Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

November 7, 2016

(Sent by Electronic Mail – Return Receipt Requested)

Mr. C.A. McDonald, General Manager
Rayonier Performance Fibers, LLC
PO Box 2002
Fernandina Beach, Florida 32035

Re: Title V Air Operation Permit Renewal
Proposed Permit No. 0890004-048-AV
Fernandina Beach Dissolving Sulfite Pulp Plant

Dear Mr. McDonald:

One copy of the proposed permit determination for the renewal of the Title V air operation permit for the Fernandina Beach Dissolving Sulfite Pulp Plant located at 10 Gum Street, Fernandina Beach, Nassau County, is enclosed. This letter is only a courtesy to inform you that the draft permit has become a proposed permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is: https://fldep.dep.state.fl.us/air/emission/apds/default.asp

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation permit is made by the USEPA within 45 days, the proposed permit will become a final permit no later than 55 days after the date on which the proposed permit was mailed (posted) to USEPA. If USEPA has an objection to the proposed permit, the final permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact the project engineer, Rita Felton-Smith, at (904) 256-1556 or email, Rita.Felton-Smith@dep.state.fl.us.

Executed in Jacksonville, Florida.

Richard S. Rachal III, P.G.
Permitting Program Administrator

RSR/JH/rfs

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I. PUBLIC NOTICE

An Intent To Issue Air Permit issued to Rayonier Performance Fibers, LLC for the Fernandina Beach Dissolving Sulfite Pulp Plant located at 10 Gum Street, Fernandina Beach, Nassau County, was clerked on August 19, 2016.

The Public Notice Of Intent To Issue Air Permit was published in News-Leader on September 28, 2016. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Jacksonville, Florida. Proof of publication of the Public Notice of Intent To Issue Air Permit was received on September 28, 2016.

II. PUBLIC COMMENTS

No Comments were received from the public during the 30-day public comment period; however, comments were received from the Permittee prior to publication (submitted September 23, 2016 and resubmitted November 1, 2016). The comments were not considered significant enough to reissue the draft Title V air operation permit and require another Public Notice; therefore, the draft Title V air operation permit was changed. Those comments are addressed below. Additions to the permit are indicated by a double underline. Deletions from the permit are indicated by a ~~strike through~~.

The key comments contained in the letter are condensed, repeated or paraphrased (in italics) below and followed by the Department's response.

1. **Pg. 3 of 97**: In the table of applicable regulations, we believe that EU 006, 022, 025 and 026 should also be included as being applicable for 40 CFR 63, Subpart A, since these emissions units are subject to a NESHAP.

   Department Response. The Department agrees with the comment and EU 006, 022, 025 and 026 have been added to the table of Applicable Regulations as being applicable for 40 CFR 63, Subpart A.

2. **Pg. 7 of 97: Condition FW11**. We believe the 5-year reporting period for permit no. -027-AC (Recovery Boiler steam drum replacement) has been satisfied. If confirmed, it is requested that references to permit no. 0890004-027-AC be removed from this condition.

   Department Response. The references to Permit No. 0890004-027-AC have been removed from the condition as requested.

3. **Pg. 21 of 97: Subsection C- Emissions Unit 022**. In the Brief Description, paragraph five, the description of the acid gas scrubber should be clarified to state that it is for SO2 control only, not HCl control. Suggested wording is as follows:

   Acid gases SO2 emissions are controlled by a wet alkaline scrubber located after the ESP and induced draft fan. The wet scrubber sprays re-circulated alkaline scrubber water over a series of chevrons and louver-type packing to reduce acid gas SO2 emissions. The design pressure drop across the system is approximately 2 inches of water column.

   Department Response. After review of the emission unit description in the underlying Construction Permit Nos. 0890004-018-AC and 0890004-021-AC, the Department agrees with the comment and has corrected the language in paragraph five of Emissions Unit 022 description as requested.

4. **Pg. 23 of 97: Subsection C- Emissions Unit 022. Condition C.6.d.** It is requested that the optional emission limits under Subpart DDDDD be added to this condition:

   PM- 0.14 lb/MMBtu steam output or 1.6 lb/MWh

   It should also be stated that "PM emissions shall be determined in accordance with Condition C.52."

   Department Response. Based on 40 CFR 63.7500(a)(1), the emission standards in the lb/MWh units are only for boilers that generate only electricity. The emission standards in the lb/MMBtu steam output units are only for boilers that generate either steam, cogenerate steam with electricity, or both. The lb/MMBtu steam output units are also applicable to boilers that perform multiple functions (cogeneration and electricity generation) or supply steam to common headers.

