# TECHNICAL EVALUATION
# &
# PRELIMINARY DETERMINATION

## APPLICANT

Rayonier Performance Fibers, LLC
PO Box 2002
Fernandina Beach, FL 32035

Fernandina Beach Sulfite Pulp Mill
ARMS Facility ID No. 0890004
Foot of Gum Street
Fernandina Beach, Florida

## PROJECT

Project No. 0890004-027-AC
Application for Air Construction Permit
Repair and Maintenance Project

## COUNTY

Nassau, Florida

## PERMITTING AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
Air Resources Section
7625 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

December 23, 2009

## 1. GENERAL PROJECT INFORMATION

### Air Pollution Regulations

Projects with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial activities. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

### Facility Description and Location

The applicant operates an existing Dissolving Sulfite Pulp Mill (SIC No. 2611) in Fernandina Beach at the Foot of Gum Street in Nassau County, Florida 32305. The UTM coordinates are zone 14, 454.7 km East, and 3392.2 km North. This site is an area that is in attainment (or designated as unclassifiable) for all pollutants subject to a National Ambient Air Quality Standard (NAAQA).

The mill uses a sulfite (ammonia-base) process to produce various grades of chemical cellulose from pine wood-chips. There are only two other pulp mills located in the United States that produce products similar to the Fernandina Mill and neither of these mills use the same type of manufacturing process. This plant produces approximately 10 different grades of cellulose each with different specifications and customers. The amount of each grade of product that is produced is based on market demand. The cellulose produced at this mill goes into such products as plastics, photographic film, LCD screens, paints, cigarette filters, pharmaceuticals, food products, cosmetics and textiles. Customers of these products have stringent quality requirements. This mill produces approximately 150,000 tons of performance fibers annually.

### Existing Process Description

The sulfite process utilizes a sulfurous acid and ammonium bisulfite cooking solution to chemically separate the lignin from the cellulose. Pine wood chips and cooking solution are cooked in the six (6) batch digesters. The cooking process requires approximately 6 hours to complete. The unbleached sulfite pulp and spent cooking solution (SSL- spent sulfite liquor) are separated over vacuum washers (red stock washers). The unbleached pulp is then sent into the screening area to remove any knots and tailings (uncooked, woody materials), while the SSL is pumped to the evaporators to concentrate the solids content before being burned in the recovery boiler. The collected knots and tailings are pressed for use as fuel in the No. 6 power boiler (Emission Unit No. 022).

The sulfurous acid and ammonium bisulfite cooking solution is prepared in the "acid plant".

The unbleached pulp exiting the screening operation enters the bleach plant. The first stage in the bleaching plant is the Hot Caustic Extraction (HCE) stage. Caustic soda is used to remove hemi-cellulose (small chain cellulose molecules) from the pulp in small pressure vessels called HCE cells. The mill currently operates eight (8) such cells. The pulp is washed after this HCE stage. The spent solution, Hot Caustic Extract, is concentrated in a set of evaporators before being sold to Kraft mills for its sodium content and energy value.

Pulp leaving the HCE stage is further purified in continuous and batch stages using peroxide, chlorine dioxide, chlorine, sodium hydroxide, and sodium hypochlorite depending upon the pulp grade specifications. Following these bleaching stages, the pulp passes through centrifugal dirt cleaners before being sent to the pulp machine. The pulp machine forms the sheet by draining water from the pulp slurry (containing 99% water) over a moving wire to a consistency of 50% water. The remainder of the water is removed by passing the pulp sheet over pressing and drying cylinders heated internally with steam. The dry pulp sheet, which contains approximately 7% moisture, is then wound onto a "jumbo" roll before being transported to the finishing room where the pulp sheet is cut into smaller rolls or sheets based on customer specifications. No coatings are used on any of the pulp grades produced by the mill.

The digestion, the HCE stage, and the pulp machine are high users of steam for heating. The steam is produced in the power boiler. Steam is also used to produce about 90 percent of the mill's electricity needs.

The Sulfite Recovery Boiler (SRB) provides steam for the evaporators. It's emissions are scrubbed for sulfur dioxide recovery using an ammonia solution. The ammonium bisulfite produced in the scrubber is used for cooking acid make-up.

