and 525 MMBtu/hr averaged annually. This request is considered to be change in the method of operation. However, a modification pursuant to 40 CFR 60.14(a) and (b) will not occur with this operational change because Rayonier will maintain the current NO<sub>x</sub> and SO<sub>2</sub> pound per hour emissions rates which are based on previously authorized 525 MMBtu/hr heat input, i.e. 101.2 lb/hr and 420.0 lb/hr respectively. These limits will be federally enforceable limits through the issuance of this construction permit. As such, applicability of 40 CFR 60, Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units is not triggered.

The No. 6 Power Boiler remains subject to 40 CFR 60, Subpart D—Standards of Performance for Fossil Fuel Fired Steam Generators for which Construction is Commenced after August 17, 1971.

- B. Pursuant to 40 CFR 60.15, a project is considered reconstruction when the fixed capital costs of the replacement components exceed 50% of the fixed capital costs for a comparable new replacement unit.

Rayonier states that no physical changes to the boiler are required to implement the requested heat input increase; the boiler is already capable of achieving these rates, as demonstrated by historical boiler operation. Therefore the project will not be considered reconstruction.

### CAM Applicability

The No. 6 Power Boiler is presently subject to the requirement so Compliance Assurance Monitoring (CAM) in accordance with 40 CFR Part 64 for the pollutant PM. It is noted that with the installation of the SNCR, the No. 6 Power Boiler may be subject to CAM for the pollutant NO<sub>x</sub> as well.

CAM applies to emission units [excluding those identified as meeting the Part 64 CAM Exemptions] at major sources that meet all of the following:

- The emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;

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- The emission unit uses a control device to achieve compliance with the emission limitation or standard; and
- The emission unit has the pre-control device potential to emit of the regulated air pollutant greater than or equal to the amount in tons per year required for a site to be classified as a major source (e.g. 100 tons per year for criteria pollutants)

One of the Part 64 CAM Exemptions includes emission limitations or standards for which a Part 70 or 71 permit specifies a continuous compliance determination method that does not use an assumed control factor [§ 64.2(b)(1)(vi)]. The No. 6 Power Boiler has a CEMS which is used to determine compliance with the NO<sub>x</sub> emissions limit.

Applicability for CAM is determined on a pollutant-by-pollutant basis; therefore, all of the above criteria must be satisfied for a particular pollutant for each emission unit to be subject to CAM for that pollutant. If an emission unit meets the applicability test specified within the regulation, then the source must submit a CAM Plan proposing monitoring to provide reasonable assurance of compliance with the applicable emission limitation, along with a justification for choosing the proposed monitoring, with the Title V Permit application.

### **Applicability of Previous Permits**

Existing Permits and Regulations: The conditions of this permit supplements all other previously issued air construction and operation permits for this emissions unit. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting and the like.

### **4. PRELIMINARY DETERMINATION**

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Rita Felton-Smith is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection, Northeast District Office, 8800 Baymeadows Way, Suite 100, Jacksonville, FL 32256, Phone: 904/256-1700.