Based on the comment, Condition C.6.d. is revised as follows:

d. As determined by performance (stack) testing in accordance with Condition **C.52.**, Filterable PM emissions shall not exceed 0.11 lb/MMBtu of heat input or the alternative output-based limits of 0.14 lb/MMBtu of steam output or 1.6 lb/MWh output. This requirement shall be met at all times the boiler is operating except during periods of startup and shutdown during which time you must comply only with items in **Conditions C.17 and C.18.**

The output-based emission limits, in units of pounds per million Btu of steam output, in Table 2 to 40 CFR 63 Subpart DDDDD are an alternative applicable only to boilers and process heaters that generate either steam, cogenerate steam with electricity, or both. The output-based emission limits, in units of pounds per megawatt-hour, in Table 2 to 40 CFR 63 Subpart DDDDD are an alternative applicable only to boilers that generate only electricity. Boilers that perform multiple functions (cogeneration and electricity generation) or supply steam to common headers would calculate a total steam energy output using Equation 21 of 40 CFR 63.7575 to demonstrate compliance with the output-based emission limits, in units of pounds per million Btu of steam output, in Table 2 to 40 CFR 63 Subpart DDDDD.

[Table 2, 9.b. of 40 CFR 63 Subpart DDDDD, 40 CFR 63.7500(a)(1), Rule 62-204.800(11)(b)104., F.A.C.]

5. **Pg. 26 of 97: Subsection C- Emissions Unit 022. Condition 11.d.** It is requested that the optional emission limits under Subpart DDDDD be added to this condition:

Mercury- 6.4E-06 lb/MMBtu steam output or 7.3E-05 lb/MWh

It should also be stated that "Mercury emissions shall be determined in accordance with Condition C.52."

Department Response. Based on 40 CFR 63.7500(a)(1), the emission standards in the lb/MWh units are only for boilers that generate only electricity. The emission standards in the lb/MMBtu steam output units are only for boilers that generate either steam, cogenerate steam with electricity, or both. The lb/MMBtu steam output units are also applicable to boilers that perform multiple functions (cogeneration and electricity generation) or supply steam to common headers.

Based on the comment, Condition C.11.d. is revised as follows:

d. As determined by performance (stack) testing in accordance with **Condition C.52.**, Mercury emissions from the boiler shall not exceed 5.7E-06 lb/MMBtu heat input or the alternative output-based limits of 6.4E-06 lb/MMBtu of steam output or 7.3E-05lb/MWh output. This requirement shall be met at all times the boiler is operating except during periods of startup and shutdown during which time you must comply only with in **Conditions C.17 and C.18.**

The output-based emission limits, in units of pounds per million Btu of steam output, in Table 2 to 40 CFR 63 Subpart DDDDD are an alternative applicable only to boilers and process heaters that generate either steam, cogenerate steam with electricity, or both. The output-based emission limits, in units of pounds per megawatt-hour, in Table 2 to 40 CFR 63 Subpart DDDDD are an alternative applicable only to boilers that generate only electricity. Boilers that perform multiple functions (cogeneration and electricity generation) or supply steam to common headers would calculate a total steam energy output using Equation 21 of 40 CFR 63.7575 to demonstrate compliance with the output-based emission limits, in units of pounds per million Btu of steam output, in Table 2 to 40 CFR 63 Subpart DDDDD.

[Table 2, 1.b. of 40 CFR 63 Subpart DDDDD, 40 CFR 63.7500(a)(1), Rule 62-204.800(11)(b)104., F.A.C.]

6. **Condition 12**. It is requested that the optional emission limits under Subpart DDDDD be added to this condition:

HCl- 0.025 lb/MMBtu steam output or 0.27 lb/MWh

It should also be stated that "HCl emissions shall be determined in accordance with Condition C.52."

Department Response. Based on 40 CFR 63.7500(a)(1), the emission standards in the lb/MWh units are only for boilers that generate only electricity. The emission standards in the lb/MMBtu steam output units are only for boilers that generate either steam, cogenerate steam with electricity, or both. The lb/MMBtu steam output units are also applicable to boilers that perform multiple functions (cogeneration and electricity generation) or supply steam to common headers.