**Facility Regulatory Categories**

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

**Project Description**

The existing SRB (Emission Unit No. 006) is rated at a nominal heat input rate of 653.1 MM Btu per hour firing a maximum of 35 tons per hour of red liquor solids (RLS) (dry basis), based on a nominal heating value of 9330 Btu per pound of RLS. Rayonier Performance Fibers, LLC proposes extensive maintenance (refurbishment) on the SRB to consist of the repair and replacement of numerous equipment including the steam drum, mud drum, air heater components, generating bank steam tubes, and minor modifications to the side wall, outlet duct, rear wall, screen supply and roof steam tubes. Boiler refractory will also be replaced as necessary to accommodate these repairs.

The project is not intended to regain lost capacity and will not result in any increase in the boiler heat input, fuel consumption, steam generation capacity, pulp production or pollutant emissions. There are no known defects or deficiencies restricting operation and the unit can currently sustain the permitted

heat input rate. Records indicate that the SRB is currently capable of operating at the permitted capacity. Pursuant to Rule 62-212.400, F.A.C., Rayonier Performance Fibers, LLC provided information to show that the project will not exceed the significant emissions rates that require preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality. In accordance with Rule 62-212.300, F.A.C., the draft permit requires Rayonier Performance Fibers, LLC to provide reports summarizing the actual emissions for each year during the 5-year period following completion of the project. This is to ensure that the project remains minor with respect to PSD preconstruction review. The proposed project will be coincident with the scheduled outage for the SRB starting in the late winter 2010/early spring of 2010 and is expected to be completed no later than June 30, 2010.

**Proposed Work**

Sulfite Recovery Boiler: The permittee is authorized to conduct refurbishment and maintenance on the SRB including the repair and replacement of the following equipment:

- Steam drum and associated components;
- Mud drum and associated components;
- Up to 100% of air heater components;
- Up to 100% of generating bank steam tubes
- Minor modifications to the side wall, outlet duct, rear wall, screen supply and roof steam tubes
- Existing air heater rake style soot-blowers will be replaced with rotary soot-blowers to accommodate the new horizontal air heater configuration

Boiler refractory will also be replaced as necessary to accommodate these repairs

The projected operation of the SRB over a 5-year period following completion of the refurbishment project, projects up to a 9.6% increase of red liquor solids combustion above the lowest level during the past ten years, which is based on the information presented in the application and related documents.

For the proposed project, the application documents the baseline emissions from the SRB, the projected actual emissions from the SRB and emissions that could have been accommodated during the baseline period prior to the repair and maintenance project. Therefore, the applicant maintains that the emissions increases due to the demand growth may be excluded, which results in no emissions increases such that the project does not trigger PSD preconstruction review.

**Processing Schedule**

| | |
|---|---|
| 10/15/2009 | Department received the application for a minor source air pollution construction permit. |
| 11/12/2009 | Department requested additional information. |
| 11/23/2009 | Department received additional information; application complete. |

## 2. PSD APPLICABILITY

### General PSD Applicability

The Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. A PSD applicability review is required in areas currently in attainment with the state and federal AAQS or areas otherwise

designated as "unclassifiable". A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit: 5 tons per year or more of lead; 250 tons per year or more of any regulated air pollutant; or 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD-major facility categories (fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants, and charcoal production plants.). Projects at existing or new major stationary sources are subject to PSD preconstruction review. In addition, proposed projects at existing minor sources are subject to PSD preconstruction review if potential emissions *from the proposed project* will exceed the PSD major stationary source thresholds.

Once a project becomes subject to PSD preconstruction review, each PSD pollutant is reviewed for PSD applicability based on emissions thresholds known as the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides ($NO_X$); sulfur dioxide ($SO_2$); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less ($PM_{10}$); volatile organic compounds (VOC); lead (Pb); Fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide ($H_2S$); total reduced sulfur (TRS), including $H_2S$; reduced sulfur compounds, including $H_2S$; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as $SO_2$ and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as nonmethane organic compounds (NMOC); and mercury (Hg). Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

**PSD Applicability for Project**

The following table summarizes the applicant's expected changes in actual emissions from the SRB refurbishment project based on the application and the applicant's additional information received November 23, 2009.

