TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Foley Cellulose LLC
One Buckeye Drive
Perry, FL 32348

Foley Mill
Facility ID No. 1230001

PROJECT

Project No. 1230001-055-AC
Application for Air Construction Permit
EU002 No. 1 Power Boiler NCG burning hours increase;
Also changing the permit condition language in Subsection 1. GENERAL INFORMATION, Item 7 and Subsection 3, EU 046 and Condition No. A.0.g. Permit No. 1230001-046-AC for EU 046 to be consistent with the Final Consent Order (OGC No. 14-0227).

COUNTY

Taylor, Florida

PERMITTING AUTHORITY

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

12/8/2014

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: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

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 categories. 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. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

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 Description and Location

Foley Cellulose LLC is an existing Kraft Process Pulp Mill, which is categorized under Standard Industrial Classification Code No. 2611. The facility is be located in Taylor County at east of US 19, south of SR 30, southeast of Perry, Florida. The UTM coordinates of the existing facility are Zone 17, 256.7 km East and 3328.7 km North; Latitude: 30°03’59” North and Longitude: 83°33’12” West. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility **is** a major source of hazardous air pollutants (HAP).
- The facility **has no** 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.

Project Description

Air construction permit, which authorizes EU002 No. 1 Power Boiler NCG burning hours to increase from 960 hours per year to 2,800 hours per year; also changing the permit condition language in Subsection 1. GENERAL INFORMATION and Subsection 3, EU 046 and Condition No. A.0.g. Permit No. 1230001-046-AC for EU 046 to be consistent with the final Consent Order (OGC No. 14-0227).

Currently, Low Volume, High Concentration (LVHC) non-condensable gases (NCGs) from the pulp mill at the Foley Mill are collected and routed to the No. 1 Bark Boiler (EU 004) as the primary combustion device and the No. 1 Power Boiler (EU 002) as the backup combustion device. The No. 1 Power Boiler is currently limited to 960 hours of operation per year (hrs/yr) as the backup NCG destruction device.

The Foley Mill has had to increase its utilization of the No. 1 Power Boiler to control NCGs because the No. 1 Bark Boiler has been unavailable for this purpose more than expected.

Through the first three quarters of 2014, the Foley Mill has logged 709 hours of NCG destruction in the No. 1 Power Boiler. It is therefore projected that the Mill may need to combust NCGs in the No. 1 Power Boiler more than the 960 hrs/yr by the end of calendar year 2014. As a result, the Mill is requesting an increase the allowable hours to combust NCGs in the No. 1 Power Boiler from 960 to 2,800 hrs/yr.

Processing Schedule

11/26/14 Received the application for an air pollution construction permit.

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 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_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; 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_2 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 $\mu g/m^3$, 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.

PSD Applicability for Project

EU002 No. 1 Power Boiler and emissions from the project.

As provided in the application, the following table summarizes potential emissions and PSD applicability for the project.

Table 4-3: PSD Applicability Analysis

Pollutant	BAE (TPY)	PAE (TPY)	PAE – BAE[a] (TPY)	PSD SER (TPY)	PSD Review Triggered?
SO_2	506.47	194.70	0.00	40	No
NO_x	131.81	159.84	28.03	40	No
CO	39.53	47.81	8.28	100	No
PM	34.30	2.71	0.00	25	No
PM_{10}	32.64	5.77	0.00	15	No
$PM_{2.5}$	22.38	5.28	0.00	10	No
VOC	2.59	3.13	0.54	40	No
TRS	0.22	0.85	0.64	10	No
SAM	22.92	11.51	0.00	40	No
Lead	0.0028	0.000396	0.00	0.6	No
Mercury	0.000224	0.000154	0.00	0.1	No
GHGs – mass basis	56,584	69,186	12,602	0	No
GHGs – CO_2e basis	56,643	69,266	12,623	75,000	

[a] If the emissions increase is less than zero, than the difference is set to zero.

