Florida Department of Environmental Protection

Northwest District Office
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Pensacola, Florida 32502 - 5740

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Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

December 4, 2017

By Electronic Mail – Received Receipt Requested
tommy.martin@westrock.com

PERMITTEE

WestRock CP, LLC
One Everitt Avenue
Panama City, Florida 32402

Authorized Representative:
Mr. Tommy Martin, General Manager

Air Permit No. 0050009-044-AC
Permit Expires: December 4, 2022
Title V Air Construction Permit

Panama City Mill
WestRock Brown Stock Washer Up-Grade

PROJECT

This is the final air construction permit, which authorizes the facility to replace four existing Brownstock Washer Systems (Nos. 1, 2, 4, and 8) with one new No. 1 Brownstock Washer System. The high volume low concentration (HVLC) gases from the new No. 1 Brownstock Washer System will be collected and destroyed in either the Nos. 1 or 2 Recovery Furnaces. In addition, a change in the method of operation is being requested for the 6A/6B deckers to allow the Deckers to use stripped condensate as shower water. Also, the filtrate from the Decker System will now be used as shower water on the Nos. 3 and 5 Brownstock Washer systems.

The proposed work will be conducted at the existing Panama City Mill, which is a Pulp and Paper Manufacturing Facility categorized under Standard Industrial Classification Nos. 2611 (Pulp Mills) and 2621 (Paper Mills). The existing facility is located in Bay County at One Everitt Avenue in Panama City, Florida. The UTM coordinates are Zone 16, 632.8 km East and 3335.1 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Pensacola, Florida.

Elizabeth Mullins Orr

_____ 12/4/17

Elizabeth Orr Date
Assistant Director

EO/to/c

CERTIFICATE OF SERVICE

The undersigned duly designated agency clerk hereby certifies that this Air Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Tommy Martin, General Manager, WestRock CP, LLC tommy.martin@westrock.com
Mr. Tom Clements, Environmental Superintendent, WestRock CP, LLC, tom.clements@westrock.com
Ms. Sheryl Watkins, P.E., AECOM, Sheryl.watkins@aecom.com
Mr. Mark Sumner, DEP NWD Panama City, mark.c.sumner@dep.state.fl.us
Mr. Tracy White, DEP NWD Panama City, tracy.a.white@dep.state.fl.us

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Mary H. Cole

December 4, 2017

_____ _____

Clerk Date

FACILITY DESCRIPTION

The facility is a Kraft Pulp and Paper Mill that consists of several major activities areas including: wood handling, pulping, bleaching, chemical recovery, the mill power house, paper machines, and associated processes and equipment. Initially wood is ground into chips, then 'digested' in a caustic solution to break down the lignin binding the cellulosic wood fibers. The wood fiber is then washed, bleached, and formed into paper or linerboard. A summary of the facility emissions units is as follows:

(Emission Unit {EU} 001 and 019) No.1 and No.2 Recovery Furnaces. Each has a maximum heat input of 721 million British Thermal Unit per hour (MMBtu/hr). Natural gas, No. 2 diesel fuel, or No.6 fuel oil having a maximum of 2.4 percent (%) sulfur by weight, may be burned in the furnaces. Electrostatic precipitators control particulate matter (PM) emissions. Total reduced sulfur (TRS) emissions are monitored with a continuous emissions monitor (CEM). The recovery furnaces are regulated by Rule 62-296.404, F.A.C., Kraft Pulp Mills; and 40 CFR 63, Subpart MM – NESHAP for Chemical Recovery Combustion Sources at Kraft Pulp Mills.

