



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

October 16, 2008

Electronically Sent – Received Receipt Requested

Mr. F. J. Perrett
Environmental Manager
Rayonier Performance Fibers LLC
Fernandina Beach Mill
The Foot of Gum Street
P.O. Box 2002
Fernandina Beach, Florida 32035

RE: Request for Permit Expiration Date Extension and Modification to the Sulfite Recovery Boiler
Project No. 0890004-023-AC

Dear Mr. Perrett:

On September 22, 2008, the Department's Bureau of Air Regulation received a request for a permit expiration date extension and for an increase in the red liquor solids firing rate to the sulfite recovery boiler at the existing sulfite mill located in Fernandina Beach, Nassau County, Florida. Based on our review of the proposed project, we have determined that the application is incomplete and the following additional information is needed in order to continue processing this application package. Please provide all assumptions, calculations, and reference material(s), that are used or reflected in any of your responses to the following issues:

1. The following changes and schedule were authorized in Subsection D. in air construction (AC) permit No. 0890004-018-AC, with an expiration date of March 1, 2009:

D. Facility.

D.1. Capacity.

- a. Except as provided below, the facility's production shall not exceed 162,000 air dried metric tons (ADMT) per consecutive 12-months, rolling total.
- b. Upon successful installation and submittal of the engineering report of the HCE blow heat recovery system to control VOC emissions from all of the HCE cells, the facility's production shall not exceed 175,000 ADMT per consecutive 12-months, rolling total.

D.2. The application indicates the following preliminary schedule for commencing construction:

Date	Activity
February 2006	Add a new HCE washer press roll
February 2007	Begin first improvements to pulp machine (drying and head-box)
	Add a new HCE evaporator train
February 2008	Install a new HCE blow heat recovery system to control all HCE cells
	Add a new HCE cell
	Install a new HCE washer
	Begin second improvements to pulp machine (drying and speed increase)
	Install a new post-HCE washer

* It is noted that some of the later changes are contingent on the success of the earlier stages.

Mr. F. J. Perrett

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Project No. 0890004-023-AC

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D.3. The permittee is authorized to perform the following construction and work:

- a. add a new HCE washer press roll;
- b. begin first improvements to pulp machine (drying and head-box);
- c. add a new HCE evaporator train; install a new HCE blow heat recovery system to control all HCE cells;
- d. add a new HCE cell;
- e. install a new HCE washer; begin second improvements to pulp machine (drying and speed increase); and,
- f. install a new post-HCE washer.

The permittee shall obtain prior written approval for any substantial changes to the work described above and in the application for this project.

D.4. Within fourteen (14) days of completing each of the above stages of work, the permittee shall provide a written notice of the following:

- a. type of work;
- b. date completed;
- c. deviations from original proposal; and,
- d. a discussion of any emissions impacts.

D.5. Attached to each required Annual Operating Report, the permittee shall provide a summary of the following to the compliance authority:

- a. a summary of work performed to date;
- b. a summary of work remaining;
- c. a preliminary schedule for completing any remaining work; and,
- d. the current production capacity of the mill (ADMT per year).

D.6. Performance tests.

a. Prior to increasing plant production beyond 162,000 ADMT per year, the permittee shall install a new HCE blow heat recovery system designed to reduce VOC emissions by 60% from all HCE cells. Upon successful completion of this system, the permittee shall conduct an engineering study to determine the effectiveness of this system in capturing and reducing VOC emissions to achieve designed efficiency. A test protocol shall be submitted to the Department for review and approval prior to commencing the engineering study. Within 60 days of completing the engineering study, the permittee shall submit a report summarizing: the final installed design, material flow rates, emissions, emissions capture, emissions control, and any necessary adjustments.

In regards to the authorized work and testing, as detailed above, please provide the following information:

- a. a detailed description of work and testing performed to date;
- b. a detailed description of work and testing remaining;
- c. a preliminary schedule for completing any remaining work; and,
- d. the current production capacity of the mill (ADMT per year).

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2. Explain in detail how the sulfite recovery boiler is now able to increase the red liquor solids firing rate. Describe in detail the physical changes that have been made to the sulfite recovery boiler to facilitate an increase in the red liquor solids firing rate. What is the manufacturer's design/name plate capacity of the sulfite recovery boiler's red liquor solids firing rate (provide documentation)?
3. What authorization did you have to test the sulfite recovery boiler at greater than its maximum permitted processing rate limit of 70,000 lbs/hr of red liquor solids? Please identify the permit project number authorizing the increase in firing rate and provide a copy of the authorizing document.
4. Any increase in actual emissions due to a modification are required to be evaluated in accordance with the Prevention of Significant Deterioration (PSD) regulations at Rule 62-212.400, Florida Administrative Code (F.A.C.), prior to making any change to the emissions unit. Please submit the actual emissions increase of pollutants due to the production request to increase the red liquor solids firing rate in the sulfite recovery boiler. Since the pollutant emissions are contemporaneous to permit project No. 0890004-018-AC, provide a PSD netting analysis that includes permit project No. 0890004-018-AC and all subsequent projects to date. Also, complete and submit the appropriate application and signature/seal pages for the modification request, which should include the R.O. signature and the seal and signature from a Professional Engineer (P.E.) registered in the State of Florida. If the emissions netting analysis requested reflects that the proposed facility's modification is equal to or greater than the significant emission rate for any pollutant pursuant to Rule 62-210.200(Definitions – Significant Emissions Rate), F.A.C., then a processing fee is required pursuant to Rule 62-4.050, F.A.C., and the requirements of Rule 62-212.400, F.A.C., must be addressed and provided.
5. The Department's Northeast District office is responsible for making all changes to your existing Title V Air Operation Permit. In regards to the Revision to the Title V Air Operation Permit, project No. 0890004-022-AV, you need to submit the appropriate application and signature/seal pages to the Department's Northeast District office for processing any changes to your existing Title V Air Operation Permit.