Table 4-2: Projected Actual Emissions

Pollutant	PAE (TPY)
SO_2	194.70
NO_x	159.84
CO	47.81
PM	2.71
PM_{10}	5.77
$PM_{2.5}$	5.28
VOCs	3.13
TRS	0.85
SAM	11.51
Lead	0.000396
Mercury	0.000154
GHGs – mass basis	69,186
GHGs – CO_2e basis	69,266

Table 4-1: Baseline Actual Emissions (BAE) and Baseline Periods

Pollutant	BAE (TPY)	Baseline Period
SO_2	506.47	November 2004 – October 2006
NO_x	131.81	May 2012 – April 2014
CO	39.53	May 2012 – April 2014
PM	34.30	November 2004 – October 2006
PM_{10}	32.64	November 2004 – October 2006
$PM_{2.5}$	22.38	November 2004 – October 2006
VOCs	2.59	May 2012 – April 2014
TRS	0.22	May 2012 – April 2014
SAM	22.92	November 2004 – October 2006
Lead	0.0028	November 2004 – October 2006
Mercury	0.000224	November 2004 – October 2006
GHGs – mass basis	56,584	November 2004 – October 2006
GHGs – CO_2e basis	56,643	November 2004 – October 2006

Table A-1: Emission Factors Used To Determine Baseline Actual Annual Emissions of No. 1 Power Boiler (EU 002)

Source Description	Factor Units	Pollutant Emission Factors														
					Filterable			Condensable								
		SO_2	NO_x	CO	PM	PM_{10}	$PM_{2.5}$	PM	VOC	TRS	SAM	Lead	Mercury	CO_2	CH_4	N_2O
No. 1 Power Boiler (EU 002)																
- *No. 6 Fuel Oil*	lb/10^3 gal	157(S) [A]	47 [A]	5 [A]	9.19(S)+3.22 [A]	86% [B]	58% [B]	1.5 [C]	0.28 [D]	–	5.7(S)*98/80 [A]	1.51E-03 [E]	1.13E-04 [E]	24,835 [F]	0.992 [F]	0.198 [F]
- *Natural Gas*	lb/10^6 ft^3	0.6 [G]	280 [H]	84 [H]	1.9 [G]	100% [G]	100% [G]	5.7 [H]	5.5 [G]	--	--	5.00E-04 [G]	2.60E-04 [I]	120,019 [F]	2.262 [F]	0.226 [F]
- *NCG Burning*	lb/ADTUBP	1.812 [J]	– [K]	– [K]	– [K]	– [K]	– [K]	–	– [K]	9.06E-03 [J]	0.111 [L]	– [K]	– [K]	3.25 [M]	4.65E-04 [M]	1.86E-04 [M]

[A] AP-42 Table 1.3-1. (S) is the fuel oil sulfur content in percent by weight. SO_2 emission factor (5.7(S)) is multiplied by the ratio of molecular weights of SAM to SO_2 (98/80).

[B] AP-42 Table 1.3-5 for uncontrolled emissions from industrial boilers burning residual oil.

[C] AP-42 Table 1.3-2 for all controls.

[D] AP-42, Table 1.3-3 for Industrial Boilers.

[E] AP-42, Table 1.3-11.

[F] 40 CFR 98 Subpart C. Emission factors for No. 6 fuel oil are 75.1 kg/MMBtu for CO_2, 0.003 kg/MMBtu for CH_4, and 0.0006 kg/MMBtu for N_2O. Emission factors for natural gas are 53.06 kg/MMBtu for CO_2, 0.001 kg/MMBtu for CH_4, and 0.0001 kg/MMBtu for N_2O. Heating values are 150 MMBtu/10^3 gal for No. 6 fuel oil and 1,026 MMBtu/10^6 ft^3 for natural gas.

[G] AP-42, Table 1.4-2, uncontrolled emissions.

[H] AP-42, Table 1.4-1. Based on uncontrolled emissions.

[I] AP-42, Table 1.4-4.