Based on the comment, Condition C.12. is revised as follows:

C.12. HCl Emissions: As determined by performance (stack) testing in accordance with **Condition C.52**, HCl emissions from the boiler shall not exceed 0.022 lb/MMBtu of heat input or the alternative output-based limits of 0.025 lb/MMBtu of steam output or 0.27 lb/MWh output. This requirement shall be met at all times the boiler is operating except during periods of startup and shutdown during which time you must comply only with items in **Conditions C.17. and C.18.**

The output-based emission limits, in units of pounds per million Btu of steam output, in Table 2 to 40 CFR 63 Subpart DDDDD are an alternative applicable only to boilers and process heaters that generate either steam, cogenerate steam with electricity, or both. The output-based emission limits, in units of pounds per megawatt-hour, in Table 2 to 40 CFR 63 Subpart DDDDD are an alternative applicable only to boilers that generate only electricity. Boilers that perform multiple functions (cogeneration and electricity generation) or supply steam to common headers would calculate a total steam energy output using Equation 21 of 40 CFR 63.7575 to demonstrate compliance with the output-based emission limits, in units of pounds per million Btu of steam output, in Table 2 to 40 CFR 63 Subpart DDDDD.

[Table 2, 1.a. of 40 CFR 63 Subpart DDDDD, 40 CFR 63.7500(a)(1), Rule 62-204.800(11)(b)104., F.A.C.]

7. **Condition 13.c.** In the first sentence, it is requested that the wording be revised to reflect that the opacity must be maintained at less than or equal to 10% or the highest hourly average opacity reading measured during the performance test run, whichever is higher. Suggested wording is provided below:

"As determined by COMS data, opacity must be maintained to less than or equal to the higher of:

(i) 10 percent opacity or

(ii) the highest hourly average opacity reading measured during the performance test run demonstrating compliance with the PM emission limitation as specified in Condition C.19.a.

The opacity is determined as a daily block average. The opacity monitoring data shall be reduced to 6-minute averages, and the 6-minute averages reduced to a daily block average. The opacity monitoring system data shall be collected according to 40 CFR 63.7525(c) and 63.7535."

Department Response. Based on the comment, Condition C.13.c. is rewritten as follows to include the opacity block average language in Table 8 of 40 CFR 63 Subpart DDDDD:

c. As determined by COMS data, opacity must be maintained to less than or equal to:

(i) 10 percent opacity or

(ii) the highest hourly average opacity reading measured during the performance test run demonstrating compliance with the PM emission limitation (daily block average) as specified in **Condition C.19.a.**

The opacity shall be determined as a daily block average. The opacity monitoring data shall be reduced to 6-minute averages, and the 6-minute averages reduced to a daily block average. The opacity monitoring system data shall be collected according to 40 CFR 63.7525(c) and 63.7535.

[Table 4, 4., and Table 8.,1. of 40 CFR 63 Subpart DDDDD, 40 CFR 63.7500(a)(2), 40 CFR 63.7540(a), Rule 62-204.800(11)(b)104., F.A.C.]

8. **Condition C.15.** The reference to Subsection G, should instead be to Conditions C.83 through C.85.

   Department Response. The Department agrees with the comment and the reference to Subsection G in Condition. C.15. has been corrected to reflect Conditions C.83. through C.85.

9. **Pg. 27 of 97: Subsection C- Emissions Unit 022. Condition C.16.** The reference to Condition C.58(10)(i) through (iv) in the second sentence should be to Condition C.58(10)(i) through (vi) and (12). Also, the reference to Condition C.58(10)(i) through (vi) in the last sentence should also refer to (12).

   Department Response. The Department agrees with the comment and Condition C.16 is corrected as follows:

   C.16. Tune-Up of Boiler – 5 year Basis. The applicable work practice standards of Table 3 to 40 CFR 63 Subpart DDDDD shall be met. A tune-up of the boiler shall be conducted on a 5-year basis as specified in **Condition C.58.(10)(i) through (~~iv~~vi) and (12)** to demonstrate continuous compliance. Each 5-year tune-up must be no more than 61 months after the previous tune-up. For units that are not operating at the time of their scheduled tune-up, a subsequent tune-up must be completed by following the procedures described in **Condition C.58.(10)(i) through (vi) and (12)** and the schedule described in **Condition C.58.(13)**.

   [40 CFR 63.7500(a), (a)(1), Table 3 Item 1., 40 CFR 63.7500(f), 40 CFR 63.7505(a), 40 CFR 63.7510(e), 40 CFR 63.7515(d), 40 CFR 63.7515(g)]

10. **Condition C.19.a.** It is requested that the same clarification be made to this condition as to Condition 13.c, described above.