The Department will resume processing this application after receipt of the requested information. If you have any questions regarding this matter, please call Bruce Mitchell at (850)413-9198.

Sincerely,



Syed Arif, P.E.

New Source Review Section

Bureau of Air Regulation

SA/rbm

cc: Fred J. Perrett, General Manager, Rayonier Performance Fibers LLC (jack.perrett@rayonier.com)
Chris Kirts, Air Permitting Administrator, Northeast District (Christopher.Kirts@dep.state.fl.us)
David Rogers, Rayonier Performance Fibers LLC (david.rogers@rayonier.com)
David Tudor, Rayonier Performance Fibers LLC (david.tudor@rayonier.com)

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Thursday, October 16, 2008 4:12 PM
To: 'Jack.perrett@rayonier.com'; 'David.rogers@rayonier.com'; 'David.tudor@rayonier.com'
Cc: Kirts, Christopher; Arif, Syed; Walker, Elizabeth (AIR); Gibson, Victoria; Mitchell, Bruce
Subject: RAI -0890004-023-AC (Rayonier Performance Fibers LLC - Fernandina Beach Mill)
Attachments: 0890004-023-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); 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 of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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>> .

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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771
sylvia.livingston@dep.state.fl.us



0890004-023-AC.pdf (826 KB)

Tracking:

Recipient	Delivery	Read
✓ Jack.perrett@rayonier.com'		
✓ David.rogers@rayonier.com'		
✓ David.tudor@rayonier.com'		
✓ Kirts, Christopher		
✓ Arif, Syed		
✓ Walker, Elizabeth (AIR)		
✓ Gibson, Victoria		
✓ Mitchell, Bruce		
	<i>Debra Lane for David Tudor</i>	
	Delivered: 10/16/2008 4:12 PM	
	Delivered: 10/16/2008 4:12 PM	
	Delivered: 10/16/2008 4:12 PM	
	Delivered: 10/16/2008 4:12 PM	Read: 10/16/2008 4:13 PM
	Delivered: 10/16/2008 4:12 PM	

Livingston, Sylvia

From: David.Rogers@rayonier.com
Sent: Friday, October 17, 2008 7:54 AM
To: Livingston, Sylvia
Subject: Re: RAI -0890004-023-AC (Rayonier Performance Fibers LLC - Fernandina Beach Mill)

Attachments: 0890004-023-AC.pdf



0890004-023-AC.pdf (1 MB)

We have received the transmission, thank you.

David Rogers

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

10/16/2008 04:12
PM

To
<Jack.perrett@rayonier.com>,
<David.rogers@rayonier.com>,
<David.tudor@rayonier.com>

cc
"Kirts, Christopher"
<Christopher.Kirts@dep.state.fl.us>
, "Arif, Syed"
<Syed.Arif@dep.state.fl.us>,
"Walker, Elizabeth \ (AIR\)"
<Elizabeth.Walker@dep.state.fl.us>,
"Gibson, Victoria"
<Victoria.Gibson@dep.state.fl.us>,
"Mitchell, Bruce"
<Bruce.Mitchell@dep.state.fl.us>

Subject
RAI -0890004-023-AC (Rayonier
Performance Fibers LLC - Fernandina
Beach Mill)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); 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 of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be

Livingston, Sylvia

From: Debra.Lane@rayonier.com on behalf of davidtudor@hughes.ne
Sent: Friday, October 24, 2008 4:40 PM
To: Livingston, Sylvia
Cc: Mitchell, Bruce; Kirts, Christopher; Walker, Elizabeth (AIR); Arif, Syed; Gibson, Victoria
Subject: Re: RAI -0890004-023-AC (Rayonier Performance Fibers LLC - Fernandina Beach Mill)

Dear Ms. Livingston:

David Tudor has retired from Rayonier, effective September 30, 2008. I have recently joined the company as part of the corporate environmental team, and will be assuming Dave's responsibilities.

Please add me to your contact lists for the Rayonier Performance Fibers mill in Fernandina Beach, and remove David Tudor. My contact information is provided below.

I look forward to working with the Florida DEP on this and future projects.

Sincerely,

Debra D. Lane
Environmental Manager, Manufacturing
Corporate Environmental
Rayonier

Marketing and Research Center
P.O. Box 1280
Jesup, GA 31598

office: (912) 588-8117
cell: (904) 710-6243
fax: (912) 588-1476
debra.lane@rayonier.com

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

10/16/2008 04:12 PM

To <Jack.perrett@rayonier.com>, <David.rogers@rayonier.com>, <David.tudor@rayonier.com>

cc "Kirts, Christopher" <Christopher.Kirts@dep.state.fl.us>, "Arif, Syed" <Syed.Arif@dep.state.fl.us>, "Walker, Elizabeth (AIR)" <Elizabeth.Walker@dep.state.fl.us>, "Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>, "Mitchell, Bruce" <Bruce.Mitchell@dep.state.fl.us>

Subject RAI -0890004-023-AC (Rayonier Performance Fibers LLC - Fernandina Beach Mill)

Dear Sir/Madam:

10/24/2008