Title V Air Operation Permit Renewal
Permit No. 0890003-031-AV

APPLICANT

The applicant for this project is RockTenn CP, LLC. The applicant's responsible official and mailing address are: Mr. Scott Grimes, General 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.

PROPOSED

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.

PROPOSED

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):

PROPOSED

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

PROPOSED

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.

PROPOSED

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 the boiler during startup only.~~ 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; and 40 CFR 61 Subpart E-National Emission Standard for Mercury.

PROPOSED

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

PROPOSED

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 is a coal fired power boiler, which is fueled by coal, or No. 2 Fuel Oil or No. 6 Fuel Oil during startups, shutdowns, and malfunctions. 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, and 40 CFR Part 60 Subpart D Fossil Fuel Fired Steam Generators.

The following emissions points are permitted under this emissions unit:

PROPOSED

The Coal Handling System (EP 01) 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.

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. 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 and the slaker systems (re-burned lime). No. 2 Lime Bin receives purchased lime by railcar or truck. Particulate matter emissions are controlled with a baghouse manufactured by Jet Air. 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 2-6 inches of H_2O pressure differential across the unit. An Air Pressure Pulse Jet system is used for bag cleaning.

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

PROPOSED

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.

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.

PROPOSED

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received May 23, 2011
Request for Additional Information dated July 19, 2011
Additional Information Response received October 17, 2011
Notice of Intent to Issue Air Permit issued January 5, 2012
Notice of Intent to Issue Air Permit issued June 8, 2012
Notice of Intent to Issue Air Permit issued July 16, 2012
Public Notice Published July 25, 2012

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

Changes that were made as part of this renewal (031-AV) include reformatting: Title V Permit format effective 10/28/2010, replacement of TV-6 with Appendix TV – Title V General Conditions dated 11/01/2010, Appendix TR – Facility-Wide Testing Requirements dated 9/12/2008, and Appendix RR – Facility-Wide Reporting Requirements dated 9/17/2009.

New Emission Units 038, 039, and 040 have been created to identify the three, diesel-fired stationary compression ignition internal combustion engines located onsite. All three engines are emergency fire pump engines.

PROPOSED

On April 5, 2012, the Department received comments on the Draft permit (issued January 5, 2012), from the consultant on behalf of the applicant. Based on these comments, the following changes were made to the draft Title V Permit Renewal:

1. Title Page – note that there is no space in "RockTenn". Please make this change throughout the permit.

   Response: The space in "Rock Tenn" has been removed from the Title Page and throughout the permit documents so that it now reads, "RockTenn".

2. There is no apparent reason to single out Subpart ZZZZ of Part 63 in the description at beginning of Subsection C. As shown in the table on this page, the facility is subject to other Part 63 standards as well. We request that the sentence related to Subpart ZZZZ in the description be deleted.

   Table- EU 006 is the No.5 Power Boiler. For the rows in the table referencing Part 61, Subparts A and E, add: "(when burning wastewater treatment sludge)." Add a row for EU 006 with the following: "40 CFR 63, Subpart S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (when burning NCGs regulated by Subpart S)."

   Response: Section I, Subsection C. Applicable Regulations. The sentence related to 40 CFR 63 Subpart ZZZZ has been deleted as requested from the description.

   Section I, Subsection C. Applicable Regulations, Table, Emissions Unit 006: For the rows in the table referencing Part 61, Subparts A and E, add: "(When burning wastewater treatment sludge)."

   The Department has added language as requested, but has maintained consistent terminology with that used in Subsection A of the draft permit (Emissions Unit 006):

40 CFR 61, Subpart A, NESHAP General Provisions	006 *(when wastewater wood fiber residuals are fired as fuel in this emissions unit)*
40 CFR 61, Subpart E-National Emission Standard for Mercury	006*(when wastewater wood fiber residuals are fired as fuel in this emissions unit)*

   The Department has added the following language to the Table in Subsection C of Section I of the draft permit:

40 CFR 63, Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry	006 *(when NCGs regulated by Subpart S are burned in this emissions unit),* 021, 024, 033

3. Section II, Facility-Wide Conditions, Condition FW6. Chemical Recovery Area: Change fourth sentence to "Purchased lime is stored in a lime bin with a baghouse." RockTenn can also receive lime via truck trailer, and is not limited to unloading for railcar only.

   Response: Based on the comment, the Facility-Wide Condition FW.6. is changed, consistent with the language presented in the submitted application, as follows:

PROPOSED

FW6. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

The following requirements are "not federally enforceable":

Woodyard

Chips are transported to the chip screening building and stacker/reclaimers on a covered conveyor. Sawdust and rejected chips from the screening process are transported by covered conveyor to the bark reclaimer. Sawdust and chips are removed from the conveyors and transfer points and placed onto the ground. The chips, sawdust, and other wood debris that escapes are collected with heavy equipment and placed in the bark reclaimer or the bark pile.

Pulping Area General

Chips are transported to the digester building on covered conveyors. Chips are transported to the Kamyr Digester in a blow line providing complete enclosure. Chips and fines that escape the transfer system are removed and then swept and carried to a chute where it is dumped to the ground or directly into a dumpster outside the digester building. The pile that is created is reclaimed into the bark system.

Chemical Recovery Area

Purchased lime is unloaded in a closed system and transferred to storage. ~~Kiln reburned~~ Reburned lime from the lime kiln is transferred in an enclosed elevator system to storage. Reburned lime is stored in a lime bin with a baghouse control. Purchased lime is stored in a lime bin with a baghouse ~~for railcar unloading~~ control. Lime piles are minimized by reclaiming as quickly as ~~practicable~~ possible and hauling off-site if necessary. ~~Moisture applications are~~ Water is applied when necessary to minimize fugitive dust emissions.

Facility

The particulate matter ~~on~~ from roadways and any storage piles ~~can be controlled from entrainment into the air~~ are minimized by ~~moisture~~ water applications~~,~~ ~~if~~ as necessary. Paved parking areas are maintained on-site for employee parking. Internal mill roadways are generally paved and speed limits are maintained. Vegetation and trees are maintained on the north and east perimeters of the facility to minimize as practicable windblown particulate~~s~~ emissions from these areas.

[Rule 62-296.320(4)(c)2., F.A.C.; Rule 62-213.440, F.A.C.]

PROPOSED

4. Section II, Facility-Wide Conditions, Condition FW10. Prevention of Accidental Releases (Section 112(r) of CAA): the facility ceased being covered by this rule on April 18, 2011, when it de-registered its on-site chlorine care storage. It is requested that the conditions be preceded by a statement that "At such time that the facility becomes subject to Section 112(r), the owner or operator shall comply with the following:"

   Response: Based on the comment, the Department has revised the condition language to reflect the Title V Permit format 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 to: 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]

Subsection A. Emissions Unit 006 – No. 5 Power Boiler

5. Section III, Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Brief Description. Currently states that "The ESP collected fly ash is injected into one of the No. 7 Power Boiler coal pulverizers and the boiler bottom ash to the wastewater treatment plant." Although the bottom ash is often sent to the wastewater treatment plant, this bottom ash is occasionally sent off site to a third-party landfill during periods of malfunction or when the wastewater treatment plant is shutdown. Request to change to "The ESP collected fly ash is injected into one of the No. 7 Power Boiler coal pulverizers and the boiler bottom ash is sent to the wastewater treatment plant or off-site landfill."

   Response: The sentence regarding the bottom ash has been changed as requested.

6. Section III, Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Brief Description. Condition A.2. specifically allows the burning of No. 2 fuel oil alone or in combination with other fuels. The current sentence in the description: "No. 2 fuel oil also may be fired in the boiler during startup only." is unclear. To clarify that the boiler is authorized to burn No. 2 fuel oil as already allowed in Alternative 3 of condition A.2., we request that this sentence be changed to read: "No. 2 fuel oil may also be fired in any combination with other permitted fuels or 100% No. 2 fuel oil."

   Response: The sentence has been changed as requested. In addition, this sentence is also changed in the No. 5 Power Boiler Emission Unit description in the Statement of Basis.

PROPOSED

7. Section III, Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Permitting Notes under Brief Description, Condition Nos. A.5.b., A.8.b, A.8.c, A.11, A.18., A.25.b.1., A.28.b.

The permitting notes refer to Rule 62—296.405 for Fossil Fuel Steam Generators. The No. 5 Power Boiler is a carbonaceous fuel burning boiler and is therefore subject to 62-296.410, and not to 62-296.405. The burning of fuel oil is specifically recognized for carbonaceous fuel-fired boilers under rule 62-296.410. RockTenn has researched similarly operated combination boilers and carbonaceous fuel fired boilers in the state, and found that they are not subject to 62-296.405. Therefore, RockTenn requests that the references to Rule 62-296.405 be removed throughout Subsection III.A.

Response: On February 27, 2006, the Department addressed a similar comment received from Mr. Warren S. Flenniken in a December 1, 2005 letter regarding the Draft Title V Operation Permit Renewal No. 0890003-009-AV. The submitted comment and Department response are repeated below in their entirety:

"Comment #16:

A.4, A.5, A.7, A.8, A.9, A.13, A.24 Please delete all references to Rule 62-296.405.

This rule applies to fossil fuel steam generators. The No. 5 Power Boiler is primarily a carbonaceous fuel-fired boiler, and is not a fossil fuel steam generator. See the definitions at Rule 62-210.200(56) and (120). The definition of carbonaceous fuel burning equipment explicitly recognizes that fossil fuels can be burned in addition to carbonaceous fuels. The previous construction permits for this boiler do not reference Rule 296.405. In addition, there are numerous carbonaceous/oil-fired boilers permitted around the state which are not regulated under 296.405.

As a result, soot blowing and load change provisions referenced in A.4.b.2., A.7.c., A.8.b.2., and A.13.c. are not applicable and should be deleted. The quarterly reporting requirements in A.24 should also be deleted since these requirements are based on 296.405.

As a related issue, there is no reason to have separate emission standards for alternative methods of operations 1 through 4. PM emissions are adequately covered in Condition A.4.a.- please delete A.4.b.1 and A.4.b.2. Also, please delete A.8.b.1. and A.13.b.

Response. In the Rule Applicability, Section II, of the Technical Evaluation and Preliminary Determination dated May 6, 1991, that was issued with the draft construction permit for the No. 5 Power Boiler, it is stated that the No. 5 PB is subject to the applicable provisions of …17-2.620(5)(a): Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input-Existing Sources; 17-2.600(10): Carbonaceous Fuel Burning Equipment… It was stated in the cover letter, that this version was a revised version to address the firing of No. 6 fuel oil at 100% in the boiler, the applicable emissions standards, and any monitoring and recording requirements. Furthermore, in a letter dated May 14, 1991, from Mr. Roger P. Hagan, Technical Department, to Mr. Clair Fancy, P.E., concerning Construction Permit No. AC45-194149, the following is stated in reference to Specific Condition No. 17 of the permit, "The purpose of this requirement, as we understand it, is to provide for the possibility that the boiler may be operated on fuel oil alone for reasons other than start-up, shutdown or malfunction, during which time it would be subject to the appropriate provisions of FAC and CFR relating to fossil fuel burning boilers."

If this boiler is being operated on fuel oil during times other than startup, shutdown, or malfunction, it appears that the requirements of Rule 62-296.405, F.A.C. are applicable. If this boiler is not being operated in this manner, then permit condition language should be added to clarify its operation."

A copy of the May 6, 1991 Technical Evaluation and May 14, 1991 letter is also attached. Based on this documentation, no change is made to the permit.

PROPOSED

8. Section III, Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Condition A.2. Table – for Alternative Method 4, specify "24-hr" as the averaging time, same as for the other listed fuels.

   Footnote 3 to table states "92,400 gallons per 24-hour period: 7AM – 7AM". Nowhere else in the permit is the 24-hour period defined. Although Smurfit-Stone previously defined an operating day as 7 am – 7 pm, RockTenn's operating day is defined as 6 am – 6 pm.

   Request footnote be changed to "92,400 gallons per 24-hour period".

   Response: Footnote 3 has been changed as requested.

9. Section III, Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Condition A.13. The federal NESHAP standard only applies when the boiler is burning wastewater treatment sludge. This condition should be revised to state this, for example, by changing the heading to: "Operation and Maintenance Requirements (only applicable when wastewater treatment sludge is burned)."

   Response: Based on the comment, while maintaining consistent terminology with that currently used in Subsection A of the draft permit, Condition A.13. is changed as follows:

   A.13. Operation and Maintenance Requirements- *Applicable when Wastewater wood fiber residuals are fired in Emissions Unit.* The owner or operator of each stationary source shall maintain and operate the source, including associated equipment for air pollution control, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operating and maintenance procedures, and inspection of the source.

   [40 CFR 61.12(c)]

   In addition based on this comment, the following has been added to Conditions A.14. and A.15. which are the operation and maintenance requirements of 40 CFR 63.6(e)(1) and excess emission requirements of 40 CFR 63.443(e)(1):

   - Applicable when Low volume, high concentration (LVHC) Noncondensible gases (NCG) subject to 40 CFR 63 Subpart S are fired in Emissions Unit.

   A.14. Operation and Maintenance Requirements- *Applicable when Low volume, high concentration (LVHC) Noncondensible gases (NCG) subject to 40 CFR 63 Subpart S are fired in Emissions Unit.*

   A.15. Excess Emissions – All Methods of Operation- *Applicable when Low volume, high concentration (LVHC) Noncondensible gases (NCG) subject to 40 CFR 63 Subpart S are fired in Emissions Unit.*

10. Section III, Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Condition A.21. The second sentence is not complete.

    Response: The second sentence is corrected as follows:

    A.21. SO_2 CEMS & Exhaust Flow Monitor Quality Assurance: The permittee shall follow the quality assurance procedures of 40 CFR Part 60, Appendix F. The required RATA tests for the SO_2 monitor shall be performed using EPA Method 6C in Appendix A of 40 CFR Part 60.

    [Construction Permit No. 0890003-018-AC, Appendix D]

PROPOSED

11. Section III, Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Condition A.27. The reference to Condition No. A.6 should instead reference Condition A.7.

    Response: The condition citation is corrected to A.7. as requested.

12. Section III, Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Condition A.29. Should Appendix TR be referenced under Test Methods and Procedures?

    Response: Based on the comment, a new Condition A.30. has been included in the permit as follows:

    A.30. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

    The remaining conditions within the Subsection have been renumbered accordingly.

13. Section III, Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Condition A.35. Should Conditions N.4 and N.5 also be referenced?

    Response: The Condition language in renumbered A.36. is changed, as requested, to reflect Conditions N.1.-N.5.

14. Section III, Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Condition A.36. Subsection J is specific for EU 033, and therefore does not represent Subpart S Common Conditions.

    Response: Based on the submitted comment, the condition has been removed from the draft Title V permit.

Subsection B. Emissions Unit 007 – No. 4 Recovery Boiler

15. Section III, Emissions Units and Specific Conditions, Subsection B. Emissions Unit 007, Condition B.2. 6th line down – reference to Condition J.2.1 should instead reference N.2.1.

