FLORIDA DEPARTMENT OF
Environmental Protection

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Secretary

PERMITTEE

WestRock CP, LLC
North 8th Street
Fernandina Beach, Florida 32034

Authorized Representative:
Daniel C. Rowland, General Manager

Air Permit No. 0890003-060-AC
Permit Expires: December 31, 2021
Minor Air Construction Permit
Fernandina Beach Mill
No. 4 and No. 5 Recovery Boilers Natural Gas Igniter Project

PROJECT

This is the final air construction permit, which authorizes the installation and operations of natural gas igniters on the No. 4 and No. 5 Recovery Boilers and to increase the hours of operation of the No. 5 Recovery Boiler from 8,568 hours/year to 8,760 hours/year, unrestricted. The proposed work will be conducted at the existing Fernandina Beach Mill, which is a paperboard mill and manufacturers corrugated and solid fiber boxes categorized under Standard Industrial Classification Nos. 2631 and 2653. The existing facility is in Nassau County at North 8th Street in Fernandina Beach, Florida. The UTM coordinates are Zone 17, 356.2 kilometers (km) East and 3394.1 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 Tallahassee, Florida

David Lyle Read, P.E.
2018.12.13 08:49:42 -05'00'

For:
Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction 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. Daniel C. Rowland, General Manager, WestRock: Daniel.Rowland@westrock.com
Ms. Michele Rundlett, Environmental Manager, WestRock: Michele.Rundlett@westrock.com
Ms. Sheryl Watkins, P.E., AECOM: Sheryl.Watkins@aecom.com
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Mr. Brian Durden, Program Manager, NED: Brian.Durden@dep.state.fl.us
Ms. Lynn Scearce, DEP OPC: Lynn.Scearce@dep.state.fl.us

Clerk Stamp

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.

Lynn Scearce Digitally signed by Lynn Scearce
Date: 2018.12.13 09:32:18 -05'00'

FACILITY DESCRIPTION

WestRock CP, LLC (WestRock) operates a fully integrated Kraft linerboard mill (the Mill). The Mill produces linerboard from wood pulp and pulp derived from recycled corrugated containers, which is then sold to customers for converting into corrugated containers. The manufacturing processes at the Mill consists of the following major plant operations: wood yard, pulp mill, recycle plant, chemical recovery, power house, and paper mill. A container plant (box plant) also operates onsite, converting linerboard into corrugated containers. The major fuel burning sources at the mill consist of two power boilers, two recovery boilers, and one lime kiln.

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

EU No.	Brief Description
Regulated Emissions Units	
006	No. 5 Power Boiler
007	No. 4 Recovery Boiler
011	No. 5 Recovery Boiler
013	No. 4 Smelt Dissolving Tank
014	No. 5 Smelt Dissolving Tank
015	No. 7 Power Boiler
020	Tall Oil Plant
021	No. 4 Lime Kiln
024	C-Line Brownstock Washer System
033	Pulping System MACT I
035	Wide-web Flexographic Printers
038	John Deere 210 Brake Horsepower (BHP) Diesel Engine- Model JU6H-UF50
039	Caterpillar 292 BHP Diesel Engine– Model 3406c
040	Caterpillar 292 BHP Diesel Engine – Model 3406c
041	Coal Handling System
042	John Deere, Diesel Engine (125 BHP) – Model 6466DF-00
043	Wisconsin, Gasoline Engine (65 BHP) – Model V465D
Unregulated Emissions Units and Activities	
025	Wood yard
026	Brownstock Washing
028	Chemical Recovery Area
031	Secondary Fiber Pulp
032	Papermaking
044	Temporary Rental Package Boiler - 99.5 million British thermal unit/hour (MMBtu/hour)

PROPOSED PROJECT

WestRock is proposing to install six-12 million British thermal units per hour (MMBtu/hour) natural gas igniters on the No. 4 and No. 5 Recovery Boilers. The natural gas igniters will be used during startup, shutdown and flame stabilization during load changes of the recovery boilers. According to the applicant, the natural gas igniters are needed to reduce the startup time and hazardous operating conditions. The project will be completed at the end of WestRock's 2-year budget cycle.

