UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

March 19, 2021

Mr. Thomas Kicklighter
VP - General Manager
Foley Cellulose LLC
One Buckeye Drive
Perry, Florida 32348-7702

Dear Mr. Kicklighter:

This is in response to your letter dated February 5, 2021, which is a follow-up communication regarding the U.S. Environmental Protection Agency's (EPA) April 14, 2020, approval of alternative monitoring procedures (AMPs) for the No.1 Bark Boiler at the Foley Cellulose LLC (Foley) Kraft pulp mill in Perry, Florida. The No. 1 Bark Boiler is subject to Title 40, Code of Federal Regulations (CFR), Part 60, Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (Subpart Db). The AMP approved by the EPA in April 2020 allows Foley to satisfy Subpart Db monitoring requirements using procedures adopted from 40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (Subpart DDDDD). The basis for the approval of the AMP was that the presence of water droplets in the flue gas downstream of the venturi scrubber that controls particulate matter emissions from the No. 1 Bark Boiler interferes with the ability of a continuous opacity monitoring system to obtain accurate results.

The AMP that the EPA approved in April 2020, was for an operating scenario (Scenario 1) under which the No. 1 Bark Boiler burns wood or a combination of either: (1) wood and natural gas; (2) wood and No. 6 fuel oil; or 3) wood, natural gas, and No. 6 fuel oil. Your February 5, 2021, letter requested clarification regarding compliance demonstration options for the No. 1 and No. 2 Bark Boilers under an additional operating scenario (Scenario 2) when only natural gas is combusted in the units. On February 10, 2021, we requested additional information regarding the No. 1 Bark boiler, and you provided the information on February 16, 2021. This response, based on your additional and specific requests, complements the EPA's April 14, 2020, AMP approval letter. Details regarding the requests contained in your February 5, 2021, letter and our responses are provided in the remainder of this letter.

Request 1 – Subpart Db monitoring for Bark Boiler No. 1 under operating Scenario 2

You request to revise the AMP approved on April 14, 2020, to (1) not require operation of the No. 1 Bark Boiler's venturi scrubber when firing only natural gas and (2) exclude periods when the wet scrubber is not operated during natural gas burning from the calculation of 30-day compliance averages. Under provisions of §60.42b(k)(2), and for affected facilities that commences construction, reconstruction, or modification after February 28, 2005, units firing only a gaseous fuel (*e.g.,* natural gas) with a potential SO_2 emission rate of 0.32 lb/MMBtu heat input or less are exempt from SO_2 emissions limits specified in §60.42b.

Based on specifications included in the natural gas tariff you provided, the minimum BTU content of the natural gas you purchase is specified as 1,000 BTU/SCF while the maximum total sulfur content is 10 grains per 100 standard cubic foot. Under these circumstances, the maximum emissions rate of SO_2 resulting from the combustion of natural gas is 1.40E-02 lb/MMBTU, which is significantly less than the applicability threshold in §60.42b(k)(2). §60.43b does not specify standards for particulate matter (PM) or opacity for units combusting natural gas. Due to non-specification of applicable emission standards for these pollutants under Subpart Db when only natural gas is burned in the No. 1 Bark Boiler, the operational and monitoring changes you propose for periods when only natural gas is combusted are acceptable to the EPA.

Request 2 – Subpart DDDDD operating and monitoring requirements for Bark Boilers No. 1 and 2 under operating Scenario 2

You request approval of specific operating and monitoring alternatives to requirements under Subpart DDDDD for both bark boilers. Specifically, you request that the No. 1 and 2 Bark Boilers be allowed to operate without engaging their associated wet scrubbers during periods when only natural gas is fired. For periods when only natural gas is fired, you request to exclude these periods when calculating 30-day rolling averages for the scrubber operating limits specified in Table 4 of Subpart DDDDD. The basis cited for these requests is that the expectation that pollutant emission rates will be low when natural gas is the fuel burned in the boilers. In addition, you cite similar requests that the EPA has approved for Verso Corporation (Verso) Mill in Jay, Maine, and the Packaging Corporation of America (PCA) Mill in Clyattville, Georgia. Copies of these previous determinations are available on the EPA's Applicability Determination Index (Determination Nos. M150040 and M190006, respectively).

Provided that Foley can demonstrate, through existing data or emissions testing, that the No. 1 and 2 Bark Boilers will comply with the PM, mercury, and hydrogen chloride emissions standards in Subpart DDDDD without engaging the wet scrubber when firing only natural gas, the EPA approves the request to operate the No. 1 and 2 Bark Boiler without engaging the unit's wet scrubbers and to track fuel usage (natural gas) in place of operating parameters for the wet scrubber. This data must be kept on site, along with a copy of this letter, and made available for review by the EPA, or the state, upon request while the AMP is in effect.

The EPA's approval of your request to operate No. 1 and 2 Bark Boilers without engaging the venturi scrubbers during natural gas firing is contingent upon a demonstration that compliance with the PM, mercury, and hydrogen chloride emissions standards in Subpart DDDDD may be achieved without the scrubbers is consistent with the EPA's approvals for Verso and PCA. These previous approvals were coordinated with the EPA's Office of Enforcement and Compliance Assurance and Office of Air Quality Planning and Standards.

If Foley demonstrates that the No. 1 and 2 Bark Boilers can comply with applicable PM, mercury, and hydrogen chloride emissions standards without engaging the wet scrubber when firing only natural gas, your proposal to exclude scrubber pressure drop and liquid flow rate monitoring data when calculating 30-day rolling averages for the operating parameters specified in Table 4 is also acceptable.

Request 3 – Procedures for reestablishing operating limits under the previous AMP approved for the No. 1 Bark Boiler

You requested clarification regarding language contained in our April 14, 2020, letter which approved the AMP involving the 40 CFR Part 60, Subpart Db monitoring requirements for the No. 1 Bark Boiler. Our previous letter specified that operating limits for scrubber pressure drop and liquid flow rate should be based upon the lowest one-hour average values during the most recent performance test demonstrating compliance with the PM emission limitation in 40 CFR 60.43b(h). Your February 5, 2021, letter asked for clarification of our previous AMP with respect to operating limits. Scrubber operating limits shall be set in accordance with 40 CFR 63.7540(a)(1), which states that operating limits may be confirmed or reestablished during performance tests and we have determined that using the Subpart DDDDD provisions for confirming or reestablishing operating limits under the previously approved AMP for the No. 1 Bark Boiler are appropriate.

Please note that the approvals granted in this letter do not alter Foley's obligations to meet all other applicable New Source Performance Standards and National Emissions Standards for Hazardous Air Pollutants requirements, including, but not limited to requirements promulgated in 40 CFR 60.11, 60.12, 63.4 and 63.6.

If there any questions concerning this response, please contact Tracy Watson of my staff at (404) 562-8998 or watson.marion@epa.gov.

Sincerely,

KENNETH MITCHELL Digitally signed by KENNETH MITCHELL Date: 2021.03.19 14:29:23 -04'00'

For Caroline Y. Freeman
Director
Air and Radiation Division

cc: David Read, FDEP