



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

BOB MARTINEZ CENTER
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

April 23, 2015

Sent by Electronic Mail – Received Receipt Requested

tsweetser@rocktenn.com

Mr. Thomas Sweetser, General Manager
RockTenn CP, LLC (RockTenn)
Fernandina Beach Mill
Facility ID No. 0890003
North 8th Street
Fernandina Beach, Florida 32034

Re: Fernandina Beach, Florida Mill – No. 7 Power Boiler
Boiler MACT Compliance Date Extension
Project No. 0890003-048-AV
Request for Additional Information (RAI)

Dear Mr. Sweetser:

On April 10, 2015 the Department received your letter request¹ and Title V revision application for a one-year extension of the Boiler MACT² compliance date for the No. 7 Power Boiler at the Fernandina Beach Mill. The current compliance date is January 31, 2016 and the requested new compliance date is January 31, 2017.

Included in the extension request was information on the chlorine content of the coal fired in the No. 7 Power Boiler. RockTenn believes that it will be unable to comply with the hydrogen chloride (HCl) emissions limit in the Boiler MACT of 0.022 pounds per million British thermal units (lb/MMBtu) approximately 25 percent of the time the boiler is in operation due to receiving periodic coal shipments with high levels of chlorine.

To address this issue, RockTenn plans to install additional natural gas burners in the No. 7 Power Boiler so that more natural gas can be fired in the boiler displacing some coal firing when high-chlorine content coal is fired. RockTenn also indicated in the extension request that due to a long lead time in procuring the natural gas burners, the current Boiler MACT compliance date of January 31, 2016 cannot be met. Consequently, RockTenn has requested a 1-year compliance extension to have sufficient time to engineer, procure and install the natural gas burners. It is unclear whether RockTenn has requested that the 1-year extension to cover all other emission limits (particulate matter or total select metals, mercury and carbon monoxide) and associated applicable requirements in the Boiler MACT or only the HCl emissions limit and associated requirements.

¹ [Link to DEF Letter Request and Title V Application.](#)

² 40 Code of Federal Regulations, Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. [Link to 40 CFR 63, Subpart DDDDD.](#)

Additional information is required to consider your request. Please provide the information requested below (as well as any other information you may wish to provide) within 30 calendar days of this request for information.

1. Compliance Extension for other Boiler MACT Pollutants. It appears from your request that you may be asking for a one year compliance date extension for all emission limits, work practice standards, initial performance testing, monitoring, recordkeeping, reporting and other requirements applicable to the No. 7 Power Boiler under Boiler MACT. However, the extension letter only indicates that the No. 7 Power Boiler will be unable to comply with the HCl emissions standard. When an affected unit is unable to comply with MACT requirements, an extension may be granted for up to one year for the purpose of installing controls. If you are indeed requesting a one year extension for all emission limits (and associated requirements), please justify why a compliance extension for all other pollutants and associated applicable requirements is necessary for the No. 7 Power Boiler at the Fernandina Beach Mill.
2. Natural Gas Burner Vendor Information. Please provide information from prospective natural gas burner vendors indicating that, due to demand, there is a 34-to 52-week delay from the date when the burner order is placed until the burners can be delivered to the Fernandina Beach Mill.
3. Fernandina Beach Mill's Annual November 2016 Outage. RockTenn indicates in the extension letter request that the natural gas burners will be delivered to the Fernandina Beach Mill in March 2016, but that the burners will not be installed until early November 2016 during a planned facility outage. Please provide information to the Department justifying this 7-month delay between equipment delivery and installation. Please specify the reasons that the planned mill outage cannot be moved to an earlier period in the year or the burners installed prior to the scheduled outage.
4. Annual HCl Emissions Limit. RockTenn states in its extension letter request that the coal suppliers are willing to provide a chlorine content guarantee for all coal shipments on an *annual average basis* that will meet the Boiler MACT HCl emissions standard. In consideration of a one-year extension for HCl requirements, the Department may specify an interim HCl limit for the No. 7 Power boiler of 0.022 lb/MMBtu based on data collected consistent with the Boiler MACT over the one-year extension period. Please comment.

If you have any questions regarding this request, please contact David Read, P.E., at 850-717-9075.

Sincerely,

For:

Jeffery F. Koerner, Deputy Director
Division of Air Resource Management

cc: Thomas Sweetser, RockTenn: tsweetser@rocktenn.com
Michele Rundlett, RockTenn: mrundlet@rocktenn.com
David A. Buff, P.E., Golder and Associates: dbuff@_golder.com