


Florida Department of Environmental Protection

Memorandum

To: Trina Vielhauer, Bureau of Air Regulation
Through: Jeff Koerner, New Source Review Section 
Date: May 12, 2010
Subject: Project No. 0890004-030-AC
Rayonier Performance Fibers, LLC, Sulfite Mill
Permit Extension for No. 6 Power Boiler

Project Description

Rayonier Performance Fibers, LLC operates the existing sulfite mill located in Nassau County at 10 Gum Street in Fernandina Beach, Florida. Attached for your review is a letter authorizing a second extension of the permit expiration date of air construction Permit No. 0890004-021-AC to provide additional time to install an optional permanent selective non-catalytic reduction (SNCR) system for the No. 6 Power Boiler. Under authorization of the air construction permit, the applicant installed a temporary SNCR system to determine the feasibility and system benefits.

History

- Permit No. 0890004-018-AC: This original air construction permit authorized an increase in the permitted throughput capacity for the facility operations, authorized installation of the new No. 6 Power Boiler to replace permanently shutdown Nos. 1-3 Power Boilers, authorized installation of three evaporator bodies to evaporate moisture from hot caustic extract and recognized the existing production of the No. 6 Batch Digester.
- Permit No. 0890004-021-AC: This project revised original Permit No. 0890004-018-AC for increased maximum steam production rates, authorization of spent sulfite liquor as an approved fuel, removal of the industrial boiler MACT provisions (Subpart DDDDD, 40 CFR Part 63) and authorization of a trial burn of wastewater treatment solids in the No. 6 Power Boiler.
- Permit No. 0890004-023-AC: This project extended the expiration date of Permit No. 0890004-018-AC from March 1, 2009 to September 1, 2010 to 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 solids. At that time, the permittee indicated that the following construction projects have been cancelled: install a new hot caustic extract (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 head-box).

The preliminary schedule to install the bleach plant scrubber was identified as:

February 2009:	Tie in the washer hood installation/modification and equipment;
3 rd Quarter 2009:	Install collecting ductwork, scrubber tower and associated equipment
4 th Quarter 2009:	Scrubber startup; and
January 2010:	Compliance testing.

According to the Northeast District, installation of the scrubber for the bleach plant has been completed and an initial compliance test conducted. The test report has not yet been submitted.

- In February 2010 correspondence with the Northeast District Office, we explained that the permit continues to authorize replacement or improvements to the head-box, but that the extension was clarifying the permittee's current intentions with regard to specific projects. In addition, the permit authorizes the installation of SNCR to control emissions of nitrogen oxides. In accordance with Rule 62-210.300(1), F.A.C., if the plant allows the permit to expire, they will need to apply for an air construction permit to install this equipment.

Conclusion

I recommend your approval of the attached extension.



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 11, 2010

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 Air Construction Permit Expiration Date
Rayonier Performance Fibers, LLC
Project No. 0890004-030-AC
Second Extension of Air Permit No. 0890004-021-AC

Dear Mr. Perrett:

On March 22, 2010, you requested an extension of the expiration date of air construction Permit No. 0890004-021-AC for the Fernandina Beach Sulfite Mill located in Nassau County at 10 Gum Street in Fernandina Beach, Florida. Specifically, you requested additional time to install an optional selective catalytic reduction system on the No. 6 Power Boiler. Based on the circumstances and information provided, the Department approves this request as follows.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. 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.

Determination: The expiration date is hereby extended from **September 1, 2010** to **September 1, 2011** to provide the necessary time to complete construction of an optional selective catalytic reduction system on the No. 6 Power Boiler. The permittee is reminded that an application to revise the Title V air operation permit is required for all work that has been completed. This permitting action does not authorize any new construction. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

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

EXTENSION OF AIR CONSTRUCTION PERMIT EXPIRATION DATE

receipt of this permit extension. 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 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 of Environmental Protection 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

EXTENSION OF AIR CONSTRUCTION PERMIT EXPIRATION DATE

TLV/jfk

CERTIFICATE OF SERVICE

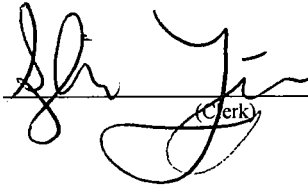
The undersigned duly designated deputy agency clerk hereby certifies that this Extension of Air Construction Permit Expiration Date was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on

5/12/10 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, DEP Northeast District Office (christopher.kirts@dep.state.fl.us)
- Ms. Vickie Gibson, DEP 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)

5/12/10

(Date)

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Wednesday, May 12, 2010 1:05 PM
To: 'jack.perrett@rayonier.com'
Cc: 'david.rogers@rayonier.com'; 'debra.lane@rayonier.com'; Kirts, Christopher; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: RAYONIER FERNANDINA SULFITE MILL; 0890004-030-AC - Extension
Attachments: 0890004-030-AC_Extension.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".

Note: 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/0890004.030.AC.F_pdf.zip

Owner/Company Name: RAYONIER PERFORMANCE FIBERS LLC

Facility Name: RAYONIER FERNANDINA SULFITE MILL

Project Number: 0890004-030-AC

Permit Status: FINAL

Permit Activity: CONSTRUCTION/ Extension

Facility County: NASSAU

Processor: Jeff Koerner

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/emission/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

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, Sylvania

From: Jack.Perrett@rayonier.com
Sent: Thursday, May 20, 2010 3:03 PM
To: Livingston, Sylvania
Cc: David.Rogers@rayonier.com; CA.McDonald@rayonier.com
Subject: Re: FW: RAYONIER FERNANDINA SULFITE MILL; 0890004-030-AC - Extension
Attachments: 0890004-030-AC_Extension.pdf

I have received the document and can view it.

Thanks,

Jack Perrett

General Manager
Rayonier Performance Fibers
Jesup Mill

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

"'jack.perrett@rayonier.com'"
<'jack.perrett@rayonier.com'>

To

cc

05/20/2010 02:51
PM

Subject

FW: RAYONIER FERNANDINA SULFITE
MILL; 0890004-030-AC - Extension

Dear Jack Perrett:

We have not received confirmation that you were able to access the documents attached to this May 12th e-mail. Please confirm receipt by opening the attachment 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.

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

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: Wednesday, May 12, 2010 1:05 PM

To: 'jack.perrett@rayonier.com'

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

Subject: RAYONIER FERNANDINA SULFITE MILL; 0890004-030-AC - Extension

Dear Sir/ Madam:

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Owner/Company Name: RAYONIER PERFORMANCE FIBERS LLC Facility Name: RAYONIER FERNANDINA

SULFITE MILL Project Number: 0890004-030-AC Permit Status: FINAL Permit Activity:

CONSTRUCTION/ Extension Facility County: NASSAU

Processor: Jeff Koerner

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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

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Adobe Acrobat Reader can be downloaded for free at the following internet

Livingston, Sylvia

From: David.Rogers@rayonier.com
Sent: Wednesday, May 12, 2010 4:59 PM
To: Livingston, Sylvia
Subject: Re: RAYONIER FERNANDINA SULFITE MILL; 0890004-030-AC - Extension

I am able to view the project documents, thank you.

David