(EU 015) No.3 Combination Boiler. Boiler No. 3 burns wood, bark, primary clarified wood fibers, secondary solids (residuals) from the aerated stabilization basin, natural gas and/or No. 2 diesel fuel or No. 6 fuel oil. The No. 3 Combination Boiler serves as a control device for the condensate stripper off-gases (SOG) and as a backup control device for the Lime Kiln for non-condensable gases (NCG) from the Multiple Effect Evaporator (MEE) System and from the batch digester system (BDS). Particulate matter (PM) emissions are controlled by a fly-ash arrestor, followed by a variable throat venturi wet scrubber. Sulfur dioxide (SO_2) emissions are controlled by limiting the sulfur content of the fuel oil used to a maximum of 2.4% by weight and are monitored by an SO_2 CEMS. TRS and Hazardous Air Pollutant (HAP) emissions are controlled by injecting the gases into the boiler in the flame zone with the primary fuel or with the combustion air. The boiler is subject to Rule 62-296.410, F.A.C. – Carbonaceous Fuel Burning Equipment; Rule 62-296.404, F.A.C. – Kraft Pulp Mills; 40 CFR 60, Subpart BB – NSPS for Kraft Pulp Mills; and by 40 CFR 63, Subpart S – NESHAP for the Pulp and Paper Industry. The boiler is also subject to 40 CFR 63, Subpart DDDDD (Boiler Maximum Achievable Control Technology (MACT) as of January 31, 2016.

(EU 016) No. 4 Combination Boiler. Boiler No. 4 burns wood, bark, primary clarified wood fibers, secondary solids (residuals) from the aerated stabilization basin, coal, natural gas, and/or No. 2 diesel fuel or No. 6 fuel oil. The No. 4 Combination Boiler serves as a control device for the SOG and as a backup control device for the Lime Kiln for the NCG from the MEE System and from the BDS. PM emissions are controlled by a fly-ash arrestor followed by a wet scrubber. HAP and TRS emissions are controlled by injecting the gases into the boiler in the flame zone with the primary fuel or with the combustion air. The boiler is subject to Rule 62-296.410, F.A.C., Carbonaceous Fuel Burning Equipment; Rule 62-296.404, F.A.C., Kraft Pulp Mills; 40 CFR 60, Subpart BB – NSPS for Kraft Pulp Mills; and 40 CFR 63, Subpart S – NESHAP for the Pulp and Paper Industry. The boiler is also subject to 40 CFR 63, Subpart DDDDD (Boiler MACT).

(EU 020 and 021) No. 1 and No. 2 Smelt Dissolving Tanks. These tanks dissolve smelt in weak wash to yield green liquor. Operating rates are limited by the operating rate of the Recovery Boiler. PM emissions are controlled by venturi scrubbers. TRS emissions are controlled using weak wash as the scrubber media. The weak wash scrubber flow is monitored as a surrogate compliance parameter. The smelt dissolving tanks are subject to Rule 62-296.404. F.A.C., Kraft Pulp Mills and 40 CFR 63, Subpart MM – NESHAP for Chemical Recovery Combustion Sources.

(EU 004) Lime Kiln / NCG Collection. The Lime Kiln burns petroleum coke (petcoke) having a maximum sulfur content of 8.0% as the primary fuel, blended with natural gas, or No. 2 diesel fuel, or No. 6 fuel oil having a maximum sulfur content of 2.4% by weight. The maximum heat input rate for the petcoke burner system is 180 MMBtu/hr. For flame stability, petcoke is co-fired with fuel oil or natural gas and constitutes up to 90% of the kiln's maximum heat input rate. The Lime Kiln has a maximum operating rate of 85,000 pounds per hour of lime mud and is the primary control device for thermal destruction of the NCG from the MEE System and from the BDS. TRS, SO_2, nitrous oxides (NO_x), and PM emissions are controlled by a venturi wet scrubber manufactured by Chemico - followed by a cyclone. TRS and NO_x emissions are monitored with a CEMS. The Lime Kiln is

subject to 40 CFR 64 – Compliance Assurance Monitoring (CAM) Plan for SO_2, 40 CFR 63, Subpart MM – NESHAP for Chemical Recovery Combustion Sources, and Rule 62-296.404, F.A.C. The Lime Kiln controls emissions from affected units subject to 40 CFR 60, Subpart BB – NSPS for Kraft Pulp Mills, and 40 CFR 63, Subpart S – NESHAP for the Pulp and Paper Industry.