    Response: The reference has been corrected, as requested, to Condition N.2.1.

16. Section III, Emissions Units and Specific Conditions, Subsection B. Emissions Unit 007, State Excess Emissions. The permitting note immediately under the heading should also reference Condition B.5.b., which relates to a state emission standard.

    Response: The State Excess Emissions Rule 62-210.700, F.A.C. has been removed from the draft permit. The No. 4 Recovery Boiler is subject to emissions standards in 40 CFR 63 Subpart MM. As such, the federal operational and maintenance standards of 40 CFR 63.6(e)(1) stated in Condition B.8. are applicable.

17. Section III, Emissions Units and Specific Conditions, Subsection B. Emissions Unit 007, Condition B.8. As requested for the No. 4 Recovery Boiler by RockTenn, this condition should allow up to 4 hours for excess emissions for SSM events, similar to the permit wording granted by FDEP for No. 5 Power Boiler. Although the excess emissions rule cannot vary any requirement of NESHAP, there are state emission limits which apply (Conditions B.5.b., B.6., and B.7.), to which the state excess emissions rule is applicable.

PROPOSED

Response: In RockTenn's correspondence dated October 14, 2011, RockTenn states, "*RockTenn recognizes that Rule 62-210.700 cannot vary or supersede any NSPS or NESHAP requirement regarding excess emissions. In light of the Department's requests, RockTenn has further reviewed its operations under startup and shutdown conditions. Based on this review, RockTenn is requesting additional time for excess emissions only for the No. 5 Power Boiler and No. 7 Power Boiler, and only in regards to particulate matter (PM), and opacity for No. 5 Power Boiler, and only for PM, opacity, nitrogen oxides (NOx), and oxygen (O2) for No. 7 Power Boiler. Although PM emissions are not normally measured during startup or shutdown periods, the fact that excess opacity does occur indicates that excess PM emissions could also occur…*"

In this correspondence, RockTenn provided the supporting data requested by the Department in its July 19, 2011 request for additional information only for the No. 5 Power Boiler and the No. 7 Power Boiler. Therefore, the Department limited its review as requested, for any proposed additional hours beyond the stated "up to 2 hours in any 24 hour period" in State Rule 62-210.700(1), F.A.C. to the No. 5 Power Boiler and the No. 7 Power Boiler only. For any other emissions unit where the State Rule 62-210.700(1), F.A.C. is applicable, the rule language is stated in the permit condition.

The No. 4 Recovery Boiler is subject to emissions standards in 40 CFR 63 Subpart MM. As such, the federal operational and maintenance standards of 40 CFR 63.6(e)(1) stated in Condition B.10. are applicable. The State Excess Emissions Rule 62-210.700, F.A.C. has been removed from the draft permit for this emissions unit.

18. Section III, Emissions Units and Specific Conditions, Subsection B. Emissions Unit 007, Condition B.11.d. Last sentence reads "For the purposes of compliance testing and certification of continuous emissions monitoring systems, 40 C.F.R. Part 60, Appendix A, Reference Method 16 and Method 16A, adopted by reference in Rule 62-204.800(7), F.A.C. are to be used."

    We request that this be changed to "For the purposes of compliance testing and certification of continuous emissions monitoring systems, 40 C.F.R. Part 60, Appendix A, Reference Method 16, Method 16A, and Method 16B adopted by reference in Rule 62-297.401(16), or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 (March 24, 2010), 40 Fed Reg. at p. 9779 (Feb. 22, 2011)) approved by the Department pursuant to Rule 62-297.620, are to be used."

    The regulatory reference should be to 62-204.800(8), F.A.C., which is the reference to 40 CFR Part 60.

    Response: The language in Condition B.11.d. is from Rule 62-296.404(5)(b)1.d., F.A.C . The rule states that Method 16 or 16A shall be required for compliance testing and instrument certification.

    Rule 62-296.404(5)(b)1.d., F.A.C. "*… For the purposes of compliance testing and certification of continuous emissions monitoring systems, 40 C.F.R. Part 60, Appendix A, Reference Method 16 and Method 16A, adopted by reference in subsection 62-204.800(7), F.A.C., are to be used.*"

    The Division has approved the use of Method 16B for instrument certification and compliance testing.

    The alternative to Method 16A was approved by EPA in their Alternative Method Decision Letter No. ALT-071 on March 24, 2010 for use at any facility subject to 40 CFR 60 Subpart BB (Kraft pulp mills) or J (petroleum refineries). This emissions unit is not subject to 40 CFR 60 Subpart BB, however, EPA states in Federal Register Vol. 75, No. 170 / Thursday, September 2, 2010 / Proposed

PROPOSED

Rules that Method 16C may be applicable to other sources regulated by State and local regulations that specify the use of Methods 16, 16A, or 16B if desired.

The Department approved this alternative method for facilities subject to State Rule 62-296.404, F.A.C. in a letter to the Florida Pulp and Paper Association Environmental Affairs, Inc. dated May 15, 2012.

Note that this alternative method has not been approved by Department Order pursuant to Rule 62-297.620, F.A.C.

Based on the comment, renumbered Condition B.9.d. and B.9.f. are changed as follows:

B.9. Total Reduced Sulfur (TRS). The permittee shall calibrate, certify, and operate a total reduced sulfur continuous emissions monitoring system pursuant to all of the following provisions:

d. The continuous emissions monitoring system shall be located, installed and certified pursuant to the provisions of 40 C.F.R. Part 60, Appendix B, Performance Specification 2 and Performance Specification 3, and 40 C.F.R. Part 60, Appendix B, Performance Specification 5, which are adopted by reference in Rule 62-204.800(7), F.A.C. The exception is that the phrase "or other approved alternative" in ~~s.~~ Section 3.2 of Performance Specification 5 is not adopted. For the purposes of compliance testing and certification of continuous emissions monitoring systems, 40 C.F.R. Part 60, Appendix A, Reference Method 16, ~~and~~ Method 16A, or Method 16B, adopted by reference in Rule 62-204.800(~~7~~8), F.A.C., or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010), are to be used.

f. During any such times as there is reason to believe the system does not conform to the performance specifications under this rule (for example, equipment repairs, replacements, excessive drift and such), the owner or operator of any affected emissions unit shall conduct continuous monitoring system performance evaluations and furnish the Department, within sixty days thereof, two copies of a written report of the results of such tests. These continuous emissions monitoring systems performance evaluations shall be conducted in accordance with the requirements and procedures contained in Rule 62-296.404(5)(b)1.d., F.A.C.

[Rule 62-296.404(5)(b)~~(1)~~.a.,b.,c.,d.,e.,f.,g.(i),h., F.A.C. .; EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010; FDEP Letter dated May 15, 2012; Rule 62-204.800(8)(e)6.,F.A.C.]

19. Section III, Emissions Units and Specific Conditions, Subsection B. Emissions Unit 007, Condition B.21.a.: This condition does not currently allow for an alternative to EPA Method 16B., it is requested that the condition read as follows:

The test method for TRS shall be EPA Method 16, EPA Method 16A, or EPA Method 16B, incorporated and adopted by reference in Chapter 62-297,F.A.C. A compliance test shall be conducted once every five years, during the federal fiscal year. EPA Method 16, Method 16A, and Method 16B adopted by reference in Rule 62-297.401(16), or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 (March 24, 2010), 40 Fed Reg. at p. 9779 (Feb. 22, 2011)) approved by the Department pursuant to Rule 62-297.620, shall be required for instrument certification and compliance testing.

PROPOSED

To be consistent, we also request that the reference to 5-yr testing consistent be changed, as shown above.

Response: The language in Condition B.21.a. is consistent with the language in Rule 62-296.404(4)(a)3., F.A.C. The rule states that Method 16 or 16A shall be required for compliance testing and instrument certification.

Rule 62-296.404(4)(a)3., F.A.C. *"The test method for TRS shall be EPA Method 16 or EPA Method 16A or EPA Method 16B, incorporated and adopted by reference in Chapter 62-297, F.A.C. EPA Method 16 or EPA Method 16A pursuant to subsection 62-297.401(16), F.A.C., shall be required for instrument certification and compliance testing."*

The Division has approved the use of Method 16B for instrument certification and compliance testing.

The alternative to Method 16A was approved by EPA in their Alternative Method Decision Letter No. ALT-071 on March 24, 2010 for use at any facility subject to 40 CFR 60 Subpart BB (Kraft pulp mills) or J (petroleum refineries). This emissions unit is not subject to 40 CFR 60 Subpart BB, however, EPA states in Federal Register Vol. 75, No. 170 / Thursday, September 2, 2010 / Proposed Rules that Method 16C may be applicable to other sources regulated by State and local regulations that specify the use of Methods 16, 16A, or 16B if desired.

The Department approved this alternative method for facilities subject to State Rule 62-296.404, F.A.C. in a letter to the Florida Pulp and Paper Association Environmental Affairs, Inc. dated May 15, 2012.

Note that this alternative method has not been approved by Department Order pursuant to Rule 62-297.620, F.A.C.

The requirement to conduct compliance testing on a 5-year basis is based on Rule 62-297.310(7)(a)3., F.A.C., which states, *"the owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision."*

As such, based on the comment, renumbered Condition B.19.a. is changed as follows:

B.19.a. Total Reduced Sulfur (TRS). The test method for TRS shall be EPA Method 16, EPA Method 16A, or EPA Method 16B, incorporated and adopted by reference in Chapter 62-297, F.A.C., or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010). A compliance test that demonstrates compliance with the applicable emission limiting standard shall be conducted prior to obtaining a renewed operation permit ~~operation permit renewal~~. The most recent compliance test shall be submitted, provided such test occurred within the 12 months prior to permit renewal. EPA Method 16, ~~or~~ EPA Method 16A, or EPA Method 16B pursuant to Rule 62-297.401(16), F.A.C., or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010), shall be required for instrument certification and compliance testing.

[Rule 62-296.404(4)(a)3., F.A.C.; Rule 62-297.~~401~~310(7)(a)3.,F.A.C.; Rule 62-204.800(8)(e)6., F.A.C.; EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010; FDEP Letter dated May 15, 2012]

PROPOSED

20. Section III, Emissions Units and Specific Conditions, Subsection B. Emissions Unit 007, Condition B.21.: Should Appendix TR be referenced under Test Methods and Procedures?

    Response: Based on the comment, a new Condition B.20. has been included in the permit as follows:

    B.20. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

    [Rule 62-297.310, F.A.C.]

    The remaining conditions within the Subsection have been renumbered accordingly.

21. Section III, Emissions Units and Specific Conditions, Subsection B. Emissions Unit 007, Condition B.23.(2)(ii). The reference to Condition B.15 should instead be to Condition B.13.

    Response: The reference to has been corrected to a renumbered Condition B.11.

22. Section III, Emissions Units and Specific Conditions, Subsection B. Emissions Unit 007, Condition B.24. PSD Emissions Tracking – NOx Emissions: Currently states that "…the owner or operator shall estimate the NOx emissions based on the procedures described in Appendix HCE, and report the emissions annually." Condition 4 of Appendix HCE requires that "This information (NOx emissions) shall be reported for a 5-year period following the addition of HCE in accordance with the terms of Construction Permit No. 0890003-013-AC (i.e. calendar years 2008 to 2012)."

    Request that this wording be changed to reflect the 5-year reporting requirement of Appendix HCE. "…the owner or operator shall estimate the NOx emissions based on the procedures described in Appendix HCE, and report eh emissions annually, for the period 2008 to 2012."

    Response: The requirement for annual NOx emissions reporting in Condition 4 of Appendix HCE is based on Rule 62-212.300(3)(e)1., F.A.C., which requires for any Department issued construction permit which avoids the requirements of Rule-212.400(4) through (12), F.A.C., based in whole or in part on projected actual emissions calculations, that the permittee 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, to calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change.

    The Department files indicate that four such NOx annual emissions reports were submitted for years 2008, 2009, 2010, and 2011. Thus a fifth report is expected for year 2012.

    Based on the comment, the renumbered Condition B.23., is changed as follows:

    B.23. PSD Emissions Tracking – NO_x Emissions: To ensure that the addition of HCE authorized by Permit No. 0890003-013-AC will not constitute a major modification, the owner or operator shall ~~estimate the~~ calculate and maintain a record of NO_x emissions in tons per year, on a calendar year basis, for a period of 5 years following resumption of regular operations after the addition of HCE as authorized by Permit No. 0890003-013-AC. The owner or operator shall follow ~~based on~~ the procedures described in Appendix HCE, and provide a written report to the Department on an annual basis for this same 5-year period. ~~emissions annually~~.

    [Permit No.0890003-013-AC, Rule 62-212.400(12)(c), F.A.C.; Rule 62-212.300(3)(e)1.,F.A.C.]

PROPOSED

Subsection C. Emissions Unit 011 – No. 5 Recovery Boiler

23. Section III, Emissions Units and Specific Conditions, Subsection C. Emissions Unit 011, Condition C.2. The reference to Condition J.2.1 should instead be to Condition N.2.1.

    Response: The reference to Condition N.2.1. has been corrected as requested.

24. Section III, Emissions Units and Specific Conditions, Subsection C. Emissions Unit 011,Condition C.4. The second C.4 condition should be renumbered C.5, and all subsequent conditions renumbered accordingly.

    Response: The conditions beginning with the second C.4. have been renumbered accordingly.

25. Section III, Emissions Units and Specific Conditions, Subsection C. Emissions Unit 011, Condition C.8. RockTenn requested that excess emissions be allowed for up to 4 hours during startup conditions. This request does not contravene the federal requirements under 40 CFR 63 Subpart A.

    Response: Please refer to the Department's response in Item 17. The No. 5 Recovery Boiler is subject to 40 CFR 60 Subpart BB and 40 CFR 63 Subpart MM. The excess emissions are defined by these subparts and the General Provisions, specifically 40 CFR 60.11(d) and 40 CFR 63.6(e)(1) as stated in the draft permit.

26. Section III, Emissions Units and Specific Conditions, Subsection C. Emissions Unit 011, Condition C.14. The reference to Condition C.28. should instead be to Condition C.29.

    Response: The reference to Condition C.29. has been corrected to a renumbered C.37.

27. Section III, Emissions Units and Specific Conditions, Subsection C. Emissions Unit 011, Condition C.15. The reference to Condition C.4 should instead be to Condition C.5.

    Response: The reference to Condition C.5. has been corrected as requested.

28. Section III, Emissions Units and Specific Conditions, Subsection C. Emissions Unit 011, Condition C.21.a. The reference to Conditions C.5 and C.6 should instead be to Conditions C.6 and C.7.

    Response: The references to Condition C.6. and C.7. have been corrected as requested.

29. Section III, Emissions Units and Specific Conditions, Subsection C. Emissions Unit 011, Condition C.21.a.(1) : We request that the reference to 5-yr testing be consistent. The conditions reads "… a compliance test shall be conducted once every five years, prior to operation permit renewal." We request that this be change to "A compliance test shall be conducted once every five years, during the federal fiscal year."