[J] Based on data provided by NCASI on typical composition of LVHC NCGs from Kraft pulp mills, median values (see Table A-4). TRS emission factor from LVHC system is 1.812 lb/ADTUBP (as S). This value is reduced by 50% in the TRS prescrubber to 0.906 lb/ADTUBP. The TRS emission factor is reduced by 99% destruction efficiency in the No. 1 Power Boiler, resulting in a TRS emission factor of 0.00906 lb/ADTUBP (as S). The SO_2 emission factor is derived by converting the uncontrolled TRS emission factor to SO_2 by multiplying by the ratio of molecular weights of SO_2 to S (64/32), resulting in an SO_2 emission factor of 1.812 lb/ADTUBP.

[K] Based on recent discussions with Dr. Arun Somershwar of NCASI, there is negligible impact on filterable PM emissions, NOx emissions, CO emissions and VOC emissions when combusting NCGs in a power boiler that fires fossil fuels. Therefore, the contribution of these pollutant emissions from NCG combustion in the No. 1 Power Boiler is assumed to be zero. No emission factor exists for condensable PM, lead, or mercury emissions.

[L] SAM emission factor assumes 5% of SO_2 emissions become SO_3 (similar to fuel oil) and then multiplied the ratio of molecular weights of SAM to SO_3 (98/80).

[M] Based on NCASI memo dated February 14, 2011 (revised March 21, 2011).

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

All projected increases of PSD pollutants are below the PSD Significant Emission Rate thresholds presented in Chapter 62-210, F.A.C. Based upon this conclusion, no further PSD review is required.

The project therefore requires a minor air construction permit to authorize the increase hours of NCG burning in the No. 1 Power Boiler to 2,800 hrs/yr.

Pursuant to Rule 62-212.300(1)(e), F.A.C., the applicant shall provide reports in summarizing actual emissions of all pollutants listed in the above table computed in accordance with the requirements of Rule 62-210.370, F.A.C. for each year during the 10-year period following completion of the project.

3. APPLICATION REVIEW

Discussion of Emissions

Currently, Low Volume, High Concentration (LVHC) non-condensable gases (NCGs) from the pulp mill at the Foley Mill are collected and routed to a combustion device for compliance with State and federal air pollution control regulations. The No. 1 Bark Boiler (EU 004) serves as the primary combustion device for the LVHC NCGs and the No. 1 Power Boiler (EU 002) serves as the backup combustion device. The No. 1 Power Boiler is currently limited to 960 hours of operation per year (hrs/yr) as the backup NCG destruction device. The Foley Mill has had to increase its utilization of the No. 1 Power Boiler to control NCGs because the No. 1 Bark Boiler has been unavailable for this purpose more than expected. As a result, the Mill is requesting that FDEP increase the allowable hours to combust NCGs in the No. 1 Power Boiler from 960 to 2,800 hrs/yr.

The current SO2 and PM emission limits were originally based on fuel oil firing only, and not NCG firing. The emission limits were calculated as follows:

- Heat Input Rate: 249 MMBtu/hr.

No. 6 Fuel Oil: 1,712 gallons per hour based on 145.4 MMBtu/103 gallons; 2.5 percent sulfur by weight.

SO2 Emission Factor: 157(S) lb/103 gallons from AP-42, Table 1.3-1.

SO2 Emissions: 157(2.5) lb/103 gal x 1.712x103 gallons x 8,760 hr/yr x 1 ton/2,000 lb = 2,943.18 TPY.

PM Emission Factor: 28 lb/103 gallons from older edition of AP-42.

PM Emissions: 28 lb/103 gal x lb/103 gal x 1.712x103 gallons x 8,760 hr/yr x 1 ton/2,000 lb = 209.96 TPY.

Increasing the hours of NCG combustion in the No. 1 Power Boiler will not affect the SO2 and PM emission limits based on the following calculations:

- Annual Heat Input: 249 MMBtu/hr x 8,760 hr/yr = 2,181,240 MMBtu/yr.

Heat Input from Fuel Oil: 2,181,240 MMBtu/yr x 2% from Fuel Oil = 43,624.8 MMBtu/yr from Fuel Oil.

Heat Input from Natural Gas: 2,181,240 MMBtu/yr x 98% from Fuel Oil = 2,137,615.2 MMBtu/yr from Natural Gas.