Table A. Applicant's Annual Emissions Summary and PSD Applicability

| Pollutant | Actual Annual Emissions, Tons/Year | | | | | | Subject to PSD? |
|---|---|---|---|---|---|---|---|
| | Baseline Actual Emissions[a] | Projected Actual Emissions[a] | Projected Increases [b] | Excludable for Demand Growth [c] | Project Increase [d] | PSD Significant Emissions Rate | |
| $SO_2$ | 970.87 | 836.75 | 0 | 435.89 | 0 | 40 | No |
| $NO_X$ | 1,977.46 | 2,013.6 | 36.14 | 186 | 0 | 40 | No |

| Pollutant | Actual Annual Emissions, Tons/Year | | | | | | Subject to PSD? |
|---|---|---|---|---|---|---|---|
| | Baseline Actual Emissions[a] | Projected Actual Emissions[a] | Projected Increases [b] | Excludable for Demand Growth [c] | Project Increase [d] | PSD Significant Emissions Rate | |
| CO | 679.97 | 772.24 | 92.27 | 465.4 | 0 | 100 | No |
| PM | 109.99 | 114.26 | 4.27 | 10.6 | 0 | 25 | No |
| $PM_{10}$ [g] | 99.93 | 103.85 | 3.92 | 9.4 | 0 | 15 | No |
| VOC | 8.45 | 8.81 | 0.36 | 0.7 | 0 | 40 | No |
| SAM | 42.66 | 37.21 | 0 | 19.4 | 0 | 7 | No |
| Pb | 1.37E-02 | 1.35E-02 | 0 | 1.40E-03 | 0 | 0.6 | No |
| Hg | 7.38E-04 | 6.95E-04 | 0 | 1.06E-04 | 0 | 0.1 | No |
| F | 0.066 | 0.034 | 0 | 3.62E-02 | 0 | 3 | No |

Notes: Emissions calculations provided by the applicant in the application received October 15, 2009 and additional information received November 23, 2009.

a. Calculated pollutant emissions are based on the following: $SO_2$ - CEMS (See Table 4-1 and 4-2 in application); NOx - Stack testing and AP-42 Table 1.3-1(See Table 4-1 and 4-2 in application) ; CO -Continuous process monitor data and AP-42 Table 1.3-1 (See Table 4-1 and 4-2 in application); PM - Stack testing and AP-42 Table 1.3-1 (See Table 4-1 and 4-2 in application); $PM_{10}$ - Stack testing for PM and NCASI Technical Bulletin No. 884 (See Table 4-1 and 4-2 in application); VOC - Stack testing, NCASI Technical Bulletin No. 858, and AP-42 Table 1.3-3; SAM - (See Table 4-1 and 4-2 in application); Pb - NCASI Technical Bulletin No. 858 and AP-42 Table 1.3-11(See Table 4-1 and 4-2 in application); F - AP-42 Table 1.3-11 (See Table 4-1 and 4-2 in application); Hg - NCASI Technical Bulletin No. 858 and AP-42 Table 1.3-11(See Table 4-1 and 4-2 in application)

b. The projected emissions increase is the difference between projected actual emissions and baseline actual emissions.

c. When determining projected actual emissions, Rule 62-210.200(250), F.A.C. states that the Department … "… Shall exclude that portion of the unit's emissions following the project that an existing unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions and that are also unrelated to the particular project including any increased utilization due to product demand growth." Since the SRB is currently capable of operating at maximum permitted capacity given sufficient demand, all of the actual emissions resulting from the increased utilization of SRB due to product demand growth shall be excluded from projected actual emissions. For this case, the applicant excluded all of the emissions resulting from the predicted demand growth (including emissions that the existing emissions unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions) for the highest year in the projected 5-year period after completing the project.

d. The project increase is the projected actual emissions minus the baseline actual emissions minus the excludable actual emissions due to demand growth.

## 3. FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION (FDEP) REVIEW

### Brief Discussion of Emissions and PSD Applicability

The Department concurs with the applicant's conclusion and summary of the project, except for the projected actual emission rates for the following pollutants: Sulfur dioxide, sulfuric acid mist, and carbon monoxide.

