



**ONE BUCKEYE DRIVE  
PERRY, FLORIDA 32348-7702**

January 16, 2015

Jeffery F. Koerner  
Program Administrator, Office of Permitting and Compliance  
Florida Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Re: Foley Cellulose LLC  
Facility ID No. 1230001  
Construction Permit Application for Proposed Modifications to the Nos. 1 and 2  
Bark Boilers for Boiler MACT Compliance**

Dear Mr. Koerner,

Foley Cellulose LLC operates a Kraft pulp mill (referred to as the “Foley Mill”) located in Perry, Taylor County, Florida. The Foley Mill operates under a Title V Major Source Operating Permit (No. 1230001-045-AV), most recently issued by the Florida Department of Environmental Protection (FDEP) on August 19, 2014. A Title V Operating Permit renewal application was submitted to FDEP on August 27, 2014, as required by the existing Title V permit. The Foley Mill is currently working with FDEP to finalize the Title V renewal permit.

The Foley Mill is submitting the enclosed construction permit application to seek authorization to modify the Nos. 1 and 2 Bark Boilers to meet the requirements of Subpart DDDDD of the National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (commonly known as the Boiler Maximum Achievable Control Technology [MACT] rule).

The Foley Mill has elected to comply with the hybrid suspension grate (HSG) boiler subcategory provisions of the Boiler MACT rule for both the No. 1 Bark Boiler and the No. 2 Bark Boiler. With this application, changes are being proposed to both bark boilers that will result in each boiler meeting the definition of an HSG boiler. These changes include:

- Discontinuing use of the bark dryer that currently dries bark fuel for both boilers;
- Replacing the existing mechanical fuel spreaders with air swept fuel distributors on the No. 1 Bark Boiler;
- Removing four of the eight existing No. 6 fuel oil-fired auxiliary burners on the No. 1 Bark Boiler and adding two or four natural gas burners;
- Installing a new economizer on the No. 2 Bark Boiler to capture the energy that was previously used in the bark dryer;
- Either replacing the two existing fuel oil-fired auxiliary burners on the No. 2 Bark Boiler with dual-fuel natural gas and fuel oil burners or keeping these burners and adding two natural gas burners.

Engineering work in support of the projects is ongoing and is expected to continue throughout 2015. The Boiler MACT rule has an existing source compliance date of January 31, 2016. Concurrent with this application, but under separate cover, the Foley Mill is requesting a compliance extension for the No. 1 Bark Boiler until October 1, 2016, and for the No. 2 Bark Boiler until December 1, 2016.

As shown in the enclosed application, the emission increases for all Prevention of Significant Deterioration (PSD) regulated pollutants are less than the applicable significant emission rates. Therefore, PSD permitting is not required for the proposed projects. However, a state construction permit is required for the proposed modifications pursuant to Rules 62-210.300, and 62-212.300 of the Florida Administrative Code.

The Foley Mill has enclosed four (4) copies of the permit application that include a detailed description of the proposed projects and the regulatory implications. In addition, FDEP's Air Construction Permit Application – Long Form is provided as Appendix C to the permit application.

We appreciate the FDEP's review of the enclosed permit application and accompanying Boiler MACT compliance extension request. If you have any questions, please do not hesitate to contact Brooks Butler at (850) 584-1626 or [brooks.butler@gapac.com](mailto:brooks.butler@gapac.com).

Sincerely,



Lee Davis  
Vice President – General Manager  
Foley Cellulose LLC

cc: Richard S. Rachal, P.G. (FDEP)