(EU 026) Multiple Effect Evaporator System. The system consists of a Pre-Evaporator, the No. 1A Evaporator Set, the No. 3 Evaporator Set, and associated equipment. The No. 1A Evaporator Set and the No. 3 Evaporator Set include two four-stage MEE Systems and associated condensers, hot wells, and concentrators. The evaporators are used to concentrate the weak black liquor prior to firing in the recovery boilers. The maximum operating rate is 359,400 pounds of dry black liquor solids per hour. The off-gases (TRS/HAP/VOC) from these sources are collected in the low volume high concentration (LVHC) NCG collection system. The NCG gases are primarily controlled by incineration in the Lime Kiln or in the No. 4 Combination Boiler, or in the No. 3 Combination Boiler used as backup. The MEE system is subject to Rule 62-296.404, F.A.C. and 40 CFR 63, Subpart S.

(EU 027) Digester System / NCG Handling System. These systems consist of 22 batch digesters, 5 blow tanks, an accumulator tank with both an upstream and a downstream condenser, and a turpentine recovery system (decanter, condenser, and storage tank). The off-gases (TRS/HAP/VOC) from these sources are collected in the LVHC NCG collection system. TRS/HAP/VOC emissions are primarily controlled by incineration in the Lime Kiln or in the No. 4 Combination Boiler, or in the No. 3 Combination Boiler, as backup. The digester system is subject to Rule 62-296.404, F.A.C., 40 CFR 60, Subpart BB – Kraft Pulp Mills, and 40 CFR 63, Subpart S – NESHAP for the Pulp and Paper Industry.

(EU 005) Lime Slaker. The Lime Slaker reacts lime (CaO) from the Lime Kiln and green liquor (Na_2CO_3, Na_2S, and Na_2SO_4) to form white liquor (NaOH and Na_2S) used for cooking wood chips. Lime mud is formed as a by-product that is recovered and regenerated back to lime in the Lime Kiln. The maximum operating rate is 81.6 tons per hour (tph) of green liquor solids and lime (60.39 tph green liquor and 21.18 tph lime). PM emissions are controlled by a wet walled cyclone scrubber. The Lime Slaker is subject to Rules 62-296.404, F.A.C., Kraft Pulp Mills and 62-296.320, F.A.C., General Pollutant Limiting Standards.

(EU 030) The Woodyard. The Woodyard receives hardwood chips, softwood chips, round wood (as short wood or long wood), scrap wood, and bark. Scrap wood and bark (as received or generated on-site by debarking round wood) are used in steam generation at the facility. The chipping process begins by passing logs through a de-barker to remove bark, which is collected and transferred via conveyors and hogged to obtain a desired size. After processing, the bark is stored in piles, transferred to the bark bin, and then used as fuel for the boilers at the facility. The logs are then chipped and the chips screened for proper size. Both purchased chips and manufactured chips are conveyed and stored in chip reclaimer storage piles. The facility has one softwood chip reclaimer storage pile and one hardwood chip reclaimer storage pile. Three cyclones associated with the bark transfer and conveying system are used to pneumatically convey the bark and to control PM emissions. Conveyors are covered and roads are paved and maintained to minimize PM entrainment. Four cyclones are used in the Screening Room to separate fines from the conveying air stream and to control PM emissions. The Woodyard is subject to Rules 62-296.320(4)(b)1 and 4, F.A.C. – General Pollutant Emission Limiting Standards.

(EU 033) The Bleach Plant. The Bleach Plant has a maximum process capacity of 1,250 tons per day (TPD) of air-dried unbleached hardwood pulp, and 1,050 TPD of air-dried unbleached softwood pulp. The Bleach Plant can operate on either hardwood or softwood pulp, but not both at the same time. The facility has a 40 TPD chlorine dioxide generator and associated chlorine dioxide storage tank. The bleaching towers have been modified to allow for a 100 percent chlorine dioxide substitution capability to comply with MACT standards. HAP/VOC emissions from the Bleach Plant are controlled with a wet alkaline scrubber (using weak wash or white liquor). A closed vent system is used to collect HAP/VOC emissions from the washers, the towers, and the filtrate tanks where chlorine or chlorinated compounds are used and then, subsequently, treated in the scrubber. The chlorine dioxide storage tank is vented to the chlorine dioxide plant scrubber. The bleaching system is subject to 40 CFR 63, Subpart S – NESHAP for the Pulp and Paper Industry.