- SO2 Emissions:

Fuel Oil: 157(2.5) lb/103 gal x 103 gal/150 MMBtu x 43,624.8 MMBtu/yr x 1 ton/2,000 lb = 57.08 TPY.

Natural Gas: 0.6 lb/106 ft3 x 106 ft3/1,026 MMBtu x 2,137,615.2 MMBtu/yr x 1 ton/2,000 lb = 0.63 TPY.

NCG Burning: 1.812 lb/ADTUBP x 2,532 ADTUBP/day x 365 days/yr x 1 ton/2,000 lb = 837.31 TPY.

Total: 57.08 TPY + 0.63 TPY + 837.31 TPY = 895.01 TPY.

- PM Emissions:

Fuel Oil: [9.19(2.5) + 3.22] lb/103 gal x 103 gal/150 MMBtu x 43,624.8 MMBtu/yr x 1 ton/2,000 lb = 3.81 TPY.

Natural Gas: 1.9 lb/106 ft3 x 106 ft3/1,026 MMBtu x 2,137,615.2 MMBtu/yr x 1 ton/2,000 lb = 1.98 TPY.

- NCG Burning: 0 TPY.
-
- Total: 3.81 TPY + 1.98 TPY + 0 TPY = 5.79 TPY.

As shown by the SO2 and PM calculations, combusting NCGs in the No. 1 Power Boiler while the boiler fires natural gas and No. 6 fuel oil at the "projected actual" firing rates, does not result in higher emission limits than are already in effect in the Title V Permit.

However, increasing the hours of NCG combustion in the No. 1 Power Boiler will affect the TRS emission limit due to the combustion of NCGs for more hours per year. The current TRS emission limit is based on a concentration of 5 ppmvd corrected to 10% O2 and a design exhaust gas flow rate of 86,000 dry standard cubic feet per minute (dscfm). The concentration-based emission limit corresponds to a maximum permitted emission rate of 2.28 pounds of TRS per hour (lb/hr). The annual emission limit of 1.1 TPY is based on the currently permitted maximum hours of NCG combustion of 960 hrs/yr. These emission limits were established in air construction permit Nos. 1230001-011-AC, 1230001-012-AC, and 1230001-18-AC.

The Mill is requesting that the annual TRS emission limit be increased to 3.19 TPY. The requested annual emission limit is based on combusting NCGs in the No. 1 Power Boiler for a maximum of 2,800 hrs/yr as shown in the calculation below:

2.28 lb/hr x 2,800 hrs/yr x 1 ton/2,000 lb = 3.19 TPY.

The emissions increase for total reduced sulfur (TRS) compounds was less than the PSD significant emission Rate of 10 TPY. However, because the project increases the potential to emit of a TRS, a PSD pollutant, pursuant to Rule 62-210.300(e)(1), F.A.C., the applicant is required to 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 project instead of 5 years.

No other emission sources at the Foley Mill will be impacted by this change.

The permittee shall use the data collected from the required stack tests to determine and report the actual annual emissions of **TRS, PM and SO2.**

State Requirements

Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.

Rule 62-296.404(3)(f)1., F.A.C.

Other Draft Permit Requirements

The No. 1 Power Boiler is a boiler that may be fired with No. 6 fuel oil, No. 2 fuel oil, facility generated on-specification used oil, tall oil, natural gas, and any mixture of these fuels. The No. 1 Power Boiler also serves as a backup combustion device to the No. 1 Bark Boiler for combustion of LVHC gases.

Air construction permit, which authorizes EU002 No. 1 Power Boiler NCG burning hours increase from 960 hours per year to 2,800 hours per year.

Permit(s) Being Modified: Permit No. 1230001-018-AC

Affected Emissions Unit: EU 002 No. 1 Power Boiler

Subsection 3, EU 002, Specific Condition No. A.3. and A.6.

This permit only modifies the NCG Burning. The facility is still subject to the currently permitted Methods of Operation for Natural gas, No. 6 fuel oil, residual oil, and facility-generated on-specification used oil, Facility-generated Tall Oil[1] and Tall Oil manufactured offsite.

