Title V Air Operation Permit Renewal
Permit No. 0310067-010-AV

APPLICANT

The applicant for this project is Rock Tenn CP, LLC. The applicant's responsible official and mailing address are: Scott Grimes, General Manager, Rock Tenn CP, LLC, Jacksonville Mill, P. O. Box 2000, Fernandina Beach, Florida 32035.

FACILITY DESCRIPTION

The applicant operates the Jacksonville Mill, which is located at 9469 Eastport Road.

This facility is a paper mill manufacturing linerboard, medium and bag paper from OCC recycled pulp. The facility also utilizes bleached virgin pulp as an alternative raw material in its products.

Emissions Units 022, 023, and 026 identify package boilers No. 1, 2, and 3. Each of the boilers is sized to provide up to 150,000 pounds per hour of process steam to the facility.

Rock Tenn CP, LLC is permitted to produce up to 450,000 pounds/hour of total steam from all three package boilers. This allows a maximum firing rate of 645 MMBtu/hr total for three package boilers when the Cedar Bay Cogeneration Project (CBCP) facility is shutdown or operating at reduced rates. In addition, Rock Tenn CP, LLC is limited to total steam consumption of 640, 000 pounds/hour.

Emissions Unit 022, 023 and 026: Manufacturer ABB- Combustion Engineering external combustion Package Steam Boiler, Model No. 93104-20. The initial startup date for this EU was March 3, 1994.

CAM **does not** apply.

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

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received April 27, 2011
Notice of Intent to Issue Air Permit issued June 14, 2011
Public Notice Published July 29, 2011

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.

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 operates 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.

PROJECT REVIEW

Brief description of any changes that were made as part of this renewal: Adding applicable requirements for 40 CFR 63, Subpart ZZZZ, updates to 40 CFR 60, Subpart Db, Reformatting, replacement of TV-6 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, etc.). Double underling indicates rule updates and or permit changes.

The BACT is stricter with 5% opacity for natural gas and 10% opacity for low sulfur No. 2 fuel oil. So,

40 CFR 60.43b(f): Affected facility that can combust coal, **oil**, wood, or mixtures of these fuels with any other fuels shall cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

Sulfur Dioxide Emissions Limit Very Low Sulfur Oil. The owner or operator of an affected facility combusting very low sulfur oil shall demonstrate that the oil meets the definition of very low sulfur oil by: (1) Following the performance testing procedures as described in §60.45b(c) or §60.45b(d), **and** following the monitoring procedures as described in §60.47b(a) **or** §60.47b(b) to determine SO_2emission rate or fuel oil sulfur content; **or** (2) maintaining fuel records as described in §60.49b(r).

The SO_2emission standards in §60.42b apply at all times.

[40 CFR 60.42b(j)(2); and 40 CR 60.45b(a)]

Sulfur Dioxide. The owner or operator of an affected facility who elects to use the fuel based compliance alternatives in §60.42b or §60.43b shall either:

(1) The owner or operator of an affected facility who elects to demonstrate that the affected facility combusts only very low sulfur oil, natural gas, wood, a mixture of these fuels, or any of these fuels (or a mixture of these fuels) in combination with other fuels that are known to contain an insignificant amount of sulfur in §60.42b(j) or §60.42b(k) shall obtain and maintain at the affected facility fuel receipts from the fuel supplier that certify that the oil meets the definition of distillate oil and gaseous fuel meets the definition of natural gas as defined in §60.41b and the applicable sulfur limit. For the purposes of this section, the distillate oil need not meet the fuel nitrogen content specification in the definition of distillate oil. Reports shall be submitted to the Administrator certifying that only very low sulfur oil meeting this definition, natural gas, wood, and/or other fuels that are known to contain insignificant amounts of sulfur were combusted in the affected facility during the reporting period; or

(2) The owner or operator of an affected facility who elects to demonstrate compliance based on fuel analysis in §60.42b or §60.43b shall develop and submit a site-specific fuel analysis plan to the Administrator for review and approval no later than 60 days before the date you intend to demonstrate compliance. Each fuel analysis plan shall include a minimum initial requirement of weekly testing and each analysis report shall contain, at a minimum, the following information:

(i) The potential sulfur emissions rate of the representative fuel mixture in ng/J heat input;

(ii) The method used to determine the potential sulfur emissions rate of each constituent of the mixture. For distillate oil and natural gas a fuel receipt or tariff sheet is acceptable;

(iii) The ratio of different fuels in the mixture; and

(iv) The owner or operator can petition the Administrator to approve monthly or quarterly sampling in place of weekly sampling.

[40 CFR 60.49b(r)]

Excess Emissions (NSPS). Submit excess emission reports for any excess emissions that occurred during the reporting period opacity standards in §60.43b(f) . For purposes of §60.43b, excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards under §60.43b(f).

[40 CFR 60.49b(h)]

Excess Emissions (NSPS). Submit excess emission reports for any excess emissions that occurred during the reporting period for NO_Xstandard of §60.44b. For purposes of §60.48b(g)(1), excess emissions are defined as any calculated 30-day rolling average NO_Xemission rate, as determined under §60.46b(e), that exceeds the applicable emission limits in §60.44b.
[40 CFR 60.49b(h)]

E.U. ID No.	Brief Description of Engine	Year Built	Displacement or Horsepower	Rule Applicability
-036	Cummins Diesel Fire Pump	2002	243 BHP	ZZZZ
-037	Caterpillar Emergency Clarifier Lift Pump Generator	1974	250 KW	ZZZZ
-038	Kohler Powerhouse Emergency Generator	1955	35 KW	ZZZZ

{Permitting note(s): These emissions unit(s) are regulated under: 40 CFR 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.}

These stationary internal combustion engines have been exempted from the requirement to obtain an air construction permit because they qualify for one of the categorical exemptions listed in Rule 62-210.300(3)(a), Florida Administrative Code (F.A.C.). However, they are included in this permit as regulated emissions units because they are subject to the above federal rule.

CONCLUSION

This project renews Title V air operation permit No. 0310067-006-AV, which was issued on December 8, 2006. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.