(EU 034) The Pulping System. The Pulping System collects LVHC NCG from the turpentine decanter, the turpentine condenser, the turpentine storage tank, the foul condensate storage tank blow heat recovery, multiple effect evaporators, and the batch digester system; which are primarily combusted in the Lime Kiln or in the No. 4 Combination Boiler or the No. 3 Combination Boiler as backup. A steam-heated condensate stripper treats the foul condensate streams from the blow heat accumulator tank, the turpentine system, the pre-evaporator, and the NCG system. The stripper system has a design capacity of 500 gallons per minute and consists of the following equipment: a foul condensate storage tank, a fiber filter, a stripper feed preheater, a condensate stripper, a primary reflux condenser, and a trim condenser. The non-condensed vapors from the reflux condenser are routed to the trim condenser and finally to the No. 3 Combination Boiler or the No. 4 Combination Boiler for thermal destruction. The pulping system is subject to 40 CFR 60, Subpart BB and 40 CFR 63, Subpart S.

(EU 038) Petcoke Handling and Storage Silo. Ground petcoke is delivered to the Petcoke Handling and Storage Silo by truck and/or rail car where it is pneumatically loaded into the 250 ton silo. The silo is equipped with a baghouse to control PM emissions. The ground petcoke is dropped from the storage silo into a weigh bin, then transferred via an enclosed conveyor to the Lime Kiln where a blower and an educator are used to deliver the ground petcoke to the kiln burner. Displaced air from the weigh bin is redirected to the storage silo. Petcoke handling and storage is subject to Rules 62-296.320(4)(b)1 and 4, F.A.C. - General Pollutant Emission Limiting Standards.

(EU039) Emergency Reciprocating Internal Combustion Engines. The facility operates six emergency stationary reciprocating combustion engines (RICE): Old Diesel Fire Pump having a rating of 250 horsepower (Hp), New Diesel Fire Pump having a rating of 265 Hp, Caustic Area Generator having a rating of 156 Hp, Kiln Emergency Drive having a rating of 115 Hp, the Main Office Generator at 156 Hp, and the Engineering/Maintenance Building Generator at 15Hp. All of these engines have a rating of less than 500 Hp, are located at a major source of HAP emissions, and were constructed before June 12, 2006. Therefore, they are all existing emergency stationary RICE, pursuant to 40 CFR 63.6590(a)(1)(ii), and must comply with the emission limitations in Table 2c to Subpart ZZZZ of 40 CFR 63 – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

The existing facility consists of the following emissions units (EU).

EU No.	Emission Unit Description
Regulated Emissions Units	
001	No.1 Recovery Furnace
004	Lime Kiln / NCG Collection
005	Lime Slaker
015	No. 3 Combination Boiler
016	No. 4 Combination Boiler
019	No. 2 Recovery Furnace
020	No. 2 Smelt Dissolving Tank
021	No. 1 Smelt Dissolving Tank
026	Multiple Effect Evaporator System
027	Digester System / NCG Handling System
030	Woodyard
033	Bleach Plant
034	Pulping System
038	Petcoke Handling and Storage Silo

039	Emergency Reciprocating Internal Combustion Engines
Unregulated Emissions Units (See Appendix U, List of Unregulated Emissions Units and/or Activities	
031	Methanol Storage Tank
032	Papermaking / Warehousing
035	Pulping Area General
037	Chemical Recovery Area
NA	Facility-Wide Fugitives

PROPOSED PROJECT

On September 26, 2017, WestRock CP, LLC submitted an application to the Department to authorize:

- (EU 040): The construction of a new emission-controlled Brown Stock Washer System (System No. 1) and a high volume low concentration (HVLC) non-condensable gases (NCG) system to route the off-gases from the Brown Stock Washer System to either Recovery Furnace No. 1 or No.2 (EU 001 and EU 019) for destruction.

