

# Rayonier RECEIVED

*Specialty Pulp Products*

DEC 06 1999

*Fernandina Mill*

BUREAU OF AIR REGULATION

December 3, 1999

Christopher Kirts  
District Air Program Administrator  
Department of Environmental Protection  
7825 Baymeadows Way, Suite B200  
Jacksonville, FL 32256-7590

RE: Permit Revision of Title V Permit No. 08900004-005-AV, Project 008,  
Request for Additional Information dated September 20, 1999; and  
Removal of Project 007 from Title V Permit No. 08900004-005-AV

Dear Mr. Kirts:

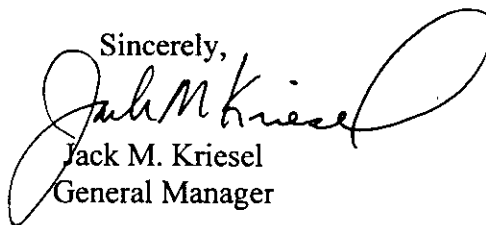
On April 26, 1999 the Department issued a final revision to the above referenced Title V permit to include project 007, a temporary 212 MMBtu/hr oil fired boiler. On July 28, 1999 Mr. Jack Kriesel, General Manager, made a letter request to change the oil burned by this temporary boiler from No. 6 oil to No. 2 oil. On September 20, 1999 you requested additional information regarding the July 28, 1999 permit modification request. This became Title V project 008.

This temporary boiler is no longer needed and has been removed from the mill site. Therefore, Rayonier can withdraw its July 28, 1999 permit modification request. This removes the requirement to pursue answers to your September 20, 1999 Request for Further Information.

Also, since this boiler is no longer on site, it can be removed from the mill's Title V permit. Please consider this letter our application to remove Project 007 from Title V permit No. 08900004-005-AV.

If you have questions, please contact David Tudor at (904)277-1452 or E-mail at [david.tudor@rayonier.com](mailto:david.tudor@rayonier.com).

Sincerely,



Jack M. Kriesel  
General Manager

cc: Rita Felton-Smith  
✓ Syed Arif

Registered to ISO 9002



Certificate No. A2087

The Foot of Gum Street • P. O. Box 2002 • Fernandina Beach, FL 32035-2002  
Telephone (904) 261-3611 • Fax (904) 277-1413



Jeb Bush  
Governor

# Department of Environmental Protection

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590

David B. Struhs  
Secretary

Dick (Dave T)  
re: Revis  
9/28

September 20, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jack M., Kriesel, General Manager  
Rayonier, Inc.  
Foot of Gum Street  
Fernandina Beach, Florida 32035-1309

Nassau County - AP  
Rayonier, Inc. - Fernandina Mill  
Request for Additional Information  
Permit Revision of Title V Permit No.: 0890004-005-AV  
Project 008

Dear Mr. Kriesel:

In accordance with Rule 62-213.420(1)(b)2., F.A.C., and Rule 62-4.055(1), F.A.C., the Department has reviewed the subject application and has determined that the following information and questions need to be answered before the application can be further processed.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. In accordance with Rule 62-213.420(1)(b)1., an applicant for permit revision must submit an application on form number 62-210.900(1) F.A.C. containing only that information related to the proposed change(s). Please complete the necessary application pages, including but not limited to the Segment (Process/Fuel) information, Purpose of Application, and Certification by the Responsible Official in accordance with Rule 62-213.420(4), F.A.C.
2. Because No. 6 fuel oil is currently the only permitted fuel for the temporary package boiler (Emissions Unit 008) in referenced the Title V permit, (0890004-005-AV revised April 26, 1999), does Rayonier anticipate installing a separate, storage tank for the proposed No. 2 fuel oil? If so, will the tank be such that the requirements of 40 CFR 60 Subpart Kb are triggered?
3. In the permit revision letter received July 30, 1999, it is stated that Rayonier wishes Specific Condition I.5. Methods of Operation Fuel(s) to read, "Number 2 fuel oil may be used and the sulfur content shall not exceed 2.5% by weight."
  - a. Please explain why Rayonier wishes to maintain the 2.5% sulfur content limit since typically No. 2 fuel oil has a sulfur content in the range of 0.2 - 1.0% by weight.

**"Protect, Conserve and Manage Florida's Environment and Natural Resources"**

Printed on recycled paper.

Mr. Jack M., Kriesel, General Manager  
Request for Additional Information  
Permit Revision of Title V Permit No.: 0890004-005-AV, Project 008  
Page Two

- b. In accordance with Rule 62-296.406, sulfur dioxide emissions are limited by Best Available Control Technology. Guidance Memo DARM-PER/GEN-17 states that BACT Determinations for boilers which fire fuels containing higher than 0.05% sulfur, by weight, are to be completed by the Bureau of Air Regulation. Should Rayonier wish a sulfur content limit greater than 0.05%, a BACT determination must be completed by BAR.

Responsible Official (R.O.) Certification Statement:

Rule 62-213.420(4), F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the new long application form, DEP Form No. 62-210.900(1), effective February 11, 1999.