    Response: The requirement to conduct compliance testing on a 5-year basis is based on Rule 62-297.310(7)(a)3., F.A.C., which states, "*the owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision.*"

    As such, based on the comment, the condition, now Condition C.24.(1) is changed as follows:

    C.24. Total Reduced Sulfur (TRS). The owner or operator shall determine compliance with the TRS standards in Condition Nos. C.6. and C.7. as follows:

PROPOSED

(1) Method 16 shall be used to determine the TRS concentration. As an alternative to Method 16, Method 16A or 16B may be used. The TRS concentration shall be corrected to the appropriate oxygen concentration using the procedure in Condition C.19. The sampling time shall be at least 3 hours, but no longer than 6 hours. A compliance test shall be conducted annually, once each federal fiscal year when the recovery boiler has been operated in Cross Recovery Furnace Operation Mode during the given year. Otherwise, a compliance test shall be conducted ~~once every five years,~~ prior to obtaining a renewed operation permit ~~renewal~~. The most recent compliance test shall be submitted, provided such test occurred within the 12 months prior to permit renewal.

In addition, Rule 62-297.310(7)(a)3., F.A.C. is included in the condition rule citations.

30. Section III, Emissions Units and Specific Conditions, Subsection C. Emissions Unit 011, Condition C.21.: Should Appendix TR be referenced under Test Methods and Procedures?

Response: Based on the comment, a new Condition C.26. has been included in the permit as follows:

C.26. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

[Rule 62-297.310, F.A.C.]

The remaining conditions within the Subsection have been renumbered accordingly.

31. Section III, Emissions Units and Specific Conditions, Subsection C. Emissions Unit 011, Condition C.23. PSD Emissions Tracking – NOx Emissions: Currently states that "…the owner or operator shall estimate the NOx emissions based on the procedures described in Appendix HCE, and report the emissions annually." Condition 4 of Appendix HCE requires that "This information (NOx emissions) shall be reported for a 5-year period following the addition of HCE in accordance with the terms of Construction Permit No. 0890003-013-AC (i.e. calendar years 2008- 2012)."

Request that this wording be changed to reflect the 5-year reporting requirement of Appendix HCE. "…the owner or operator shall estimate the NOx emissions based on the procedures described in Appendix HCE, and report the emissions annually, for the period 2008 to 2012."

Response: Please refer to the response to Item 22.

Based on the comment, Condition C.23., now renumbered as C.29., is changed as follows:

C.29. PSD Emissions Tracking – NO_x Emissions: To ensure that the addition of HCE authorized by Permit No. 0890003-013-AC will not constitute a major modification, the owner or operator shall ~~estimate the~~ calculate and maintain a record of NO_x emissions in tons per year, on a calendar year basis, for a period of 5 years following resumption of regular operations after the addition of HCE as authorized by Permit No. 0890003-013-AC. The owner or operator shall follow ~~based on~~ the procedures described in Appendix HCE, and provide a written report to the Department on an annual basis for this same 5-year period. ~~emissions annually~~.

[Permit No.0890003-013-AC, Rule 62-212.400(12)(c), F.A.C.; Rule 62-212.300(3)(e)1.,F.A.C.]

PROPOSED

Subsection D. Emissions Unit 013 – No. 4 Smelt Dissolving Tank

32. Section III, Emissions Units and Specific Conditions, Subsection D. Emissions Unit 013, Condition D.7. Should read "are conditionally allowed for up to 2 **hours** in any 24-hour period…"

    Response: The State Excess Emissions Rule 62-210.700, F.A.C. has been removed from the draft permit for this emissions unit. The No. 4 Smelt Dissolving Tank subject to 40 CFR 63 Subpart MM and Rule 62-294.404, F.A.C. The excess emissions are defined by Subpart MM and the General Provisions, specifically 40 CFR 60.11(d), and the State rule.

33. Section III, Emissions Units and Specific Conditions, Subsection D. Emissions Unit 013, Condition D.16. The reference to Condition D.3 should instead be to Condition D.4.

    Response: The reference to Condition D.4. has been corrected as requested.

34. Section III, Emissions Units and Specific Conditions, Subsection D. Emissions Unit 013, Condition D.21.: this condition currently reads: "The test method for total reduced sulfur shall be EPA Method 16, or 16A incorporated and adopted by reference in Chapter 62-297, F.A.C. A compliance test shall be conducted prior to permit renewal during the federal fiscal year."

    We request the following wording instead:

    The test method for TRS shall be EPA Method 16, EPA Method 16A, or EPA Method 16B, incorporated and adopted by reference in Chapter 62-297, F.A.C. or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 (March 24, 2010), 40 Fed Reg. at p. 9779 (Feb. 22, 2011)) approved by the Department pursuant to Rule 62-297.620. A compliance test shall be conducted once every five years, during the federal fiscal year.

    Response: The language in Condition D.21. is consistent with the language in Rule 62-296.404(4)(c)3., F.A.C. The rule states that Method 16 or 16A shall be required for compliance testing and instrument certification.

    Rule 62-296.404(4)(c)3., F.A.C. *"The test method for TRS shall be EPA Method 16 or EPA Method 16A or EPA Method 16B, incorporated and adopted by reference in Chapter 62-297, F.A.C. EPA Method 16 or EPA Method 16A pursuant to subsection 62-297.401(16), F.A.C., shall be required for instrument certification and compliance testing."*

    The Division has approved the use of Method 16B for instrument certification and compliance testing.

    The alternative to Method 16A was approved by EPA in their Alternative Method Decision Letter No. ALT-071 on March 24, 2010 for use at any facility subject to 40 CFR 60 Subpart BB (Kraft pulp mills) or J (petroleum refineries). This emissions unit is not subject to 40 CFR 60 Subpart BB, however, EPA states in Federal Register Vol. 75, No. 170 / Thursday, September 2, 2010 / Proposed Rules that Method 16C may be applicable to other sources regulated by State and local regulations that specify the use of Methods 16, 16A, or 16B if desired.

    The Department approved this alternative method for facilities subject to State Rule 62-296.404, F.A.C. in a letter to the Florida Pulp and Paper Association Environmental Affairs, Inc. dated May 15, 2012.

    Note that this alternative method has not been approved by Department Order pursuant to Rule 62-297.620, F.A.C.

PROPOSED

The requirement to conduct compliance testing on a 5-year basis is based on Rule 62-297.310(7)(a)3., F.A.C., which states, "*the owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision.*"

As such, based on the comment, the Condition, renumbered to D.19., is changed as follows:

D.19. TRS Emissions. The test method for total reduced sulfur shall be EPA Method 16, or EPA Method 16A or EPA Method 16B, incorporated and adopted by reference in Chapter 62-297, F.A.C., or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010). EPA Method 16, EPA Method 16A, or EPA Method 16B pursuant to subsection 62-297.401(16), F.A.C., or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010), shall be required for instrument certification and compliance testing.

A compliance test that demonstrates compliance with the applicable emission limiting standard shall be conducted prior to obtaining a renewed operation permit ~~operation permit renewal during the federal fiscal year~~. The most recent compliance test shall be submitted, provided such test occurred within the 12 months prior to permit renewal.

[Rules 62-296.404(4)(c)3., 62-297.310(7)(a)3., 62-297.310(7)(a)4.b., F.A.C., Rules 62-297.401(16) and (16)(a), F.A.C.; EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010; FDEP Letter dated May 15, 2012; Rule 62-204.800(8)(e)6.,F.A.C.; Construction Permit No. AC45-141875, Amendment dated May 26, 1988, Construction Permit No. 0890003-010-AC; Operation Permit No. AO45-184171]

35. Section III, Emissions Units and Specific Conditions, Subsection D. Emissions Unit 013, Should Appendix TR be referenced under Test Methods and Procedures?

    Response: Based on the comment, a new Condition D.20. has been included in the permit as follows:

    D.20. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

    The remaining conditions within the Subsection have been renumbered accordingly.

36. Section III, Emissions Units and Specific Conditions, Subsection D. Emissions Unit 013, Condition D.28(3). The reference to Condition D.12 should instead be to Condition D.13.

    Response: The reference has been corrected to a renumbered Condition D.11.

37. Section III, Emissions Units and Specific Conditions, Subsection D. Emissions Unit 013, Condition D.33.: This condition related to on-spec used oil is not applicable to the No. 4 Smelt Dissolving Tank.

    Response: This condition has been removed as requested.

PROPOSED

Subsection E. Emissions Unit 014 – No. 5 Smelt Dissolving Tank

38. Section III, Emissions Units and Specific Conditions, Subsection E. Emissions Unit 014, Condition E.2. Remove (24-hour average) reference. Not applicable to allowable operating hours/year.

    Response: The "24-hour average" has been removed as requested.

39. Section III, Emissions Units and Specific Conditions, Subsection E. Emissions Unit 014, Condition E.19.a.: We request that the reference to 5-yr testing be consistent. The current condition reads "A compliance test shall be conducted prior to permit renewal during the federal fiscal year." We request that this be changed to "A compliance test shall be conducted once every five years, during the federal fiscal year."

    Response: The requirement to conduct compliance testing on a 5-year basis is based on Rule 62-297.310(7)(a)3., F.A.C., which states, *"the owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision."*

    As such, based on the comment, a renumbered Condition E.18.a. is changed as follows:

    E.18.a. Total Reduced Sulfur (TRS). The owner or operator shall determine compliance with the TRS standards in Condition E.5. as follows. A compliance test shall be conducted prior to obtaining a renewed operation permit. The most recent compliance test shall be submitted, provided such test occurred within the 12 months prior to permit renewal ~~during the federal fiscal year~~:

40. Section III, Emissions Units and Specific Conditions, Subsection E. Emissions Unit 014, Condition E.19.b. Total Reduced Sulfur (TRS): This condition currently reads: "The owner or operator may use as an alternative to Method 16, specified in Condition E.19.a., Method 16A or 16B. Pursuant to Rule 62-297.401(16), F.A.C., EPA Method 16 or EPA Method 16A shall be required for instrument certification and compliance testing.

    We request the following wording instead:

    The test method for TRS shall be EPA Method 16, EPA Method 16A, or EPA Method 16B, incorporated and adopted by reference in Chapter 62-297, F.A.C. A compliance test shall be conducted once every five years, during the federal fiscal year. EPA Method 16, Method 16A, and Method 16B adopted by reference in Rule 62-297.401(16), or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 (March 24, 2010), 40 Fed Reg. at p. 9779 (Feb. 22, 2011)) approved by the Department pursuant to Rule 62-297.620, shall be required for instrument certification and compliance testing.

    Response: The language in Condition E.19.b. is consistent with the language in Rule 62-296.404(4)(c)3., F.A.C. The rule states that Method 16 or 16A shall be required for compliance testing and instrument certification.

    Rule 62-296.404(4)(c)3., F.A.C., *"The test method for TRS shall be EPA Method 16 or EPA Method 16A or EPA Method 16B, incorporated and adopted by reference in Chapter 62-297, F.A.C. EPA Method 16 or EPA Method 16A pursuant to subsection 62-297.401(16), F.A.C., shall be required for instrument certification and compliance testing."*

PROPOSED

However, upon further review since the emissions unit is subject to 40 CFR 60 Subpart BB, which states in §60.285(f)(2) that EPA Methods 16A and 16B may be used as alternatives to EPA Method 16, the Department shall remove this requirement from the permit condition.

The alternative to Method 16A was approved by EPA in their Alternative Method Decision Letter No. ALT-071 on March 24, 2010 for use at any facility subject to 40 CFR 60 Subpart BB (Kraft pulp mills) or J (petroleum refineries). The Department approved this method for facilities subject to 40 CFR 60, Subpart BB in a letter to the Florida Pulp and Paper Association Environmental Affairs, Inc. dated May 15, 2012.

Note that this alternative method has not been approved by Department Order pursuant to Rule 62-297.620, F.A.C.

As such, based on the comment, a renumbered Condition E.18.b. is changed as follows:

E.18.b. Total Reduced Sulfur (TRS). The owner or operator may use as an alternative to EPA Method 16, specified in Condition E.19.a., EPA Method 16A, ~~or~~ EPA Method 16B, or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010). ~~Pursuant to Rule 62-297.401(16), F.A.C., EPA Method 16 or EPA Method 16A shall be required for instrument certification and compliance testing.~~

[40 CFR 60.285(f)(2); Rule 62-297.401(16) and (16)(a), F.A.C.; Rule 62-296.404(4)(c)3., F.A.C.(subsumed); Rule 62-204.800(8)(e)6., F.A.C.; EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010; FDEP Letter dated May 15, 2012; Construction Permit No. 0890003-016-AC]

41. Section III, Emissions Units and Specific Conditions, Subsection E. Emissions Unit 014, Condition E.21.: Should Appendix TR be referenced under Test Methods and Procedures?

Response: Based on the comment, a new Condition E.21. has been included in the permit as follows:

E.21. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

The remaining conditions within the Subsection have been renumbered accordingly.

42. Section III, Emissions Units and Specific Conditions, Subsection E. Emissions Unit 014, Condition E.27. The reference to Condition E.11 should instead be to Condition E.13.

Response: The reference to in Condition E.27.(3) has been corrected as follows:

(3) Records of parameter monitoring data required under Conditions E.11.a. and E.11.b. ~~E.11.~~, including any period when the operating parameter levels were inconsistent with the levels established during the initial performance test, with a brief explanation of the cause of the deviation, the time the deviation occurred, the time corrective action was initiated and completed, and the corrective action taken;

PROPOSED

Subsection F. Emissions Unit 015 – No. 7 Power Boiler

43. Section III, Emissions Units and Specific Conditions, Subsection F. Emissions Unit 015, Brief Description. Last sentence of 3rd paragraph should read "PM emissions from the Ash Handling System are controlled by **a fabric filter**."

    Response: The last sentence of the 3rd paragraph has been correct to reflect that PM emissions from the Ash Handling System are controlled by "a fabric filter" instead of "fabric filters", as requested.

44. Section III, Emissions Units and Specific Conditions, Subsection F. Emissions Unit 015, Condition F.13. RockTenn requested that excess emissions be allowed for up to 4.5 hour during startup conditions. This request does not contravene the federal requirements under 40 CFR Part 60 Subpart A.

    Response: Please refer to the Department's response in Item 17. The No. 7 Power Boiler is subject to 40 CFR 60 Subpart D, and Prevention of Significant Deterioration of Rule 62-212.400, F.A.C. As such, any excess emission requirements under this federal regulation and the General Provisions of 40 CFR 60 Subpart A, including 40 CFR 60.11(d) are applicable.

45. Section III, Emissions Units and Specific Conditions, Subsection F. Emissions Unit 015, Condition F.22. F.22. Currently states "Dust suppression systems shall be used in the coal preparation and handling facilities which includes: a) a bottom discharge system employing side curtain and surfactant spray for coal unloading operations; b) housing the coal crusher in the power boiler building; c) surfactants control in conjunction with the coal pile; and d) covered conveyors to transport the coal." Specific Condition F.31 requires annual VE testing of the coal preparation and handling system and silos vent. Furthermore, there is no longer an outside coal pile, but rather coal silos.