At EU 035 (Pulping Area General):

- The removal of four 2-stage B-Side emission- uncontrolled Brown Stock Washer Systems (Nos. 1, 2, 4, and 8);
- The removal of the Nos. 1, 2, and 3 B-Side Decker Systems, the Decker System overflow tank, the Hot Stock Tank, and the Brown Stock ST Tank; and
- The upgrade of operational controls at the Nos. 3 and 5 A-Side Brown Stock Washers.
- In addition, the applicant requested to be allowed:
  1. to change the method of operation of the 6A/6B Deckers to allow the Deckers to use stripped condensate as shower water, and
  2. to use filtrate from the Decker System as shower water on the Nos. 3 and 5 Brown Stock Washer Systems.

This project will add and/or modify the following emissions units.

EU No.	Emission Unit Description
040	Brown Stock Washer System No. 1
035	Pulping Area – General (Unregulated)

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility operates units subject to the New Source Performance Standards (NSPS) of Title 40 Part 60 of the Code of Federal Regulations (40 CFR 60).
- The facility operates units subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

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SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northwest District Office of the Department of Environmental Protection (Department). The District Office mailing address is 160 W. Government Street, Suite 308, Pensacola, Florida 32502 - 5740. All documents related to applications for permits to operate an emissions unit shall be submitted to the District Office at the above address or by electronic mail at epost_nwdwasteair@dep.state.fl.us.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northwest District Office at: 160 W. Government Street, Suite 308, Pensacola, Florida 32502 – 5740. All documents related to applications for permits to operate an emissions unit shall be submitted to the District Office at the above address or by electronic mail at nwdair@dep.state.fl.us and copied to epost_nwdwaseair@dep.state.fl.us.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); Appendix D (Common Testing Requirements); Appendix E (40 CFR 60, Subpart A - General Provisions); Appendix F (40 CFR 60, Subpart BBa - Performance for Kraft Pulp Mill Affected Sources for Which Construction, Reconstruction, or Modification Commenced After May 23, 2013); Appendix G, (40 CFR 63, Subpart A – General Provisions); Appendix H (40 CFR 63, Subpart MM – NESHAP for Chemical Recovery Combustion Sources); and Appendix I – (40 CFR 63, Subpart S – NESHAP for the Pulp and Paper Industry).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Source Obligation:

   a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

9. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050 and 62-213, F.A.C.]

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This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
040	Brown Stock Washer System (System No. 1)

This permit proposes the construction of an emission-controlled Brown Stock Washer System (System No. 1) along with a HVLC NCG system to convey the off-gases from the washer to either Recovery Furnace No.1 or No. 2. Minor physical additions/changes in equipment will also be required such as: three new filtrate tanks with new foam breakers and filtrate pumps will be built at grade level under the new washer line; a new MC Pump and standpipe will pump washed pulp from the new washer to an existing 300T HD pulp storage tank; the existing agitator in the HD dilution zone will be replaced to improve consistency control; and the pulp feed system will also be modified.

The Recovery Furnaces will serve as the control device for NCG from the new brown stock washer system. While a small increase of SO_2 emissions will occur from incineration of the HVLC gases in the Recovery Furnaces, completion of the project will result in a large reduction of emissions of VOCs, Hazardous Air Pollutants (HAPs), total reduced sulfur (TRS), and hydrogen sulfide (H_2S) due to the proposed concomitant removal of several emissions units and changes in process conditions at equipment comprising EU 035 (Pulping Area General).

This emission unit is subject to 40 CFR 60, Subpart BBa (Performance for Kraft Pulp Mill Affected Sources for Which Construction, Reconstruction, or Modification Commenced After May 23, 2013) (not adopted by the Department as of the date of this writing); and 40 CFR 63 Subpart S – NESHAP for the Pulp and Paper Industry.

EQUIPMENT

1. Brown Stock Washer System No. 1: The permittee is authorized to construct and install the Brown Stock Washer System No. 1, including required minor physical additions and changes in equipment associated with the unit. [Application 0050009-044-AC]

2. High Volume Low Concentration (HVLC) System: The permittee is authorized to install an enclosed HVLC non-condensable gases (NCG) collection system and ancillary equipment to convey the NCG from the washer to either Recovery Furnace No.1 or No. 2 for destruction. The HVLC system will be constructed to meet the requirements of 40 CFR 63.450. [Application No. 0050009-044-AC]