    Department Response. The Department agrees with the comment and Condition C.19.a. is corrected as follows:

    C.19. Operating Limits. Each operating limit in Table 4 to 40 CFR 63 Subpart DDDDD that applies to the boiler shall be met. This requirement shall be met at all times the boiler is operating except during periods of startup and shutdown during which time you must comply only with **Conditions C.17 and C.18.**

    a. *Electrostatic Precipitator.* The daily block average opacity must be maintained to less than or equal to 10 percent opacity or the highest hourly average opacity reading measured during the performance test run demonstrating compliance with the PM emission limitation (daily block average). The opacity monitoring system data shall be collected according to 40 CFR 63.7525(c) and 63.7535 and reduced to 6-minute averages

11. **Pg. 28 of 97: Subsection C- Emissions Unit 022. Condition C.19.b.** This condition is labeled as "Performance Testing", however, we believe it more appropriate to label it as "Operating Load". Also, for clarification, the first sentence should be reworded as "The 30-day rolling average operating load **(steam rate)** of the boiler must be maintained….".

    Department Response. The Department agrees with the comment however, has used the term "steam generation" consistent with the Subpart language. Condition C.19.b. is corrected as follows:

    C.19. Operating Limits. Each operating limit in Table 4 to 40 CFR 63 Subpart DDDDD that applies to the boiler shall be met. This requirement shall be met at all times the boiler is operating except during periods of startup and shutdown during which time you must comply only with **Conditions C.17 and C.18.**

    b. ~~*Performance Testing*~~ *Operating Load.* The 30-day rolling average operating load (steam generation) of the boiler must be maintained such that it does not exceed 110 percent of the highest hourly average operating load recorded during the performance test. Operating load data

or steam generation data shall be collected every 15 minutes and the data reduced to 30-day rolling averages.

12. **Pg. 29 of 97: Subsection C- Emissions Unit 022. Excess Emissions.** The initial statement should include reference to a "NESHAP provision".

    Department Response. The Department agrees with the comment and the statement is revised as follows:

    Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of a NSPS or NESHAP provision.

13. **Pg. 30 of 97: Subsection C- Emissions Unit 022. Condition C.27.** This condition should also state that the opacity, CO and O2 monitors must also meet the requirements of 40 CFR 63 Subpart DDDDD.

    Department Response. The Department agrees with the comment and Condition C.27. is corrected as follows:

    C.27. COMS, CEMS, CMS – Opacity, SO_2, NO_x, CO, O_2: The Permittee shall install, calibrate, maintain, and operate continuous monitoring systems for measuring the opacity of emissions, sulfur dioxide emissions, nitrogen oxides emissions, carbon monoxide emissions and oxygen, in accordance with 40 CFR 60.13, 40 CFR 60.45, and 40 CFR 60, Appendices B and F.

    The opacity, CO and O_2 continuous monitoring systems shall also meet the applicable requirements of 40 CFR 63 Subpart DDDDD as specified in **Conditions C.53. and C.54.**

    [40 CFR 60.13; 40 CFR 60.45(a); 40 CFR 60, Appendices B and F; Construction Permit No. 0890004-018-AC; Construction Permit No.0890004-021-AC, 40 CFR 63.7525(a), 40 CFR 64.7525(c)]

14. **Pg. 31 of 97: Subsection C- Emissions Unit 022. Condition C.30.b.** Should the reference to Condition C.40 instead be to Condition C.46?

    Department Response. The Department agrees with the comment and Condition C.30.b. is corrected to reference Condition C.46.

15. **Condition C.31.b.** Should the reference to Condition C.44 instead be to Condition C.46?

    Department Response. The Department agrees with the comment and Condition C.31.b. is corrected to reference Condition C.46.

16. **Pg. 32 of 97: Subsection C- Emissions Unit 022. Condition C.32.b.** Should the reference to Condition C.45 instead be to Condition C.46?

    Department Response. The Department agrees with the comment and Condition C.32.b. is corrected to reference Condition C.46.

17. **Pg. 39 of 97: Subsection C- Emissions Unit 022. Condition C.46.** This condition refers to Condition C.33.(a), which is for CO; however, this Condition C.46 does not address CO.

    Department Response. The Department agrees with the comment and the reference to Condition C.33.(a) has been removed from Condition C.46.

