FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

NOTICE OF ADMINISTRATIVELY CORRECTED PERMIT

In the Matter of a Request for Administrative Correction:

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

Project No. 0890004-043-AV
Administrative Correction to Permit No. 0890004-042-AV
Fernandina Beach Sulfite Pulp Mill
Nassau County

Enclosed is an Administratively Corrected Condition(s) to the Title V Air Operation Permit No. 0890004-042-AV, for the operation of the Fernandina Beach Sulfite Pulp Mill located in Nassau at the foot of Gum Street in Fernandina Beach, Florida. This correction is issued pursuant to Rule 62-210.360, Florida Administrative Code (F.A.C.), and Chapter 403, Florida Statutes (F.S.). This change is made at the applicant's request dated May 23, 2014, to correct the Renewal Application Due Date on the Title page; include additional regulations in Subsection C. - Applicable Regulations, correct Condition B.1.a(2); change Subsection E description; and added the Combined Appendices containing the Appendix RR, TR, TV, I and U, which was omitted from the zipped TV permit file. This corrective action does not alter the effective dates of the existing permit.

The Department of Environmental Protection (Department) will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Agency Clerk in the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice. Petitions filed by any other person must be filed within 14 (fourteen) days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact.

If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action.
A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Any party to this order (permit) has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000 and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal.

The Notice of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Jacksonville, Florida.

Richard S. Rachal III, P.G.
Program Administrator
Waste and Air Resource Management Program

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Administratively Corrected Permit (including the corrected page(s)) or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested to the persons listed below:

Mr. C. A. McDonald, General Manager: (ca.mcdonald@rayonier.com)
Mr. David Rogers, Manager, Environmental Operations: (david.rogers@rayonier.com)
Mr. David Buff, P.E. of Record- Golder Associates Inc.: (dbuff@golder.com)
Ms. Natalia Gonzalez- Golder Associates Inc.: (Natalia_Gonzalez@golder.com)
Ms. Barbara Friday, DEP-BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

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.

Leslie Maybin
(Clerk)

May 30, 2014
(Date)

Pursuant to the applicant's request, conditions /requirements contained in permit No. 0890004-042-AV have been corrected as indicated below. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight.

1. Title page- Please note that according to Florida Administrative Code (F.A.C.) 62-213.420(1)(a) a timely application for a permit renewal is one that is submitted 225 days before the expiration of a permit. Therefore, since the current permit expires on October 10, 2016, the renewal application due date should be February 28, 2016, not May 22, 2015.

The Title page is hereby changed as follows:

FROM: ~~May 22, 2015~~

TO:

February 28, 2016.

2. Pg. 2 of 68: Subsection C- Applicable Regulations. Applicable regulations contained in 40 CFR Part 61 Subpart A and Subpart E have been left out of from this table and should be included.

FROM:

Regulation	**EU No(s).**
40 CFR 60, Subpart A, NSPS General Provisions	022
40 CFR 60, Subpart D	022
40 CFR 63 Subpart A	005, 010, 011, 021
40 CFR 63, Subpart S	005, 010, 011, 021
40 CFR 63, Subpart MM	006
40 CFR 63, Subpart DDDDD	022
State Rule Citations 62-296.410, 62- 296.405, 62-296.410, 62-296.320, LRACT, Rule 62-212.400, F.A.C.)	005, 006, 022

TO:

Based on the Title V air operation permit revision application received January 31, 2014, this facility **is a** major source of hazardous air pollutants (HAP). The existing facility **is a** PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 60, Subpart A, NSPS General Provisions	022
40 CFR 60, Subpart D	022
40 CFR 63 Subpart A	005, 010, 011, 021
40 CFR 61, Subpart A, NESHAP General Provisions	022
40 CFR 61, Subpart E	022
40 CFR 63, Subpart S	005, 010, 011, 021
40 CFR 63, Subpart MM	006
40 CFR 63, Subpart DDDDD	022
State Rule Citations 62-296.410, 62- 296.405, 62-296.410, 62-296.320, LRACT, Rule 62-212.400, F.A.C.)	005, 006, 022

3. Pg. 9 of 68: Specific Condition B.1.a(2). This condition should reference Subsection G of Title V Permit No. 0890004-042-AV, not Permit No. 0890004-037-AV.

FROM:

(2) On-specification used oil subject to the requirements of Subsection G of FINAL Title V Permit No. 0890004-~~037~~-AV limited amounts of facility-generated on-specification used oil may be blended and fired with the No. 6 fuel oil.