In addition, WestRock is requesting to increase the No. 5 Recovery Boiler annual operating hours from 8,568 hours/year to 8,760 hours/year, unrestricted. The increase in the hours of operation will provide flexibility for the recovery boiler to operate during longer time periods between annual outages.

The following existing emissions units will be affected by this project.

EU No.	Description
007	No. 4 Recovery Boiler
011	No. 5 Recovery Boiler

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 does operate 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 does operate units subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northeast District Office at: 8800 Baymeadows Way West, Suite 100, Jacksonville, FL 32256-7590.

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); and Appendix D (Common Testing Requirements).

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 Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. No. 4 and No. 5 Recovery Boilers (EU 007 and EU 011)

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
007	No. 4 Recovery Boiler
011	No. 5 Recovery Boiler

The No. 4 and No. 5 Recovery Boilers are low odor design boilers authorized to fire black liquor solids (BLS) with or without hot caustic extract (HCE), and ultra-low sulfur No. 2 fuel oil. The No. 2 fuel oil may contain on-specification used oil. Steam produced from the boilers are used throughout the Mill. This project will include the firing of natural gas during startup, shutdown and flame stabilization during load changes of the recovery boilers.

The No. 4 Recovery Boiler has a maximum operational rate of 137,500 lb/hour of BLS (68.75 tons/hour of BLS), produces 492,000 lb/hour of high-pressure (quality) steam flow and is permitted to operate 8,760 hours/year. The No. 5 Recovery Boiler has a larger operational rate of 156,780 lb/hour of BLS (78.39 tons/hour of BLS), provides 495,700 lb/hour of high-pressure (quality) steam flow to the Mill and is permitted to operate 8,568 hours/year. The applicant is requesting to increase the hours operation to 8,760 hours/year to allow the flexibility for the recovery boiler to operate during a longer time period between annual outages.

Emissions of total reduced sulfur (TRS) from both recovery boilers are controlled by the low-odor boiler design. TRS and sulfur dioxide (SO_2) emissions are continuously monitored by a continuous emissions monitoring systems (CEMS). Particulate matter is controlled by electrostatic precipitators (ESP). Visible emissions from each stack are continuously monitored by a continuous opacity monitoring system (COMS).

{Permitting Note: These emission units are regulated under Rule 62-296.404, F.A.C. for Kraft Pulp Mills; NESHAP Subpart A (General Provisions) and Subpart MM (NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills) of 40 CFR 63, adopted and incorporated under Rule 62-204.800, F.A.C.; and the No. 5 Recovery Boiler is regulated under NSPS Subparts A (General Provisions) and BB (Standards of Performance for Kraft Pulp Mills) of 40 CFR 60, adopted and incorporated under Rule 62-204.800, F.A.C.}

EXISTING PERMIT CONDITIONS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for these emissions units. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]

EQUIPMENT

2. No. 4 and No. 5 Recovery Boilers: The permittee is authorized to install and operate six 12 MMBtu/hour natural gas igniters on each recovery boiler. The natural gas igniters shall operate only during startup, shutdown and for flame stabilization. The natural gas igniters will meet the following specifications:

   a. HR2 with SRX Plasma Arc Ignition, Model No. 9000-2130 (or equivalent to).

   b. Maximum heat release rate of 12 MMBtu/hour.

   c. Maximum flow rate of 12,000 standard cubic feet per hour.

   d. Fuel pressure range between 2 – 14 pounds per square inch gauge.

   e. 4.0-inch guide tube diameter.

   f. 2:1 turndown.