A.3. <u>Methods of Operation</u>. This permit will only alter the NCGs during periods when the boiler is being utilized for their destruction. This boiler may be fired with NCGs:

NCGs during periods when the boiler is being utilized for their destruction. Such operation shall occur for a period not to exceed ~~960~~ 2,800 hours per year.

[Rule 62-213.410, F.A.C.; Rule 62-210.700, F.A.C.; Construction Permit No. 1230001-018-AC; Construction Permit No. 1230001-023-AC; Construction Permit No. 1230001-025-AC, Construction Permit No. 1230001-027-AC, and Construction Application No. 1230001-055-AC]

This permit only modifies the TRS emission standards. The facility is still subject to the currently permitted emission standards for PM, SO2, and VE.

A.5. <u>Total Reduced Sulfur (TRS) Emissions</u>. When NCG gases are collected and routed to this Emissions Unit, TRS emissions shall not exceed 5 ppmvd @ 10% O_2, as a 12 hour average; 2.28 lbs/hr and ~~1.1.~~ 3.19 TPY. TRS Emissions shall be incinerated for a minimum of 0.5 second and at a minimum of 1200°F.

[Rule 62-296.404(3)(f)1., F.A.C.; Construction Permit No. 1230001-011-AC; Construction Permit No. 1230001-012-AC, Construction Permit No. 1230001-018-AC, and Construction Application No. 1230001-055-AC]

EU046 Pulping System MACT I

ID No.	Emission Unit Description
046	Pulping System MACT I includes those sources regulated under MACT I: Nos. 1 and 2 Batch Digester systems, the Turpentine Recovery system (includes the turpentine Condenser, Decanter, Weir Box, and Underflow Tank), Multiple Effect Evaporator systems (Nos. 1-4), and the Pulping Process Condensate Collection System. Condensates from the Digester blow vent condensing system, the Turpentine Recovery System, the black liquor evaporator condensates from the MEE Systems (Nos. 1-4), and the NCG system condensates are pumped through a closed piping system to the No. 1 Lagoon for treatment to remove HAPs. High Volume, Low Concentration (HVLC) sources include the No. 1 Mill and No. 2 Mill Brown Stock Washer systems, and the Oxygen Delignification System. The aeration stabilization basin of the biological treatment system (the No. 1 Lagoon) is also included in this emissions unit as part of the Clean Condensate Alternative.

B.2. <u>Authorized Modifications</u>. The Permittee is authorized to conduct the following projects for improvements to the existing NCG System.

Permit Being Modified: Permit No. 1230001-046-AC

Affected Emissions Unit: EU 046

Subsection 1. GENERAL INFORMATION Item #7 and Subsection 3, EU 046, Specific Condition No. A.0.g.

This permit only modifies EU046 description as indicated in the wording in blue below.

Two, New, NCG Steam Ejectors – NCG System. Install two new, single steam ejectors in parallel, to provide motive force for the transfer of the NCGs from the 40 CFR 63 Subpart S sources to the control device (No. 1 Bark Boiler and the TRS Pre-Scrubber followed by the No. 1 Power Boiler) locations. Each steam ejector shall have the capacity of 7500 lbs/hr (steam) and capable of handling the entire NCG stream. ~~Only one NCG steam ejector will be operated at any one time.~~ Typically, only one steam ejector will be operated at any one time. The second steam ejector may also be operated (i.e., at the same time as the first) when required to minimize NCG venting. The new ejectors will have the ability to throttle the vacuum to only what is required to effectively transport the NCG vapors to the ejectors. The redundant NCG steam ejector will be used during required maintenance outages that occur several times during the year. The existing, three, NCG steam ejectors (sized 3010 lb/hr, 2630 lb/hr, and 960 lb/hr) shall be removed from the facility site.

[Air Construction Permit No. 1230001-046, and Final Consent Order (OGC No. 14-0227)]

4. PRELIMINARY DETERMINATION

The Department, Northeast District Office, Waste and Air Resource Management Program 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. Leslie Maybin 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 Northeast District Office, Waste and Air Resource Management Program. The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256.