Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

August 16, 2011

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

Re: Title V Air Operation Permit Renewal
Fernandina Beach Mill
Proposed Permit Project No.: 0890004-029-AV

Dear Mr. McDonald:

One copy of the "**PROPOSED DETERMINATION**" for the Title V Air Operation Permit Renewal for the Fernandina Beach Mill located at the Foot of Gum Street, Fernandina Beach, Nassau County, Florida, 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 Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

"http://www.dep.state.fl.us/air/emission/apds/default.asp"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED 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Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.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 Jerry Woosley at 904-256-1563.

Sincerely,

Christopher L. Kirts, P.E.
District Air Program Administrator

CLK:jw

Enclosures

Copy furnished to:

Mr. David A. Buff, P.E.: dbuff@golder.com
Ms. Barbara Friday, DEP BAR: Barbara.Friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
Mr. David Rogers, Rayonier Performance Fibers, LLC (david.rogers@rayonier.com)
Mr. C.A. McDonald, Rayonier Performance Fibers, LLC (ca.mcdonald@rayonier.com)
Ms. Debra Lane, Rayonier Performance Fibers, LLC (debra.lane@rayonier.com)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Monique Jordan

8/16/2011

(Clerk) (Date)

PROPOSED Determination

Title V Air Operation Permit Renewal
Rayonier Performance Fibers, LLC
Proposed Permit Project No.: 0890004-029-AV

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" to Rayonier Performance Fibers, LLC for the Fernandina Beach Mill located at the Foot of Gum Street, Fernandina Beach, Nassau County, Florida was clerked on May 26, 2011. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was published in the **Fernandina Beach News Leader** newspaper on July 13, 2011. The REVISED DRAFT Permit was available for public inspection at the Florida Department of Environmental Protection Northeast District Office (permitting authority) in Jacksonville, Florida. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was received on July 18, 2011.

II. Public Comment(s).

Comments were received and the REVISED DRAFT Permit was not changed. The comments were not considered significant enough to reissue the REVISED DRAFT Permit and require another Public Notice. Comments were received from one respondent(s) during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.

A. E-mail from Mr. David Buff, P.E., Rayonier Performance Fibers, LLC consultant, received on June 17, 2011.

1. Response: As a result of this comment, **Specific Condition No. G.26.** is hereby changed:

From: Mercury Emissions- Stack Testing: The Permittee shall either conduct testing in accordance with the terms of this Specific Condition or Specific Condition G.27. or as an alternative conduct sludge sampling in accordance with Specific Condition G.28.

(a) Method 101A of 40 CFR 61 Appendix B shall be the test method.

(b) The Permittee shall notify the Compliance Authority in writing at least 30 days prior to an emission test, so that he may at his option observe the test.

(c) Samples shall be taken over such a period or periods as are necessary to determine accurately the maximum emissions which will occur in a 24-hour

period. No changes shall be made in the operation which would potentially increase emissions above the level determined by the most recent stack test, until the new emission level has been estimated by calculation and the results reported to the Department.

(d) All samples shall be analyzed and mercury emissions shall be determined within 30 days after the stack test. Each determination shall be reported to the Compliance Authority by a registered letter dispatched within 15 calendar days following the date such determination is completed.

(e) Records of emission test results and other data needed to determine total emissions shall be retained at the source and shall be made available, for inspection by the Compliance Authority, for a minimum of 2 years.

[40 CFR 61.53(d)]

To: Mercury Emissions: Stack testing for emissions of mercury shall be conducted in accordance with the terms of this Specific Condition (G.26.), or Specific Condition G.27. As an alternative to stack testing, testing for mercury emissions by sludge sampling may be conducted in accordance with the terms of Specific Condition G.28.

Method 101A of 40 CFR 61 Appendix B shall be the test method.

(a) The Permittee shall notify the Compliance Authority in writing at least 30 days prior to an emission test, so that he may at his option observe the test.

(b) Samples shall be taken over such a period or periods as are necessary to determine accurately the maximum emissions which will occur in a 24-hour period. No changes shall be made in the operation which would potentially increase emissions above the level determined by the most recent stack test, until the new emission level has been estimated by calculation and the results reported to the Department.