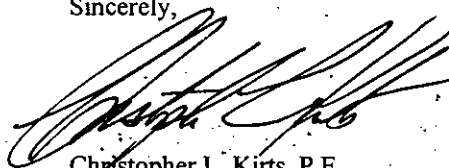
Professional Engineer (P.E.) Certification Statement:

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, your response should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P. E. certification statement page from the new long application form, DEP Form No. 62-210.900(1), effective February 11, 1999.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C.

If you should have any questions, please call Rita Felton-Smith at (904) 448-4310, extension 237

Sincerely,



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

RFS  
CLK:RFS

# Rayonier

Specialty Pulp Products

RECEIVED

Fernandina Mill

NOV 09 1999

November 2, 1999

BUREAU OF AIR REGULATION

FAX to Mort Benjamin  
Department of Environmental Protection

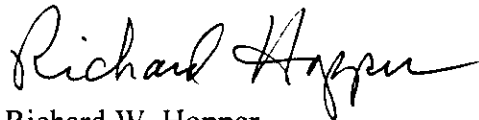
904/446-4366

Dear Mr. Benjamin:

This note is to inform you that temporary power boiler no. 8 was shutdown on October 28, and will be dismantled and returned to its owner during the weeks of November 1 & 8. As reported to you before we are testing the recovery boiler for particulate emissions today, and will test no. 2 power boiler through A-scrubber tomorrow. No. 2 power boiler was returned to service on October 25. Work has begun on No. 1 power boiler foundation. The mill plans to be down for its annual maintenance shutdown and pulp inventory adjustment from December 6 through January 3.

If you have any questions feel free to call me at (904) 277-1480.

Yours very truly,



Richard W. Hopper  
Manager, Environmental Operations

cc: JMK, FJP, WPH, DET  
Rita Felton-Smith, DEP Jacksonville  
Syed Arif

Registered to ISO 9002



Certificate No. A2087

al

# Rayonier

*Specialty Pulp Products*

**RECEIVED**

*Fernandina Mill*

OCT 28 1999

October 26, 1999

BUREAU OF AIR REGULATION

A. A. Linero  
New Source Review Section  
Department of Environment Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

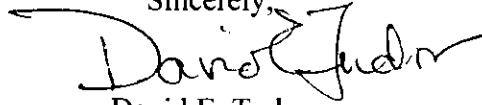
RE: DEP File No. 0890004-006-AC (PSD-FL-256)  
Fernandina mill, Temporary Replacement Boiler

Dear Mr. Linero:

I am responding to your letter of October 7, 1999 to Mr. Jack M. Kriesel, General Manager at Rayonier's sulfite pulp mill in Fernandina Beach.

The permit for this temporary replacement boiler expires January 31, 2000. By that time this boiler will be dismantled and removed from the mill site. No further permitting action is anticipated on this source.

Sincerely,



David E. Tudor  
Manager Environmental  
Affairs - Air

CC: Rita Felton-Smith  
Syed Arif  
Christopher Kirts

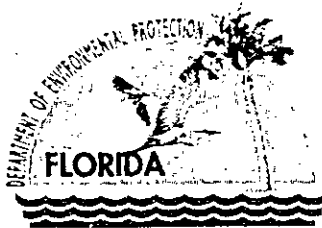
*[Faint, illegible text, likely bleed-through from the reverse side of the page]*

Registered to ISO 9002



Certificate No. A2087

The Foot of Gum Street • P. O. Box 2002 • Fernandina Beach, FL 32035-2002  
Telephone (904) 261-3611 • Fax (904) 277-1413



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Scrubs  
Secretary

October 7, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jack M., Kriesel, General Manager  
Rayonier, Inc.  
Foot of Gum Street  
Fernandina Beach, Florida 32035-1309

RE: DEP File No. 0890004-006-AC (PSD-FL-256)  
Fernandina Mill, Temporary Replacement Boiler

Dear Mr. Kriesel:

We were reminded by our District office that Permit No. 0890004-006-AC, for the temporary boiler expires on January 31, 2000. In addition to an expiration date, it is also a specific permit condition (Specific Condition 10) of the subject permit. Please confirm that Rayonier will cease operating the boiler in accordance with the permit.

Pursuant to Rule 62-4.080 F.A.C., you may request that this permit be extended as a modification of the permit. Such a request must be submitted in writing to this office before the January 31, 2000 expiration date. If such a request is made, you will need to request a modification of Specific Condition 10 and demonstrate the adequacy of the Best Available Control Technology (BACT) for this project. The main reason is that our BACT was based on the assumption of short-term operation (until January 31, 2000) of this temporary boiler.

If there are any questions regarding the above, please contact Syed Arif, P.E. at (850) 921-9528.

Sincerely,

A. A. Linero, P.E. Administrator  
New Source Review Section

AAL/sa

cc: Rita Felton-Smith, NED

Fold Along Overlap of Envelope to

Is your RETURN ADDRESS completed on the reverse side?