3. HVLC System: Standards for enclosures and closed-vent systems. Each enclosure and closed vent system for capturing and transporting vent streams that contain HAP shall meet the requirements detailed in the following paragraphs:

    a. Each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in 40 CFR 63.457(e). Each enclosure or hood opening closed during the initial performance test specified in 40 CFR 63.457(a) shall be maintained in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs.

    b. Each component of the closed-vent system used to comply with 40 CFR 63.443(c). 63.444(b), and 445(b) that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 ppm by volume above background, as measured by the procedures specified in 40 CFR 63.457(d).

    c. Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in 40 CFR 63.443, 63.444, or 63.445 shall comply with either of the following requirements:

        i. On each bypass line, the permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a flow indicator that is capable of taking periodic readings as

frequently as specified in 40 CFR 63.454(e). The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line; or

ii. For bypass line valves that are not computer controlled, the permittee shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that the valve or closure mechanism cannot be opened without breaking the seal.

[Rule 62-204.800(11)(b)12, F.A.C. and 40 CFR 63.450]

PERFORMANCE RESTRICTIONS

4. Restricted Operation: The hours of operation are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

5. Mode of Operation: The non-condensable gases from the Washer System No. 1 will be routed via the new HVLC system to either the No.1 or No. 2 Recovery Furnace for destruction. [Rule 62-4.070(3), F.A.C. and Application No. 0050009-044-AC]

EMISSION STANDARDS

6. Emissions Standards: Standards for Total Reduced Sulfur (TRS) shall be met by having the off-gases collected in an HVLC closed-vent system meeting the requirements of §63.450 and combusted with other waste gases in a recovery furnace not subject to the provisions of §63.283a(a) (or Subpart BB), and shall be subjected to a minimum temperature of 650ºC (1200 ºF) for at least 0.5 seconds.

   [Rule 62-204.800(11)(b)12, F.A.C. and 40 CFR 60.283a(1)(a)(iii)]

   {Permitting Note: During normal operation of the Brown Stock Washer System, gases will be conveyed via the new HVLC system to either Recovery Furnace No. 1 or No. 2, which will serve as emission control devices for the Washer System. Off gases from the washer system will be destructed in the recovery furnaces, which are subject to Rule 62-296.404(3)(c)1.(a), F.A.C.}

TESTING REQUIREMENTS

{Permitting Note: emissions testing for this emissions unit is not required by 40 CFR 63.457 because the emissions are routed to Recovery Furnaces 1 or 2, meeting the requirement in 40CFR 63.443(d)(4)(i)}

MONITORING REQUIREMENTS

7. Enclosure and Closed-Vent System. Each enclosure and closed-vent system shall comply with the requirements specified in the following paragraphs:

   a. For each enclosure opening, a visual inspection of the closure mechanism specified in Part 63.450(b) shall be performed at least once every *calendar month* to ensure the opening is maintained in the closed position and sealed.

   b. Each closed-vent system required by Part 63.450(a) shall be visually inspected every *calendar month* and at other times as requested by the Administrator. The visual inspection shall include inspection of the ductwork, piping, enclosures, and connections to covers for visible evidence of defects.

   c. For positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in Part 63.450(c) measured initially and annually by the procedures in Part 63.457(d).

   d. Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in Part 63.457(e).

   e. The valve or closure mechanism specified in Part 63.450(d)(2) shall be inspected at least once every *calendar month* to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

f. If an inspection required by paragraphs (a) through (e) above identifies visible defects in ductwork, piping, enclosures, or connections to covers required by Part 63.450, or if an instrument reading of 500 ppm by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable.

   i. A first effort to repair the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified.

   ii. The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the permittee determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

[Rule 62-204.800(11)(b)12, F.A.C. and 40 CFR 63.453(k); and Department letter, dated December 14, 2006, "Alternative Monitoring Procedure, using calendar month instead of 30 days, as allowed by 40 CFR 63.8(f)"]

{Permitting Note: the existing recovery furnaces 1 and 2 already meet applicable monitoring requirements of §63.453for TRS CEMS}