TO:

(2) On-specification used oil subject to the requirements of Subsection G of FINAL Title V Permit No. 0890004-042-AV limited amounts of facility-generated on-specification used oil may be blended and fired with the No. 6 fuel oil.

4. Pg. 40 of 68: Subsection E- 40 CFR Part 63, Subpart S Common Conditions. This section should reference EU ID 005, 021, and 010, not only EU010. Correct description is shown in the previous Title V permit.

FROM:

Emissions Unit 010 consists of the Biological Effluent Treatment System. The effluent from the systems required to be treated by 40 CFR 63 Subpart S (MACT I) combined with other mill effluent is treated in a primary, open clarifier and the aerated stabilization basin (biological treatment system). The biological treatment removes the methanol from the effluent via bacterial digestion.

TO:

This section addresses the following emissions units.

E.U. ID No.	Brief Description
005	Vent Gas Scrubber and Direct Contact Condenser
021	Evaporator Vents Methanol Condenser
010	Biological Effluent Treatment System

Emission Unit 005 identifies the vent gas scrubber (wet scrubber) and direct contact condenser, which controls emissions from numerous vents from the cooking acid plant, the red stock washers, the unwashed stock tank, the spent sulfite liquor storage tanks, the spent sulfite liquor washer area, the digesters (6), and the blow pits. The scrubber is a packed bed containing 10 feet of packing consisting of two packed sections. The lower section is designed for sulfur dioxide emissions control via gas absorption using alkaline scrubbing media (soda ash, sodium hydroxide, etc.). The spent scrubber media is bled first to other closed sources to make maximum use of the alkali to remove sulfur dioxide, and then to sewer via closed piping to number 1 Pump Station. The sulfur dioxide concentration in the stack is continuously measured with a CMS.

The upper packed section of the vent gas scrubber is designed to condense methanol from the gas stream by direct contact with fresh well water, i.e. the Direct Contact Condenser. This is a once through process. The condensed methanol held in the water is sent to the biological effluent treatment system for treatment in order to comply with the requirements of 40 CFR 63 Subpart S.

Emissions Unit 021 identifies the Evaporator Vents Methanol Condenser System. The steam that is used to eject the vent gases from the two sets of multiple effect evaporators dedicated to increasing the solids concentration of red liquor, along with the evaporator vent gases themselves, are piped to a pre-condenser which condenses the steam followed by the main condenser which condenses the methanol. The gases are then are sent to the multi-stage wet scrubber/Brinks Demister at the Recovery boiler (Emissions Unit No. 006) before being vented to the atmosphere.

In addition, a third multiple effect evaporator train consisting of three (3) refurbished existing evaporators bodies, was installed under Construction Permit No. 0890004-018-AC. It is used to increase the solids concentration of weak Hot Caustic Extract (the spent solution from the pulp washed after the Hot Caustic Extraction stage which is sold to Kraft mills for its sodium content and energy value). This third MEE train is also vented to the pre-condenser followed by the main condenser and the multi-stage wet scrubber/Brinks Demister at the Recovery boiler (Emissions Unit No. 006) before being vented to the atmosphere.

The water used to condense the steam and methanol in the two condensers is reclaimed from the biological effluent treatment system after the methanol has been digested. The condensate formed in the pre-condenser and the main condenser is sewered to the biological effluent treatment system via the Number 3 Pump Station for compliance with the 40 CFR 63 Subpart S requirements. The non-condensable gases from the main condenser are sent to the multi-stage wet scrubber/Brinks Demister at the Recovery boiler (Emissions Unit No. 006) before being vented to the atmosphere.

Emissions Unit 010 consists of the Biological Effluent Treatment System. The effluent from the systems required to be treated by 40 CFR 63 Subpart S (MACT I) combined with other mill effluent is treated in a primary, open clarifier and the aerated stabilization basin (biological treatment system). The biological treatment removes the methanol from the effluent via bacterial digestion.

5. Pg. 68 of 68: Referenced Attachments: The list should reflect the previous Referenced Attachments shown in Permit No. 0890004-037-AV, as the one in the current permit is incomplete. All previously referenced attachments still seem to be included in the permit pdf files.
Appendix RR, TR, TV, I and U are missing from the TV permit. They should be included.

The Combined Appendices containing the Appendix RR, TR, TV, I and U, which was omitted from the zipped TV permit file, has been added.