   [Design, Application No. 0890003-060-AC]

PERFORMANCE RESTRICTIONS

3. Authorized Fuels: The following fuels are permitted to be fired in the No. 4 and No. 5 Recovery Boilers:

   a. Natural gas may be fired during startup, shutdown and for flame stabilization during load changes.

   b. As restricted in the permittees Title V air operation permit, BLS (with or without HCE), No. 2 fuel oil and on-specification used oil may be mixed with the No. 2 fuel oil.

   [Rule-62-4.070, F.A.C.; and Permit Nos. 0890003-010-AC, 0890003-027-AC, 0890003-046-AC, and 0890003-050-AC; and Application No. 0890003-060-AC]

RECORDS AND REPORTS

4. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions for nitrogen oxide (NO_X) emissions.

   a. The permittee shall 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, calculate and maintain a record of the annual emissions, in tons/year on a calendar year basis, for a period of 10-years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

   b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 10-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

      (1) The name, address and telephone number of the owner or operator of the major stationary source;

      (2) The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;

      (3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and

      (4) Any other information that the owner or operator wishes to include in the report.

   c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

   d. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual NO_X emissions for the No. 4 and No. 5 Recovery Boilers:

      (1) Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions of NO_X as used in the application for all fuels fired. When calculating the actual annual emissions of NO_X, the permittee shall use the following information obtained from each recovery boiler: tons of BLS fired; gallons of No.2 fuel oil used, with or without on-specification used oil; standard cubic feet of natural gas fired; and the total hours of operation of each fuel fired.

      (2) As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

   {Permitting Note: Baseline emissions for NO_X was determined to be 526 tons/year and what the unit could have accommodated was 84.7 tons/year.}

   [Rules 62-212.300(1)(e) and 62-210.370, F.A.C.; and Application No. 0890003-060-AC]

5. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(10), F.A.C.]

NEW PM EMISSION LIMIT

The below PM emission limits for the No. 5 Recovery Boiler replace all previous PM emission limits for the boiler.

6. Particulate Matter Emissions: The Permittee shall ensure that the concentration of particulate matter in the exhaust gases discharged to the atmosphere is less than or equal to 0.98 gram per dry standard cubic meter (g/dscm) (0.043 grain per dry standard cubic foot (gr/dscf)) corrected to 8 percent oxygen; 81.5 lbs/hr and 356.9 TPY.

PERMITS BEING MODIFIED

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight. Except for the modified conditions noted below, all other previously established permits and conditions remain in effect.

Permit Nos. PSD-FL-002 and 0890003-010-AC

7. Subsection C, Specific Condition C.3, No. 5 Recovery Boiler (EU 011):

   C.3. Hours of Operation. The hours of operation are not limited (8,760 hours/year)~~for this emissions unit shall not exceed 8568 hours/year~~. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; ~~Construction Permit No. 0890003-010-AC~~and Application No. 0890003-060-AC]

Permit No. 0890003-046-AC

8. Section 3, Subsection C, Specific Condition 2, No. 4 and No. 5 Recovery Boilers (EU 007 and EU 011):

   2. SO_2 Emission Standard. Effective January 1, 2018, SO_2 emissions from each recovery boiler shall not exceed 150.0 lb/hour based on a 3-hour block average and 642.6 tons/year, rolled monthly, as determined by data collected from a certified CEMS or other methods approved by the Division of Air Resource Management. Alternatively, the permittee may elect to comply with the following combined SO_2 emissions cap: Effective January 1, 2018, combined SO_2 emissions from the Nos. 4 and 5 recovery boilers shall not exceed 300.0 lb/hour based on a 3-hour block average as determined by data collected from a certified CEMS. Note that compliance with the combined SO_2 emissions cap must be demonstrated by certified CEMS data.

   {Permitting Note: This new emissions standard reduces SO_2 emissions and ambient impacts in and around the SO_2 non-attainment area in Nassau County.}

   [Rules 62-4.070(3) and 62-4.080, F.A.C.; SO_2 Attainment SIP; and Application No. 0890003-060-AC]