PERMITTEE

Amelia Island Energy, LLC
801 North 14th Street
Fernandina Beach, FL 32034

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 0890447-001-AC
Minor Air Construction Permit
Amelia Island Energy

Amelia Island Energy, LLC (AIE) proposed to construct an electricity/steam cogeneration system on the property of the Fernandina Beach Mill, a pulp and paper mill owned by WestRock. The proposed cogeneration system consists of a natural gas fired combustion turbine-electrical generator equipped with a heat recovery steam generator (HRSG) that combines turbine waste heat with natural fired in the HRSG duct burners to supply steam to the Fernandina Beach Mill.

NOTICE AND PUBLICATION

The Department distributed a draft minor air construction permit package on September 15, 2020. The applicant published the Public Notice in The Florida Times-Union on October 6, 2020. The Department received the proof of publication on October 14, 2020. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

No comments on the Draft Permit were received from the public or the EPA Region 4 Office. Comments on the Draft Permit were received from the applicant.

Applicant

On October 13, 2020, the Department received comments from the applicant. The following summarizes the comments and the Department's response.

1. The applicant stated facility ID on the placard page should be 0890447 instead of 0890003.

   Response: The Department agrees with this comment. The typographical error has been corrected. The facility ID on the placard page is now 0890447.

2. The applicant suggested that descriptive language throughout the permit be revised to reflect that the natural gas process heater is exempt pursuant to Rule 62-210.300(3)(a)34., F.A.C.

   Response: Descriptive language in the permit is not federally enforceable and exists for informational purposes only. The requested change would have no bearing on state rule applicability. Therefore, the requested changes will not be made.

3. The applicant requested correction to a typographical error in Section 3, Subsection A, Specific Condition 9, paragraph a.

   Response: The Department agrees with this comment. Removed language from paragraph a is marked by a strikethrough and also highlighted in yellow for clarity. The paragraph is revised as follows:

a. *CT Operation without Duct Burning*. As determined by ~~or~~ stack test (3-run average), NO_X emissions shall not exceed 9 parts per million by volume, dry (ppmvd) at 15% oxygen (O_2) while the CT operates without duct burning.

4. The applicant requested that the HRSG duct burner natural gas recordkeeping requirements in Section 3, Subsection A, Specific Condition 31 be revised to reflect recordkeeping on a 12-month rolling average basis to reflect that the HRSG duct burner natural gas usage limit is based on a 12-month rolling average.

   Response: The Department agrees that compliance requirements should reflect the averaging period of the corresponding operational limit. Additionally, the annual natural gas usage limit should be based on a 12-month rolling total. Removed language is marked by a strikethrough and added language is marked by a double underline. Language revisions are highlighted in yellow for clarity. Specific Conditions 5 and 31 of Section 3, Subsection A have been revised as follows:

   5. Authorized Fuel: The CT and HRSG duct burners shall be fired exclusively with natural gas. The HRSG duct burners shall not fire more than 1,778.66 million standard cubic feet per year (MMscf/yr), based on a 12-month rolling ~~average~~ total. [Rules 62-210.200(PTE) & 62-212.400(PSD Avoidance), F.A.C.; and, Application No. 0890447-001-AC]

   31. HRSG Duct Burner Natural Gas Usage Report: The permittee shall record the daily amount of natural gas consumed by the HRSG duct burners and record and maintain records of monthly duct burner natural gas consumption on a ~~30-day~~ 12-month rolling ~~average~~ total basis. Such data shall be used to demonstrate compliance with the duct burner natural gas consumption limit in Specific Condition **5** of this subsection. Such records shall be kept for 5 years in a form available for Department inspection upon request. [Rules 62-4.070(3) & 62-212.400(PSD Avoidance), F.A.C.]

CONCLUSION

The final action of the Department is to issue the permit with the minor changes, corrections and clarifications as described above.