

Florida Department of
Environmental Protection

Memorandum

TO: Trina Vielhauer, Chief, Bureau of Air Regulation
THROUGH: Jeff Koerner, New Source Review Section JK
FROM: Bruce Mitchell, New Source Review Section
DATE: February 4, 2009
SUBJECT: Project No. 0890004-023-AC
Rayonier Performance Fibers – Fernandina Beach Mill
Revised No. 6 Power Boiler Project
Expiration Date Extension of Air Construction Permit No. 0890004-021-AC

We received a request on January 12, 2009, for the extension of the expiration date of air construction permit, No. 0890004-021-AC. Extending the expiration date will allow sufficient time to install the bleach plant scrubber that was authorized in this permit and allow additional time to complete the testing of the No. 6 Power Boiler while burning wastewater treatment sludge. The permit expires on March 1, 2009. Also, certain projects are being cancelled by the applicant that were identified in specific condition D-3 in permit No. 0890004-021-AC.

Attachments



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

February 5, 2009

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Sent by Electronic Mail – Received Receipt Requested

Mr. F. J. Perrett
General Manager
Rayonier Performance Fibers LLC
Fernandina Beach Mill
10 Gum Street
Fernandina Beach, Florida 32035

Re: Extension of the Expiration Date of Air Construction Permit No. 0890004-021-AC
Rayonier Performance Fibers LLC, Fernandina Beach Mill
Project No. 0890004-023-AC
Revision to No. 6 Power Boiler Project

Dear Mr. Perrett:

We received a request on January 12, 2009, for the extension of the expiration date of air construction permit, No. 0890004-021-AC. Extending the expiration date will allow sufficient time to install the bleach plant scrubber that was authorized in this permit and allow additional time to complete the testing of the No. 6 Power Boiler while burning wastewater treatment sludge. The permit expires on March 1, 2009. Due to market conditions, certain projects are being cancelled by the applicant that were identified in specific condition D-3 in permit No. 0890004-021-AC.

The following construction projects have been cancelled:

- install a new HCE blow heat recovery system;
- install a new HCE cell;
- install a new HCE washer;
- install a new post HCE washer;
- install a new Red Stock Washer Press Roll; and
- make improvements to the pulp machine (Pocket Ventilation piping and headbox).

The first trial tests have been completed while burning the wastewater treatment sludge in the No. 6 Power Boiler. Additional time is needed to complete the trial test burns, which are scheduled for March/April 2009. Also, additional time is needed for the installation of the bleach plant scrubber and/or other equipment needed to comply with the provisions on 40 CFR 63.445, complete shakedown of installed equipment, perform the required tests and submit a timely Title V operation permit revision application.

Based on the circumstances and information provided, the Department of Environmental Protection (Department) approves the request to extend the expiration date.

Determination: The expiration date of air construction permit No. 0890004-021-AC is hereby extended from **March 1, 2009** to **September 1, 2010**, to provide the necessary time to: (1) install the bleach plant scrubber and/or other equipment needed to comply with the provisions on 40 CFR 63.445, complete shakedown of installed equipment, perform the required tests and submit a timely Title V operation permit revision application; and (2) complete the trial tests on the No. 6 Power Boiler while burning wastewater treatment sludge in accordance with the specific conditions in Section G of the permit. Based on the circumstances and information

EXTENSION OF AIR CONSTRUCTION PERMIT EXPIRATION DATE

provided, the Department approves this request. A copy of this letter shall be filed with the referenced permits and shall become part of the permits. This permitting decision is issued pursuant to Chapter 403, Florida Statutes (F.S.).

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, F.S., and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Petitions: 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 with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions must be filed within 14 days of receipt of these permit extensions. A petitioner shall 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; (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 written 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.

Mediation: Mediation is not available in this proceeding.


Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely

EXTENSION OF AIR CONSTRUCTION PERMIT EXPIRATION DATE

filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing 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, Mail Station #35, 3900 Commonwealth Boulevard, 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

TLV/jfk/bm

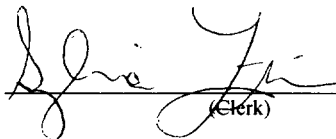
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Extension of Air Construction Permit Expiration Date was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 2/5/09 to the persons listed below.