    Request change to "Dust suppression systems shall be used in the coal preparation and handling facilities which **may** include: a) a bottom discharge system employing side curtain and surfactant spray for coal unloading operations; b) housing the coal crusher in the power boiler building; c) surfactants control in conjunction with the coal pile; and d) covered conveyors to transport the coal."

    Response: Please note that this condition language comes from Specific Condition No. 12 of Air Construction Permit No. AC45- 35532 issued March 12, 1981. At the time the No. 7 Power Boiler was originally permitted, EPA Region 4 processed preconstruction review permits for the Prevention of Significant Deterioration (PSD) of Air Quality for the State of Florida. EPA issued Permit No. PSD-FL-062 on April 13, 1981. It appears that a 7.2 ton per year particulate matter emissions estimate for the coal handling facility was used as part of the BACT determination. An application for an air construction permit, including publication of a public notice would be required. The application should include an emissions analysis showing the change as a result of the request.

46. Section III, Emissions Units and Specific Conditions, Subsection F. Emissions Unit 015, Condition F.30. Should Appendix TR be referenced under <u>Test Methods and Procedures</u>?

    Response: Based on the comment, a new Condition F.34. has been included in the permit as follows:

PROPOSED

F.34. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

[Rule 62-297.310, F.A.C.]

The remaining conditions within the Subsection have been renumbered accordingly.

Subsection G. Emissions Unit 020 – Tall Oil Plant

47. Section III, Emissions Units and Specific Conditions, Subsection G. Emissions Unit 020, Condition G.8. Total Reduced Sulfur (TRS). This condition reads "The test method for TRS shall be either EPA Method 16 or 16A as incorporated and adopted by reference in Chapter 62-297, F.A.C. EPA Method 16 or EPA Method 16A, pursuant to Rule 62-297.401(16), F.A.C., shall be required for instrument certification and compliance testing. A compliance test shall be conducted once every 5 years, prior to operation permit renewal."

    We request the following wording instead:

    The test method for TRS shall be EPA Method 16, EPA Method 16A, or EPA Method 16B, incorporated and adopted by reference in Chapter 62-297, F.A.C. A compliance test shall be conducted once every five years, during the federal fiscal year. EPA Method 16, Method 16A, and Method 16B adopted by reference in Rule 62-297.401(16), or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 (March 24, 2010), 40 Fed Reg. at p. 9779 (Feb. 22, 2011)) approved by the Department pursuant to Rule 62-297.620, shall be required for instrument certification and compliance testing.

    Response: The language in Condition G.8. is based on the language in Rule 62-296.404(4)(d), F.A.C. The rule states that Method 16 or 16A shall be required for compliance testing and instrument certification.

    Rule 62-296.404(4)(d), F.A.C. "*The TRS test method for tall oil plants shall be EPA Method 16 or EPA Method 16A or EPA Method 16B, incorporated and adopted by reference in Chapter 62-297, F.A.C. EPA Method 16 or EPA Method 16A pursuant to subsection 62-297.401(16), F.A.C., shall be required for instrument certification and compliance testing.*"

    The Division has approved the use of Method 16B for instrument certification and compliance testing.

    The alternative to Method 16A was approved by EPA in their Alternative Method Decision Letter No. ALT-071 on March 24, 2010 for use at any facility subject to 40 CFR 60 Subpart BB (Kraft pulp mills) or J (petroleum refineries). This emissions unit is not subject to 40 CFR 60 Subpart BB, however, EPA states in Federal Register Vol. 75, No. 170 / Thursday, September 2, 2010 / Proposed Rules that Method 16C may be applicable to other sources regulated by State and local regulations that specify the use of Methods 16, 16A, or 16B if desired.

    The Department approved this alternative method for facilities subject to State Rule 62-296.404, F.A.C. in a letter to the Florida Pulp and Paper Association Environmental Affairs, Inc. dated May 15, 2012.

    Note that this alternative method has not been approved by Department Order pursuant to Rule 62-297.620, F.A.C.

PROPOSED

The requirement to conduct compliance testing on a 5-year basis is based on Rule 62-297.310(7)(a)3., F.A.C., which states, "*the owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision.*"

As such, based on the comment, the Condition, renumbered to G.6. is changed as follows:

G.6. Total Reduced Sulfur (TRS). The test method for TRS shall be either EPA Method 16 or EPA Method 16A or EPA Method 16B as incorporated and adopted by reference in Chapter 62-297, F.A.C., or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010). EPA Method 16, ~~or~~ EPA Method 16A, or EPA Method 16B, pursuant to Rule 62-297.401(16), F.A.C., or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010), shall be required for instrument certification and compliance testing. A compliance test that demonstrates compliance with the applicable emission limiting standard shall be conducted prior to obtaining a renewed operation permit ~~every 5 years, prior to permit renewal~~. The most recent compliance test shall be submitted, provided such test occurred within the 12 months prior to permit renewal.

[Rule 62-296.404(4)(d), F.A.C.; Rule 62-297.310(7)(a)3., F.A.C.; Rule 62-204.800(8)(e)6., F.A.C.; EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010; FDEP Letter dated May 15, 2012; Construction Permit No. AC45-141874; Amendment dated May 26, 1988; Operation Permit No. AO45-166568]

48. Section III, Emissions Units and Specific Conditions, Subsection G. Emissions Unit 020. Should Appendix TR be referenced under Test Methods and Procedures?

    Response: Based on the comment, a new Condition G.7. has been included in the permit as follows:

    G.7. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

    [Rule 62-297.310, F.A.C.]

    The remaining conditions within the Subsection have been renumbered accordingly.

49. Section III, Emissions Units and Specific Conditions, Subsection G. Emissions Unit 020, Condition G.9.(d). The reference to Condition G.6(c)1 through 3 should instead be to Condition G.9.(c).

    Response: The reference has been corrected to G.8.(c).

Subsection H. Emissions Unit 021 – No. 4 Lime Kiln

50. Section III, Emissions Units and Specific Conditions, Subsection H. Emissions Unit 021, Condition H.9. Change "Particulate Metter emissions shall not …" to "Particulate Matter emissions shall not …

    Response: The typo is corrected to read, "Particulate Matter".

PROPOSED

51. Section III, Emissions Units and Specific Conditions, Subsection H. Emissions Unit 021, Condition H.11. Change "Particulate Metter emissions shall not …" to "Particulate Matter emissions shall not …"

    Response: The typo is corrected to read, "Particulate Matter".

52. Section III, Emissions Units and Specific Conditions, Subsection H. Emissions Unit 021, Condition H.13. RockTenn requested that excess emissions be allowed for up to 12 hours during startup conditions. This request does not contravene the federal requirements under 40 CFR Part 60, Subpart A. Excess emissions for greater than two hours during startup were granted for the No. 5 Power Boiler. RockTenn requests that the No. 4 Lime Kiln be granted up to 12 hours.

    Response: Please refer to the Department's response in Item 17. The No. 4 Lime Kiln is subject federal regulations, 40 CFR 60 Subpart BB, 40 CFR 63 Subpart S, and 40 CFR 63 Subpart MM. As such, any excess emission requirements under these federal regulations and the General Provisions of 40 CFR 60 Subpart A (including section 60.11(d)), and 40 CFR 63 Subpart A , including section 63.6(e)(1)), are applicable. The State Excess Emissions Rule continues to be applied to the Nos. 1 and 2 Lime Bin Vents and the Lime Handling System.

53. Section III, Emissions Units and Specific Conditions, Subsection H. Emissions Unit 021, Condition H.28. Total Reduced Sulfur (TRS). This condition reads "EPA Method 16 or 16A shall be used to determine the TRS concentration. The TRS concentration shall be corrected to the appropriate oxygen concentration using the procedure in Condition H.21.(3). The sampling time shall be at least 3 hours, but no longer than 6 hours. A compliance test shall be conducted annually, once each federal fiscal year."

    We request the following wording instead:

    The test method for TRS shall be EPA Method 16, EPA Method 16A, or EPA Method 16B, incorporated and adopted by reference in Chapter 62-297, F.A.C or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 (March 24, 2010), 40 Fed Reg. at p. 9779 (Feb. 22, 2011)) approved by the Department pursuant to Rule 62-297.620. A compliance test shall be conducted annually, once each federal fiscal year.

    Response: The language in Condition H.28. is based on the language in 40 CFR 60 Subpart BB (40 CFR 60.285(d)(1); 40 CFR 60.285(f)).

    40 CFR 60.285(d)(1), *" Method 16 shall be used to determine the TRS concentration. The TRS concentration shall be corrected to the appropriate oxygen concentration using the procedure in §60.284(c)(3). The sampling time shall be at least 3 hours, but no longer than 6 hours."*

    40 CFR 60.285(f), *"The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:*

    (2) In place of Method 16, Method 16A or 16B may be used."

    The alternative to Method 16A was approved by EPA in their Alternative Method Decision Letter No. ALT-071 on March 24, 2010 for use at any facility subject to 40 CFR 60 Subpart BB (Kraft pulp mills) or J (petroleum refineries). The Department approved this method for facilities subject to 40 CFR 60, Subpart BB in a letter to the Florida Pulp and Paper Association Environmental Affairs, Inc. dated May 15, 2012.

PROPOSED

Note that this alternative method has not been approved by Department Order pursuant to Rule 62-297.620, F.A.C.

As such, based on the comment, the Condition, renumbered to H.29 is changed as follows.:

H.29. Total Reduced Sulfur (TRS). EPA Method 16, ~~or~~ EPA Method 16A, EPA Method 16B, or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010) shall be used to determine the TRS concentration. The TRS concentration shall be corrected to the appropriate oxygen concentration using the procedure in Condition H.21.(3). The sampling time shall be at least 3 hours, but no longer than 6 hours. A compliance test shall be conducted annually, once each federal fiscal year.

[Construction Permit No. AC45-141877; 40 CFR 60.285(d)(1); 40 CFR 60.285(f)(2); Rule 62-296.404(4)~~(a)~~(b)3., F.A.C. (subsumed); Rule 62-204.800(8)(e)6., F.A.C.; EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010; FDEP Letter dated May 15, 2012]

54. Section III, Emissions Units and Specific Conditions, Subsection H. Emissions Unit 021, Condition H.34. Should Appendix TR be referenced under Test Methods and Procedures?

Response: Based on the comment, a new Condition H.36. has been included in the permit as follows:

H.36. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

[Rule 62-297.310, F.A.C.]

The remaining conditions within the Subsection have been renumbered accordingly.

55. Section III, Emissions Units and Specific Conditions, Subsection H. Emissions Unit 021, Condition H.42. PSD Emissions Tracking – NOx Emissions. Currently states that "…the owner or operator shall estimate the NOx emissions based on the procedures described in Appendix HCE, and report the emissions annually." Condition 4 of Appendix HCE requires that "This information (*NOx emissions*) shall be reported for a 5-year period following the addition of HCE in accordance with the terms of Construction Permit No. 089003-013-AC (i.e. calendar years 2008 to 2012)."

Request that this wording be changed to reflect the 5-year reporting requirement of Appendix HCE. "…the owner or operator shall estimate the NOx emissions based on the procedures described in Appendix HCE, and report the emissions annually, for the period 2008 to 2012."

Response: Please refer to the response to Item 22.

Based on the comment, Condition H.42., now renumbered as H.44., is changed as follows:

H.44. PSD Emissions Tracking – NO_x Emissions: To ensure that the addition of HCE authorized by Permit No. 0890003-013-AC will not constitute a major modification, the owner or operator shall ~~estimate the~~ calculate and maintain a record of NO_x emissions in tons per year, on a calendar year basis, for a period of 5 years following resumption of regular operations after the addition of HCE as authorized by Permit No. 0890003-013-AC. The owner or operator shall follow ~~based on~~ the procedures described in Appendix HCE, and provide a written report to the Department on an annual basis for this same 5-year period. ~~emissions annually~~.

[Permit No.0890003-013-AC, Rule 62-212.400(12)(c), F.A.C.; Rule 62-212.300(3)(e)1.,F.A.C.]

PROPOSED

56. Section III, Emissions Units and Specific Conditions, Subsection H. Emissions Unit 021, Condition H.46. Subsection J is specific for EU 033, and therefore does not represent Subpart S Common Conditions.

    Response: Based on the comment the condition has been deleted from the draft permit.

Subsection I. Emissions Unit 024 – C-Line Brownstock Washer System

57. Section III, Emissions Units and Specific Conditions, Subsection I. Emissions Unit 024, Condition I.9. I.9 Total Reduced Sulfur (TRS). This condition reads "EPA Method 16 shall be used to determine the TRS concentration. The sampling time shall be at least 3 hours, but no longer than 6 hours. Method 16A or 16B may be used in place of Method 16. A compliance test shall be conducted every five years, prior to operation permit renewal."

    We request the following wording instead:

    The test method for TRS shall be EPA Method 16, EPA Method 16A, or EPA Method 16B, incorporated and adopted by reference in Chapter 62-297, F.A.C or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 (March 24, 2010), 40 Fed Reg. at p. 9779 (Feb. 22, 2011)) approved by the Department pursuant to Rule 62-297.620. The sampling time shall be at least 3 hours, but no longer than 6 hours. A compliance test shall be conducted every five years, during the federal fiscal year.

    Response: The language in Condition I.9. is based on the language in 40 CFR 60 Subpart BB (40 CFR 60.285(d)(1); 40 CFR 60.285(f)).

    40 CFR 60.285(d)(1), *" Method 16 shall be used to determine the TRS concentration. The TRS concentration shall be corrected to the appropriate oxygen concentration using the procedure in §60.284(c)(3). The sampling time shall be at least 3 hours, but no longer than 6 hours."*

    40 CFR 60.285(f), *"The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:*

    (2) In place of Method 16, Method 16A or 16B may be used."

    The alternative to Method 16A was approved by EPA in their Alternative Method Decision Letter No. ALT-071 on March 24, 2010 for use at any facility subject to 40 CFR 60 Subpart BB (Kraft pulp mills) or J (petroleum refineries). The Department approved this method for facilities subject to 40 CFR 60, Subpart BB in a letter to the Florida Pulp and Paper Association Environmental Affairs, Inc. dated May 15, 2012.

    Note that this alternative method has not been approved by Department Order pursuant to Rule 62-297.620, F.A.C.

    The requirement to conduct compliance testing on a 5-year basis is based on Rule 62-297.310(7)(a)3., F.A.C., which states, "*the owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision.*"

    40 CFR 60.284(c)(3) was amended on Oct. 17, 2000. The condition language is revised based on this amendment.

PROPOSED

As such, based on the comment, Condition I.9 is changed as follows.:

I.9. Total Reduced Sulfur (TRS) Emissions. EPA Method 16, ~~or~~ EPA Method 16A, EPA Method 16B or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010) shall be used to determine the TRS concentration. The TRS concentration shall not be corrected for oxygen content. The sampling time shall be at least 3 hours, but no longer than 6 hours. A compliance test that demonstrates compliance with the applicable emission limiting standard shall be conducted prior to obtaining a renewed operation permit ~~every 5 years, prior to permit renewal~~. The most recent compliance test shall be submitted, provided such test occurred within the 12 months prior to permit renewal.