RECORDS AND REPORTS

8. Recordkeeping Requirements. The permittee of each affected source subject to the requirements of this subpart shall comply with the recordkeeping requirements of Part 63.10, as shown in Table 1, below, and the requirements specified in paragraphs (a) through (f) of this section for the monitoring parameters specified in Standard Condition (SC) 7, above.

   a. For each applicable enclosure opening, closed-vent system, and closed collection system, the permittee shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable equipment and shall record the following information for each inspection.

      i. Date of inspection;

      ii. The equipment type and identification;

      iii. Results of negative pressure tests for enclosures;

      iv. Results of leak detection tests;

      v. The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection);

      vi. The date the defect or leak and the date of each attempt to repair the defect or leak;

      vii. Repair methods applied in each attempt to repair the defect or leak;

      viii. The reason for the delay if the defect or leak is not repaired within 15 days after discovery;

      ix. The expected date of successful repair of the defect or leak if the repair is not completed within 15 days,

      x. The date of successful repair of the defect or leak;

      xi. The position and duration of opening of bypass line valves and the condition of any valve seals; and

      xii. The duration of the use of bypass valves on computer controlled valves.

   b. The permittee shall set the flow indicator on each bypass line to provide a record of the presence of gas stream flow in the bypass line at least once every 15 minutes.

[Rule 62-204.800(11)(b)12, F.A.C. and 40 CFR 63.454(a), (b), and (e)]

9. Recordkeeping of Malfunctions. The permittee must maintain the following records of malfunctions.
   a. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
   b. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

   [Rule 62-204.800(11)(b)12, F.A.C. and 40 CFR 63.454(g)]

10. Table 1 to NESHAP Subpart S (attached) indicates which parts of the General Provisions apply to you.

    [Rule 62-204.800(11)(b)12, F.A.C. and 40 CFR 63.455]

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B. EU 035 Pulping Area - General

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
035	Pulping Area - General

{Permitting Note: While this emission unit is unregulated, the proposed retirement and removal of equipment that comprise the unit and the proposed changes to process conditions affect overall facility emissions. These proposed changes are discussed below}

EU 035 – Facility-wide, unregulated, Pulping Area General. The pulping area is separated into two sides. The B-Side consists of a high-yield liner softwood section and a hardwood fiber-line; the A-Side consists of a bleached softwood fiber-line. The proposed changes to EU 035 are as follows:

- The removal of four 2-stage B-Side emission- uncontrolled Brown Stock Washer Systems (Nos. 1, 2, 4, and 8);
- The removal of the B-Side Nos. 1, 2, and 3 Decker Systems, the Decker System overflow tank, the Hot Stock Tank, and the Brown Stock ST Tank;
- The upgrade of operational controls at the Nos. 3 and 5 A-Side Brown Stock Washers
- In addition, the applicant requested to be allowed:
  1. to change in the method of operation of the 6A/6B Deckers to allow the Deckers to use stripped condensate as shower water, and
  2. to use filtrate from the Decker System as shower water on the Nos. 3 and 5 Brown stock Washer Systems.

According to the Applicant, the proposed control upgrades to the Nos. 3 and 5 Brown Stock Washer Systems and replacement of minor components will not change the basic design parameters or capacities of the washer systems. The physical changes are being performed to replace antiquated components or to replace components with 'like-kind' or current 'best practice' design to perform an equivalent function, or are being performed to optimize washer efficiency.

EQUIPMENT

1. Equipment Removal: Permittee shall remove:
   a. The four 2-stage B-Side emission- uncontrolled Brown Stock Washer Systems (Nos. 1, 2, 4, and 8);
   b. the B-Side Nos. 1, 2, and 3 Decker Systems, the Decker System overflow tank, the Hot Stock Tank, and the Brown Stock ST Tank;

   [Rule 62-4.070(3), F.A.C. and Application No. 0050009-044-AC]
2. Equipment Operation Changes: Permittee to make the following operating changes:
   a. change the method of operation of the 6A/6B Deckers to allow the Deckers to use stripped condensate as shower water, and
   b. use filtrate from the Decker System as shower water on the Nos. 3 and 5 Brown stock Washer Systems.

   [Rule 62-4.070(3), F.A.C. and Application No. 0050009-044-AC]

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