18. **Pg. 41 of 97: Subsection C- Emissions Unit 022. Condition C.48.** The Common Conditions subsection is now Subsection D.

    Department Response. Based on Condition D.40. in the previous Title V Operation Permit, No. 0890004-042-AV, it doesn't appear that this permit condition is applicable to EU 022. As such, this permit condition has been removed from the permit.

19. **Condition 50**: last line – this should say "prior to" the inlet rather than "at the inlet" of the scrubber.

    Department Response. The Department agrees with the comment and Condition C.50. is corrected as requested.

20. **Pg. 42-44: Subsection C- Emissions Unit 022.Condition C.53** - intro paragraph says according to the procedures in paragraphs (1) - (6) of this condition, but they also include paragraph (7). We believe paragraph (7) is only applicable if you choose to use the performance test option rather than the CEMS option, so therefore should be removed.

    Department Response. Paragraph (7) has been removed from Condition C.53. as requested. The basis of the permit is condition is revised to 40 CFR 63.7525(a)(1)-(6).

21. **Pg. 48 of 97: Subsection C- Emissions Unit 022. Condition C.58(16) and (17).** This should state "N/A- facility **not** demonstrating compliance with an applicable TSM emissions limit."

    Department Response. The Department agrees with the comment and Condition C.58.(16) and (17) are corrected as requested.

22. **Pg. 50 of 97: Subsection C- Emissions Unit 022. Condition C.65.** This condition can be removed since it has been satisfied, i.e., the permittee reported actual annual emissions for a period of 5 years following the resumption of regular operation after this change.

    Department Response. The Department has removed the condition as requested.

23. **Pg. 53 of 97: Subsection C- Emissions Unit 022. Condition C.71(2).** This should state "N/A- facility **does** not comply with fuel analysis."

    Department Response. The Department agrees with the comment and Condition C.71.(2) is corrected as requested.

24. **Pg. 54 of 97: Subsection C- Emissions Unit 022. Condition C.71(5)(x).** This condition should state "N/A- facility does not comply using fuel analysis."

    Department Response. The Department agrees with the comment and Condition C.71.(5)(x) is corrected as requested.

25. **Condition C.71(5)(xvi).** This condition should state "N/A- facility does not comply using fuel analysis."

    Department Response. Based on the applicant's email correspondence of November 3, 2016, this request was in error. It is noted that Condition C.71.(5)(xvi) pertains to CO CEMS requirements and appears to be applicable. No change is made to the permit condition.

26. **Pg. 57 of 97: Subsection C- Emissions Unit 022. Condition C.78.** This condition should be clarified as "For Each CEMS, COMS, and continuous monitoring system **required by 40 CFR 63 Subpart DDDDD**, the following records must be kept".

    Department Response. The Department agrees with the comment Condition C.78. is revised as requested.

27. **Pg. 60 of 97: Subsection C- Emissions Unit 022.** Subpart DDDDD requirements- applicable fuel analysis requirements per section 63.7521 should be included in Subsection C since fuel analysis are required during performance testing to determine the F-Factor.

    Department Response. The Department agrees with the comment and has included a permit condition with the requirements of 40 CFR 63.7521 in the permit as requested.

28. **Pg. 83 of 97: Subsection F- Emissions Unit 024. Condition F.4 and F.5.** It is requested that **C**ondition F.4 and F.5 be removed from the permit as they pertain to the 30 day reporting of emergency generator relocation and removal. We believe that the Department has reasonable assurance of compliance through the submission of an annual operating report containing the information required in F3.

Department Response. Condition F.4. and Condition F.5. have been removed from the permit as requested. Condition F.3. is revised as follows:

F.3. The permittee shall record the following information:

a. Manufacturer name and date of manufacture of engine(s)

b. Model No. of each engine

c. Generating capacity in kW of each engine

d. No. of cylinders and displacement per cylinder (liters or cubic inches)

e. Quantity of fuel combusted and kWh generated will be recorded on a daily basis while the generator(s) are located at the site (total engines.)

f. Date and number of generators relocated to the site during each power supply disruption

g. Description of each power supply disruption event, including duration of the event and status of the affected existing emission unit(s)

h. Estimate and record the quantity of the following pollutants (total from all engines) generated on a daily basis while located the generator(s) are located at the site:

(1) Carbon Monoxide

(2) Oxides of Nitrogen

(3) Sulfur dioxide

(4) Volatile Organic Compounds

(5) Particulate Matter (PM), PM10, and PM2.5

i. Date each generator is removed from the site during each power supply disruption

j. Maintain fuel record receipts and supplier certifications for the fuel combusted in the temporary emergency generators. Receipts and certifications shall include the supplier name, type of fuel supplied and sulfur content of fuel supplied.