Sulfur dioxide ($SO_2$) -- The applicant used a lower emission factor[EF] (6.54 lbs/ton RLS) and a higher EF (15.36 lbs/$10^3$ gal oil) in the projected actual emissions calculation rather than the average rate calculated from the baseline actual emissions (8.12 lbs/ton RLS and 6.4 lbs/$10^3$ gal oil ). The Department believes that using the EFs determined from the average rates provides a more consistent approach to calculating projected actual emissions.

Sulfuric Acid Mist (SAM) -- Since the SAM projected actual emissions are based upon the $SO_2$ projected actual emissions the Department believes that the SAM projected actual emissions should be recalculated.

Carbon Monoxide (CO) -- The applicant used a higher emission factor (6.10 lbs/ton RLS) in the projected actual emissions calculation rather than the average rate calculated from the baseline actual emissions (5.57 lbs/ton RLS). The Department believes that using the EFs determined from the average rates provides a more consistent approach to calculating projected actual emissions.

Except for the above noted pollutants and PM/$PM_{10}$ the applicant used the average baseline EF rates to calculate the projected actual emissions. It is noted that for PM/$PM_{10}$ a higher EF than the baseline average was used for the projected actual emissions. The Department concluded that this was a reasonable conclusion considering the variablity in available sulfur content (related to PM/$PM_{10}$ emissions) of No. 6 fuel oils.

Based upon the above, the following table summarizes the **Department's** conclusion of the expected changes in actual emissions from the SRB refurbishment project based on the application, related documents and the applicant's additional information received November 23, 2009. Please note that the Department's changes are noted in **bold** in Table B:

Table B. FDEP's Annual Emissions Summary and PSD Applicability

| Pollutant | FDEP Actual Annual Emissions, Tons/Year | | | | | | Subject to PSD? |
|---|---|---|---|---|---|---|---|
| | Baseline Actual Emissions[a] | Projected Actual Emissions[a] | Projected Increases [b] | Excludable for Demand Growth [c] | Project Increase [d] | PSD Significant Emissions Rate | |
| $SO_2$ | 970.87 | **1027.26** | **56.39** | 435.89 | 0 | 40 | No |
| $NO_X$ | 1,977.46 | 2,013.6 | 36.14 | 186 | 0 | 40 | No |
| CO | 679.97 | **706.32** | **26.35** | 465.4 | 0 | 100 | No |
| PM | 109.99 | 114.26 | 4.27 | 10.6 | 0 | 25 | No |
| $PM_{10}$ [g] | 99.93 | 103.85 | 3.92 | 9.4 | 0 | 15 | No |
| VOC | 8.45 | 8.81 | 0.36 | 0.7 | 0 | 40 | No |
| SAM | 42.66 | **45.46** | **2.8** | 19.4 | 0 | 7 | No |
| Pb | 1.37E-02 | 1.35E-02 | 0 | 1.40E-03 | 0 | 0.6 | No |
| Hg | 7.38E-04 | 6.95E-04 | 0 | 1.06E-04 | 0 | 0.1 | No |

| Pollutant | FDEP Actual Annual Emissions, Tons/Year | | | | | | Subject to PSD? |
|---|---|---|---|---|---|---|---|
| | Baseline Actual Emissions[a] | Projected Actual Emissions[a] | Projected Increases [b] | Excludable for Demand Growth [c] | Project Increase [d] | PSD Significant Emissions Rate | |
| F | 0.066 | 0.034 | 0 | 3.62E-02 | 0 | 3 | No |

a. Calculated pollutant emissions are based on the following: $SO_2$ - CEMS (See Table 4-1 and 4-2 in application); NOx - Stack testing and AP-42 Table 1.3-1(See Table 4-1 and 4-2 in application) ; CO -Continuous process monitor data and AP-42 Table 1.3-1 (See Table 4-1 and 4-2 in application); PM - Stack testing and AP-42 Table 1.3-1 (See Table 4-1 and 4-2 in application); $PM_{10}$ - Stack testing for PM and NCASI Technical Bulletin No. 884 (See Table 4-1 and 4-2 in application); VOC - Stack testing, NCASI Technical Bulletin No. 858, and AP-42 Table 1.3-3; SAM - (See Table 4-1 and 4-2 in application); Pb - NCASI Technical Bulletin No. 858 and AP-42 Table 1.3-11(See Table 4-1 and 4-2 in application); F - AP-42 Table 1.3-11 (See Table 4-1 and 4-2 in application); Hg - NCASI Technical Bulletin No. 858 and AP-42 Table 1.3-11(See Table 4-1 and 4-2 in application)

b. The projected emissions increase is the difference between projected actual emissions and baseline actual emissions.