- Mr. Fred J. Perrett, General Manager, Rayonier Performance Fibers LLC (jack.perrett@rayonier.com)
- Mr. David Rogers, Rayonier Performance Fibers LLC (david.rogers@rayonier.com)
- Ms. Debra Lane, Rayonier Performance Fibers LLC (debra.lane@rayonier.com)
- Mr. Christopher Kirts, Air Permitting Administrator, Northeast District (Christopher.Kirts@dep.state.fl.us)
- Ms. Vickie Gibson, BAR Reading File (Victoria.Gibson@dep.state.fl.us)

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.


(Clerk)

2/5/09
(Date)

**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

Applicant

Rayonier Performance Fibers LLC
Fernandina Beach Dissolving Sulfite Pulp Mill
Facility ID No. 0890004

County

Nassau County, Florida

Project

Project No. 0890004-023-AC
Expiration Date Extension of Project No. 0890004-021-AC

Permitting Authority

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation – New Source Review Section
2600 Blair Stone Road, Mail Station #5505
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114
Fax: 850/921-9533

1. APPLICATION INFORMATION

Facility Location

Rayonier Performance Fibers LLC operates an existing dissolving sulfite pulp mill located at 10 Gum Street in Fernandina Beach, Nassau County, Florida 32035. The UTM coordinates are Zone 17, 454.7 km East, and 3392.2 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS).

Facility Classification

The facility belongs to Major Group No. 26 (Paper and Allied Products), Group No. 261 (Pulp Mills), and Industry No. 2611 (Pulp Mills). The North American Industry Classification System (NAICS) Code is No. 322110 (Pulp Mills). The facility is regulated according to the following categories.

Title III: The plant is a major source of hazardous air pollutants (HAP).

Title IV: The plant has no units subject to the acid rain provisions of the Clean Air Act.

Title V: The plant is a Title V major source of air pollution in accordance with Chapter 213, Florida Administrative Code (F.A.C.).

PSD: The plant is a major facility in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

NSPS: The plant operates units are subject to the New Source Performance Standards (NSPS) in Title 40 of the Code of Federal Regulations, Part 60 (40 CFR 60).

NESHAP: The plant operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR 63.

Project Description

We received a request on January 12, 2009, for the extension of the expiration date of air construction permit, No. 0890004-021-AC. Extending the expiration date will allow sufficient time to install the bleach plant scrubber that was authorized in this permit and allow additional time to complete the testing of the No. 6 Power Boiler while burning wastewater treatment sludge. The permit expires on March 1, 2009. Also, certain projects are being cancelled by the applicant that were identified in specific condition D-3 in permit No. 0890004-021-AC as follows:

- Add red stock washer press roll;
- Begin second improvements to the pulp machine (pocket ventilation piping and headbox);
- Add a new HCE cell;
- Install a new HCE washer;
- Install a new post HCE washer; and
- Install a new HCE blow heat recovery system to control all HCE cells.

The following tentative schedule is proposed to install the bleach plant scrubber:

<i>Project</i>	<i>Date</i>
Washer hood installation/modification and equipment tie-ins	February 2009
Install collecting ductwork, scrubber tower and associated equipment	3 rd Quarter 2009
Scrubber startup	4 th Quarter 2009
Compliance testing	January 2010

In addition, the permittee is withdrawing the request to increase the red liquor firing rate in the recovery boiler. The applicant stated that the additional trial tests on the No. 6 Power Boiler while burning wastewater treatment sludge are tentatively scheduled for March/April 2009.

Therefore, in order to provide sufficient time for installation and testing of the bleach plant scrubber and completion of the trial tests while burning wastewater treatment sludge in the No. 6 Power Boiler, the applicant requested an expiration date of September 1, 2010.