[40 CFR 60.285(d)(1); 40 CFR 60.283(c)(3), 40 CFR 60.285(f)(2); Rule 62-297.310(7)(a)3., F.A.C.; Rule 62-204.800(8)(e)6., F.A.C.; EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010; FDEP Letter dated May 15, 2012]

58. Section III, Emissions Units and Specific Conditions, Subsection I. Emissions Unit 024, Condition I.9. Should Appendix TR be referenced under Test Methods and Procedures?

Response: Based on the comment, a new Condition I.10. has been included in the permit as follows:

I.10. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

[Rule 62-297.310, F.A.C.]

The remaining conditions within the Subsection have been renumbered accordingly.

Subsection J. Emissions Unit 033 – Pulping System MACT I

59. Section III, Emissions Units and Specific Conditions, Subsection J. Emissions Unit 033, Condition J.18(3)(iii). The reference to Condition M.30 should instead be to Condition J.29.

Response: The reference to Condition J.29. has been corrected, as requested.

60. Section III, Emissions Units and Specific Conditions, Subsection J. Emissions Unit 033, Condition J.24. Change "SSM Plan as amended 10/05/06" to "SSM Plan", as SSM Plan is updated periodically.

Response: The change to Condition J.24. has been made, as requested.

61. Section III, Emissions Units and Specific Conditions, Subsection J. Emissions Unit 033, Condition J.33(5)(i) UNOX Vents Sampling. This condition currently specifies the following procedure: "NCASI Test Method CI/SG/PULP-94-02 shall be used to determine the acetaldehyde, propionaldehyde, methanol, and methyl ethyl ketone concentration." At the time this procedure was incorporated into the mill's permit, this methodology was recommended and considered appropriate for all target analytes. Since that date, Enthalpy Analytical was contracted to conduct recovery studies on Method 94.02 and determine the suitability of this method for acetaldehyde. For all other target analytes, the method yielded very good results. For acetaldehyde, the results did not yield adequate recoveries or accurate results. This work was conducted several years ago. For this reason, RockTenn wishes to also request the use of the industry recommended NCASI

PROPOSED

Test Method CI/SG/PULP 99-02. This method has been validated by additional Enthalpy Analytical studies and is a self validating methodology. We request this wording be changed to

"Either NCASI Test Method CI/SG/PULP-94-02 or NCASI Test Method CI/SG/PULP-99-02 shall be used to determine the acetaldehyde, propionaldehyde, methanol, and methyl ethyl ketone concentration."

Response: The change to Condition J.33.(5)(i) has been made, as requested. With regards to Method 94-02, the Department asks the following:

Was there still bias after the proper correction factor was applied to the acetaldehyde results? Why does the mill wish to keep a test method if there is bias in the results?

62. Section III, Emissions Units and Specific Conditions, Subsection J. Emissions Unit 033, Condition J.35(1)(i). Insert "and" between (i) and (ii) in "J.33.(5)(i)(ii)".

    Response: The change to Condition J.35.(1)(i) has been made, as requested.

63. Section III, Emissions Units and Specific Conditions, Subsection J. Emissions Unit 033, Condition J.35. Should Appendix TR be referenced under Test Methods and Procedures?

    Response: Based on the comment, a new Condition J.36. has been included in the permit as follows:

    J.36. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

    [Rule 62-297.310, F.A.C.]

    The remaining conditions within the Subsection have been renumbered accordingly.

64. Section III, Emissions Units and Specific Conditions, Subsection J. Emissions Unit 033, Condition J.36. Change "SSM Plan as amended 10/05/06" to "SSM Plan", as SSM Plan is updated periodically.

    Response: The change to Condition J.36. has been made, as requested.

65. Section III, Emissions Units and Specific Conditions, Subsection J. Emissions Unit 033, Condition J.37. The reference to Condition J.15 should instead be to Condition J.16.

    Response: The change to Condition J.37. has been made, as requested.

Subsection L. Emissions Unit 038, 039, 040 – Stationary Diesel Engines

66. Section III, Emissions Units and Specific Conditions, Subsection L. Emissions Units 038, 039, and 040. The John Deere diesel engine (EU 038) is a 6.8 L displacement, not 40.8 L.

    It would be helpful to include the location with the name in the brief description and remove all references to make and model, in the event any need to be replaced to different make or model at a future date., i.e.:

    City Diesel Fire Pump – Gate 1

    Diesel Fire Water Supply Pump – Mill Pond East

    Diesel Fire Water Supply Pump – Mill Pond West.

PROPOSED

Response: The displacement for the John Deere diesel engine is corrected as requested. The location has been added to each pump in the brief description as requested. The make and model information is being retained as the applicability of 40 CFR 60 Subpart IIII, JJJJ and 40 CFR 63 Subpart ZZZZ standards are dependent upon each engine specifications and intended use.

Should the mill need to replace the engines with a different make or model at a future date, an air construction permit would not be required provided the engines meet the exemption criteria of Rule 62-210.300(3)(c)35., F.A.C. Because such engines would likely be subject to either 40 CFR 60 Subpart IIII, JJJJ or 40 CFR 63 Subpart ZZZ, the applicable standards would need to be incorporated into the Title V Permit through a Title V permitting action.

The description is revised as follows:

EU No.	Brief Description
-038	John Deere 210 BHP Diesel Engine, Model JU6H-UF50 (City Diesel Fire Pump located at Gate 1) *The engine is a four-stroke cycle, turbocharged, in-line, 6-cylinder, lean burn, compression ignition, diesel engine with a total displacement of ~~40.8~~ 6.8 liters. It is used for fire suppression. The year of Manufacture is 2004. The engine was placed in service in 2005.* *The engine is subject to 40 CFR 63 40 CFR 63 Subpart ZZZZ National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. In accordance with the definitions of this subpart, the engine is an existing, stationary RICE.*
-039	Caterpillar 292 BHP Diesel Engine, Model 3406c (Diesel Fire Water Supply Pump – Mill Pond East) *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.* *The engine is subject to 40 CFR 63 40 CFR 63 Subpart ZZZZ National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. In accordance with the definitions of this subpart, the engine is an existing, stationary RICE.*
-040	Caterpillar 292 BHP Diesel Engine, Model 3406c (Diesel Fire Water Supply Pump – Mill Pond West) *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.* *The engine is subject to 40 CFR 63 40 CFR 63 Subpart ZZZZ National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. In accordance with the definitions of this subpart, the engine is an existing, stationary RICE.*

67. Section III, Emissions Units and Specific Conditions, Subsection L. Emissions Units 038, 039, and 040, Condition L.6. Change "Each engine shall comply with the following emission standards:" to "Each engine shall comply with the following requirements:" since these conditions are work practice standards and not emission limits.

    Response: The change to Condition L.6. has been made to the word "standards".

PROPOSED

68. Section III, Emissions Units and Specific Conditions, Subsection L. Emissions Units 038, 039, and 040, Condition L.12. Add "The owner or operator must limit…" to the beginning of this condition.

    Response: Based on the comment the condition is revised as follows:

    L.12. Engine Startup. The owner or operator must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine ~~shall be minimized~~, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in 40 CFR 63 Subpart ZZZZ Tables 1a, 2a, 2c, and 2d apply.[1]

    [1] Sources can petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices

    [40 CFR 63.6625(h), Table 2c, Table 2c footnote 3]

69. Section III, Emissions Units and Specific Conditions, Subsection L. Emissions Units 038, 039, and 040, Condition L.13. Delete "emission limitations and" from the first sentence since these are work practice standards.

    Response: Based on the comment, the condition is revised as requested.

70. Section III, Emissions Units and Specific Conditions, Subsection L. Emissions Units 038, 039, and 040, Condition L.20. The reference in this condition should be to Table 6 of Subpart ZZZZ (Continuous Compliance With Emission Limitations, Operating Limitations, Work Practices, and Management Practices). Table 8 of the rule relates to the General Provision of Part 63. Also, 63.6640(e) is not applicable to emergency engines with a site rating of less than 500 brake hp. Emergency engines with a site rating of less than 500 brake hp located at a major source of HAPs must meet 63.6640(f), as reflected in Condition L.5.

    Response: Based on the comment, the condition is deleted.

71. Section III, Emissions Units and Specific Conditions, Subsection L. Emissions Units 038, 039, and 040, Should Appendix TR be referenced under Test Methods and Procedures?

    Response: Based on the comment, a new Condition L.22. has been included in the permit as follows:

    L.22. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

    [Rule 62-297.310, F.A.C.]

Appendix CAM

72. No. 5 Power Boiler and No. 7 Power Boiler- RockTenn had requested in the Title V renewal application that the CAM parameter of total electrostatic precipitator (ESP) secondary power input be specified as a 3-hour block average for both No. 5 Power Boiler and No. 7 Power Boiler. The Department issued a request for additional information (RAI) letter dated July 19, 2011, which stated: "The Department intends to maintain the 1-hour averaging time and shall define the averaging time as a block average as requested." In RockTenn's response to this RAI, dated

PROPOSED

October 14, 2011, RockTenn provided justification for revising the averaging time to a 3-hour block average. This justification was as follows:

There is ample precedent for the 3-hour averaging time for ESP power. In EPA's CAM Technical Guidance Document June 2002), Section A.25 and Table A.25-1, Monitoring Approach, a 3-hour averaging time is shown as an example of a CAM Plan for PM emissions from a coal-fired boiler controlled by an ESP. It is our understanding that the 3-hour averaging time is consistent with the PM test methods (EPA Method 5), for which a compliance test consists of the average of three 1-hour runs. The original Boiler MACT rule, promulgated in 2004 (now vacated), also specified a 3-hour block averaging time for the surrogate parameter of ESP power input. It is interesting to note that the recently promulgated 2011 Boiler MACT rule (now stayed and under reconsideration) specified an even longer averaging time (12-hour block average) for ESP input power. Other examples of boilers with ESP total power input as the CAM parameter include the U.S. Sugar Clewiston Mill (facility ID 0510003) Boiler Nos. 7 and 8. Both of these boilers have 3-hour block averages specified (based on the 2004 Boiler MACT rule).

Since RockTenn submitted its response to the RAI, a revised proposed Boiler MACT rule has been issued by EPA (federal Register, December 23, 2011). This revised proposed rule now contains a 30-day rolling average as an operating limit for ESP power.

In the draft Title V permit, the Department did not present any discussion or rationale for retaining the 1-hour block average. RockTenn requests that the Department reconsider its position on the ESP power CAM parameter. Again, there are a number of examples of boilers that have a 3-hour averaging time for ESP power. The 3-hour block average is consistent with the averaging time for the PM compliance testing.

Response: The excursion average was set at the issuance of Title V Operation Permit No. 0890003-009-AV. The 1-hr duration provides time for the mill to respond to a possible excursion as indicted by the monitoring data, investigation of the excursion cause or causes, and the initiation of potential corrective action before a 3-hour compliance average is possibly exceeded.

Prior to issuance of the draft permit renewal on January 5, 2012, EPA had on May 16, 2011 delayed the effective dates of the March 21, 2011 promulgated 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters until such time as judicial review was no longer pending or until EPA completed its reconsideration of the rules, whichever was earlier.

Since issuance, on January 9, 2012, the United States Court of Appeals for the District of Columbia Circuit issued a decision vacating and remanding the EPA May 18, 2011 delay notice. As such, the March 21, 2011 promulgated 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters is now effective.

The No. 5 Power Boiler and No. 7 Power Boiler are both subject to the provisions of 40 CFR 63 Subpart DDDDD – Industrial, Commercial, and Institutional Boilers and Process Heaters. Pursuant to 40 CFR 63.7490(a)(1), and (d), each boiler appears to be classified as an existing source. As such, pursuant to 40 CFR 63.7495(b), compliance with this subpart must occur no later than March 21, 2014.

The two boilers will continue to be required to conduct monitoring that assures compliance with the CAM requirements as well as comply with the monitoring required by the Boiler MACT no

PROPOSED

later than the compliance date mentioned above. The exemption from the 40 CFR Part 64 requirements stated in section 64.2(b)(i) only applies to NSPS and NESHAP emission limitations or standards proposed by the Administrator after November 15, 1990. This exemption does not extend to monitoring for compliance with other limitations that may also apply to the emissions unit. Since the boilers continue to be subject to emission limits and standards beside those of the Boiler MACT, CAM continues to apply.

Therefore the following changes have been made to the draft permit due to the incorporation of the March 21, 2011 promulgated 40 CFR 63, Subpart DDDDD:

1. Table of Contents. An appendix for 40 CFR 63 Subpart DDDDD has been added to the permit.

2. Section II. Facility-Wide Conditions, Subsection C, Applicable Regulations Table. 40 CFR 63 Subpart DDDDD has been added to the table for EUs 006 and 015.

40 CFR 63, Subpart DDDDD – Industrial, Commercial, and Institutional Boilers and Process Heaters	006, 015

3. Section III. Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Brief Description Permitting Note. 40 CFR 63 Subpart DDDDD has been included in the list of applicable regulations for the No. 5 Power Boiler. It is also stated that the boiler is classified as an existing industrial boiler under the Subpart.

   {Permitting notes: This emissions unit is regulated under: 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; Rule 62-296.340, F.A.C. - Best Available Retrofit Technology (BART) Exemption; Compliance Assurance Monitoring (CAM), adopted and incorporated by reference in Rule 62-204.800, F.A.C.; 40 CFR 63 Subpart S- National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry, adopted and incorporated by reference in Rule 62-204.800, F.A.C., 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. This emissions unit is classified as existing industrial boiler under 40 CFR 63, Subpart DDDDD.}

4. Section III. Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Condition No. A.37. 40 CFR 63 Subpart DDDDD has been included in the list of applicable regulations for the No. 5 Power Boiler.

   A.37. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in:

   40 CFR 61, Subpart A – General Provisions

   40 CFR 61, Subpart E – National Emission Standard for Mercury

   40 CFR 63, Subpart A – General Provisions

   40 CFR 63, Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry

PROPOSED

40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The applicable requirements contained in 40 CFR 63, Subpart A General Provision: Table 10 of 40 CFR 63 Subpart DDDDD, which shows the parts of the General Provisions in §§63.1 through 63.15 are applicable.

[Rule 62-213.440, F.A.C.]

5. Section III. Emissions Units and Specific Conditions, Subsection A. Emissions Unit 006, Condition No. A.38. The following condition has been added to the draft permit.

A.38. Compliance Date: The owner or operator shall comply with the applicable emission limitations
and operating limitations of 40 CFR 63 Subpart DDDDD no later than March 21, 2014.

[40 CFR 40 CFR 63.7495(b)]

6. Section III. Emissions Units and Specific Conditions, Subsection F. Emissions Unit 015, Brief Description Permitting Note. 40 CFR 63 Subpart DDDDD has been included in the list of applicable regulations for the No. 7 Power Boiler. It is also stated that the boiler is classified as an existing industrial boiler under the Subpart.