Provide calculations for each pollutant estimate including supporting documentation for any emission factors used.

These records shall also be included in the annual operating report that shall be submitted on or before April 1st of the year following the calendar year in which the data was recorded.

[Rule 62-212.300, F.A.C., Permit No. 0890004-035-AC, Permit No. 0890004-038-AC]

29. **Pg. 84 of 97: Subsection G- Emissions Unit 025. Condition G.3.** This condition should be deleted as the compliance date has already passed.

Department Response. The Department agrees with the comment and has deleted the condition as requested.

30. **Pg. 86 of 97: Subsection G- Emissions Unit 025. Condition G.6.a, b, c.** It is requested that "annually" be clarified to state "once per calendar year".

Department Response. EPA clarified in the question and answer (Q&A) document, "Implementation Question and Answer Document for National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and New Source Performance Standards for Stationary Compression Ignition and Spark Ignition Internal Combustion Engines dated April 2, 2013, that "year" under 40 CFR 63 Subpart ZZZZ is interpreted to mean "calendar year". Therefore, the language in Condition G.6.a.,b., and c. is corrected as follows:

G.6. The engine shall comply with the following standards:

a. Change oil and filter every 500 hours of operation or annually[1], whichever comes first[2];
b. Inspect air cleaner every 1,000 hours of operation or annually[1], whichever comes first; and
c. Inspect all hoses and belts every 500 hours of operation or annually[1], whichever comes first, and replace as necessary.[3]

[1] Annually is interpreted to mean per calendar year

[2] Sources have the option to utilize an oil analysis program as described in **Condition G.6**. in order to extend the specified oil change requirement.

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

[40 CFR 63.6602, Item 1 of Table 2c, Table 2c Footnotes 2 and 3]

31. **Pg. 87 of 97: Subsection G- Emissions Unit 025. Condition G.14(a)(3).** This condition should be labeled as "N/A", since no performance tests or performance evaluations are required for the Existing RICE.

    Department Response. Condition G.14.(a)(3) is corrected as requested

32. **Condition G.14(b).** This condition should be labeled as "N/A", since no CEMS or CPMS are required for the Existing RICE.

    Department Response. Condition G.14.(b) has been removed from the permit as a result of the comment.

33. **Pg. 90 of 97: Subsection H- Emissions Unit 026. Table**. Update table with "Year Installed" for both engines as 2016.

    Department Response. 2016 has been added to the Table for the year installed for both engines as requested.

34. **Page 95 of 97: Subsection H- Emissions Unit 026. Condition H.13.b.** Rewrite to state, "The annual report must cover the calendar year 2016 and must be submitted no later than March 31, 2017."

    Department Response. Since the dates of 2015 and March 31, 2016 in the rule language have passed. The first sentence has been removed from the permit condition.

35. **Pg. 96 of 97: Referenced Attachments.** The two attachments related to the Molten Handling System can be removed since there are no longer any applicable requirements for the system.

    Department Response. The two attachments have been removed as requested.

36. **Appendix CAM**- please clarify that the ESP power is a backup indicator that only needs to be monitored when opacity is not available.

    Department Response. "When Opacity is not available" has been added to the "Back-up Indicator" heading in the table.

MINOR PERMIT CORRECTION

Minor Correction to Condition C.66.- Actual Emissions Reporting Permit No. 0890004-040-AC.

The Table of the PSD Analysis from Construction Permit No. 0890004-040-AC (Table A.) has been removed from paragraph d. A permitting note with the baseline emissions from this project has been put in its place instead.

{Permitting Note: Baseline emissions were determined to be (in TPY) PM: 30.1; PM10: 51.1; PM2.5: 48.3; VOC: 1.35; SO2: 31.06; CO: 234.2; NOx: 304.2; Pb: 2.5E-02; Hg: 1.47E-03; SAM: 1.37; Fluorides: 0.010; GHG: 20,709; CO2e: 27,896.}

III. CONCLUSION

The permitting authority will issue the proposed Title V Air Operation Permit No. 0890004-048-AV, with the changes noted above to be reviewed by the USEPA.