(c) All samples shall be analyzed and mercury emissions shall be determined within 30 days after the stack test. Each determination shall be reported to the Compliance Authority by a registered letter dispatched within 15 calendar days following the date such determination is completed.

(d) Records of emission test results and other data needed to determine total emissions shall be retained at the source and shall be made available, for inspection by the Compliance Authority, for a minimum of 2 years.

[40 CFR 61.53(d)]

{Permitting note: The permittee conducted initial stack testing on April 6, 2011, which demonstrated Hg emissions less than 3.5 lb per 24-hour period. Therefore, no further Hg testing is required unless operations change which could affect Hg emissions, or as otherwise requested by the Department per condition G.29.}

2. Response: As a result of this comment, **Specific Condition No. G.29.** is hereby changed:

From: Mercury Emissions - Annual Compliance Demonstration: The Permittee shall monitor mercury emissions at intervals of at least once per year by using the Sludge Sampling (Method 105 of 40 CFR 61 Appendix B) or the Stack Sampling (Method 101A of 40 CFR 61 Appendix B or the procedures specified in Specific Condition G.27.), if the mercury emissions as demonstrated by either of these methods exceed 1.6 kg (3.5 lb) per 24-hour period.

The results of monitoring shall be reported and retained according to Specific Condition No. G.26.(d) and (e) or Specific Condition No. G.28.(g) and (h).

[40 CFR 61.55(a)]

To: Mercury Emissions - Annual Compliance Demonstration: If the mercury emissions as demonstrated by any of the methods described in Specific Condition Nos. G.26., G.27., or G.28. exceed 1.6 kg (3.5 lb) per 24-hour period and/or exceed 0.1 tons per 12 month rolling total the Permittee shall monitor mercury emissions at intervals of at least once per year (JAN - DEC).

The results of monitoring shall be reported and retained according to Specific Condition No. G.26.(d) and (e) or Specific Condition No. G.28.(g) and (h).

If the mercury emissions as demonstrated by any of the methods described in Specific Condition Nos. G.26., G.27., or G.28. do not exceed 1.6 kg (3.5 lb) per 24-hour period and do not exceed 0.1 tons per 12 month rolling total the Permittee shall monitor mercury emissions upon request of the Department.

[Rule 62-4.070, F.A.C., 40 CFR 61.55(a), and Rule 62-212.400, F.A.C.]

{Permitting note: The permittee conducted initial stack testing on April 6, 2011, which demonstrated Hg emissions less than 3.5 lb per 24-hour period. Therefore, no further Hg testing is required unless operations change which could affect Hg emissions, or as otherwise requested by the Department per the above condition.}

3. Response: As a result of this comment, **Specific Condition No. I.9.** is hereby changed:

From: Bleaching HAP concentration measurement. For purposes of complying with the bleaching system requirements in 40 CFR 63.445, the owner or operator shall measure

the total HAP concentration as the sum of all individual chlorinated HAPs or as chlorine.

Testing shall be conducted in accordance with the procedures and methods described in 40 CFR 63.457(b)(5)(ii) [EPA RM 26A of 40 CFR , Part 60, Appendix A]. Testing and compliance demonstrations shall be conducted once each federal fiscal year.

[40 CFR 63.457(b, h); Rule 62-297.310(7)(a)4.c., F.A.C.]

To: Bleaching HAP concentration measurement. For purposes of complying with the bleaching system requirements in 40 CFR 63.445, the owner or operator shall measure the total HAP concentration as the sum of all individual chlorinated HAPs [chloroform is excluded in accordance with 40 CFR 63.445(c)] or as chlorine.

Testing shall be conducted in accordance with the procedures and methods described in 40 CFR 63.457(b)(5)(ii) [EPA RM 26A of 40 CFR , Part 60, Appendix A].

Testing and compliance demonstrations shall be conducted once each federal fiscal year.

[40 CFR 63.445(c), 40 CFR 63.457(b, h); Rule 62-297.310(7)(a)4.c., F.A.C.]

III. Conclusion.

The permitting authority hereby issues the PROPOSED Permit with the changes noted above.