EU No.	Brief Description
-015	#7 Power Boiler, a coal-fired boiler that is capable of generating 825,000 pounds of steam per hour at 825 °F and 850 psig. Auxiliary equipment includes an economizer, fans and drives, air preheater, instrumentation, breaching and duct work, and related piping. A two-chamber, 6-field each chamber, electrostatic precipitator manufactured by Hamon Research-Cottrell, is used to control particulate emissions. In addition, the Coal Handling System (EP 01) and the Ash Handling System (EP 02) are identified under this emissions unit. PM emissions from the Ash Handling System are controlled by a fabric filter. CAM applies to this emission unit for particulate matter.

{Permitting note(s): The No. 7 Power Boiler is regulated under NSPS - 40 CFR 60, Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971**,** adopted and incorporated by reference in Rule 62-204.800, F.A.C. and Rule 212.400(5), F.A.C., Prevention of Significant Deterioration (PSD): Permit(s) No(s). PSD-FL-062; Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination, dated October 11, 1980 and amended in 1984, Compliance Assurance Monitoring (CAM), adopted and incorporated by reference in Rule 62-204.800, F.A.C.; and 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This emissions unit is classified as existing industrial boiler under40 CFR 63, Subpart DDDDD.}

PROPOSED

The Coal Handling System (EP 01) 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.

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.

7. Section III. Emissions Units and Specific Conditions, Subsection F. Emissions Unit 015, Condition No. F.40. 40 CFR 63 Subpart A, and Subpart DDDDD have been included in the list of applicable regulations for the No. 7 Power Boiler.

   F.40. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in:

   40 CFR Part 60, Subpart A, General Provisions

   40 CFR Part 60, Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971

   40 CFR Part 60, Subpart Y -Standards of Performance for Coal Preparation Plants

   40 CFR 63, Subpart A – General Provisions

   40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The applicable requirements contained in 40 CFR 63, Subpart A General Provision: Table 10 of 40 CFR 63 Subpart DDDDD, which shows the parts of the General Provisions in §§63.1 through 63.15 are applicable.

   [Rule 62-213.440, F.A.C.]

8. Section III. Emissions Units and Specific Conditions, Subsection F. Emissions Unit 015, Condition No. F.41. The following condition has been added to the draft permit.

   F.41. Compliance Date: The owner or operator shall comply with the applicable emission limitations and operating limitations of 40 CFR 63 Subpart DDDDD no later than March 21, 2014.

   [40 CFR 40 CFR 63.7495(b)]

ADDITIONAL CHANGES MADE TO THE DRAFT PERMIT BY DEPARTMENT

1. The State Excess Emissions Rule 62-210.700, F.A.C. has been removed from the draft permit for the Nos. 4 and 5 Smelt Dissolving Tanks, and the Tall Oil Plant. The Smelt Dissolving Tanks are subject to 40 CFR 63 Subpart MM and Rule 62-294.404, F.A.C. The Tall Oil Plant is subject to Rule 62-296.404, F.A.C. The excess emissions are defined by Subpart MM and the General Provisions, specifically 40 CFR 63.6(e)(1), and the State rule.

2. The typo in Condition A.10. Excess Emissions – Alternate Methods 1 or 4 –Startup, Shutdown, Malfunction is corrected. The duration of excess emissions authorized for a warm start-up of the No. 5 power boiler should have stated 3.0 hours in any 24 hour period provided best operational practices to minimize emissions are followed and not 6.0 hours. There is no change being made to the duration for cold start-ups. These time durations are based on the average of the warm startup

PROPOSED

and cold startup periods of excess emissions reported in Table 1 of the additional information response dated October 14, 2011.

A.10. Excess Emissions – Alternate Methods 1 or 4 – Startup, Shutdown, Malfunction. Excess Emissions resulting from startup, shutdown or malfunction shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24 hour period unless authorized by the Department for longer duration. For a cold start-up of this boiler, excess emissions shall not exceed 6.0 hours in any 24 hour period provided best operational practices to minimize emissions are followed. For a warm start-up of this boiler, excess emissions shall not exceed ~~6.0~~ 3.0 hours in any 24 hour period provided best operational practices to minimize emissions are followed. The Department may specifically authorize a longer period on a case by case basis.

A Warm Start-up of this boiler shall mean a startup of the boiler following a shutdown lasting less than 24 hours.

A Cold Start-up of this boiler shall mean a startup of the boiler following a shutdown lasting at least 24 hours.

[Rule 62-210.700(1), F.A.C.; Application No. 0890003-031-AV]

3. The following footnote has been added to Conditions A.5.b.2. and A.8.c.since these conditions are based on Rule 62-210.700(3), F.A.C.

[2] Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

A.5.b.2. Particulate Matter Emissions- Alternate Methods 2 or 3- Soot Blowing & Load Change[1,2]. Particulate Matter emissions shall not exceed an average of 0.3 lb/MMBTU heat input while boiler cleaning (soot blowing) or during a load change. These excess emissions resulting from operation in either of these two modes shall not exceed 3 hours in any 24-hour period. Best operational practices to minimize emissions shall be adhered to and the duration of excess emissions shall be minimized.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[1] Applicable when the boiler is fired with 100% fuel oil during times other than startup, shutdown, or malfunction.

[2] Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

[Rule 62-210.700(3), F.A.C.]

A.8.c. Visible Emissions -Alternate Methods 2 or 3 - Soot Blowing & Load Change[1,2]. Excess emissions resulting from boiler cleaning (soot blowing) and load change shall be permitted provided the duration of such excess emissions shall not exceed 3 hours in any 24-hour period and visible emissions shall not exceed 60% opacity, and provided (1) best operation practices to minimize emissions are adhered to and (2) the duration of excess emissions is minimized.

PROPOSED

Visible emissions above 60% opacity shall be allowed for not more than 4, six (6)-minute periods, during the 3-hour period of excess emissions for boilers that are operating continuous opacity monitors.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[1] Applicable when the boiler is fired with 100% fuel oil during times other than startup, shutdown, or malfunction.

[2] Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

[Rule 62-210.700(3), F.A.C.]

4. The 40 CFR 60.11(d) language in Condition F.3. (No. 7 power boiler), has been revised in order to be consistent with the language in the recently issued Construction Permit No. 0890003-034-AC.

F.3. Methods of Operation - This emissions unit is fired primarily with coal. No. 2 and No. 6 Fuel Oil may be fired during startup, shutdown, and malfunction. ~~but the emissions during these periods must be minimized to the extent practicable pursuant to 40 CFR 60.11(d).~~ At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to 40 CFR 60.11(d). The sulfur content in the fuel oil shall not exceed 2.5% sulfur by weight. The emissions standards of NSPS subpart D do not apply during startup, shutdown, and malfunction.

5. The maximum heat input rate for No. 2 and No. 6 fuel oil for the No. 7 Power Boiler in Condition F.3. has been revised based on information available in the technical evaluation for Construction Permit 0890003-019-AC dated July 17, 2007. The referenced technical evaluation (Page 4), is attached for your review.

F.3. Methods of Operation - …

Alternative Methods of Operation are described below:

Alternative Method	**Fuel Options[1]**	**Maximum Heat Input Rate (MMBtu/hr)**	**Maximum Operating Rate**
1	Coal only (24-hr)	1,021 MMBtu/hr	81,680 lb/hr[2]
2	No. 6 fuel oil only[3] (24-hr)	---[4]	---[4]
3	No. 2 fuel oil only (24-hr)[5]	---[4]	---[4]

PROPOSED

4	Any combination of the alternative methods listed above	1,021 MMBtu/hr	Individual rates listed above
5	Any combination of the alternative methods listed above with No. 5 Power Boiler ash	1,021 MMBtu/hr	Individual rates listed above, 10 tons (bark ash)[6]/hr

[1] Fly ash from the No. 5 Power Boiler may be injected with any alternate method of operation.

[2] Based on coal heating value of 12,500 Btu/lb. Operating rate is not measured; instead, this value is calculated. See Condition F.18. below.

[3] Fuel oil may contain on-spec used oil. Based on No. 6 Fuel Oil heating value of 150mmBtu/1000 gallons.

[4] Technical Evaluation to Permit No. 0890003-019-AC dated July 17, 2007, emissions unit has 4 oil guns installed out of 8 design, which allows boiler to achieve approximately 30 percent of full boiler load. Steady-state operation of No. 6 fuel oil not considered in PSD preconstruction review and is not authorized.

[5] Based on No. 2 Fuel Oil heating value of 140 MMBtu/1000 gallons.

[6] Heating value associated with bark ash is included in 1,021 MMBtu/hr.

[Rule 62-213.410, F.A.C., AO45-169854; EPA Modification to PSD-FL-062 dated 4/13/81; Construction Permit No. AC45-35532; Construction Permit No. 0890003-019-AC; 40 CFR 60.11(d)]

6. The conditions in Subsection F of the permit for the No. 7 power boiler have been revised to reflect the amendments to 40 CFR 60 Subpart D that have occurred since the issuance of the current renewal permit. In addition, the 40 CFR 60 Subpart D language as it pertains to wood residue has been included accordingly.

7. The conditions of Subsections C, E, H, and I of the permit have been revised to reflect the amendments to 40 CFR 60 Subpart BB since the October 17, 2000 amendments:

No. 5 Recovery Boiler – Subsection C:

C.14. Total Reduced Sulfur (TRS). – CEM Data. The permittee shall:

(1) Calculate and record on a daily basis 12-hour average TRS concentrations for the two consecutive periods of each operating day. Each 12-hour average shall be determined as the arithmetic mean of the appropriate 12 contiguous 1-hour average total reduced sulfur concentrations provided by each continuous monitoring system installed pursuant to Condition C.13.

(2) Calculate and record on a daily basis 12-hour average oxygen concentrations for the two consecutive periods of each operating day. These 12-hour averages shall correspond to the 12-hour average TRS concentrations under Condition C.14.(1) and shall be determined as an arithmetic mean of the appropriate 12 contiguous 1-hour average oxygen concentrations provided by each continuous monitoring system installed pursuant to Condition C.13.

(3) Using the following equation, correct all 12-hour average TRS concentrations to 8 volume percent oxygen ~~using the following equation~~:

Ccorr = Cmeas*(21-X/21-Y)

PROPOSED

where:

Ccorr = the concentration corrected for oxygen.

Cmeas = the concentration uncorrected for oxygen.

X = the volumetric oxygen concentration in percentage to be corrected to (8 percent for recovery furnaces).

Y = the measured 12-hour average volumetric oxygen concentration.

[40 CFR 60.284(c)]

C.18. Particulate Matter. For the purposes of determining the concentration of PM emitted from this emissions unit, EPA Method 5 in Appendix A of 40 CFR Part 60 shall be used, except that Method 17 in Appendix A of 40 CFR Part 60 may be used in lieu of Method 5 if a constant value of 0.009 g/dscm (0.004 gr/dscf) is added to the results of Method 17, and the stack temperature is no greater than ~~205~~ 204 °C (400 °F). For Methods 5 and 17, the sampling time and sample volume for each run must be at least 60 minutes and 0.90 dscm (31.8 dscf), and water must be used as the cleanup solvent instead of acetone in the sample recovery procedure. The particulate concentration shall be corrected to the appropriate oxygen concentration according to Condition C.19. A compliance test shall be conducted annually, once each federal fiscal year.

[40 CFR 63.865(b)(1); 40 CFR 60.285(b)(1), 40 CFR 60.285(f)(1); Construction Permit No. 0890003-010-AC]

C.23. Total Reduced Sulfur (TRS). The owner or operator shall determine compliance with the TRS standards in Condition Nos. C.6. and C.7. as follows:

(1) Method 16 shall be used to determine the TRS concentration. As an alternative to Method 16, Method 16A or 16B may be used. The TRS concentration shall be corrected to the appropriate oxygen concentration using the procedure in Condition C.19. The sampling time shall be at least 3 hours, but no longer than 6 hours. A compliance test shall be conducted annually, once each federal fiscal year when the recovery boiler has been operated in Cross Recovery Furnace Operation Mode during the given year. Otherwise, a compliance test shall be conducted prior to obtaining a renewed operation permit. The most recent compliance test shall be submitted, provided such test occurred within the 12 months prior to permit renewal.

(2) The emission rate correction factor, integrated sampling and analysis procedure of Method 3B shall be used to determine the oxygen concentration. The sample shall be taken over the same time period as the TRS samples.

(3) When determining whether a furnace is a straight Kraft recovery furnace or a cross recovery furnace, TAPPI Method T.624 (incorporated by reference-see 40 CFR 60.17) shall be used to determine sodium sulfide, sodium hydroxide, and sodium carbonate. These determinations shall be made 3 times daily from the green liquor, and the daily average values shall be converted to sodium oxide (Na_2O) and substituted into the following equation to determine the green liquor sulfidity:

$$GLS = 100\ C_{Na2S} / (C_{Na2S}\ \cancel{+C_{Na_2H}+C_{Na_2CO3}}\ \underline{C_{NaOH}}\ \underline{C_{Na2CO3}})$$

where:

GLS = green liquor sulfidity, percent.

PROPOSED

CNa_2S = concentration of Na_2S as Na_2O, mg/liter (gr/gal).

CNaOH = concentration of NaOH as Na_2O, mg/liter (gr/gal).

CNa_2CO_3 = concentration of Na_2CO_3 as Na_2O, mg/liter (gr/gal).

Straight Kraft recovery furnace means a furnace used to recover chemicals consisting primarily of sodium and sulfur compounds by burning black liquor which on a quarterly basis contains 7 weight percent or less of the total pulp solids from the neutral sulfite semichemical process or has green liquor sulfidity of 28 percent or less.

Cross recovery furnace means a furnace used to recover chemicals consisting primarily of sodium and sulfur compounds by burning black liquor which on a quarterly basis contains more than 7 weight percent of the total pulp solids from the neutral sulfite semichemical process and has a green liquor sulfidity of more than 28 percent.

[40 CFR 60.281(i) & (j); 40 CFR 60.285(d); 40 CFR 60.285(f)(2); Rule 62-297.310(7)(a)3., F.A.C., Construction Permit No. 0890003-010-AC]

A new Condition C.17. was added to reflect the requirements of 40 CFR 60.284(f):

C.17. Continuous Parameter Monitoring System (CPMS) – TRS, O_2, Opacity. The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring systems required by 40 CFR 60.284 (Condition Nos. C.13. and C.15.). All continuous monitoring systems shall be operated in accordance with the applicable procedures under Performance Specifications 1, 3, and 5 of appendix B of Part 60.