2. REVIEW OF THE PREVIOUS AC PERMITS FOR PROGRESS OF AUTHORIZED WORK

As required in specific conditions D.3. through D.6. of AC permit No. 0890004-021-AC, the permittee is required to report to the Department the progress of the authorized work, which has been done and is current. Also and as authorized in AC permit No. 0890004-021-AC, the permittee has completed the first round of trial tests on the No. 6 Power Boiler while burning wastewater treatment sludge and the test results were submitted to the Department on November 25, 2008. Therefore, the expiration date will be revised from March 1, 2009 to September 1, 2010.

3. CONCLUSION

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 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 permit. Bruce Mitchell is the project engineer responsible for reviewing the application and drafting the permit changes. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Thursday, February 05, 2009 1:18 PM
To: 'jack.perrett@rayonier.com'
Cc: 'david.rogers@rayonier.com'; 'debra.lane@rayonier.com'; Kirts, Christopher; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)
Subject: RAYONIER FERNANDINA SULFITE MILL; 0890004-023-AC - Extension
Attachments: 0890004-023-AC.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". **We must receive verification that you are able to access the documents.** Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0890004.023.AC.F_pdf.zip

Owner/Company Name: RAYONIER PERFORMANCE FIBERS LLC

Facility Name: RAYONIER FERNANDINA SULFITE MILL

Project Number: 0890004-023-AC

Permit Status: FINAL

Permit Activity: CONSTRUCTION/ NO. 6 BOILER REVISION EXT.

Facility County: NASSAU

Processor: Bruce Mitchell

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

Livingston, Sylvia

From: David.Rogers@rayonier.com
Sent: Thursday, February 05, 2009 1:39 PM
To: Livingston, Sylvia
Subject: Re: RAYONIER FERNANDINA SULFITE MILL; 0890004-023-AC - Extension

Documents have been received, thank you.

David Rogers

Livingston, Sylvia

From: Jack.Perrett@rayonier.com
Sent: Thursday, February 12, 2009 8:00 AM
To: Livingston, Sylvia
Subject: Re: FW: RAYONIER FERNANDINA SULFITE MILL; 0890004-023-AC - Extension
Attachments: 0890004-023-AC.pdf

Ms. Livingston,

Yes, we were able to access the documents. Sorry for not replying. I assumed my Environmental Manager had replied.

Thank you,

Jack Perrett
General Manager
Fernandina Mill

"Livingston,
Sylvia"
<Sylvia.Livingston@dep.state.fl.us
>

02/11/2009 05:36
PM

To
"jack.perrett@rayonier.com"
<'jack.perrett@rayonier.com'>
cc
Subject
FW: RAYONIER FERNANDINA SULFITE
MILL; 0890004-023-AC - Extension

Mr. Perrett,

We have not received confirmation that you were able to access the documents attached to this February 5th e-mail, as well as the documents provided in the link (http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0890004.023.AC.F_pdf.zip) referenced in the email. Please confirm receipt by opening the attachment and clicking on the link to the permit documents, and sending a reply to me.

The Division of Air Resource Management is sending electronic versions of these documents rather than sending them Return Receipt Requested via the US Postal service. Your "receipt confirmation" reply serves the same purpose as tracking the receipt of the signed "Return Receipt" card from the US Postal Service. Please let me know if you have any questions. Thanks,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)

850/921-9506

sylvia.livingston@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you.

Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Livingston, Sylvia

Sent: Thursday, February 05, 2009 1:18 PM

To: 'jack.perrett@rayonier.com'

Cc: 'david.rogers@rayonier.com'; 'debra.lane@rayonier.com'; Kirts, Christopher; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)

Subject: RAYONIER FERNANDINA SULFITE MILL; 0890004-023-AC - Extension

Dear Sir/ Madam:

Attached is the official Notice of Final Permit for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0890004.023.AC.F_pdf.zip

Owner/Company Name: RAYONIER PERFORMANCE FIBERS LLC Facility Name: RAYONIER FERNANDINA SULFITE MILL Project Number: 0890004-023-AC Permit Status: FINAL Permit Activity: CONSTRUCTION/ NO. 6 BOILER REVISION EXT.

Facility County: NASSAU

Processor: Bruce Mitchell

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)

850/921-9506

sylvia.livingston@dep.state.fl.us