c. When determining projected actual emissions, Rule 62-210.200(250), F.A.C. states that the Department … "… Shall exclude that portion of the unit's emissions following the project that an existing unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions and that are also unrelated to the particular project including any increased utilization due to product demand growth." Since the SRB is currently capable of operating at maximum permitted capacity given sufficient demand, all of the actual emissions resulting from the increased utilization of SRB due to product demand growth shall be excluded from projected actual emissions. For this case, the FDEP excluded all of the emissions resulting from the predicted demand growth (including emissions that the existing emissions unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions) for the highest year in the projected 5-year period after completing the project.

d. The project increase is the projected actual emissions minus the baseline actual emissions minus the excludable actual emissions due to demand growth.

The SRB is scheduled for an outage to conduct annual maintenance beginning in the late winter 2010 /early spring of 2010. During 2009 the mud drum experienced cracking and the boiler had to be removed from service for repairs. Cracking is an indication that the mud drum needs to be replaced in the near future. When replacing the mud drum it is also beneficial to replace the steam drum, air heater, and other miscellaneous components for reliability purposes. Rayonier Performance Fibers, LLC has decided to replace these components during the late winter 2010/early spring of 2010 annual shutdown to insure the continued reliability of the SRB.

Rule 62-210.200(250), F.A.C. includes the following criteria in the definition of *projected actual emissions*, "In determining the projected actual emissions, the Department … shall exclude that portion of the unit's emissions following the project that an existing unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions and that are also unrelated to the particular project including any increased utilization due to product demand growth." To show that SRB could have accommodated the increased operation due to demand growth, the applicant provided a projection of the operation of the SRB using the maximum monthly RLS firing rate obtained from the period of 2006 through 2009 and then projected it to an annual basis. The maximum monthly rate during the period was 48,610,000 pounds of RLS fired. Annualized, this results in an annual rate of

280, 688 tons per year of RLS fired. The information in the application and related documents supports the conclusion that the existing unit was capable of operating at the higher calculated rate.

The applicant contends that the proposed refurbishment and replacement of this equipment is not intended to regain lost capacity. The project will not result in any increase in the boiler heat input, fuel consumption, steam generation or emissions. The applicant maintains that the unit has no known defects or deficiencies restricting operation and the unit can currently sustain the permitted heat input rate. Records indicate that SRB is currently capable of operating at permitted capacity. Based on the projections, supporting information provided by the applicant, conclusions presented by the applicant, and the emissions summary presented in Table B the Department agrees that the project does not trigger PSD preconstruction review.

Therefore, the project requires a minor air construction permit to authorize the component repairs, replacements, and refurbishment for the SRB. Pursuant to Rule 62-212.300(1)(e), F.A.C., the applicant shall provide reports in summarizing actual emissions ($SO_2$, $NO_X$, CO, PM, $PM_{10}$, VOC, SAM, Pb, F, and Hg) computed in accordance with the requirements of Rule 62-210.370, F.A.C. for each year during the 5-year period following completion of the project.

**NSPS Applicability**

A project for an existing unit may trigger the federal New Source Performance Standards (NSPS) in two ways.

1. The project is considered a modification when the project results in an increase in the hourly mass emissions rate of an NSPS-regulated pollutant. Since this project will not change the performance or increase the capacity (heat input rate, fuel consumption rate or steam generation rate) of the SRB, the hourly mass emissions rates will not increase.
2. Pursuant to 40 CFR 60.15, a project is considered reconstruction when the fixed capital costs of the replacement components exceed 50% of the fixed capital costs for a comparable new replacement unit. The applicant estimates a cost of $12,000,000 for the proposed component replacement and maintenance items on the SRB. The applicant predicts that the fixed replacement cost for a comparable new SRB is in excess of $100,000,000. Therefore, the total project costs will be less than 50% of the cost of a comparable replacement unit and the project is not considered reconstruction for purposes of the NSPS.

## 4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jerry Woosley is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection, Northeast District Office, 7525 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7590, Phone: 904/807-3300.