[40 CFR 60.284(f)]

No. 5 Smelt Dissolving Tank – Subsection E:

E.16. Particulate Matter - Concentration. For the purposes of determining the concentration of PM emitted from this emissions unit, EPA Method 5 in Appendix A of 40 CFR Part 60 shall be used, except that Method 17 in Appendix A of 40 CFR Part 60 may be used in lieu of Method 5 if a constant value of 0.009 g/dscm (0.004 gr/dscf) is added to the results of Method 17, and the stack temperature is no greater than ~~205~~ 204 °C (400 °F). For Methods 5 and 17, the sampling time and sample volume for each run must be at least 60 minutes and 0.90 dscm (31.8 dscf), and water must be used as the cleanup solvent instead of acetone in the sample recovery procedure. A compliance test shall be conducted annually, once each federal fiscal year.

[40 CFR 63.865(b)(1); 40 CFR 60.285(c); 40 CFR 60.285(f)(1); Rule 62-296.404(4)(c)1., F.A.C.; Construction Permit No. 0890003-016-AC]

E.17. Particulate Matter – Emission Rate.

(1) The emission rate of particulate matter shall be computed for each run using the following equation:

E = cs Qsd/BLS

where:

PROPOSED

E = emission rate of particulate matter, g/kg (lb/ton) of BLS.

cs = concentration of particulate matter, g/dcsm (lb/dscf).

Qsd = volumetric flow rate of effluent gas, dscm/hr (dscf/hr).

BLS = black liquor solids (dry weight) feed rate, kg/hr (ton/hr).

(2) The particulate matter concentration (cs) shall be determined using the test method in Condition No. E.16.

(3) For purposes of selecting sampling port location and number of traverse points, Method 1 or 1A in Appendix A of 40 CFR Part 60 shall be used;

(4) For purposes of determining stack gas velocity and volumetric flow rate, Method 2, 2A, 2C, 2D, 2F, or 2G in appendix A of 40 CFR Part 60 shall be used;

(5) For purposes of conducting gas analysis, Method 3, 3A, or 3B in Appendix A of 40 CFR Part 60 shall be used. The voluntary consensus standard ANSI/ASME PTC 19.10-1981--Part 10 (incorporated by reference--see 40 CFR 63.14) may be used as an alternative to using Method 3B;

(6) For purposes of determining moisture content of stack gas, Method 4 in Appendix A of 40 CFR Part 60 shall be used; and.

(7) Process data measured during the performance test must be used to determine the black liquor solids firing rate on a dry basis.

[40 CFR 60.285(c); 40 CFR 63.865(b)(5) and (6); Construction Permit No. 0890003-016-AC]

E.18.a. Total Reduced Sulfur (TRS). The owner or operator shall determine compliance with the TRS standards in Condition E.5. as follows. A compliance test shall be conducted prior to obtaining a renewed operation permit. The most recent compliance test shall be submitted, provided such test occurred within the 12 months prior to permit renewal:

(1) The emission rate of TRS shall be computed for each run using the following equation:

E = CTRS F Qsd/P

where:

E = emission rate of TRS, g/kg (lb/ton) of BLS or ADP.

CTRS = average combined concentration of TRS, ppm.

F = conversion factor, 0.001417 g H_2S/m^3-ppm (~~0.08844*10^{-6}~~ 8.846x10^{-8} lb H_2S/ft^3-ppm).

Qsd = volumetric flow rate of stack gas, dscm/hr (dscf/hr).

P = black liquor solids feed or pulp production rate, kg/hr (ton/hr).

(2) Method 16 shall be used to determine the TRS concentration (CTRS).

(3) Method 2 shall be used to determine the volumetric flow rate (Qsd) of the effluent gas.

(4) Process data shall be used to determine the black liquor feed rate or the pulp production rate (P).

PROPOSED

[40 CFR 60.285(e); Rules 62-296.404(4)(c)3., 62-297.310(7)(a)3., 62-297.310(7)(a)4.b. F.A.C., Rules 62-297.401(16) and (16)(a), F.A.C.; Construction Permit No. 0890003-010-AC; Construction Permit No. 0890003-016-AC]

A new Condition E.15. was added to reflect the requirements of 40 CFR 60.284(f):

E.15. Continuous Parameter Monitoring System (CPMS) – PM. The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring systems required by 40 CFR 60.284 (PM- Condition E.13.b.). All continuous monitoring systems shall be operated in accordance with the applicable procedures under Performance Specifications 1, 3, and 5 of appendix B of Part 60.
[40 CFR 60.284(f)]

No. 4 Lime Kiln– Subsection H:

H.21. Total Reduced Sulfur (TRS). – CEM Data. The permittee shall:

(1) Calculate and record on a daily basis 12-hour average TRS concentrations for the two consecutive periods of each operating day. Each 12-hour average shall be determined as the arithmetic mean of the appropriate 12 contiguous 1-hour average total reduced sulfur concentrations provided by each continuous monitoring system installed pursuant to Condition H.20.

(2) Calculate and record on a daily basis 12-hour average oxygen concentrations for the two consecutive periods of each operating day. These 12-hour averages shall correspond to the 12-hour average TRS concentrations under Condition H.21.(1) and shall be determined as an arithmetic mean of the appropriate 12 contiguous 1-hour average oxygen concentrations provided by each continuous monitoring system installed pursuant to Condition H.20.

(3) Using the following equation, correct all 12-hour average TRS concentrations to 10 volume percent oxygen ~~using the following equation~~:

Ccorr = Cmeas*(21-X/21-Y)

where:

Ccorr = the concentration corrected for oxygen.

Cmeas = the concentration uncorrected for oxygen.

X = the volumetric oxygen concentration in percentage to be corrected to (10 percent for lime kilns).

Y = the measured 12-hour average volumetric oxygen concentration.

[40 CFR 60.284(c)(1),(2), and (3); Rule 62-296.404(5)(b), F.A.C.]

PROPOSED

A new Condition H.22. was added to reflect the requirements of 40 CFR 60.284(f):

H.22. Total Reduced Sulfur (TRS) and O_2. The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring systems required by 40 CFR 60.284 (TRS and O_2). All continuous monitoring systems shall be operated in accordance with the applicable procedures under Performance Specifications 1, 3, and 5 of appendix B of Part 60.

[40 CFR 60.284(f)]

C-Line Brownstock Washer System – Subsection I:

I.4. Total Reduced Sulfur (TRS) Emissions. Total Reduced Sulfur (TRS) Emissions shall not exceed 5 ppm by volume on a dry basis, ~~corrected to the actual oxygen content of the untreated gas stream~~ uncorrected for oxygen content, 0.16 lbs/hr and 0.7 TPY.

[Rule 62-204.800(8)(b)35., F.A.C.; 40 CFR60.283(a)(1)(v); Construction Permit No. AC45-190383/PSD-FL-165]

I.7. Excess Emissions – TRS. Periods of excess emissions reported under Condition No. ~~I.6.~~ I.11. shall not be considered to be indicative of a violation of 40 CFR 60.11(d) provided that the Administrator determines that the affected facility, including air pollution control equipment, is maintained and operated in a manner, which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions.

[40 CFR 60.284(e)(2)]

I.11. Excess Emissions – TRS. For the purpose of reports required under 40 CFR 60.7(c), the owner or operator shall report semiannually periods of excess emissions.

[40 CFR 60.284(d)~~(3)(i)~~]

8. Greenhouse gases are addressed in the Statement of Basis as follows:

   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.

9. The mill did not request the alternate to EPA Method 16A for the No. 5 Recovery Boiler in Condition C.24.(1) be added. Based on Comments 18, 19, 34, 40, 47, 53, and 57 by the mill, the Department proposes to change Condition C.24. as follows:

   C.24. Total Reduced Sulfur (TRS). The owner or operator shall determine compliance with the TRS standards in Condition Nos. C.6. and C.7. as follows:

   (1) EPA Method 16, EPA Method 16A, EPA Method 16B, or the alternative to Method 16A (EPA Alternative Method Decision Letter No. ALT-071 dated March 24, 2010) shall be used to determine the TRS concentration. ~~As an alternative to Method 16, Method 16A or 16B, may be used.~~ The TRS concentration shall be corrected to the appropriate oxygen concentration using the procedure in Condition C.19. The sampling time shall be at least 3 hours, but no longer than 6 hours. A compliance test shall be conducted annually, once each federal fiscal year when the recovery boiler has been operated in Cross Recovery

PROPOSED

Furnace Operation Mode during the given year. Otherwise, a compliance test shall be conducted prior to obtaining a renewed operation permit. The most recent compliance test shall be submitted, provided such test occurred within the 12 months prior to permit renewal.

10. The mill did not request the changes to the condition language in Condition E.29. for the NOx emissions annual reports due to the HCE project for the No. 5 Power Boiler. Based on Comment 22, Comment 31, and Comment 55, the Department proposes to change Condition E.29. as follows:

E.29. PSD Emissions Tracking – NO_x Emissions: To ensure that the addition of HCE authorized by Permit No. 0890003-013-AC will not constitute a major modification, the owner or operator shall ~~estimate the~~ calculate and maintain a record of NO_x emissions in tons per year, on a calendar year basis, for a period of 5 years following resumption of regular operations after the addition of HCE as authorized by Permit No. 0890003-013-AC. The owner or operator shall follow ~~based on~~ the procedures described in Appendix HCE, and provide a written report to the Department on an annual basis for this same 5-year period. ~~emissions annually~~.

[Permit No.0890003-013-AC, Rule 62-212.400(12)(c), F.A.C.; Rule 62-212.300(3)(e)1.,F.A.C.]

On June 18, 2012, the Department received comments on the 2nd Draft permit (issued June 8, 2012), from the consultant on behalf of the applicant. Based on these comments, the following changes were made to the draft Title V Permit Renewal:

1. Subsection A. Emissions Unit 006 – No. 5 Power Boiler

p. 8 Permitting notes under Brief Description – The permitting notes continue to refer to Rule 296.405 for Fossil Fuel Steam Generators. As commented on previously, the No. 5 Power Boiler is a carbonaceous fuel burning boiler and is therefore subject to 62-296.410, and not to 62-296.405. The burning of fuel oil is specifically recognized for carbonaceous fuel-fired boilers under Rule 62-296.410. RockTenn has researched similarly operated combination boilers and carbonaceous fuel fired boilers in the state, and found that they are not subject to 62-296.405.

In the Statement of Basis for this 2nd working draft, the Department refers to correspondence from the Department to the facility in 2005:

Department Response dated May 15, 2012 & June 8, 2012: On February 27, 2006, the Department addressed a similar comment received from Mr. Warren S. Flenniken in a December 1, 2005 letter regarding the Draft Title V Operation Permit Renewal No. 0890003-009-AV. The submitted comment and Department response are repeated below in their entirety:

"Comment #16:

A.4, A.5, A.7, A.8, A.9, A.13, A.24 Please delete all references to Rule 62-296.405.

This rule applies to fossil fuel steam generators. The No. 5 Power Boiler is primarily a carbonaceous fuel-fired boiler, and is not a fossil fuel steam generator. See the definitions at Rule 62-210.200(56) and (120). The definition of carbonaceous fuel burning equipment explicitly recognizes that fossil fuels can be burned in addition to carbonaceous fuels. The previous construction permits for this

PROPOSED

boiler do not reference Rule 296.405. In addition, there are numerous carbonaceous/oil-fired boilers permitted around the state which are not regulated under 296.405.

As a result, soot blowing and load change provisions referenced in A.4.b.2., A.7.c., A.8.b.2., and A.13.c. are not applicable and should be deleted. The quarterly reporting requirements in A.24 should also be deleted since these requirements are based on 296.405.

As a related issue, there is no reason to have separate emission standards for alternative methods of operations 1 through 4. PM emissions are adequately covered in Condition A.4.a.- please delete A.4.b.1 and A.4.b.2. Also, please delete A.8.b.1. and A.13.b.

Department Response dated February 27, 2006. In the Rule Applicability, Section II, of the Technical Evaluation and Preliminary Determination dated May 6, 1991, that was issued with the draft construction permit for the No. 5 Power Boiler, it is stated that the No. 5 PB is subject to the applicable provisions of …17-2.620(5)(a): Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input-Existing Sources; 17-2.600(10): Carbonaceous Fuel Burning Equipment… It was stated in the cover letter, that this version was a revised version to address the firing of No. 6 fuel oil at 100% in the boiler, the applicable emissions standards, and any monitoring and recording requirements. Furthermore, in a letter dated May 14, 1991, from Mr. Roger P. Hagan, Technical Department, to Mr. Clair Fancy, P.E., concerning Construction Permit No. AC45-194149, the following is stated in reference to Specific Condition No. 17 of the permit, "The purpose of this requirement, as we understand it, is to provide for the possibility that the boiler may be operated on fuel oil alone for reasons other than start-up, shutdown or malfunction, during which time it would be subject to the appropriate provisions of FAC and CFR relating to fossil fuel burning boilers."

If this boiler is being operated on fuel oil during times other than startup, shutdown, or malfunction, it appears that the requirements of Rule 62-296.405, F.A.C. are applicable. If this boiler is not being operated in this manner, then permit condition language should be added to clarify its operation."

Department Response dated May 15, 2012 & June 8, 2012: A copy of the May 6, 1991 Technical Evaluation and May 14, 1991 letter is also attached. It is noted that for each specific condition for power boiler No. 5 which references Rule 62-296.405, F.A.C. the Rule is specifically stated such as Rule 62-296.405(1)(a), F.A.C. or Rule 62-296.405(1)(b), F.A.C. to provide specificity for the portion of the rule which supports that specific condition.

<u>June 18, 2012 comment on behalf of the applicant:</u>

However, it is noted that nowhere in permit no. AC45-194149 is Rule 62-296.405 referred to. RockTenn acknowledges that the conditions contained in AC45-194149 reflect rule 296.405, and RockTenn is not requesting that these conditions be removed or changed, but only that the references to this rule be removed. As stated previously, permits for other similar carbonaceous fuel burners in the state do not reflect these conditions or rule applicability. Therefore, RockTenn requests that the references to Rule 62-296.405 be removed throughout Subsection III.A.

Response: In accordance with Rule 62-213.440, F.A.C., each permit issued under Chapter 62-213 is required to include all emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements, with

PROPOSED

citation to the Department's rule authority for each term or condition, and identification of any difference in form from the applicable requirement upon which the term or condition is based.

Please also note that the rule requirements of Rule 62-296.405, F.A.C. were added to the No. 5 Power Boiler through a separate construction permitting process, Construction Permit No. 0890003-010-AC issued November 7, 2006.

Accordingly, Rule 62-296.405, F.A.C. has been cited in Subsection A of the Title V permit for the No. 5 Power Boiler.

2.

p. 9 State Excess Emissions- There does not appear to be any excess emissions allowance for the SO_2 limit in Condition A.6. Since this limit is imposed under a state rule (62-296.340), the state excess emissions rule (62-210.700) should be applicable.

Response: Condition A.6. states the 550.0 pound per hour SO_2 limit, based on a 24-hour rolling average as determined by SO_2 CEMS. This limit allows the mill to be exempt from the requirements of Best Available Retrofit Technology (BART) pursuant to Rule 62-296.340, F.A.C. The condition states that failure to comply with the SO_2 standard may subject the facility to BART review.