<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece, below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Jack M. Kriesel, Gen. Mgr. Rayonier, Inc. Foot of Hum St. Fernandina Bch, FL 32035-1309	4a. Article Number Z 031 392 018	7. Date of Delivery 10-13-99
5. Received By: (Print Name) M MITCHELL	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
6. Signature: (Addressee or Agent) X [Signature]	8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

Z 031 392 018

US Postal Service  
**Receipt for Certified Mail**  
 No Insurance Coverage Provided.  
 Do not use for international Mail (See reverse)

Sent to	Jack Kriesel
Street # Number	Rayonier Inc
Post Office, State, & ZIP Code	Fernandina Bch
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	0890004-000-AC 10-8-99 PSD-FI-256

PS Form 3800 April 1995

# Rayonier

Specialty Pulp Products

Fernandina Mill

RECEIVED

NOV 19 1998

BUREAU OF  
AIR REGULATION

November 17, 1998

BUREAU OF  
AIR REGULATION

NOV 19 1998

RECEIVED

Mr. Syed Arif, P.E.  
New Source Review Section  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: DEP File No. 08900004-006-AC (PSD-FL-256)  
Specialty Pulp Products, Temporary Replacement Boiler

Dear Mr. Arif:

Attached is an actual page 7B from the November 11, 1998 Fernandina Beach News Leader, containing the Legal Notices. Please note that one of the notices is the Public Notice of Intent to Issue Air Construction Permit for the above referenced permit. I am also enclosing a copy of the affidavit from the News Leader relating to this notification. I am submitting this material within 7 days of the publication date as proof of publication of the required notice.

If you need additional information please contact me at telephone:  
904-277-1452, Email: [david.tudor@rayonier.com](mailto:david.tudor@rayonier.com).

Sincerely,

*David E. Tudor* /CO

David E. Tudor

Manager Environmental Affairs - Air

Enclosures

cc: Rita Felton-Smith w/enclosure

cc: S. Arif, BAR  
NEP  
EPA  
NPS

Registered to ISO 9002



Certificate No. A2087



**PUBLIC NOTICE OF INTENT TO  
ISSUE AIR CONSTRUCTION  
PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL PROTECTION  
DEP File No. 0890004-006-AC  
(PSD-FL-256)

Fernandina Mill  
Rayonier, Incorporated  
Nassau County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Rayonier, Inc. to install a temporary boiler at its sulfate pulp mill. The plant is located at Foot of Gum Street, Fernandina Beach, Nassau County. A Best Available Control Technology (BACT) determination was required for nitrogen oxides, pursuant to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD). The applicant's name and address are: Rayonier, Inc., Post Office Box 2002, Fernandina Beach, Florida 32035.

The temporary boiler has a heat input rate of 212 Million British Thermal Units per hour and will be in operation for a period of only one year. The temporary boiler will be used in lieu of Power Boilers 1 and 2 while they undergo foundation repairs. The existing control equipments of venturi scrubbers will be used to control particulate matter and sulfur dioxide emissions from the temporary boiler. Nitrogen oxides (NO<sub>x</sub>) emission will be minimized from the temporary boiler by utilizing low NO<sub>x</sub> burners and flue gas recirculation. An air quality impact analysis was not required because of the temporary nature of the project.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed

(received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative

**Code**

A petition that disputes the material facts on which the Department'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 how and when petitioner received notice of the agency action or proposed action; (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, as well as the rules and statutes which entitle the petitioner to relief; and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department'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 Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays at:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/922-6979

Department of Environmental Protection  
Northeast District  
7825 Baymeadows Way, Suite 200B  
Jacksonville, Florida 32256-7590  
Telephone: 904/448-4300  
Fax: 904/448-4363

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

11-11-98  
8468

# News-Leader

Published Weekly

Ash Street/P.O. Box 766 (904) 261-3696  
Fernandina Beach, Nassau County, Florida 32034

## STATE OF FLORIDA COUNTY OF NASSAU:

Before the undersigned authority personally appeared

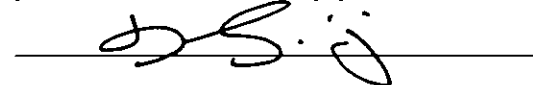
**Foy R. Maloy, Jr.**

who on oath says that he is the Publisher of The Fernandina Beach *News-Leader*, a weekly newspaper published at Fernandina Beach in Nassau County, Florida; that the attached copy of advertisement, being a **Legal Notice** in the matter of

## STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION DEP File No. 0890004-006-AC Rayonier, Incorporated

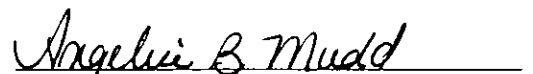
was published in said newspaper in the issues of  
**11-11-98**  
ref. No. **8468**

Affiant further says that the said Fernandina Beach *News-Leader* is a newspaper published at Fernandina Beach, in said Nassau County, Florida, and that the said newspaper has heretofore been continuously published in said Nassau County, Florida, each week and has been entered as second class mail matter at the post office in Fernandina Beach in said Nassau County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



Sworn to and subscribed before me

this 13th day of November, A.D. 1998.

  
Angelina B. Mudd Notary Public

TYPE OF IDENTIFICATION  
Personally Known 

ANGELINA B. MUDD  
Notary Public, State of Florida  
My Comm. expires Jan. 4, 2000  
Comm. No. CC 522754