Specific Condition No. 6 of the underlying Construction permit, No. 0890003-018-Ac, states that the permittee shall follow the procedures in Appendix D of the permit for calculating annual emissions. Condition No. 15 of the Appendix D states that all valid data, shall be used when calculating annual emissions and that annual emissions shall include data collected during startup, shutdown, and malfunction periods.

In order to address excess emissions which occur and are subject to the excess emissions rule located in Rule 62-210.700, F.A.C. Appendix EX Excess Emissions has been established. Appendix EX is referenced by FW condition No. 1. It is noted that Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

3. <u>Subsection B. Emissions Unit 007 – No. 4 Recovery Boiler</u>

p. 20. The permit does not appear to provide for any excess emissions for several state emission limits. Conditions B.5.b, B.6, and B.7.a are all emission limits based on state rules. It therefore appears that the state excess emissions rule (62-210.700) should apply to these limits. This would be irrespective of any NSPS or NEHAPS limits, which are governed by those rules.

In RockTenn's permit renewal application, we had originally asked for 4 hours of allowable excess emissions during SSM events for No. 4 Recovery Boiler. DEP's comments indicate we did not provide more information as requested in DEP's RAI. But it is further stated that "The State Excess Emissions Rule 62-210.700, F.A.C. has been removed from the draft permit for this emissions unit." 62-210.700(1) states "Excess emissions resulting from SSM of any emission unit shall be permitted providing (1) best operational practices to minimize emission are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour permit sunless specifically authorized by the Department for longer duration."

PROPOSED

Response: Condition B.5.b. states the applicable particulate matter emissions limit based on State Rule 62-296.404(2)(a), F.A.C. The No. 4 Recovery Boiler is also subject to the 40 CFR 63 Subpart MM particulate matter standard in 63.862(a)(1)(i)(A), which is stated in Condition B.5.a. of the draft permit. As such, the federal operational and maintenance standards of 40 CFR 63.6(e)(1) stated in Condition B.10. have been included in the draft permit as well as any excess emission allowances defined by Subpart MM.

Condition B.6. states the applicable TRS emissions limit based on State Rule 62-296.404(3)(c)1.b., F.A.C. Rule 62-296.404(6), F.A.C. defines excess emissions for this pollutant which is incorporated into the Title V permit in Condition B.21.

Condition B.7.a. states the applicable visible emissions limits based on State Rule 62-296.404(1)(a)1., F.A.C. The No. 4 Recovery Boiler is also subject to 40 CFR 63 Subpart MM which establishes monitoring exceedances for opacity.

In order to address excess emissions which occur and are subject to the excess emissions rule located in Rule 62-210.700, F.A.C. Appendix EX Excess Emissions has been established. Appendix EX is referenced by FW condition No. 1. It is noted that Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision

4.

p. 23 B.13. The reference to Condition B.4.a should instead be to Condition B.5.a.

Response: The reference to Condition B.4.a. has been corrected to Condition B.5.a.

5. <u>Subsection C. Emissions Unit 011 – No. 5 Recovery Boiler</u>

p. 33 C.12. The reference to Condition C.32 should instead be to Condition C.36.

Response: The reference to Condition C.32. has been corrected to Condition C.36.

6. <u>Subsection D. Emissions Unit 013 – No. 4 Smelt Dissolving Tank</u>

p. 43. The permit does not appear to provide for any excess emissions for the state opacity limit. Condition D.6 is an opacity limit based on state rules. It therefore appears that the state excess emissions rule (62-210.700) should apply to this limit. This would be irrespective of any NSPS or NEHAPS limits, which are governed by those rules.

In RockTenn's permit renewal application, we had originally asked for 4 hours of allowable excess emissions during SSM events for No. 4 Smelt Dissolving Tank. DEP's comments indicate we did not provide more information as requested in DEP's RAI. But then it is further stated that "The State Excess Emissions Rule 62-210.700, F.A.C. has been removed from the draft permit for this emissions unit." 62-210.700(1) states "Excess emissions resulting from SSM of any emission unit shall be permitted providing (1) best operational practices to minimize emission are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour permit sunless specifically authorized by the Department for longer duration."

PROPOSED

Response: In order to address excess emissions which occur and are subject to the excess emissions rule located in Rule 62-210.700, F.A.C. Appendix EX Excess Emissions has been established. Appendix EX is referenced by FW condition No. 1. It is noted that Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

7. Subsection E. Emissions Unit 014 – No. 5 Smelt Dissolving Tank

p. 52. The permit does not appear to provide for any excess emissions for the state opacity limit. Condition E.6 is an opacity limit based on state rules. It therefore appears that the state excess emissions rule (62-210.700) should apply to this limit. This would be irrespective of any NSPS or NEHAPS limits, which are governed by those rules.

In RockTenn's permit renewal application, we had originally asked for 4 hours of allowable excess emissions during SSM events for No. 5 Smelt Dissolving Tank. DEP's comments indicate we did not provide more information as requested in DEP's RAI. But then it is further stated that "The State Excess Emissions Rule 62-210.700, F.A.C. has been removed from the draft permit for this emissions unit." 62-210.700(1) states "Excess emissions resulting from SSM of any emission unit shall be permitted providing (1) best operational practices to minimize emission are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour permit sunless specifically authorized by the Department for longer duration."

Response: In order to address excess emissions which occur and are subject to the excess emissions rule located in Rule 62-210.700, F.A.C. Appendix EX Excess Emissions has been established. Appendix EX is referenced by FW condition No. 1. It is noted that Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

8. Subsection F. Emissions Unit 015 – No. 7 Power Boiler

p. 66. The permit does not appear to provide for any excess emissions for several state limits. Conditions F.8, F.10, F.11, and F.12 contain limits based on state rules. It therefore appears that the state excess emissions rule (62-210.700) should apply to these limits. This would be irrespective of any NSPS or NEHAPS limits, which are governed by those rules.

In RockTenn's permit renewal application, we had originally asked for 4.5 hours of allowable excess emissions during SSM events for No. 7 Power Boiler. DEP's comments indicate we did not provide more information as requested in DEP's RAI. But then it is further stated that "The State Excess Emissions Rule 62-210.700, F.A.C. has been removed from the draft permit for this emissions unit." 62-210.700(1) states "Excess emissions resulting from SSM of any emission unit shall be permitted providing (1) best operational practices to minimize emission are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour permit sunless specifically authorized by the Department for longer duration."

PROPOSED

Response: Condition F.8. states the applicable carbon monoxide emissions limit for the No. 7 Power Boiler based on EPA/DEP agreement and 40 CFR 52.21(j). Conditions F.11. and F.12. state the opacity and particulate matter emission limits for the fly ash handling system based on 40 CFR 52.21(j) and the PSD permit.

Any authorized excess emissions would have been established by the federal regulations and the terms of the PSD permit, which have been incorporated into the Title V permit.

Condition F.10. states the applicable opacity standard for the coal preparation and handling system based on 40 CFR Subpart Y and the PSD permit. As such, the federal Good Air Pollution Control Practices of 40 CFR 60.11(d) have been included in the draft permit in Condition F.13.

In order to address excess emissions which occur and are subject to the excess emissions rule located in Rule 62-210.700, F.A.C. Appendix EX Excess Emissions has been established. Appendix EX is referenced by FW condition No. 1. It is noted that Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

9. <u>Subsection G. Emissions Unit 021 – No. 4 Lime Kiln</u>

p. 83. The permit does not appear to provide for any excess emissions for the state opacity limit. Condition H.7 is an opacity limit based on state rules. It therefore appears that the state excess emissions rule (62-210.700) should apply to this limit. This would be irrespective of any NSPS or NEHAPS limits, which are governed by those rules.

In RockTenn's permit renewal application, we had originally asked for 12 hours of allowable excess emissions during SSM events for No. 4 Lime Kiln. DEP's comments indicate we did not provide more information as requested in DEP's RAI. But then it is further stated that "The State Excess Emissions Rule 62-210.700, F.A.C. has been removed from the draft permit for this emissions unit." 62-210.700(1) states "Excess emissions resulting from SSM of any emission unit shall be permitted providing (1) best operational practices to minimize emission are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour permit sunless specifically authorized by the Department for longer duration."

Response: Condition H.7.a. states the applicable visible emissions limits based on State Rule 62-296.404(1)(a)1., F.A.C. The No. 4 Lime Kiln is also subject to 40 CFR 63 Subpart MM which establishes monitoring exceedances for opacity.

In order to address excess emissions which occur and are subject to the excess emissions rule located in Rule 62-210.700, F.A.C. Appendix EX Excess Emissions has been established. Appendix EX is referenced by FW condition No. 1. It is noted that Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

PROPOSED

10. Subsection J. Emissions Unit 033 – Pulping System MACT I

p. 107. Also see Statement of Basis, Comment #61. This comment is in reference to RockTenn's request to utilize either NCASI Test Method CI/SG/PULP-94-02 or NCASI Test Method CI/SG/PULP-99-02 to determine UNOX vent stream concentrations. DEP asks "Was there still bias after the proper correction factor was applied to the acetaldehyde results? Why does the mill wish to keep a test method if there is bias in the results?"

RockTenn has discussed this issue with NCASI. RockTenn has used NCASI Test Method 94-02 for many years with no issues encountered. As published, NCASI Test Method 94-02 shows different correction factors for different sources and there is no correction factor for wastewater treatment system emissions. So, the only drawback to this method is that it has not been validated for wastewater system vent gas streams.

NCASI Test Method 99-02 is strongly discouraged by NCASI. It is an expensive and difficult method to implement and NCASI no longer uses it. Instead, they recommend the use of Method ISS-FP-A105.01. This is the Impinger Source Sampling Method for Selected Aldehydes, Ketones, and Polar Compounds. It is a self validating method and is much easier to implement. A number of outfits have experience with using it on a variety of sources.

In conclusion, we request that both methods 94-02 and ISS-FP-A105.01 be incorporated into the TV permit, and that method 99-02 be removed.

Response: The change to Condition J.33.(5)(i) has been made, as requested.

J.33. UNOX Vents Sampling. For purposes of determining vent gas stream properties at the North, Center, and South UNOX Vents, the following procedures shall be used:

(1) Method 1 or 1A of Part 60, Appendix A, as appropriate, shall be used for selection of the sampling site as follows:

(i) To sample for vent gas concentrations and volumetric flow rates, the sampling site shall be located prior to dilution of the vent gas stream and prior to release to the atmosphere;

(2) No traverse site selection method is needed for vents smaller than 0.10 meter (4.0 inches) in diameter.

(3) The vent gas volumetric flow rate shall be determined using Method 2, 2A, 2C, or 2D of part 60, appendix A, as appropriate.

(4) The moisture content of the vent gas shall be measured using Method 4 of part 60, appendix A.

(5) To determine vent gas concentrations, the owner or operator shall collect a minimum of three test runs that are representative of normal conditions and average the resulting pollutant concentrations using the following procedures.

PROPOSED

(i) Either NCASI Test Method CI/SG/PULP-94-02 or ~~NCASI Test Method CI/SG/PULP-99-02~~ NCASI Method ISS-FP-A105.01 shall be used to determine the acetaldehyde, propionaldehyde, methanol, and methyl ethyl ketone concentration.

(ii) Total HAPs, V_{HAP}, shall be the summation of methanol, acetaldehyde, propionaldehyde, and methyl ethyl ketone determined from (5)(i) and (5)(ii).

(iii) Provided the Total HAPs mass is less than 0.05 lb/ODTP during the annual testing, V_{HAP} shall be assumed to be equal to the test results measured during the vent gas testing, as well as, for subsequent annual performance test and for compliance with daily monitoring requirements for the next 12 months.

(iv) If the Total HAPs mass equals or exceeds 0.05 lb/ODTP during the annual testing, V_{HAP} shall be determined by direct measurement on a quarterly basis.

(6) The minimum sampling time for each of the three runs per method shall be 1 hour in which either an integrated sample or four grab samples shall be taken. If grab sampling is used, then the samples shall be taken at approximately equal intervals in time, such as 15-minute intervals during the run.

[40 CFR 63.457(b); Condensate Compliance Plan as amended 3/5/01]

ADDITIONAL CHANGES MADE TO THE DRAFT PERMIT BY DEPARTMENT

1. The Rule citation in Condition F.10. is corrected to 62-204.800(8)(b)32., F.A.C.

F.10. Visible Emissions. Visible Emissions shall be less than 20% opacity.

[Rule 62-204.800(8)(b)~~31~~32., F.A.C.; 40 CFR 60.252(c); EPA Modification, PSD-FL-062 dated April 13, 1981]

2. 40 CFR 60 Subpart Y was amended on October 8, 2009. The rule citations have been updated and the amendments have been incorporated into the draft permit.

F.10. Visible Emissions. Visible Emissions shall be less than 20% opacity.

[Rule 62-204.800(8)(b)~~31~~32., F.A.C.; 40 CFR 60.~~252(c)~~ 254(a); EPA Modification, PSD-FL-062 dated April 13, 1981]

F.31. Visible Emissions. Opacity shall be determined ~~by using EPA Method 9 in 40 CFR 60 Appendix A and the procedures in 40 CFR 60.11~~ as specified in paragraphs (1) through (3) below. A compliance test shall be conducted annually, once each federal fiscal year.

(1) Method 9 of appendix A–4 of this part and the procedures in §60.11 must be used to determine opacity, with the exceptions specified in paragraphs (1)(i) and (ii).

PROPOSED

(i) The duration of the Method 9 of appendix A–4 of this part performance test shall be 1 hour (ten 6-minute averages).

(ii) If, during the initial 30 minutes of the observation of a Method 9 of appendix A–4 of this part performance test, all of the 6-minute average opacity readings are less than or equal to half the applicable opacity limit, then the observation period may be reduced from 1 hour to 30 minutes.

(2) To determine opacity for fugitive coal dust emissions sources, the additional requirements specified in paragraphs (2)(i) through (iii) must be used.

(i) The minimum distance between the observer and the emission source shall be 5.0 meters (16 feet), and the sun shall be oriented in the 140-degree sector of the back.

(ii) The observer shall select a position that minimizes interference from other fugitive coal dust emissions sources and make observations such that the line of vision is approximately perpendicular to the plume and wind direction.

(iii) The observer shall make opacity observations at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. Water vapor is not considered a visible emission.

(3) A visible emissions observer may conduct visible emission observations for up to three fugitive, stack, or vent emission points within a 15-second interval if the following conditions specified in paragraphs (3)(i) through (iii) of this condition are met.

(i) No more than three emissions points may be read concurrently.

(ii) All three emissions points must be within a 70 degree viewing sector or angle in front of the observer such that the proper sun position can be maintained for all three points.

(iii) If an opacity reading for any one of the three emissions points is within 5 percent opacity from the applicable standard (excluding readings of zero opacity), then the observer must stop taking readings for the other two points and continue reading just that single point.

[40 CFR 60.254~~5~~(a), ~~(b)(2)~~ 40 CFR 60.257(a)]

CONCLUSION

This project renews Title V air operation permit No. 0890003-028-AV, which was issued on May 26, 2010. This 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.

PROPOSED